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FFCO/96

December 4, 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

RE: Hazardous and Radioactive Materials Bureau Approval of Reclassification of TA-50-1 Waste Water Treatment Sludge

Dear Mr. Plum and Mr. Hargis:

The subject of Revision 2 to Federal Facilities Compliance Order [FFCO] October 4, 1995, Exhibit A, Site Treatment Plan Compliance Plan Volume (STP/CPV), initiated by New Mexico Environment Department (NMED), was reclassification of TA-50-1 Waste Water Treatment Sludge from a mixed waste to a low-level radioactive waste, and updating the associated item numbers and volumes with the reduction of the mixed waste. The purpose of the revision was to allow for the thirty day (30) public comment period required by the revision process. The thirty day comment period has ended and no public comments were received by the Hazardous and Radioactive Materials Bureau (HRMB). Revision 2 to the STP/CPV has been approved by HRMB and will be forwarded to Department of Energy (DOE) and University of California at Los Alamos National Laboratory (UC/LANL).

The revision was one of the steps in the process for the reclassification of the drums of sludge, listed in the STP/CPV under **Section 3.3 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done as dewatered treatment sludge (MWIR waste ID [identification]: LA-W928)**. Previous steps included the proper submittals by DOE and UC/LANL provided under **Section V.B. Other Matters Covered in this Order** (of the FFCO) in addition to other valuable information, (see October 7, 1996 letter from Janice Archuleta [NMED/HRMB] to H.L. Plum [DOE, Los Alamos Area Office] and Micheline Devaurs, [UC/LANL]).



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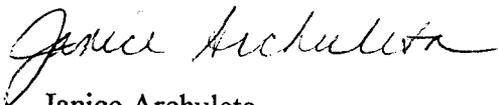
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In addition to the above, prior to allowing the reclassification of the sludges, the Respondents were to provide NMED/HRMB with information specifically addressing the net volumes of waste to be reclassified, final disposition of the waste, and a unique identification system and listing of **all** of the drums. This information was provided in the November 7, 1996 letter from H.L. Plum to Janice Archuleta. In this letter the corrected number, 1227 drums or items, with a volume of 255.46 m³ were identified for reclassification.

Per the provision under **V.B.** of the FFCO, NMED/HRMB hereby approves of the request for the 1227 items in **Section 3.3** of the FFCO identified as *dewatered treatment sludge* to be reclassified as low-level radioactive waste and no longer covered by the FFCO.

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