

PUBLIC NOTICE

March 6, 1996

On October 4, 1995, the New Mexico Environment Department (NMED) issued a Federal Facility Compliance Order (FFCO) requiring compliance by the United States Department of Energy (DOE) and the Regents of the University of California with a Site Treatment Plan (STP) for the treatment of mixed waste at the Los Alamos National Laboratory (LANL) pursuant to the New Mexico Hazardous Waste Act (HWA), NMSA 1978, §§ 74-4-1 et seq. (Repl. Pamp. 1993) and Section 3021(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6939(c), as amended by the Federal Facility Compliance Act of 1992, Pub. L. 102-386, 106 Stat. 1505 (1992) (FFC Act). Under Section X. Revisions of the FFCO, all proposed or required revisions shall be available for public review and comment. LANL has proposed that language in the STP be revised to "(1) add off-site treatment as a parallel preferred option to all STP treatability categories in which it is not currently prescribed as such, and (2) eliminate the requirement for pre-approval of off-site shipments by NMED for all covered waste not listed in Section 3.1.1 and 3.1.2 of the STP. The existing notification requirements would be retained, with changes, and all shipments will be reported in Annual Updates according to current STP requirements." A copy of the proposed revisions will be made available for public review and written comment for thirty (30) days beginning March 15, 1996 at the following locations:

Hazardous and Radioactive Materials Bureau
2044 Galisteo, Building A
Santa Fe, New Mexico 87505
Contact: Stella Montoya 505-827-1558

District One - Albuquerque Headquarters
4131 Montgomery Blvd., N.E.
Albuquerque, New Mexico 87109
Contact: Adela Padilla 505-841-9472

Farmington Field Office
724 W. Animas
Farmington, New Mexico 87401
Contact: Dave Tomko 505-327-9851

District Three - Las Cruces Headquarters
1001 N. Solano Drive
Las Cruces, New Mexico 88001
Contact: Yolanda Benavidez 505-524-6300

District Four - Roswell Headquarters
1914 W. Second Street
Roswell, New Mexico 88201
Contact: John Hoover 505-624-6046

Written comments to:

Jim Seubert, WRES I
Hazardous and Radioactive Materials Bureau
2044 Galisteo
Santa Fe, NM 87505



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1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN VOLUME

1.1 Introduction

On October 6, 1992, Congress passed the Federal Facility Compliance Act (FFC Act) to address compliance by the United States Department of Energy (DOE) with the land disposal restrictions (LDR) for the storage of mixed waste set forth in Section 3004(j) of RCRA. The FFC Act requires the DOE to submit a Site Treatment Plan (STP) for developing treatment capacities and technologies to treat all of the facility's mixed waste, regardless of the time generated, to the standards promulgated pursuant to Section 3004(m) of RCRA. The FFC Act provides that the appropriate regulatory authority, the New Mexico Environment Department (NMED), may approve, approve with modifications or disapprove the STP. Prior to making such a determination, NMED is required by FFC Act to provide public notice, consider public comments, consult with the Environmental Protection Agency (EPA) and any other state in which a facility affected by the STP is located.

On March 31, 1995, DOE submitted its proposed STP to NMED for the treatment of mixed waste at the Los Alamos National Laboratory (LANL). On April 17, 1995, the public was given notice of and an opportunity to comment to NMED on the draft STP submitted by DOE. After considering public comment and otherwise complying with the FFC Act, NMED determined to approve the draft STP with modifications as provided in this document.

The STP is intended to fulfill the requirements of the FFC Act and establish an enforceable framework to allow DOE and the Regents of the University of California (Respondents) to achieve full compliance with LDR requirements under the New Mexico Hazardous Waste Act (HWA) and RCRA. The compliance dates set forth herein are enforceable time periods in which Respondents are required to develop treatment capacities and technologies, and treat or otherwise meet the requirements set forth for LDR under the HWA and RCRA. The STP will be fully implemented by a Compliance Order issued by NMED on or before October 6, 1995.

