

RED LANL FFCO/CI

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Environmental Science & Waste Technology/Waste Management
Off-Site Source Recovery (OSR) Project
P.O. Box 1663, Mail Stop: J552
Los Alamos, New Mexico 87545

Date: October 30, 2001
Refer to: E/WMSR:01-033

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Michael Chacon
STP Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park East, Bldg. 1
Santa Fe, New Mexico 87505

SUBJECT: STATUS OF MILESTONE ACTIVITIES 3.1.10 (A), 3.2 (E), and 3.2 (J), FEDERAL FACILITY COMPLIANCE ORDER (FFCO), SITE TREATMENT PLAN (STP), COMPLIANCE PLAN VOLUME (CPV), LOS ALAMOS NATIONAL LABORATORY (LANL).

Dear Mr. Chacon,

The purpose of this letter is to provide to the New Mexico Environment Department (NMED) the status of Milestone Activities 3.1.10 (A), 3.2 (E) and 3.2 (J) for mercury waste in the LANL FFCO, STP, CPV and to notify our intention to request, in the next STP Annual Revision, the addition into the STP of 3 mercury debris waste items that were returned from a treatability study.

Milestone Activity 3.1.10 (A) requires the Department of Energy (DOE) and the University of California (UC) to, "[c]omplete shipping of existing wastes to an off-site treatment facility or complete parallel option," for waste in Treatability Group, "Elemental Mercury," MWIR Waste ID LA-W920 by the Compliance Date of 11/15/01. Milestone Activity 3.2 (E) requires the DOE and the UC to, "[c]omplete shipping of existing wastes to an off-site treatment facility or submit documentation assigning waste items to applicable treatability groups or complete parallel option," for waste in Treatability Group, "Mercury Wastes - TBD," MWIR Waste ID LA-W925 by the Compliance Date of 12/20/01. Milestone Activity 3.2 (J) requires the DOE and the UC to, "[c]omplete shipping of existing wastes to an off-site treatment facility or submit documentation assigning waste items to applicable treatability groups or complete parallel option," for waste in Treatability Group, "Mercury Wastes - TBD," MWIR Waste ID LA-W925-4, LA-W925-5, and LA-W925-6 by the Compliance Date of 12/20/03.



NMED previously approved a one-year extension for two of these milestones in STP Revision 11.0. The extensions were requested to allow time for commercial facilities to develop the capabilities for treating this type of mixed low level waste. Unfortunately, no commercial facilities are available as of this date. For this reason, DOE and UC are requesting that two of the Milestone Activity Dates, 11/15/01 and 12/20/01, be extended to be consistent with the 12/20/03 Milestone Activity Date for mercury waste. This request will be formally proposed in the next Annual Revision (12) to the STP due to NMED in March 2002. Upon NMED approval, the Milestone Activity Dates for all mercury waste in LA-W920 and LA-W925 will be "12/20/03".

DOE and UC plan also to propose, in the next Annual Revision, the addition of 3 items of mercury debris that were returned from a treatability study. The total volume of this waste is 0.05 cubic meters. This waste will be proposed for addition to Treatability Group, "Mercury Wastes - TBD," MWIR Waste ID LA-W925.

Enclosed is a Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO. We are available to discuss this information with you at any time. Please contact me at (505) (505) 665-0714 if you have any questions.

Sincerely,



Beverly Martin
STP Project Manager
Environmental Science and Waste Technology
Los Alamos National Laboratory

Cy:

Mr. James Bearzi, Bureau Chief
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