



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

3/31/97

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Chief
 Hazardous and Radioactive Materials Bureau
 New Mexico Environment Department
 2044 Galisteo St., Bldg. A
 P. O. Box 26110
 Santa Fe, New Mexico 87502

Dear Mr. Garcia:

Subject: Revision No. 5.0 to Site Treatment Plan (STP), Compliance Plan Volume (CPV)
 Covered Waste Inventory, Los Alamos National Laboratory (LANL) Federal Facility
 Compliance Order (FFCO), October 4, 1995.

The purpose of this letter is to request a revision to the covered waste inventories in LANL STP. This revision request has been prepared for the New Mexico Environment Department (NMED) by the Department of Energy (DOE) and the University of California (UC), in accordance with the requirements of Section X.C.2, "Revisions," of the FFCO. DOE and UC seek to revise the CPV language to incorporate the changes in covered waste inventories (discussed in the LANL FY 1996 STP *Annual Update*, transmitted concurrently with this letter) into the CPV inventories, specifically the following:

- Changes in Mixed Low-Level Waste (MLLW) covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1995, as reported in the FY 1995 *Annual Update*;
- Changes in MLLW covered waste inventories during FY 1996, discussed in the FY 1996 STP *Annual Update*; and,
- Changes in Mixed Transuranic (MTRU) covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1996, as reported in the FY 1995 and FY 1996 *Annual Updates*. This is due to volume changes and to the redefinition of MTRU treatability groups.

Information required by FFCO Section X.C.2, "Revisions," supporting our revision request is given in Enclosure B to this letter. Proposed revision text for NMED's approval will be submitted separately, as soon as NMED can provide DOE and UC with an electronic copy of the most current iteration of the LANL CPV. The following portions of this letter provide (1) background; (2) a brief description of our revision request; and (3) a summary.



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1.0 Background

As discussed in Section 2.1 of the *FY96 Background Volume Update* and Section 6.4 of the *FY 1996 Compliance Plan Volume Update* (which together comprise the LANL FY 1996 STP *Annual Update*), DOE and UC are seeking here to revise the CPV language. The purpose is to incorporate the changes in covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1996.

In early 1995, DOE and UC prepared a draft STP that listed the various treatability groups, the number of items known at that time to be in each, and the waste volume associated with these items. On October 4, 1995, NMED issued the FFCO and STP, including the draft STP covered waste volumes in the final CPV inventory. In the meantime, DOE and UC had been actively reducing the volume of waste in several treatability groups, by off-site shipment of waste for treatment and on-site decontamination of lead. After the FFCO was issued, DOE and UC discovered that a series of items had been inadvertently omitted from the draft STP inventory because of an error in the database query used to construct the original draft STP inventory.

The FY 1995 *Annual Update* reported volume changes known through September 30, 1995, which was prior to the issuance of the FFCO by NMED. All of the corrections to the inventory in the STP reported in the FY 1995 *Annual Update* pre-dated the issuance of the FFCO but were not included in the FFCO. Incorporation of these volume changes in the CPV inventory is now being requested.

2.0 Request for Revision

Enclosure B provides the information required by Section X.C.2, "Revisions," of the FFCO. DOE and UC are proposing to revise the CPV language to incorporate the changes in covered waste inventories (discussed in the LANL FY 1996 STP *Annual Update*, transmitted concurrently with this letter) into the CPV inventories. These include (1) all changes in MLLW covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1995, as reported in the FY 1995 *Annual Update*; (2) the changes in MLLW covered waste inventories during FY 1996, discussed in the FY 1996 STP *Annual Update*; and (3) the changes in MTRU covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1996, as reported in FY 1995 and FY 1996 *Annual Updates*.

The changes in total MTRU volumes reported in the FY 1996 STP *Annual Update* compared to previous years are primarily due to the redefinition of MTRU treatability groups, and therefore most of the volume change is an apparent change only. MTRU covered waste volume increases since the issuance of the FY 1995 STP *Annual Update* are responsible for only a small fraction of the total volume change reported in the FY 1996 STP *Annual Update*.

