



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

OCT 0 6 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Ms. Archuleta:

Subject: Lead Decontamination Activities, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO), October 4, 1995 - Notification of Completion of Activity in Section 3.4.1

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of completion of a required activity in the LANL Site Treatment Plan (STP). This is the first of two separate activities identified with the letter "A" in Section 3.4.1 of the Compliance Plan Volume (CPV, Exhibit A, Rev. 1.0) of the STP. By September 30, 1997, LANL was required to "(C)omplete lead decontamination" for those lead shapes and forms to be "*processed using the lead decontamination trailer.*" This CPV activity has been completed. This notification is provided as required by Section XX of the FFCO.

The lead in question is "*lead for surface decontamination,*" MWIR waste ID number LA-W930, consisting originally of 125 items with a total volume of 56.20 cubic meters (m³). Section 3.4.1 of the STP was finalized in October 1995 with the presumption that all lead in this treatability group fell into two broad categories: lead amenable to decontamination in the on-site lead decontamination trailer, and lead not amenable to decontamination in the on-site lead decontamination trailer.

Lead "amenable to processing." The portion of this category consisting of lead bricks was decontaminated on-site using the lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The September 30, 1997 compliance date applies to the lead waste in this category only. Prior to the issuance of the FFCO, this trailer, as supplemented by additional decontamination methods, was used to successfully decontaminate approximately 83 items, or 14.43 m³ from LA-W930, plus lead items from other treatability groups. These approximately 83 LA-W930 items, processed prior to the effective date of this STP, comprised all of the lead in this treatability group that was subject to the Federal Facilities Compliance Agreement (FFCAgreement) milestone LD200 for decontamination of lead bricks.

As discussed in our August 8, 1997 letter, LANL completed segregation of all its known LA-W930 waste into decontamination groupings prior to July 31, 1997. This segregation process resulted in identification of six additional items (6.59 m³) in the original LA-W930 inventory that contained lead amenable to processing using the on-site trailer. This lead was



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Ms. Janice Archuleta

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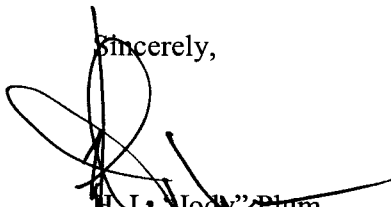
decontaminated on-site by September 25, 1997, and has been sent to LANL's on-site recycling contractor for release to an off-site commercial metal recycler. Therefore, as of September 25, 1997, this CPV activity has been completed.

Lead "not amenable to processing." The September 30, 1997 compliance date does not apply to the lead in the second category of the original LA-W930 inventory (i.e., the lead not amenable to processing using the on-site trailer, approximately 42 items or 41.78 m³). A schedule was provided to NMED on June 26, 1996, in accordance with Activity B listed in Section 3.4.1 of the CPV (Exhibit A, Rev. 1.0) of the STP, describing the activities intended to apply to the lead waste in this category. A revision is being prepared in order to incorporate this schedule formally into the CPV, as discussed in our August 8, 1997 letter. As shown in Table 1 of that letter, LANL has approximately 42 "not amenable" items remaining in the original LA-W930 inventory (six of which have been verified not to exist), that will be managed in accordance with the activities proposed in the June 26, 1996 schedule, following NMED's approval of the schedule in the revisions.

Additions to LA-W930. Since October 4, 1995, lead has been added to the original LA-W930 inventory, as noted in the March 1996 and March 1997 *Annual Updates* (see Table 1 in our August 8, 1997 letter). This added inventory will be incorporated formally into the CPV inventory when Revision 5.0 is submitted for approval. Additional compliance dates will be requested as revisions if necessary.

A certification statement is provided as an enclosure to this letter. Please contact me at (505) 665-5042 or Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,



H. L. Vody, Plum
Office of Environment

LAAMEP:3JP-064

Enclosure

cc w/enclosure:

Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street, Building A
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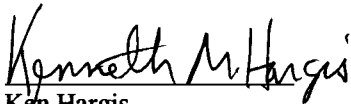
Mr. Walter Medina
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
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OCT 08 1997

CERTIFICATION

**LEAD DECONTAMINATION ACTIVITIES, LOS ALAMOS NATIONAL LABORATORY
(LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO), OCTOBER 4, 1995 -
NOTIFICATION OF COMPLETION OF ACTIVITY IN SECTION 3.4.1**

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.



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

2 October 1997
Date Signed



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

8 October 1997
Date Signed