



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

ENTERED

APR 29 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Garcia:

Subject: Sort, Survey and Decontamination (SSD) Activities, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO), October 4, 1995 - Notification of Completion of Activities 3.4.2 C and F

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of completion of two required activities set forth in Rev. 3.0 of the FFCO (as revised January 27, 1997). The STP Compliance Plan Volume (CPV), Activities 3.4.2C and F, requires the Department of Energy (DOE) and the University of California (UC) to "(P)ropose additional compliance dates if necessary" for the covered waste items in subgroups 1 and 2 of the Treatability Group (TG) for Sort, Survey and Decontamination (SSD), MWIR ID LA-W929, by April 30, 1997. This notification is required by Section XX of the October 4, 1995 FFCO issued to LANL.

**Background**

In our February 28, 1997 letter to NMED, the documentation assigning the referenced items to TGs was provided as our Revision 4.0 request, prepared in accordance with the requirements of Section X.C.2, "Revisions," of the FFCO. DOE and UC requested on February 28, 1997 to revise the CPV language in Section 3.4.2 to:

1. assign the 1,250 referenced LA-W929 items to treatability groups; and
2. add two new treatability groups to CPV Section 3.3 (and modify one existing treatability group in CPV Section 3.2.1) as deemed necessary to accommodate some of the affected LA-W929 waste items.

This Revision 4.0 request is pending, and awaits DOE and UC's submittal of revised CPV text to NMED. The Revision 4.0 CPV text will be forwarded in a separate transmittal.

Please note, DOE and UC also requested on February 28, 1997 to make the compliance dates for Activities 3.4.2 C and F conform to existing Activity I. That request is hereby withdrawn, since DOE and UC are completing Activities 3.4.2C and F by submitting this letter.



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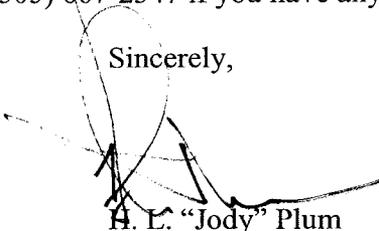
**Additional Compliance Dates**

DOE and UC have reviewed the waste item assignments proposed in Table 1 of Enclosure A of our February 28, 1997 letter and do not believe additional compliance dates need be requested for any of the 1,250 waste items at this time. We intend to treat these waste items according to the existing compliance dates associated with each of the treatability group assignments proposed in our Revision 4.0 request (see Attachment 1). Should additional compliance dates be needed at some time in the future for any waste items in these treatability groups, they will be requested through the revision process.

During our review of the proposed treatability groups for completion of these STP activities, we discovered some had been inadvertently omitted from the version of Table 1 of Enclosure A submitted in our February 28, 1997 letter. These omissions apparently occurred in the editing process during the preparation of the data in Table 1. The table submitted herein is correct, and we request that it replace the February 28 version.

A Certification statement is provided as Enclosure A. LANL's records and documents related to these requests are available to NMED's staff upon request. We would be happy to discuss the information contained in this letter with you at any time. Please contact me at (505) 665-5042, or Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,



H. L. "Jody" Plum

Office of Environment and Projects

LAAMEP:6JP-027

**Enclosures**

cc w/enclosures:

J. Archuleta

Hazardous and Radioactive Materials Bureau

New Mexico Environment Department

2044 Galisteo Street, Bldg. A

P. O. Box 26110

Santa Fe, New Mexico 87505

**ATTACHMENT 1**  
**PROPOSED TREATABILITY GROUP ASSIGNMENTS FOR LA-W929 SSD ITEMS**

(New/modified treatability groups are shown in *italics*)

| <b>Treatability group</b>       | <b>MWIR waste ID</b> | <b>RCRA codes</b>  | <b>Number of items</b> | <b>Net volume (m<sup>3</sup>)</b> |
|---------------------------------|----------------------|--|------------------------|-----------------------------------|
| aqueous organic liquids         | LA-W906              | D001 D002<br>D004 D005<br>D008 D010<br>D022 D027<br>D028 D030<br>D032 D033<br>D034 D037<br>D041 D042<br>D043 F001<br>F002 F003<br>F005 U002<br>U003 U154   | 27                     | 0.36                              |
| halogenated organic liquids     | LA-W907              | D001 D002<br>D004 D007<br>D018 D019<br>D022 D039<br>F002 F003<br>F005 U022<br>U044 U045<br>U077 U080<br>U188 U210<br>U211 U225<br>U226 U227<br>U228  | 97                     | 1.05                              |
| non-halogenated organic liquids | LA-W908              | D001 D002<br>D003 D004<br>D005 D007<br>D008 D009<br>D011 D018<br>D030 D035<br>D043 F003<br>F005 U002<br>U003 U012<br>U019 U052<br>U056 U057<br>U080 U117<br>U122 U140<br>U154 U159<br>U213 U220<br>U226 U239<br>U359 | 409                    | 3.38                              |

