



Department of Energy
 Albuquerque Operations Office
 Los Alamos Area Office
 Los Alamos, New Mexico 87544
 SEP 10 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Red LANL FF10/97

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

Dear Ms. Archuleta:

Subject: Treatability Group "*Soil with Heavy Metals*" - Request for Transfer to
 Treatability Group LA-W911, Los Alamos National Laboratory (LANL) Site
 Treatment Plan (STP)

The purpose of this letter is to request that the New Mexico Environment Department (NMED) transfer two (2) of the 59 items listed in the LANL STP in the treatability group "*soil with heavy metals*," MWIR waste ID LA-W904, to treatability group (LA-W911, "*organic-contaminated combustible solids*"). This was issue (3) of the five issues we discussed with you in our August 14, 1997 meeting, as documented in our August 26, 1997 letter. Others will be addressed in separate transmittals.

The transfer of these wastes from MWIR waste ID LA-W904 to LA-W911 is proposed to be conducted in accordance with the Federal Facility Compliance Order (FFCO) requirements in Section XI, "*Deletion of Waste*," as amended May 20, 1997; Section VIII, "*Addition of New Covered Waste*"; and Section X.B.4, "*Revisions*," as amended May 20, 1997. The details of this request are presented in the following sections of this letter.

1. Background.

Activity 3.1.2B, in Section 3.1.2 of the CPV (Revisions 1.0, 2.0, 3.0, February 25, 1997) currently requires that the Department of Energy (DOE) and the University of California (UC) "[C]omplete shipping waste" in three treatability groups off-site for treatment by September 30, 1997. These shipments have been completed for all wastes in two of the treatability groups, and for 46 of the 59 items in the treatability group "*soil with heavy metals*," MWIR waste ID no. LA-W904. For the remaining 13 items in this treatability group, DOE and UC requested an extension to the September 30, 1997 compliance date for Activity 3.1.2B to December 29, 1997. DOE and UC believe that once four of these 13 items can be shipped, Activity 3.1.2B will have been completed for all *applicable* waste in the treatability group "*soil with heavy metals*," and that the remaining nine items in this treatability group should more appropriately be addressed in other ways.



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During the recharacterization effort associated with the original October 18, 1996 reclassification request for some of these 59 LA-W904 waste items, eight items (six from TA-64 and two from TA-2) were found to be incorrectly assigned to this treatability group (and a ninth was verified not to exist). The following table, excerpted from our August 26, 1997 letter, recaps the status of the nine covered waste items proposed to be removed from this treatability group (item groupings correspond to those presented in our October 18, 1996 and March 26, 1997 letters). This letter focuses on the two TA-2 items (unshaded in Table 1).

Table 1. Items to be Removed From LA-W904

Waste Sub-Stream Source (LANL Technical Area #)	Number of Items	Current Status	Next Steps
TA-64	6 items (were bulked into 2)	PCB>52 ppm present	Transfer will be requested to move items to appropriate treatability group (LA-W910, <i>PCB wastes with RCRA components</i>) (See Part 2 of letter).
TA-2	2	Items verified as incorrectly assigned to LA-W904	Transfer will be requested to move items to appropriate treatability group (LA-W911, <i>Organic-contaminated combustible solids</i>).
TA-35	1	Item verified as never received into storage	Deletion will be requested.
Subtotal	9 Items		To Be Removed From LA-W904

This treatability group consists of a number of waste sub-streams originating from different LANL Technical Areas, as described in our October 18, 1996 letter.

2. Transfer to Another Treatability Group.

Based on visual inspection of the contents of these containers and a review of supporting data, DOE and UC are requesting that the two LA-W904 items (0.4164 m³) from TA-2 be moved to another treatability group (MWIR waste ID no. LA-W911, "*organic-contaminated combustible solids*") (see Enclosure A). As such, they will become subject to the already-existing Activities and Compliance Dates specified for LA-W911 wastes in Section 3.1.4 of the STP. No new Compliance Dates are requested.

The transfer of these wastes from MWIR waste ID LA-W904 to LA-W911 is proposed to be conducted in accordance with the FFCO requirements in Section XI, "*Deletion of Waste*," as amended May 20, 1997; Section VIII, "*Addition of New Covered Waste*"; and Section X.B.4, "*Revisions*," as amended May 20, 1997. This transfer is a two-step process. First, DOE and UC are requesting that the two LA-W904 items be deleted from LA-W904. Second, they are to be transferred into LA-W911 (a shift of existing wastes is considered an addition of waste under FFCO Section VIII, because the shift results in an increased volume in LA-W911). For a small volume such as this one, this increase falls below the threshold established in Section X.B.4; therefore, the addition is exempt from the revision requirements of FFCO Section X.

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Enclosure A presents the information required for deletions in FFCO Section IX.B, and supports the requirements of Sections VIII and X. Enclosure B provides replacement language for the affected portions of the CPV for NMED's approval.

