



ENTERED

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

JAN 5 1 1997



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: Clarification, Section 3.1.1 of the Compliance Plan Volume of the Federal Facility Compliance Order (FFCO, October 4, 1995, as Revised)

The purpose of this letter is to respond to requests made in the New Mexico Environment Department's (NMED) letter dated January 15, 1997, same subject. You requested clarification of apparent discrepancies presented in our notification of completion of activities set forth in the Los Alamos National Laboratory (LANL) FFCO, by letter dated January 9, 1997.

In that letter, the Department of Energy (DOE) and the University of California (UC) notified you of completion of a December 18, 1996 off-site waste shipment, in accordance with Activity 3.1.1C in the Compliance Plan Volume (CPV, Exhibit A). This shipment was sent on December 18, 1996 and received on December 20, 1996 (see signed manifest copies enclosed). Our January 9, 1997 letter also provided notice of our completion of shipment of all covered wastes in MWIR IDs LA-W901 and LA-W902, listed in Section 3.1.1 of the CPV (Activity 3.1.1B), and, we stated, of all remaining activities in Section 3.1.1 of the CPV.

In your January 15, 1997 letter, you discussed our May 2, 1996, July 16, 1996, and January 9, 1997 shipment notifications, and indicated your concern that volumes listed in these shipments did not appear to represent the entire inventory listed in Section 3.1.1 of the CPV. After carefully reviewing our files and database, and rechecking waste items physically present in the LANL waste inventory, we have identified four main reasons for the apparent discrepancy, as follows:



REDLAN FFCO/97

7L

Ms. Janice Archuleta

2

1. A shipment of covered wastes was sent on April 19, 1996 to the Diversified Scientific Services, Inc. facility in Kingston, Tennessee, and received there on April 24, 1996. Due to an error in our internal communications and quality assurance process, you were not notified of this shipment previously. The shipment contained 48 drums of isopropyl alcohol (IPA) wastes in LA-W901 (having a volume of 9.99 cu. m.), and 2 drums of IPA waste without an MWIR ID number (0.36 cu.m.). The latter 2 drums of IPA waste were inadvertently omitted from the October 1995 CPV inventory. These wastes might not have had a treatment option if not shipped with the IPA waste items in LA-W901. Total volume of this shipment was 10.41 cu.m. (see signed manifest copies enclosed). Please regard this letter as our formal notification of the shipment.
2. In our July 16, 1996 notification letter, we incorrectly stated that 51 of the LA-W901 IPA waste items comprised our June 24, 1996 shipment. Our recent recheck confirmed that in actuality, this shipment of 51 drums (having a volume of 10.56 cu.m.) of covered waste consisted of 48 drums (9.99 cu.m.) of IPA waste (LA-W901), 2 drums (0.36 cu.m.) of liquid scintillation waste (LA-W902), and one drum of waste without an MWIR ID number (0.208 cu.m.). The one drum of IPA waste was apparently omitted from the October 1995 CPV inventory. This waste might not have had a treatment option if not shipped with the IPA waste items in LA-W901. We incorrectly reported the latter three items as being LA-W901 items. Please regard this letter as our formal correction of the previous notification of the shipment. We regret our unintentional oversight in not identifying and correcting the inaccuracies sooner.
3. Rigorous rechecks of our records and physical inventory have revealed that the 104th LA-W901 item (a 1-pint container) was repackaged, and bulked with other (non-LA-W901) alcohol wastes in 1991. Although the original item no longer exists in inventory as a discrete item, the associated volume (1 pint, or approximately 0.0005 cu.m.) is still on-site. We have now confirmed that as of December 18, 1996, the other 103 LA-W901 items physically present in the October 1995 CPV inventory, and the balance of the volume originally reported in the CPV (15.89 cu.m.), have been shipped offsite. Unfortunately, this repackaging/transfer was not detected during preparation of the March 1996 *Annual Update*. Please regard this letter as our formal correction of the previous information regarding this treatability group. We will formally request that this item and volume be transferred to another appropriate treatability group, such as LA-W908.
4. Please note that, taking these corrections into account, the total volumes shipped exceeded the reported totals in the October 1995 CPV inventory, due to minor inaccuracies in the LA-W901 and LA-W902 volumes originally reported in the database (as discussed in LANL's March 1996 *Background Volume Update*) and to repackaging of these wastes to meet shipping requirements.

