

TA-50



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 16, 2004

G. Pete Nanos, Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, NM 87545

Edwin Wilmot, Manager
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

**RE: APPROVAL WITH MODIFICATION OF CLOSURE PLANS FOR INTERIM
STATUS CONTAINER STORAGE UNITS:
TECHNICAL AREA 50, BUILDING TA-50-1, ROOM 59 AND BUILDING TA-50-
37, [ROOMS 115 AND 118], AND TECHNICAL AREA 55, ROOM B38
LOS ALAMOS NATIONAL LABORATORY NM0890010515
HWB-LANL-02-014, 02-025**

Dear Messrs. Nanos and Wilmot:

The New Mexico Environment Department (NMED) received comments during the public comment period for *Los Alamos National Laboratory Technical Area 50 Closure Plan for Interim Status Container Storage Units TA-50-1, Room 59 and TA-50-37 [Rooms 115 and 118]*, July 2003 (LA-UR-03-5409) and *Los Alamos National Laboratory Technical Area 55 Closure Plan for the B38 Container Storage Unit*, August 2002 (LA-UR-02-5451). NMED has reviewed these comments and requires modifications to the Closure Plans in response to the comments. NMED hereby approves these documents with the modifications described in the attachment to this letter.

The University of California and the Department of Energy (collectively, the "Permittees") must modify the Closure Plans as described in the attachment within thirty (30) days of receipt of this letter. If the Permittees fail to modify these documents and provide the revised documents within the given timeframe, the approval for these documents will be rescinded.

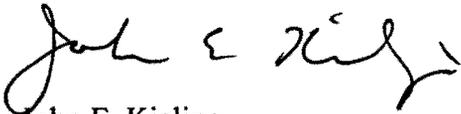


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Messrs. Nanos and Wilmot
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Should you have any questions, please feel free to contact Lee Winn of my staff at (505) 428-2541.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK: lw

cc: J. Bearzi, NMED HWB
D. Cobrain, NMED HWB
L. King, EPA Region 6 (6PD-N)
J. Ellvinger, LANL RRES-SWRC, MS K490
G. Bacigalupa, LANL RRES-SWRC, MS K490
G. Turner, DOE LASO, MS A316

File: Reading and LANL 2004 TA's 50 and 55

Attachment

Table A -Required Modifications to the Los Alamos National Laboratory (LANL) Technical Areas 55 and 50 Container Storage Unit Closure Plans		
No.	Location	Closure Plan Modification
Closure Plan for Technical Area 55 B38 Container Storage Unit		
1	1.6 Closure Certification	LANL shall modify the closure plan to revise the sentence to “The certification will be signed by the appropriate DOE and LANL officials and by an independent, registered professional engineer and will be, in accordance with 20.4.1 NMAC, Subpart VI, 265.115 [6-14-00].”
2	8.0 Verification of Decontamination	LANL shall modify the closure plan to clarify the type of blank to be used; and how it will be prepared and handled as follows: “The sample wash water blank will be prepared by the analytical laboratory. It will consist of de-ionized water. The blank container will remain closed on site.”
3	10.3.2.3 Analysis Request Form	LANL shall modify the closure plan to include the following: “All samples for laboratory analysis will be submitted to an accredited off-site contract laboratory.”
4	11.3.1 Field Quality Control	LANL shall modify the closure plan to include the following to describe a more specific frequency for field QC samples: “The frequency of field blank QC sampling will be 1 per day or one per 20 samples, whichever is more frequent.”
5	11.3.2 Analytical Laboratory QC Samples	LANL shall modify the closure plan to describe laboratory QC samples to include the following: “At a minimum, the laboratory shall analyze laboratory blanks, Matrix Spike/Matrix Spike Duplicate, Blank Spike/Blank Spike Duplicate, and laboratory duplicates at a frequency of one in twenty for all batch runs requiring EPA test methods and at a frequency of one in ten for non-EPA test methods.”
Closure Plan for Interim Status Container Storage Units TA-50 Room 59 and TA-50-37 Rooms 115 and 118		
6	General	LANL shall modify the closure plan by changing the second citation from 20.4.1.500 NMAC § 264.112(e) [6-14-00] to 20.4.1.600 NMAC § 265.112(e) [6-14-00].
7	3.2.2 Structural Assessment	LANL shall modify the closure plan by changing the sentence to “The sample will be analyzed for the hazardous contaminants identified in Tables 2 or 3 of this closure plan.
8	4.1 Sampling Strategy/ Approach	LANL shall modify the closure plan by changing the sentence to “These results from these samples will be used to determine if the equipment used for closure contribute any contaminants to the samples.”

**Table A -Required Modifications to the Los Alamos National Laboratory (LANL)
Technical Areas 55 and 50 Container Storage Unit Closure Plans**

No.	Location	Closure Plan Modification
9	4.3 Sample Management Procedures	LANL shall modify the closure plan to include the following: "All samples for laboratory analysis will be submitted to an accredited off-site contract laboratory."
10	4.4.3.1 Field Quality Control	LANL shall modify the closure plan to include the following to describe a more specific frequency for field QC samples: "The frequency of field blank QC sampling will be 1 per day or one per 20 samples, whichever is more frequent."
11	4.4.3.2 Analytical Laboratory Quality Control Samples	LANL shall modify the closure plan to describe laboratory QC samples to include the following: "At a minimum, the laboratory shall analyze laboratory blanks, Matrix Spike/Matrix Spike Duplicate, Blank Spike/Blank Spike Duplicate, and laboratory duplicates at a frequency of one in twenty for all batch runs requiring EPA test methods and at a frequency of one in ten for non-EPA test methods."
12	4.4.4 Data Reduction, Verification, Validation, and Reporting	LANL shall remove section 4.4.4 Data Reduction, Verification, Validation and Reporting from the closure plan. LANL shall include the following language in section 4.4.5 Data Reporting Requirements : "Summary tables of contract laboratory analytical data and EPA Level II QA/QC results will be presented to NMED. The raw analytical data, including calibration curves, instrument calibration data, data calculation work sheets, and other laboratory support data for samples from this project shall be compiled and kept on file at LANL for reference. LANL will make the data available to NMED upon request."