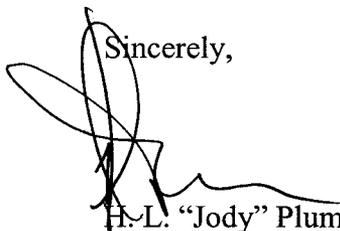
Summary.

In this letter, DOE and UC are requesting that the two LA-W904 items (0.4164 m³) from TA-2 be moved to another treatability group (MWIR waste ID no. LA-W911, "*organic-contaminated combustible solids*"). The other LA-W904 transfer and deletion requests discussed in our August 26, 1997 letter will be transmitted in separate documents to simplify tracking and processing.

A Certification Statement prepared in accordance with the requirements of Section XX, "*Documents, Information, and Reporting Requirements*," of the FFCO is enclosed herewith (Enclosure C).

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 Mr. Ken Hargis at (505) 667-2347. Thank you again for meeting with us on August 14, 1997, and for your consideration of these requests.

Sincerely,



H.L. "Jody" Plum
Office of Environment

LAAMEP:6JP-036

Enclosures

cc w/enclosures:

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

W. Medina
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Building A
P. O. Box 26110
Santa Fe, NM 87505

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Janice Archuleta

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bcc w/enclosures:

H. Haynes, Office of Counsel, LAAO
J. Seubert, Scientech, LAAO
K. Hargis, EM-WM, LANL, MS-J591
S. Brown, LC-GL, LANL, MS-A187
T. Stanford, EM-SWO, LANL, MS-J595
R. Murphy, EM-SWO, LANL, MS-J593
J. Kelly, EM-SWO, LANL, MS-J593
A. Millensted, EM-SWO, LANL, MS-J593
J. White, ESH-19, LANL, MS-K490
P. Schumann, ESH-19, LANL, MS-K498
ESH-19 Group File, LANL, MS-K490
J. Grimm, WMD, AL

ENCLOSURE A

TREATABILITY GROUP "SOIL WITH HEAVY METALS" - REQUEST FOR TRANSFER TO TREATABILITY GROUP LA-W911, LOS ALAMOS NATIONAL LABORATORY (LANL) SITE TREATMENT PLAN

The following portions of this enclosure follow the requirements of Section IX.B, "Deletion of Waste," of the FFCO, as amended May 20, 1997; Section VIII, "Addition of New Covered Waste"; and Section X.B.4, "Revisions," as amended May 20, 1997. Enclosure B provides replacement language for the affected portions of the CPV for NMED's approval.

A.1. Description of the proposed transfer. Activity 3.1.2B, in Section 3.1.2 of the CPV (Revisions 1.0, 2.0, 3.0, February 25, 1997) currently requires that DOE and UC "[C]omplete shipping waste" in three treatability groups off-site for treatment by September 30, 1997. These shipments have been completed for all wastes in two of the treatability groups, and for 46 of the 59 items in the treatability group "soil with heavy metals," MWIR waste ID no. LA-W904. For the remaining 13 items in this treatability group, DOE and UC requested an extension to the September 30, 1997 compliance date for Activity 3.1.2B to December 29, 1997. DOE and UC believe that once four of these 13 items can be shipped, Activity 3.1.2B will have been completed for all *applicable* waste in the treatability group "soil with heavy metals," and that the remaining nine LA-W904 items should more appropriately be addressed in other ways.

During the recharacterization effort associated with the original October 18, 1996 reclassification request for some of these 59 LA-W904 waste items, eight items (six from TA-64 and two from TA-2) were found to be incorrectly assigned to this treatability group (and a ninth was verified not to exist). Based on this recent analytical data, DOE and UC are requesting that the two LA-W904 items (0.4164 m³) from TA-2 be moved to another treatability group (MWIR waste ID no. LA-W911, "organic-contaminated combustible solids"). As such, they will become subject to the already-existing Activities and Compliance Dates specified for LA-W911 wastes in Section 3.1.4 of the STP.

A.2. Transfer Process. The transfer of these wastes from MWIR waste ID LA-W904 to LA-W911 is proposed to be conducted in accordance with FFCO requirements in Section XI, "Deletion of Waste," as amended May 20, 1997; Section VIII, "Addition of New Covered Waste"; and Section X.B.4, "Revisions," as amended May 20, 1997. This transfer is a two-step process. First, DOE and UC are requesting that the two LA-W904 items be deleted from LA-W904. Second, they are to be transferred into LA-W911 (a shift of existing wastes is considered an addition of waste under FFCO Section VIII, because the shift results in an increased volume in LA-W911).

A.3. Deletion Information. The first step is to delete the items from LA-W904. The following table provides the rationale for this transfer. It presents the information required for deletions in FFCO Section IX.B, and supports the requirements of Sections VIII and X. This is as follows: "...a description of the applicable waste code, waste form and volumes; if applicable,

characterization methodology used along with supporting information; and other relevant information regarding deleted waste..."

The characterization methodology employed for both containers included file searches; reviews of generator information; and visual inspection of contents.

