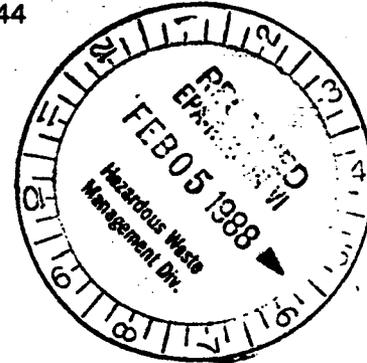




Department of Energy
 Albuquerque Operations
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael Burkhardt, Director
 New Mexico Environmental Improvement Division
 P. O. Box 968
 Santa Fe, NM 87504-0968

Dear Mr. Burkhardt:

MODIFICATIONS TO THE NOVEMBER 25, 1985 TA-16 AREA P LANDFILL CLOSURE AND POST-CLOSURE PLAN

The Department of Energy (DOE) did not choose to continue operation of the Technical Area (TA) 16 Area P landfill at Los Alamos National Laboratory (LANL) after November 8, 1985. Therefore, DOE did not apply for a Resource Conservation and Recovery Act (RCRA) permit at this site. Consequently, DOE was required under the loss of interim status provisions (40 CFR 270.10) to submit a Closure and Post-Closure Plan for this landfill. Pursuant to 40 CFR Section 265.1 (b), the DOE Closure and Post-Closure Plan dated November 25, 1985, for the Area P landfill reflected interim status standards for such activities. DOE recognizes, however, that upon receiving a RCRA operating permit, Area P post-closure (and possibly closure) activities will be subject to permitting standards (i.e., 40 CFR 264) rather than interim status standards (i.e., 40 CFR 265).

Under separate cover, the amendments are submitted with the intent that the Area P landfill fully comply with both standards. Equally important, however, is the collection of a consistent and reliable water quality data base from which critical decisions concerning potential statistically significant changes in individual water quality parameters can be made. Thus, the proposed ground-water quality monitoring program for Area P has been modified to reflect sufficient flexibility so that DOE will comply with both 40 CFR 265 and 264 requirements, even though only a single regulatory standard will be in effect at any given time.

LANL has installed several ground-water monitoring wells and neutron moisture log test holes to characterize potential ground-water movement. No ground-water has been detected in any monitoring well; hence, DOE has requested a ground-water monitoring waiver for the Area P landfill. Should recoverable amounts of ground-water appear in the future, then DOE will proceed to monitor it pursuant to the plan detailed in the enclosed



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Mr. Michael Burkhart

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Appendix F. If, at that time, DOE is operating under a RCRA permit rather than interim status, then the required ground-water monitoring program would implement appropriate DOE responses (i.e., either detection, compliance, or corrective action monitoring) necessary to comply with permitting standards.

The enclosed modifications to the previously submitted Closure and Post-Closure Plan dated November 25, 1985, are summarized on the enclosed cover sheet. Please remove the indicated pages from the November 25, 1985 plan, and replace them with the enclosed changes as indicated. In addition, several new appendices are enclosed and should be added to the original plan; these are contained in a separately bound volume.

Finally, an independently prepared geohydrologic report is enclosed for your information. This report contains laboratory testing results from selected core samples recovered from the Area P landfill. If you have any questions, please contact Mr. James Phoenix of my staff at 667-5288.

Sincerely,


Harold E. Valencia
Area Manager

8189A

Enclosures:
As Stated

cc:
A. Davis, U. S. EPA, Region VI, Dallas, TX 75270
A. Tiedman, LANL, ADS, MS A120
T. Gunderson, LANL, HSE-DO, MS K491

VOLUME I OF II

TA-16 AREA P LANDFILL CLOSURE AND POST-CLOSURE PLAN

LOS ALAMOS NATIONAL LABORATORY
LOS ALAMOS, NEW MEXICO

Originally Prepared by:

DELTA H ENGINEERING, LTD.
Santa Fe, New Mexico

November 1985

Modified by:

LOS ALAMOS NATIONAL LABORATORY
ENVIRONMENTAL SURVEILLANCE GROUP HSE-8
LOS ALAMOS, NEW MEXICO 87545

January 1988

VOLUME II OF II: APPENDICES D THROUGH H
TA-16 AREA P LANDFILL CLOSURE AND POST-CLOSURE PLAN

LOS ALAMOS NATIONAL LABORATORY
LOS ALAMOS, NEW MEXICO

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January 1988