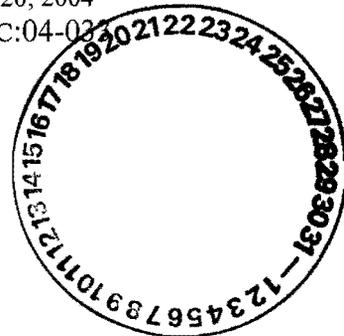


TA-16

Solid Waste Regulatory Compliance
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: April 20, 2004
Refer to: SWRC:04-03



Carl Will, RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

SUBJECT: Revised Schedule for Technical Area 16 Closure Plan for the TA-16-401 and 406 Sand Filters

Dear Mr. Will:

We are requesting that the schedule for the closure of the TA-16-401 and 406 Sand Filters be revised as shown on revised Table 1, attached hereto. The change is necessary because the TA-16 Burn Ground of which the Sand Filters are a part of, has been operated frequently recently to flash a considerable quantity of the piping generated by the decommissioning of an explosives facility at LANL. The piping has been characterized as reactive and must be flashed at TA-16-388 within 90 days of generation to meet hazardous waste accumulation requirements. It is important that flashing be completed before high fire danger closes down TA-16 Burn Ground operations for the summer. Safety concerns prevent simultaneous operations of TA-16-388 and closure of the TA-16-401 and -406 sand filters. Recent rainfall created lower fire hazard conditions and it is our hope that the TA-16 Burn Ground will be able to operate through the end of May before fire restrictions curtail operation. The enclosed schedule anticipates starting closure activities by June 1, 2004, and completing them within 180 days. If high fire danger occurs before June 1, closure activities may commence earlier.

We appreciate your assistance. If you have any comments or questions regarding the schedule, please contact me at (505) 665-0451 or Ann Sherrard, LANL, at (505) 665-7226

Sincerely,

Tony Grieggs
Tony Grieggs
Group Leader

TG:AS:vc



Cy: Laurie King
New Mexico/Federal Facilities Section
Environmental Protection Agency
Region 6 1445 Ross Avenue, Suite 1200
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SWRC File, MS K490
IM-5, MS A150

**Table 1
Closure Schedule**

An estimated total of 180 days will be required to accomplish closure procedures and reporting requirements. The year of closure for the sand filters is 2003. Closure will proceed according to the schedule below:

Activity	Estimated Completion Date
Activities Prior to Closure Plan Approval	
Notify NMED by Submitting Closure Plan	April 2003
Procure Equipment and Subcontractors	May 2003
Final Receipt of Wastes	NA
Final Treatment of Wastes	NA
Activities After Closure Plan Approval	
NMED Approval of Closure Plan	January 19, 2004
Begin Closure Activities	June 1, 2004
Remove Sand, Gravel, and Firebrick Components	June 10, 2004
Segregate Sand, Gravel, and Firebrick	June 10, 2004
Evaluate Firebrick for Reuse or Disposal	June 15, 2004
Remove Metal Blowers	June 22, 2004
Treat Firebrick (if necessary)	July 1, 2004 ¹
Sample Firebrick and Submit for Analysis (if necessary)	June 15, 2004
Treat Blowers	July 22, 2004 ¹
Inspect Steel Vessels	July 1, 2004
Sample Sand and Submit for Analysis (if necessary)	July 7, 2004
Repair or Remove Steel Vessels (if necessary)	July 30, 2004
Collect Soil/Tuff Samples for Analysis (if necessary)	September 15, 2004
Treat Steel Vessels (if necessary)	September 15, 2004 ¹
Replace Sand and Gravel (if vessels intact or repaired)	October 7, 2004
Evaluate Soil/Tuff Analytical Data (if necessary)	September 30, 2004
Remove Contaminated Soil/Tuff (if necessary)	October 15, 2004
Collect Additional Soil/Tuff Samples for Analysis (if necessary)	October 22, 2004
Decontaminate Equipment (if necessary)	October 22, 2004
Evaluate Analytical/Waste Characterization Data (if necessary)	November 1, 2004
Send Contaminated Media to Disposal Facility (if necessary)	November 15, 2004
Restore Site (if necessary)	November 15, 2004
Submit Closure Certification to NMED	December 1, 2004

¹Treatment of HE-contaminated components can only be completed if fire danger is low enough to allow the TA-16 Burn Ground to operate. If it cannot operate, treatment will occur as soon as possible after operations restart.