Tabel A-1. Items to be Removed From LA-W904

Item ID#	Volume (cu. meters)	Item Desc. on Waste Data Form	EPA HAZ. Waste Number	Waste Form/Rationale for Assignment to New Group
1017225	0.2082	TA-2 soil with lead and <2.OnCi/g rad - Treatability Group - #3	D008	This container contained lab trash and oily rags. Upon visual inspection the contents were not consistent with those of the other containers from this waste group. The other containers in this waste stream were filled with concrete pieces (large and small) and soil. Photographs were taken as to their contents. This container would be best suited for treatability group LA-W911 (<i>Organic contaminated combustible solids</i>)
1003718	0.2082	TA-2 soil with lead and <2.OnCi/g rad - Treatability Group - #3	D008	This container contained lab trash and oily rags. Upon visual inspection the contents were not consistent with those of the other containers from this waste group. The other containers in this waste stream were filled with concrete pieces (large and small) and soil. Photographs were taken as to their contents. This container would be best suited for treatability group LA-W911 (<i>Organic contaminated combustible solids</i>)
Totals	0.4164			

A.4. Need for a Revision. The second step is to add the items to LA-W911. FFCO Section VIII requires that waste additions follow the revision requirements specified in Section X.B. For a small volume such as this one, however, this volume increase (0.4164 cu. m.) falls below both thresholds established in Section X.B.4, as amended (i.e., it is less than 10% of the new treatability group's volume (28.32 cu. m.), and it is less than 1 cu. m. as well). Therefore, the addition is exempt from the revision requirements of FFCO Section X.

Enclosure B provides replacement language for the affected portions of the CPV for NMED's approval.

**ENCLOSURE B
PROPOSED CPV AMENDMENT TEXT**

[B.1 Redline/strikeout version]

NOTE TO REVIEWERS: New language to be inserted is redlined; language to be deleted from current CPV is given in ~~strikeout text~~.

3.1.2 ~~Commercial~~ Off-site Treatment by Stabilization or Macroencapsulation

Treatability Group(s):

LLMW for ~~Commercial~~ Stabilization

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Lead blankets	LA-W903	D007, D008	4	0.74
Soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	5759	10.11 10.53
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	36	39.32
Totals			9799	50.1750.59

Treatment Technology:

The waste will be treated at an off-site facility that stabilizes or macroencapsulates wastes. Should DOE decide to treat waste at an off-site non-commercial facility, DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
A. Complete all regulatory requirements prior to shipping waste	05/30/97
B. Complete shipping waste	12/29/97 09/30/97
C. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.1.4 Thermal Desorption (MWIR Treatment ID GJ-S801B)

LLMW for Thermal Desorption/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Organic-contaminated combustible solids	LA-W911	D001, D008, F001, F002, F003, F005	309307	28.742832
Totals			309307	28.742832

LLMW for Thermal Desorption

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D027, D030, D032, D033, D034, D042, D043, F001, F002, F004, F005	80	7.82
Totals			80	7.82

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	11/16/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	02/01/01
D. Complete treatment of existing wastes to applicable regulatory standards, or	02/14/02
E. Complete shipping of existing wastes to an off- site treatment facility.	02/14/02
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

**ENCLOSURE B
PROPOSED CPV AMENDMENT TEXT**

[B.2 Clean copy version]

3.1.2 Off-site Treatment by Stabilization or Macroencapsulation

Treatability Group(s):

LLMW for Stabilization

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Lead blankets	LA-W903	D007, D008	4	0.74
Soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	57	10.11
ER soils	LA-W905	D028, D029, F001, F005, D010, D011	36	39.32
Totals			97	50.17

Treatment Technology:

The waste will be treated at an off-site facility that stabilizes or macroencapsulates wastes. Should DOE decide to treat waste at an off-site non-commercial facility, DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
A. Complete all regulatory requirements prior to shipping waste	05/30/97
B. Complete shipping waste	12/29/97
C. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.1.4 Thermal Desorption (MWIR Treatment ID GJ-S801B)

LLMW for Thermal Desorption/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Organic-contaminated combustible solids	LA-W911	D001, D008, F001, F002, F003, F005	309	28.74
Totals			309	28.74

LLMW for Thermal Desorption

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D027, D030, D032, D033, D034, D042, D043, F001, F002, F004, F005	80	7.82
Totals			80	7.82

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	11/16/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	02/01/01
D. Complete treatment of existing wastes to applicable regulatory standards, or	02/14/02
E. Complete shipping of existing wastes to an off-site treatment facility.	02/14/02
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

ENCLOSURE C

CERTIFICATION

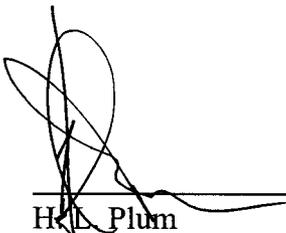
**TREATABILITY GROUP "SOIL WITH HEAVY METALS" - REQUEST FOR
TRANSFER TO TREATABILITY GROUP LA-W911, LOS ALAMOS NATIONAL
LABORATORY (LANL) SITE TREATMENT PLAN**

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 M. Hargis
Manager of Operations
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator

10 Sept. 1997
Date Signed



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

9/8/97
Date Signed