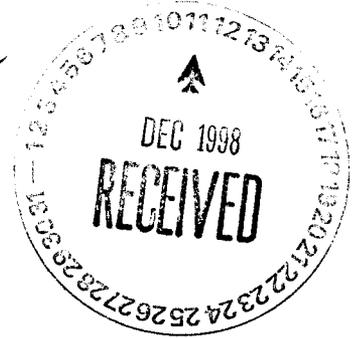


FFCO



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

3-  
my FFCO/FFCA  
file B-



DEC 09 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Ms. Archuleta:

**Subject:** Site Treatment Plan (STP) Compliance Plan Volume (CPV) Milestone Activity 3.3 D, Los Alamos National Laboratory (LANL), Federal Facility Compliance Order (FFCO), October 4, 1995

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of the completion of STP CPV Milestone Activity 3.3 D. This milestone activity required DOE and UC to "*Complete determination of treatment options*," by December 20, 1998, for mixed waste requiring further characterization or for which technology assessment has not been done.

Milestone Activity 3.3 D applies to wastes that are in the following treatability groups: "*Lead Wastes - TBD*," MWIR Waste ID LA-W924; "*Mercury Wastes - TBD*," MWIR Waste ID LA-W925; "*Compressed Gases - TBD*," MWIR Waste ID LA-W926; "*Biochemical Laboratory Wastes*," MWIR Waste ID LA-W927; and "*Dewatered Treatment Sludge*," MWIR Waste ID LA-928. A description of treatment options for each treatability group is described below.

***Lead Wastes - TBD***, MWIR Waste ID LA-W924:

Most of the lead wastes have been treated off-site by a commercial facility that utilizes macroencapsulation. Some of the waste has been sent to an off-site commercial recycle facility. A few items (6 items out of the total number of 129) do not have a treatment option at this time. These items consist of isotopic lead stringers that were placed in concrete shafts at TA-54. The stringers contain steel tubes filled with a mixture of concrete and lead. The stringers became irradiated through particle beam interactions. The high levels of gamma emitting radionuclides (Co and Mn) preclude the safe handling and treatment of this material at this time. These items will continue to be safely managed in accordance with LANL's mixed waste interim status requirements.

***Mercury Wastes - TBD***, MWIR Waste ID LA-W925:

The only treatment option determined applicable for this treatability group is mercury amalgamation. Only one facility is permitted to treat mercury and radioactive contaminated waste at this time. LANL is currently studying a new process to remove elemental and ionic forms of mercury from debris, and may participate in a treatability study in the coming year.



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*Compressed Gases – TBD*, MWIR Waste ID LA-W926:

We have reviewed all commercial and experimental processes and determined no options are currently available for treatment and disposal that meet the requirement of this waste stream. We will continue to store the waste and pursue all possible avenues. In an effort to identify suitable treatment methods for radioactive gas cylinders and advance industry capability, LANL participated this year in a gas cylinder treatability study with a commercial laboratory. Nine items from this treatability group were shipped to the laboratory. The treatability study is still in progress. One cylinder has a high tritium content and no treatment options have been identified. DOE and UC have formally proposed this waste as a "Technology Needs/Opportunity" request to the DOE/AL Site Technology Coordination Group.

*Biochemical Laboratory Wastes*, MWIR Waste ID LA-W927:

All of these wastes have been accepted for treatment and disposal. The treatment consists of distillation or fuel blending followed by destruction in a permitted and licensed industrial boiler.

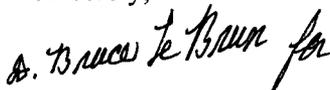
*Dewatered Treatment Sludge*, MWIR Waste ID LA-928:

This waste has been accepted for treatment consisting of repackaging and/or stabilization followed by placement in a RCRA-permitted landfill.

Treatment options have been determined for all of the wastes in Section 3.3 of the CPV. No treatment options exist at this time for the isotopic lead stringers in treatability group "*Lead Wastes – TBD*," MWIR Waste ID LA-W924, and the compressed gases in treatability group "*Compressed Gases – TBD*," MWIR Waste ID LA-W926. No change is being requested at this time to meet the next milestone in this CPV section, which consists of completing "*shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups*" by December 20, 2000.

Enclosed is a Certification Statement prepared in accordance with the requirements of Section XX, "*Documents, Information, and Reporting*," of the FFCO. Please contact me at (505) 665-5042 or Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,



H. L. "Jody" Plum  
Office of Environment

LAAME:3JP-094

Enclosure

cc w/enclosure:

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

Janice Archuleta

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DEC 09 1998

bcc w/enclosure:

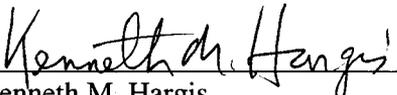
H. Haynes, Office of Counsel, LAAO  
S. Brown, LC-GL, LANL, MS-A187  
J. Rochelle, LC-GL, LANL, MS-A187  
T. Baca, EM-DO, LANL, MS-J591  
K. Hargis, EM/WM, LANL, MS-J591  
B. Martin, EM/WM, LANL, MS-J591  
T. Stanford, EM-SWO, LANL, MS-J595  
J. Kelly, EM-SWO, LANL, MS-J595  
A. Jackson, ESH-19, LANL, MS-K490  
J. Grimm, WMD, AL

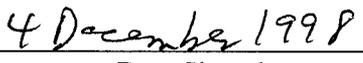
# CERTIFICATION

## SITE TREATMENT PLAN (STP) COMPLIANCE PLAN VOLUME (CPV) LOS ALAMOS NATIONAL LABORATORY (LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO) OCTOBER 4, 1995

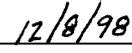
### MILESTONE ACTIVITY 3.3 D

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  
Program Manager  
Waste Management Program  
Environmental Management Programs  
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