JAN 31 1997

Ms. Janice Archuleta

3

Therefore, the total waste work-off in LA-W901 and LA-W902 represented by LANL's shipments to date is presented in the following table:

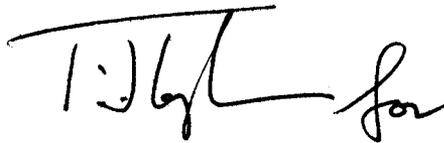
Shipment Received Date	Letter Date	LA-W901 Items	Vol.(m3)	LA-W902 Items	Vol.(m3)
9/28/95	5/2/96			15	2.24
4/24/96	none	48	9.99		
6/24/96	7/16/96	48	9.99	2	0.36
<u>12/20/96</u>	<u>1/9/97</u>	<u>7</u>	<u>0.021</u>	<u>1</u>	<u>0.004</u>
TOTALS		103	20.00	18	2.60

We regret our oversight in not identifying and correcting these inaccuracies sooner, and not notifying you sooner of the April 1996 shipment and the other corrections. This oversight was unintentional, and we are taking additional measures to improve our internal communications and quality assurance processes to ensure the accuracy of our shipment and inventory information in the future.

Documentation of each response is enclosed. Also enclosed is a Certification Statement. These documents were prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO.

DOE's and UC's records and documents related to this letter are available to NMED's staff upon request. Please contact me at (505) 665-5042 or Mr. Ken Hargis at (505) 667-2347, if you have any questions.

Sincerely,



H.L. "Jody" Plum
Office of Environment and Projects

LAAMEP:9JP-050

Enclosures

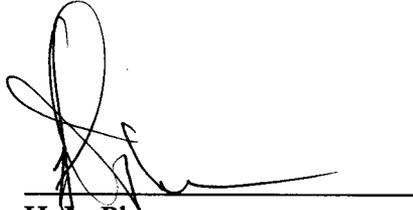
CERTIFICATION

**CLARIFICATION, SECTION 3.1.1 OF THE COMPLIANCE PLAN VOLUME OF
THE FEDERAL FACILITY COMPLIANCE ORDER (FFCO, OCTOBER 4, 1995,
AS REVISED)**

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
Manager of Operations
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator

1/30/97
Date Signed


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

1/30/97
Date Signed

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. NM0890010515		Manifest Document No. 96599	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address Los Alamos National Laboratory P.O. Box 1663, MS J593, Los Alamos, NM 87545 505 667-7579				A. State Manifest Document Number		B. State Generator's ID		
4. Generator's Phone		5. Transporter 1 Company Name FRI STATE MOTOR TRANSIT CO.		6. US EPA ID Number MOD095038998		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 800-742-1671		E. State Transporter's ID		
9. Designated Facility Name and Site Address DIVERSIFIED SCIENTIFIC SERVICES, INC. 657 GALLABER ROAD KINGSTON, TN 37767		10. US EPA ID Number TND982109142		F. Transporter's Phone		G. State Facility's ID		
				H. Facility's Phone (623-376-0084)				
GENERATOR	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers		13. Total Quantity	14. Unit W/Vol	15. Waste No.
				No.	Type			
	a.	WASTE FLAMMABLE LIQUIDS, CORROSIVE, I.C.S., 3, UN2924, 11, (ISOPROPYL ALCOHOL, POTASSIUM HYDROXIDE)		1	DR	24	P	0001 0007
	b.							
	c.							
d.								
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information 'EMERGENCY PHONE NO: (505) 667-6211' 11a. BRGNO: 132 AUTHORIZATION NO: DSSI-96-125				EMPT# 16528				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
Printed/Typed Name Dan Calkley				Signature <i>Dan Calkley</i>		Month Day Year 1/21/96		
17. Transporter 1 Acknowledgement of Receipt of Materials								
Printed/Typed Name Ray Landy				Signature <i>Ray Landy</i>		Month Day Year 1/21/96		
18. Transporter 2 Acknowledgement of Receipt of Materials								
Printed/Typed Name				Signature		Month Day Year		
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.								
Printed/Typed Name KALAN SHEFFIE				Signature <i>Kalan Sheffie</i>		Month Day Year 1/22/96		





Diversified Scientific Services, Inc.

