



Department of Energy  
 Field Office, Albuquerque  
 Los Alamos Area Office  
 Los Alamos, New Mexico 87544

SEP 22 1995

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*Jim S. Cople*



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dr. Joel Dougherty  
 Air and Waste Management Division  
 U. S. Environmental Protection Agency  
 Region 6  
 1445 Ross Avenue, Suite 1200  
 Dallas, Texas 75202-2733

Dear Dr. Dougherty:

Subject: Notice of Completion of Milestone, Federal Facility Compliance Agreement, Milestone LD 200

The purpose of this letter is to inform you that we have completed the LD 200 milestone in the Federal Facility Compliance Agreement (FFCAgreement) between the Department of Energy (DOE) and the Environmental Protection Agency (EPA) regarding land disposal restriction requirements for Low-Level Mixed Waste (LLMW) and other mixed and hazardous wastes at the Los Alamos National Laboratory (LANL). The milestone which DOE has completed, LD 200, "Complete treatment of applicable LLMW," is the processing of recyclable lead bricks using processes including LANL's lead decontamination trailer. You were verbally notified by telephone of our completion of the milestone on September 14, 1995, by LANL.

By letter and telephone on August 15, 1995, and by letter on August 29, 1995, DOE had requested an extension to this milestone in accordance with Section XIII, Extensions, of the FFCAgreement. That request is hereby withdrawn.

In our August 15, 1995 letter, we discussed the initial 1993-1994 lead decontamination campaign, how the portion of LANL's lead inventory corresponding to the LD 200 milestone was identified and processed, that additional materials had been identified that required decontamination and our subsequent campaign to decontaminate newly-identified items. As indicated in our letter, from April 15, 1993 through October 1994, all containers that were initially identified in LANL's waste databases as containing "lead bricks" were processed, a total of approximately 58 tons.

LANL then became aware that a number of additional containers of lead materials in the inventory may have included one or more processable lead bricks and thus may have met the criteria of "applicable LLMW" according to the terms of milestone LD 200. Because the additional bricks were commingled with other forms of lead, they had not been identified in earlier



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assessments. Approximately 397 lead "items" were identified in our supplemental investigation as the maximum potential universe remaining to be processed. Of these, 168 were eliminated because they were found to contain lead shapes and items other than bricks; and 34 items requiring additional characterization (which will be conducted outside the scope of LD 200, as discussed below) were eliminated. Of the remaining 195 items, 97 are characterized in LANL's records as containing only bricks. LANL opened, inspected, and sorted 185 of the 195 containers, and processed all bricks found therein. The remaining ten containers were subsequently found to have been already processed during the 1993-1994 lead decontamination campaign. In its second campaign, LANL opened, segregated, and processed a total of 296 containers, with weights per container ranging from 100 to 12,500 pounds. A total of 4,165 bricks were processed in this second campaign, weighing from 12.5 to 25 pounds each.

As stated in our August 15, 1995 letter, lead bricks not meeting the LD 200 criteria, and lead waste in other physical forms that was not suitable for the lead decontamination trailer, will be worked off through other FFC Agreement milestones or through the Site Treatment Plan when it is issued by the New Mexico Environment Department.

DOE remains committed to implementing the FFC Agreement until the State issues an order requiring compliance with the Site Treatment Plan being developed under the Federal Facilities Compliance Act. If you have any questions, please call me at (505) 665-5026 or Jody Plum at (505) 665-5042. Thank you for your assistance and understanding with regard to this matter.

Sincerely,



Jon Mack  
Waste Management Program Manager  
Office of Environment and Projects

LAAMEP:2JP-017

cc:

M. Potts  
RCRA Enforcement Branch (6H-CS)  
U. S. Environmental Protection  
Agency, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733  
B. Garcia, Bureau Chief  
Hazardous and Radioactive  
Materials Bureau  
New Mexico Environment Department  
2044 Galisteo St., Building A  
P. O. Box 26110  
Santa Fe, NM 87505