



Department of Energy

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

MAY 14 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Building A
P. O. Box 26110
Santa Fe, NM 87505

Dear Mr. Garcia:

Subject: Los Alamos National Laboratory (LANL) Response to NMED Letter, Dated April 14, 1997, Requesting Revisions to the Resource Conservation and Recovery Act (RCRA) Permit Modification Request Revision for the Radioactive Materials Research, Operations, and Demonstration (RAMROD) Facility, Mixed Waste Container Storage Areas, LANL Hazardous Waste Facility Permit No. NM0890010515-1

The purpose of this letter is to provide proposed revision text to supplement the RAMROD facility permit modification request submitted to the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) on December 9, 1996. The submittal of this revised text responds to the HRMB request of April 14, 1997 received by the U. S. Department of Energy (DOE) on April 17, 1997. The revised text adds existing equipment used as part of the Controlled Air Incinerator (CAI) to the RAMROD facility waste characterization and container storage activities.

The proposed revisions will modify the LANL RCRA Hazardous Waste Facility Permit issued to DOE and the University of California by the New Mexico Environmental Improvement Division (now NMED) on November 8, 1989. LANL's Hazardous Waste Facility Permit and United States Environmental Protection Agency identification numbers are NM0890010515-1 and NM0890010515 respectively.

The affected equipment at the Technical Area 50, Building 37 (TA-50-37) CAI Facility includes the stack, high efficiency particulate air (HEPA) filtration bank, plenum, and associated ducts and fans previously used as exhaust components for the incinerator. Amending the RAMROD permit modification request to include this equipment will allow LANL to review the equipment for reuse at this facility or for other future LANL projects. The ability to reuse the equipment, if appropriate, will retain the greatest flexibility for future use of this site for various scientific endeavors in addition to the RAMROD waste characterization activities. If the equipment is removed from TA-50-37



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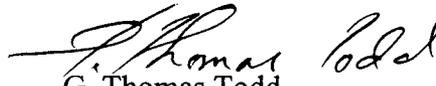
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prior to the final closure of the container storage areas, the equipment will be dismantled and decontaminated pursuant to the New Mexico Administrative Code, Title 20, Chapter 4, Part I (20 NMAC 4.1), Subpart V, §264.112(e), as revised March 1, 1997, and the RAMROD closure plan as amended by these revisions.

The submittal consists of this transmittal letter, an enclosed presentation of the revised text, and enclosed replacement pages for the original RAMROD facility permit modification package. An electronic copy of the suggested revision text is also provided. The replacement pages are submitted both in "redline" format for illustration and in "clean text" format to allow direct insertion into the permit modification package. Because of the length of the proposed inserted text, the replacements include supplementary pages to avoid repaginating entire sections of the permit modification request.

If you should have any questions or comments concerning this revision, please contact Jody Plum of my staff at (505) 665-5042.

Sincerely,


G. Thomas Todd
Area Manager

LAAMEP:3JP-042

Enclosures

cc w/enclosures:

Stuart Dinwiddie, Permit Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

Attachment 1**Suggested text additions to add CAI exhaust components to the RAMROD Facility
Permit Modification Request**

A. Proposed revisions to "Permit Modification Request, Radioactive Materials Research, Operations, and Demonstration Facility, Mixed Waste Container Storage Areas", Revision 0.0, December 1996:

1. Add an amended process description to present the rationale for transferring the exhaust component equipment to the RAMROD Facility waste management activities. The following text would be added to Section 4.0., "Design, Operations, and Process Information," after the first paragraph of Subsection 4.1.1, "TA-50-37 Room 112 Mixed Waste CSA," on page 4-3.

"In addition, ancillary equipment for the room or waste characterization gloveboxes may include exhaust components used for the Controlled Air Incinerator previously located in this room. The utility of re-using some or all of this equipment for glovebox, area, or other process ventilation will be considered for the RAMROD Facility and other future LANL projects. The ability to re-use this equipment will retain the greatest flexibility for future use of this site for various scientific endeavors in addition to the RAMROD waste characterization activities. This equipment includes the existing stack, plenum and associated ducts and fans. Eventual decontamination and removal of this equipment is discussed further in Section 9.1.4, "Closure Procedures and Decontamination."

