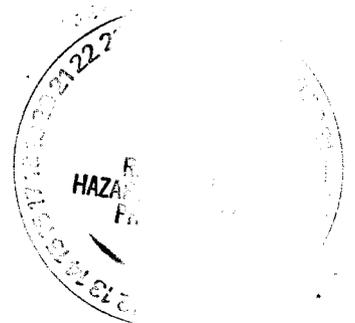




Department of Energy

Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

SEP 22 1995



Red LANK FFC/90-95

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

Dear Mr. Garcia:

Subject: Follow-up Information on the Site Treatment Plan (STP), Federal Facility Compliance Act (FFCA), September 20, 1995 NMED Meeting

Thank you for the opportunity to comment on the referenced document, and to meet with the New Mexico Environment Department (NMED) on September 20, 1995, to discuss our comments and concerns. This letter provides the Department of Energy's (DOE) and Los Alamos National Laboratory's (LANL) response to two requests made by you and Mr. James Seubert during this meeting. The meeting addressed our comments on the referenced document (reference our letter to you dated September 18, 1995) in the spirit of supporting you in making the STP and Order as straightforward to implement as possible for all concerned, and meeting fully the requirements of the FFCA. The following clarifications relate to the referenced sections of our September 18, 1995 comment letter.

1. In our comment No. 14, page 5, we referenced page 14, LANL CPV Section 3.2.1, regarding Hydrothermal Processing/Off-Site Treatment. In our letter, we requested that the language, Activities, and Compliance Dates in this Section be deleted, and replaced with the enclosed text (modified from SNL/NM CPV, Section 3.2.1, page 10). A marked-up copy of the LANL CPV text, indicating the deletions, and of the proposed replacement text, changing the SNL language to be specific to LANL's use of this technology, is enclosed. It indicates that the planned delivery of this technology to LANL will be in February 2002, as reported by DOE's Grand Junction Project Office.
2. In our comment No. 15, page 5, we discussed page 16, LANL CPV Section 3.4.1 (Lead Decontamination). The CPV language limits the activity to on-site options or use of the existing trailer. As we reported to you, lead bricks amenable to recycling were successfully processed under the FFCAgreement by September 15, 1995.



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That effort was accomplished in two campaigns. From April 15, 1993 through October 1994, most of the containers that were initially identified in LANL's waste databases as containing "lead bricks" were processed through the lead decontamination trailer, a total of approximately 58 tons of lead waste. LANL then became aware that a number of additional containers of lead materials in the inventory may include one or more processable lead bricks and thus may meet the criteria of "applicable LLMW" according to the terms of FFC Agreement milestone LD 200. Because the additional bricks were commingled with other forms of lead, they were not identified in earlier assessments.

Approximately 397 lead "items" were identified in our supplemental investigation as the maximum potential universe of lead-contaminated waste still in inventory that was received prior to March 15, 1994. Of these, 168 were eliminated because their descriptions specifically excluded lead bricks (e.g., lead acid batteries); and 34 items were eliminated because they require additional characterization (which will be conducted outside the scope of LD 200). Ninety-seven (97) of the remaining 195 items are characterized in LANL's records as containing only bricks. In its second campaign, LANL opened, inspected, and sorted 185 of the 195 containers, and processed all bricks found therein. The remaining ten containers identified in the August 29, 1995 letter were subsequently found either to have been already processed during the 1993-1994 lead decontamination campaign, or to have information in the records demonstrating that the waste did not include lead bricks. 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.

This constituted a large proportion of the 56.20 cubic meter volume listed under MWIR waste ID number LA-W930 in the treatability group table in this Section. We are still in the process of reconciling the total volumes and weights of processed lead with the volume reported in the MWIR, as part of the close-out activities of our second decontamination campaign.

While ideally this volume should be adjusted before issuing the CPV, we pointed out in our meeting that revising this value alone would make it inconsistent with other volumes in the CPV, which refer to the waste identified in the Background Volume as of October 6, 1995. This was discussed in our letter under our comment No. 23, where we requested that you define the term "existing waste," as it is used in the Activities in all the CPV compliance schedules. Therefore, for the sake of consistency, it may be preferable to leave the volume as listed, and update all volumes in the first Annual Update in January 1996.

Please keep in mind, however, that in our comments, we requested that the text in this CPV Section be revised to allow for other decontamination options, and for other (non-recycling) uses of the decontaminated lead, including treatment/disposal of lead forms that cannot be decontaminated or reused. A proposal for alternate language was presented in our comment letter.

