



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

*Barbara ✓
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 File Red ✓*

FEB 10 1993



Ms. Barbara Hoditschek
 Permit Program Manager, HRMB
 New Mexico Environment Department
 1190 St. Francis Drive/P.O. Box 26110
 Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:

A letter from your office, dated December 17, 1992, which was addressed to Jerry Bellows, requested documentation supporting the closure of the Technical Area 40 Scrap Detonation Site. The Closure Plan (Plan) for this site was written by Los Alamos National Laboratory (Laboratory) and approved by the Hazardous and Radioactive Materials Bureau (HRMB) on September 13, 1991. Both the Laboratory and HRMB were aware that analytical results from previous sampling events, suggested little or no contamination at the site. The Plan was written in such a manner that if contamination was detected an amendment to the Plan would have to be developed.

During the various sampling phases of this closure, hazardous constituents were detected above health-based risk levels at several locations throughout the site. The hazardous constituents consisted of lead, antimony, beryllium, and thallium. Mark Sides of your staff was informed verbally of these findings as the analytical results became available.

Because the Laboratory believes that the discovery of these constituents is an unexpected event as found in the New Mexico Hazardous Waste Management Regulations (HWMRJ-7), Part VI, Section 40 CFR 265.112(c)(3), we are requesting that your office allow us to amend the Plan. The amended Plan would include Phase V sampling as described in Section 4.1.5, and a sampling strategy to define excavation limits necessary to remove contaminants as described in Section 4.7 of the approved plan. The approved Plan included these two sections describing additional work, but they were not included on the schedule illustrated in Section 6, page 2 of the Plan. The Plan was intentionally written to exclude this additional work from the schedule, knowing that additional phases of sampling would not be completed by February.



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Ms. Barbara Hoditschek

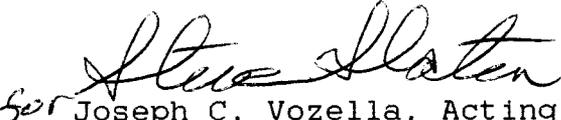
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FEB 10 1993

An amendment to this Closure Plan is in its final stages of completion. It is anticipated that the addendum could be delivered to your office no later than **February 19, 1993**. Within the amendment, the Laboratory will include a revised schedule, with a remobilization of the field team for the above-mentioned activities in early Spring. It is necessary that the Laboratory delay the addition field activities until the upcoming Spring because the site is currently inaccessible due to the accumulation of snow at the site.

Should you have any questions, feel free to contact Steve Slaten of my staff at 665-5050.

Sincerely,


for Joseph C. Vozella, Acting Chief
Environment, Safety, and Health
Branch

LESH:9SS-001

cc:

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