2. Add a specific discussion of the transferred equipment and decontamination procedure to the RAMROD Facility closure plan. This discussion includes a reference to the citation at 20 NMAC 4.1, Subpart V, which would allow the removal of this equipment prior to final closure of the TA-50-37 container storage areas, as necessary, and a reference to the specific decontamination criteria to be applied to this equipment as presented in LANL's Proposed Alternative Demonstration of Decontamination, submitted to the Hazardous and Radioactive Bureau, New Mexico Environment Department, by the Department of Energy on December 3, 1996. This should be added to Section 9, "Closure Plan," at the end of Subsection 9.1.4, "Closure Procedures and Decontamination," page 9-4.

"As discussed in Section 4.1.1, exhaust components from the Controlled Air Incinerator will be considered for use in connection with the RAMROD waste characterization glovebox or facility ventilation units. If not suitable for use in the RAMROD facility, they may also be considered for use in other LANL projects or be appropriately disposed of. This equipment consists of the existing stack, plenum and associated ducts and fans. If this equipment is removed from the RAMROD facility prior to final closure of the CSAs addressed in this closure plan, the equipment will be dismantled and decontaminated pursuant to 20 NMAC 4.1, Subpart V, Part 264, Subpart G, 264.112(e), revised March 1, 1997. Successful decontamination for each equipment component will be defined as detectable hazardous constituents in the final rinsate sample equal to or less than the risk-based concentrations presented in the latest version of the U.S. Environmental Protection Agency (EPA) Region III Risk-Based Concentration Table or other concentration levels agreed upon with the New Mexico Environment Department (NMED). Documentation of the decontamination procedure, verification results, and ultimate location for disposition of this equipment will be maintained in the facility operating record."

3. Add a reference to the approved CAI closure plan, as incorporating the original exhaust equipment at Section 13, "References".

"New Mexico Environment Department (NMED) June, 1996, "Amended Closure Plan, Permit Attachment E.4, Dismantlement Revision, NM-089-0010515-1," Santa Fe, New Mexico.

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B. Proposed revision to "Proposed Hazardous Waste Facility Permit Modification, Radioactive Materials Research, Operations, and Demonstration Facility, Mixed Waste Container Storage Areas," December 1996.

1. Add the following text to Section E.10 "Technical Area 50, Building 37, Rooms 112, 114, 115, 117, and 118 Mixed Waste Container Storage Areas, Subsection E-10.3.2 "Unit Closure," page 2, at the end of first paragraph. The proposed text would incorporate the changes discussed above into the original hazardous waste facility permit.

"The existing exhaust stack, plenum, and associated ducts and fans used as part of the Controlled Air Incinerator may be decontaminated and removed prior to the final closure of the CSAs addressed by this closure plan. Decontamination of this equipment will be initiated pursuant to 20 NMAC 4.1, Subpart V, Part 264, Subpart G, 264.112(e), revised March 1, 1997, and will be defined as detectable hazardous constituents in the final rinsate sample equal to or less than the risk-based concentrations presented in the latest version of the U.S. Environmental Protection Agency (EPA) Region III Risk-Based Concentration Table or other concentration levels agreed upon with the New Mexico Environment Department (NMED). Documentation of the decontamination procedure, verification results, and ultimate location for disposition of this equipment will be maintained in the facility operating record."

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Attachment 2

**Proposed Change-Out Pages to the RAMROD Facility Permit Modification Request
"Redline" and "Clean-Text" Formats**

of Room 112. Pumps are located within the two largest pits in the room. Fire-suppression liquids would collect in the trenches, drains, and pits.

In addition, ancillary equipment for the room or waste characterization gloveboxes may include exhaust components used for the Controlled Air Incinerator previously located in this room. The utility of re-using some or all of this equipment for glovebox, area, or other process ventilation will be considered for the RAMROD Facility and other future LANL projects. The ability to re-use this equipment will allow the greatest flexibility for future use of this site for various scientific endeavors in addition to the RAMROD Facility waste characterization activities. This equipment includes the existing stack, plenum, and associated ducts and fans. Eventual decontamination and removal of this equipment is discussed further in Section 9.1.4, "Closure Procedures and Decontamination."

