



State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
 Harold Runnels Building  
 1190 St. Francis Drive, P.O. Box 26110  
 Santa Fe, New Mexico 87502  
 (505) 827-2850

Judith M. Espinosa  
 Secretary

Bruce King  
 Governor

Ron Curry  
 Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 26, 1991



Mr. Jerry L. Bellows, Area Manager  
 Los Alamos Area Office  
 Department of Energy  
 528 35th Street  
 Los Alamos, New Mexico 87544-5000

RE: TA-40 SCRAP DETONATION SITE CLOSURE PLAN COMMENTS  
 (NM0890010515)

Dear Mr. Bellows:

On March 25, 1991, the New Mexico Environment Department (NMED) received an official copy of the TA-40 Scrap Detonation Site Closure Plan from the Department of Energy (DOE). NMED considers that the plan which was delivered to State personnel during their visit to the Los Alamos National Laboratory (LANL) on February 8, 1991 meets the submittal deadline established in our January 25, 1991 letter to DOE and LANL since no substantive changes appear in the final plan. The plan is for final closure of a waste explosives open burning/open detonation unit according to the requirements of the New Mexico Hazardous Waste Management Regulations (HWMR-6), Part VI, 40 CFR 265 Subpart P.

NMED completed a review of the closure plan and our comments are enclosed for your consideration. Please submit your response to these comments within 30 days of your receipt of this letter.

Please contact Mr. Marc Sides at (505) 827-2749 if you have any questions or require further assistance.

Yours truly,

*A. Elizabeth Gordon, Ph.D.*

A. Elizabeth Gordon, Ph.D., Permitting Supervisor  
 Radioactive and Hazardous Waste Bureau

Enclosure

cc: Laurie Burch, (6H-PC) EPA Region 6



2455

TC

## TA-40 SCRAP DETONATION SITE

### CLOSURE PLAN COMMENTS

1. Section 3.6, Post-Closure Plan; Section 3, Page 3:  
Post-closure care monitoring requirements may be required if clean closure of the unit can not be demonstrated.
2. Section 3.7, Final Closure Report; Section 3, Page 4:  
LANL should include in the report the description and the amount of regulated and nonregulated materials disposed.
3. Section 4.1.2.1, Burn Cage; Section 4, Page 5:  
The surface sample described in the first paragraph needs to be located on figure 4.2.
4. Section 4.1.3.2, Equipment and Structures; Section 4, Page 8:  
The closure plan states that the purpose of the sampling is to determine if any contaminants are present on the structures that may require decontamination of the structures prior to disposal. This method needs to be revised to state that the equipment and structures, (e.g. the wire cage and several plate steel wiring boxes) which are integral components of the OB/OD unit are considered hazardous waste and must be disposed of as such, or be decontaminated. The unit components must be considered hazardous until it is proved otherwise. NMED recommends a triple steam cleaning. A laboratory analysis of the rinseate from the third cleaning may be used to determine the success of the decontamination procedures. LANL has the option of disposing of the unit structures and equipment as hazardous waste without conducting the decontamination, sampling, and analysis activities.
5. Section 4.1.3.3, Scattered Debris, Section 4, Page 8:  
The closure plan should clarify the appropriateness of taking a rinseate wash of scattered debris. Is this an EPA approved method of SW-846 or another approved method? Is a leaching procedure to be employed? How does washing debris with a slow stream of distilled water and sampling and analyzing the catch water correlate to establishing clean closure constituent limits of the debris? The sampling and analytical method for establishing clean closure criteria for the debris needs to be revised or the "rinseate wash" methodology needs to be explained in greater detail in the closure plan.
6. Section 4.2.1, Metals and Cyanide, Section 4, Page 11:  
The TCLP is a leaching procedure used to determine whether or not a solid waste is also a hazardous waste. The TCLP constituent concentrations above which a waste is considered hazardous can

not be used to establish soil clean-up levels. A total digestion method of sample preparation and analysis is needed for comparing total concentrations present in soils to the health-based criteria.

7. Section 4.3, Sampling Methods, Section 4, Page 19:  
The closure plan needs to state that discrete samples (versus composite samples) will be collected and analyzed when comparing media hazardous constituent concentrations with health-based criteria.

8. Section 4.3.5, Sampling Equipment decontamination, Section 4, Page 20: The closure plan should specify that the equipment decontamination drainage rinse area will be lined with plastic or another type of impermeable lining which prevents infiltration of the rinse water into the surrounding soils.

9. Section 4.4, Sample Handling and Documentation, Section 4, Page 30: This section of the closure plan should indicate in the first paragraph that estimated wind speed and direction are pertinent field conditions which are to be recorded on the Hazardous Material Sample Analysis Request.

10. Section 4.6, Site Decontamination, Section 4, Page 25:  
All references to the draft 40 CFR 264 Subpart S need to be removed from the closure plan. This is a draft document subject to public comment and further revision. Closure plan decision-points which are based on draft methods may be subject to further verification, if those draft methods are later modified (if and) when Subpart S is promulgated.

This section of the closure plan should be revised to indicate that, "Soils will be considered "contaminated" that contain regulated constituent levels above NMED approved health-based criteria."

11. Section 5.1.1, Material Excavation, Section 5, Page 1:  
The closure plan need to explain in greater detail the correlation between the depth and aerial extent of material to be excavated and the sample results that triggered that excavation activity. (For example, how are the limits of excavation determined from the sampling results?)

12. Section 5.1.3, Equipment Decontamination, Section 5, Page 1:  
The excavation equipment should be steam cleaned or a more thorough explanation should be provided for the method of washing and rinsing of equipment. This is needed because no laboratory analysis to demonstrate the success of decontamination is proposed.

13. Section 6. Schedule, Section 6, Page 2:  
The closure schedule includes "site restoration". Please include a brief narrative in the closure plan relating to what these activities are.