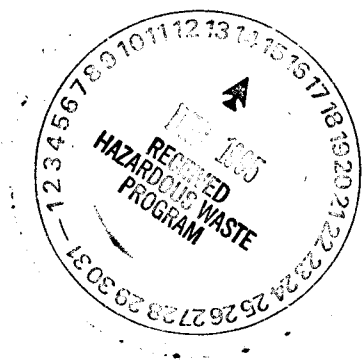




Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

Jim S —



Red LANK FFO/90-95

Benito Garcia, Director
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

Dear Mr. Garcia:

This letter is to notify the New Mexico Environment Department (NMED) of DOE and the Los Alamos National Laboratory's (LANL) intent to utilize the Oak Ridge National Laboratory's (ORNL) Toxic Substances Control Act (TSCA) incinerator for treatment of a number of candidate waste streams (see attached letter). NMED's success in working out a state equity agreement with the State of Tennessee is critical to our plan to cost-effectively treat and dispose of mixed waste.

ORNL included LANL on their Site Treatment Plan (STP) and have briefed the State of Tennessee that LANL intends to ship waste to their facility. We have identified approximately 20 percent of our legacy waste for shipment to this facility, pending your agreement with the State of Tennessee.

The benefit of pursuing the ORNL TSCA incinerator are as follows:

- The ORNL TSCA incinerator can accept higher alpha limits which commercial facilities cannot.
- It is extremely cost-effective to the taxpayer and DOE to utilize the ORNL TSCA incinerator based on their per unit volume costs.
- TSCA would reduce the need to build some of the mobile treatment units, which will also save money for the taxpayer and DOE.

The waste management budget has again been cut for the LANL site. We believe that the funding level allows us to pursue an aggressive treatment/disposal action plan. However, the funding isn't sufficient to pursue dual paths of technology development and actual treatment/disposal, our priority is to fund actual treatment/disposal activities. Since DOE and LANL plan to pursue this treatment option, it is necessary to ensure that while NMED is working on this equity issue, we are given relief from the milestones



HL

Benito Garcia

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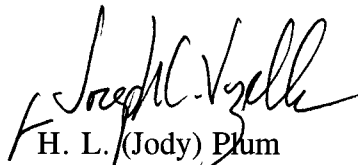
identified for these waste streams. If you are unsuccessful in negotiating state equity issues with Tennessee, we will renegotiate the milestones for these waste streams with you and will look for other options at that time. We look forward to working with you to achieve our goals of mixed waste reduction and leading the rest of the DOE complex for reduced mixed waste volumes.

In addition to the candidate waste streams identified in the attached letter, we believe that the additional waste streams are also viable candidates. We have begun conversations with our counterparts in Tennessee and they seem receptive to the idea. As you begin state equity negotiations, please include electroplating waste in your discussions. We will follow up with you in the next 60 days to confirm this information.

We are aggressively pursuing this disposal option. Our plan is to ship these materials in the October 1996 March 1997 time frame. It is critical to the success of our plan that you successfully complete state equity issues at the earliest possible time.

If we can be of any assistance or provide you with additional information, please contact either Jody Plum, Office of Environment and Projects, at 665-5042; or Paul Schumann, LANL, at 667-5840.

Sincerely,



H. L. (Jody) Plum
Office of Environment and Projects, LAAO

LAAMEP:7JN-005



Paul Schumann
LANL

Attachment



Department of Energy

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

DEC 11 1995

A. L. Rivera
Building K-1037, MS-7357
Lockheed Martin Energy Systems
P. O. Box 2003
Oak Ridge, Tennessee 37831-7357

Dear Mr. Rivera:

Subject: Solicitation of Expression of Interest by the Department of Energy (DOE) Facilities Considering Use of the Oak Ridge Reservation Toxic Substances Control Act (TSCA) Incinerator (DOE Oak Ridge Operations Office Letter Dated November 3, 1995)

The Department of Energy, Los Alamos Area Office and the Los Alamos National Laboratory are pleased to submit a written response to you in compliance with the subject letter. The waste streams identified for shipment to the Oak Ridge TSCA incinerator are liquids which include non-regulated radioactively contaminated waste as well as TSCA and/or RCRA-regulated radioactively contaminated waste. Additionally, we have identified solids which are low-level mixed waste for incineration at the Oak Ridge TSCA incinerator.

