



Waste Disposition Program
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Los Alamos, New Mexico 87545
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June 6, 2002
RRES/WD:02-021

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Carl Will
Permits Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park East, Bldg. 1
Santa Fe, New Mexico 87505

**SUBJECT: NOTICE OF COMPLETION OF ON-SITE WASTE RECYCLING/REUSE
ACTIVITIES 3.1.9 (B) and 3.1.11 (B) IN THE COMPLIANCE PLAN VOLUME
(CPV), SITE TREATMENT PLAN (STP), LOS ALAMOS NATIONAL
LABORATORY (LANL) Rev. 11.0**

Dear Mr. Will,

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of the completion of required activities set forth in the Federal Facility Compliance Order (FFCO). Activities 3.1.9(B) and 3.1.11 (B) in the CPV requires that *“(w)ithin 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option”* the Department of Energy (DOE) and the University of California(UC), *“(p)rovide documentation to NMED that waste was received at off-site facility or provide notification of parallel option.”* This notification is required by Section XX of the October 4, 1995 FFCO.

Part of the STP inventory includes aerosol cans, specifically LA-W907, LA-W908, and LA-W918. LANL made the decision to pursue an on-site recycling operation as a parallel preferred option. This letter is notification that this parallel option has been completed for 0.74 m³ of the inventory.

To empty the cans, LANL used a commercially-available can puncturing system equipped with a carbon filter for absorbing any organic vapors. Therefore, after using the can puncture system, the STP volume for 0.74 m³ of LA-W907, LA-W908, and LA-W918 has been re-cycled and will be deleted from the STP inventory. LANL will update the STP volumes for LA-W907, LA-W908, and LA-W918 in the next STP update, Rev 13.0, due on or before March 31, 2003, in accordance with the FFCO Section VII.

In accordance with 40 CFR 261.6(a)(3), aerosol cans destined for scrap metal recycling are not subject to regulation or notification requirements under the Resource Conservation and Recovery Act (RCRA).



Because the cans are predominantly steel (as opposed to non-ferrous metals such as aluminum), they are very amenable to recycling. The cans were shipped to a licensed Duratek facility in Bear Creek, Tennessee. The cans will be recycled using a metal melt system that takes in contaminated (radiologically) steel, melts it, pours it into molds, and makes steel shield blocks for use in the DOE Complex. The small amount of liquid drained from the cans during the puncturing process, has been managed appropriately as newly generated RCRA waste.

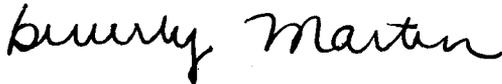
The table below provides the original STP volumes that have been re-cycled.

STP Section	MWIR Waste ID	Treatability Group	STP Volume (m ³)
3.1.9	LA-W918	<i>Compressed gases requiring oxidation</i>	0.53
3.1.11	LA-W907	<i>Halogenated organic liquids</i>	0.20
3.1.11	LA-W908	<i>Non-halogenated organic liquids</i>	0.0028
TOTAL			0.74

Documentation that waste was received at the Duratek Facility is provided in Enclosure A. Also included as Enclosure B is a Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO.

Please contact Dianne Williams Wilburn, dwwilburn@lanl.gov, 505-667-6952 if you have any questions.

Sincerely,



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

Enclosures: a/s

Cy (w/encl.):

Mr. James Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park East, Bldg. 1
Santa Fe, New Mexico 87505

**ENCLOSURE B
CERTIFICATION**

**NOTICE OF COMPLETION OF OFFSITE WASTE SHIPMENT
ACTIVITY 3.1.9 (B) and 3.1.11 (B)
SITE TREATMENT PLAN (STP)
LOS ALAMOS NATIONAL LABORATORY (LANL)**

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.

Beverly Martin

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

6/11/02

Date Signed

James Nunz
Waste Management Program Manager
Office of Los Alamos Site Operations
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

Date Signed