

DRAFT CLOSURE PLAN
OPEN BURNING TREATMENT UNIT
TECHNICAL AREA 16-399 BURN TRAY

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DEFINITIONS

Terms used in this interim status Closure Plan shall (Closure Plant) have the same meanings as those in the HWA, RCRA, and their implementing regulations unless this Closure Plan specifically provides otherwise. Where a term is not defined in the HWA, RCRA, implementing regulations, or this Closure Plan, the meaning of the term shall be determined by a standard dictionary reference, EPA guidelines or publications, or the generally accepted scientific or industrial meaning of the term.

Active Portion means that portion of a facility where treatment, storage, or disposal operations are being or have been conducted after the effective date of 40 CFR Part 261 and which is not a closed portion as defined in 40 CFR § 260.10.

Consent Order means the March 1, 2005 Compliance Order on Consent issued to the Permittees pursuant to the HWA and the New Mexico Solid Waste Act requiring the Permittees to conduct Facility-wide investigations and cleanups of contaminants released to the environment.

Day means a calendar day unless otherwise specified. Business day means Monday through Friday, other than a federal or State legal holiday.

Department or NMED refers to the New Mexico Environment Department and any successor and predecessor agencies.

Discharge means the accidental or intentional spilling, leaking, pumping, pouring, emitting, emptying, or dumping of hazardous waste into or on any land or water.

Facility means the Los Alamos National Laboratory site comprised of approximately 40 square miles, located on the Pajarito Plateau in Los Alamos County in north central New Mexico, approximately 60 miles north-northeast of Albuquerque and 25 miles northwest of Santa Fe, and owned by the United States Department of Energy.

Hazardous Constituent or Hazardous Waste Constituent means: 1) any constituent identified in 40 CFR Part 261 Appendix VII that caused EPA to list a hazardous waste in 40 CFR Part 261 Subpart D; or 2) any constituent identified in 40 CFR Part 261, Appendix VIII. For purposes of closure, post-closure, or corrective action, “hazardous constituent” and “hazardous waste constituent” also means any constituent identified in 40 CFR Part 264 Appendix IX, perchlorate, and nitrates.

Hazardous Waste means a solid waste that is: 1) not excluded from regulation under 40 CFR § 261.4(b); and 2) is either listed in 40 CFR Part 261, Subpart D, exhibits any of the characteristics identified in 40 CFR Part 261, Subpart C, or is a mixture of solid waste and one or more hazardous wastes listed in 40 CFR Part 261, Subpart D.

For purposes of corrective action, “**hazardous waste**” shall have the meaning set forth in the HWA, Section 74-4-3(K).

Hazardous waste may be a “**mixed waste**,” which means it is waste that contains hazardous waste subject to the HWA and RCRA, and source, special nuclear, or byproduct material subject to the Atomic Energy Act, 42 USC § 2011, *et seq.* (AEA).

Hazardous Waste Management Unit means a contiguous area of land on or in which hazardous waste is placed, or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area. A container alone does not constitute a unit; the unit includes containers and the land or pad

upon which they are placed. At the Facility, hazardous waste management units include both permitted units and interim status units.

Interim Status Unit means any hazardous waste management unit that was in operation before the effective date of the statutory or regulatory amendments that caused the unit to become subject to permitting requirements, that meets the requirements for interim status under § 3005(e) of RCRA, 42 U.S.C. § 6925(e), for which interim status has not been terminated pursuant to section 3005(e)(2) of RCRA, 42 U.S.C. § 6925(e)(2), and that has not been issued a permit by EPA or the Department.

Permit means the Los Alamos National Laboratory Hazardous Waste Permit originally dated November 2010 including all attachments hereto and all modifications to the Permit.

Release means any accidental or intentional spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, or dumping of any hazardous waste or hazardous constituents inside a permitted unit or from a permitted unit to the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous waste or hazardous constituents.

1.0 INTRODUCTION

This Draft Closure Plan describes the activities necessary to close one of the interim status hazardous waste open burning treatment units at Technical Area (TA) 16 at the Los Alamos National Laboratory (LANL or the Permittees), hereinafter referred to as the “TA-16-399 Burn Tray” or “the Unit”. The information provided in this Closure Plan addresses the closure requirements specified in the Code of Federal Regulations (CFR), Title 40, Part 265, Subparts G and P for the thermal treatment units operated at the Facility under the Resource Conservation and Recovery Act (RCRA), the New Mexico Hazardous Waste Act and is consistent with the standards outlined in the Permit. Closure of the open burning treatment Unit must be completed in accordance with Section 4.1 of this Closure Plan.

The Unit will be closed by removal of the burn tray, decontamination of the cement pad and electrical box and collection and analysis of surface soil samples. Until closure is complete and has been certified in accordance with Permit Part 9.5 and 40 CFR §264.115, a copy of the approved Closure Plan, any approved revisions to the plan, and closure activity documentation associated with the closure must be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the Unit, this Closure Plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Any amended Closure Plans must be submitted to the New Mexico Environment Department (the Department or NMED) for approval prior to implementing closure activities.

2.0 DESCRIPTION OF UNIT TO BE CLOSED

TA-16 is located in the southwestern quadrant of the Facility at the west end of the Pajarito Plateau near the foothills of the Jemez Mountains (see Figure 1). Elevation ranges from approximately 7,700 feet at the west end of the TA to approximately 6,800 feet at the lower east end. Topography is varied, ranging from steep canyon walls to sloping mesa tops. The subject open burn (OB) units at LANL are located at the TA-16 Burn Ground and consist of the TA-16-388 Flash Pad and the TA-16-399 Burn Tray. The OB units are managed by the high explosives (HE) engineering personnel (Operators) who are responsible for the safe treatment, storage, and handling of HE waste and HE contaminated wastes generated by the HE production facilities at LANL.

2.1 Description of the Unit and the Wastes Treated at the Unit

The TA-16-399 Burn Tray (see Figure 2) is comprised of a four foot wide by 16 foot long steel tray supported by 1.5-foot-high legs and is lined with firebricks (see Figure 3). The maximum treatment capacity of the TA-16-399 Burn Tray is 1,000 pounds of waste per burn.

The Unit consists of: a burn tray, firebrick, burn tray cover, a concrete pad, an electrical box and is surrounded by a chain-link fence.

