



Department of Energy
 Albuquerque Operations Office
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

*Physically
 received
 12/16/96*

DEC - 9 1996

Recd LANL FFCO/96

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Ms. Archuleta:

Subject: Notice of Completion of Activity 3.1.1A in the Site Treatment Plan (STP),
 Los Alamos National Laboratory (LANL)

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of completion of required activities set forth in the Federal Facility Compliance Order (FFCO), October 4, 1995. The STP Compliance Plan Volume (CPV), page 7, Activity 3.1.1A (as revised June 1996), requires that the Department of Energy (DOE) and the University of California (UC) "*Meet all regulatory requirements prior to shipping waste*" for shipments of STP-covered wastes scheduled for off-site thermal treatment, i.e., *IPA wastes* (MWIR waste ID no. LA-W901) and *scintillation fluids* (MWIR waste ID no. LA-W902), by September 30, 1996. This notification is required by Section XX of the October 4, 1995, FFCO issued to LANL.

This activity has been completed on a shipment-by-shipment basis prior to making each of the shipments from these treatability groups. To date, shipments of STP-covered waste from these treatability groups have been sent to Diversified Scientific Solutions, Inc. (DSSI) and the Waste Experimental Reduction Facility (WERF) at the Idaho National Engineering Laboratory (INEL). DOE and UC have identified the following regulatory requirements, as discussed below.

NMHW A Requirements

As required by the New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1, 40 CFR 262.11), the waste was characterized and determined to be hazardous (mixed) waste. As such, DOE and UC must ensure that (1) the waste is transported to a receiving facility by a transporter that has a transporter's EPA identification number; (2) the receiving facility has either a permit or interim status to manage the waste being received; and (3) a manifest and land disposal restrictions notification accompany each shipment. As indicated in the manifest copies submitted to you previously with our STP waste shipment notifications, DOE and UC have ensured that an approved, registered transporter is used for all shipments, and that the two receiving facilities used for these wastes indeed have EPA identification numbers.



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Ms. Janice Archuleta

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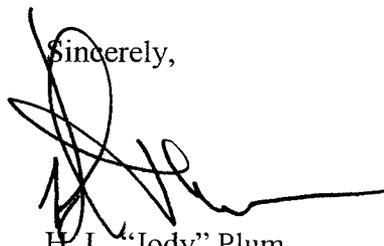
DSSI is a RCRA-permitted treatment facility, using a Boiler and Industrial Furnace process approved by the State of Tennessee. DSSI also holds a radioactive materials license issued by the Nuclear Regulatory Commission. In addition, they hold the following permits and approvals: Air Pollution Control, National Emissions Standards for Hazardous Air Pollutants, Small Power Reduction Facility (issued by the Federal Energy Regulatory Commission), and National Pollutant Discharge Elimination System discharge permits for effluent and stormwater runoff. The WERF is a RCRA interim status facility that includes both incineration and ash stabilization capabilities.

DOT Requirements

Prior to shipping, each shipment of waste is packaged in Department of Transportation (DOT) approved shipping containers. UC personnel label and mark all containers as required by DOT regulations. The shipping vehicles are placarded in accordance with 49 CFR Part 172 requirements. DOE and UC check each shipment prior to departure, and documentation of these checks is retained in the facility files, which include reviews of the manifests and radiological release documents; facility radiological manifests; DOE approval documentation; and quality assurance documents.

We apologize for the delay in transmitting this notification and hope it did not cause you any inconvenience. A Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO is enclosed herewith. We are available to discuss this information with you at any time. If you have any questions, please call me at (505) 665-5042 or Ken Hargis, LANL, at (505) 667-2347. Thank you again for the opportunity to provide this information.

Sincerely,



H. L. "Jody" Plum

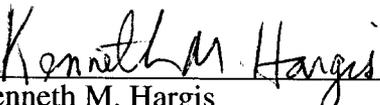
Office of Environment and Projects

LAAMEP:9JP-045

Enclosure

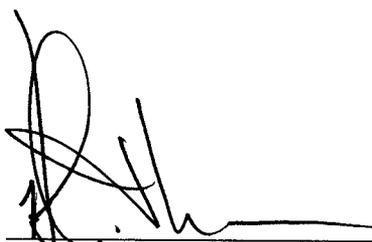
CERTIFICATION

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

11/26/96
Date Signed



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

12/9/96
Date Signed