



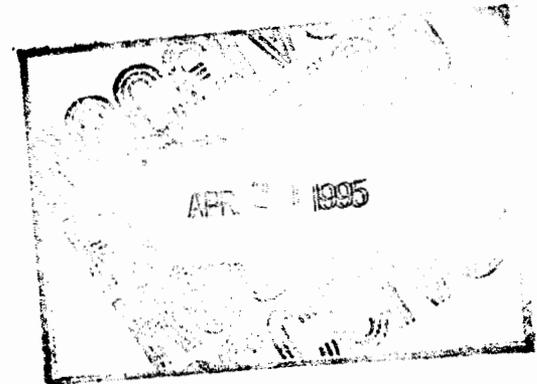
TA-72  
OU-1100

**Department of Energy**  
Field Office, Albuquerque  
Los Alamos Area Office  
Los Alamos, New Mexico 87544  
**APR 18 1995**

*Barbara*  
*need to discuss*  
*points*

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia  
Hazardous and Radioactive Materials  
Bureau  
New Mexico Environment Department  
525 Camino de los Marquez  
P. O. Box 26110  
Santa Fe, New Mexico 87502



Dear Mr. Garcia:

The Department of Energy (DOE) and the University of California (UC), as maintenance and operations contractor for Los Alamos National Laboratory (LANL), request your approval to move soil containing lead bullets to a firing range for reuse in backstop construction. The specifics of this issue are outlined below.

The Environmental Restoration (ER) Project has been conducting a soil washing operation near the Guaje Pines Cemetery at the Inactive Firing Range as part of a voluntary corrective action LANL instituted in the fall of 1993. The Solid Waste Management Unit (SWMU) undergoing remediation is SWMU 0-016, an Inactive Firing Range. The remediation activity selected, a soil washing operation, removes lead from the soil and the lead then is recycled.

The operation was intended to be completed in the fall of 1994. However, additional soil containing lead was found, increasing the total amount of soil to be processed. The operation was also slowed during the winter by freezing temperatures, rendering the operation ineffective. Therefore, there are approximately 5000 cubic yards of soil containing lead currently stockpiled at the site awaiting processing through the soil washing operation. Unless an alternate solution can be implemented, LANL intends to process the remaining soil beginning in April 1995, and has a contract in place to do so.

During March 1995, TA-72 submitted a request for soil for the construction of new firing range backstops and a request for soil to add to existing backstops at an active firing range, which was brought to the attention of the ER Project. The backstops are used to stop bullets during the weapons firing practice. During normal use of the firing range, lead bullets are discharged into the backstops and remain there. This is the same activity that resulted in the deposition of lead bullets in the soil at the Inactive Firing Site.

A "common sense" approach has resulted from these two seemingly unrelated issues: reuse of the soil with lead bullets from the Inactive Firing Range soil washing operation to the TA-72 firing range. Such reuse means continued use of the soil at a firing range. The TA-72 firing range is an



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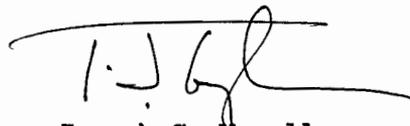
active site and the soil comprising the backstops will continue to receive lead bullets as weapons are discharged during weapons firing practice. Processing of the remaining soil at the Inactive Firing Site to remove lead is estimated to cost \$500,000. The lead removed from the soil would then be sent off for recycling. LANL proposes that the Inactive Firing Range soil with lead bullets be transported to the TA-72 firing range where it will function as effectively as clean soil (i.e., commercial product). The benefits of taking the soil from the Inactive Firing Range for continued use at the firing range are: it decreases the total amount of soil that will eventually have to be processed to remove lead; no contamination of clean additional backstop material will occur; the lead-containing soil is removed from its current offsite location and brought under LANL control; the funds which would have been used to conduct soil washing can be utilized at other ER Projects; and, negative environmental impacts will not occur.

The soil from the Inactive Firing Range contains lead bullets and is a characteristic hazardous waste due to lead (D008). Lead is a recyclable material which meets the definition of scrap metal. Based on the regulations at 20 NMAC 4.1 Section 261.6(a)(3)(iii), scrap metal is defined as a hazardous waste. However, scrap metal is not subject to 20 NMAC 4.1 Sections 262 through 266 or Parts 268, 270, or 124. We request confirmation that the lead and the soil containing lead constitute a recyclable material as provided at 20 NMAC 4.1 Section 261.6(a)(3)(iii).

LANL will manage the soil at TA-72 Firing Range as all backstop material is managed. This firing range is identified by the ER Project as SWMU 72-001. During the summer field season of 1995, surface samples will be collected in the Firing Range drainage areas. The samples will be analyzed for total metals. The sampling is being conducted to support the ER Project's recommendation that any corrective action at the SWMU should be deferred until the Firing Range is no longer needed and the site is decommissioned. At that time, LANL will clean up the Firing Range to the environmental cleanup standards required at that time. LANL does not anticipate closure of the Firing Range within the next 20 years.