657 Gallaher Road • Kingston, TN 37763 • (423) 375-0084 • FAX (423) 376-0087

ACKNOWLEDGMENT OF RECEIPT OF RADIOACTIVE WASTE

This is to certify that the radioactive material described below was received at the Diversified Scientific Services, Inc. (DSSI) facility in Kingston, Tennessee. This certification satisfies the requirements of Title 10 Code of Federal Regulations Part 20.311. This letter acknowledges receipt of the waste only. Waste analysis has not been completed. If any discrepancies exist after waste analysis is complete, you will be contacted by separate correspondence.

Auth. Number: DSSI-96-130

Manifest Number: 96599

Generator Name: Los Alamos National Laboratory

Address: P.O. Box 1663 MS J593
Los Alamos, NM 87545

Attn: Dan Oakley

Shipper: Tri State Motor Company

Date Received: December 20, 1996

Radiation Safety Officer (designee) Signature: [Signature] **date:** 12/20/96

Discrepancies (if any):

RECEIVED

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. NM0890010515	Manifest Document No. 96538	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Los Alamos National Laboratory P.O. Box 1663, MS J593, Los Alamos, NM 87545 505 667-7579			A. State Manifest Document Number		
4. Generator's Phone			B. State Generator's ID		
5. Transporter 1 Company Name TRI STATE MOTOR TRANSIT CO.		6. US EPA ID Number MO D095038998		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID	
9. Designated Facility Name and Site Address DIVERSIFIED SCIENTIFIC SERVICES, INC. 557 GALLAGER ROAD KINGSTON, TN 37767		10. US EPA ID Number TND982109142		G. State Facility's ID	
				H. Facility's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers	13. Total Quantity	14. Unit Wt/Vol
			No.	Type	
a.	x	HAZARDOUS FLAMMABLE LIQUID, N.O.S., 3, UN1993, 111, (TOLUENE, XYLENE), RQ(D001)	1	DM	457
b.	x	HAZARDOUS RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY, N.O.S., 7, UN2912, Liquid, ELEMENTAL, TH230 TH228 PU239 HP237 U234 PU238 TH232 U235 U236 H3, 3.43e-03 Ci, Fissile Excepted, LSA-II, RQ(D001)	1	DF	221
c.	x	HAZARDOUS RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY, N.O.S., 7, UN2912, Liquid, ELEMENTAL, AM241 C14 H3 HP237 PU238 PU239 TC99 TH228 TH230 U234, 4.21e-02 Ci, Fissile Excepted, LSA-II, RQ(D001)	1	DM	259
d.	x	HAZARDOUS RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY, N.O.S., 7, UN2912, Liquid, ELEMENTAL, AM241 C14 H3 HP237 PU238 PU239 TC99 TH228 TH230 U234, 3.22e-02 Ci, Fissile Excepted, LSA-II, RQ(D001)	1	DM	198
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
11b. 96-12-06-08085700 11c. 96-12-06-093437592 11d. 96-12-06-096075944 11b, 11c, 11d. "Exclusive use Shipment"			S.O. 192 12-T-10-10-10		
15. Special Handling Instructions and Additional Information					
EMERGENCY PHONE NO: (505) 667-6211 11a. ERGN: 128 11b. ERGIC: 152 11c. ERGNO: 162 11d. ERGNO: 162 AUTHORIZATION NO: DSSI-55-126					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Dan Oakley			Signature <i>Dan Oakley</i>		Month Day Year 12/18/96
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name FAY SANDER			Signature <i>Fay Sander</i>		Month Day Year 12/18/96
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name TRACON SHEFFIELD			Signature <i>Tracy Sheffield</i>		Month Day Year 12/20/96





Diversified Scientific Services, Inc.

657 Gallaher Road • Kingston, TN 37763 • (423) 376-0084 • FAX (423) 376-0087

ACKNOWLEDGMENT OF RECEIPT OF RADIOACTIVE WASTE

This is to certify that the radioactive material described below was received at the Diversified Scientific Services, Inc. (DSSI) facility in Kingston, Tennessee. This certification satisfies the requirements of Title 10 Code of Federal Regulations Part 20.311. This letter acknowledges receipt of the waste only. Waste analysis has not been completed. If any discrepancies exist after waste analysis is complete, you will be contacted by separate correspondence.