The burn tray, burn tray cover, and firebrick are the only items to be removed from the Unit. The concrete pad, electrical box, and fencing shall remain after the closure of the Unit. The remaining equipment must be assessed for damages, and decontaminated prior to closure of the Unit.

2.2 Descriptions of Wastes Treated at the Unit

The Permittees state that the TA-16-399 burn tray was used to treat a single waste stream by open burning to destroy the characteristic of reactivity (D003). Bulk explosives waste stream consist of: Octahydro-

1,3,5,7- tetranitro-1,3,5,7- tetrazocine (HMX); 2,4,6- trinitrotoluene (TNT); and triamino trinitrobenzene (TATB). Additionally, mixtures of explosives were treated including: ammonium nitrate-fuel oil (ANFO), Composition B, Cyclotol, IMX-101, PBX 9404, PBX 9407, PBX 9501, PBX 9502, PBX 9601, X0233, X0533, XTX 8003, XTX 8004, LX-02, LX-07, LX-10 and LX-14.

2.3 Treatment Method

The burn tray Operators packed waste explosives in cardboard and wooden boxes and transported the boxes to the Unit for treatment. The Operators rolled back the cover from the tray, and placed padding on the tray, while the technicians removed the explosives from the boxes and set them on the padding. The Operators then dampened the padding with kerosene. The Permittees report that approximately one-half gallon of kerosene was used during each treatment event. The Operators then connected electric matches (*e.g.*, squibs) to the firing cables and saturated the train of excelsior with kerosene, the Operators ran the train from the squibs to the padding for ignition. The Operators ignited all open burning treatment events remotely from a control building. The Operators allowed the waste to burn of its own accord, and observed the burn from the control building. After the burn was complete, the Operators waited for the tray to cool before putting the burn tray cover back in place. The Operators waited 24 hours after the treatment to remove any residue or ash from the burn tray. The Permittees report that treatment methods at this Unit were consistent during the operational period of 1980 to July 18, 2012; however, the treatment method used between the initial use of the Unit in 1951 and 1980 are not known.

3.0 ESTIMATE OF MAXIMUM WASTE TREATED

According to the Permittees record (1980-2012), the maximum treatment capacity of the TA-16-399 Burn Tray was 1,000 pounds of waste per burn and treatment events range in volume from 30 pounds to 350 pounds. The Permittees report that approximately 255,685 pounds of HE waste has been treated at the TA-16-399 Burn Tray since 1980. The Permittees report that TA-16-399 Burn Tray was operated as a treatment Unit from 1951 to 1980 (Vigil-Holterman, Luciana, 2010) but did not provide a record of waste treated during that time period.

4.0 GENERAL CLOSURE INFORMATION

4.1 Closure Performance Standard

The TA-16-399 Burn Tray must be closed to meet the following performance standards (40 CFR § 265.111) and in accordance to the requirements described in the Permit Section 9.4 .7 Closure Plans:

- a. minimize the need for further maintenance;
- b. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters, or to the atmosphere; and
- c. comply with the closure requirements of 40 CFR Part 265 Subparts G and P and with the risk-based cleanup levels included in Consent Order Section VIII, and the Permit Sections 11.4 and 11.5.

If residential cleanup levels are not achieved during closure, the Permittees shall submit an additional permit modification request to add a post-closure care plan to the facility Permit.

Closure of the Unit shall be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise removed and properly managed as waste; 2) closure has been completed in

accordance with this Closure Plan and been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) a closure report including closure certification as required by 40 CFR 265.115, has been submitted to, and approved by, the Department.

4.2 Closure Schedule

The following section provides the schedule of closure activities (also see Table 1 in this Closure Plan).

Closure activities must begin no later than 45 days after approval of this plan. However, pursuant to Permit Section 9.4.1, 9.4.2 and 40 CFR § 265.112(e), removing hazardous wastes, decontaminating or dismantling equipment, in accordance with an approved Closure Plan, may be conducted at any time before notification of closure. The records review has been completed, and the structural assessment was conducted on July 19, 2012. The review and assessment are described in Sections 5.1.1 and 5.1.2 of the Closure Plan. Upon approval of the Closure Plan, if applicable, the Unit surfaces and related equipment must be decontaminated or dispositioned as discussed in Section 5.2. All closure activities must be completed within 180 days after beginning closure. The final submittal of the closure certification report must be submitted to NMED 60 days after completing closure pursuant to Permit Section 9.5. In the event that closure of the Unit cannot proceed according to schedule, the NMED must be notified in accordance with the extension request requirements in 40 CFR § 265.113(b) and comply with the applicable closure requirements in 40 CFR § 265.113(b)(1) and (2).

4.3 Amendment of the Closure Plan

The Permittees may amend this Closure Plan in accordance with the requirements in 40 CFR § 265.112(c). If the results of the review or assessment require any changes to this Closure Plan (*e.g.*, the sampling and analysis plan), the Permittees shall submit an amended Closure Plan to NMED, for review and approval, in accordance with this Section (4.3).

5.0 CLOSURE PROCEDURES

Closure activities at the Unit shall include: a physical review of the Unit and a review of the Unit's records; proper management and disposal of hazardous waste residues, if applicable, and removal and cleaning of all contaminated surfaces and equipment associated with the Unit; sampling to verify the closure performance standards in Section 4.1 of this Closure Plan and Permit Sections 11.4 and 11.5 have been achieved; and submittal of a final closure certification report. The following sections describe these closure activities applicable to the Unit.

5.1 Records Review and Structural Assessment

Before starting closure decontamination and sampling activities, the Operating and Inspection Records for the Unit must be reviewed and a structural assessment must be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations. Specific results of the records review and structural assessment must be included within the closure certification report.

5.2 Records Review

The Facility Operating Record (including, but not limited to, inspection and contingency plan implementation records) has been reviewed pursuant to Permit Section 9.4.6.1. The goals of the review were to:

- a. confirm the specific hazardous waste constituents of concern listed in Table 2;

- b. update the above-mentioned list as necessary;
- c. update the estimated quantity of waste treated in Section 3.0 in the Closure Plan; and
- d. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

The Permittees have determined that there have been no spills or releases, defects, deterioration, damage, or hazards (*e.g.*, damage to the concrete pad or other Unit materials) affecting waste containment or treatment during the operational period of 1980 - 2012 of the Unit during which waste classified as hazardous waste was treated. Sections 3.0 and 6.1 and Table 2 of the Closure Plan have been updated to reflect changes made in support of the records review and structural assessment. The Permittees report that records are not available to review prior to 1980; therefore, release of contaminants may have occurred between 1951 and 1980.

