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

JAN 13 1997

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Janice Archuleta
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street, Building A
P. O. Box 26110
Santa Fe, NM 87505

Dear Ms. Archuleta:

Subject: Site Treatment Plan (STP) FY 1995 Annual Update, Los Alamos National Laboratory (LANL), Lead Volumes

The purpose of this letter is to allow the Department of Energy (DOE) and the University of California (UC) to (1) present the addendum requested by the New Mexico Environment Department (NMED) by letter dated July 15, 1996, regarding our discussion of lead volumes in the referenced March 31, 1996 LANL STP FY 1995 *Annual Update*; (2) provide requested changes to Table 2-1 of the FY 1995 LLMW Inventory Update Summary; and (3) propose additional corrections to the covered waste volume information in the *Annual Update*, as discussed below. We apologize for our tardiness in responding. Each item is addressed below, and in the enclosures to this letter.

1. Addendum on Changes to Lead Inventory

In Item no. 1 of your July 15, 1996 letter, you requested additional information to allow NMED to proceed with its approval of the LANL STP FY 1995 *Annual Update.* Specifically, you requested an addendum which *"...would give a clearer picture of the reason for the inventory changes reflected in Table 2-1; especially those line items under 'CPV Section(s) 3.1.5, 3.4.1, 3.4.2, and none.'"*

Following careful review of this request, and after assembling the responsive information, it was determined that rather than an addendum, it would be more appropriate for the administrative record, and more useful to readers of this to provide substituted text for Section 2.1.1 and Table 2-1 rather than an addendum (see Enclosures A and B).

In reference to the "*...inventory changes reflected in Table 2-1; especially those line items under 'CPV Section(s) 3.1.5, 3.4.1, 3.4.2, and none,'*" specific explanations are as follows:

- CPV Section 3.1.5 (MWIR LA-W921): The change in inventory for this treatability group, *Activated or Inseparable Lead,* is due to the return of unsuccessfully decontaminated lead to the inventory (see Enclosure A);

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- CPV Section 3.4.1 (MWIR LA-W930): The change in inventory for this treatability group, *Lead for Surface Decontamination,* resulted because much of the sorted lead wastes were reassigned to this treatability group, since they may be decontaminated using processes other than the lead decontamination trailer;

- CPV Section 3.4.2 (MWIR LA-W929): The change in inventory for this treatability group, *Nonradioactive or Suspect Waste Items to be Surveyed,* because this project resulted in very small changes in inventory volume as shown in Table 2-1, but due to rounding, the total volume did not show a change (since these values are reported to two decimal places);

- CPV Section "none" (MWIR LA-W931): The treatability group, *Lead Requiring Sorting,* is discussed in Section 2 of this letter.

New page 19 in Enclosure A provides replacement text regarding the inventory changes in Table 2-1 of the FY 1995 LLMW Inventory Update Summary specific to the CPV Sections listed in your letter. It explains in more detail the reasons for both actual and apparent changes to the lead inventory prior to October 1, 1995. These were due primarily to LANL's lead decontamination project, which was implemented in response to LANL's Federal Facility Compliance Agreement (FFC Agreement). This text is presented in underline/strikeout format for your information and review. Enclosure B provides the actual replacement pages 12 through 19a of the Background Volume FY 1995 *Annual Update* in clean copy format, for inclusion in the public review copies of the document.

2. Modification to Table 2-1 Column Title

In Item no. 1 of your July 15, 1996 letter, you also requested a slight modification to this table to indicate "*...Background Volume Specified Treatability Groups in addition to the listed 'CPV Section' Treatability Groups.*"

New page 18 of Table 2-1 in Enclosure A changes the title for the first column of the table for the treatability group *Lead Requiring Sorting* (MWIR LA-W931) only, since this is the only treatability group discussed in the STP Background Volume but not the CPV (we believe this was due only to an oversight). Enclosure A presents the changes in underline/strikeout format for your information and review. Enclosure B provides the actual replacement pages 12 through 19a of the Background Volume FY 1995 *Annual Update* in clean copy format, for inclusion in the public review copies of the document.

