



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502



Philip E. Batt, Governor

April 15, 1996

Benito J. Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
P.O. Box 26110
Santa Fe, New Mexico 83702

Re: DOE/LANL Proposal for Mixed Low-Level Waste Shipments to INEL for Treatment

Dear Mr. Benito Garcia:

The DEQ has considered DOE/LANL's proposal to ship mixed low-level waste identified in the INEL STP Table 4.4 and generated at Los Alamos National Laboratory in New Mexico. The DEQ concurs with your proposal to modify the DOE/LANL Site Treatment Plan (STP) for DOE/LANL to ship the cited waste to the Idaho National Engineering Laboratory (INEL) for treatment upon satisfying the following conditions.

All wastes proposed for treatment in DOE-ID/INEL units must have completed INEL "669 Forms," which supply detailed characterization data to determine ultimate compatibility of the wastes with selected INEL units. The completed forms will enable DOE-ID officials to certify to DEQ that the wastes are acceptable for treatment. To our knowledge, DOE/LANL has not returned any completed 669 forms to DOE-ID officials.

Certain Los Alamos waste streams designated in the INEL STP may require additional approval in the event DOE determines pre- or post-treatment storage beyond a six-month time frame is necessary. For those waste streams listed in the INEL STP Table 4.4 targeting existing operating facilities such as WERF and WROC, and not requiring pre- or post-treatment storage beyond a six-month time frame, no additional approval is required. However, DOE-ID will be expected to notify DEQ and provide detailed information prior to the receipt of any off-site waste.

Presently, DOE-ID is developing a protocol for management of waste residuals following treatment at INEL. The State of Idaho will stipulate that all off-site waste be fully treated within six (6) months of entering the state and must exit the state within six (6) months following treatment, unless an exemption from this requirement is specifically approved by DEQ.

According to the INEL STP, Los Alamos plans to send 286 cubic meters of stored mixed waste and 122 cubic meters of future generated mixed waste. Approximately 46% (132 m³) of the stored waste and 74% (91³ m) of the future generated waste at Los Alamos are planned for treatment at the INEL Advanced Mixed Waste Treatment Facility (AMWTF). The AMWTF is a non-existing facility. No definitive schedules for shipment to INEL or treatment of Los Alamos mixed waste in the facility have been made available to the State of Idaho by DOE.



1778

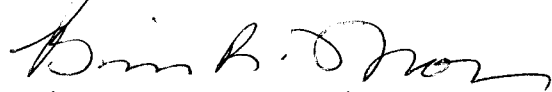
Recd LANL FF0196

72

Mr. Garcia
April 15, 1996
Page 2

Please include language in your revision to DOE/LANL's STP to have INEL and DEQ notified of any pending shipments of waste prior to shipment. Please direct any questions or concerns concerning this letter to Rensay Owen at (208) 528-2650.

Sincerely,



Brian R. Monson, Chief
Operating Permits Bureau
Permits and Enforcement

BRM/RO/ra MONSON\LTRS\GARCIA.LTR

cc: Don Rasch, DOE-ID
Joel Case, DOE-ID
Rensay Owen, EIRO
Source File
COF