If our waste is found to be suitable and acceptable for incineration and subsequent disposal, we would like to know all the details that we must comply with for the waste shipment to actually happen.

If you require any additional information, please contact me at (505) 667-0573, or fax (505) 665-0872; or Juan Corpion, CST-5 Group Leader, at (505) 667-7579, or fax (505) 665-3961. Thank you for your consideration.

Sincerely,

151

LAAMEP:2JN-037

James G. Nunz, Mixed Waste Manager
Office of Environment and Projects
Los Alamos Area Office

Juan Corpion, Group Leader
CST-5, Los Alamos National Laboratory

Enclosure:
Compliance Plan Volume

cc:
See page 2

CONCURRENCES
RTG SYMBOL
NAME
DATE

LAAMEP:jfg

JNunz

12/11/95

A. L. Rivera

2

cc w/enclosure:

M. Devaurs, EM/WM, LANL, MS-J552

B. Vocke, EM/V&R, LANL, MS-J591

M. Williams, WMD, AL

J. Grimm, WMD, AL

cc w/o enclosure:

J. Vozella, AAMEP, LAAO

R. Murphy, CST-5, LANL, MS- J593

K. Goyal, CST-5, LANL, MS-J593

PART A

Site: Los Alamos National Laboratory

Field/Operations

Office: DOE Los Alamos Area Office (DOE-LAAO)

DOE Contact Name: James Nunz

Mailing Address: 528 35th Street

Phone No.: (505) 667-0573

Los Alamos, NM 87544

Fax No.: (505) 665-4872

Site Contact Name: Juan Corpion

Mailing Address: P.O. Box 1663, MS J593

Phone No.: (505) 667-7579

Los Alamos National Laboratory

Fax No.: (505) 665-3961

Los Alamos, NM 87545

PART B**Questionnaire RCRA-LLW and RCRA-PCB-LLW Was**

1. Is your site considering the TSCA Incinerator as a treatment option for RCRA-LLW and/or RCRA-PCB-LLW wastes?

Considering: ☒ Yes ☐ No

Planning to Consider: ☒ Yes ☐ No

Interested: ☒ Yes ☐ No

- 2(a). Did your site submit a proposed site treatment plan under the Federal Facility Compliance Act of 1992?

☒ Yes ☐ No

- 2(b). If yes, please provide the name and address of the state organization developing the order.

New Mexico Environmental Department, Harold Runnels Building

1190 St. Francis Drive, P.O. Box 26110

Santa Fe, NM 87502

3. Does your site treatment plan include enforceable milestones for the TSCA Incinerator as the preferred or alternate treatment option?

Preferred treatment option ☐ Yes ☒ No

Alternate treatment option ☐ Yes ☒ No

If Yes, please attach the list of milestones.

4. Does your site treatment plan include non-enforceable targets for the TSCA Incinerator as the preferred or alternate treatment option?

Preferred treatment option ☐ Yes ☒ No

Alternate treatment option ☐ Yes ☒ No

If Yes, please attach the list of targets and dates.

5. Please provide a list of applicable MWIR numbers for RCRA-LLW and RCRA-PCB-LLW waste streams.

The following STP database information is presented according to the priority ranking:

1. IPA Wastes, LA-W901, 15.89 cubic meters, meet reg. 09/30/96, complete ship 12/30/96.
2. Scintillation Fluids, LA-W902, 0.63 cubic meters, meet reg. 09/30/96, complete ship 12/30/96.
3. Aqueous Organic liquids, LA-W906, 1.65 cubic meters, permit application amend 12/30/96, system test 06/19/99 complete treatment 02/09/00.
4. Halogenated organic liquids, LA-W907, 16.58 cubic meters.
5. Non-halogenated organic liquids, LA-W908, 14.34 cubic meters.
6. Bulk oils, LA-W909, 3.75 cubic meters.
7. PCB wastes with RCRA components, LA-W910, 0.74 cubic meters.
8. Organic contaminated combustible solids, LA-W911, 28.32 cubic meters, permit application 11/16/98, system testing 12/01/01, complete treatment 02/14/02.
9. Combustible debris, LA-W912, 13.82 cubic meters, permit application 01/04/98, system testing 02/01/00, complete treatment 08/25/00.

