

TA 50



**Solid Waste Regulatory Compliance**  
P.O. Box 1663, Mail Stop K490  
Los Alamos, New Mexico 87545  
(505) 667-0666/Fax (505) 667-5224

Date: February 3, 2003  
Refer To: SWRC:03-005

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Steve Jetter  
Permits Management Program  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303



Dear Mr. Jetter:

**SUBJECT: Confirmation of Agreement on Closure Procedure for Technical Area 50, Building 37 (TA -50-37), Los Alamos National Laboratory (LANL)**

The purpose of this letter is to confirm our agreement on the terms for the Resource Conservation and Recovery Act (RCRA) closure of TA-50-37. These were discussed during a meeting and tour between you and three members of LANL's Solid Waste Regulatory Compliance Group (RRES-SWRC), Loren Abercrombie, Jack Ellvinger, and Jeff Carmichael, on January 21, 2003.

A closure plan (*Los Alamos National Laboratory Technical Area 50 Closure Plan for Container Storage Units, TA-50-1, Room 59, TA-50-37, and TA-50-114, LA-UR-02-4729*), was submitted July 2002 for the Container Storage Unit (CSU) in TA-50-37. This closure plan consists of Rooms 115, 117, and 118; as well as an associated exhaust stack, ducts, plenum, fans, and a high efficiency particulate air (HEPA) filter bank. Approval for storage of hazardous waste in the room housing the HEPA filter bank (Room 112) was requested originally, however this location was never permitted. LANL requests that this room be removed from consideration for inclusion in the RCRA Hazardous Waste Facility Permit.

During the walk-through of TA-50-37, sampling locations and number of samples were agreed upon in Rooms 115, 117, and 118, in addition to the exhaust system located at TA-50-37. Enclosed is a description of the sampling locations and number of samples that will be taken at TA-50-37. Twenty-two samples will be taken in Room 117 and seventeen samples will be taken in Room 118. Five locations have been identified for possible samples within the exhaust system. All of these locations will be sampled, provided the locations can be reached with sampling equipment.

Samples from within Rooms 117 and 118 will be analyzed for RCRA metals, with the exception of the sums. These will be analyzed for the full suite of required analysis. All samples taken from the exhaust system will be analyzed for the constituents located in Table 3 of the closure plan referenced above. These constituents were chosen due to the units past management history and association with the Controlled Air Incinerator (CAI). The CAI was certified as closed in 1998; however, the exhaust



**ENCLOSURE**

**TA-50-37  
CONTAINER STORAGE UNIT (CSU) AND EXHAUST SYSTEM  
SAMPLING LOCATIONS**

**Decontamination Sampling of  
Resource Conservation and Recovery Act (RCRA)  
Permitted and Interim Status Container Storage Unit (CSU)**

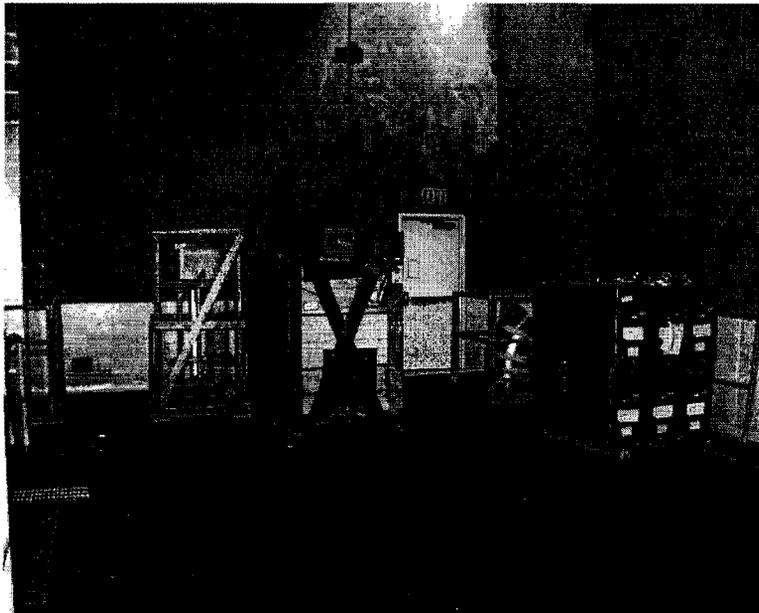
Room 117:

Room 117 is located on the Southeast corner of building TA-50-37. This room was designed and constructed to store liquid wastes. The room has a grated floor and two separate sumps. A common wall divides the sumps. As agreed, the decontamination will consist of the floor below the grate up to the grated floor level.

