



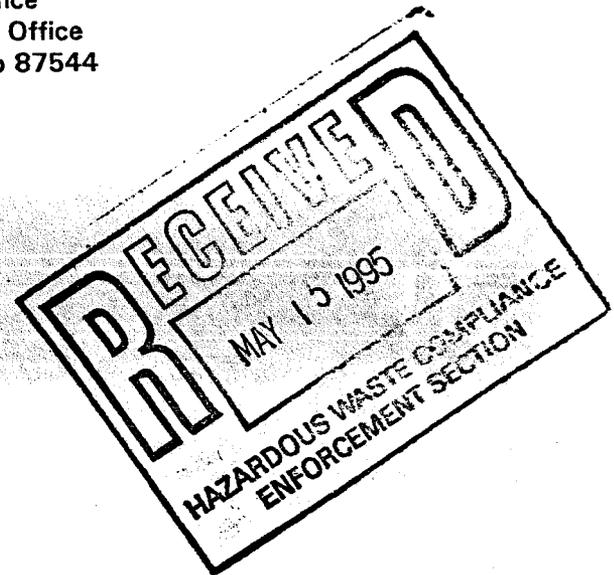
Department of Energy

Los Alamos Area Office
Albuquerque Operations Office
Los Alamos, New Mexico 87544

MAY - 8 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dr. Joel Dougherty
ALONM Section (6H-CS)
RCRA Enforcement Branch
Hazardous Waste Management Division
Region 6
U. S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733



Dear Dr. Dougherty:

Subject: Amended Request for Modification of Controlled Air Incinerator (CAI) Operations Milestones, Federal Facility Compliance Agreement (FFCAgreement), Milestones CAI 100, 200, 300

In our letter dated December 23, 1994, the Department of Energy (DOE) requested a modification to one of the milestones in the FFCAgreement regarding land disposal restriction requirements at Los Alamos National Laboratory (LANL) between DOE and the Environmental Protection Agency (EPA). The milestone which DOE requested to be modified is CAI 200, *Complete RCRA Trial Burn*, which defines certain activities required prior to commencing waste treatment operations in the CAI. Following additional discussions and correspondence between our staffs, DOE amended its modification request on March 10, 1995, requesting that CAI milestones 100, 200 and 300 be deleted and replaced with the language on page 5 of this letter, as well as the table at the top of page 15 of the Compliance Plan. Replacement language for the last paragraph on page 14 was also provided. This request was made pursuant to Section XIV of the FFCAgreement.

By your letter dated March 31, 1995, EPA agreed in principle with the proposed modifications to adjust the timing of the trial burn; however, EPA requested that DOE address several concerns:

- Milestones CAI 200 and CAI 300 are interrelated to other milestones, specifically HLL 100, HLL 200, TRU 100, HW 600, and OSS 200. EPA requested a concise assessment of the effect deleting the CAI milestones CAI 200 and CAI 300 will have on these milestones.
- EPA requested a brief assessment of the impact of deleting the CAI from the treatment train, identifying total volumes of waste involved, the effect on timeliness (duration) of the treatment schedules, known/proven alternatives to incineration, and the potential to use similar offsite units (commercial facilities or other DOE incinerators, e.g., at Savannah River Site).



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- EPA wishes there to be an enforceable mechanism to ensure compliance with the guidelines presented in EPA's *Strategy for Hazardous Waste Minimization and Combustion*, especially to ensure that the elements of Indirect Risk Assessment and Public Involvement are an integral part of the permitting process for the CAI mixed waste operations.
- EPA requested that DOE add language to the modification that will ensure the Region is copied on all correspondence and submittals required by NMED for permitting the CAI.

These concerns are addressed in the following paragraphs.

1. Interrelationship of CAI With Other Milestones.

In addition to the existing interrelationships among milestones CAI 100, CAI 200 and CAI 300, these milestones are related to five others: HLL 100, HLL 200, TRU 100, HW 600, and OSS 200, as follows:

HLL 100 - Information developed from the implementation of the Low-Level Mixed Waste (LLMW) Characterization Plan is to be reviewed during the process of completing of CAI 200 and CAI 300. This information is significantly changing LANL's knowledge of its legacy LLMW, as originally presented in Tables 1 and 2 of Appendix B, Attachment A, to the FFC Agreement. This may shift slightly the selection of surrogate materials for the trial burn (CAI 200) from that anticipated at the time of signing of the FFC Agreement, because the characterization of legacy LLMW for treatment could identify additional waste streams for inclusion in the CAI work-off plan (CAI 300) that were not previously considered to be candidates for the CAI, and cause others previously identified as CAI candidates to no longer be considered suitable for the CAI.