3. Other Corrections to Table 2-1

During our review, we identified several typographical errors in the original Table 2-1. Although the overall covered waste volume totals listed in Table ES-1 are correct, the following changes to Table 2-1 are proposed:

- An increase of 0.32 m3 was incorrectly assigned to treatability group LA-W913 (CPV Section 3.1.6). This group actually experienced no changes during FY 1995, and thus should have shown "NC" in covered waste inventory, and a covered waste volume at the end of FY 1995 of 1.85 m3. The 0.32 m3 increase actually occurred in treatability group LA-W923 (CPV Section 3.2.1; see below);

- An increase of 0.02 m3 (and a decrease of 0.0003 m3) in treatability group LA-W915 (CPV Section 3.1.6) was inadvertently omitted from Table 2-1, changing the covered waste volume at the end of FY 1995 to 0.15 m3;

- An increase of 0.32 m3 which actually occurred in treatability group LA-W923 (CPV Section 3.2.1) was incorrectly assigned to treatability group LA-W913 (CPV Section 3.1.6; see above). This group (LA-W923) actually should have shown a covered waste volume at the end of FY 1995 of 0.52 m3.

Enclosure A presents these changes to Table 2-1 in underline/strikeout format for your information and review. Enclosure B provides the actual replacement pages 12 through 19a of the Background Volume FY 1995 *Annual Update* in clean copy format, for inclusion in the public review copies of the document.

4. Need for and Timing of Revision

In your July 15, 1996 letter, you commented that the changes discussed herein should require a revision to the STP. In accordance with the approach presented in our October 29, 1996 FFCO amendment request, we suggest that since these changes require no modifications to existing STP compliance dates, rather than submitting a separate revision for these minor volume changes at this time, DOE/UC offers to present a revision request incorporating all changes in covered waste volumes as of the end of FY 1996, when it submits its FY 1996 Annual Update no later than March 31, 1997.

A certification statement is enclosed (Enclosure C). Again, we apologize for the delay in our response and hope it did not cause you inconvenience. If there are any questions regarding the information presented in this letter, please contact me at (505) 665-5042.

Sincerely,

H. L. "Jody" Plum
STP Project Manager
Office of Environment and Projects

LAAMEP:3JP-030

Enclosures

cc w/o enclosures:
B. Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street, Building A
P . O. Box 26110
Santa Fe, NM 87505

CERTIFICATION

I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.

Kenneth M. Hargis

Kenneth M. Hargis
Environmental Management
Waste Managment Program
Manager of Operations
Los Alamos National Laboratory

11/22/96
Date Signed

H.L. Plum
Regulatory Permitting and Compliance Manager
Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator

Date Signed

ENCLOSURE A

SUGGESTED REPLACEMENT PAGES FOR LANL STP BACKGROUND VOLUME UPDATE (PAGES 12-19a)

(Underline/strikeout version)

(Note: In this document, existing language to be struck is presented in strike-through format, while proposed replacement language is underlined)

Table 2-1. FY95 LLMW Inventory Update Summary

CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.1.1	**LA-W901 IPA Wastes**	15.89	NC[b]		15.89	0.0
3.1.1	**LA-W902 Scintillation Fluids**	2.47	Decreased 2.24	Shipped to Diversified Scientific Services, Inc. (DSSI) before issuance of the FFCO	0.23	0.0
3.1.2	**LA-W903 Lead Blankets**	0.74	NC		0.74	0.0
3.1.2	**LA-W904 Soil with Heavy Metals**	10.53	NC		10.53	21.0
3.1.2	**LA-W905 ER Soils**	39.32	NC		39.32	0.0
3.1.3	**LA-W906 Aqueous Organic Liquids**	1.65	Increased 0.43	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	2.08	16.0

CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.1.4	**LA-W911 Organic-Contaminated Combustible Solids**	28.32	Decreased 0.11 Increased 0.17	Shipped to Grand Junction Projects Office (GJPO) for treatability study prior to issuance of FFCO Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	28.38	6.5
3.1.4	**LA-W919 Organic-Contaminated Noncombustible Solids**	7.82	Decreased 0.11 Increased 0.001	Shipped to GJPO for treatability study prior to issuance of FFCO Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	7.71	44.4
3.1.5	**LA-W912 Combustible Debris**	13.82	NC		13.82	22.2

CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.1.5	**LA-W921 Activated or Inseparable Lead**	15.60	Decreased 7.42 Increased 10.11	Processed in lead decontamination effort in accordance with EPA FFCAgreement Milestone LD200, before issuance of FFCO Received from LD200 lead decontamination effort (refer to text in Section 2.1.1)	18.29	44.4
3.1.5	**LA-W922 Noncombustible Debris**	5.62	Decreased 0.0002 Increased 1.25	Shipped to GJPO for treatability study prior to issuance of FFCO Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	6.87	28.4
3.1.6	**LA-W913 Aqueous Wastes with Heavy Metals**	1.85	~~Increased 0.32~~ NC	~~Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory~~	1.85	0.6
3.1.6	**LA-W914 Corrosive Solutions**	1.36	Increased 0.04	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	1.40	0.2

CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.1.6	**LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates**	0.13	Decreased 0.0003 Increased 0.02	Shipped to GJPO for treatability study prior to issuance of FFCO Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	~~0.13~~ 0.15	0.2
3.1.7	**LA-W916 Water-Reactive Wastes**	6.03	Increased 0.02	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	6.05	0.0
3.1.8	**LA-W917 Compressed Gases Requiring Scrubbing**	0.35	NC		0.35	0.0
3.1.9	**LA-W918 Compressed Gases Requiring Oxidation**	0.08	NC		0.08	0.5
3.1.10	**LA-W920 Elemental Mercury**	0.50	NC		0.50	7.5
3.2.1	**LA-W907 Halogenated Organic Liquids**	16.58	Increased 0.04	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	16.62	0.9

Red line?

Redline ignore?

CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.2.1	**LA-W908 Nonhalogenated Organic Liquids**	14.34	Increased 0.08	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	14.42	10.7
3.2.1	**LA-W909 Bulk Oils**	3.75	NC		3.75	10.6
3.2.1	**LA-W-910 PCB Wastes with RCRA Components**	0.74	NC		0.74	0.0
3.2.1	**LA-W923 Inorganic Solid Oxidizers**	0.20	Increased 0.32	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	~~0.20~~ 0.52	0.0
3.3	**LA-W924 Lead Wastes–TBD**	51.44	Decreased 11.28	Processed in lead decontamination effort in accordance with EPA FFCAgreement Milestone LD200, before issuance of FFCO	40.16	0.0
3.3	**LA-W925 Mercury Wastes–TBD**	18.30	NC		18.30	0.0
3.3	**LA-W926 Compressed Gases–TBD**	1.25	NC		1.25	0.0

Redline
ignore

CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.3	**LA-W927 Biochemical Laboratory Wastes**	1.34	NC		1.34	0.0
3.3	**LA-W928 Dewatered Treatment Sludge**	268.17	NC		268.17	0.0
3.4.1	**LA-W930 Lead for Surface Decontamination**	56.20	Decreased 14.64 Increased 22.50	Processed in lead decontamination effort in accordance with EPA FFCAgreement Milestone LD200, before issuance of FFCO Received from LD200 lead decontamination effort (refer to text in Section 2.1.1)	64.06	71.3
3.4.2	**LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed**	14.24	Decreased 0.002 Increased 0.00002	Decontaminated and released as material, in accordance with the EPA FFCAgreement Milestone LD200 Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	14.24	0.0

Background Volume Specified Treatability Groups in Addition to Listed CPV Section Treatability Groups

BV ~~CPV~~ Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.4.3 ~~None~~[c]	**LA-W931 Lead Requiring Sorting**	9.97	Decreased 4.58	Processed in lead decontamination effort in accordance with EPA FFCAgreement Milestone LD200, before issuance of FFCO	11.12	0.0
			Increased 5.73	Received from LD200 lead decontamination effort (refer to text in Section 2.1.1)		

[a]These changes in covered waste volume are based on work off and corrections to data error.
[b]NC means No Change during FY95 in the covered waste (refer to the text for additional information).
[c]This treatability group (LA-W931, Lead Requiring Sorting) is not listed in the CPV; however, it is discussed in Section 3.4.3 of the BV.