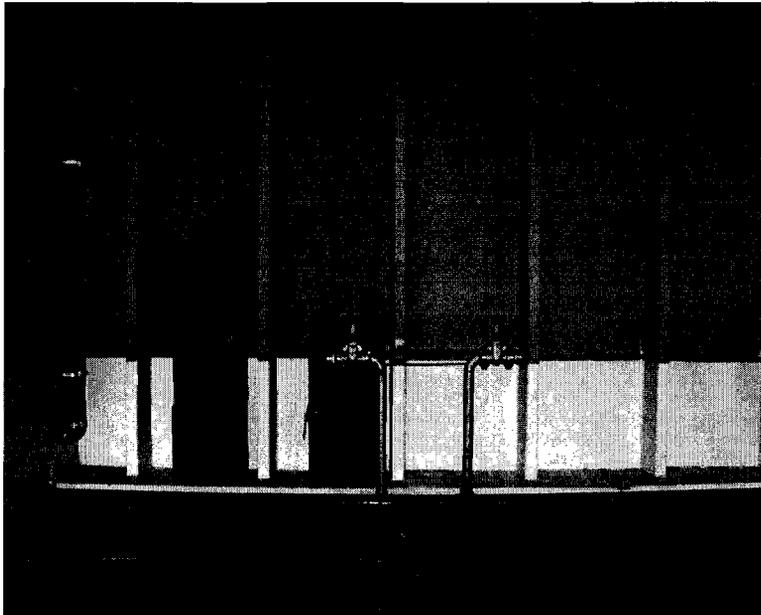
Each collection sump area will be sampled as follows:

- 1) The floor will be divided into six sections and each floor section will require a sample,
- 2) the common wall dividing the sump areas will have two samples on each side of the wall,
- 3) the east and west wall will have two samples collected from each wall,
- 4) the north and south wall in each sump area will have one sample collected from each wall, and
- 5) the collection sump pump area in each section will be sampled.

There will be a total of twenty-two (22) samples collected in room 117 to verify the room is clean and no hazardous constituents are present.



Room 117 Southeast View



Room 117 West View

**Note:** Access to the area below the grating is listed as a confined space. A confined space permit will be required prior to accessing the area below the grating.

Room 118:

Room 118 is located on the Northeast corner of TA-50-37. The room has a concrete floor with a collection sump located in the center of the room. As agreed, this room will be divided into equal quadrants. The room will require the following sampling:

- 1) the floor is divided into four quadrants by the means of expansion joints, two samples will be collected from each floor quadrant (total of eight samples for the floor),
- 2) each painted area of the wall will require two samples for a total of 8 wall samples, and
- 3) the collection sump will have one sample collected.

The total of seventeen (17) samples will be collected to verify that no hazardous constituents are present.

Decon and sample the painted area only



Sump plate cover will be removed and 1 sample collected at the bottom of the sump

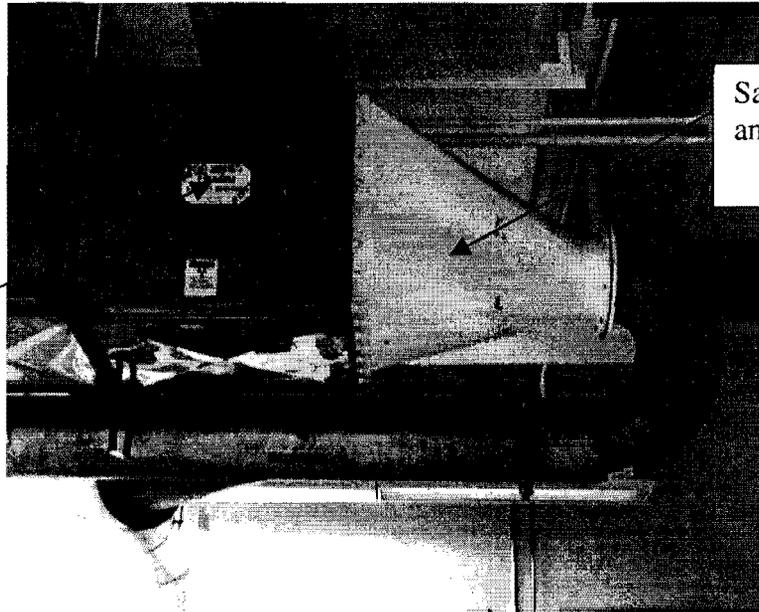
Room 118 East View

Room 115:

Room 115 was decontaminated during the closure of the Controlled Air Incinerator (CAI) in 1996-1997. Being that no waste has been placed in storage since the room was decontaminated, it was agreed that this room could be closed using the data in the CAI closure documentation.

## Exhaust System Including Stack

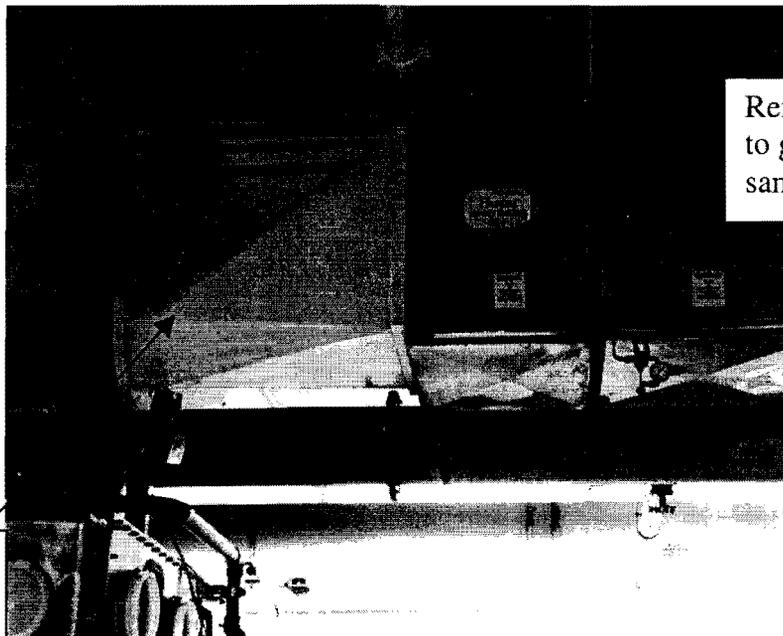
Five location points were identified as possible sampling locations. The location points are as follows:



