



NEW MEXICO
HEALTH AND ENVIRONMENT
DEPARTMENT

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HAZARDOUS WASTE BUREAU

GARREY CARRUTHERS
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CARLA L. MUTH
Secretary

MICHAEL J. BURKHART
Deputy Secretary

September 30, 1988

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

P 456 379 867

FA 16
Mr. Harold E. Valencia
Area Manager
U.S. D.O.E. Area Office
Los Alamos, New Mexico 87544

RE: NM 0890010515
TA-16 Surface Impoundment Closure

Dear Mr. Valencia:

Enclosed for your information are a public notice and fact sheet concerning the closure of the TA-16 Surface Impoundment. The public notice will be published on or about October 16, 1988. The closure plan administrative record will be available at the Santa Fe office of the Hazardous Waste Section and the Espanola public library for public review.

As part of the review and approval process, you are requested to comment on the following specific items concerning the plan as submitted. Your responses will be considered in the decision to approve or disapprove the plan. Please provide your comments by the end of the public comment period, December 9, 1988.

1. Paragraph 5.1.4.1 describes soil borings through the liner. Two samples are not statistically sufficient to establish that the liner has not leaked. Please provide a more adequate sampling plan. Similarly, two samples are not adequate for background determination.
2. Paragraph 5.1.4.1 proposes that organic constituents may not be present. This is invalidated by DOE letter of July 30, 1987. Please provide a more adequate analysis plan.
3. Paragraph 5.1.6 proposes that the laboratory will prepare a risk assessment for EID approval and/or negotiation. HWMR-4, Section 206. C.6.f.1. address clean closure by removal of wastes and residues. Please provide any data accumulated to date to establish that no wastes or residues will remain in the soil or groundwater. Such data should include, but is not limited to, the following:



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U.S. D.O.E. Area Manager
September 30, 1988

- a. Complete logs of any wells or borings.
- b. An accurate map showing the locations of any wells or borings and the impoundment.
- c. Complete field testing data.
- d. Any interpretative data or opinion, identified by author.
- e. An accurate drawing showing the as-built plumbing to the wastewater treatment unit and isolation of the surface impoundment.
- f. A description of the waste removal and disposition.
- g. Risk assessment calculations based, at a minimum, on a 95% confidence level. See 52FR8704 (March 19, 1987) for guidance. All media, soil, air and water, should be addressed.
4. Paragraphs 5.1.2.4. and 5.1.7. decontamination efforts must be better detailed to establish adequacy. Where will individual equipment be decontaminated and how decontamination materials will be controlled should be detailed.
5. We are concerned that LANL intends to resume use of this impoundment after closure. Please describe what changes have been or will be made to ensure that hazardous wastes will not re-enter the unit; or if they will, what management will occur so that the appropriate regulations will be observed.

If you have any questions please call me at 827-2923.

Sincerely,



C. Kelley Crossman
Permitting Supervisor

CKC:to

cc: Janie Hernandez
US EPA (6H-HS) w/enc1.