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FACT SHEET NOVEMBER 19, 2013

DRAFT CLOSURE PLAN FOR TECHNICAL AREA 16 OPEN BURN AREA 399 LOS ALAMOS NATIONAL LABORATORY LOS ALAMOS COUNTY, NEW MEXICO

Facility Name: Los Alamos National Laboratory
EPA Identification Number: NM0890010515

GENERAL BACKGROUND

The New Mexico Environment Department (NMED) proposes to issue a Draft Closure Plan for the interim status Open Burn (OB) Treatment Unit at TA-16, Open Burn Area 399 and Burn Tray (hereafter referred to as TA-16-399 or the Unit). The Final Closure Plan will allow Los Alamos National Laboratory (LANL or the Facility) to begin closure procedures pursuant to the New Mexico Hazardous Waste Act, NMSA 1978 §§74-4-1 through 74-4-14 and the New Mexico Hazardous Waste Management Regulations, 20.4.2.2 NMAC.

LANL is located in Los Alamos County, an incorporated county in north-central New Mexico, and approximately 60 miles north northeast of Albuquerque and 25 miles northwest of Santa Fe. LANL occupies approximately 40 square miles on the Pajarito Plateau. The U.S. Department of Energy (DOE) / National Nuclear Security Administration (DOE/NNSA) owns the facility, and the DOE/NNSA and Los Alamos National Security, LLC (LANS) operate the Facility. These entities are collectively referred to as "Permittees" in this Fact Sheet and the Draft Closure Plan.

If approved, the Closure Plan allows the Permittees to close and decontaminate the TA-16-399 OB Unit, which was previously used to treat High Explosive (HE) waste pursuant to the New Mexico's Hazardous Waste Act (HWA) and the Federal Resource Conservation and Recovery Act (RCRA). Prior to issuing a Final Closure Plan NMED is required to release a Draft Closure Plan for public comment pursuant to

20.4.1.901.A (3) NMAC. This Fact Sheet is intended to facilitate public review of that Draft Closure Plan.

DRAFT CLOSURE PLAN SUMMARY

NMED has prepared this Draft Closure plan based on the information provided by the Permittees in their “Interim Status Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray, Revision 2.0” (Revision 2) dated December 11, 2012, and referenced by LA-UR-12-26782. The Draft Closure Plan proposes the closure interim status unit TA-16-399. Details of proposed closure activities at the Unit are summarized below.

Description of the Unit

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 in the Draft Closure Plan). 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.

The TA-16-399 Burn Tray (see Figure 2 in the Draft Closure Plan) 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 of the Draft Closure Plan). 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 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. NMED proposes expanding the analytical suite since the Permittees were unable to provide documentation of waste treatment for the life of the Unit.

Removal and Decontamination of Open Burn Tray 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.

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.

Sampling and Analysis at the Open Burn Tray

The Draft Closure Plan proposes that 8 grab soil samples (0-2" depth) and 2 composite soil samples (0-2" and 6-10" depths) will be collected. The field QC samples that must be collected include trip blanks, and field duplicates. The Draft Closure Plan proposes that no surface water and groundwater samples will be collected as part of this Plan since sampling would be duplicative of sampling practice already in place for the unit under the Inter Facility-Wide Ground Water Plan (IFGWP).

PUBLIC REVIEW OF THE ADMINISTRATIVE RECORD

A copy of the administrative record may be reviewed at the following location:

NMED - Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Monday - Friday from 8:00 a.m. to 5:00 p.m.
Contact: Pam Allen
(505) 476-6000

A copy of the Draft Closure Plan and the administrative record is also available on the NMED website at <http://www.nmenv.state.nm.us/hwb/>. To obtain a copy of the administrative record or a portion thereof or for further information contact Dave Cobrain at (505) 476-6055 or at the address given below.

The 30-day public comment period begins on **November 19, 2013**, and ends on **December 19, 2013**.

Any person who wishes to comment on this action or request a Public Hearing should submit written or electronic mail (e-mail) comment(s) with the commenter's name and address to the address below. Only comments or requests received on or before **5:00 p.m. December 19, 2013**, will be considered.

Dave Cobrain, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Ref: Los Alamos National Laboratory TA-16 Open Burn Unit 399
Email: dave.cobrain@state.nm.us

Written comments must be based on the information available for review and include, to the extent practicable, all referenced factual materials. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a Public Hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requester represents; (3) a statement of any objections to the Draft Closure Plan; and (4) a statement of the issues which the commenter proposes to raise for consideration at the hearing. NMED will provide a 30 day notice of a Public Hearing, if scheduled.

NMED must ensure that the Draft Closure Plan is consistent with the New Mexico Hazardous Waste Management Regulations. All written comments submitted will be considered in formulating a final decision and may result in NMED modifying or disapproving the Draft Closure Plan. NMED will respond in writing to all public comments received. This response will specify which provisions, if any, of the Draft Closure Plan have been changed in the final decision and the reasons for the change, and will provide a brief description of all public comments. All persons presenting written comments or who request notification in writing will be notified of the decision by mail. The final decision will also be posted on the NMED website.

After consideration of all the written public comments received, NMED will approve, modify, or disapprove the Draft Closure Plan. If NMED modifies or disapproves the Draft Closure Plan, NMED will provide to the Permittees a copy of the Draft Closure Plan and a detailed written statement containing the reasons for the modifications or disapproval by mail.

NMED will make the final decision publicly available and will notify the Permittees by certified mail. The final decision will constitute a final agency decision and may be appealed as provided by the HWA.

ARRANGEMENTS FOR PERSONS WITH DISABILITIES

Any person with a disability requiring assistance or auxiliary aid to participate in this process should contact J.C. Borrego, NMED, Room S-4303, P.O. Box 5469, 1190 St. Francis Drive, Santa Fe, NM 87502-6110, email: juancarlos.borrego@state.nm.us, phone number: (505) 827-0424. TDD or TDY users please access Mr. Borrego's number via the New Mexico Relay Network at 1-800-659-8331.