The storage capacity for the Room 112 CSA is 2,330 gallons, or approximately 42 55-gallon drums. Wastes to be stored in the Room 112 CSA include TRU mixed wastes that consist of solid physical forms and wastes that are either suspected or known to contain free liquids. Further information on the wastes that may be stored in the Room 112 CSA is provided in Table 3-1 of this permit modification request.

Waste containers to be stored in the Room 112 CSA will primarily include drums of various sizes. Standard waste boxes (SWB), fiberglass-reinforced plywood (FRP) boxes, steel B25 boxes, and various other containers may also be stored. Detailed information regarding different container types used at LANL is provided in Section 4.2.1. To facilitate container movement, storage, and inspection, all drums holding wastes that do not contain free liquids (see below) will be stored on elevation devices. Containers holding suspect or known liquids will be stored on self-containment pallets or devices. FRP boxes, SWBs, and steel B25 boxes are elevated by design. Elevated containers and self-containment pallets or devices provide protection from potential contact with liquids that could be introduced through fire-suppression activities. Together, these waste management practices and design features satisfy the requirements of 20 NMAC 4.1, Subpart IX, 270.15(b)(2), and 20 NMAC 4.1, Subpart V, 264.175(c), revised November 1, 1995.

Pursuant to the requirements of 20 NMAC 4.1, Subpart IX, 270.15(b)(1), revised November 1, 1995, information contained in LANL's waste databases will be used initially to verify the absence of free liquids in containers. In addition, some containers received at the Room 112 CSA will have been characterized with real-time radiography (RTR) to verify the presence or absence of free liquids within the container.

Containers suspected or known to contain free liquids will be stored on self-containment pallets or devices. The self-containment pallets or devices will be constructed of impervious, corrosion-resistant materials compatible with the wastes and will have the capacity to contain at least 10 percent of the total volume of the potential liquid-bearing containers or the volume of the largest potential liquid-bearing container, whichever is greater. Containers will be placed on

used to collect and provide containment for the used wash water, as necessary. The used wash water will be collected, sampled, and analyzed for the parameters in Table 9-2, as appropriate. If the used wash water is nonhazardous and nonradioactive, it will be managed appropriately in accordance with LANL policy. Otherwise, the used wash water will be managed at an appropriate on-site facility, depending on the regulated constituents present. If sampling and analysis indicate that hazardous and/or radioactive constituents are present, the wash cycles and analyses will continue until the area has been decontaminated or the decision is made to segregate contaminated portions of the storage area for subsequent management as contaminated waste. Decontamination verification is discussed further in Section 9.1.6.

After the walls and floors of a CSA have been decontaminated, recessed areas (e.g., sumps, pits, trenches, recessed floor) of the CSA (if present) will be wiped down with wash water. The used wash water will collect in the recessed areas, where it will be sampled and analyzed for the parameters in Table 9-2, as appropriate. After sampling, the used wash water will be removed from the recessed area, transferred to appropriate containers, and stored pending analysis. The wash cycles and analyses will continue until the recessed areas have been decontaminated or the decision is made to segregate contaminated portions of the recessed areas for subsequent management as contaminated waste. Used wash water will be managed in the same manner as wall and floor used wash water.

Under normal circumstances, the following soil sampling activities will not be applicable because the CSAs are located inside a building with an impervious floor. However, if soil sampling is deemed necessary based on analytical evidence and the operational history of the unit, sampling of the area will be performed to verify that no hazardous constituents remain upon closure as a result of container storage activities. A grid will be sited over the area to be sampled, boreholes drilled through the floor material, and soil samples taken and analyzed to determine horizontal and vertical extent of contamination.

As discussed in Section 4.1.1, exhaust components from the Controlled Air Incinerator will be considered for use in connection with the RAMROD Facility waste characterization glovebox or facility ventilation units. If not suitable for use in the RAMROD Facility, they may also be considered for use in other LANL projects or be disposed of appropriately. This equipment consists of the existing stack, plenum, and associated ducts and fans. If this equipment is

removed from the RAMROD Facility prior to final closure of the CSAs addressed in this closure plan, the equipment will be dismantled and decontaminated pursuant to 20 NMAC 4.1, Subpart V, Part 264, Subpart G, 264.112(e), revised March 1, 1997. Successful decontamination for each equipment component will be defined as detectable hazardous constituents in the final rinsate sample equal to or less than the risk-based concentrations presented in the latest version of the U.S. Environmental Protection Agency (EPA) Region III Risk-Based Concentration Table or other concentration levels agreed upon with the New Mexico Environment Department (NMED). Documentation of the decontamination procedure, verification results, and ultimate location for disposition of this equipment will be maintained in the facility operating record.