This new HLL 100 characterization data has been incorporated into the Proposed Site Treatment Plan (PSTP) (enclosed) delivered to the New Mexico Environment Department (NMED) in March 1995. The PSTP provides for use of the CAI and/or treatment skids as parallel preferred options for the management and treatment of the waste streams identified in the LLMW Characterization Plan, including the waste streams originally designated to go to the CAI. The PSTP presents DOE and LANL's current plan for future treatment of these waste streams.

HLL 200 - The LLMW Prioritization Plan was developed to provide LANL with a uniform ranking methodology to prioritize LLMW streams at LANL for treatment in existing on-site facilities, and for the development of skid mounted treatment units at LANL for wastes having no currently existing treatment technology or capacity. The ranking methodology outlined in HLL 200 prioritizes waste streams in terms of long-term storage risk. If waste streams are not suitable for off-site treatment and disposal, characterization data will be reviewed to determine whether they are suitable for treatment in the CAI. If not, then they will be scheduled for treatment in a skid mounted treatment unit, which may already exist, or which may need to be developed. The prioritization plan is to be reviewed to support selection of surrogate materials for the RCRA trial burn (CAI 200) and to develop the schedule for incinerating wastes in the CAI work-off plan (CAI 300).

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The PSTP provides schedules for treating the identified waste streams. It follows the same general approach as HLL 200, but replaces the methodology developed in HLL 200.

TRU 100 - Information developed during the CAI's trial burn is to be used to support development of the TRU work-off plan specifically for the combustible TRU waste presented in Table 3 of Appendix B, Attachment A to the FFC Agreement. The PSTP now provides schedules for managing the combustible TRU waste. This waste is planned to be sent to WIPP.

HW 600 - Applicable information developed for the CAI work-off plan (CAI 300) was to be reviewed and used as appropriate to support the development of the LLMW work-off plan for the Hazardous Waste Treatment Facility (HWTF) (HW 600). The PSTP now includes the waste streams that would have been identified in HW 600 for treatment at the HWTF, but does not include the LLMW work-off plan as a specific milestone. Those waste streams that could be either incinerated in the CAI or treated in a specific skid in the HWTF, are to be addressed in the PSTP operating schedules for both technology options.

OSS 200 - Both the FFC Agreement and the PSTP provide for the use of off-site treatment capacity for applicable wastes, as it becomes available. The PSTP currently includes only two incinerable waste categories for which a specific off-site treatment facility was identified. The CAI and a skid were identified as alternate options for these wastes. Wastes not suitable for off-site treatment and disposal were to be addressed in the LLMW work-off plan for the CAI (CAI 300) and/or the LLMW work-off plan for the HWTF (HW 600), and are now planned to be addressed either by the CAI, or an appropriate treatment skid under the PSTP.

CAI 300 - The CAI work-off plan was to be based on a review of the LLMW streams for their suitability for incineration. The PSTP now includes the waste streams to be considered for incineration, and has either assigned them to that treatment technology (either off-site or using the CAI), or has identified another appropriate treatment technology as a parallel preferred option. Therefore, development of a specific CAI work-off plan (under CAI 300) prior to completion of either the Site-Wide Environmental Impact Statement (SWEIS) or the final Site Treatment Plan would be inappropriate.

2. Impact of Deleting the CAI from the Treatment Train.

The CAI was identified as a key component for the treatment of certain classes of mixed wastes. The enclosed Table 1 illustrates the possible impact for each of the potentially CAI-incinerable waste stream categories given in Appendix B, Attachment A to the FFC Agreement (note that this Appendix was updated in the *FY 94 FFCA Annual Report* [AR 100, July 1994]). As indicated in Table 1, all waste stream categories identified in Appendix B would experience delays in treatment of varying length from the time frame initially anticipated in the FFC Agreement, which presumed start-up of CAI operations under interim status shortly after completion of a successful trial burn. Additionally, as Table 1 indicates, the incinerable TRU wastes now are planned to be transferred to WIPP, per the PSTP, while non-RCRA-regulated radioactive PCB wastes which could have been incinerated on-site under the CAI's Toxic Substance Control Act permit now must continue to be stored until alternative capacity becomes available.

