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ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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August 30, 1999

H.L. Plum
STP Project Manager
Office of Environments and Projects
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

Dear Mr. Plum:

RE: Approval of Amendment 3.0 to the CPV, STP Milestone Activity 3.3.1(E), LANL-FFCO, October 4, 1995

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has received the above captioned amendment request from the Department of Energy (DOE) and the University of California (UC) regarding the transfer of three items (11.42 cubic meters) from Treatability Group "Lead for Surface Decontamination," MWIR Waste ID LA-W930-5 to the Mixed Transuranic (MTRU) category, and the transfer of one item (4.25 cubic meters) within the same Treatability Group, "Lead for Surface Decontamination," MWIR Waste ID LA-W930-5 to subgroup MWIR Waste LA-W930-6.

Based on the information submitted with the proposal, NMED/HRMB approves the above-described Treatability Group transfers. NMED also acknowledges the certifications enclosed and will include the proposal and clean copy text with LANL's Order. Though the Milestone Activity completion date of July 31, 1999 has passed for items in these groups, NMED acknowledges that it was not responsive in the request dated June 30, 1999. The new Milestone Activity date of December 2, 1999 is recognized for the one item transferring to the subgroup.

This approval is granted for the items described in this amendment only, any additional amendment requests must be made under separate cover. If you have any questions, please call me at (505) 827-1508.

Sincerely,

John M. Tymkovich
FFCO Project Manager
RCRA Inspection and Enforcement Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department

cc: James Bearzi, Chief, Hazardous and Radioactive Materials Bureau
Stu Dinwiddie, RCRA Permits Program Manager
Walter Medina, Environmental Specialist
Susan McMichael, OGC/NMED



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3.3.1 Lead Decontamination

Treatability Group(s):

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface decontamination	LA-W930-0	0	0.00	40	37.81	40	37.81
	LA-W930-5			36	22.14	36	22.14
Totals		0	0.00	40 36	37.81 22.14	40 36	37.81 22.14

Note: See below for additional wastes in this treatability group

Treatment:

This treatability group contains two categories of lead for decontamination:

- The first category is lead in the original LA-W930-0 inventory that is amenable to decontamination in the on-site lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The trailer is on-site and has operated, but needs an upgrade for prolonged operation.
- The lead in the second category is lead in the original LA-W930-0 inventory that is not amenable to decontamination in the on-site lead decontamination trailer, plus subsequent additions to the original inventory shown in Appendix B. This lead will be processed using other on-site decontamination processes, such as dry sandblasting or hand-scrubbing, or sent to off-site lead decontamination services.

Any lead not acceptable for on-site or off-site lead decontamination, plus any lead unsuccessfully decontaminated, will be designated for treatment and disposal at an off-site facility, or for recycle through an off-site capability, such as metal melting to create shielding blocks or a DOE lead bank. Non-conforming items will be reassigned to appropriate treatability groups in accordance with the FFCO.

Should DOE decide to treat or recycle waste at an off-site non-commercial facility in lieu of plans to treat or recycle such waste on-site, the 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/recycle option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment/recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling 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/recycling facility.

Lead shapes and forms in the first category.

Activity	Compliance Date
A. Complete lead decontamination	09/30/97

Lead shapes and forms in the second category.

Activity	Compliance Date
A. Provide schedule for development of lead processing techniques and options	06/30/96
B. Segregate lead waste into decontamination groupings	07/31/97
C. Complete shipment of wastes to decontamination operations, or	12/02/98

D. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/98
E. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/99
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

The following additional wastes will require management in the second category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface contamination	LA-W930-6	0	0.00	14 15	12.06 16.31	14 15	12.06 16.31
Totals		0	0.00	14 15	12.06 16.31	14 15	12.06 16.31

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Date
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/00
J. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

**CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.**

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

| To date, there have been nine revisions and ~~two~~ three amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's STP *Annual Update*, and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	12/29/97	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	12/29/97	Added volumes reported in FY95 and FY96 <i>Annual Updates</i> (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	11/30/98	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies,
Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.

LANL CPV
Proposed Amendment 3.0
June 1999

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	<i>to be added</i>	Added and deleted volumes reported in FY98 <i>Annual Update</i> to certain treatability groups
Amendment 3.0	STP/CPV	<i>to be added</i>	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.

3.3.1 Lead Decontamination

Treatability Group(s):

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface decontamination	LA-W930-0 LA-W930-5	0	0.00	36	22.14	36	22.14
Totals		0	0.00	36	22.14	36	22.14

Note: See below for additional wastes in this treatability group

Treatment:

This treatability group contains two categories of lead for decontamination:

- The first category is lead in the original LA-W930-0 inventory that is amenable to decontamination in the on-site lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The trailer is on-site and has operated, but needs an upgrade for prolonged operation.
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		No. Items	Net volume (m ³)	No. Items	Net volume (m ³)	No. Items	Net volume (m ³)
lead for surface contamination	LA-W930-6	0	0.00	15	16.31	15	16.31
Totals		0	0.00	15	16.31	15	16.31

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Date
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/99
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