

RED LAMU FFCO197



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GOVERNOR

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ENTERED



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DEPUTY SECRETARY

October 1, 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: Receipt of the 1996 Annual Update

Dear Mr. Plum and Mr. Hargis:

Thank you for sending the 1996 Annual Site Treatment Plan Update (Annual Update) to the Compliance Plan and Background Volumes of the Federal Facilities Compliance Order (FFCO), Oct. 4, 1995 (as amended and revised). The Annual Update was received in March 1997, as stipulated by the FFCO.

Upon review of the report, I would like to add a few informational comments to the Annual Update. These are listed below.

In Section 2.1 *Further Lead Processing Activity Schedule*, in the last sentence it is stated, "NMED concurred with LANL's submitted schedule and incorporated it in Revision 1.0 in June 1996..." This schedule was later withdrawn from Revision 1.0 upon discussion with NMED General Counsel. Because the compliance dates were to be implemented, the schedule met the requirements for a new revision. This topic was discussed in the February 25, 1997 letter from Janice Archuleta (NMED) to H. L. Plum (DOE) and Kenneth Hargis (UC). This was also discussed in a meeting that took place at HRMB/NMED on June 24, 1997 with H. L. Plum, Paul Schumann, Walter Medina and Janice Archuleta present. Although these discussions and correspondence did not occur within the timeframe of the update, I thought that it should be mentioned for the purpose of clarification, at least in this letter.

In Section 6.3, *Sort, Survey, and Decontamination (FFCO Rev. 3.0)*, an amendment to the CPV was also requested by DOE and UC and approved by NMED on October 30, 1996 concerning this effort. Amendment 1.0 divided the one treatability group into three parts with designated



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volumes and associated new compliance dates with the additional (new) categories. The compliance dates for the new categories deviated 90 days or less from the date of the original treatability group.

Because there have been some discrepancies about the volumes of specific treatability groups in the past, the accuracy of the volumes for the treatability groups listed in the Annual Update tables may be verified by NMED/HRMB enforcement staff in the future.

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

Sincerely,

  
Janice Archuleta, FFCO Project Manager

ja

c: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau  
John Tymkowych, Program Manager, RCRA Enforcement/Inspections Program  
Walter Medina, Environmental Specialist  
Susan McMichael, OGC