



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

JUN 26 1996



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Janice Archuleta  
Hazardous & Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galisteo Street, Bldg. A  
P. O. Box 26110  
Santa Fe, NM 87505

Dear Ms. Archuleta:

Subject: Notice of Completion of Schedule for Further Lead Processing, Activity in  
Section 3.4.1 in the Site Treatment Plan (STP), Federal Facility Compliance  
Order (FFCO), October 4, 1995

The purpose of this letter is to inform you that the second Activity listed in Section 3.4.1 on page 15 of the Compliance Plan Volume (CPV, Exhibit A) of the STP requires that by June 30, 1996, the Department of Energy (DOE) and the University of California "provide (a) schedule for development of lead processing techniques and options." Los Alamos National Laboratory (LANL) was required to complete this schedule for those lead shapes and forms found to be "not amenable to processing using the lead decontamination trailer."

This lead is legacy Low-Level Mixed Waste (LLMW) contained in the treatability group "lead for surface decontamination," MWIR waste ID number LA-W930. Section 3.4.1 of the LANL STP discusses two approaches to lead decontamination. The first is the operation of the on-site lead decontamination trailer. This trailer was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. Prior to the issuance of the FFCO and STP, this trailer was used to successfully decontaminate over 140,000 pounds of lead in compliance with the Federal Facility Compliance Agreement milestone LD200. This effort included an extensive investigation of drum contents, with sorting as necessary, to locate lead bricks in legacy LLMW inventory. As a result, to the best of our knowledge, effectively all of the lead currently contained in this treatability group (MWIR waste ID number LA-W930) amenable to decontamination in the on-site lead decontamination trailer has been processed.

The remaining lead will be processed using commercially available lead decontamination services. Any lead not acceptable for commercial lead decontamination, plus any lead unsuccessfully decontaminated, will be designated for treatment by macroencapsulation and disposal at an off-site facility or for recycle through an off-site capability (yet to be developed), such as metal melting to create shielding blocks or a DOE lead bank. Nonconforming items will be reassigned to appropriate treatability groups in accordance with the FFCO.

The process for using commercial lead decontamination services is a multi-step process to ensure that as much of the lead as possible is recycled instead of treated and disposed. The first step involves the identification of the acceptance criteria for existing, proven commercial lead



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decontamination services. The lead waste will then be segregated and sorted into appropriate lead groupings (e.g., lead sheets, shot, shavings, pieces, pigs, etc.) and the volume and weight of each grouping will be measured. A Request for Proposal then will be issued to solicit proposals from the various commercial lead decontamination services. After award of the contract(s) for lead decontamination services, the lead will be decontaminated and recycled.

### Schedule

The following schedule is submitted in fulfillment of the second Activity in CPV Section 3.4.1. Should NMED determine it necessary, this schedule may be resubmitted as a formal request for STP amendment or revision.

Activity	Compliance Date
A. Segregate lead waste into decontamination groupings	7/31/97
B. Complete shipment of waste to commercial decontamination operations	3/31/98
C. Determine treatment/disposal or other recycle options for lead waste not acceptable for commercial decontamination	6/30/98
D. Complete treatment and disposal operations or other recycle operations	12/2/98
E. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at off-site facility

A Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO is enclosed herewith. We are available to discuss this information with you at any time. If you have any questions, please call me at (505) 665-5042 or Ken Hargis at (505) 667-2347. Thank you for the opportunity to provide this information.

Sincerely,

  
Jody Plum

Office of Environment and Projects

LAAMEP:3JP-005

Enclosure

cc:

See page 3

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cc w/enclosure:

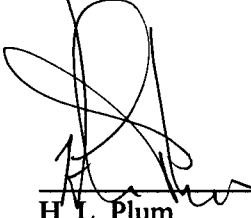
**Benito Garcia, Bureau Chief**  
**Hazardous & Radioactive Materials Bureau**  
**New Mexico Environment Department**  
**2044 Galisteo Street, Bldg. A**  
**P. O. Box 26110**  
**Santa Fe, NM 87505**

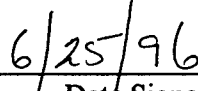
## CERTIFICATION

I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.

  
Kenneth Hargis  
STP Project Manager, EM Division  
Los Alamos National Laboratory  
Operator

  
Date Signed

  
H. L. Plum  
Regulatory Permitting and Compliance Manager  
Los Alamos Area Office  
U. S. Department of Energy  
Albuquerque Operations  
Owner/Operator

  
Date Signed