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

RECEIVED  
 REGION VI  
 26 MAY 24 AM 10:54  
 HAZARDOUS WASTE MGMT. DIV.

MAY 18 1988

*Marc*

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael Burkhardt, Director  
 N. M. Environmental Improvement Division  
 P. O. Box 968  
 Santa Fe, NM 87504-0968

*Permits*

NM0890010575

Dear Mr. Burkhardt:

CERTIFICATION OF CLOSURE

Enclosed please find two certifications of closure prepared by the owner and operator of the Los Alamos National Laboratory and by Mr. Lauren Ames, an independent, certified engineer (see enclosures #1 and #2, respectively). As you know, submission of these certifications is required by New Mexico Hazardous Waste Management Regulations following the completion of closure of hazardous waste management units. Closure has been completed at two areas used to store high explosives, namely Technical Area (TA) 22, Building 24 and TA 40, Building 2.

As members of your staff have been informed (Mr. Jack Ellvinger and Mr. C. Kelly Crossman), some exceptions to the closure plans approved by the New Mexico Environmental Improvement Division were necessary. These exceptions were as follows: (1) laboratory soap was not initially used to clean the storage areas as originally proposed because of its adverse effect on analytical equipment measuring organic constituents; (2) the time allowed for closure, 98 days (NOTE: significantly less than the 180 days allowed by the New Mexico Hazardous Waste Management Regulations), was exceeded in the closure of TA-24-22. This was due to the difficulty in removing total cyanides believed to be associated with the glue used to fasten the floor covering. The Department of Energy (DOE) has, after four decontamination efforts, effected successful removal of the compound within the time allowed by the regulations (see enclosure #3) and now considers the area closed; and, (3) minute quantities of barium were detected in the final wash water at TA-40-2. However, the levels indicate a significant decrease in concentration occurred following three decontamination efforts (see enclosure #3). Mr. Crossman suggested if DOE could achieve a decrease of one order of magnitude from the second decontamination effort, this would suffice to demonstrate effective closure. The concentration decreased from 5.68 mg/l after the first washing, to 1.916 mg/l following the second event, to 0.78 mg/l after the third washing. As you can see from the final result, the concentration decreased nearly an order of magnitude. DOE considers this area closed.

1084  
 TA-22



2140

Mr. Michael Burkhart

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As in the lithium hydride storage area closure recently performed, analytical results of wash water from both before and after decontamination reflect trace levels of three hazardous constituents (butyl benzyl phthalate, bis-(2-ethylhexyl)phthalate, and di-n-octyl phthalate). DOE has attributed their presence to the decontamination equipment itself rather than residual hazardous materials from the facility. One compound was found only in the used wash water and not in the clean water; however, it was detected in the clean water during the last closure activity conducted at the lithium storage area. DOE has therefore assumed that it was also associated with the decontamination equipment. There is little doubt that, had this compound actually been present in the storage area prior to decontamination, it would not remain after four washings.

If you should have any questions regarding this submittal, please contact Mr. James Phoenix (667-5288) of my staff.

Sincerely,

  
Harold E. Valencia  
Area Manager

8659A

3 Enclosures

cc w/enclosures:

EPA Region VI, Dallas, Texas

A. Tiedman, LANL, ADS, MS A120

M. Martz Emerson, LANL, (HSE8-88-260-1, 5/6), HSE-8, MS K490

ENCLOSURE #1

I certify under penalty of law that the hazardous waste management units at TA-22-24 and TA-40-2 have been closed pursuant to the the specifications in the approved closure plan with the exception of the issues discussed with EID and noted in the accompanying transmittal letter. The closure was performed under my direction in accordance with a system designed to assure that qualified personnel properly conduct closure activities. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for closure activities, the closure was conducted as specified. I am aware that there are significant penalties for submitting false information, including the possibility of fines or imprisonment for knowing violations.

  
Siegfried S. Hecker  
Director  
Los Alamos National Laboratory  
Operator

5/12/88  
Date Signed

  
Harold E. Valencia  
Area Manager, Los Alamos Area Office  
U. S. Department of Energy  
Albuquerque Operations  
Owner

5-17-88  
Date Signed

ENCLOSURE #2

# Santa Fe Engineering, Ltd.

POST OFFICE BOX 1764

SANTA FE, NEW MEXICO 87504-1764

(505) 988-7438

April 29, 1988

To Whom It May Concern:

I have observed the closure of the following areas at Los Alamos National Laboratory:

TA-22-24 Magazine Container Storage Area  
TA-40-2 Magazine Container Storage Area

With the exceptions noted in the attached letter from Harold Valencia to Michael Burkhart, both closures were performed in accordance with the plans dated September, 1985 and ammended December, 1985.



Lauren B. Ames, P.E.  
NM #10254



ENCLOSURE #3