Auth. Number: DSSI-96-128

Manifest Number: 96538

Generator Name: Los Alamos National Laboratory

Address: P.O. Box 1663 MS J593
Los Alamos, NM 87545

Attn: Dan Oakley

Shipper: Tri State Motor Transit

Date Received: December 20, 1996

Radiation Safety Officer (designee) Signature: [Signature] **date:** 12/20/96

Discrepancies (if any):

RECEIVED JAN 2 1997

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NM0890010515		Manifest Document No. 96314		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address Los Alamos National Laboratory P.O. Box 1663, MS J593, Los Alamos, NM 87545						A. State Manifest Document Number				
4. Generator's Phone (505) 667-7579						B. State Generator's ID				
5. Transporter 1 Company Name TRI STATE MOTOR TRANSIT			6. US EPA ID Number MOD095038998			C. State Transporter's ID				
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone 800-742-1671				
9. Designated Facility Name and Site Address DIVERSIFIED SCIENTIFIC SERVICES, INC. P.O. BOX 863 657 Gallaher Road KINGSTON, TN 37767			10. US EPA ID Number TND982109142			E. State Transporter's ID				
						F. Transporter's Phone				
						G. State Facility's ID				
						H. Facility's Phone 216 4/19/96 423 615-376-0084				
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
						No.	Type			
a.	x	WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, PG III (ISOPROPANOL, 2-BUTANONE) RQ(D001)				50	DR	22,200	p	D001 D009 P001 P003 P005 FD02
b.										m 4/25/96
c.										
d.										
J. Additional Descriptions for Materials Listed Above 11a. Shipment ID # 96-0029						K. Handling Codes for Wastes Listed Above S01, S02, T01, T04				
15. Special Handling Instructions and Additional Information *EMERGENCY PHONE NO: (505) 667-6211* 11a. BRCNO: 27						EMTFF: 14474				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name DAN OAKLEY					Signature <i>Dan Oakley</i>			Month Day Year 10/11/96		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name Jack Brumby					Signature <i>Jack Brumby</i>			Month Day Year 10/11/96		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name					Signature			Month Day Year		
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										
Printed/Typed Name Tammy Monday					Signature <i>Tammy Monday</i>			Month Day Year 10/12/96		

GENERATOR

TRANSPORTER

FACILITY

TY





Diversified Scientific Services, Inc.

657 Gallaher Road • Kingston, TN 37763 • (423) 376-0084 • FAX (423) 376-0087

ACKNOWLEDGMENT OF RECEIPT OF RADIOACTIVE WASTE

This is to certify that the radioactive material described below was received at the Diversified Scientific Services, Inc. (DSSI) facility in Kingston, Tennessee. This certification satisfies the requirements of Title 10 Code of Federal Regulations Part 20.311. This letter acknowledges receipt of the waste only. Waste analysis has not been completed. If any discrepancies exist after waste analysis is complete, you will be contacted by separate correspondence.

Auth. Number: DSSI-96-029

Manifest Number: 96314

Generator Name: Los Alamos National Laboratory

Address: PO Box 1663
MS J593
Los Alamos, NM 87545

Attn: Dan Oakley

Shipper: TSMT

Date Received: April 24, 1996

Radiation Safety Officer (designee) Signature: [Signature] date: 4/24/96

Discrepancies (if any):



Diversified Scientific Services, Inc.

657 Gallaher Road • Kingston, TN 37763 • (423) 376-0084 • FAX (423) 376-0087

AD-0318-96

April 25, 1996

Dan Oakley
Los Alamos National Laboratory
PO Box 1663
MS J593
Los Alamos, NM 87545

SUBJECT: ACKNOWLEDGMENT OF RECEIPT OF RADIOACTIVE WASTE

Dear Mr. Oakley:

This is to notify you that the radioactive wastes generated by your facility, have been received by Diversified Scientific Services, Inc. Please find enclosed your copy of the acknowledgment. A copy of the Hazardous Waste Manifest will be forwarded to your attention once our laboratory has completed the confirmatory analyses. Should any discrepancies occur on the confirmatory analyses or the Hazardous Waste Manifest, I will notify you immediately.

DSSI appreciates your business, and looks forward to additional business in the future. In the meantime, if you have any questions, please feel free to call me at 423-376-8714.

Sincerely yours,

A handwritten signature in cursive script that reads "Larry L. Hembree".

Larry Hembree
Customer Service Manager

File DSSI-96-029