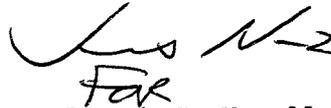
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Benito Garcia

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We appreciate the opportunity to have met with you to discuss our comments and concerns. We are available to discuss this information, or the concerns we raised in our comments and in our meeting, with you at any time. If you have any questions, please call me at (505) 665-5027, Jon Mack at (505) 665-5026, or Jody Plum at (505) 665-5042. Thank you again for the opportunity to comment.

Sincerely,



Joseph C. Vozella
Assistant Area Manager
Office of Environment and Projects

LAAMEP:6JP-003

Enclosure

cc w/enclosure:

J. Seubert
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
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J. Dougherty
Air and Waste Management Division
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1445 Ross Avenue
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H. Haynes, Counsel, LAAO
J. Mack, AAMEP, LAAO
S. Brown, LC-GL, LANL, MS-A187
D. Erickson, ESH-DO, LANL, MS-K491
A. Gancarz, CST-DO, LANL, MS-J515
M. Williams, WMD, AL

cc w/o enclosure:

J. Plum, AAMEP, LAAO
J. White, ESH-19, LANL, MS-K490
P. Schumann, ESH-19, LANL, MS-K498

3.2.1 Hydrothermal Processing

Treatability Group(s):

LLMW for Hydrothermal Processing/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
halogenated organic liquids	LA-W907	D001, D002, D003, D007, D009, D018, D019, D022, D028, D029, D035, D043, F001, F002, F003, F005, U077, U080, U226, U227, U228, U236	385	16.58
nonhalogenated organic liquids	LA-W908	D001, D002, D003, D004, D007, D008, D009, D011, D018, D038, D040, F002, F003, F004, F005, U002, U019, U169, U188, U220, U246	275	14.34
bulk oils	LA-W909	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	28	3.75
PCB wastes with RCRA components	LA-W910	D008, D039, F002	4	0.74
Totals			692	35.41

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
inorganic solid oxidizers	LA-W923	D001, D003, D005	55	0.20
Totals			55	0.20

Treatment Technology:

~~The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site. LANL has an RD&D RCRA permit for this technology that would have to be modified for mixed waste studies if development of the process exceed volume limits of treatability studies. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall immediately notify the NMED Project Manager in writing. DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.~~

ADD NEW INSERT HERE

Activity	Compliance Dates
A. Complete technology development	09/30/96
B. Submit appropriate permit application to NMED, or	3/30/97
C. Submit a notification of intent to perform treatability study to the NMED a minimum of 45 days prior to commencement of study	3/30/97
D. Initiate construction	As specified in RCRA permit
E. Commence system testing	As specified in RCRA permit
F. Complete treatment of existing waste to applicable regulatory standards	As specified in RCRA permit

3.3 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done (MWIR Treatment ID LA-S701)

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
lead wastes - TBD	LA-W924	D003, D008	186	51.44
mercury wastes - TBD	LA-W925	D007, D008, D009, P001	63	18.30
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	10	1.23
biochemical laboratory wastes	LA-W927	D001, D003	9	1.34
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	1288	268.17
Totals			1556	340.30

Treatment Technology:

The following steps will be taken to properly characterize this waste:

- Conduct additional generator interviews
- Prepare a sampling plan for waste not adequately characterized
- Conduct sampling and analysis
- Determine treatment options

3.1.1.9 Oxidation (On-Site by DOE MTU)

TG-16 Cyanide Waste (0.001M³)

The preferred treatment technology for this treatability group is Oxidation.

Oxidation Schedule (On-Site by DOE MTU)

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	December 16, 1996
B. Receipt of MTU on-site July 1, 2001	Modify existing RCRA permit for RMWMF
C. Complete system testing & commence operation	August 15, 2001
D. Begin treating mixed waste	August 15, 2001
E. Complete treatment of existing mixed wastes to applicable regulatory standards	September 1, 2001

3.2 Mixed Waste For Which Technology Must Be Developed

SNL/NM has one treatability group for which the preferred treatment option is a treatment technology that requires adaptation in order to treat hazardous waste that is radioactive and may contain PCBs.

3.2.1 Hydrothermal Processing (On-Site by DOE Mobile Treatment Unit)

~~TG-41 Organic Liquids II (0.7 M³)~~

The preferred destruction treatment technology option for this treatability group is Hydrothermal Processing which is a technology that needs development for adaptation to treat radioactive and PCB-bearing waste. This treatment technology is being adapted at LANL and is expected to be developed into a mobile treatment unit. The GJPO schedule for deployment of the unit indicates its possible availability to SNL/NM after February 2001. Respondents shall submit treatment schedules and options as a revision for NMED's approval by November 30, 1998.

LANL

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3.3 Other Types of Mixed Waste Activities

This section describes activities that will be performed to reduce the low level mixed waste in inventory at SNL/NM.

NEW INSERT FOR LANL-CPU