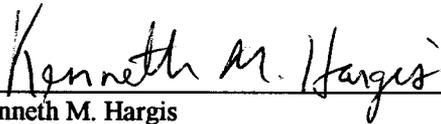
| Treatability group                                   | MWIR waste ID | RCRA codes  | Number of items | Net volume (m <sup>3</sup> ) |
|--|---------------|---|-----------------|------------------------------|
| bulk oils  | LA-W909       | F001 D001   | 8               | 1.48                         |
| organic-contaminated combustibile solids             | LA-W911       | D001 D003<br>D004 D018<br>D022 D038<br>F001 F002<br>F003 F005<br>U165                   | 33              | 0.68                         |
| combustible debris                                   | LA-W912       | D001 D002<br>D003 D008<br>D011 F002   | 9               | 0.75                         |
| aqueous waste with heavy metals                      | LA-W913       | D001 D002<br>D003 D004<br>D005 D006<br>D007 D008<br>D009 D010<br>D011 F001<br>F003 F005 | 25              | 0.40                         |
| corrosive solutions                                  | LA-W914       | D001 D002<br>D003 D005<br>D009 D010<br>D011 U133<br>U134                                | 90              | 0.36                         |
| aqueous cyanides, nitrates, chromates, and arsenates | LA-W915       | D001 D002<br>D003 D007<br>D009  | 3               | 0.002                        |
| water reactive wastes                                | LA-W916       | D001 D003<br>D005 F002  | 26              | 0.31                         |
| compressed gases requiring oxidation                 | LA-W918       | D001 D003<br>D007 F002<br>F003 P056<br>U029 U075<br>U121 U226<br>U227 U228              | 168             | 1.23                         |
| organic-contaminated non-combustibile solids         | LA-W919       | D001 F001<br>F002 F003<br>F005  | 9               | 0.38                         |
| elemental mercury                                    | LA-W920       | D009 U151   | 20              | 0.02                         |
| non-combustibile debris                              | LA-W922       | D002 D003<br>D004 D006<br>D007 D008<br>D009 D010<br>D011                                | 53              | 2.84                         |

| <b>Treatability group</b>         | <b>MWIR waste ID</b> | <b>RCRA codes</b>  | <b>Number of items</b> | <b>Net volume (m<sup>3</sup>)</b> |
|-----------------------------------|----------------------|--|------------------------|-----------------------------------|
| mercury wastes - TBD              | LA-W925              | D001 D002<br>D003 D009<br>P030   | 37                     | 0.42                              |
| <i>explosives</i>                 | <i>LA-W932</i>       | <i>D003</i>  | <i>1</i>               | <i>0.000001</i>                   |
| <i>lab packs</i>                  | <i>LA-W933</i>       | <i>D001 D002<br/>D003 D004<br/>D005 D006<br/>D007 D008<br/>D010 D011<br/>P012 P029<br/>P098 P106<br/>P113 P120<br/>U131 U144<br/>U145 U188<br/>U190 U204<br/>U216 U219</i> | <i>114</i>             | <i>0.17</i>                       |
| <i>liquid and solid oxidizers</i> | <i>LA-W923</i>       | <i>D001 D002<br/>D003 D005<br/>D007 D011<br/>U160</i>  | <i>67</i>              | <i>0.14</i>                       |
|                                   | Missing              | D001 D002<br>D003 D007<br>D008 D010<br>D035 U220<br>U226   | 41                     | 0.26                              |
|                                   | Treated              | D001 D002<br>D004 D005<br>D006 D007<br>D008 D009<br>D010 D011<br>F003  | 13                     | 0.01                              |
| <b>Totals</b>                     |                      |  | <b>1250</b>            | <b>14.24</b>                      |

**ENCLOSURE A  
CERTIFICATION**

**SORT, SURVEY AND DECONTAMINATION (SSD) ACTIVITIES, LOS ALAMOS NATIONAL  
LABORATORY (LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO), OCTOBER 4,  
1995 - NOTIFICATION OF COMPLETION OF ACTIVITIES 3.4.2 C AND F**

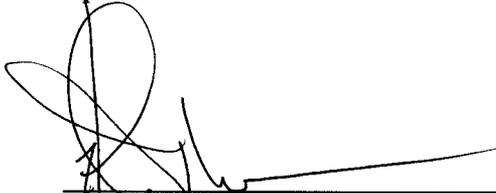
I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



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

4/24/97

Date Signed



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

4/28/97

Date Signed