PART C Questionnaire for PCB-LLW Wastes

1(a). Is your site considering the TSCA Incinerator as a treatment option for PCB-LLW incinerable liquids and solids?

Considering: ☒ Yes ☐ No

Planning to Consider: ☒ Yes ☐ No

Interested: ☒ Yes ☐ No

1(b). If yes, please provide a copy of the December 31, 1994, Annual PCB Report to EPA in two formats—hard copy and electronic copy on a diskette compatible with Microsoft, FoxPro, Excel, or Access.

If possible, please identify any of the reported waste inventory that either (1) has been reported in the mixed waste inventory report and the site treatment plan under the Federal Facility Compliance Act (i.e., is also regulated under RCRA) or (2) is *not* low-level radioactive waste.

2. Please describe the current low-level radioactive PCB waste management status at the site.

- _____ a. The site does not generate, store, or dispose of PCB waste.
- _____ b. The site is in full compliance with the one-year disposal requirements for PCB waste set forth in 40 CFR 761.65.
- X c. The site is storing low-level radioactive PCB waste pending availability of treatment capacity.
- _____ d. DOE is considering development of an FFCA for the site to address low-level radioactive PCB waste stored for longer than one year.
- _____ e. DOE and EPA are in the process of negotiating an FFCA for the site to address low-level radioactive PCB waste stored for longer than one year. The projected date for issue of the FFCA is: _____
- _____ f. DOE has signed an FFCA with EPA for the site which addresses low-level radioactive PCB waste stored for longer than one year.
- _____ g. Other (please describe). _____

Please attach any additional information relevant to the status listed above (e.g., any available information on anticipated future waste generation rates).

3. Physical forms and incinerable solids categories for PCB-LLW.

Incinerable category	Inventory 12/31/94 (kg)	Generation projection (kg/year)
Liquids PCB + Non-PCB MWIR and Non-MWIR related	81.45 cubic meters	
Combustible solids MWIR related only	42.14 cubic meters	
Combustible sludges		
Noncombustible solids		
Noncombustible sludges		
Soils		

PART D General Comments

Is there any other waste that you would like considered for treatment in the ORR TSCAI?

1. PCB - Low Level Waste, no MWIR number, 4.52 m³ or 4214 kg.
2. Other: Rad oil, non PCB, non RCRA liquid, 23.35 cubic meters, 19432 kg.

**NMED/DOE/LANL KICKOFF MEETING ON
SITE TREATMENT PLAN IMPLEMENTATION
December 15, 1995
PROPOSED AGENDA**

**1. FUTURE IMPLEMENTATION OF OFF-SITE SHIPMENT
PROGRAM FOR LLMW**

Request to revise STP to remove requirement for pre-approved
revision prior to off-site shipments

