



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo Street  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



PETER MAGGIORE  
SECRETARY

November 16, 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: Extension Request for Activity 3.1.4A

Dear Mr. Plum and Mr. Hargis:

I have received your letter dated November 13, 1998 for an extension request to meet Milestone Activity 3.1.4.A in Exhibit A, the Site Treatment Plan (STP) Compliance Plan Volume (CPV) of the Federal Facility Compliance Order as amended and revised. The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) does not see the need for this extension based on the following criteria:

- ⇒ The June 30, 1998 letter from you (Department of Energy [DOE] and Los Alamos National Laboratory [LANL] University of California [UC]), the Revision 7.0 request, included removal of this compliance activity and date,
- ⇒ Information provided in the November 13, 1998 correspondence from you delineating that the Compliance Activity 3.1.4. A would not be pursued, and the parallel option would be pursued for waste in this treatability group in its stead,
- ⇒ As in dealing with similar situations that arose in the past two years for wastes in the STP CPV with more than one treatment option, the compliance activity and associated milestones for a treatment option that was not being pursued, need not be considered for compliance. The DOE and LANL/UC have been corresponding with NMED on those options which were not being considered for a given treatability group (for record-keeping purposes), and that they consequently would not have a compliance activity to perform and not have the associated milestones to meet. The letters cited above provided such information.



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Reel LANL FF00/98

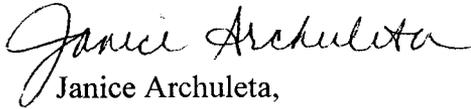
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Because there is no need for Compliance Activity 3.1.4.A at any time in the future, HRMB "exempts" DOE and LANL/UC from meeting the corresponding Compliance Date of November 16, 1998; therefore there is no need for an extension of the Compliance Date either.

Please contact me at (505) 827-1566 if there are any questions relating to this letter or any other CPV matters.

Sincerely,



Janice Archuleta,  
FFCO Project Manager

ja

cc: Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau  
Susan McMichael, NMED/OGC  
Walter Medina, Environmental Specialist