

ENTERED

TA 54

Kay, Rebecca, NMENV

From: Kay, Rebecca, NMENV
Sent: Tuesday, April 08, 2008 4:38 PM
To: 'Gian Bacigalupa'
Cc: Jack Ellvinger; 'Luciana Vigil-Holterman'; Cobrain, Dave, NMENV; Pullen, Steve, NMENV; Kieling, John, NMENV; Roberts, Kathryn, NMENV
Subject: Current Permit Closure Plan sampling grid

Gian-

Per our conference call this afternoon (Tuesday, April 8, 2008 at 1pm), the sampling grid that we were referring to is found in the current operating permit, Permit Attachment E.9 (*Closure for TA-54 Area L Solidified Hazardous Waste Storage Unit*) Section E.9.4, *Soil Decontamination*:

"A sampling survey of the entire contained solid waste storage area within the TA-54, Area L fence will be conducted using a grid with 10 foot centers to determine the area of possible contamination. The survey will be performed by collecting a sample from the surface to six inches below ground surface at each grid point. Additional samples will be collected from areas with visible contamination (i.e., soil discoloration). If the initial surface grid sample analysis indicates contamination, additional sampling at the same point at one foot depth will be performed to determine the depth of contamination. If contamination is determined on the surface, additional sampling will be conducted by reducing the grid distance by one-half and taking additional surface samples, dictated by terrain, until the contaminated area is defined. If contamination is found at the outside grid samples, the limits of the grid will be expanded to determine the outside perimeter of contamination, to include areas outside of the perimeter fence and at the discharge point run off ditch."

In regards to the concerns your group voiced in the conference call regarding the status of dome 215, according to the current operating permit, it is a structure associated with the permitted unit (see Figure E.9.9, *TA-54 Area L Waste Management Units*), which in the case of TA-54, Area L, is the area within the fence line (see the first sentence in Section E.9). The key in Figure E.9.1 clearly identifies dome 215 to be a "structure associated with the container storage unit", not a unit, permitted or otherwise (e.g., interim status). So NMED does not see how dome 215 could present a problem for the Permittees in a future closure of the unit (TA-54 Area L) under the current permit. More importantly, the sampling grid described in Section E.9.4 would cover the area where dome 215 sits.

NMED will wait to hear from you regarding specific issues the Permittees think the closure plans in the current permit present if implemented.

Thank you,
Rebecca Kay

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