

# MEMO

**To:** Ms. Janice Archuleta  
**From:** *BJG* BENITO J. GARCIA  
**Subject:** Comments on LANL Treatability Study Relative to FFCO Requirements  
**Date:** August 9, 1996

I believe that no revision to the FFCO/CPV is needed for the proposed study based on the following statements:

1. The waste has been generated within less than a one year time frame and therefor not subject to the FFCO as a covered waste;
2. The waste as collected and utilized for the treatability study is exempt from other RCRA requirements except for those applicable to treatability study wastes;
3. The wastes will be transported off-site for the treatability studies therefor only the sample collection and transport requirements apply;
4. None of the criteria for revision to the CPV as stipulated in the FFCO are triggered by this proposed study;

CONCLUSION : IF ANY CHANGE TO THE CPV IS NEEDED IT WOULD BE A MINOR CHANGE. PREFERABLY THE BACKGROUND VOLUME OF THE STP SHOULD BE UTILIZED TO REPORT ON THE STUDY AND THE ACTIONS TAKEN TO MEET ALL APPLICABLE REQUIREMENTS FOR THE STUDY THROUGH THE RCRA PERMITS MANAGEMENT PROGRAM.



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*Rec'd LANL FFCO/96*

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