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NMED  
Hazardous Waste Bureau

Date: DEC 19 2013  
Refer to: WM-DO-13-0091  
LAUR: 13-29409

Mr. Dave Cobrain, Program Manager  
Hazardous Waste Bureau – New Mexico Environment Department  
Ref: Los Alamos National Laboratory TA-16 Open Burn Unit 399  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

Dear Mr. Cobrain:

**SUBJECT: TRANSMITTAL OF COMMENTS ON DRAFT CLOSURE PLAN OPEN BURNING TREATMENT UNIT TECHNICAL AREA 16-399 BURN TRAY**

The purpose of this letter is to transmit comments to the *Draft Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray* noticed by the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB) for public comment on November 19, 2013. The enclosed comments (LA-UR-13-29409) include proposed text revisions to the closure plan in the form of a table. The changes include descriptions of specific comments and the suggested revisions to the closure plan. If you have any comments or questions, please contact Mark P. Haagenstad, at (505) 665-2014.

Sincerely,

Michelle L. Coriz, Acting Group Leader  
Waste Management Programs Group  
Los Alamos National Security, LLC

MLC:MPH:LVH/lm

Enclosure: 1. Comments on the Closure Plan for the Open Burning Treatment Unit Technical Area 16-399 Burn Tray

Cy: Carl A. Beard, PADOPS, (E-File to [aosburn@lanl.gov](mailto:aosburn@lanl.gov))  
Michael T. Brandt, ADESH, (E-File to [lindasalazar@lanl.gov](mailto:lindasalazar@lanl.gov))  
Robert L. Dodge, WM-DO, (E-File)  
David J. Funk, WX-DO, (E-File)



Mr. Dave Cobrain  
WM-DO-13-0091

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Cy (continued):

Michael F. Stevens, WX-DO, (E-File)

Sandra J. Powell, WX-8, (E-File)

Mark P. Haagenstad, WM-PROG, (E-File)

Luciana Vigil-Holterman, WM-PROG, (E-File)

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# **ENCLOSURE 1**

**Comments on the Closure Plan for the Open Burning  
Treatment Unit Technical Area 16-399 Burn Tray**

**WM-DO-13-0091**

**LAUR-13-29409**

**U1400342**

**Date:** DEC 19 2013

**Comments on the Closure Plan for the Open Burning Treatment Unit  
Technical Area 16-399 Burn Tray**

**Introduction**

This document provides comments to the Closure Plan for Technical Area 16-399 Open Burning Unit at Los Alamos National Laboratory (LANL). The New Mexico Environment Department (NMED) issued this draft closure plan for public comment on November 19, 2013. The table included in the following pages describes specific comments to the draft closure plan.

**Table 1. Specific Comments to *Draft Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray***

<b>Comment No.</b>	<b>Section of Closure Plan</b>	<b>Page</b>	<b>Comment</b>	<b>Suggested Text Change</b>
1.	Title Page	Not applicable	The word "DRAFT" within the title is not accurate to the final issuance of the closure plan. This is no longer a draft copy of the closure plan given that it has been noticed for approval.	Please remove "DRAFT" from the title of the closure plan.
2.	List of Figures	v	Title included for Figure 1 does not match the title on figure.	Please change the title of the figure as follows: "Technical Area 16 (TA-16) Location Map- <b>at the Facility.</b> "
3.	List of Figures	v	Remove the reference to Figure 5 within the list, as there is no reference to it in the closure plan.	Please remove the Figure 5 reference.
4.	Definitions	vi	There is a typographical error within the first line of the section.	Please change "Plant" within the first sentence to "Plan".
5.	Definitions	vii	There are two clarifications necessary within the definition for "Permit."	Please change "Hazardous Waste Permit" to "Hazardous Waste <b>Facility</b> Permit" and please change "hereto" to "thereto" within the definition.
6.	Section 1.0	1	Within the first sentence of the section, the term "Draft" is not accurate to the final issuance of the closure plan. This is no longer a draft copy of the closure plan given that it has been noticed for approval.	Please remove the word "Draft" from the first sentence of the section.
7.	Section 1.0	1	Within the first sentence of the section, the term "Permittees" is not defined.	Please include a definition within the closure plan for the term "Permittees" or change to "Facility" within the first sentence of the section.
8.	Section 1.0	1	Within the second sentence of the section, there is a typographical error.	Please change "thermal treatment units" to "thermal treatment unit" within the second sentence of the section.

