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March 5, 1997

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Office of Environments and Projects
Albuquerque Operations Office
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Kenneth Hargis
STP Project Manager
Los Alamos National Laboratory
Los Alamos, NM 87445

RE: Clarification of Details in Revision 4.0 Request to Exhibit A, Site Treatment Plan Compliance Plan Volume (CPV) of Federal Facilities Compliance Order (FFCO)

Dear Mr. Plum and Mr. Hargis:

Hazardous and Radioactive Materials Bureau (HRMB) has received the request for Revision 4.0 to Exhibit A, Site Treatment Plan Compliance Plan Volume (CPV) of Federal Facilities Compliance Order (FFCO), October 4, 1995, Los Alamos National Laboratory and has questions and comments concerning some aspects of the request.

The questions and comments pertaining to the revision request for CPV *Section 3.4.2 Sorting, Surveying and Decontamination (SSD)* are stated below:

1. All items from SSD subgroups 1,2, and 3 are being reassigned to other treatability groups (TGs), and will no longer contain waste items. For which TGs would the request of compliance date extensions for Activity C and F (and the standing compliance date proposals for Activity I) apply? Would potential changes apply to any TG for which the waste was assigned, or for only the new TGs? In the case for any TG, would the compliance dates change for the entire TG, or only for the subsets of items from the SSD efforts? If the latter, how would this process be implemented? Please provide explicit information to clarify this item.
2. Because the request affects many TGs and the volume is significant, normally HRMB would require, within the request, an update for all the changed TGs in order to keep the

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H. L. Plum
K. M. Hargis
March 5, 1997
page 2

CPV current. However, because the timing of this revision request is close to that of the anticipated Annual Update Revision where all TGs will be updated, HRMB requests that the volumes and items associated with the SSD revision be incorporated into the Annual Update revision request.

3. Concerning the newly proposed TG labeled "Labpacks", HRMB takes the position that any new RCRA codes added to this TG would meet the definition for a new TG, and the new TG would have to be modified by the revision process. Also, as you are aware, regulations for storage compatibility under RCRA are to be followed for the bulking process.
4. The date for this revision to be completed without LANL being subject to non-compliance is April 30, 1997. HRMB will expedite the revision process for this request, however, due to the need for public notification, there is a chance that the revision will not be finalized by April 30, 1997. In such a case, Department of Energy (DOE) and University of California (UC) may prepare an amendment for a change to a compliance date of less than 90 days. (HRMB recommends DOE and UC communicate with HRMB on this matter in a timely fashion.)
5. The revision request that HRMB received (dated Feb. 28, 1997) did not have any italics, or editorial markings to indicate changes in the CPV. In order to expedite this request process, we would like a hard copy and a disk copy of these tentative changes.

I would be happy to have a meeting soon regarding these questions and comments in order to go forward with this revision request as quickly as possible. If there are any questions concerning this or other FFCO matters, please call me at (505) 827-1867 or 827-1558.

Sincerely,


Janice Archuleta

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cc: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau
Susan McMichael, OGC
Stu Dinwiddie, Program Manager, RCRA Permits Management