Background on accelerated shipment program

2. RECLASSIFICATION OF TA-50 TREATMENT SLUDGE

3. COVERED MATTERS - MISCELLANEOUS ISSUES

4. NEXT MEETING

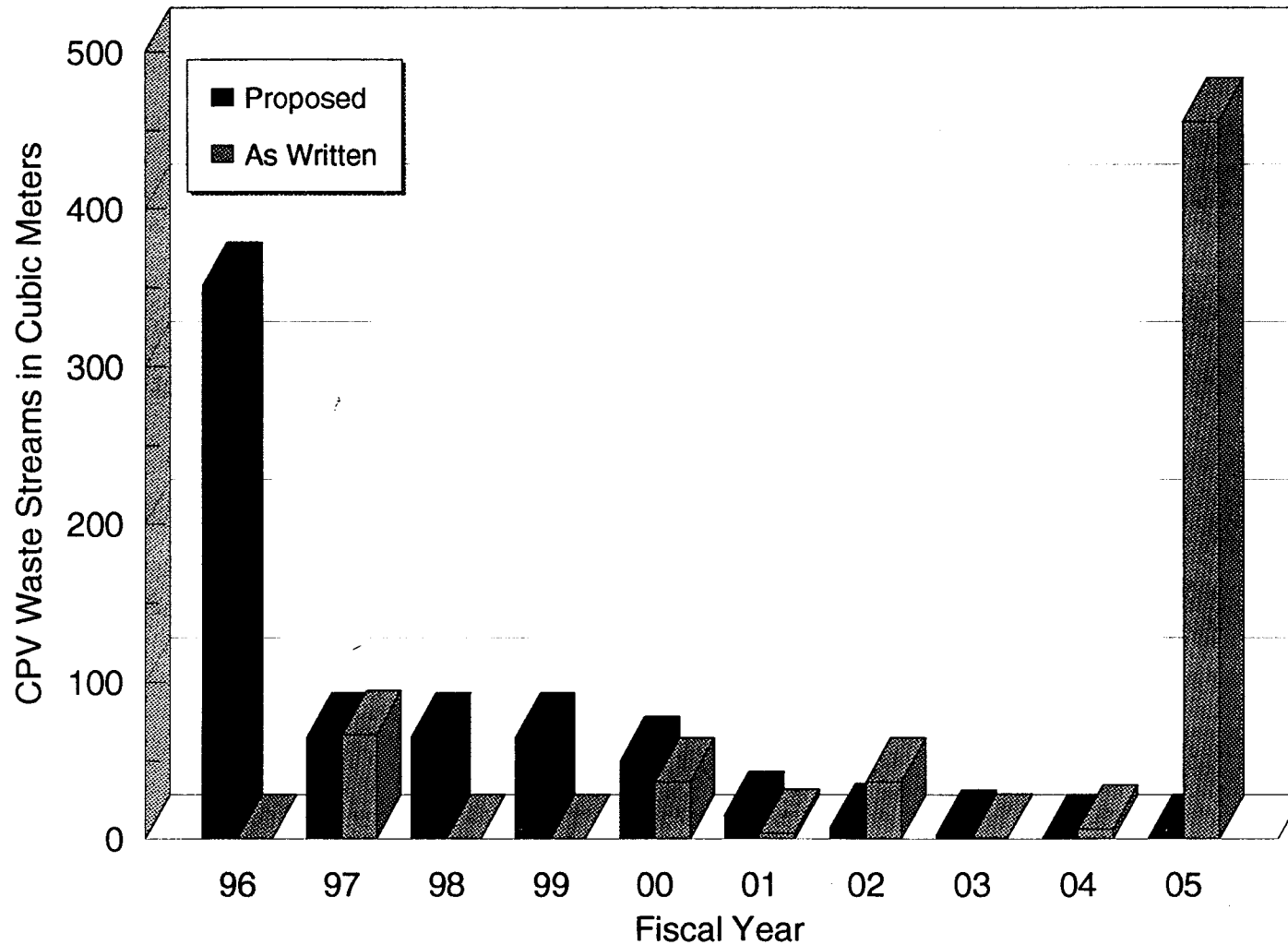
FY 96 Activities

- 1) Treatment sludges – complete position paper to declassify
- 2) 98m³ of mixed waste shipped off-site
- 3) Characterize and prepare 18m³ for FY 97
- 4) Submit INEL free lead letter
- 5) Submit waste streams for ORNL TSCA
- 6) Continue sort, survey and decon operations
- 7) Shipped scintillation fluids in late FY 95
- 8) Ship the pyrophoric uranium chips to SEG

Treatment and/or Disposal of Waste Streams

DOE Facilities \ Waste Streams	3.1.1	3.1.2	3.1.3	3.1.4	3.1.5	3.1.6	3.1.7	3.1.8	3.1.9	3.1.10	3.2.1	3.3	3.4.1	3.4.2
Hanford		X	X			X					X			
INEL	X	X	X	X		X					X			
ORNL	X		X	X		X					X	X		
SRS	X		X	X		X					X			
LANL							X	X	X	X		X	X	X
NTS														
Comm. Fac.														
DSSI	X		X								X			
Envirocare		X			X						X		X	X
SEG						X	X							
Allied Tech.						X	X							
Catholic Univ.						X	X							
NFS										X				
ETSC								X	X			X		

Proposed vs. Written STP



Total STP Volume per CPV = 605 Cubic Meters