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Red HANK
FFCO/96

November 20, 1996

H. L. Plum
STP Project Manager
Office of Environments and Projects
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, NM 87544

Kenneth Hargis
STP Project Manager
Los Alamos National Laboratory
Los Alamos, NM 87445

Not correct
Section 3.1.2 barrel

RE: Los Alamos National Laboratory (LANL) TA-50-1 Wastewater Treatment Sludge
Reclassification

Dear Mr. Plum and Mr. Hargis:

Department of Energy (DOE) and University of California at Los Alamos National Laboratory (UC/LANL) submitted a letter to New Mexico Environment Department (NMED), dated October 18, 1996. This letter addressed a treatability group in Section 3.1.2 (titled Off-site Treatment by Stabilization or Macroencapsulation) of the Site Treatment Plan Compliance Plan Volume (STP/CPV) of the Federal Facilities Compliance Order (FFCO) October 4, 1995. From Section 3.1.2, the specific treatability group in the letter was "soil with heavy metals". Of the 59 items or drums, a total of 47 drums have been recharacterized and DOE and UC/LANL determined that they should be no longer considered as Low-Level Mixed Waste, but only as Low-Level Radioactive Waste.

Of the 47 drums being considered to be reclassified only seven drum samples have been taken. The volume of the seven samples is but a fraction of the total volume of those seven drums, which is a very small percentage of the entire volume of waste to be considered reclassified. Other considerations for discussion are the fact that of the 47 drums to be reclassified, the soil came from two different sites, with original designations of three different types of contamination. Prior to possible acceptance of the reclassification proposal, more information must be submitted regarding the samples. Below are listed some questions which should be answered:

- Are the samples from the drums representative of the entire drum, e.g., is it a homogeneous sample? If so, how was this obtained?
- Are the samples from the drums sampled representative of the entire group or a subset of drums to be recharacterized?



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- Is there sampling data from the sites where the soil was originally which can be used to support the laboratory analysis of the samples from the drums? Is there previous data which supports or contradicts laboratory sampling from the drums?
- What methods or protocols were followed to arrive at a drum sampling number? (This information should be submitted with the request or referenced and made available for review by NMED.)

Please provide more information for the reclassification of these drums categorized as "soils with heavy metals". The submittal of information to include only seven laboratory samples, is insufficient for Hazardous and Radioactive Materials Bureau (HRMB) to determine reclassification of the presently considered mixed waste in the 47 drums. However, it is possible that more information exists for these drums because they were generated from an environmental remediation project. Other additional information relating to the drums other than those specifically addressed above which would provide an argument for sample representability and acceptability should be provided to HRMB.

If there are any questions concerning this or other FFCO matters, please call me at (505) 827-1558.

Sincerely,


Janice Archuleta

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cc: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau
Stu Dinwiddie, Program Manager, RCRA Permits Management
Susan McMichael, OGC