1.2 Contents

The STP contains two volumes and is intended to bring Respondents into compliance with LDR storage prohibitions under the HWA and RCRA. The Compliance Plan Volume of the STP provides overall schedules, including compliance dates, for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL. The Compliance Plan includes a schedule for the submittal of applications for permits, construction of treatment facilities,

technology development, off-site transportation for treatment, and the treatment of mixed wastes in full compliance with the HWA and the implementing regulations at 20 NMAC 4.1, which incorporates by reference 40 CFR Parts 260 through 270. The Background Volume of the STP contains progress reports as required in the Compliance Order. Respondents shall carry out the activities described in the STP, including the Compliance Plan Volume of the STP, in accordance with the schedules and requirements set forth in the STP and the Order.

2.0 Compliance Schedules

The STP provides overall schedules for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL. The schedules include those activities required to bring existing waste treatment technologies into operation, process backlogged and currently generated waste, include schedules required to develop new facilities and capacity for treatment and establish an overall time frame for achieving compliance with the LDR requirements under the HWA and 20 NMAC 4.1.

2.1 Categories of Activities for Compliance Dates

The categories of activities for which compliance dates will be provided for different types of treatment approaches in the STP are listed in the tables below. The categories of activities are based on Section 3021(b)(1)(B)(I), (ii), and (iii) of the RCRA, to the extent appropriate.

2.1.1 Plans Where Treatment Technology Exists

For most of the mixed waste, treatment technologies have been identified and developed. For the waste that will be treated on-site, the categories of activities for compliance dates identified in Table I shall apply. Compliance dates for the activities identified in Table I may be found in Section 3.1.

Table I. Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies.

A.	Submit permit applications to the NMED.
B.	Initiate construction as specified in the NMED permit.
C.	Complete system testing and commence operation.
D.	Begin treating mixed waste.
E.	Complete treatment of existing wastes to applicable regulatory standards.

2.1.2 Plans Where Technology Must Be Developed

For some mixed waste, no treatment technologies have been identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated on-site, the categories of activities for compliance dates are identified in Table II and shall apply. Compliance dates for the activities identified in Table II may be found in Section 3.2.

Table II. Categories of Activities for Compliance Dates for Mixed Waste Without Existing Treatment Technologies.

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| <ul style="list-style-type: none">A. Identify and develop technology.B. Submit permit application to NMED; orC. Submit a Notification of Intent to perform treatability study to NMED a minimum of 45 days prior to commencement of the study.D. Initiate construction as specified in the NMED.E. Commence systems testing.F. Begin treating mixed waste.G. Complete treatment of existing wastes to applicable regulatory standards. |
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2.1.3 Requirements Pertaining to Radionuclide Separation

The FFC Act sets additional requirements in cases in which DOE intends to conduct radionuclide separation of mixed waste. Should the DOE determine to do radionuclide separation of such mixed waste, DOE will schedule specific compliance dates based on category activities identified in Table III. "Radionuclide separation" shall mean segregating the radioactive portion of the mixed waste from the hazardous portion of the mixed waste.

Table III. Categories of Activities for Compliance Dates for Radionuclide Separation of Mixed Waste

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|---|
| <ul style="list-style-type: none">A. Complete an estimate of the volume of waste generated by each case of radionuclide separation.B. Complete an estimate of the volume of waste that would exist or be generated without radionuclide separation.C. Complete an estimate of the costs of waste treatment and disposal if radionuclide separation is used compared with the estimated costs if it is not used.D. Provide the assumptions underlying such estimates of waste volumes and cost estimates.E. Provide characterization methodologies for determining waste type.F. Submit a plan for treating or managing hazardous waste residues, accompanied by a NMED permit application. |
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2.1.4 Plans for Mixed Waste to be Shipped Off-site for Treatment

Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within ~~fourteen (14)~~ thirty (30) working days after confirmation of receipt of a shipment date with at the affected off-site facility. ~~DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.~~

Table IV. Activities for Mixed Waste to be Shipped Off-Site for Treatment

- ~~A. Request necessary approval from NMED for shipment of waste.~~
- A. B. Meet all regulatory requirements for off-site shipment
- B. C. Provide documentation to NMED that waste has been received at an off-site facility for treatment, disposal or storage pending treatment or disposal.