9.1.5 Decontamination Equipment

Prior to use, decontamination equipment will be rinsed with distilled water. Decontamination equipment rinsate blanks will be collected and analyzed in accordance with QA/QC procedures (see Section 9.1.8 of the LANL General Part B). Reusable protective clothing, tools, and equipment used during closure activities will be cleaned with wash water and scraped as

13.0 LIST OF REFERENCES

AEHA, see U.S. Army Environmental Hygiene Agency.

American Society for Testing and Materials (ASTM), 1991, "Standard Practice for Sampling Waste and Soils for Volatile Organic Compounds," *ASTM D4547-91*, Annual Book of ASTM Standards, Philadelphia, Pennsylvania.

American Society for Testing and Materials (ASTM), 1983, "Standard Practice for Thin-Walled Tube Sampling of Soils," *ASTM D1587-83*, Annual Book of ASTM Standards, Philadelphia, Pennsylvania.

Daniel B. Stephens & Associates, Inc., 1995, "Laboratory Analysis of Soil Hydraulic Properties of LANL Mixed Waste Disposal Project Soil Samples," Daniel B. Stephens & Associates, Inc., Albuquerque, New Mexico.

DBA, see Daniel B. Stephens & Associates, Inc.

DOE, see U.S. Department of Energy.

EG&G, 1994, "Idaho National Engineering Laboratory Simulated Solidified Transuranic Waste Sampling Program," *EGG-WM-11222*, Idaho Falls, Idaho, M. J. Connolly, EG&G-Idaho Inc., Idaho National Engineering Laboratory.

EPA, see U.S. Environmental Protection Agency.

LANL, see Los Alamos National Laboratory.

Los Alamos National Laboratory (LANL), 1997, "Proposed Hazardous Waste Facility Permit Modification, Radioactive Materials Research, Operations, and Demonstration Facility, Mixed Waste Container Storage Areas," Revision 1.0.

Los Alamos National Laboratory (LANL), 1996a, "General Part B Permit Application Information for Los Alamos National Laboratory," Los Alamos National Laboratory, Los Alamos, New Mexico.

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Document: LANL RAMROD Permit Mod
Revision No.: 1.0
Date: May 1997

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Purtymun and Johansen, 1974, "General Geohydrology of the Pajarito Plateau," New Mexico Geological Society Handbook, 25th Field Conference, Central Northern New Mexico.

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U.S. Department of Energy (DOE), 1994c, "TRU Waste Characterization Quality Assurance Program Plan," CAO-94-1010, Rev. B, Draft, Carlsbad Area Office, Carlsbad, New Mexico.

Document: LANL RAMROD Permit Mod
Revision No.: 1.0
Date: May 1997

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U.S. Department of Energy (DOE), 1989, "TRUPACT-II Content Codes (TRUCON)," DOE/WIPP 89-004, Rev. 3, U.S. Department of Energy, Washington, D.C.

U.S. Department of Energy (DOE), 1988, "Radioactive Waste Management," DOE Order 5820.2A, U.S. Department of Energy, Washington, D.C.

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Woodward-Clyde Federal Services, 1995, "Evaluation of the Potential for Surface Faulting at TA-63," prepared for Los Alamos National Laboratory, Los Alamos, New Mexico.

E.10.3 Closure Procedure and Decontamination

E.10.3.1 Partial Closure

Partial closure would consist of closing one or more of the hazardous and/or mixed waste management units or subunits at the LANL facility, while leaving the other hazardous and/or mixed waste management units at LANL in service. In the event of a partial closure, the following procedures would apply to the unit(s) being closed.

E.10.3.2 Unit Closure

To the extent possible, contaminated structures and equipment at the CSAs addressed in this closure plan will be decontaminated. Structures, equipment, and media that cannot be decontaminated will be containerized and managed in compliance with appropriate regulations. Sampling conducted during closure and decontamination activities will be done in accordance with quality assurance/quality control (QA/QC) procedures (see Section E.10.7).

