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MARK E. WEIDLER
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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 2.0 to Federal Facilities Compliance Order, October 4, 1995, Exhibit A, Site Treatment Plan Compliance Plan Volume

Dear Mr. Plum and Mr. Hargis:

Revision 2.0 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 based on the reclassification request of TA-50-1 Waste Water Treatment Sludge from a mixed waste to a low-level radioactive waste by the Department of Energy (DOE) and University of California at Los Alamos National Laboratory (UC/LANL), 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 and allow the general public an opportunity to comment on the reclassification of the sludge waste stream. The thirty-day comment period has ended and no comments were received by the Hazardous and Radioactive Materials Bureau (HRMB).

Attached is the replacement for **Section 3.3 Mixed Waste Requiring Further Characterization for which Technology Assessment Has Not Been Done (MWIR Treatment ID LA-S701)**.

HRMB's revision is limited to the figures or numerical values found in the first table listed in of the STP/CPV, labeled **Treatability Groups**. For the readers, the former figures are those struck out while the new figures are indicated by redline. The previously proposed item numbers and respective volumes from the October 7, 1996 letter from Janice Archuleta (NMED/HRMB) to H.L. Plum (DOE/Los Alamos Operations Office) and Micheline Devaurs (UC/LANL) have been updated with those per the November 7, 1996 letter from H. L. Plum to Janice Archuleta. It also



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LANL RED FFCC/97

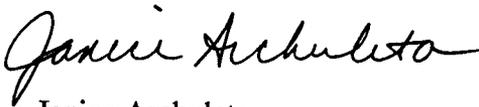
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had been overlooked previously that the totals in the table would also change. Subsequently, in the attachment, the totals have been modified to indicate the new waste volumes.

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

its possible availability to LANL after February 2002. Shipment off-site for treatment is a parallel preferred option. Respondents shall submit treatment or off-site shipment schedules and options for NMED's approval by November 30, 1998. Treatment or other options other than off-site shipment shall be carried out pursuant to the revision process. Off-site shipments must be completed by February 2002.

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 forty-five (45) working days of receipt of waste at the treatment facility.

3.3 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done (MWIR Treatment ID LA-S701)

Treatability Group(s):

| Treatability group | MWIR waste ID | RCRA codes | Number of items | Net volume (m ³) |
|-------------------------------|---------------|---|-----------------|------------------------------|
| lead wastes - TBD | LA-W924 | D003, D008 | 186 | 51.44 |
| mercury wastes - TBD | LA-W925 | D007, D008, D009, F001 | 63 | 18.30 |
| compressed gases - TBD | LA-W926 | D001, D007, D009, D022, P056, U080, U226 | 10 | 1.25 |
| biochemical laboratory wastes | LA-W927 | D001, D003 | 9 | 1.34 |
| dewatered treatment sludge | LA-W928 | see Subsection 3.3 in the Background Volume | 1228 | 268.17 |
| Totals | | | 1556 | 340.50 |

Treatment Technology:

The following steps will be taken to properly characterize this waste:

- Conduct additional generator interviews
- Prepare a sampling plan for waste not adequately characterized