2.1.5 Plans Related to Other Mixed Waste Activities

1. Activities other than the types of activities specifically called for in the FFC Act as requiring schedules are described in this STP. Some of these activities may be associated with schedules which may contain compliance dates related to treatment of the DOE's mixed waste.
2. For mixed waste which is not sufficiently characterized to allow identification of appropriate treatment, notification of the characterization of such waste shall be in accordance with the annual update process described in the Compliance Order. If such characterization results in the addition or deletion of a treatability group or an increase in volume in a treatability group, a revision would be required pursuant to Section X of the Compliance Order.

3.0 LOW-LEVEL MIXED WASTE STREAMS

This section presents proposed schedules for treatment technologies and the preferred options to treat low-level mixed waste streams (LLMW) at LANL. All preferred options not described below must be approved by NMED in accordance with the revision process pursuant to the Compliance Order.

3.1 Mixed Waste Streams for Which Technology Exists

The following subsections summarize LLMW treatability groups for which technology exists.

3.1.1 Commercial Off-site Treatment by Thermal Treatment

Treatability Group(s):

LLMW for Commercial Thermal Treatment (MWIR Treatment ID DS-S001)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
IPA wastes	LA-W901	D001, D009, F002, F003, F005	104	15.89
scintillation fluids	LA-W902	D001, F003, F005	18	2.47
Totals			122	18.36

Treatment Technology:

The waste will be treated at an off-site commercial facility that combusts organic liquid waste.

Activity	Compliance Dates
A. Meet all regulatory requirements prior to shipping waste	9/30/96
B. Complete shipping waste	12/30/96
C. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.1.2 Commercial Off-site Treatment by Stabilization or Macroencapsulation

Treatability Group(s):

LLMW for Commercial Stabilization

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (M ³)
lead blankets	LA-W903	D007, D008	4	0.74
soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	59	10.53
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	36	39.32
Totals			99	50.59

Treatment Technology:

The waste will be treated at an off-site commercial facility that stabilizes or macroencapsulates wastes.

Activity	Compliance Dates
A. Meet all regulatory requirements prior to shipping waste	05/30/97
B. Complete shipping waste	09/30/97
C. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.1.3 Evaporative Oxidation (MWIR Treatment ID GJ-S801C)

Treatability Group(s):

LLMW for Evaporative Oxidation/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
aqueous organic liquids	LA-W906	D001, D002, D005, D007, D008, D010, D018, D019, D022, D027, D028, D030, D032, D033, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	45	1.65
Totals			45	1.65

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within ~~fourteen (14)~~ thirty (30) working days after confirmation of receipt of a shipment ~~date with~~ at the affected off-site facility. ~~DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.~~

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	12/30/96
B. Initiate construction	As specified in the NMED permit.
C. Complete system test and commence operation and begin treating mixed waste	6/19/99
D. Complete treatment of existing wastes to applicable regulatory standards	2/09/00

3.1.4 Thermal Desorption (MWIR Treatment ID GJ-S801B)

LLMW for Thermal Desorption/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
organic-contaminated combustible solids	LA-W911	D001, F001, F002, F003, F005	307	28.32
Totals			307	28.32

LLMW for Thermal Desorption

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D027, D030, D032, D033, D034, D042, D043, F001, F002, F004, F005	80	7.82
Totals			80	7.82

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within ~~fourteen (14)~~ **thirty (30)** working days after confirmation of receipt of a shipment ~~date with~~ at the affected off-site facility. ~~DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.~~

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	11/16/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	02/01/01
D. Complete treatment of existing wastes to applicable regulatory standards	02/14/02

3.1.5 Macroencapsulation (MWIR Treatment ID PX-S803)

Treatability Group(s):

