



*Environmental Protection Division  
Water Quality & RCRA Group (ENV-RCRA)*  
P.O. Box 1663, K490  
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Los Alamos Site Office, A316*  
3747 West Jemez Road  
Los Alamos, New Mexico 87545  
(505) 667-5794/FAX (505) 667-5948

Date: July 13, 2011  
Refer To: ENV-RCRA-11-0121

Mr. John E. Kieling  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

Dear Mr. Kieling:

**SUBJECT: REQUEST FOR REVIEW AND APPROVAL OF CLOSURE  
DOCUMENTATION FOR THE TECHNICAL AREA 54, AREA L STORAGE  
SHAFTS 36 AND 37 INTERIM STATUS CONTAINER STORAGE UNIT, LOS  
ALAMOS NATIONAL LABORATORY, EPA ID# NM 0890010515**

In 2005 and 2006 a sampling and analysis plan and closure certification report were submitted to the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB) for the Technical Area 54 (TA-54), Area L, Storage Shafts 36 and 37. However, these storage shafts are listed as "TA-54 Area L Container Storage Unit (below ground)" within *Table J-1, Active Portion of the Facility*, in Attachment J of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit). Table J-1 lists the unit as "Wastes removed and unit undergoing closure, closure certification incomplete." Therefore, the National Nuclear Security Administration (NNSA) and Los Alamos National Security LLC (LANS) (collectively the Permittees) hereby request the review of the documents discussed below and identification of issues that lead to the incomplete status of this certification of closure.

The Permittees conducted closure activities in 2005 for the TA-54, Area L, Storage Shafts 36 and 37, which together comprise an interim status hazardous waste management unit used as an S99- other storage unit. Closure of the unit was performed in accordance with the "*Los Alamos National Laboratory Technical Area 54, Area L, Storage Shafts 36 and 37 Closure Sampling and Analysis Plan*," which was submitted to the NMED-HWB on April 21, 2005 (NMED LANL Administrative Record Index no. 11881). Decontamination of each shaft was achieved by removal of all additional waste residuals, dust, and debris at the base of each shaft using a high-capacity vacuum unit equipped with high-efficiency particulate air filtration. Surface wipe samples were collected from the floor and walls of each shaft and analyzed to verify decontamination. A human health risk assessment was performed and residual levels of waste lead residues on the interior of each shaft demonstrated no unacceptable risk to human health or the environment.

The *Closure Certification Report for the Technical Area 54, Area L Storage Shafts 36 and 37 Container Storage Unit* was submitted to the NMED-HWB on October 19, 2006 (NMED LANL Administrative Record Index no. 11957). The report contains a more specific description of closure activities and certifications by facility representatives and by an independent registered professional engineer, as required by 40 CFR § 265.115. The report submittal included an electronic copy of the complete data packages on an enclosed compact disk. The unit has been stabilized awaiting final resolution since that time.

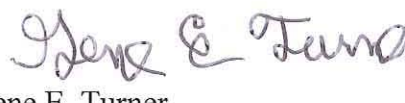
If further discussion is necessary, please contact Mark Haagenstad of the Water Quality and RCRA Group at (505) 665-2014 to schedule a meeting or if additional information or copies of the documents are necessary.

Sincerely,



Anthony R. Grieggs  
Group Leader  
Water Quality & RCRA Group  
Los Alamos National Laboratory

Sincerely,



Gene E. Turner  
Environmental Permitting Manager  
Environmental Projects Office  
Los Alamos Site Office  
National Nuclear Security Administration

ARG:GET:PS/lm

Enclosures: a/s

Cy: Steve Pullen, NMED/HWB, Santa Fe, NM,  
Gene Turner, LASO-EO, A316  
Carl A. Beard, PADOPS, A102  
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ENV-RCRA File, K490  
IRM-RMMSO, A150





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Domestic Return Receipt form with sections for SENDER (complete this section) and COMPLETE THIS SECTION ON DELIVERY. Includes fields for signature, name, date, and service type.

on report were submitted to the MED-HWB) for the Technical storage shafts are listed as "TA-54 ...ive Portion of the Facility, in ...ous Waste Facility Permit (the ...ing closure, closure certification ...n (NNSA) and Los Alamos request the review of the ...e incomplete status of this ...rea L, Storage Shafts 36 and 37, ...ent unit used as an S99- other ...e "Los Alamos National ...sure Sampling and Analysis Plan," ...LANL Administrative Record

WHICH WAS SUBMITTED TO THE ... Index no. 11881). Decontamination of each shaft was achieved by removal of all additional waste residuals, dust, and debris at the base of each shaft using a high-capacity vacuum unit equipped with high-efficiency particulate air filtration. Surface wipe samples were collected from the floor and walls of each shaft and analyzed to verify decontamination. A human health risk assessment was performed and residual levels of waste lead residues on the interior of each shaft demonstrated no unacceptable risk to human health or the environment.