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SECRETARY

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**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

April 3, 1992

Jerry L. Bellows  
Area Manager  
Department of Energy  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

**RE: Closure Plan Notice of Deficiency**

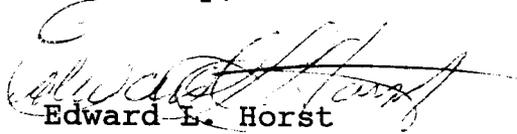
Dear Mr. Bellows:

The Hazardous and Radioactive Materials Bureau (HRMB) has completed a review of the TA-54, Area L, Waste Oil Storage Tank closure plan you sent to us on July 16, 1991. The Los Alamos National Laboratory (LANL) performed this closure prior to our approval of the plan.

We have completed a review of the document you submitted and our comments are enclosed for your consideration. Our major concern is that soil sampling was not included in the closure activities for the tanks that were closed. The HRMB is not able to grant clean closure of the tank storage units without applicable closure requirements being addressed. Please submit your response to the enclosed Notice of Deficiency within 30 days of receipt of this letter.

If you have any questions, please contact Marc Sides of my staff at (505) 827-4300.

Sincerely,

  
Edward L. Horst  
Program Manager

Enclosure

cc: William K. Honker, EPA Region 6, (6H-P)



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## NOTICE OF DEFICIENCY

### Closure Report Technical Area 54 Waste Oil Storage Tanks

#### Closure Plan Comments

1. **Section 5.1.4 Secondary Containment Decontamination Procedures; Page 7.** The closure plan states that the liner will be cleaned to meet the standards of HWMR-6, Part VI, Section 40 CFR 265.228(a)(1). This section of the regulations apply to surface impoundments that treat, store or dispose of hazardous waste according to Section 40 CFR 265.220. Closure of secondary containment systems for tanks is covered under Section 40 CFR 265.197. The closure plan must be revised to indicate the correct closure requirements if the rectangular tank secondary containment is not a surface impoundment. Provide an explanation of how the secondary containment system meets all applicable design and management requirements of Section 40 CFR 265.193. Include design and construction specifications.

If the unit constitutes a surface impoundment then a separate closure plan must be submitted which meets all requirements of Section 40 CFR 228.

2. **Section 5.1.5 Soil Sampling and Groundwater Investigation Plan; Page 7.** This section of the closure plan states that any visibly contaminated soil underlying and surrounding the decontamination area will be sampled in order to determine any remedial requirements for clean closure, and that the former location of the tanks (Area L) will be investigated during closure of that area.

The soil sampling plan is inadequate. Los Alamos must demonstrate through sample collection and analysis that all contaminated soils are removed and decontaminated in order to achieve clean closure. Los Alamos must develop an acceptable soil sampling and analysis plan. We suggest that Los Alamos formally request that this plan be incorporated into the closure plan for Area L. In this case, and if all other technical requirements for the TA 54 Waste Oil Storage Tank closure are met, NMED can approve the TA 54 Waste Oil Storage Tank closure plan. However, we will not be able to grant clean closure for the TA 54 Waste Oil Storage Tank closure until after clean closure for the units is demonstrated through Area L closure activities. Otherwise, the soil sampling and analysis strategy must be included in the TA 54

## Waste Oil Storage Tank closure plan.

Los Alamos should consider one of the above mentioned options or an equivalent option and submit the soil sampling and analysis plan specifically for contaminated soils associated with closure of the tanks.

3. **Contingent Closure and Post-Closure Plans.** If all tanks undergoing closure did not have secondary containment systems that meet the requirements of Section 40 CFR 265.193(b) through (f) then a contingent closure and post-closure plan for closing such tanks as landfills must be submitted. Provide the appropriate documentation of secondary containment or submit contingent closure and post-closure plans. Los Alamos may formally request that the contingent closure and post-closure plan (if applicable) be included with the closure plan for Area L. If contingent closure and post-closure plans apply to these units then they must be submitted either in the Area L closure plan or the TA 54 Waste Oil Storage Tank closure plan in response to this notice of deficiency.

*Will let soil investigations go into other TA 54 P.P.*

### Closure Certification Report Comments

4. The closure certification report is unclear. The report must be revised to include a narrative of how the tank decontamination sampling and analysis shows that the tanks were successfully decontaminated. Enclosure 2 Summary of Analysis needs to be explained. Specify which (if any) hazardous constituents were identified in what concentrations for the final rinsewater analysis from each tank. This information may be put in tabular form.
5. The certification located in Enclosure 5 needs to be signed by Mr. Bellows.
6. Provide a copy of all supporting documentation pertaining to this closure which is on file at Los Alamos as described in the front page of the closure report.