LLMW for Macroencapsulation/Off-site treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
combustible debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	83	13.82
Totals			83	13.82

LLMW for Macroencapsulation

Treatability group		RCRA codes	Number of items	Net volume (m3)
activated or inseparable lead	LA-W921	D008	74	15.60
noncombustible debris	LA-W922	D001, D004, D005, D006, D007, D008, D009, D010, D011	41	5.62
Totals			115	21.22

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify

the NMED Project Manager in writing as soon as possible and in any event within ~~fourteen (14)~~ thirty (30) working days after confirmation of receipt of a shipment ~~date with~~ at the affected off-site facility. ~~DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.~~

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	01/04/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operation and begin treating mixed waste	02/01/00
D. Complete treatment of existing wastes to applicable regulatory standards	08/25/00

3.1.6 Chemical Plating Waste Treatment Skid (MWIR Treatment ID LA-S004)

Treatability Group(s):

LLMW for Chemical Plating Waste Skid/Off-site Treatment (preferred option)?

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
aqueous wastes with heavy metals	LA-W913	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011	203	1.85
corrosive solutions	LA-W914	D001, D002	162	1.36
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	15	0.13
Totals			380	3.34

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to

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treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within ~~fourteen (14)~~ thirty (30) working days after confirmation of receipt of a shipment ~~date with~~ at the affected off-site facility. ~~DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.~~

Activity	Compliance Dates
A. Resubmit revised permit application to NMED	10/30/96
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	03/17/00
D. Complete treatment of existing wastes to applicable regulatory standards	05/08/01

3.1.7 Water-reactive Metals Treatment Skid (MWIR Treatment ID LA-S003)

Treatability Group(s):

LLMW for Water-Reactive Metals Skid/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
water-reactive wastes	LA-W916	D001, D003	78	6.03
Totals			78	6.03

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within thirty (30) working days after confirmation of receipt of shipment at the affected off-site facility.

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	06/30/01
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	09/09/03
D. Complete treatment of existing wastes to applicable regulatory standards	04/21/04

3.1.8 Gas-scrubbing Skid (MWIR Treatment ID LA-S801)

Treatability Group(s):

LLMW for Gas-Scrubbing Skid/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	13	0.35
Totals			13	0.35

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within thirty (30) working days after confirmation of receipt of shipment at the affected off-site facility.

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	03/10/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	05/10/02
D. Complete treatment of existing wastes to applicable regulatory standards	08/28/03

3.1.9 Gas Oxidation Skid (MWIR Treatment ID LA-S801)

Treatability Group(s):

LLMW for Gas Oxidation Skid/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
compressed gases requiring oxidation	LA-W918	D001	6	0.08
Totals			6	0.08

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within thirty (30) working days after confirmation of receipt of shipment at the affected off-site facility.

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	03/10/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	05/10/02
D. Complete treatment of existing wastes to applicable regulatory standards	08/28/03

3.1.10 Mercury Amalgamation (MWIR Treatment ID PI-S801)

Treatability Group(s):

LLMW for Amalgamation/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
elemental mercury	LA-W920	D006, D009, F005	45	0.50
Totals			45	0.50

Treatment Technology

The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site. Shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within thirty (30) working days after confirmation of receipt of shipment at the affected off-site facility.

Activity	Compliance Dates
A. Submit permit application, amendment or modification to NMED	01/30/98
B. Initiate construction	As specified in the NMED permit
C. Complete system testing and commence operations and begin treating mixed waste	06/05/00
D. Complete treatment of existing waste to applicable regulatory standards	11/15/00

3.2 Mixed Waste Streams for Which Technology Requires Adaptation or for Which No Technology Exists

The following subsections summarize mixed waste streams for which technology requires adaptation or for which no technology exists.

