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**ENVIRONMENT DEPARTMENT**  
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November 26, 1997

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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: Revisions 4.0 and 5.0 Requests to Site Treatment Plan Compliance Plan Volume to the FFCO Public Comment Period

Dear Mr. Plum and Mr. Hargis:

In response to Revisions 4.0 and 5.0 requests to the Federal Facility Compliance Order (FFCO), Compliance Plan Volume (CPV) Site Treatment Plan (STP), Exhibit A, (Oct. 4, 1995, as revised and amended) by the Department of Energy (DOE) and University of California at Los Alamos National Laboratory, the New Mexico Environment Department Hazardous and Radioactive Materials Bureau has reviewed the information and is implementing the public notice process and 30 day public comment period. A copy of the announcement is attached.

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

Sincerely,

*Janice Archuleta*  
Janice Archuleta, FFCO Project Manager

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enclosure

- c: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau
- Stu Dinwiddie, Manager, RCRA Permits Management
- Walter Medina, Environmental Specialist
- Susan McMichael, OGC



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## Public Notice

On October 4, 1995, the New Mexico Environment Department (NMED) issued a Federal Facility Compliance Order (FFCO) requiring compliance by the United States Department of Energy (DOE) and Regents of the University of California (UC) with a Site Treatment Plan (STP) Compliance Plan Volume (CPV) for the treatment of mixed waste at the Los Alamos National Laboratory, New Mexico (LANL) pursuant to the New Mexico Hazardous Waste Act (HWA), NMSA 1978, §§ 74-4-1 et seq. (Repl. Pamph. 1993) and Section 3021(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6939 (c), as amended by the Federal Facility Compliance Act of 1992, Pub. L. 102-386, 106 Stat. 1505 (1992) (FFC Act). Under Section X. "Revisions" of the FFCO, all proposed or required revisions shall be available for public review and comment.

DOE and UC have requested Revisions 4.0 and 5.0 to the STP/CPV. Revision 4.0 pertains to the disposition of items in Section 3.4.2, Sort, Survey, Decontamination (Mixed Waste Inventory Report [MWIR] Code LA-W929) after conclusion of the effort. The following changes are requested: (1) Transfer items in Section 3.4.2, Sort, Survey, Decontamination, to other existing treatability groups for treatment according to their established Compliance Dates, and, establish two new treatability groups (TGs) with associated activities and compliance dates to accommodate some waste items. The new TGs will be labeled as "Labpacks" and "Explosives"; (2) Revise language to include establishment of category for items listed on inventory which physically have not been located and may not have ever existed. Items will remain in this category until all inventory has been treated then they will be administered in fulfillment of the FFCO, as revised and amended; (3) Document deletion of thirteen items from Section 3.4.2 which have already been treated; and (4) Change TG from Solid Oxidizers to Solid and Liquid Oxidizers Section 3.2.1 (MWIR Code LA-W923) to accommodate waste characterized as such and add items as required by (1) above.

Requested Revision 5.0 considers the following: (1) Updating the inventory to include all changes made since the original FFCO to October 1996. Increases to the inventory to reflect additions, through incorporation of new waste and corrections as well as decreases due to disposition of waste for shipments for treatment, treatment or recategorized waste and corrections; (2) Addition of newly generated waste as covered waste; (3) Recategorization of one item in Section 3.1.1, Soil with Heavy Metals (MWIR code LA-W904) and six from Section 3.4.1, Lead Decontamination (MWIR Code LA-W930) which have not been located and may not exist, to the category established in Revision 4.0 Request (2) above; (4) Modification of Compliance Dates for Activities 3.1.2B and 3.3E. (5) Addition of two informational appendices to the CPV; (6) The formal incorporation of the schedule required to fulfil activity A in Section 3.4.1; and (7) Incorporation of language to address treatment/recycling as off-site treatment option.

A copy of the proposed revisions with detailed descriptions will be made available for public review and written comment for thirty (30) days from the date of this publication at the following location:

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Contact: Stella Montoya (505) 827-1558  
Written comments: Janice Archuleta