The existing exhaust stack, plenum, and associated ducts and fans used as part of the Controlled Air Incinerator may be decontaminated and removed prior to the final closure of the CSAs addressed by this closure plan. Decontamination of this equipment will be initiated pursuant to 20 NMAC 4.1, Subpart V, Part 264, Subpart G, 264.112(e), revised March 1, 1997, and will be defined as detectable hazardous constituents in the final rinsate sample equal to or less than the risk-based concentrations presented in the latest version of the U.S. Environmental Protection Agency (EPA) Region III Risk-Based Concentration Table or other concentration levels agreed upon with the New Mexico Environment Department (NMED). Documentation of the decontamination procedure, verification results, and ultimate location for disposition of this equipment will be maintained in the facility operating record.

Before proceeding with any closure activities, the CSAs will be surveyed for radiological contamination. Personal protective equipment (PPE) and monitoring requirements will be determined by LANL's Health Physics Operations (ESH-1) and Industrial Hygiene and Safety (ESH-5) Groups following a field inspection. Radiation and chemical monitoring will occur throughout closure activities. If any contamination is found, the contaminated materials, equipment, and/or structures will be decontaminated (if possible) or containerized and taken to an approved storage location at LANL appropriate for the waste type.

Personnel involved in closure activities will wear appropriate PPE, specified by ESH-1 and ESH-5, and will follow good hygiene practices to protect employees from exposure to mixed waste. The level of PPE that will be required will depend upon the levels of radiological and/or chemical contamination that are detected, if any. If ESH-1 and ESH-5 surveys do not indicate detectable contamination levels, minimum PPE requirements will consist of coveralls, steel-toed boots, rubber gloves, and safety glasses or face shields. If an overhead danger is present, a hard hat will be worn. All workers involved in closure activities will be required to have training and medical monitoring. Contaminated PPE will either be decontaminated or managed in compliance with appropriate regulations.

Wastes will be removed from the CSA scheduled to be closed prior to the initiation of closure activities. Containers will be removed from each storage area primarily with forklifts or pallet handlers. Small containers may be handled manually or with dollies. Containers will be placed onto flatbed trucks or trailers for transport. Appropriate shipping papers will accompany the wastes during transport. Containers holding mixed wastes will be moved to an approved on-site facility or permitted off-site treatment and/or disposal facility.

Before decontamination activities begin, samples of the clean water and detergent (wash water) squeezed from mops and/or sponges prior to use will be collected for analysis of the parameters listed in Table E.10-1. The analytical results from these samples will be used to provide a baseline for decontamination verification.

12.0 CERTIFICATION

In accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Subpart IX, 270.11(d), revised November 1, 1995, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Thomas E. Baca
Division Director for Environmental Management
Division
Los Alamos National Laboratory
Operator

13 May 97

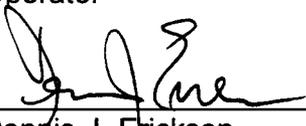
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Alexander J. Gancarz
Division Director for Chemical Science and
Technology Division
Los Alamos National Laboratory
Operator

13 MAY 97

Date Signed



Dennis J. Erickson
Division Director for Environment, Safety, and
Health Division
Los Alamos National Laboratory
Operator

5/13/97

Date Signed



G. Thomas Todd
Area Manager, Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

5.14.97

Date Signed

CERTIFICATION

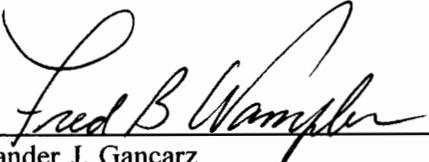
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Thomas E. Baca
Division Director for Environmental Management
Division
Los Alamos National Laboratory
Operator

13 May 97

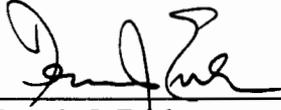
Date Signed



Alexander J. Gancarz
Division Director for Chemical Science and
Technology Division
Los Alamos National Laboratory
Operator

13 MAY 97

Date Signed



Dennis J. Erickson
Division Director for Environment, Safety, and
Health Division
Los Alamos National Laboratory
Operator

