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

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Edward Horst, Program Manager
Radioactive and Hazardous Waste Bureau
State of New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502



Dear Mr. Horst:

The purpose of this letter is to formally document sampling strategy changes to the TA-40 Scrap Detonation Site Closure Plan. These changes were discussed and agreed to by Marc Sides of your staff and Larry Maassen of the Los Alamos National Laboratory (LANL) Environmental Restoration (ER) Group.

The changes are as follows:

1. The surface area around the wire cage will be sampled as described in Section 4.1.2.1 of the closure plan. If the material around the cage is determined to be hazardous, then all of the overlying surface debris in that area, including the cage, will be considered to be hazardous. If these samples reveal no hazardous materials, then the wire cage will be considered nonhazardous.

The rationale for this change is based on the observation that the wire cage contains very little charred debris on the frame; all of the charred remains fell to the ground and were presumably not removed. Therefore, if the ground is contaminated with hazardous materials, the cage is also. The reverse holds true if the ground is not contaminated.

2. The steel wiring boxes and plate steel personnel shelter will be considered contaminated with hazardous materials only if other sampling efforts (Section 4.1.1, Fill Area Sampling; or Section 4.1.3.1, Surface Drainages) reveal there is a potential for these structures to be contaminated. If hazardous materials are present, these structures will either be decontaminated, or disposed of as hazardous waste.

The rationale for this change is based on the fact that the surfaces of these structures have been exposed to the weather for about 20-25 years and consist of rusted shells. They would only be contaminated near or below the ground surface and only if that ground material contains hazardous materials.

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3. The scattered debris will be collected as described in Section 4.1.3.3. However, instead of steam cleaning, the material will be rinsed in distilled water and the rinsate will be analyzed.

This change is made because this is the most practical and common method of determining contamination on the types of materials expected to be found in the vicinity.

These changes will help conserve ER Program resources, while fulfilling the objective of defining any environmental hazards that might exist. We appreciate the exchange of information on this issue at the informal level. We would appreciate a formal reply on this request so a complete record can be maintained at LANL.

If you have any questions, please contact Steve Slaten at 665-5050.

Sincerely,



Karl J. Twombly, Chief
Environment, Safety & Health Branch

5SS-002

cc:

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