I look forward to receiving a reply to this request for your interpretation at your earliest opportunity.

Sincerely,



Joseph C. Vozella  
Assistant Area Manager  
Office of Environment and  
Projects

LAAMEP:9BK-007

Enclosure

cc:

See page 3

Mr. Benito Garcia

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cc w/enclosure:

B. Driscoll

RCRA Permits Branch

U. S. EPA Region 6

1445 Ross Ave., Suite 1200

Dallas, Texas 75202-2733

T. Taylor, AAMEP, LAAO

C. Fesmire, AAMEP, LAAO

B. Koch, AAMEP, LAAO

J. White, ESH-19, LANL, MS-K490

T. Baca, EM, LANL, MS-J591

J. Jansen, EM/ER, LANL, MS-M992

ESH-19, (95-0178), LANL, MS-K490

RPF, LANL, MS-M707

J. Levings, ERPO, AL

# LOS ALAMOS NATIONAL LABORATORY

## SERVICE REQUESTS Facilities Engineering Division

ENG File Code 7.23.1

SR Number **09-97**

CHECK APPLICABLE (\*Automatic Discretionary Overtime) ES&H Review Attached  Yes  No  
 Tier 1\*  Tier 2  Tier 3  Routine  Overtime Approved

Work Order Number		Work Order Type		Control CFT		As-Built? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Work Order Title <i>MODIFY BERM AT TA-72</i>							
Project ID <i>16528</i>			Special Category			Coordination Area <i>81</i>	
Task Code		Service Request Date <i>2/21/95</i>		Target Completion Date <i>1/1</i>		Author <i>H. Rice</i>	
Requesting Group <i>PTLD</i>			Equipment Class A or B		Equipment No. Plant or PN		Purchase Request or Order Number
Requester Name <i>STEVE RIVERA</i>			Equipment Class A or B		Equipment No. Plant or PN		Purchase Request or Order Number

LOCATION				APPROVALS (Initials)			
TA <i>72</i>	Building	Room	Grid	ENG Mechanical		Security	
TA	Building	Room	Grid	ENG Electrical		HS (Review)	
TA	Building	Room	Grid	EM&R Fire Protection		Other (Specify)	

Est. Type	SR ESTIMATE	SSS AUTH. TO SPEND	FY AUTH. TO SPEND	CRAFTS	HOURS
Labor	<i>3977</i>			Custodial CU	
Material	<i>33,292</i>			Electricians EL	
Equipment	<i>4752</i>			Laborers LA	
Sub-Contract & A	<i>10085</i>			Teamsters TE	
Other				Oper. Engrs. OE	
CONST TOTAL	<i>52,106</i>			Painters PA	
AE @ _____ %				Cement Masons CM	
Contingency	<i>5211</i>			Pipefitters PF	
TOTAL	<i>57,317</i>			Carpenters CP	
				Roofers RF	
				Insulators IN	
				Ironworkers IR	
				Sheetmetal SH	
				Mechanics MC	
				Supervision SU	
				Engineering EN	

FINANCIAL ACCOUNT	COST CENTER	PROGRAM CODE	COST ACCOUNT	WORK PACKAGE	VOUCHER ID	SPLIT PERCENT

**Brief Work Scope**  
*MODIFY EXISTING BERM AT RANGE #4. INSTALL NEW BERM BETWEEN RANGES 3 & 4 AND NEW BERM FROM RANGE #4 APPROX 100 YDS TOWARD RANGE #4 CANOPY.*

Engineering Approval	Date	Group Leader	Date	Division Leader	Date
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(COPIES TO)

Name	Mail Stop
Name	Mail Stop

Name	Mail Stop
Name	Mail Stop

Attachments  
BERM SKETCH

Text Description  
 FURNISH LABOR, EQUIPMENT & MATERIALS TO RAISE HEIGHT OF BERM AT RANGE #4 BY 15 FT. CREATE A NEW BERM CONNECTING THE BERMS FROM RANGE #3 TO RANGE #4. CREATE A NEW BERM APPROXIMATELY 30 FT. HIGH FROM RANGE #4 FOR APPROXIMATELY 300 FT. TOWARDS THE RANGE #4 CANOPY. INSTALL APPROXIMATELY 100 FT OF "JERSEY BOUNCES" IN FRONT OF RANGE #4 TO PREVENT STREAM EROSION. APPROXIMATELY 60 FT. OF JERSEY BOUNCES WILL BE SET IN TRENCH WITH APPROX 6" OF TOP PROTRUDING ABOVE EXISTING GRADE.

