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United States Government

Department of Energy

# memorandum

Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

DATE: MAY 25 1995

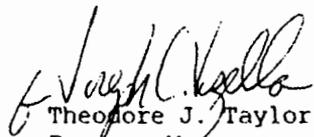
REPLY TO:  
ATTN OF: LAAMEP:5BK-010  
SUBJECT: NMED HRMB Request for Information Prior to Decision Concerning  
SWMU 0-016: Movement of Lead Contaminated Soil to TA-72

TO: Jorg Jansen, Program Manager, EM/ER, LANL, MS-M992

Attached is a letter from NMED HRMB indicating willingness to authorize a proposal from Joseph Vozella, dated April 18, 1995, to move lead contaminated soil from SWMU 0-016 to TA-72, provided additional information is submitted. The letter from Benito Garcia, dated May 17, 1995, requests that five items of information be submitted to Barbara Hoditschek as soon as possible. Please ask your staff to prepare a draft response to this request for DOE review by June 7.

Although NMED has not specified that management of the berm material from SWMU 0-016 at TA-72 should include periodic removal of bullets for recycling by sifting, DOE recommends that such processing be considered. Such an approach to management of lead would demonstrate to the State a proactive effort towards waste minimization and control of lead contaminated soil.

If you have any questions regarding this matter, please call me at 665-7203, or Bonnie Koch of my staff at 665-7202.



Theodore J. Taylor  
Program Manager  
Environmental Restoration  
Program

Attachment

cc:  
See page 2

Processed by CH 100  
Mar 30 1995  
M



Jorg Jansen

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MAY 25 1995

cc w/attachment:

E. Merrill, EM-452, HQ  
T. Taylor, AAMEP, LAAO  
J. Mack, AAMEP, LAAO  
C. Fesmire, AAMEP, LAAO  
J. White, ESH-18, LANL, MS-K497  
D. McInroy, EM/ER, LANL, MS-M992  
RPF, LANL, MS-M707  
D. Griswold, ERD, AL  
T. Sena, EPD, AL

cc w/o attachment:

W. Spurgeon, EM-452, HQ  
J. Vozella, AAMEP, LAAO  
J. Plum, AAMEP, LAAO  
J. Nunz, AAMEP, LAAO  
B. Koch, AAMEP, LAAO  
T. Baca, EM, LANL, MS-J591  
C. Newton, CST-18, LANL, MS-E525  
G. Rael, ERD, AL



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
525 Camino De Los Marquez  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-4358  
Fax (505) 827-4389

MARK E. WEIDLER  
SECRETARY  
EDGAR T. THORNTON, III  
DEPUTY SECRETARY

May 17, 1995

Mr. Larry Kirkman  
DOE/LAAO  
528 35th Street  
Los Alamos, New Mexico 87545

Dear Mr. Kirkman:

The New Mexico Environment Department (NMED) has received Los Alamos National Laboratory's (LANL) proposal to remove lead (in the form of spent projectiles) contaminated soil from Solid Waste Management Unit (SWMU) 0-016 (an inactive firing range undergoing Voluntary Corrective Action (VCA)) to an active firing range (SWMU 72-001) located at TA-72, as berm/backstop material. This proposal, as NMED understands it, would be in lieu of utilizing clean soil for the same use.

NMED concurs with LANL that the use of this lead contaminated material for the same purpose that it has previously been used for in the past prior to cleaning the soil for non-RCRA regulated use makes sense.

NMED is willing to authorize the use of this lead contaminated material as a beneficial product (berm/backstop material) at SWMU 72-001, TA-72, if LANL provides information to the conditions listed below. Please provide the requested information to Ms. Barbara Hoditschek as soon as possible to allow for an expedited decision.

1. The soil in question be verified as being free of any other regulated RCRA constituents.
2. Specific conditions under which the active firing range at SWMU 72-001, TA-72, would no longer be considered an active firing site. For example, define normal use criteria for the firing range and a minimum use below which LANL would close the firing range and proceed to remediate the lead soil.
3. Certification that the active firing range at SWMU 72-001, TA-72, is being utilized for the intended purpose and not just being used as a convenient storage



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Mr. Larry Kirkman  
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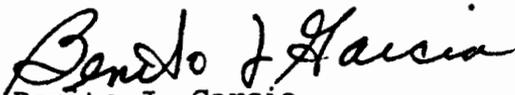
facility for contaminated soil.

4. Yearly status report on SWMU 72-001, TA-72, activities and the status of the lead-soil berms
5. Specifics of SWMU 72-001, TA-72, berm/backstop material management which assures that no migration of the contaminant will occur. This should include any sampling methodologies for lead and/or total metals at the site to support the proposed deferred corrective action on the lead-soil.

NMED believes that this decision represents a common sense approach which maximizes the taxpayer's dollar in meeting the requirements of the regulations, and is in the best interest of the general public, the regulated entity, and the regulatory agencies.

Should you wish to discuss this issue further, please contact me at (505)827-4358 or Ms. Barbara Hoditschek at (505) 827-4308.

Sincerely,



Benito J. Garcia  
Bureau Chief  
Hazardous and Radioactive Materials Bureau

CC: E. Kelley, Ph.D., Director, WWMD  
B. Hoditschek, HRMB  
S. Dinwiddie, HRMB  
R. Kern, HRMB  
B. Driscoll, U.S. EPA  
J. C. Vozella, AAMEP, LAAO  
T. Taylor, AAMEP, LAAO  
C. Fesmire, AAMEP, LAAO  
B. Koch, AAMEP, LAAO  
J. White, ESH-19  
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