In the transmittal letter for the FY 1995 *Annual Update*, DOE and UC committed to submitting a revision for the CPV inventory corrections reported in the FY 1995 *Annual Update*; however, NMED has since requested a number of clarifications related to the FY 1995 *Annual Update* volume information, which are still ongoing as of this writing. Therefore, the corresponding revision had not heretofore been submitted for NMED's approval. However, in response to concerns raised in NMED's Letter of Violation (LOV) dated February 14, 1997, this revision, seeking incorporation of these volume changes in the CPV inventory, is now being requested.

Wastes were tentatively assigned to appropriate treatability groups in the FY 1995 and FY 1996 *Annual Updates*. In some instances, the wastes being added to some treatability groups bear

additional Environmental Protection Agency hazardous waste codes in addition to those given in the current CPV inventory; these will be noted where applicable in the proposed revision text, when submitted. Additional compliance dates will be requested in those cases where the additional covered wastes cannot be treated within the existing compliance dates specified for each treatability group.

In addition, DOE and UC have requested that many issues regarding additions and deletions of covered wastes be addressed through an amendment to the FFCO. This request was made in October 1996, and is currently being reviewed by NMED. DOE and UC believe many of the issues raised in NMED's Letter of Violation dated February 14, 1997 will be addressed in the near term by approval of this revision request, and in the long term by approval of the FFCO amendment request.

The inadvertent omission of several waste items from earlier drafts of the STP inventory are indicative of a quality assurance problem with past queries of the database and with past uses and interpretations of the data in LANL's database. The STP Corrective Action Plan is intended to address the root causes of this occurrence.

3.0 Summary

In summary, in the enclosed revision request, DOE and UC seek to revise the CPV language to incorporate the following changes:

- Changes in MLLW covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1995, as reported in the FY 1995 *Annual Update*;
- Changes in MLLW covered waste inventories during FY 1996, discussed in the FY 1996 *STP Annual Update*; and
- Changes in MTRU covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY 1996, as reported in the FY 1995 and FY 1996 *Annual Updates*, due to volume changes and to the redefinition of MTRU treatability groups.

Although all covered waste volume additions, and assignment to new treatability groups, currently require revision of the STP, we hope that when the FFCO is amended in accordance with our pending requests, the process of shifting existing wastes or adding new covered wastes to more appropriate treatability groups can be accomplished in a more efficient manner. The pending amendment request would propose that revisions would be required for significant volume changes, and other such changes would be documented in future Annual Updates and a corresponding annual revision.

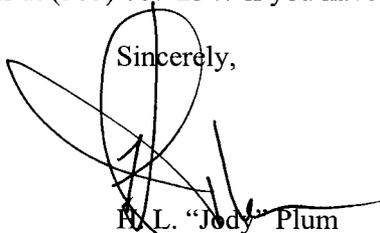
DOE and UC would like the opportunity to complete treatment of some of the additional covered MLLW discussed herein during FY 1997. Therefore, DOE and UC are requesting that NMED advise DOE and UC immediately, should NMED believe the revision must be approved prior to initiation of any such shipment. Such delay would cause some wastes to remain in storage subject to the FFCO for a much longer period than is currently planned, and in addition, will lead to additional mixed wastes entering the covered waste inventory (i.e., becoming out of compliance with LDR storage limitations) due to shipment delays.

In the event that NMED believes this revision must be approved prior to initiation of any shipments, DOE and UC would like the opportunity to submit an amendment to allow the specific covered wastes targeted for FY 1997 treatment to proceed with treatment in an expeditious manner, while this revision request completes the review and approval process.

A Certification statement is provided as Enclosure A. Proposed revision text for NMED's approval will be submitted separately, as soon as NMED can provide DOE and UC with an electronic copy of the most current iteration of the LANL CPV. LANL's records and documents related to these requests are available to NMED's staff upon request.

We would be happy to discuss the information contained in this letter with you at your earliest possible opportunity, and we request that you inform us in writing immediately, should you have any concerns regarding our timely and full compliance with FFCO requirements. Please contact me at (505) 665-5042, or Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "R.L. 'Jody' Plum". The signature is written over the word "Sincerely," and extends to the right.