SWOT WORKSHEET  
# 16528

MAINTENANCE CRAFTS	LOADED RATES	HOURS	TOTAL
Laborers	\$23.71		
Teamsters	\$25.17		
Operating Engineers	\$35.26		
Painters	\$33.38		
Cement Mason	\$29.76		
Electrician	\$42.42		
Pipefitter	\$43.26		
Carpenter	\$41.73		
Roofer	\$28.09		
Insulator	\$39.57		
Ironworker	\$45.90		
Sheetmetal Worker	\$43.69		
Floor Crew	\$33.38		
Oper Engr/Transport	\$35.26		
Custodial	\$19.82		
Electrical/Relamp	\$25.59		

SUMMARY

39.10% Labor Loaded	3977.00
Material	<del>2888.20</del>
16.00% Material Load	28,700.00
Equipment	4592.00
Sub Contract	4752.00
Sub Contract Load	
Sub Total	42,029.00
24.00% G&A GRT	10,085.00
Installed Cost	52,106.00
10% Contingency	5211
TOTAL	57,317

57,317.00

DAVIS BACON CRAFTS	LOADED RATE	HOURS	TOTAL
Laborers	\$19.82	16	317.32
Teamsters	\$22.74	32	727.68
Operating Engineers	\$25.38	104	1629.72
Painters	\$27.82		
Cement Mason	\$25.38		
Electrician	\$45.90		
Pipefitter	\$47.71		
Carpenter	\$38.75		
Roofer	\$19.61		
Insulator	\$46.32		
Ironworker	\$27.05		
Sheetmetal Worker	\$43.39		
Floor Crew	\$27.82		

MATERIAL	
10 EA Jersey Bouncers	2500.00
1310 Cu Gas Base	
Couner @ 20.00	26,200.00
NOTE: COORDINATE W/ LEAD FREE DIRT FROM GUAR PINES CLEAN UP. COULD BE USED @ TA 72	
COORDINATE W/ MARK BUELL 667-3352 E.A. SANDERSON	
TOTAL:	667-8178 28,700.00

112. 2669.00

OVERHEAD	LOADED RATE	HOURS	TOTAL
Planner	\$31.32		
Surveyors	\$22.88	4	91.52
Supervisor	\$35.39	16	566.24
Material Coordinator	\$21.90	2	43.80
Scheduler	\$23.11	2	46.22
Safety Engineer	\$31.92	4	127.68
JENV	\$35.75	4	143.00
CPS	\$36.24	8	289.92
Material Testing	\$27.56		
Engineering Design	\$36.60		

1302.00

EQUIPMENT	RATE	TOTAL
Dump Truck	32 \$38.50	1232.00
Mobil Cranes	\$60.00	
Forklifts	\$25.00	
Backhoes	\$35.00	
Loader, 2CU YDS	56 \$50.00	2800.00
Bulldozer	8 \$90.00	720.00
Trencher	\$50.00	
Stake Bed Truck	\$35.00	
Compaction Equip.	\$25.20	
Loader, 1/3 CU YD	\$26.00	

4752.00



2/22/95

P.I.D. # 116528

PP 2-18-5

Modify Beams @ TA 72.

Pistol Range

SR# 0987

ATTENDED SWOT 2/21/95 to  
Modify Beams, AS PER ATTACHED SKETCH.  
w/ REQUESTER - STEVE RIVERA, 716427. &  
HOWARD RICE 7-9947 FOR COST ESTIMATE.  
IN ORDER TO MEET REQUIREMENTS  
MINIMAL ESTIMATE OF CUBIC YARDS OF DIET  
REQUIRED 1300-2000 CYD.

USING BASE COURSE @ 20" CYD. MATERIAL  
COSTS WILL RUN APPROX \$26,000<sup>00</sup> - \$40,000<sup>00</sup>.

I HAVE RECOMMENDED TO STEVE RIVERA  
& HOWARD RICE, TO SPEAK TO HENRY DUNEZ  
WHICH I HAVE ALREADY DONE, SO, I TO SEE  
IF WE CAN TRANSPORT THE REQUIRED DIET  
FROM THE OLD GAUGE PILES PISTOL RANGE,  
WHICH WILL BE IN FULL OPERATION APRIL  
1ST 1995.

AT PRESENT WE ARE PAYING AN OUTSIDE  
SOURCE TO TRANSPORT ALL RECYCLED DIET,  
TO RIO RANCHO AREA.

AT PRESENT WE HAVE ALL DIET THE  
PISTOL RANGE @ TA 72 WILL TURN OVER.

PLUS A DOUBLE COST SAVING TO THE  
LABORATORY AND WE AS TAXPAYERS.

MR. HENRY DUNEZ WILL TRY TO MAKE THE  
NEEDED REQUIREMENTS w/ DOE. #

THAT OF 1021 7-217