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3. Compliance With the EPA's Strategy for Hazardous Waste Minimization and Combustion.

EPA has expressed concern that the elements of Indirect Risk Assessment and Public Involvement be an integral part of the permitting process for the CAI mixed waste operations. EPA also proposed that DOE submit modification language to be incorporated into the FFC Agreement which addresses the concerns presented in EPA's letter and integrates the components of EPA's Strategy. Guidelines in EPA's *Strategy for Hazardous Waste Minimization and Combustion* specifically addressing the elements of Indirect Risk Assessment and Public Involvement are as follows:

Indirect Risk Assessment: The draft strategy established a general policy that risk assessments be performed prior to final permit determinations for all hazardous waste incinerators. This policy is carried into the final strategy. These risk assessments should draw on the guidance issued by EPA in two technical documents - a draft Addendum to the 1990 EPA/ORD indirect risk guidance and a draft EPA/OSW combustion facility risk assessment guidance, specifically addressing the indirect exposure pathways.

DOE and LANL have developed analyses responsive to many of the elements of this guidance in various safety documents and environmental permit applications pertaining to the CAI. It is anticipated that additional risk analyses will need to be developed by DOE before October 1997 in order to meet the requirements of the SWEIS.

The CAI was permitted by NMED in November 1989. The CAI-specific portions of this permit are currently undergoing modification. DOE proposes to present documentation concerning these analyses to NMED, upon their request. NMED will incorporate this information into the permit modification process for the CAI as appropriate, to ensure compliance of the CAI permit with the risk assessment element of EPA's Strategy.

Public Involvement: EPA's Strategy is intended to ensure that local communities and citizens are heard in discussions on national policy as well as in individual facility-related activities. EPA's planned summer 1995 final rule to enhance general public involvement opportunities in the permitting process, and its continued efforts to implement measures designed to maximize community-based public involvement in RCRA permitting and compliance/enforcement decisions, support this element of the Strategy.

DOE and LANL believe their previous and planned future public participation activities surrounding the CAI, as discussed in DOE's letter to you dated December 23, 1994, together with those activities that have been, and are expected to be implemented by NMED in connection with both the CAI's proposed permit modifications and the FFC Act, meet the requirements of the EPA memorandum of 1994, and parallel or surpass those undertaken by similar facilities in the private sector for whom the National Environmental Policy Act is not directly applicable.

4. DOE/EPA/NMED Coordination.

EPA requested that DOE add language to the FCCAgreement to provide that the Region is copied on all correspondence and submittals required by NMED for permitting the CAI. DOE therefore proposes that the following sentence be added at the end of Paragraph 1 of Section IX of the FCCAgreement, "Submittal, Review, and Approval of Deliverables:"

Additionally, though not "deliverables" as defined in this Agreement, DOE shall submit copies of all correspondence it transmits to NMED concerning the RCRA Permit for the Controlled-Air Incinerator to both NMED and EPA.

5. Summary of Proposed Modifications.

To address the other issues discussed in this letter, DOE proposes the following modifications to the FCCAgreement, which restate and supersede the modifications proposed by DOE in its March 10, 1995 letter:

- Delete the CAI milestones (CAI 100, CAI 200, and CAI 300) and the table at the top of page 15 of the Compliance Plan; and
- Replace the last paragraph of page 14 of the Compliance Plan with the following:

In the first annual report following issuance of the Record of Decision for the LANL Site-Wide EIS, DOE shall provide a new CAI milestone, which will contain, (1) a plan and schedule (or a date for providing such plan and schedule) for start-up of the CAI and work-off of mixed wastes to be treated in the CAI. This plan and schedule shall describe in detail DOE's activities to ensure compliance with the requirements of the EPA Strategy for Hazardous Waste Minimization and Combustion; or (2) a plan and schedule (or a date for providing such plan and schedule) for treating such mixed waste at an alternate facility (or by an alternate method), if the Record of Decision provides that the CAI will not operate. DOE shall implement the plan following approval by the EPA.

- Include the sentence in Section IX of the FCCAgreement, as discussed under Section 4 of this letter.

Finally, DOE requests that EPA expand its waiver of the requirements of milestone CAI 200 to include a waiver of the requirements of milestones CAI 100 and CAI 300 as well, pending the completion of these modifications pursuant to Section XIV of the FCCAgreement. The delay of activities and loss of funding leading to full-scale operations of the CAI, for the reasons discussed in our February 3, 1995 meeting and in DOE's March 10, 1995 letter, requires DOE to immediately implement staff reductions and other cutbacks which led to DOE's previous request that these milestones be deleted.