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

LAAMEP:2JP-070

Enclosures

cc w/enclosures:

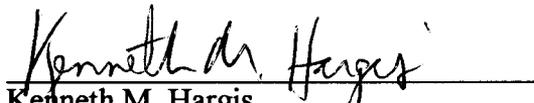
J. Archuleta

Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87502

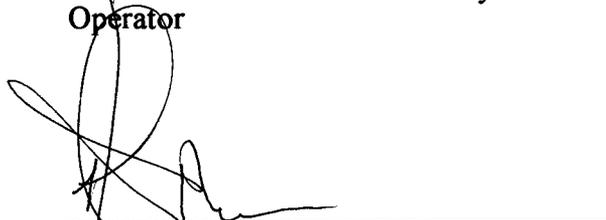
**ENCLOSURE A
CERTIFICATION**

**REVISION NO. 5.0 TO SITE TREATMENT PLAN, COMPLIANCE PLAN
VOLUME (CPV) COVERED WASTE INVENTORY, LOS ALAMOS NATIONAL
LABORATORY (LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO),
OCTOBER 4, 1995.**

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
Project Manager, EM/WM Programs
Los Alamos National Laboratory
Operator

3/31/97
Date Signed


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

3/31/97
Date Signed

ENCLOSURE B LANL STP PROPOSED REVISION

The following portions of this enclosure follow the requirements of Section X.C.2, "Revisions," of the FFCO. Proposed STP text follows the Section X.C.2.d narrative below. These inventory changes are summarized in Enclosure C.

Section X.C.2.a. Detailed description of the proposed revision. For the reasons given in the following paragraphs, DOE and UC are proposing to revise the Compliance Plan Volume (CPV) language to incorporate the following changes:

- Changes in mixed low-level waste (MLLW) covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY95, as reported in the *FY95 STP Annual Update*;
- Changes in MLLW covered waste inventories during FY96, discussed in the *FY96 STP Annual Update*; and
- Changes in mixed transuranic (MTRU) covered waste inventories that have been reported since the FFCO was issued in October 4, 1995, up through the end of FY96, as reported in the *FY95 and FY96 Annual Updates*, due to volume changes and to the redefinition of MTRU treatability groups.

These changes are summarized in Enclosure C. The specific CPV text changes will be submitted separately, upon receipt of an electronic copy of the current LANL CPV.

Background

The inventory presented in the Final STP (October 4, 1995) was for MLLW in storage before October 1, 1994 and MTRU in storage before December 1992, regardless of its time of generation or its state of compliance with the Land Disposal Restrictions (LDRs) storage requirements. In addition, some wastes reported in the *FY95 Update* were in the LANL mixed waste inventory at that time, but inadvertently had been omitted from the final STP inventory. All such untreated waste now meets the definition of "covered waste" in the FFCO. This Update repeats the information presented in the *FY95 Update* on changes from the Final STP inventory during FY95, and describes changes to the covered waste inventory that occurred in FY96. Mixed waste that was generated in FY96 is not included in the *FY96 Update*, because it is not a covered waste under the FFCO until it no longer complies with the LDR 1-year storage limitation.

Because other documents published by the DOE require different reporting parameters and periods, the volumes of covered waste reported in the *FY96 Update* may not be the same as the volumes of LANL's mixed waste reported in other documents, such as the "1995 Hazardous Waste Report for Los Alamos National Laboratory, Volumes I and II," (LANL's Biennial Report) and the *DOE Transuranic Waste Baseline Inventory Report* (TWBIR or BIRD).

Table R5-1 summarizes the changes in the MLLW covered waste inventory occurring in FY96. Table R5-2 shows the volume of MTRU covered waste currently in storage as of the end of FY96 and CY96.