ENCLOSURE B

SUGGESTED REPLACEMENT PAGES FOR LANL STP BACKGROUND VOLUME UPDATE (PAGES 12-19a)

(Clean text version)

Table 2-1. FY95 LLMW Inventory Update Summary

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3.1.2	**LA-W903 Lead Blankets**	0.74	NC		0.74	0.0
3.1.2	**LA-W904 Soil with Heavy Metals**	10.53	NC		10.53	21.0
3.1.2	**LA-W905 ER Soils**	39.32	NC		39.32	0.0
3.1.3	**LA-W906 Aqueous Organic Liquids**	1.65	Increased 0.43	Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	2.08	16.0

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CPV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
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3.3	**LA-W928 Dewatered Treatment Sludge**	268.17	NC		268.17	0.0
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3.4.2	**LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed**	14.24	Decreased 0.002 Increased 0.00002	Decontaminated and released as material, in accordance with the EPA FFCAgreement Milestone LD200 Waste in inventory before October 1, 1994, that was inadvertently omitted from STP inventory	14.24	0.0

Background Volume Specified Treatability Groups in Addition to Listed CPV Section Treatability Groups

BV Section	MWIR Waste ID and Treatability Group	CPV Volume (m^3)	Change in *Covered Waste* Inventory (m^3)[a]	Comments	Covered Vol. End of FY95 (m^3)	Projection FY96-FY00 (m^3)
3.4.3[c]	**LA-W931 Lead Requiring Sorting**	9.97	Decreased 4.58	Processed in lead decontamination effort in accordance with EPA FFCAgreement Milestone LD200, before issuance of FFCO	11.12	0.0
			Increased 5.73	Received from LD200 lead decontamination effort (refer to text in Section 2.1.1)		

[a]These changes in covered waste volume are based on work off and corrections to data error.
[b]NC means No Change during FY95 in the covered waste (refer to the text for additional information).
[c]This treatability group (LA-W931, Lead Requiring Sorting) is not listed in the CPV; however, it is discussed in Section 3.4.3 of the BV.

Prior to the issuance of the FFCO, LANL was decontaminating lead in accordance with the FFCAgreement milestone LD200. LANL successfully completed the LD200 milestone and removed over 140,000 pounds of lead from the LLMW inventory. This lead decontamination effort was conducted in two campaigns, the first of which was completed in early 1995 and the second was conducted between July and September, 1995. The first campaign focused on drums of lead waste that were acceptable for decontamination in the lead decontamination trailer and the second focused on any lead bricks in inventory when the FFCAgreement was signed (March, 1994).

During the second campaign, drums potentially containing lead bricks were opened to examine the drum contents, even if the drum contents were not primarily lead bricks. If one or more lead bricks were found, they were removed to be decontaminated. The remaining contents of these drums were sorted into physical forms, such as lead pigs, lead sheets, lead shot/shavings, odd lead pieces, etc., recontainerized, and returned to storage as mixed waste. The sorting effort was completed by September 30, 1995; however, due to processing time for the paperwork, some of the drums were not received at TA-54 for long-term storage until November 29, 1995. In addition, lead waste which was unsuccessfully decontaminated was returned for long-term storage at TA-54; this lead waste will require a different treatment such as macroencapsulation and disposal. Some lead product also was returned to TA-54 even though it was successfully decontaminated.