5.3 Structural Assessment

The structural assessment is an assessment of the Unit's physical condition. The assessment for the Unit was conducted on July 19, 2012, in accordance to Permit Section 9.4.6.2. The assessment included inspecting the Unit's concrete pad (for any existing cracks or conditions that indicate a potential for release of hazardous constituents) and assessing the Unit for evidence of any releases. The assessment did not reveal any evidence of a release (*e.g.*, stains) or damage (*e.g.*, cracks, gaps, chips) to the pad. Given that the pad was not cracked or damaged, it will remain in place after closure is completed. This assessment must be photographed, documented and submitted to the NMED as part of the closure report.

5.4 Decontamination and Removal of Structures and Equipment

In accordance with 40 CFR § 265.112(b)(4), the Unit's related equipment and materials (*e.g.*, concrete pad), must be decontaminated, or removed and managed according to Section 7.0 of this Closure Plan and Permit Section 9.4.4. The decontaminated concrete pad will remain at the Unit. All surfaces and related equipment that are removed and not intended for recycle shall be considered solid and potentially hazardous waste when removed, and must be disposed of in accordance with Section 7.0 of the Closure Plan and Permit Section 9.4.3. Decontamination activities must ensure the removal of all hazardous waste residues and hazardous waste constituents from the Unit to meet the closure performance standards in Section 4.1 of this plan and Permit Section 9.4.4.

5.5 Removal of Structures and Related Equipment

The burn tray, metal cover, tracks and rims (without the rubber tires) must be flashed at the TA-16-388 Flash Pad. Prior to shipment off-site, a high explosives (HE) spot test must be completed for verification purposes in accordance with Permit Section 9.4.3. The electronic ignition assembly must be removed from the Unit at closure and recycled or disposed. The electrical box will remain in place. Permittees state that concrete pad shall remain in place (see Section 5.2 of this plan) and Permit Section 9.4.3. The bricks must be removed and must be disposed of or reused.

5.6 Decontamination of Structures and Related Equipment

The Unit's concrete pad must be decontaminated by hot water pressure washing or steam cleaning in accordance with Permit Section 9.4.3.1. An HE spot test must be conducted after the wash. Portable berms or other devices (*e.g.*, absorbent socks, plastic sheeting, and wading pools) must be used to collect excess wash water and provide containment during the decontamination process.

With the exception of the concrete block, electrical box and fence, no other equipment at the Unit will be left in place. The burn tray will be flashed at Unit 16-388 prior to shipment offsite for disposal or recycling.

5.7 Equipment Used During Decontamination Activities

Reusable protective clothing, tools, and equipment used during decontamination activities must be cleaned with a wash water solution that consists of a non-phosphate surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturers recommendations and in accordance with Permit Section 11.10.2.11 (Consent Order Section IX.B.3). Residue and disposable equipment must be containerized, characterized, and managed as waste in accordance with Section 7.0 of this Closure Plan and with Permit Section 9.4.5.

6.0 SAMPLING AND ANALYSIS PLAN

This Sampling and Analysis Plan (SAP) is designed to verify decontamination of surfaces, equipment, and materials; and determine whether a release of hazardous constituents to any environmental media has occurred. The SAP includes:

- a. A list of hazardous constituents of concern (*see* Table 2) for which soil must be analyzed. This list includes all hazardous constituents managed at this site, shall be defined as:
 - I. any constituent identified in 40 CFR Part 261, Appendix VIII; or
 - II. any constituent identified in 40 CFR Part 264 Appendix IX, dioxans, furans, perchlorates, diesel range organics (DRO) and nitrates.
- b. The list of hazardous constituents of concern shall be utilized to select the analytical methods capable of detecting those constituents.
- c. A site plan (Figure 4) depicting the boundaries of the Unit and verification and soil sampling locations. The locations include ten grab sample locations that represent locations immediately around the Unit and locations where run-off likely occurred from the Unit.
- d. The type of samples to be collected (*e.g.*, soil) and the rationale for the selection of the sample type.
- e. Sampling methods including a description of the approved EPA sampling methods and procedures that must be used to collect each type of sample as specified in *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW-846) (EPA, 1986).
- f. A description of the approved EPA SW-846 laboratory analytical methods that must be used to measure hazardous constituent concentrations (see Table 4).
- g. A description of quality assurance and quality control (QA/QC) procedures that include, but are not limited to:
 - I. field duplicates, trip blanks, equipment blanks;
 - II. a description of methods for decontamination of re-usable sampling equipment; and
 - III. a description of all sample preservation, handling, labeling, and chain-of-custody procedures.

6.1 Sampling Activities

Sampling activities must be conducted in order to demonstrate that Unit-related equipment and soils in and around the Unit meet the closure performance standards in Section 4.1. All samples shall be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this Closure Plan.

6.1.1 Sample Collection Procedures

Samples must be collected in accordance with the procedures identified in this SAP which incorporates guidance from the EPA (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures and shall comply with the Consent Order Section IX, and Section 9.4.7.1 and 11.10 of the Permit. Before samples are collected, the sampling plan must be approved by the area Explosives Safety Officer. The Explosives Safety Officer must evaluate the area to determine the potential for detonable explosives or explosives contamination, and whether or not any extracted samples may be released from the area without initial internal explosives analysis.

6.1.2 Soil Sampling

Soil samples must be collected from six locations outside the fence line of the TA-16-399 Burn Tray. Soil samples must be collected from four additional locations within the fence line (See Figure 4). A minimum of ten samples must be collected from the top two inches of soil and two samples must be collected from a 6 to 10 inch depth. The soil sample locations are in areas of potential deposition from air to soil and areas of disposition related to storm water runoff. Soil samples must be collected using a Teflon scoop for surface samples and a stainless steel auger for samples collected at 6-10 inch depths. The sample collection process must be completed in accordance with American Society for Testing and Materials (ASTM), Active Standard D4823-95 (2008) Standard Guide for Core Sampling and ASTM D5633-04 (2008) for scoop sampling. Global positioning system (GPS) data utilizing Trimble GeoExplorer Unit must be collected for each sample location.