DOE remains committed to implementing the FCCAgreement until the State issues an order requiring compliance with the Site Treatment Plan being developed under the Federal Facilities Compliance Act. DOE is also committed to ensuring that public participation for the CAI and other LANL facilities is made available in a timely and effective manner. We are

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available to discuss this matter further with EPA at any time. If you have any questions, please call Jon Mack of my staff at (505) 665-5026, or me at (505) 665-5027.

Sincerely,

Eugene Colton for

Joseph C. Vozella
Assistant Area Manager
Office of Environment and
Projects

5/8/95

LAAMEP, 9JP-001

Enclosures

cc w/enclosures:

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K. Elsberry, CST-16, LANL, MS-E517
J. White, ESH-19, LANL, MS-K490
S. Brown, LC-GEN, LANL, MS-A187
R. Nevarez, WMD, AL

cc w/o enclosures:

D. Erickson, ESH-DO, LANL, MS-K491
A. Gancarz, CST-DO, LANL, MS-J515
A. Drypolcher, CST-27, LANL, MS-E517
P. Schumann, ESH-19, LANL, MS-K498
ESH-19 (95-0205.PS) File, LANL, MS-K490

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFC Agreement	Schedules For Alternatives Identified in the PSTP	Comments
<p>10. Debris F002 1,1,1-trichloroethane, trichloroethylene</p>	<p>Table 1 - Low-Level Solid Mixed Wastes (7/18/94)</p>	<p>771.41 (21.85 m³)</p>	<p>Incineration and DETOX (chemical oxidation) were selected treatment. No available treatment was identified. Treatment facilities were CAI and HWTF. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)</p>	<p>CAI/Thermal Desorption PSTP-CPV-3.1.4/3.1.5 CAI - Submit schedule for operations for mixed waste treatment 03/31/98 Thermal Desorption - Commence operations 02/02/01</p>	<p>FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes a delay in treatment by delaying operation of the CAI until 03/31/98, or if the CAI is not the chosen option, delay until 02/02/01 for treatment in the thermal desorption skid.</p>
<p>11. Debris F003 acetone, methanol, xylene</p>	<p>Table 1 - Low-Level Solid Mixed Wastes (7/18/94)</p>	<p>71.54 (2.03 m³)</p>	<p>Incineration and DETOX (chemical oxidation) were selected treatment. No available treatment was identified. Treatment facilities were CAI and HWTF. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)</p>	<p>CAI/Thermal Desorption PSTP-CPV-3.1.4/3.1.5 CAI - Submit schedule for operations for mixed waste treatment 03/31/98 Thermal Desorption - Commence operations 02/02/01</p>	<p>FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes a delay in treatment by delaying operation of the CAI until 03/31/98, or if the CAI is not the chosen option, delay until 02/02/01 for treatment in the thermal desorption skid.</p>

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFCAgreement	Schedules For Alternatives Identified in the PSTP	Comments
1. Gas cylinders D001 hydrogen	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	21.08 (0.6 m ³)	<p>Selected treatment was not identified. Available treatment was incineration. Treatment facilities were CAI and offsite capabilities. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95.</p> <p>These gas cylinders are the cylinders remaining after the completion of the gas cylinder work-off plan (GAS 100)</p>	<p>Gas-Scrubbing Skid or Gas Oxidation Skid PSTP-CPV-3.1.9 or 3.1.10</p> <p>Gas-Scrubbing Skid - Commence operations 05/10/02</p> <p>Gas Oxidation Skid - Commence operations 05/10/02</p>	<p>FFCAgreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes a delay in treatment because the gas skids are scheduled to commence operations 05/10/02.</p>
2. Gas cylinders D001 ignitable gases	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	63.43 (1.8 m ³)	<p>Selected treatment was not identified. Available treatment was incineration. Treatment facilities were CAI and offsite capabilities. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95.</p> <p>These gas cylinders are the cylinders remaining after the completion of the gas cylinder work-off plan (GAS 100)</p>	<p>Gas-Scrubbing Skid or Gas-Oxidation Skid PSTP-CPV-3.1.9/3.1.10</p> <p>Gas-Scrubbing Skid - Commence operations 05/10/02</p> <p>Gas-Oxidation Skid - Commence operations 05/10/02</p>	<p>FFCAgreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes a delay in treatment because the gas skids are scheduled to commence operation 05/10/02.</p>