The STP Inventory Update Summary Tables (Tables R5-1 and R5-2) in Enclosure C, excerpted from the LANL FY96 STP *Annual Update*, present a summary of LANL STP covered waste streams by treatability groups for mixed low-level mixed waste (MLLW) and MTRU, respectively. The volumes given in Table R5-1 reflect changes to the individual MLLW treatability group volumes due to increases or decreases, as noted. As stated previously, mixed waste that was generated in FY96 is not reported, because it was not a covered waste subject to the FFCO as of September 30, 1996.

In general, **increases** may be attributed to:

- addition of waste that became covered waste since preparing the Mixed Waste Inventory Report ([MWIR], which served as the basis for the covered waste inventories reported in the original STP);
- reassignment of covered waste from one existing treatability group to another existing treatability group (not done during FY96), based on LANL's ongoing reevaluation of new or existing data;
- reassignment of covered MTRU waste to new treatability groups, based on LANL's ongoing reevaluation of new or existing data;
- correction of inaccurate volume information;
- addition of waste in inventory before October 1, 1995, that was inadvertently omitted from the STP inventory; or
- addition of waste that became covered waste during FY96.

Decreases may be attributed to:

- shipment of waste to an off-site facility for treatment;
- treatment of waste in a treatability study;
- other compliant management activity, such as recycling;
- reassignment of covered waste to another existing treatability group, based on reevaluating the new or existing data;
- reassignment of covered MTRU waste to new treatability groups, based on LANL's ongoing reevaluation of new or existing data;
- correction of inaccurate volume information;

- removal of waste from the inventory prior to the issuance of the FFCO, based on the reasons noted in the tables; or
- reclassification of waste as either hazardous waste or LLW based on new or existing data.

Section X.C.2.b. Rationale for the proposed revision. DOE and UC have the following reasons for requesting this revision. In the transmittal letter for the FY95 *Annual Update*, DOE and UC committed to submitting a revision for the CPV inventory corrections reported in the FY95 *Annual Update*; however, NMED has since requested a number of clarifications related to the FY95 *Annual Update* volume information, which are still ongoing as of this writing. Therefore, the corresponding revision had not heretofore been submitted for NMED's approval. However, in response to concerns raised in NMED's Letter of Violation (LOV) dated February 14, 1997, this revision, seeking incorporation of these volume changes in the CPV inventory, is now being requested.

Wastes were tentatively assigned to appropriate treatability groups in the FY95 and FY96 *Annual Updates*. In some instances, the wastes being added to some treatability groups bear additional EPA hazardous waste codes in addition to those given in the current CPV inventory; these will be noted where applicable in the proposed revision text, when submitted. Additional compliance dates will be requested **in those cases where the additional covered wastes cannot be treated within the existing compliance dates specified for each treatability group.**

MLLW Inventory Summary

The increases in covered waste inventory as of the end of FY96 are attributable primarily to waste that was newly generated in FY95, which was not treated within 12 months of generation, thereby becoming covered waste during FY96. The decreases reflect the treatment and disposal of covered waste inventory at off-site commercial and off-site DOE facilities during FY96, and the treatment of covered wastes in on-site and off-site treatability studies during FY96. In addition, a small volume of waste treated in an on-site treatability study during FY95 is also reflected as a FY96 decrease, because it was inadvertently omitted from the March 1996 FY95 *Annual Update*.

Information on FY95 changes to LANL's covered MLLW Inventory, presented in the FY95 *Annual Update*, are repeated here for informational purposes only, so the reader can track all changes in the LANL covered waste inventory that have occurred between October 4, 1995 and the end of FY96.

MTRU Inventory Summary

The MTRU covered waste inventory at LANL as of the end of FY96 is summarized in Table R5-2. The table shows the volumes of MTRU covered waste for each treatability group. After the enactment of the Federal Facility Compliance Act (FFCA) in 1992, efforts were made to identify all mixed waste in storage at LANL. Because much of the TRU inventory was generated before the Resource Conservation and Recovery Act

(RCRA) regulations were applicable to mixed waste, identification of MTRU as a subset of TRU necessarily relied largely on existing records. As stated in Section 1.5.1 of the original STP BV, until recently, the best available data for MTRU was published in the April 1993 Interim MWIR, and it was used to provide the MTRU waste inventory data in Section 4.1 of the original STP BV.

