



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

SEP 11 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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 Management Program  
 Hazardous and Radioactive Materials  
 Bureau  
 New Mexico Environment Department  
 2044 Galisteo Street, Bldg. A  
 P. O. Box 26110  
 Santa Fe, NM 87505

Red LANL TA-21-61 1997

Dear Dr. Dinwiddie:

Subject: Los Alamos National Laboratory (LANL) Technical Area 21, Building 61  
 (TA-21-61) - Status of Closure Activities

The purpose of this letter is to provide the information that you requested at the August 12, 1997 permit issues meeting regarding the mixed waste Container Storage Area (CSA) at LANL TA-21-61. Your request was for a discussion of the current status for the final closure activities at this unit due to the length of time this project has taken. The project has required four decontamination events with associated sampling and analysis. In addition, there has been a potable water spill and an associated sampling event as discussed in the final follow-up spill report sent to you on July 9, 1997. The final closure certification report for this closure project is currently being prepared and reviewed for submittal to the Hazardous and Radioactive Materials Bureau (HRMB) by October 30, 1997. The remainder of this letter provides more information about these items.

The inside CSA at TA-21-61 was originally identified as an interim status mixed waste storage area in the LANL Mixed Waste Part A Permit submitted to HRMB on January 25, 1991. A site-specific interim status closure plan was developed for this area as required by the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20 NMAC 4.1), Subpart VI, §265.112(a). The closure plan was amended and submitted to HRMB in March 1996 after the LANL waste management operations groups decided that storage capacity was not needed and closure of the unit should be started. That closure plan received HRMB review resulting in a Notice of Deficiency, and subsequent plan revisions were submitted in August 1996. The closure activity at the CSA was initiated in September 1996 using the procedures detailed in the closure plan.

There have been four sampling events since initiation of the closure. The original closure decontamination washdown was performed on September 23, 1996. Samples taken from the used washwater demonstrated that mercury and hexachlorobutadiene were present at trace levels. This area had been used for storage of used fluorescent light bulbs and the positive mercury data was consistent with the prior CSA activities. Further decontamination was planned.



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Robert S. Dinwiddie

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On December 24, 1996, a potable water pipe froze and broke in the building, flooding the CSA secondary containment. The spill was reported to your office by telephone that day, and a subsequent preliminary report was sent to HRMB on December 27, 1996. This resulted in a need to postpone closure activities pending resolution of the spill event. The history of the spill was presented in the final spill report sent to HRMB on July 9, 1997. As described in that report, the spill water analysis demonstrated that no significant contaminants were detected in the water retained in the containment.

The secondary containment area washdown and sampling event took place on February 27, 1997. Analytical results for the washwater demonstrated the presence of toluene at less than part per million levels. Although historical records did not account for this constituent and it had not been detected in the previous sampling efforts, LANL proceeded with further decontamination. The third decontamination washdown procedure was initiated on May 22, 1997. These washwater samples did not meet the quality assurance procedures for statistically defensible data.

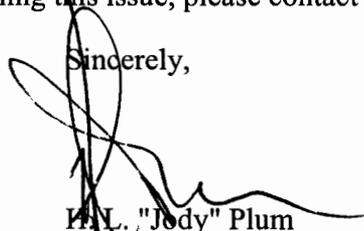
The fourth decontamination washdown occurred on July 14, 1997. The sample results from that washwater showed no detectable hazardous constituents except for trace levels of methyl isobutyl ketone (MIBK). Specifically, a duplicate sample contained MIBK at a level of 1 microgram/liter (part per billion) above detection limit. This compound had not been detected prior to this point and could not be explained by the historical waste management activities at the site. These results suggested that any remaining contamination in the CSA was not significant and the decision was made to discuss the final resolution of the decontamination demonstration with this office.

This history of the decontamination sampling and analytical events was presented to you during the permit issues meeting of August 12, 1997. It is our understanding from that meeting that the closure activities to this point are sufficient to demonstrate decontamination of the CSA. As discussed, this determination is based on the absence of the originally detected and historically traceable hazardous constituents in the last washwater samples, and the fact that the MIBK concentration level in the washwater does not exceed the uncertainty range for the method detection limit.

The detailed discussion of the closure project and decontamination results will be included in the final closure report for this project. The report is being developed by the required independent certified engineer. After review by LANL facility representatives, the report should be available to HRMB by October 30, 1997.

We appreciate the ongoing comments and suggestions that you and your staff have provided in the regularly scheduled permit issues meetings regarding this closure project. If you have further questions or comments concerning this issue, please contact me at (505) 665-5042.

Sincerely,



H.L. "Jody" Plum  
Office of Environment

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