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFC Agreement	Schedules For Alternatives Identified in the PSTP	Comments
<p>3. Ignitable liquids D001 ignitable chemical reagents, scintillation vials</p>	<p>Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)</p>	<p>2800.54 (79.31 m³)</p>	<p>Selected treatment was incineration and DETOX (chemical oxidation). No available treatment was identified. Treatment facilities were CAI, HWTF, and offsite capabilities. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)</p>	<p>Off-Site Thermal Treatment PSTP-CPV-3.1.1 Contract procured (DSSD); complete shipping waste 12/30/96</p>	<p>FFCAgreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule may constitute a delay in treatment because it schedules completion of shipping the waste off-site for treatment by 12/30/96.</p>
<p>17. Spent solvents F001 1,1,1-trichloroethane, trichloroethylene, methylene chloride, chlorinated fluorocarbons</p>	<p>Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)</p>	<p>312.49 (8.85 m³)</p>	<p>Selected treatment was incineration and DETOX (chemical oxidation). No available treatment was identified. Treatment facilities were CAI and HWTF. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)</p>	<p>CAI/Evaporative Oxidation PSTP-CPV-3.1.4/3.1.3 CAI - Submit a schedule for operations for mixed waste treatment 03/31/98 Evaporative Oxidation - Commence operations 03/17/99</p>	<p>FFCAgreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes a delay in treatment by delaying operation of the CAI until after 03/31/98, or if the CAI is not the chosen option, until 03/17/99 when operation of the evaporative oxidation skid begins.</p>

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFC Agreement	Schedules For Alternatives Identified in the PSTP	Comments
18. Spent solvents F002 1,1,1-trichloroethane, trichloroethylene	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	449.21 (12.72 m ³)	Selected treatment was incineration and DETOX (chemical oxidation). No available treatment was identified. Treatment facilities were CAI and HWTF. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)	CAI/Evaporative Oxidation PSTP-CPV-3.1.4/3.1.3 CAI - Submit a schedule for operations for mixed waste treatment 03/31/98 Evaporative Oxidation - Commence operations 03/17/99	FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes a delay in treatment by delaying operation of the CAI until after 03/31/98, or if the CAI is not the chosen option, until 03/17/99 when operation of the evaporative oxidation skid begins.
19. Spent solvents F003 acetone, methanol, xylene	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	570.59 (16.16 m ³)	Selected treatment was incineration and DETOX (chemical oxidation). No available treatment was identified. Treatment facilities were CAI and HWTF. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)	CAI/Evaporative Oxidation (PSTP-CPV-3.1.4/3.1.3 CAI - Submit a schedule for operations for mixed waste treatment 03/31/98 Evaporative Oxidation - Commence operations 03/17/99	FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes delay of treatment by delaying operation of the CAI until after 03/31/98, or if the CAI is not the chosen option, until 03/17/99 when operation of the evaporative oxidation skid begins.

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFCAgreement	Schedules For Alternatives Identified in the PSTP	Comments
20. Spent solvents F005 benzene, pyridine, toluene	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	381.43 (10.8 m ³)	Selected treatment was incineration and DETOX (chemical oxidation). No available treatment was identified. Treatment facilities were CAI and HWTF. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Bench-scale testing of the DETOX skid will be completed in early FY95 (per AR 100, July 28, 1994)	CAI/Evaporative Oxidation PSTP-CPV-3.1.4/3.1.3 CAI - Submit a schedule for operations for mixed waste treatment 03/31/98 Evaporative Oxidation - Commence operations 03/17/99	FFCAgreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes delay of treatment by delaying operation of the CAI until after 03/31/98, or if the CAI is not the chosen option, until 03/17/99 when operation of the evaporative oxidation skid begins.
22. Chemical products U-wastes unspecified	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	Less than 125.89 (less than 3.57 m ³)	Selected treatment was incineration. No available treatment was identified. Treatment facilities were CAI and offsite capabilities. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95.	CAI/Evaporative Oxidation PSTP-CPV-3.1.4/3.1.3 CAI - Submit a schedule for operations for mixed waste treatment 03/31/98 Evaporative Oxidation - Commence operations 03/17/99	FFCAgreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes delay of treatment by delaying operation of the CAI until after 03/31/98, or if the CAI is not the chosen option, until 03/17/99 when operation of the evaporative oxidation skid begins.