Soil sample analysis must include the following: 10 surface samples at a 0-2 inch depth (See Figure 4, Points 1, 2, 4, 5, 7- 12) and 2 subsurface samples at a 6-10 inch depth (See Figure 4, Points 3 and 6) at TA-16 to be analyzed for:

- a. Target analyte list (TAL) metals analysis for 24 analytes using *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846)* Methods 6010B, 6020, and 7471A;
- b. Dioxins/Furans analysis for using EPA Method 8290A ;
- c. High explosives analysis for using EPA Method 8330B;
- d. Analysis for semi-volatile organic compounds (SVOCs) using EPA Method 8270C;
- e. Analysis for volatile organic compounds (VOCs) using EPA Method 8260B;
- f. Perchlorate anion (ClO_4^-) by EPA Method 6850 or 6860;
- g. Diesel range organics (DRO) by EPA Method 8015B;

h. Nitrates by EPA Method 9056A

Field quality control samples: One field duplicate soil sample must be collected for each analytical suite. A single trip blank for VOC analysis must be submitted per day per shipping cooler.

The samples must be shipped to an independent contract analytical laboratory for analysis using the methods described above. Results and data from the sample collection activity must be submitted with the TA-16-399 closure Report.

6.1.3 Cleaning of Sampling Equipment

A disposable sampler is considered clean only when directly removed from a factory-sealed wrapper. Reusable decontamination equipment, including protective clothing and tools, and sampling equipment used during closure activities must be scraped, as necessary, to remove residue and cleaned prior to each use in accordance with Permit Section 11.10.2.12 (Consent Order Section IX.B.3). Sampling equipment rinse blanks must be collected and analyzed only if reusable sampling equipment is used.

6.2 Sample Management Procedures

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that must be followed during the sampling activities associated with the closure.

6.3 Sample Documentation

Sampling personnel must complete and maintain records to document sampling and analysis activities. Sample documentation must include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

6.3.1 Chain-of-Custody

Chain-of-custody forms must be maintained by sampling personnel and Sample Management Office personnel until the samples are relinquished to the analytical laboratory. Chain of custody protocols must ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector shall be responsible for the integrity of the samples collected until properly transferred to another person.

The sample collector shall document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples shall sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory shall return the completed chain-of-custody form to the Facility and it must become part of the permanent sampling record documenting the sampling efforts.

6.3.2 Sample Labels and Custody Seals

A sample label must be affixed to each sample container. The sample label must include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. GPS coordinates recording the location the sample was collected.

A custody seal must be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

6.3.2.1 Sample Logbook

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook must include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

Any deviations from the sampling plan must be noted in the sample logbook and reported in the TA-16-399 closure certification report.

6.4 Sample Handling, Preservation, and Storage

Samples must be collected and containerized in appropriate pre-cleaned sample containers. Samples that require cooling to 4 degrees Celsius must be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

6.4.1 Packaging and Transportation of Samples

All packaging and transportation activities must meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). The Permittee shall provide the appropriate Facility documents to establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

The samples must be maintained at appropriate temperatures after collection and throughout the shipping process. All samples must be chilled to four degrees Celsius before shipment occurs. Samples must be then wrapped, placed in the DOT approved shipping container with ample blue ice to hold the required temperature. Temperature blanks must be placed in the cooler and sealed with custody tape. Off-site transportation of samples must occur via contract, or common motor carrier, air carrier, or freight. All off-site transportation must be processed through the LANLs packaging and transportation organization unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers. All shipments must be sent overnight delivery. Once received, the analytical laboratory must verify that the custody tape is still intact and measure the temperature of the cooler. All sample information and observations must be recorded and presented in the analytical data package. For all discrepancies the sender must be notified for resolution.

6.5 Sample Analysis Requirements

Samples must be analyzed for all the hazardous constituents listed in Table 2. Samples must be analyzed by an independent laboratory using the methods outlined in SW-846. Analytes, test methods and instrumentation, estimated quantitation limits, and rationale for metals and organic analyses shall be included in the closure Report. If any of the information from this plan has changed at the time of closure, the Permittee shall request that NMED amend this Closure Plan to update all methods in this sampling and analysis plan (SAP).

6.5.1 Analytical Laboratory Requirements

The analytical laboratory must perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2 of this plan. The analytical laboratory must also comply with the mandates outlined in Consent Order Section IX.C and Permit Section 11.10.3. The analytical laboratory must have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Section 6.2.1 of this plan, must be based on the following considerations:

- a. the physical form of the waste;
- b. constituents of interest;

- c. required detection limits (*e.g.*, regulatory thresholds); and
- d. information requirements (*e.g.*, waste classification).

6.5.2 Quality Assurance/Quality Control

All sampling and analysis must be conducted in accordance with quality assurance (QA)/quality control (QC) procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses must be evaluated through the use of QA/QC samples to assess the overall quality of the data produced as specified in the applicable portions of Permit Sections 11.10.2.4.vii, 11.10.2.8.iv and 11.10.3.1. QC samples evaluate precision, accuracy, and the potential for sample contamination associated with the sampling and analysis process which is described in the following sections. Information on calculations necessary to evaluate the QC results is also described below. Analysis must be conducted in accordance with procedures described in SW-846 (EPA 1986, as updated) and Permit Section 11.10.3.

6.5.2.1 Field Quality Control

The field QC samples that must be collected include trip blanks, and field duplicates as required by the applicable requirements of Permit Section 9.4.7.1, 11.10.2.4.vii, and 11.10.2.9.v. Field QC samples must be given a unique sample identification number and submitted to the analytical laboratory as blind samples. Field QC samples must be identified on the applicable forms so that the results can be applied to the associated sample.

6.5.2.2 Analytical Laboratory Quality Control Samples

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures described in EPA SW-846 are the tools employed to measure the degree to which these QA objectives are met, and include method blank, matrix spike, and laboratory duplicate samples. The results for analytical laboratory QC samples must be reported along with the regular sample analyses.