To ensure that the lead waste that was processed in the LD200 lead decontamination effort and returned to long-term storage is assigned to the proper treatability groups, all of these waste items were removed from the treatability groups initially assigned in the STP CPV, as shown in Table 2-1. For instance, unsuccessfully decontaminated lead bricks were assigned to LA-W921, *Activated or Inseparable Lead,* and LA-W931, *Lead Requiring Sorting*. Much of the sorted lead wastes were assigned to LA-W930, *Lead for Surface Decontamination* because they may be decontaminated through other processes than the lead decontamination trailer. Similarly, the lead waste returned from the first campaign, which was not sorted, was removed from the initial treatability groups and was re-assigned to the treatability group LA-W924, *Lead TBD.* For the treatability group LA-W929, *Nonradioactive or Suspect Waste Items to be Surveyed,* this effort resulted in very small changes in inventory volume as shown in Table 2-1, but due to rounding, the total volume did not show a change (since these values are reported to two decimal places).

Table 2-1 reports a small apparent net increase (0.42 m^3) in the volume of lead waste shown, even though over 140,000 pounds of lead was removed from the LLMW inventory prior to FY96 due to LANL's LD200 lead decontamination project. This apparent increase in volume resulted from the sorting operations. Many of the legacy drums were packed full while in storage at TA-54, and contained over 2,000 pounds of lead waste each when removed for decontamination. However, current transportation requirements limit the maximum weight of a 55-gal. drum to 800 pounds. Therefore,

when unsuccessfully decontaminated lead bricks were repacked and returned to TA-54, they were received (and recorded in inventory) as full drums containing 55 gal. (0.208m^3 of waste), even though the drums were now only one-third full. Therefore, the volume is reported in Table 2-1 as showing an apparent increase, even though the actual quantity of lead waste did not increase.

2.1.2 MTRU Inventory Summary

The MTRU covered waste inventory at LANL is summarized in Table 2-2. The table shows the volumes of MTRU covered waste for each treatability group. After the enactment of the Federal Facility Compliance Act (FFCAct) in 1992, efforts were made to identify all mixed waste in storage at the Laboratory. Because much of the TRU inventory was generated prior to the existence of the Resource Conservation and Recovery Act (RCRA) regulations, identification of MTRU as a subset of TRU necessarily relied largely on existing records. As stated in Section 1.5.1 of the STP BV, until recently, the best available data for MTRU was published in the April 1993 Interim MWIR which was used to provide the MTRU waste inventory data in Section 4.1 of the STP BV. While as much as possible of the MTRU and potential MTRU was identified early on to fulfill FFCAct reporting requirements, a more in depth study of the inventory has taken place in the last two years, resulting in a more conservative assumption of the processes generating the waste, and thus, the identification of more potential MTRU. As better process knowledge becomes available, it is being incorporated into the LANL TRU waste database. Therefore, differences in total MTRU inventory between Table 2-2 and the MTRU waste inventory data in Section 4.1 of the STP BV are due in part to better knowledge of the legacy MTRU inventory since the Interim MWIR report was published.

Prior to the issuance of the FFCO, LANL was decontaminating lead in accordance with the FFCAgreement milestone LD200. LANL successfully completed the LD200 milestone and removed over 140,000 pounds of lead from the LLMW inventory. This lead decontamination effort was conducted in two campaigns, the first of which was completed in early 1995 and the second was conducted between July and September, 1995. The first campaign focused on drums of lead waste that were acceptable for decontamination in the lead decontamination trailer and the second focused on any lead bricks in inventory when the FFCAgreement was signed (March, 1994).

During the second campaign, drums potentially containing lead bricks were opened to examine the drum contents, even if the drum contents were not primarily lead bricks. If one or more lead bricks were found, they were removed to be decontaminated. The remaining contents of these drums were sorted into physical forms, such as lead pigs, lead sheets, lead shot/shavings, odd lead pieces, etc., recontainerized, and returned to storage as mixed waste. The sorting effort was completed by September 30, 1995; however, due to processing time for the paperwork, some of the drums were not received at TA-54 for long-term storage until November 29, 1995. In addition, lead waste which was unsuccessfully decontaminated was returned for long-term storage at TA-54; this lead waste will require a different treatment such as macroencapsulation and disposal. Some lead product also was returned to TA-54 even though it was successfully decontaminated.

