



Department of Energy

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

NOV 21 1996



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Janice Archuleta
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

Dear Ms. Archuleta:

Subject: Revision No. 3.0 to Site Treatment Plan (STP), Sort, Survey and
Decontamination (SSD) Activities, Los Alamos National Laboratory (LANL)
Federal Facility Compliance Order (FFCO), October 4, 1995

The purpose of this letter is to respond to the New Mexico Environment Department's (NMED) October 30, 1996 letter regarding our request for revision no. 3 of the STP. This document was drafted in accordance with the requirements of Section X.C.2, "Revisions," and Section XI, "Other Amendments to the STP," of the FFCO.

As requested in your letter of October 30, 1996, and discussed during our meeting on November 15, 1996, we are hereby proposing the following changes to the revision request we presented in our October 21, 1996 letter:

- We concur that this request is being made for revision no. 3.0 (not revision no. 2.0) to the LANL STP.
- We concur with your change to our previous proposal to revise the Compliance Plan Volume (CPV) language in Section 3.4.2 to include the additional language you requested regarding off-site treatment.
- We further request that our October 21, 1996 revision proposal be modified to clarify that during the course of the RCRA sampling and visual verification of the Group 2 and 3 wastes, respectively, some items ultimately may shift from Group 2 to Group 3 and vice versa.

The third proposed change above is based on our realization that we failed to explicitly discuss this issue in our October 21, 1996 letter. Based on our current information, we



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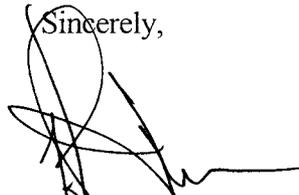
Red LANL FFCO/96

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expect to be able to sample the 162 items in Group 2; however, these items have not yet been verified visually. We may find at the time we sample a given drum that some of these items (e.g., solid small volume waste items that cannot be sampled in accordance with EPA SW-846 methods) are in fact not amenable to sampling and should have been included in the item count for Group 3, and vice versa. Suggested clarifying text is proposed in redline/strikeout format in Enclosure A to this letter.

A Certification statement is provided as Enclosure B. LANL's records and documents related to these requests are available to NMED's staff on request. If you have any questions, please contact me at (505) 665-5042; or Ken Hargis, LANL, at (505) 667-2347.

Sincerely,



H. L. "Jody" Plum
Office of Environment and Projects

LAAMEP:7HJP-045

Enclosures

cc w/enclosures:

Mr. Benito Garcia

Hazardous and Radioactive Materials Bureau

New Mexico Environment Department

2044 Galisteo St., Bldg. A

P. O. Box 26110

Santa Fe, NM 87505

ENCLOSURE A

PROPOSED CPV REVISION 3.0 TEXT

[NOTE TO REVIEWERS: New language to be inserted is in italics; modified text (new from October 21 version) is underlined; language to be deleted from current CPV is given in ~~strikeout text.~~]

3.4.2 Sorting, Surveying, and Decontamination (MWIR Treatment ID GJ-S804)

Treatability Group(s):

Treatability group	MWIR waste ID	Number of items	Net volume (m3)
1. nonradioactive or suspect waste items to be surveyed	LA-W929	1049	10.58
2. <i>nonradioactive or suspect waste items to receive RCRA and radiological characterization</i>	<i>LA-W929</i>	162	3.25
3. <i>nonradioactive or suspect waste items that cannot or should not be sampled</i>	<i>LA-W929</i>	39	0.41
Totals		1250	14.24

Treatment Technology:

The waste items in part 1 of this treatability group will be surveyed using a ~~This~~ field operation that will survey waste suspect of radioactive contamination to determine whether it is radioactively contaminated. The work will be done on-site with equipment and staffing provided by LANL or another DOE site. Waste determined not to be radioactively contaminated will be treated using commercial facilities permitted to treat hazardous waste; ~~waste determined to be radioactively contaminated will be assigned to applicable treatability groups and/or sent to off-site facilities for appropriate treatment.~~

Waste items in part 2 of this treatability group will be surveyed using complete RCRA and radiological sampling and characterization. Waste sampled under this alternative will be treated and disposed as low-level mixed waste; the waste will be assigned to applicable treatability groups and/or sent to off-site facilities for appropriate treatment based on the results of this characterization.

Sampling for this characterization alternative will be conducted in accordance with RCRA SW-846 methods. To ensure an adequate volume of waste material is available for sampling and to maximize the cost effectiveness of the sampling activities, some lab packed and other waste items may be bulked into larger volume containers; all RCRA waste codes will be transferred to the bulked wastes to ensure correct RCRA categorization is maintained. It may be found, when preparing a given drum for ~~sampling, that some items (for example, solid small volume waste items that cannot be~~

sampled in accordance with EPA SW-846 methods) are in fact not amenable to sampling and should have been included in the item count for Group 3. If visual inspection so indicates, these waste items will be transferred to Group 3 and assigned to applicable treatability groups based on existing knowledge.