6.5.3 Data Reduction, Verification, Validation, and Reporting

Analytical data generated by the activities described in this Closure Plan must be verified and validated by the analytical laboratory and provided to the Permittee and NMED in an electronic data deliverable format for upload to the LANLs public environmental management system as referenced in 1.10.1 of the Permit. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

6.5.4 Data Reporting Requirements

Analytical results must include all pertinent information about the condition and appearance of the sample-as-received. The level II laboratory analytical data packages shall be included with the closure report for this Unit. The analytical reports must be prepared in accordance with the provisions of Permit Section 11.10.3.1.iv.

7.0 WASTE MANAGEMENT

By removing any hazardous waste or hazardous waste constituents during closure, the Permittees may become a generator of hazardous waste. The Permittee shall control, handle, characterize, and dispose of all wastes generated during closure activities in accordance with this Section (7.0) Permit Section 9.4.5, Permit Attachment C, and Facility waste management procedures, and shall be in compliance with applicable state, federal, and local requirements (*see* 40 CFR § 265.114). These wastes shall include, but are not limited to:

- a. demolition debris;
- b. concrete;
- c. containerized waste;
- d. personnel protective equipment;
- e. soil;
- f. decontamination wash water; and
- g. decontamination waste.

The different types of wastes generated at closure, including the Unit's decontaminated structures and related equipment, and their disposition options (*e.g.*, reuse, recycling, or disposal) are listed in Table 3 of this Closure Plan. Disposable equipment and other small equipment that cannot be decontaminated shall be containerized and managed as waste.

8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the Unit, the Permittee shall submit, by registered mail, a closure certification report for Department review and approval. The Report shall document that the Unit has been closed in compliance with the specifications in this Closure Plan and Permit Section 9.5. The Report shall summarize all activities conducted during closure.

Documentation supporting the independent registered professional engineer's certification must be furnished to the Department before the closure of the Unit will be approved.

9.0 DEPARTMENT CLOSURE ASSESSMENT

Upon submittal of the closure certification report described in Section 8.0 of this Closure Plan, the Permittees shall arrange an on-site closure review with representatives of the Department to assess the completion of the closure activities at the Unit.

10. REFERENCES

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Table 1
Closure Schedule for the Technical Area 16-399 Open Burning Treatment Unit

Activity	Maximum Time Required
Begin closure activities	45 days after approval of the plan
Conduct records review	Completed November 2012
Conduct structural assessment	Completed on July 19, 2012
Documentation of structural assessment	Submitted to Department no later than 45 days after approval of plan
Complete all closure activities	No later than 180 days of initiating closure activities
Submit final closure certification report to the Department.	No later than 60 days after completion of closure activities

Note: The schedule above indicates calendar days in which the listed activities shall be completed from the day closure activities are initiated. Some activities may be conducted simultaneously.

Table 2
Hazardous Waste Constituents of Concern at the TA-16-399 Open Burning Treatment Unit^a

Category	EPA Hazardous Waste Numbers	Specific Constituents
High explosives and associated compounds	D003	HMX, RDX, TNT, PETN, TATB, Tetryl, and mixtures of explosives including; ANFO, Composition B, Cyclotol, IMX-101, PBX 9404, PBX 9407, PBX 9501, PBX 9502, PBX 9601, X0233, X0533, XTX 8003, XTX 8004, LX-02, LX-07, LX-10, and LX-14
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
Semi-volatile Organic Compounds	D030, D036, F004	2,4-Dinitrotoluene, Nitrobenzene
Other constituents of concern		Dioxins/Furans, Perchlorate, and kerosene
Diesel Range Organics	F005, P022	Carbon Disulfide, BTEX, TPH
Nitrates	D002	Nitric Acid,

^a Based on the Unit operating record.

PETN = pentaerythrioltetranitrate (2,2-bis[(nitroxy)methyl]-1,3-propanediol dinitrate

HMX = cyclotetramethylenetetranitramine (octahydro, 1,3,5,7-tetranitro, 1,3,5,7-tetrazocine)

RDX = cyclonite (cyclo-1,3,5-trimethylene-2,4,6-trinitramine)

TNT = 2,4,6-trinitrotoluene

TATB = 1,3,5-triamino-2,4,6-trinitrobenzene

BTEX= Benzene, Toluene, Ethylbenzene, and Xylene

TPH= Total Petroleum hydrocarbons

Table 3
Potential Waste Materials, Waste Types, and Disposal Options

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-hazardous solid waste	Subtitle D landfill
	Hazardous waste	The PPE must be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Decontamination water	Non-hazardous liquid waste	High Explosives Waste Treatment Facility (HEWTF) or sanitary sewer
	Hazardous waste	Waste must be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Metal covers/trays		
	Hazardous waste	Treated to remove HE and recycled or disposed of in subtitle C or D landfill.
Soil and tuff	Non-hazardous solid waste	Subtitle D landfill
	Hazardous waste	Waste must be treated to LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Non-hazardous solid waste	Recycled, salvaged, or sent to a Subtitle D landfill
	Hazardous waste	Waste must be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded sampling and decontamination equipment	Non-hazardous solid waste	Subtitle D landfill
	Hazardous waste	Waste must be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