3.2.1 Hydrothermal Processing

Treatability Group(s):

LLMW for Hydrothermal Processing/Off-site Treatment (preferred option)

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
halogenated organic liquids	LA-W907	D001, D002, D003, D007, D009, D018, D019, D022, D028, D029, D035, D043, F001, F002, F003, F005, U077, U080, U226, U227, U228, U236	385	16.58

nonhalogenated organic liquids	LA-W908	D001, D002, D003, D004, D007, D008, D009, D011, D018, D038, D040, F002, F003, F004, F005, U002, U019, U169, U188, U220, U246	275	14.34
bulk oils	LA-W909	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	28	3.75
PCB wastes with RCRA components	LA-W910	D008, D039, F002	4	0.74
Totals			692	35.41

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
inorganic solid oxidizers	LA-W923	D001, D003, D005	55	0.20
Totals			55	0.20

Treatment Technology:

The preferred destruction treatment technology option for this treatability group is Hydrothermal Processing which is a technology that needs development for adaptation to treat radioactive and PCB-bearing waste. This treatment technology is being adapted at LANL and is expected to be developed into a mobile treatment unit. The GJPO schedule for deployment of the unit indicates its possible availability to LANL after February 2002. Shipment off-site for treatment is a parallel preferred option. Respondents shall submit treatment schedules and selected options as a revision for NMED's approval by November 30, 1998.

3.3 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done (MWIR Treatment ID LA-S701)

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m3)
lead wastes - TBD	LA-W924	D003, D008	186	51.44
mercury wastes - TBD	LA-W925	D007, D008, D009, F001	63	18.30
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	10	1.25
biochemical laboratory wastes	LA-W927	D001, D003	9	1.34
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	1288	268.17
Totals			1556	340.50

Treatment Technology:

The following steps will be taken to properly characterize this waste:

- Conduct additional generator interviews
- Prepare a sampling plan for waste not adequately characterized
- Conduct sampling and analysis
- Determine treatment options

Activity	Compliance Dates
A. Complete generator interviews	10/30/95
B. Complete sampling and analysis plan	1/30/96
C. Complete sampling and analysis	9/30/98
D. Complete determination of treatment options	12/20/98

3.4 Plans for Other Types of Activities

The following subsection summarizes plans for other types of activities.

3.4.1 Lead Decontamination (MWIR Treatment ID LA-S001)/Off-site Treatment (preferred option)

Treatability Group(s):

Treatability group	MWIR waste ID	Net volume (m3)	Preferred option
lead for surface contamination	LA-W930	56.20	lead decontamination trailer
Totals		56.20	

Treatment Technology:

Lead bricks and shapes will be decontaminated for recycle in an on-site decontamination trailer. The trailer is on-site and has operated, but needs an upgrade for prolonged operation. Shipment off-site for treatment or recycling is a parallel preferred option. Should DOE decide to treat or recycle this waste at an off-site facility in lieu of plans to treat such waste on-site, the DOE shall

notify the NMED Project Manager in writing as soon as possible and in any event within thirty (30) working days after confirmation of shipment to the affected off-site facility.

Activity	Compliance Date
complete lead decontamination	09/30/97

Lead shapes and forms not amenable to processing using the decontamination trailer.

Activity	Compliance Date
provide schedule for development of lead processing techniques and options	06/30/96

3.4.2 Sorting, Surveying, and Decontamination (MWIR Treatment ID GJ-S804)

Treatability Group(s):

Treatability group	MWIR waste ID	Number of items	Net volume (m3)
nonradioactive or suspect waste items to be surveyed	LA-W929	1250	14.24
Totals		1250	14.24

Treatment Technology:

This field operation will survey waste suspect of radioactive contamination to determine whether it is radioactively contaminated. The work will be done on-site with equipment and staffing provided by another DOE-site. Waste determined not to be radioactively contaminated will be treated using commercial facilities permitted to treat hazardous waste.

Activity	Compliance Dates
complete survey	10/30/96

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.

DOE shall request approval from NMED for off-site treatment in accordance with the revision process pursuant to the Compliance Order.

Activity	Compliance Date
A. Development of treatment technologies	June 30, 1999
B. Submit permit application amendment or modification to NMED for treatment of MTRU	December 31, 1999
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.