

Los Alamos

NATIONAL LABORATORY

Hazardous & Solid Waste Group (ESH-19)
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ESH-19:98-0180

September 22, 1998

Mr. Mark Coffman
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
Harold S. Runnels Building
1190 St. Francis Dr.
Santa Fe, NM 87505-4182

Dear Mr. Coffman:

SUBJECT: HANFORD SLUDGE SAMPLES

On September 2, 1998, during the annual RCRA inspection, I spoke with you regarding an issue that we were looking at in connection with some sludge samples that Los Alamos National Laboratory (LANL) had received from the Department of Energy facility in Hanford, Washington. I agreed to get back to you on this issue by letter and so this letter is my follow-up.

The sludge samples, consisting of approximately 1100 grams, had been sent to LANL under the sample exclusion provided for in 20 NMAC 4.1.300, incorporating by reference 40 C.F.R. 262.4(d), and the excess of these samples is in the process of being returned to the Hanford facility under the same exclusion. The issue that I spoke about concerned whether LANL may have engaged in a treatability study in the course of testing these sludge samples.

I have reviewed the processes involved and consulted with others in ESH-19 (the Solid and Hazardous Waste Group), and NMT-1 (the Analytical Chemistry Group) researchers. I have also considered the applicable regulations, including the provisions of 20 NMAC 4.1.300, incorporating by reference 40 C.F.R. 262.4(e)-(f), which identify the requirements for treatability studies, and 20 NMAC 4.1.101, incorporating by reference 40 C.F.R. 260.10, which define "treatability study" and "treatment." Based on my review, we have concluded that no treatability study occurred with regard to the sludge samples, as no "treatment" within the meaning of the regulatory definition of this term occurred.



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If you have questions, please feel free to contact me through E-mail (carmichaelj@lanl.gov) or by phone at 665-2505.

Sincerely,



Jeff Carmichael
Hazardous & Solid Waste

JAC:em

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