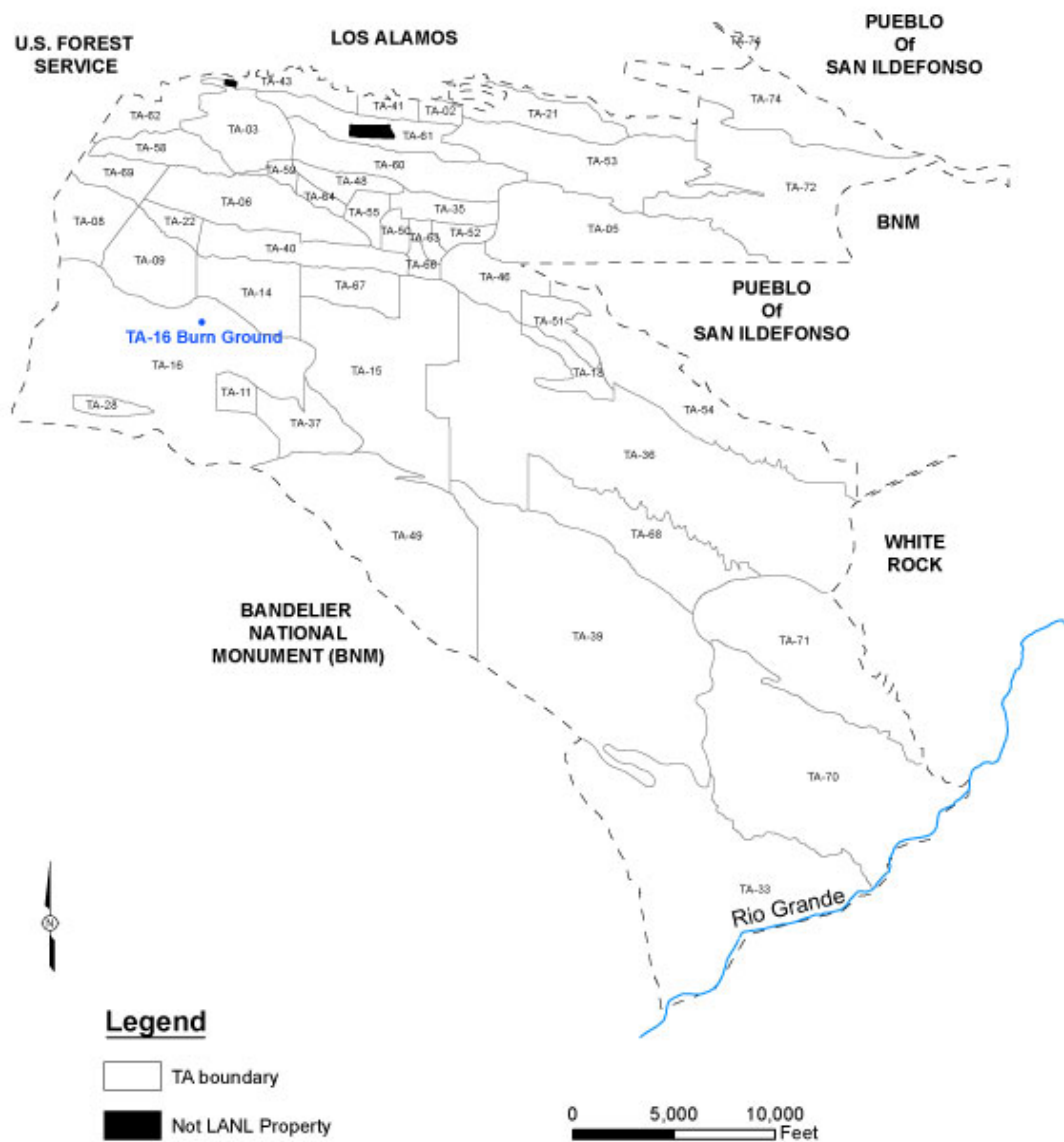


Figure 1: Technical Area 16 (TA-16) Location Map

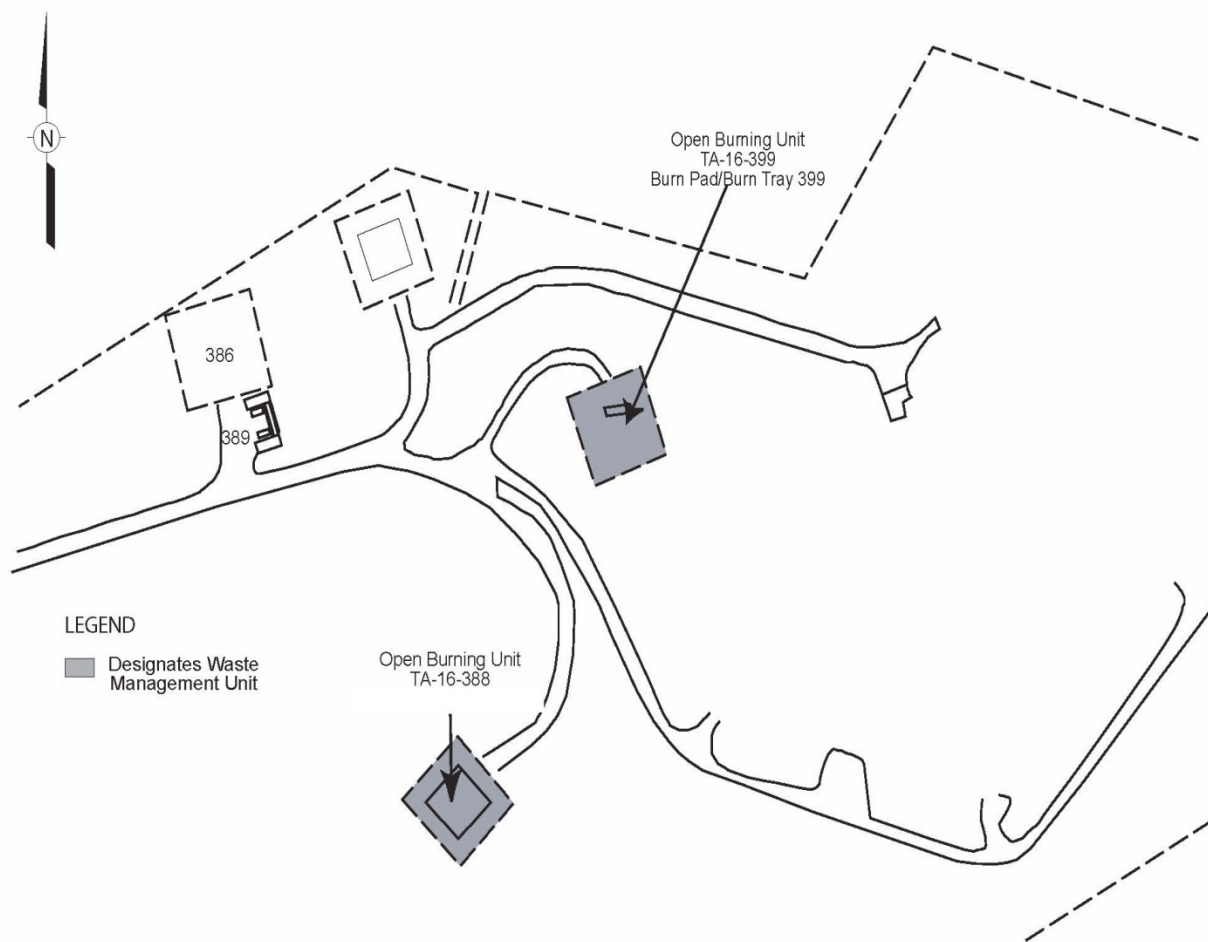


Figure 2: Technical Area 16-399 Open Burning Treatment Unit Layout

