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State of New Mexico
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February 10, 1997

G. Thomas Todd, Area Manager
DOE/LANL/Los Alamos Area Office
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

RE: Low-level Radioactive Waste Water Treatment Facility (TA-50-1) Reconfiguration

Dear Mr. Todd:

New Mexico Environment Department (NMED) is aware that the Low-level Waste Treatment Facility will be modified in the near future, with possible startup dates planned as early as spring 1997 for the improved system. While work on this project proceeds at Los Alamos National Laboratory (LANL), the Hazardous and Radioactive Materials Bureau (HRMB) has not been officially informed of any specific planned changes. HRMB is concerned about the potential generation of Resource Conservation and Recovery Act (RCRA) waste streams, especially any process that may generate mixed waste and mixed transuranic waste. HRMB believes that it would be beneficial if LANL involve HRMB during the preparation of waste characterization documentation. Discussion, review, and comment of documentation which lists techniques, procedures, process description, acceptable knowledge processes and other planning strategies prior to finalization and subsequent generation of the waste would ensure that the waste is properly characterized, and that there is a mechanism for proper waste storage and disposal.

For instance, one area of HRMB's concerns is transuranic mixed waste. If transuranic waste, a potential end-product of the reconfiguration, is planned to be shipped to Waste Isolation Pilot Plant (WIPP), the waste acceptance criteria specific to WIPP must be met for these wastes. The wastes must also meet the finalized LANL waste analysis plan for transuranic mixed waste.



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Please consider HRMB involvement early on in the process so that changes may be incorporated into respective documentation without the potential delay of plant operations. If there are any questions concerning this matters, please call me at (505) 827-1558.

Sincerely,



Benito J. Garcia

BJG:ja

cc: Janice Archuleta, FFCO Project Manager
Stu Dinwiddie, Program Manager, RCRA Permits Management
Teri Davis, RCRA Permits Management
Susan McMichael, OGC
Ralph Ford-Schmid, DOE Oversight Bureau