5/13/97

Date Signed



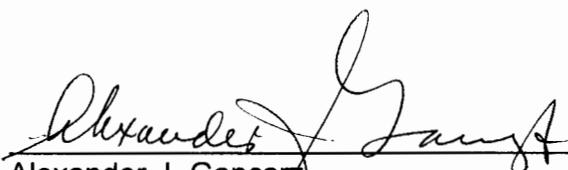
G. Thomas Todd
Area Manager, Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

5.14.97

Date Signed

12.0 CERTIFICATION

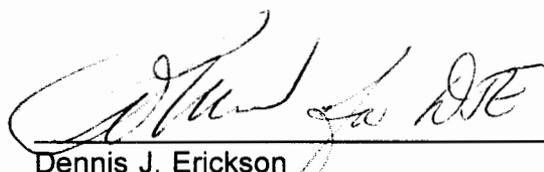
In accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Subpart IX, 270.11(d), revised November 1, 1995, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Alexander J. Gancarz
Division Director for Chemical Science and
Technology Division
Los Alamos National Laboratory
Operator

12-3-96

Date Signed



Dennis J. Erickson
Division Director for Environment, Safety, and
Health Division
Los Alamos National Laboratory
Operator

12/2/96

Date Signed



G. Thomas Todd
Area Manager, Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

12.5.96

Date Signed

13.0 LIST OF REFERENCES

AEHA, see U.S. Army Environmental Hygiene Agency.

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American Society for Testing and Materials (ASTM), 1983, "Standard Practice for Thin-Walled Tube Sampling of Soils," *ASTM D1587-83*, Annual Book of ASTM Standards, Philadelphia, Pennsylvania.

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E.10.3 Closure Procedure and Decontamination

E.10.3.1 Partial Closure

Partial closure would consist of closing one or more of the hazardous and/or mixed waste management units or subunits at the LANL facility, while leaving the other hazardous and/or mixed waste management units at LANL in service. In the event of a partial closure, the following procedures would apply to the unit(s) being closed.

E.10.3.2 Unit Closure

To the extent possible, contaminated structures and equipment at the CSAs addressed in this closure plan will be decontaminated. Structures, equipment, and media that cannot be decontaminated will be containerized and managed in compliance with appropriate regulations. Sampling conducted during closure and decontamination activities will be done in accordance with quality assurance/quality control (QA/QC) procedures (see Section E.10.7).

Before proceeding with any closure activities, the CSAs will be surveyed for radiological contamination. Personal protective equipment (PPE) and monitoring requirements will be determined by LANL's Health Physics Operations (ESH-1) and Industrial Hygiene and Safety (ESH-5) Groups following a field inspection. Radiation and chemical monitoring will occur throughout closure activities. If any contamination is found, the contaminated materials, equipment, and/or structures will be decontaminated (if possible) or containerized and taken to an approved storage location at LANL appropriate for the waste type.

Personnel involved in closure activities will wear appropriate PPE, specified by ESH-1 and ESH-5, and will follow good hygiene practices to protect employees from exposure to mixed waste. The level of PPE that will be required will depend upon the levels of radiological and/or chemical contamination that are detected, if any. If ESH-1 and ESH-5 surveys do not indicate detectable contamination levels, minimum PPE requirements will consist of coveralls, steel-toed boots, rubber gloves, and safety glasses or face shields. If an overhead danger is present, a hard hat will be worn. All workers involved in closure activities will be required to have training and medical monitoring. Contaminated PPE will either be decontaminated or managed in compliance with appropriate regulations.

Wastes will be removed from the CSA scheduled to be closed prior to the initiation of closure activities. Containers will be removed from each storage area primarily with forklifts or pallet handlers. Small containers may be handled manually or with dollies. Containers will be placed onto flatbed trucks or trailers for transport. Appropriate shipping papers will accompany the wastes during transport. Containers holding mixed wastes will be moved to an approved on-site facility or permitted off-site treatment and/or disposal facility.

Before decontamination activities begin, samples of the clean water and detergent (wash water) squeezed from mops and/or sponges prior to use will be collected for analysis of the parameters listed in Table E.10-1. The analytical results from these samples will be used to provide a baseline for decontamination verification.