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LANL Red 95
TA-40

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 28, 1995

Mr. Larry Kirkman
Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, NM 87544



Dear Mr. Kirkman:

RE: Conditional Approval of TA-40 Scrap Detonation Site Final Closure
EPA ID No. NM 0890010515-1

The New Mexico Environment Department (NMED) has determined, pursuant to the requirements of the New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1, Subpart IX, §270.1(c)(5) and (6), that the Department of Energy/Los Alamos National Laboratory (DOE/LANL) has successfully demonstrated clean closure for the former site of the Scrap Detonation Site (SDS) in Technical Area 40 (TA-40). The SDS is defined in the approved final closure plan as consisting of a burn area, a detonation area, and the surrounding area centered near NMSP coordinates E481920, N1767000. The clean closure determination was based on an administrative and technical review of the closure report with accompanying certification submitted to NMED on March 27, 1995.

Based on this closure report and its findings, NMED has determined that the soil and groundwater beneath the closed site have no demonstrated potential to be impacted by the hazardous waste once treated at the former site of the TA-40 SDS. In addition, DOE/LANL has successfully demonstrated under 20 NMAC 4.1, Subpart V, §264.90(c)(1) that all waste, waste residues, contaminated containment system components, and contaminated subsoils associated with the TA-40 SDS were removed or decontaminated at closure.

However, contamination remains in the burn pit west of the site designated as Burn Area East. As described in the closure report, this contamination is associated with hazardous waste management activities subject to corrective action under the Hazardous and Solid Waste Amendments (HSWA) and not Resource and Conservation Recovery Act (RCRA) closure requirements for interim status units. Therefore, DOE/LANL will address corrective action at this burn pit



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as part of environmental restoration activities conducted within Field Unit 5.

During a site visit by NMED staff Frank Sanchez and Steve Zappe conducted on July 11, they observed gross discrepancies between the locations of the Burn Cage and Burn Area East on Figures 2 and 3 of the Closure Certification Report and their field observations. This report cannot be accepted as complete until the locations for both areas and their associated sampling locations are accurately represented on a map. NMED suggests the locations currently shown in Figure 3 of the Closure Certification Report be presented in a manner similar to that used in Figure 2.1 of the May 1993 Amendment to the Final Closure Plan.

NMED will approve clean closure of the former Scrap Detonation Site located in TA-40 upon receipt of a map which accurately depicts the sampling locations and extent of excavations conducted during cleanup activities. The effective date of approval of clean closure for this unit will be the date of acceptance of the corrected map by Barbara Hoditschek, RCRA Permits Program Manager in NMED's Hazardous and Radioactive Materials Bureau.

If you have any questions, please contact Steve Zappe of my staff at (505) 827-4308.

Sincerely,



Ed Kelley, Ph.D.
Director, Water and Waste Management Division

EK:SOZ:soz

cc: David Neleigh, EPA Region 6
Benito Garcia, Chief HRMB
Barbara Hoditschek, HRMB
Ron Kern, HRMB
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