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July 15, 1996

H. L. Plum  
STP Project Manager  
Department of Energy  
Office of Environment  
and Projects  
Los Alamos Area Office  
Los Alamos, NM 87544

Micheline Devaurs  
STP Project Manager  
Los Alamos National Laboratory  
Los Alamos, NM 87445

Dear Mr. Plum and Ms. Devaurs:

The purpose of this letter is to document issues pending in relation to the Federal Facilities Compliance Order (FFCO), issued by New Mexico Environment Department (NMED) and the Respondents (the Department of Energy [DOE] and the Regents of the University of California [UC]).

The specific subjects addressed are listed below.

- 1) The Annual Site Treatment Plan Update to the Compliance Plan Volume (CPV) and Background Volume for Fiscal Year 1995 was submitted March 31, 1996 to NMED. Upon review of the document, NMED requested supplemental information in reference to **Section 2.1.1 LLMW Inventory Summary**, Page 19 of the Background Volume Update, and **Table 2-1, FY95 LLMW Inventory Update Summary**. Per discussions between NMED and Respondents at a meeting at LANL (TA-54), May 22, 1996, it was agreed that an addendum would be attached for the section which would give a clearer picture of the reason for the inventory changes reflected in Table 2-1; especially those line items under "CPV Section(s) 3.1.5, 3.4.1, 3.4.2, and none". Inclusion of the information directly into the document maintains the administrative record in a unique place. In addition, a slight modification would be made to Table 2-1 to indicate Background Volume Specified Treatability Groups in addition to the listed "CPV Section" Treatability Groups. NMED is anticipating receipt of these modifications.

Because inventory increased under some categories which is reflected in the update, a revision to the Compliance Plan Volume is necessary. Under Section "X. Revisions" of the FFCO Order per Section B.4., "(a revision is) an increase in volume in a treatability group in the STP".



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Mr. Plum/Ms. Devaurs  
Page 2  
July 15, 1996

- 2) NMED has reviewed the letters submitted by Respondents concerning the re-characterization of wastewater treatment sludge collected from June 1988 through November 1993 currently in storage at Technical Area (TA) 54. Much discussion has occurred in regards to this subject and NMED acknowledges the time and effort DOE and LANL have expended in gathering and explaining data. Most recently (July 25, 1996) NMED has requested more data in relation to the organics that may have been processed through the Radioactive Liquid Waste Water Treatment Facility during and succeeding the time period when the sludges were accumulated.
- 3) DOE had informally approached NMED pertaining to a possible change to allow for off-site treatment of items currently categorized under Section 3.4.2 Sorting, Surveying, and Decontamination of Exhibit A, the LANL Mixed Waste Site Treatment Plan (STP), Compliance Plan Volume (CPV), Background Volume. NMED responded that the change would be categorized as a revision to the STP/CPV under the premise that items would be transferred to other treatability groups then shipped off-site for treatment. Because there would be a deletion of a treatability category, an increase in the volumes in the other treatability groups, and a potential change to a compliance date (of more than 90 days), a revision is required per the FFC Order, Section "X. Revisions" for any of these changes. The Compliance Date for the survey completion of 14.24 cubic meters, the volume in this treatability category, is October 30, 1996. By this date, the treatment activities must be complete for the designated volume or a revision to the STP/CPV must be approved by NMED and in place by this date.

Should you have questions on these or other issues related to the FFCO, or STP/CPV, please contact me at (505) 827-1558.

Sincerely,



Janice Archuleta  
FFCO Project Manager

JA/dpb

cc: Benito J. Garcia, Chief  
Susan McMichael, OGC