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFC Agreement	Schedules For Alternatives Identified in the PSTP	Comments
23. Gas cylinders P-wastes unspecified	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	Less than 20.09 (less than 0.57 m ³)	No selected treatment was identified. Available treatment was incineration. Treatment facilities were CAI and offsite capabilities. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95.	Gas-scrubbing Skid PSTP-CPV-3.1.9 or Mixed Wastes Requiring Further Characterization for Which Technology Assessment Has Not Been Done PSTP-CPV-3.3 Gas-Scrubbing Skid - Commence operations 05/10/02 Technology assessment has not been done - Complete determination of treatment options 12/30/98	FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes delay of treatment by delaying treatment until the gas-scrubbing skid begins operation 05/10/02, or until a technology assessment is completed by 12/30/98.
24. Gas cylinders U-wastes unspecified	Table 2 - Low-Level Liquid and Gaseous Mixed Wastes (7/18/94)	Less than 21.24 (less than 0.6 m ³)	No selected treatment was identified. Available treatment was incineration. Treatment facilities were CAI and offsite capabilities. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95.	Mixed Wastes Requiring Further Characterization or for Which Technology Assessment Has Not Been Done PSTP-CPV-3.3 Technology assessment has not been done - Complete determination of treatment options 12/30/98	FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. The PSTP treatment schedule constitutes delay of treatment by delaying treatment until a determination of the treatment options is completed by 12/30/98.

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFC Agreement	Schedules For Alternatives Identified in the PSTP	Comments
<p>6. Decontamination waste F001, F002 1,1,1-trichloroethane, methylene chloride, chlorinated fluorocarbons</p>	<p>Table 3 - Transuranic Solid Mixed Wastes (7/18/94)</p>	<p>9758.81 (276.4 m³)</p>	<p>Selected treatment was incineration. No available treatment was identified. Treatment facility was the CAI. Treatment in the CAI was scheduled to begin soon after completion of the trial burn scheduled for 02/13/95. Treatment of combustible TRU waste would commence after the TRU waste work-off plan (TRU 100) had been developed within 26 months of the issuance of the final WIPP WAC for the operational phase.</p>	<p>Shipment to WIPP PSTP-CPV-4.0</p> <p>Provided WIPP opens in 1998, LANL's TRU certification program to the WIPP WAC will be completed by a planned date of one year after the WIPP WAC for the final disposal phase is issued</p>	<p>FFC Agreement schedule was to begin treatment in the CAI soon after the 02/13/95 trial burn under interim status unless the NMED placed additional regulatory requirements on the unit pertaining to radioactive waste incineration. Combustible TRU waste could be burned in the CAI as identified by the TRU waste work-off plan (TRU 100) which was scheduled to be completed by 26 months after the issuance of the final WIPP WAC for the operational phase. The PSTP schedule is to ship the combustible TRU waste to WIPP, which appears to bypass treatment.</p>
<p>1. Dioxins F027 pentachlorophenol</p>	<p>Table 4 - Hazardous Wastes (7/18/94)</p>	<p>8.01 (0.23 m³)</p>	<p>No selected treatment was identified. Available treatment was incineration. Treatment facilities were CAI and offsite capabilities</p>	<p>PSTP does not address hazardous wastes, only mixed wastes. No provisions have been made for managing these wastes</p>	<p>This waste was shipped to the Aptus Incinerator for disposal in FY94 (per the Annual Report, AR 100, July 28, 1994)</p>

TABLE 1. IMPACT OF CAI DELETION

Waste Stream	Reference Table	Total Volume of Waste (ft ³)	Treatment Technologies and Treatment Schedules in the FFC Agreement	Schedules For Alternatives Identified in the PSTP	Comments
TSCA wastes - radioactively contaminated PCB liquids including bulk liquids and capacitors	LANL PCB Program, ESH-19 (4/12/95)	44 55-gallon drums in storage now; expect 50+ drums over next several years	The CAI has a TSCA permit to treat PCB contaminated wastes	No other technologies have been identified	Off-site capacity does not exist. ORNL is permitted for incinerating PCBs but it does not accept off-site wastes. Proposed rules for the disposal of PCBs (12/6/94) provides for the ability to obtain one-year extensions to the one year storage limit. LANL will likely have to apply for a one year extension, annually until it develops or identifies a viable treatment or disposal option and implements it.