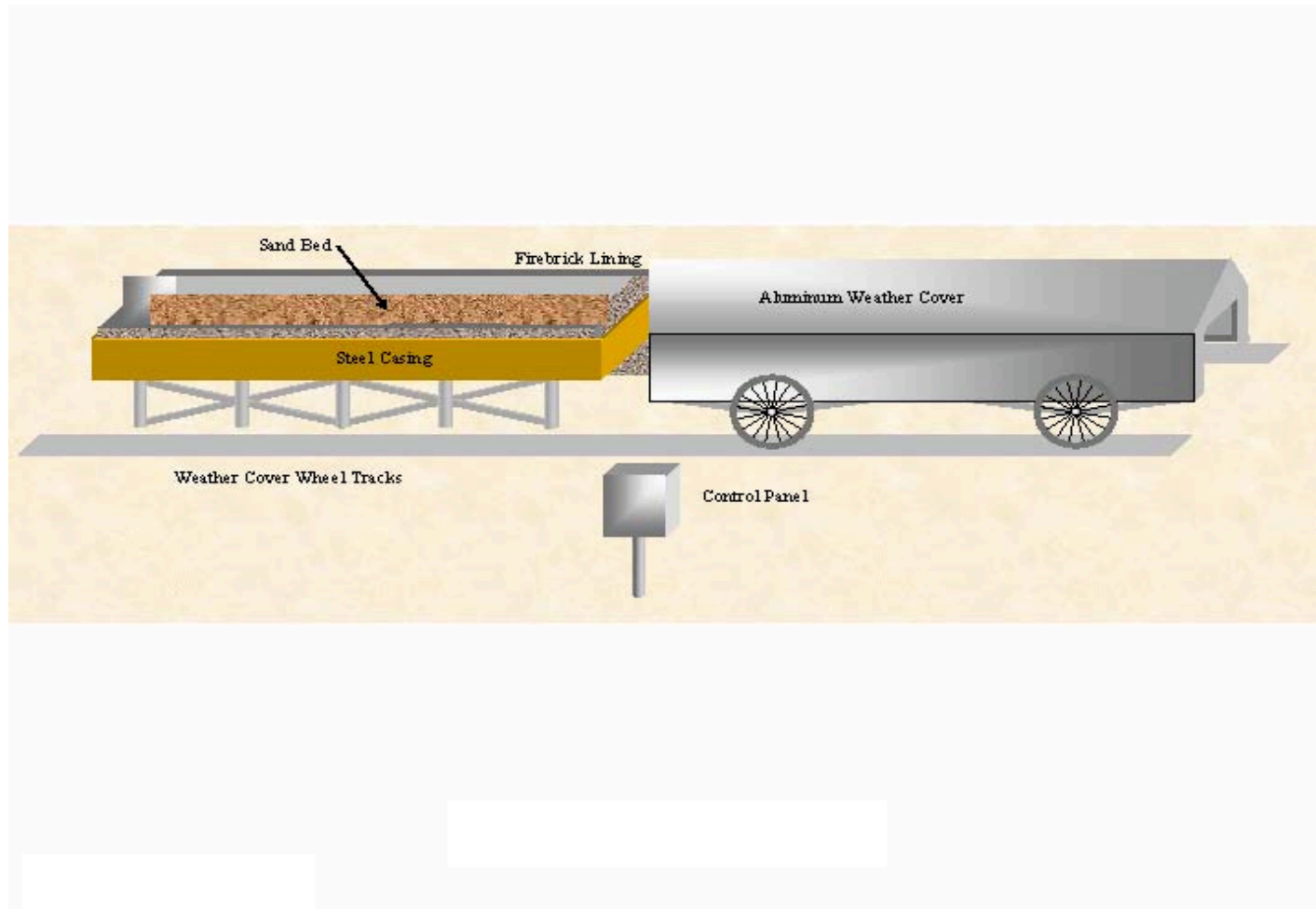


Figure 3: Technical Area 16-399 Open Burning Treatment Unit Configuration

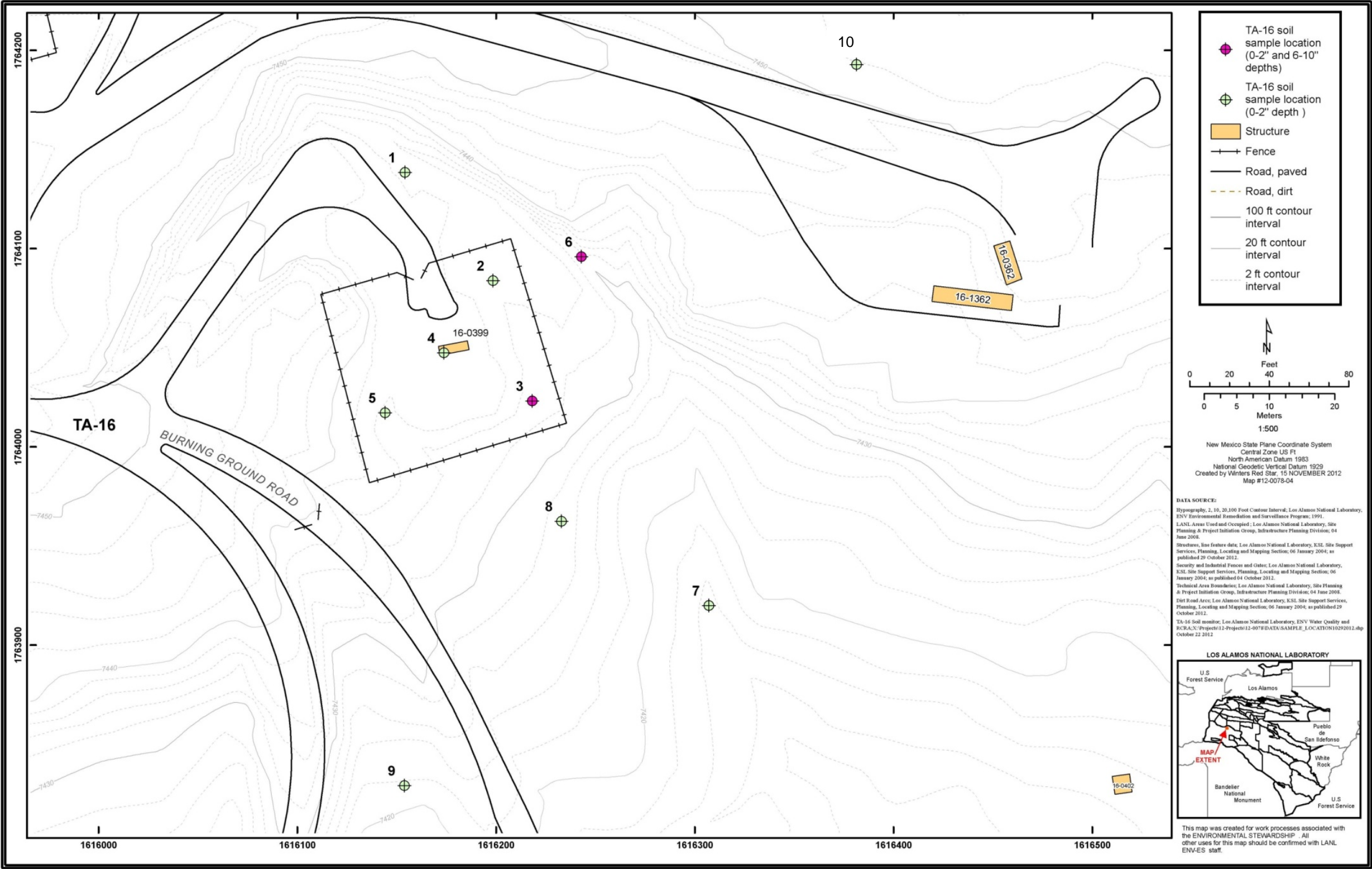


