



**STATE OF NEW MEXICO**

ENVIRONMENTAL IMPROVEMENT DIVISION  
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DENISE FORT, DIRECTOR

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Comments on the Closure Plan for the TA-50-1 Container Storage (Unpermitted)  
and Treatment Area, LANL

1. The plan is marked "ROUGH DRAFT," and so does not bind LANL to any closure activities. This is not acceptable.
2. No container storage in TA-50-1 has ever appeared on any Part A permit application submitted by LANL; this area does not have interim status as a storage area, may not be used for storage greater than 90 days, and is not subject to closure. It is assumed by EID that the "storage" referred to here is for less than 90 days. This storage still may need decontamination (see item 7) but should be dropped from the plan title.
3. The plan contains no site drawings or floor plans showing the main features of the facility; neither is a process schematic included that would show, at least in a general way, the equipment involved. There is no indication of tank size or the capacity of related equipment.
4. There is no specified year of closure.
5. There is no mention of scheduled inspection(s) by the certifying party during closure.
6. The certificate of closure goes to the EID Director, not the EPA Regional Administrator.
7. Many of the comments on decontamination of TA-3-102 apply here, as the same language is used. The discussion of decontamination of the treatment works is fine, as is that of the outdoor area adjacent to the building, it is the storage area decontamination discussion which is vague.
8. The closure schedule is marginally adequate as given, but could be improved by a flowchart or a table outlining steps to closure, their time requirements, and contingencies that may affect these actions and times.
9. The EID may have further comments when more detailed submittals are made.



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