**Table 1. Specific Comments to Draft Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray (continued)**

Comment No.	Section of Closure Plan	Page	Comment	Suggested Text Change
9.	Section 1.0	1	There is a typographical error within the second sentence of the second paragraph. The unit in this closure plan is under interim status; therefore, 40 CFR Part 265 applies.	Please change the regulatory reference from "264.115" to "265.115" within the second sentence of the second paragraph.
10.	Section 1.0	1	The name of the local Department of Energy office has changed and should be updated within the closure plan.	Please change "Los Alamos Site Office" to "Los Alamos Field Office" within the second sentence of the second paragraph.
11.	Section 1.0	1	Incorrect permit section cited for amendment to the closure plan. Because the closure plan has been drafted for an interim status treatment unit, a permit modification request cannot be submitted to change an approved plan. Changes to the plan should be initiated through interim status requirements at Code of Federal Regulations, Title 40, § 265.112(c).	Please change "Permit Section 9.4.8" to "40 CFR § 265.112(c)" within the third sentence of the second paragraph.
12.	Section 2.1	1	Additional information is necessary for the unit description in the second paragraph of the section.	Please change the paragraph as follows: "The Unit consists of: a burn tray, firebrick, burn tray cover, <u>wheels, tracks</u> , a concrete pad, an electrical box, and is surrounded by a chain-link fence."
13.	Section 2.2	2	There is a typographical error within the last sentence of the section.	Please remove "PBX 9601" from the list of waste treated at the unit, as this explosive name does not exist.
14.	Section 2.3	2	The reference to "burn tray Operators" should be revised as not all transport to the TA-16 Burn Ground is conducted by an operator at the TA-16 Burn Ground.	Please change "burn tray Operators" within the first sentence of the paragraph to "high explosives trained personnel".
15.	Section 2.3	2	For consistency with the remainder of the paragraph, the addition of a descriptor is necessary within the second sentence of the paragraph.	Please change "The Operators" in the second sentence of the paragraph to "burn tray Operators".
16.	Section 4.1	2	The permit section referenced is not relevant to closure performance standards and should be removed.	Please remove the following from the first sentence of the section: "and in accordance to the requirements described in the Permit Section 9.4.7 Closure Plans".
17.	Section 5.5	4	Clarification must be added to the first sentence of the section to allow for the instance that a high explosives spot test is conducted on the metal pieces of equipment and the results are negative. In this event, flashing of the metal is not required and is prohibited by interim status requirements for the unit at TA-16-388.	Please add the following to the end of the first sentence of the section: "if a high explosives spot test is conducted and the results are positive or residual high explosives are expected on the equipment".
18.	Section 6.0	5	Reference to table within section is not correct within item "f." of the section.	Please remove "(see Table 4)" from item "f." within the section.

**Table 1. Specific Comments to Draft Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray (continued)**

<b>Comment No.</b>	<b>Section of Closure Plan</b>	<b>Page</b>	<b>Comment</b>	<b>Suggested Text Change</b>
19.	Section 6.1.2	6	Method referenced within item "c." is not the analytical method that is typically used to measure for high explosives within samples collected at the Facility. The method reference should be revised to include reference deemed more appropriate by Facility personnel to detect high explosives that may be present at the Facility. The instrumentation published in Method 8321A can be used to identify the required analytes that would not be detected using Method 8330B, thus a LANL-specific modification is used for Method 8321A to analyze for explosives compounds.	Please change "EPA Method 8330B" within item "c." to "EPA Method 8321A with a modification to add explosives compounds generated specifically at the Facility".
20.	Section 6.1.3	7	There are two typographical errors within the second sentence of the section.	Please change "tieh" to "with" and "Permit Section 11.10.2.12" to "Permit Section 11.10.2.11" within the second sentence of the section.
21.	Section 6.1.1	6	Clarification language is necessary to include added safety measures in the event that results of high explosives spot tests on samples are positive.	Please add the following to the end of the paragraph: "All samples must be tested by the high explosives spot test immediately upon collection and have a high explosives handler present when performing the sampling. If samples test positive on the high explosives spot test, they must be handled, packaged, stored, and transported from the site as material determined to present an explosive hazard."
22.	Section 6.3.2	8	The location of the sample on the sample label is often recorded as a short-hand for the location rather than the full GPS coordinates to accommodate for the size constraints of most labels. The GPS coordinates are recorded within the log book and the short-hand location that is included on the sample label is referenced in the logbook with the GPS coordinates and the sample identification number.	Please change "GPS coordinates recording the location the sample was collected" in item "e." to "the location the sample was collected".
23.	Section 6.4.1	9	Within the second sentence of the section, the term "Permittees" is not defined (see Comment 7).	Please change the term "Permittees" to "Facility personnel" within the second sentence of the section.
24.	6.5.1	9	There are two typographical errors within the section that make references to sections within the closure plan that do not exist.	Please change "Section 6.4.2 of this plan" to "Section 6.5.2 of this plan" within the first sentence of the section. Also, please change "Section 6.2.1" to "Section 6.0" within the first sentence of the second paragraph of the section.

**Table 1. Specific Comments to Draft Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray (continued)**

<b>Comment No.</b>	<b>Section of Closure Plan</b>	<b>Page</b>	<b>Comment</b>	<b>Suggested Text Change</b>
25.	Section 9.0	11	The term "Permittees" within the first sentence of the section is not defined (see Comments 7 and 23).	Please change the term "Permittees" to "Facility personnel" within the first sentence of the section.
26.	Table 2	15	There is a typographical error within the listing of "Specific Constituents" for "High explosives and associated compounds".	Please remove "PBX 9601" from the list of constituents.
27.	Table 2	15	Erroneous EPA Hazardous Waste Numbers must be removed for constituents of concern that were not constituents included within the hazardous wastes treated at the unit, but may have been used as fuel or could be by-products of treatment process.	Please remove the last two rows within Table 2 that include "Diesel Range Organics" and "Nitrates" and change the "Other constituents of concern" row to include: "Dioxins/furans, Perchlorate, <b>and</b> kerosene, <u>diesel range organics (such as carbon disulfide, BTEX, TPH), and nitrates</u> ".
28.	Table 3	16	Addition of a path forward for metal covers/trays that are not found to be hazardous.	Please add a row to the table that indicates that metal covers/trays that are found to be non-hazardous waste will be recycled or disposed of in a Subtitle D landfill.
29.	Table 3	16	Addition of a row to the table is necessary to include the firebrick associated with the unit.	Please add a row to the table that indicates that firebrick will be recycled or disposed of in a Subtitle C or D landfill.
30.	Figure 5	21	Removal of this figure is necessary, as it is not referenced within the closure plan.	Please remove Figure 5.