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JUL 2000  
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Date: July 11, 2000  
 Refer to: ER2000-0326

Mr. John Kieling  
 NMED-HRMB  
 P.O. Box 26110  
 Santa Fe, NM 87502

**SUBJECT: ADDITIONAL INFORMATION ASSOCIATED WITH THE CLOSURE PLAN FOR THE TA-16-394 BURN TRAY**

Dear Mr. Kieling:

The purpose of this letter is to provide additional information to supplement Los Alamos National Laboratory's (LANL's) Closure Plan for the TA-16-394 Burn Tray (LA-UR-99-6216), as requested by New Mexico Environment Department Hazardous and Radioactive Materials Bureau (NMED-HRMB) personnel. This additional information was requested by NMED-HRMB personnel during an April 4, 2000 informal meeting and subsequently discussed during an April 12, 2000 tour of the TA-16-394 Burn Tray. To facilitate review of this additional information, the closure plan section, section title, and topic requiring clarification have been included and are followed by LANL's response.

***Section 3.1 Description of Waste and Estimate of maximum Inventory of Hazardous Waste, paragraph 1 - NMED-HRMB would like a more detailed description of the sources of HE-contaminated wastes and the procedures used to determine the wastes treated at the TA-16-394 Burn Tray.***

The sources of HE-contaminated wastes that have been treated at the TA-16-394 Burn Tray are primarily generated at TA-9 and TA-16, and include:

- HE-contaminated water with solvent waste consisting primarily of water and solvent from laboratory analysis and/or from HE processing
- Spent solvent waste consisting of spent solvents used to dissolve HE and polymers and spent solvents from laboratory analysis
- HE-contaminated used oil originating from hydraulic presses and lubrication systems associated with HE-machining operations
- Liquid acids, bases, and/or inorganic salt wastes consisting of materials used as titrates, solvents, cleaning fluids, and/or materials from hydrolysis research.

HE-contaminated liquid wastes generated at LANL are managed either at the TA-16 HE Waste Treatment Facility (HEWTF) or at the TA-16-394 Burn Tray. Generators of HE-contaminated liquid wastes complete waste profile forms (WPFs) to document all information regarding waste generation and characterization. Information on the WPFs

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is evaluated against the waste acceptance criteria (WAC) of the HEWTF to determine whether the HE-contaminated liquid waste is managed at the HEWTF or the TA-16-394 Burn Tray. HE-contaminated liquid wastes that meet the WAC are treated at the HEWTF; other HE-contaminated liquid wastes are treated at the TA-16-394 Burn Tray. WPFs documenting the HE-contaminated liquid wastes treated at the HEWTF or the TA-16-394 Burn Tray are on file and available for NMED-HRMB review, upon request.

**Section 3.2.1 Phase I Activities (b) Sand and Gravel, paragraph 2 - NMED-HRMB believes that one grab sample of sand should be collected to characterize the sand and gravel for disposal.**

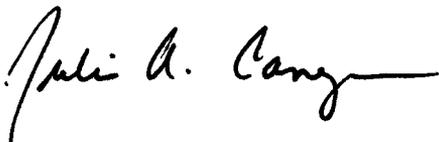
LANL agrees that one sample of sand should be collected and analyzed to characterize the sand and gravel for disposal. Collecting and analyzing one grab sample of sand would avoid any difficulty associated with laboratory analysis of gravel, and the analytical results from the sand would be considered conservatively representative of the waste stream (sand and gravel).

**Section 3.2.2 Phase II Activities (a) Screening Levels, paragraph 4 - NMED-HRMB would like to know the likely path forward for any total petroleum hydrocarbon (TPH)-contaminated material generated during closure activities.**

LANL believes that it is likely that wastes generated during closure activities that are contaminated with TPH will also contain other potential contaminants (i.e., solvents and/or metals). These wastes will be characterized and disposed appropriately, as outlined in the closure plan. If, although unlikely, any materials contaminated with TPH (and no other contaminants) are generated during closure activities, they will be appropriately characterized and disposed as solid waste, in accordance with the New Mexico Solid Waste Regulations (20 NMAC 9.1).

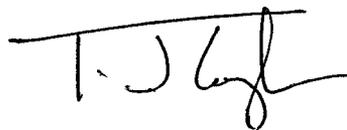
If you have any questions, please call Dave McInroy at (505) 667-0819 or Joe Mose at (505) 667-5808.

Sincerely,



Julie A. Canepa, Program Manager  
Los Alamos National Laboratory  
Environmental Restoration

Sincerely,



Theodore J. Taylor, Program Manager  
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Los Alamos Area Office

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