

Los Alamos National Laboratory

Hazardous and Solid Waste Group (ESH-19)

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Date: April 24, 2000
Refer to: ESH-19:00-037

Mr. John E. Kieling, Program Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044-A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502-6110

Dear Mr. Kieling:

SUBJECT: Partial Implementation of TA-16 Industrial Incinerator Closure Plan

The purpose of this letter is to inform you that activities contained in the RCRA closure plan for the TA-16 incinerator will be started within the next two months. These activities will involve the disposition of the metal incinerator components located on the incinerator pad. The equipment will be removed, characterized, and recycled as scrap metal as described in the closure plan submitted to your office on November 8, 1999. The full title of the closure plan is "Los Alamos National Laboratory Closure Plan, Technical Area 16 Industrial Incinerator, Revision 0, October, 1999."

The early disposition of the incinerator components is being undertaken to take advantage of the availability of contractor resources currently on site for the nearby Material Disposal Area P closure. This represents a savings in taxpayer supported funding and an opportunity to address the equipment removal at an earlier time than indicated by the closure plan review schedule.

This activity will be performed with the understanding that it proceeds "at risk" within the meaning of that term as we have discussed with your staff in several previous closure projects. That is, additional procedures could be required for this activity after your office has completed its review of the closure plan. However, we believe that the procedure for equipment disposition described in the closure plan is sufficiently protective of the public and environment and that a precedent has been established for this type of activity with the closure of the TA-50 Controlled Air Incinerator in 1997. This approach was informally discussed with Michael Chacon of your staff on March 29, 2000, and no concerns were noted at that time.

As stated in the closure plan, the decommissioned metal incinerator components will be salvaged for metal recycling in accordance with 20 NMAC 4.1, Subpart II, 261.6(a)(1), 261.6(a)(3)(iii), and 261.4(a)(13). Incinerator components that cannot be recycled will be sampled, analyzed, and disposed of appropriately. Operating records, including



TA/16

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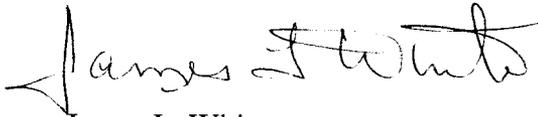
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documentation of the removal, transportation, and final disposition of the metal incinerator components, will be maintained to verify the decontamination as required by Section 3.0 of the closure plan.

If you should have any questions or concerns regarding this activity, please feel free to contact me at 665-0677 or Gian Bacigalupa at 667-1579.

Sincerely,



James L. White
Group Leader

JW/GB/vh

Cy: James P. Bearzi
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