Changes in MTRU Volumes

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 application of more conservative assumptions regarding the processes generating the waste. Thus, more of the existing TRU inventory now is identified as potentially being MTRU. Formerly, DOE and UC had assumed that approximately 70% of the legacy stored TRU was MTRU. As a result of this recent reinvestigation, DOE and UC now believe as much as 95% of LANL's stored TRU may be MTRU. Therefore, differences in total MTRU inventory volumes between Table R5-2 and the MTRU waste inventory data in Section 4.1 of the original STP BV are due largely to better knowledge of the legacy MTRU inventory since the Interim MWIR report was published.

The DOE relies primarily on two complex-wide data reports to provide information concerning MTRU generation and disposition: the MWIR and the *Transuranic Waste Baseline Inventory Report* (TWBIR; now termed BIRD).

- The MWIR is published by the DOE in response to the FFCAct requirement to submit to the EPA and to the State of New Mexico a report containing a national inventory of mixed waste and treatment capacities and technologies for mixed waste. Specific information regarding each waste stream was given for mixed waste generated from facility operations and the LANL Environmental Restoration Project.
- The BIRD summarizes the DOE TRU waste inventory, projections, and characteristics. The purpose of the BIRD is to document the total inventory of DOE TRU (not only the MTRU) as defined by the waste generator/storage sites, including waste that is not currently designated by DOE for disposal at WIPP.

As these data reports have matured, new information needs and new uses for the data have been identified, resulting in additions to or changes in parameters used to define MTRU waste streams across the DOE complex. As better process knowledge becomes available, it has been incorporated into the LANL TRU waste database. As part of these recent reevaluations for revisions to the BIRD reports (see below), waste streams created prior to 1991 (when LANL generators officially began using the waste profile form (WPF) to characterize their newly generated TRU waste), were revisited and more conservative approaches were used to define the percentage that is managed as mixed waste (e.g., all combustibles were assumed to contain rags with solvents, which were conservatively classified as F001 and F002 wastes). As a result, the percentage of LANL's total TRU inventory managed as mixed waste appeared to increase although the same volume of TRU waste is in inventory at LANL.

Thus, the LANL TRU waste database has evolved to address changes in DOE complex-wide requirements; the most notable change presented here is the re-casting of MTRU treatability groups. Because characterization of the TRU inventory through sampling and analysis is ongoing, DOE and UC anticipate some further changes to waste volumes may be reported in the future as newer and more accurate data become available.

Changes in MTRU Waste Categories

In an effort to support the WIPP Performance Assessment (PA), the BIRD report has been revised several times. The MTRU treatability groups reported in the *FY95 STP Annual Update* differed from those in the original STP BV, because in FY95 the waste categories defined in the BIRD II report were used. As a result of the new PA requirements, the LANL TRU waste categories were revised again during FY96 (for the BIRD III report) to better reflect refinements in DOE's TRU waste information. Therefore, the new BIRD III waste categories were used in the *FY96 STP Update* to identify the same volume of TRU waste reported previously.

DOE Headquarters has recently decided to merge the MWIR and the BIRD databases. The information provided in Table R5-2, the FY96 TRU Inventory Update Summary, reflects the changes made to the waste treatability groups as a result of the combined MWIR/TWBIR data. Table R5-2 continues to reflect the volumes of MTRU waste generated at LANL for FY92-FY94, but this information is being presented in the new, combined MWIR/TWBIR-BIRD treatability groups.

Therefore, differences in total MTRU inventory between Table R5-2 and the MTRU waste inventory data originally given in Section 4.1 of the STP BV are due to two key changes: (1) the re-analyses and re-casting of the original MTRU volume data in the new, combined treatability groups (and reclassification of a greater percentage of the total volume as MTRU); and (2) the generation of a small volume of additional MTRU that has become covered waste since the April 1993 Interim MWIR report was published.