Sample transition  
and elbow

Remove HEPA filter  
to gain access to  
sampling location

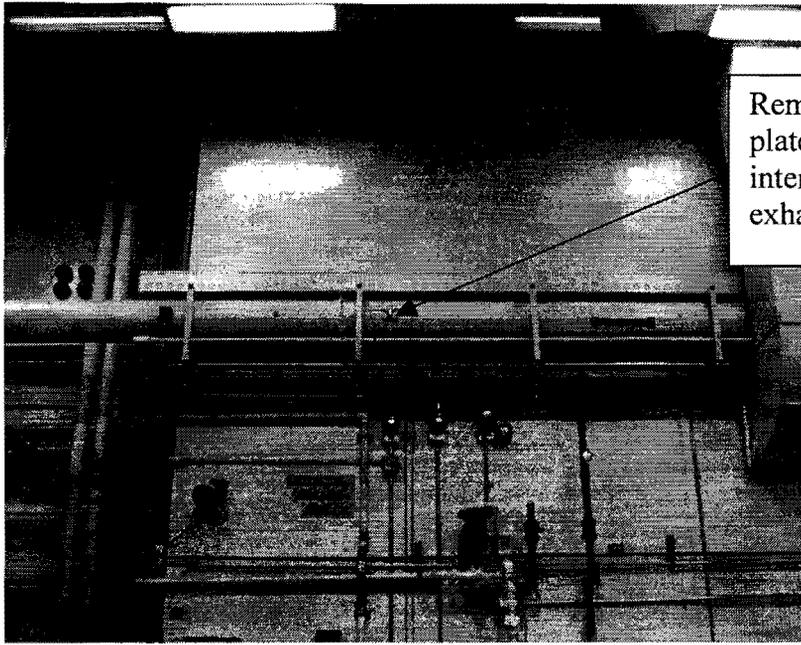
High Efficiency Particulate Air (HEPA) Filter bank  
Sample Location #1



Remove HEPA filter  
to gain access to  
sampling location

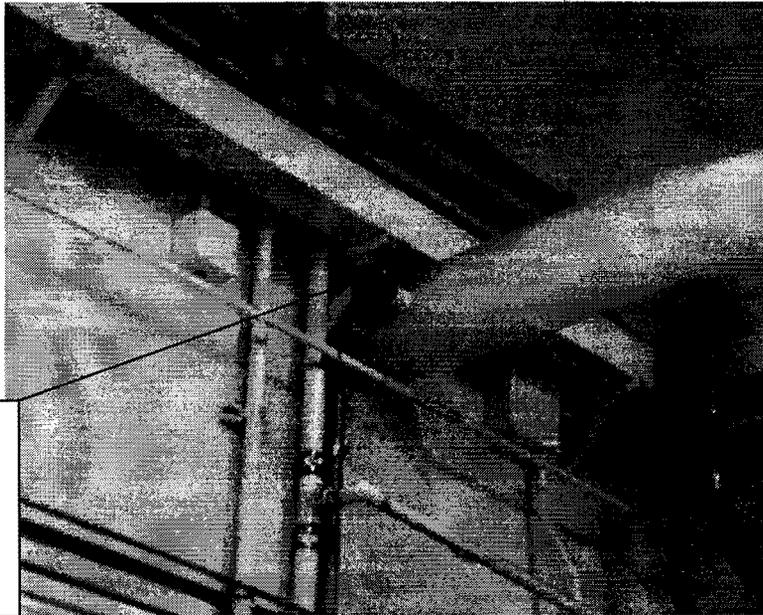
Sample Transition  
and straight section  
of exhaust system

HEPA Filter Bank  
Sample Location #2



Remove cover plate and sample interior section of exhaust duct.

Exhaust Duct  
Sample Location #3



Remove valve and sample in and around opening of pipe nipple.

Exhaust Duct  
Sample Location #4



Access to Sample Location #5 is through the access door. Sample location will be the transition and exhaust duct.

Exhaust system ductwork enters transition piece at this location

Bag House and HEPA Filter  
Sample Location #5

**Note:** All sampling locations require accessing the internal surfaces of the ductwork. Prior to any sampling Radiological Work Permit (RWP) will be required. Access to the bag house will require a confined space permit.