



ESHID-603372

***Environmental Protection & Compliance Division***

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***National Nuclear Security Administration***

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*Date:* **FEB 27 2019**

*Symbol:* EPC-DO: 19-061

*LA-UR:* 19-21378

*Locates Action No.:* U1900054

Mr. John Kieling, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

**Subject: Documentation of Structural Assessment Technical Area 16-399 Burn Tray, Los Alamos National Laboratory EPA ID# NM0890010515**

This letter documents a structural assessment of the Technical Area (TA) 16-399 Burn Tray at the Los Alamos National Laboratory (LANL) in 2012 and includes information regarding subsequent visits to the site for assessment purposes. The hazardous waste management unit to be closed consists of a burn tray, firebrick, burn tray cover, wheels, tracks, a concrete pad, and an electrical box. The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) requested approval of a revised closure plan in May 2012. In November 2018, the operating contractor at LANL changed from LANS to Triad National Security, LLC (Triad).

Staff members of the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) visited the TA-16-399 Burn Tray on July 19, 2012, to conduct a structural assessment and discuss finalization of proposed locations for soil samples at the site. During the assessment, the unit's physical condition was inspected and evidence of any releases was assessed. The concrete pad, burn tray, firebrick, track, and wheels were found to be in good condition and free of damage. No additional soil sample locations were proposed at that time. Discussions of the day concluded with a proposed path forward for approval of the closure plan.

In September 2012, DOE and LANS received a notification of disapproval of the closure plan for the unit that included changes to the closure plan as agreed upon during the structural assessment. DOE and LANS responded with a revised closure plan in December 2012. In November 2013 the NMED-HWB issued a public notice with the intent to approve a revised closure plan titled: *Draft Closure Plan Open Burning Treatment Unit Technical Area 16-399 Burn Tray*. Comments to the plan were provided in December 2013.

Beginning April 2017, DOE and LANS began informal communications with NMED-HWB staff regarding the draft closure plan. These phone calls and email correspondence concerned resolution of comments made to the closure plan during the 2013 public comment period. Various site visits were conducted by DOE and LANS during this time to confirm changes to the closure plan could be executed. Changes to the closure plan include the removal of the concrete pad and five additional soil sample locations.

This letter hereby documents the structural assessments at the TA-16-399 Burn Tray from the notes of subject matter experts who attended the site visits. As there were no photographs taken during the July 19, 2012, structural assessment; photographs of the unit and the surrounding area (prior to removing the burn tray and other equipment) will be included in the closure certification report to document the condition of the unit directly prior to removal. DOE and Triad request approval of this approach.

Closure activities will begin on February 28, 2019, upon the initiation of facility service requests and kick-off meetings regarding the schedule for removal of equipment and subsequent soil sample collection. Closure activities will be completed no later than 180 days from February 28, 2019.

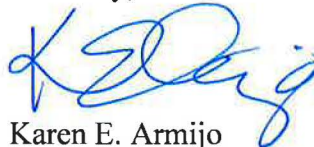
If you have questions or comments regarding this submittal, please contact Patrick Padilla (Triad) at (505) 667-3932 or Karen Armijo (DOE) at (505) 665-7314.

Sincerely,



Enrique Torres  
Division Leader  
Environmental Protection & Compliance  
Triad National Security, LLC

Sincerely,



Karen E. Armijo  
Permitting and Compliance Program Manager  
Los Alamos Field Office  
U.S. Department of Energy  
National Nuclear Security Administration


ET/KEA/PLP:xxx

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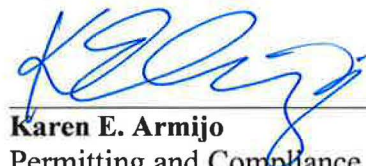
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**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
**Enrique Torres**  
Division Leader  
Environmental Protection and Compliance Division  
Triad National Security, LLC

2/26/19  
\_\_\_\_\_  
Date Signed

  
\_\_\_\_\_  
**Karen E. Armijo**  
Permitting and Compliance Program Manager  
Los Alamos Site Office  
National Nuclear Security Administration  
U.S. Department of Energy

27 Feb 2019  
\_\_\_\_\_  
Date Signed





COPY



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