Calendar-Year versus Fiscal-Year MTRU Reporting

It is important to recognize that some inconsistencies in MTRU waste volumes reported here and in future *STP Updates* will continue to exist because of the variations in update cycles (reporting periods) for the *Update* versus other documents reporting mixed waste inventories published by the DOE (i.e., the MWIR and BIRD). Because the *STP Update* requires reporting of covered waste only, the volumes listed herein are of covered MTRU in storage as of the previous fiscal year. However, covered MTRU volumes are also reported here on a calendar-year (CY) basis. In most of the reports that LANL regularly provides to DOE and the public, the waste volumes are reported on a CY basis. For example, the Integrated Data Base (IDB), the BIRD for WIPP, and the *Mixed Waste Inventory Report* all report waste volumes as of 12/31/96 as their latest information. Making the STP reporting consistent with these reports will help to resolve some of the issues related to apparent inconsistency of numbers. DOE and UC are requesting that this revision incorporate the new MTRU treatability group designations, and the use of the CY reporting period rather than the FY reporting period for MTRU, in the STP.

It should be noted that the definition of "covered waste" in the FFCO does not depend on listing of a waste item in the CPV inventory, and that there is no specified time period in the FFCO for submitting this revision to NMED, except that a revision must be submitted within two *Annual Update* cycles. Therefore, DOE and UC disagree with the basis for the concerns raised in NMED's Letter of Violation. Nonetheless, DOE and UC are submitting this revision request, concurrently with submission of the FY96 *Annual Update*, to formally incorporate all covered waste volumes discussed in the FY95 and FY96 *Annual Updates* (i.e., all covered waste volumes identified from the date of issuance of the FFCO through the end of FY96) into the CPV inventory.

Section X.C.2.c. Anticipated length of any delay in performance. DOE and UC would like the opportunity to complete treatment of some of the additional covered MLLW discussed herein during FY97. Therefore, DOE and UC are requesting that NMED advise DOE and UC immediately, should NMED believe the revision must be approved prior to initiation of any such shipment. Such delay would cause some wastes to remain in storage subject to the FFCO for a much longer period than is currently planned, and in addition, will lead to additional mixed wastes entering the covered waste inventory (i.e, becoming out of compliance with LDR storage limitations) due to shipment delays.

Section X.C.2.d. Plan and schedule for implementing all reasonable measures... In the event that NMED believes this revision must be approved prior to initiation of any shipments, DOE and UC would like the opportunity to submit an amendment to allow the specific covered wastes targeted for FY97 treatment to proceed with treatment in an expeditious manner, while this revision request completes the review and approval process.

DOE and UC have also requested that many issues regarding additions and deletions of covered wastes be addressed through an amendment to the FFCO. This request was made in October, 1996, and is currently being reviewed by NMED. DOE and UC believe many of the issues raised in NMED's Letter of Violation dated February 14, 1997 will be addressed in the near term by approval of this revision request, and in the long term by approval of the FFCO amendment request.

ENCLOSURE C

Covered Waste Volume Totals and Changes

Summary of Volume Totals and Changes for MLLW

	FY95	FY96
Total STP reported volume	608.6 m ³	---
Total covered waste in storage at end of FY	608.9 m ³	584.1 m ³
Volume Changes (+/-)		
Volume treated in treatability studies	-0.22 m ³	-1.20 m ³
Decontaminated and released	-37.92 m ³	---
Received from FY95 LD200 effort	+38.34 m ³	---
Waste volume omitted from original STP inventory	---	+4.20 m ³
Newly generated waste that became covered waste at end of FY	---	+51.34 m ³
Volume shipped off-site	-2.24 m ³	-79.22 m ³
Volume increase for waste that was inadvertently omitted from the STP inventory	+2.36 m ³	---

**Note: In the FY95 Annual Update, LANL inadvertently failed to report on a treatability study conducted in FY95 on electrochemical treatment (See Section 2.2.1 of FY96 BV Update).*

Table R5-1 summarizes the changes in the MLLW covered waste inventory occurring in FY96. Table R5-2 shows the volume of MTRU covered waste currently in storage as of the end of FY96 and CY96.

