



**Department of Energy**  
National Nuclear Security Administration  
Los Alamos Site Office  
Los Alamos, New Mexico 87544

JUN 17 2003



Mr. Carl Will, RCRA Permits Management Program  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

Dear Mr. Will:

Subject: Withdrawal of "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"

The intent of this letter is to request that the above referenced document (LA-UR-02-4729) be withdrawn from review and to relay a course of action for the TA-50 Container Storage Unit (CSU) closures. This request originates from discussions between you and Jack Ellvinger of the Solid Waste Regulatory Compliance Group (RRES-SWRC).

It is our understanding that the general closure plan for the CSUs should be divided into separate plans according to the regulatory designation (permitted vs. interim status) of the units. The following paragraphs detail how this will be conducted.

An updated closure plan will be submitted for TA-50-114 to revise the approved closure plan located in Attachment E.3 of the DOE/UC Hazardous Waste Facility Permit. Closure procedures as well as sampling and analysis procedures have changed since the drafting of Attachment E.3 and a revision is necessary to incorporate them. The DOE/UC Hazardous Waste Facility Permit also contains an approved closure plan for TA-50-37, Room 117 in Attachment E.5. A revised closure plan will be submitted for this CSU as well, per similar reasoning. We request these to be Class 1 permit modifications pending New Mexico Environment Department (NMED) approval according to 20.4.1 NMAC incorporating 40 CFR 270.42. This section states that changes to the procedures for decontamination of facility equipment, with prior approval from NMED, are Class 1 permit modifications.

A closure plan for interim status CSUs TA-50-1, Room 59; TA-50-37, Room 115; and TA-50-37, Room 118 will be submitted. Closure plans for these units were prepared in 1992 and these plans will be revised and combined into one plan. Due to the similarities in the closure procedures and sampling and analysis procedures for these units, this course of action will be more efficient. This plan will also contain upgrades in closure procedures.

An exhaust stack, ducts, plenum, fans, and a high efficiency particulate air (HEPA) filter bank are also located in TA-50-37. Approval for storage of hazardous waste in the room housing the HEPA filter bank (Room 112) was requested in the TA-50 Part B Permit Application Revision 1.0 submitted in January 1999 as well as Revision 2.0 submitted



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February 2001. The application has not been approved. We request that this room be removed from consideration for inclusion in the DOE/UC Hazardous Waste Facility Permit. The exhaust system was formerly associated with the Controlled Air Incinerator (CAI) that was located at TA-50-37. The CAI was certified as closed in 1998; however, the exhaust system was left in place for use by other projects. This equipment will be closed by implementing a revised version of the CAI Amended Closure Plan that was submitted to the NMED in September 1997 as Appendix A of the CAI RCRA Closure Report and Certification and as allowed by 20.4.1 NMAC incorporating 40 CFR 264.112(e). Section E.4.3.2 of the CAI Amended Closure Plan allows for reuse of the various components/equipment associated with the CAI if no contamination is found or if they are successfully decontaminated. A letter detailing procedures and sampling locations as well as changes required to the CAI closure plan will be submitted with the three (3) closure plans described above.

If you have any questions or concerns regarding this submittal, please contact either Gene Turner, DOE, at (505) 667-5794 or Jack Ellvinger, UC, at (505) 667-0633.

Sincerely,



Joseph C. Vozella  
Assistant Manager  
Office of Facility Operations

OFO:8GT-002

cc:

James P. Bearzi, Bureau Chief  
Hazardous & Radioactive Materials Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

John E. Kieling, Manager  
RCRA Permits Management Program  
Hazardous & Radioactive Materials Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

Steve Jetter  
RCRA Permits Management Program  
Hazardous & Radioactive Materials Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

G. Turner, OFO, LASO  
J. Stetson, PWT, LASO  
E. Louderbough, LC-ESH, LANL, MS-A187  
D. McLain, FWO-WFM, LANL, MS-J593  
B. Ramsey, RRES-DO, LANL, MS-J591  
A. Stanford, FWO-DO, LANL, MS-K492  
R. Alexander, FWO-WFM, LANL, MS-E518  
S. French, FWO- WFM, LANL, MS-J595  
B. Lechel, FWO-WFM, LANL, MS-J593  
D. Stavert, RRES-EP, LANL, MS-J591  
J. Ellvinger, RRES-SWRC, LANL, MS-K490  
L. Vigil-Holterman, RRES-SWRC, LANL, MS-K490