



TA-50

TONEY ANAYA  
GOVERNOR

**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**  
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DENISE FORT, DIRECTOR

September 7, 1984

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

Revisions made at the Sept. 11 and Sept 26 meetings are in **bold**.

**(LANL's closure plan will be submitted Dec. 1, 1984)**

1. The plan is marked "ROUGH DRAFT," and so does not bind LANL to any closure activities. This is not acceptable. **LANL agreed to remedy this by submitting an "interim" closure plan that would apply only until LANL's Part B is approved. This "interim" plan will commit LANL to actions at closure.**
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. **LANL told EID on Sept. 11 that it does store for greater than 90 days at TA-50-1; the EID has granted interim status to this storage. LANL will be in violation of permitting standards until a corrected Part A is filed. LANL agreed to send this Part A on Nov. 1.**
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. **LANL will supply this information, within the limitations of security considerations.**
4. There is no specified year of closure. **2100 is that year.**
5. There is no mention of scheduled inspection(s) by the certifying party during closure. **Though there is no formal mention of inspections in the HWMR-2, such inspections are implicit in the certification requirements.**
6. The certificate of closure goes to the EID Director, not the EPA Regional Administrator. **LANL will correct this. The "independent" licensed engineer referred to in the HWMR-2 means a licensed consulting engineer who is not a salaried employee of LANL or DOE.**
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. **LANL will correct this.**



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Comments on TA-50-1 Closure, Continued

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. **LANL may or may not improve this schedule.**
9. The EID may have further comments when more detailed submittals are made.