Figure 4: Technical Area 16-399 Soil Sample Locations for Closure of Unit

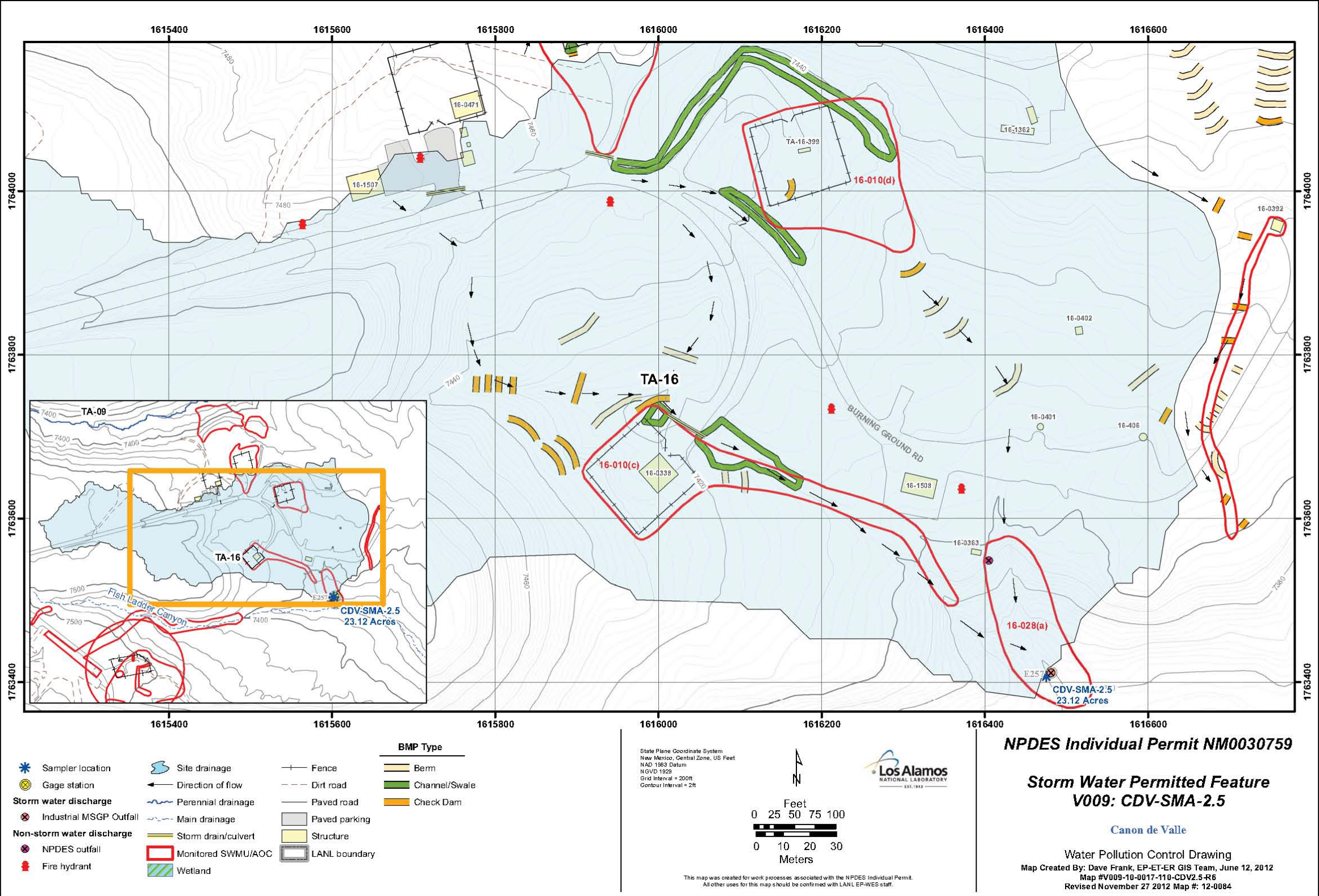


Figure 5: Storm Water Monitoring Station at TA-16 Burn Ground