Waste items in part 3 of this treatability group which are confirmed not amenable to sampling (e.g., lead-acid batteries, spray paint cans) will be assigned to applicable treatability groups based on existing knowledge. It may be found, when inspecting a given drum, that some items can in fact be sampled in accordance with EPA SW-846 methods and should have been included in the item count for Group 2. If visual inspection so indicates, these waste items will be transferred to Group 2 and sampled accordingly.

Additional compliance dates will be proposed for any waste items in this treatability group found not to have available treatment/disposal options following a complete review of all survey, analytical, or visual inspection data obtained through these processes.

For all waste items in this treatability group, shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within (45) working days of receipt of waste at the treatment facility.

Activities for waste items in part 1 of this treatability group.

<i>Activity</i>	<i>Compliance Dates</i>
<i>A. complete field survey</i>	<i>10/30/96</i>
<i>B. submit documentation declaring waste items as nonradioactive, or submit documentation assigning waste items to applicable treatability groups</i>	<i>2/28/97</i>
<i>C. propose additional compliance dates if necessary</i>	<i>4/30/97</i>

Activities for waste items in part 2 of this treatability group.

<i>Activity</i>	<i>Compliance Dates</i>
<i>D. complete RCRA and radiological sampling</i>	<i>1/28/97</i>
<i>E. submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates</i>	<i>2/28/97</i>
<i>F. propose additional compliance dates if necessary</i>	<i>4/30/97</i>

Activities for waste items in part 3 of this treatability group.

<i>Activity</i>	<i>Compliance Dates</i>
<i>G. complete visual verification</i>	<i>1/28/97</i>
<i>H. submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates</i>	<i>6/30/97</i>
<i>I. propose additional compliance dates if necessary</i>	<i>9/30/97</i>

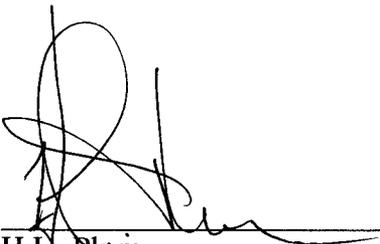
CERTIFICATION

I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



Kenneth M. Hargis
Environmental Management
Waste Management Program
Manager of Operations
Los Alamos National Laboratory

11/19/96
Date Signed



H.L. Ham
Regulatory Permitting and Compliance Manager
Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

11/20/96
Date Signed

**STP/CPV
PROPOSED REVISION 3.0 TEXT to FFCO**

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Activities for waste items in part 2 of this treatability group.

<i>Activity</i>	<i>Compliance Dates</i>
<i>D. complete RCRA and radiological sampling</i>	<i>1/28/97</i>
<i>E. submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates</i>	<i>2/28/97</i>
<i>F. propose additional compliance dates if necessary</i>	<i>4/30/97</i>

Activities for waste items in part 3 of this treatability group.

<i>Activity</i>	<i>Compliance Dates</i>
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<i>I. propose additional compliance dates if necessary</i>	<i>9/30/97</i>

Public Notice

On October 4, 1995, the New Mexico Environment Department (NMED) issued a Federal Facility Compliance Order (FFCO) requiring compliance by the United States Department of Energy (DOE) and Regents of the University of California (UC) with a Site Treatment Plan (STP) Compliance Plan Volume (CPV) for the treatment of mixed waste at the Los Alamos National Laboratory, New Mexico (LANL) pursuant to the New Mexico Hazardous Waste Act (HWA), NMSA 1978, §§ 74-4-1 et seq. (Repl. Pamph. 1993) and Section 3021(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6939 (c), as amended by the Federal Facility Compliance Act of 1992, Pub. L. 102-386, 106 Stat. 1505 (1992) (FFC Act). Under Section X. "Revisions" of the FFCO, all proposed or required revisions shall be available for public review and comment.

DOE and UC are proposing a revision to **Section 3.4.2 Sorting, Surveying, and Decontamination (MWIR Treatment ID GJ-S804)** of the STP/CPV. A copy of the proposed revisions will be made available for public review and written comment for thirty (30) days from the date of this publication at the following location:

Hazardous and Radioactive Materials Bureau
2044 Galisteo, Building A
Santa Fe, New Mexico 87505
Contact: Stella Montoya (505) 827-1558

Send written comments to:
Hazardous and Radioactive Materials Bureau
2044 Galisteo, Building A
P.O. Box 26110
Santa Fe, NM 87505
Contact: Janice Archuleta