

REDUCED FFCO/97



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ENTERED



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DEPUTY SECRETARY

January 27, 1997

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: Revision 3.0 to Federal Facilities Compliance Order, Exhibit A, Site Treatment Plan Compliance Plan Volume

Dear Mr. Plum and Mr. Hargis:

The thirty-day public notice period has ended for *proposed* Revision 3.0 to the Federal Facilities Compliance Order (FFCO) October 4, 1995, Exhibit A, Site Treatment Plan Compliance Plan Volume (STP/CPV), requested by Department of Energy (DOE) and University of California at Los Alamos National Laboratory (UC/LANL). New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB) received no public comments and has approved Revision 3.0 regarding CPV Section 3.4.2 *Sort, Survey, Decontamination, MWIR Treatment ID GJ-S804 (LA-929)*.

HRMB would like to point out several aspects concerning this revision that DOE and UC/LANL should realize. These are listed below.

- Under Activity B, E, and H in each table for the subgroup in this treatability group, it is stated that items may be moved to other treatability groups. Please be advised that an increase in a treatability group requires a revision per the FFCO as it presently is written;
- Under Activity C, F, and I in each table for the subgroup, it is stated that additional compliance dates may be proposed if necessary. This also requires a revision or an amendment per the FFCO;



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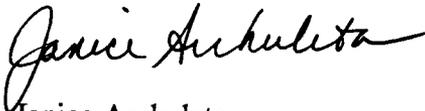
H. L. Plum  
K. M. Hargis  
January 24, 1996  
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- If a new treatment option (other than off-site shipment) is planned for the items remaining in this treatability group, a revision is required.

The finalized revision language (as presented to HRMB in the November 19, 1996 letter, to J. Archuleta [HRMB] from H. L. Plum [DOE]) is attached. An updated CPV shall be forwarded with the revision language in the near future.

If there are any questions concerning this or other FFCO matters, please call me at (505) 827-1867 or 827-1558.

Sincerely,



Janice Archuleta

ja

enclosure

cc: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau  
Stu Dinwiddie, Program Manager, RCRA Permits Management (without enclosure)  
Susan McMichael, OGC

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

[NOTE TO READERS: New language to be inserted is redlined; 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 (m <sup>3</sup> )
1. nonradioactive or suspect waste items to be surveyed	LA-W929	1049	10.58
2. nonradioactive or suspect waste items to receive RCRA and radiological characterization	LA-W929	162	3.25
3. nonradioactive or suspect waste items that cannot or should not be sampled	LA-W929	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 offsite 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, (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

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

Activities for waste items in part 2 of this treatability group

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



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

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