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GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

February 9, 1996

H.L. Plum
Office of Management and
Projects
Los Alamos Area Office
Los Alamos, NM 87544

Micheline Devaurs
Project Manager
EM Division
Los Alamos National Laboratory
Los Alamos, NM 87544

Dear Mr. Plum and Ms. Devaurs:

The Hazardous and Radioactive Materials Bureau (HRMB) has received your letter dated January 12, 1996 regarding "Recharacterization of Wastewater Treatment Sludge in Storage at Technical Area (TA) 54 - Request for Removal from Federal Facility Compliance Order (FFCO)". After studying your proposal to delete 1,228 drums of sludge currently being stored as Low Level Mixed Waste (LLMW) from the Federal Facility Compliance Order (FFCO), the HRMB requests more information before reaching a conclusion.

The analytical data presented in Attachment C is unclear as it does not seem to correspond with the narrative statements in Section 4.4 Characteristic Waste regarding whether the samples were pulled from the influent wastewater or from the sludges prior to containerization. Please confirm whether or not sludges were sampled and submit twenty (20) randomly selected lab sheets, corresponding QA/QC information and the general waste analysis protocol used in the sludge sampling activities. Please provide information/data which links the sludges sampled to the actual drums of sludge that you propose for deletion under the FFCO.

Additionally, HRMB requests more detailed information from Table 1. It is unclear as to whether the "Sample results from the radioactive low level wastewater treatment facility's vacuum sludge" are the same as those listed in Attachment C. Also, please provide the results of the "Parsons Company investigation" referenced in Table 1. This may help clarify the procedure that was used to "investigate options and recommend a final disposition of the TA 50-1 sludge drums".

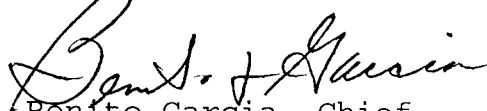


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Should you require more specific information regarding this request, please do not hesitate to contact me at 505-827-1557.

Sincerely,

A handwritten signature in cursive script, appearing to read "Benito Garcia".

Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department

xc: S. McMichael
J. Seubert
file