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Red LANT
FFCO/98

July 27, 1998

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: Approval of Shipment of Waste for Treatability Study at ORNL

Dear Mr. Plum and Mr. Hargis:

I have received the letter of notification dated July 1, 1998 from H. L. Plum, Department of Energy (DOE), to ship covered waste to Oak Ridge National Laboratory (ORNL) for a treatability study. The waste to be sent is a one liter volume of used vacuum pump oil contaminated with heavy metals, benzene and low levels of radioactivity. The covered waste currently is not in the inventory of the Site Treatment Plan (STP) Compliance Plan Volume (CPV) of the Federal Facility Compliance Order. A discussion of the treatment options currently available for this waste had occurred previously between Beverly Martin and myself. It was understood that waste treatment options are very limited for this type of waste.

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) will grant approval to the DOE and University of California at Los Alamos National Laboratory (UC/LANL) to ship the above waste, (due to the consideration of the limited availability of treatment options and the volume of the waste).

The STP CPV is a "living document" and in order to avoid an abundance of revisions for each change to the inventory that may occur, HRMB and DOE and UC/LANL have agreed that each year, the inventory of the STP CPV will be updated in one revision which would reflect the yearly changes reported in the Annual Update of the preceding year, (unless it was decided that more are needed, due to circumstances such as a huge volume of waste being added at once to the inventory). Therefore, HRMB requests that the above waste be added to the *revision* request that will include the inventory update as reported in the Annual Update for Fiscal Year 1998. The



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July 1 letter indicated that this waste would be added to Section 3.2.1, Treatability Group, "Nonhalogenated Organic Liquids," MWIR waste ID LA-W980, in the Annual Report for FY 1998.

The HRMB is aware of possible issues between states. From the attachment to the July 1 letter, it appears as though the transfer of waste between New Mexico and Tennessee for treatability study intentions is not an issue. I also contacted Bill Childres of the Tennessee Department of Environment and Conservation, Department of Energy Oversight Division, who assured HRMB that the shipment of the waste to, and the treatment of the waste at ORNL would not be a problem.

Please contact me at (505) 827-1867 if there are any questions relating to this letter or any other CPV matters.

Sincerely,


Janice Archuleta,
FFCO Project Manager

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cc: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau
Susan McMichael, NMED/OGC
John Tymkowych, Program Manager, RCRA Inspections and Enforcement
Walter Medina, Environmental Specialist
Bill Childres, TN Department of Environment and Conservation