To ensure that the lead waste that was processed in the LD200 lead decontamination effort and returned to long-term storage is assigned to the proper treatability groups, all of these waste items were removed from the treatability groups initially assigned in the STP CPV, as shown in Table 2-1. For instance, unsuccessfully decontaminated lead bricks were assigned to LA-W921, *Activated or Inseparable Lead*, and LA-W931, *Lead Requiring Sorting*. Much of the sorted lead wastes were assigned to LA-W930, *Lead for Surface Decontamination* because they may be decontaminated through other processes than the lead decontamination trailer. Similarly, the lead waste returned from the first campaign, which was not sorted, was removed from the initial treatability groups and was re-assigned to the treatability group LA-W924, *Lead TBD*. For the treatability group LA-W929, *Nonradioactive or Suspect Waste Items to be Surveyed*, this effort resulted in very small changes in inventory volume as shown in Table 2-1, but due to rounding, the total volume did not show a change (since these values are reported to two decimal places).

Table 2-1 reports a small apparent net increase (0.42 m^3) in the volume of lead waste shown, even though over 140,000 pounds of lead was removed from the LLMW inventory prior to FY96 due to LANL's LD200 lead decontamination project. This apparent increase in volume resulted from the sorting operations. Many of the legacy drums were packed full while in storage at TA-54, and contained over 2,000 pounds of lead waste each when removed for decontamination. However, current transportation requirements limit the maximum weight of a 55-gal. drum to 800 pounds. Therefore,

when unsuccessfully decontaminated lead bricks were repacked and returned to TA-54, they were received (and recorded in inventory) as full drums containing 55 gal. (0.208m^3 of waste), even though the drums were now only one-third full. Therefore, the volume is reported in Table 2-1 as showing an apparent increase, even though the actual quantity of lead waste did not increase.

~~Prior to the issuance of the FFCO, LANL was decontaminating lead in accordance with the FFCAgreement Milestone LD200. LANL successfully completed the LD200 Milestone. There is a small net increase (0.42 m^3) in the volume of lead waste in Table 2-1, even though over 140,000 lb of lead was removed from the LLMW inventory prior to FY96 due to LANL's lead decontamination project.~~

~~Drums potentially containing lead bricks were opened to examine the drum contents. If one or more lead bricks were found, they were removed to be decontaminated. The remaining contents of these drums were sorted into physical forms, such as lead pigs, lead sheets, lead shot/shavings, odd lead pieces, etc., recontainerized, and returned to storage as mixed waste. In addition, lead waste which was unsuccessfully decontaminated was returned for long-term storage at TA-54; this lead waste will require a treatment such as macroencapsulation and disposal. Some lead product also was returned even though it was successfully decontaminated. All of these waste items were removed from the treatability groups initially assigned in the STP CPV, as shown in Table 2-1. This lead waste, as it is a covered waste, was then assigned to the applicable treatability groups, shown as additions in Table 2-1.~~

2.1.2 MTRU Inventory Summary

The MTRU covered waste inventory at LANL is summarized in Table 2-2. The table shows the volumes of MTRU covered waste for each treatability group. After the enactment of the Federal Facility Compliance Act (FFCAct) in 1992, efforts were made to identify all mixed waste in storage at the Laboratory. Because much of the TRU inventory was generated prior to the existence of the Resource Conservation and Recovery Act (RCRA) regulations, identification of MTRU as a subset of TRU necessarily relied largely on existing records. As stated in Section 1.5.1 of the STP BV, until recently, the best available data for MTRU was published in the April 1993 Interim MWIR which was used to provide the MTRU waste inventory data in Section 4.1 of the STP BV. While as much as possible of the MTRU and potential MTRU was identified early on to fulfill FFCAct reporting requirements, a more in depth study of the inventory has taken place in the last two years, resulting in a more conservative assumption of the processes generating the waste, and thus, the identification of more potential MTRU. As better process knowledge becomes available, it is being incorporated into the LANL TRU waste database. Therefore, differences in total MTRU inventory between Table 2-2 and the MTRU waste inventory data in Section 4.1 of the STP BV are due in part to better knowledge of the legacy MTRU inventory since the Interim MWIR report was published.