



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

*submit
 proposal
 12/31/96*

DEC 24 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Rec'd LANL FFCO/96

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

Dear Ms. Archuleta:

Subject: Notice Regarding Permit Application Resubmittal, Activity 3.1.3A in the Site Treatment Plan (STP)

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of the status of required activities set forth in the Federal Facility Compliance Order (FFCO), October 4, 1995. The STP Compliance Plan Volume (CPV), Activity 3.1.3A (as revised June 1996), requires that the Department of Energy (DOE) and the University of California (UC) "*(S)ubmit permit application, amendment, or modification to NMED*" for the Evaporative Oxidation (EO) Skid by December 30, 1996. This notification is prepared to comply with the requirements of Section XX of the October 4, 1995 FFCO issued to Los Alamos National Laboratory (LANL).

The EO process was originally considered as the primary alternative to on-site incineration for treatment of the wastes in STP treatability group LA-W906, "*Aqueous organic liquids*," as discussed in Section 3.1.3 of the STP Background Volume (BV). This process combines evaporation and vapor catalytic oxidation to destroy volatile organic compounds and concentrate nonvolatile contaminants into a thick liquor or slurry. The aqueous waste is concentrated in an evaporator by boiling off most of the water and the volatile compounds. Air or oxygen is added to the vaporized fraction and forced through a catalyst bed where organic and inorganic compounds are oxidized.

The EO skid was planned to be constructed out of state and brought on-site for treatment of LANL's STP covered wastes. The BV stated that treatment skids such as the EO skid, if built, would be operated in the TA-63 Hazardous Waste Treatment Facility (HWTF). The HWTF was included in LANL's permit application submitted to NMED in September 1993 as a new facility planned for on-site treatment of STP covered wastes using a number of skid-mounted processes, possibly including EO. However, the decision was made not to construct the HWTF, and its permit application was formally withdrawn by letter dated August 7, 1996.

Demonstration of the EO process was completed in 1995, and DOE determined it would retain the EO process in its Albuquerque Operations Office *Mixed Waste Treatment Plan Evaluation and Identification of Treatment Options for Mobile Treatment Units*, which was completed in September 1995. Although DOE completed design of the EO skid,



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further development (including preparation of a unit-specific RCRA permit application) was not funded in FY 1997, and the skid has not been constructed, in part because DOE's evaluation identified that cost-effective commercial and DOE off-site treatment capacity for applicable waste streams existed and would be increasing in the near future.

As discussed in LANL's March 31, 1996 *Annual STP Update for Fiscal Year 1995*, DOE resources have been shifted away from treatment skid development to the preparation of wastes for shipment to commercial and noncommercial treatment and disposal facilities, including the wastes in STP treatability group LA-W906. Consequently, DOE and UC requested Revision 1.0 to the CPV (approved by NMED in June 1996) to designate off-site treatment as the parallel preferred option for most covered LLMWs in the CPV, including the wastes in STP treatability group LA-W906.

It is our understanding that since, at this time, DOE and UC intend to pursue the parallel option, approved for the LA-W906 wastes, of completing their shipment to commercial and/or noncommercial treatment and disposal facilities on or before the applicable compliance date of 02/09/00 (CPV Activity 3.1.3E), the specific requirement of Activity 3.1.3A for permit application submittal would not be considered applicable. Meanwhile, as specified in the Annual Update requirements in Section VII.B.2 of the FFCO, DOE and UC are continuing to evaluate both the potential future need for an EO treatment skid on-site, and the availability of off-site treatment capacity for this treatability group. The results of this evaluation will be reported to NMED in LANL's March 1997 *Annual STP Update for Fiscal Year 1996*. If our evaluation indicates that future development of the EO skid is to be either rescheduled or terminated, DOE and UC will propose corresponding revisions to CPV Activities 3.1.3A through 3.1.3D at that time.

A certification statement is enclosed. If you have any questions, please call me at (505) 665-5042, or Ken Hargis at (505) 667-2347. Thank you for the opportunity to provide this information.

Sincerely,



H. L. "Jody" Plum

Office of Environment and Projects

LAAMEP:3JP-028

Enclosure

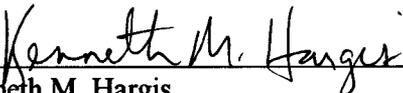
cc w/enclosure:

Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street, Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

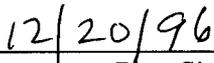
CERTIFICATION

**NOTICE REGARDING PERMIT APPLICATION RESUBMITTAL, ACTIVITY
3.1.3A IN THE SITE TREATMENT PLAN (STP)**

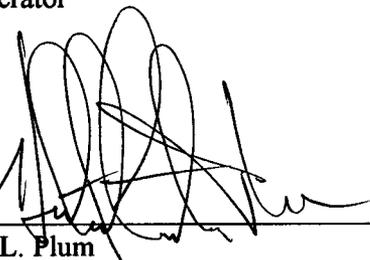
I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



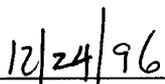
Kenneth M. Hargis
Manager of Operations
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator



Date Signed



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



Date Signed