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GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
Hazardous & Radioactive Materials Bureau  
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(505) 827-1557  
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PETER MAGGIORE  
SECRETARY

December 3, 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: Finalization of Revision 8.0 Request to FFCO STP CPV**

Dear Mr. Plum and Mr. Hargis:

The Revision 8.0 request to the Site Treatment Plan (STP) Compliance Plan Volume (CPV) of the Federal Facility Compliance Order (FFCO) has been approved by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED). No public comment was received during the public review period of thirty days. The draft Revision 8.0 presented in the September 10, 1998 correspondence from you was revised per the October 2, 1998 letter from me. The final version incorporated the change.

Please find enclosed the final version of Revision 8.0, replacement pages of the applicable sections only: a redline strikeout hard copy, a clean (no editing marks) hard copy, and electronic copies of the revision.

Please contact me at (505) 827-1867 if there are any questions relating to the FFCO.

Sincerely,

*Janice Archuleta*  
Janice Archuleta,  
FFCO Project Manager

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c(without enclosure): Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau  
Walter Medina, Environmental Specialist

c (with enclosure): Susan McMichael, NMED/OGC  
FFCO file



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**EXHIBIT A**

**LOS ALAMOS NATIONAL  
LABORATORY**

**MIXED WASTE SITE TREATMENT PLAN  
COMPLIANCE PLAN VOLUME (CPV)**

**BACKGROUND VOLUME**

**Revision 8.0**

**December 1998**

**(Rev. 8.0 12/98)**

#### 4.0 MIXED TRANSURANIC WASTE.

##### Treatment Group(s):

Assorted Mixed Transuranic Waste

##### Treatment Technology:

Respondents are required to develop treatment technologies and treat mixed transuranic (MTRU) waste at LANL according to the schedule set forth below.

Activity	Compliance Date
A. Development of treatment technologies	June 30, 2004
B. Submit permit application amendment or modification to NMED for treatment of MTRU	December 31, 2004
C. Begin treating MTRU	Six (6) months after NMED permit issuance
D. Complete treatment of existing MTRU to applicable regulatory standards	December 31, 2010

The above schedule is not based on the assumption that WIPP will be a disposal option or that DOE will receive a variance from treatment standards for land disposal of MTRU waste to be disposed at WIPP. All revisions to compliance dates shall be in accordance with the procedures set forth in the compliance order. Should WIPP open, the DOE will begin to transport MTRU for disposal as soon as possible, and not wait until the compliance dates under Activity A and B occur (if applicable).

**CPV APPENDIX A.  
HISTORY OF STP REVISIONS AND AMENDMENT.**

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "*Revisions,*" and Section XI, "*Other Amendments to the STP,*" of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been eight revisions and two amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's *STP Annual Update*, and the original correspondence requesting each change.

**Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.**

<b>Action</b>	<b>Document Modified</b>	<b>Effective Date</b>	<b>Effect on FFCO/STP</b>
Rev. 8.0	STP/CPV	<i>December 1998</i>	Extended compliance dates for treatment of MTRU waste.

**EXHIBIT A**

**LOS ALAMOS NATIONAL  
LABORATORY**

**MIXED WASTE SITE TREATMENT PLAN  
COMPLIANCE PLAN VOLUME (CPV)**

**BACKGROUND VOLUME**

Revision ~~8.0~~ 7.0

~~December~~ November 1998

(Rev. ~~8.0 12/98~~ 7.0 11/98)

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C. Begin treating MTRU	Six (6) months after NMED permit issuance
D. Complete treatment of existing MTRU to applicable regulatory standards	December 31, 2010

The above schedule is not based on the assumption that WIPP will be a disposal option or that DOE will receive a variance from treatment standards for land disposal of MTRU waste to be disposed at WIPP. All revisions to compliance dates shall be in accordance with the procedures set forth in the compliance order. Should WIPP open, the DOE will begin to transport MTRU for disposal as soon as possible, and not wait until the compliance dates under Activity A and B occur (if applicable).

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