Table R5-1. FY96 MLLW Inventory Update Summary

SIC	Waste Description	FY95 Inventory (m)	FY95 Change Category	Description of Change	FY95 Inventory (m)	FY96		Inventory (m)	Projected Inventory (m)
						Change	Inventory (m)		
3.1.1	LA-W901 IPA Wastes	15.89	NC ^c		15.89	Increase d 4.07 ^d Decrease d 19.98	Waste volume incorrectly reported in original STP inventory Shipped off-site for treatment at commercial or DOE facilities during FY96	0.02	0.0
3.1.1	LA-W902 Scintillation Fluids	2.47	Decrease d 2.24	Commercially treated in FY95	0.23	Increase d 0.13 ^d Decrease d 0.36 ^d	Waste volume incorrectly reported in original STP inventory Shipped off-site for treatment at commercial or DOE facilities during FY96	0.0038 ^g	0.0
3.1.2	LA-W903 Lead Blankets	0.74	NC		0.74	Decrease d 0.74	Shipped off-site for treatment at commercial facility during FY96	0.00	0.0
3.1.2	LA-W904 Soil with Heavy Metals	10.53	NC		10.53	Increase d 0.11	Waste that was newly generated in FY95 that became covered waste in FY96	10.64	0.5
3.1.2	LA-W905 ER Soils	39.32	NC		39.32	Decrease d	Shipped off-site for treatment or disposal at commercial facility	0.00	0.0

City Site	Waste Stream and Description	CPV Vol. (m ³)	FY95		Covered Vol. End of FY95 (m ³)	FY96		FY96 Vol. End of FY96 (m ³)	Projectio n FY97- FY01 (m ³)
			Change Covered Waste (m ³)	Explanation for FY95 change		Change Covered Waste (m ³)	Comments		
						39.32	during FY96		
3.1.3	LA-W906 Aqueous Organic Liquids	1.65	Increase d 0.43	Inadvertently omitted from STP	2.08	Increase d 3.62	Waste that was newly generated in FY95 that became covered waste in FY96	5.70	18.1
3.1.4	LA-W911 Organic- Contaminated Combustible Solids	28.32	Decrease d 0.11 Increase d 0.17	Treated in treat- ability study in FY95 Inadvertently omitted from STP	28.38	Increase d 5.24 Decreas ed 0.11	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY96	33.51	26.2
3.1.4	LA-W919 Organic- Contaminated Noncombustible Solids	7.82	Decrease d 0.11 Increase d 0.001	Treated in treat- ability study in FY95 Inadvertently omitted from STP	7.71	Increase d 9.58	Waste that was newly generated in FY95 that became covered waste in FY96	17.29	47.9
3.1.5	LA-W912 Combustible Debris	13.82	NC		13.82	Increase d 0.28	Waste that was newly generated in FY95 that became covered waste in FY96	14.10	1.4
3.1.5	LA-W921	15.60	Decrease	Decontaminated	18.29	Increase	Waste that was newly generated	8.13	11.5

Waste Stream	Waste Description	CPV WQI (m)	FY95		FY96		Waste Description	FY95 WQI (m)	FY96 WQI (m)	Projected in FY97 FY01 (m)
			Change in FY95 WQI (m)	Change in FY95 WQI (m)	Change in FY96 WQI (m)	Change in FY96 WQI (m)				
	Activated or Inseparable Lead		d 7.42	and released in FY95		d 2.29	in FY95 that became covered waste in FY96			
			Increase d 10.11	Received from LD200 effort		Decreas ed 12.45	Shipped for off-site treatment at commercial facility during FY96			
3.1.5	LA-W922 Noncombustible Debris	5.62	Decrease d 0.0002	Treated in treat- ability study in FY95	6.87	Increase d 21.04	Waste that was newly generated in FY95 that became covered waste in FY96	27.91	105.2	
			Increase d 1.25	Inadvertently omitted from STP						
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	1.85	NC		1.85	Increase d 0.15	Waste that was newly generated in FY95 that became covered waste in FY96	1.65	0.8	
						Decreas ed 0.030	Shipped for treatment in on-site treatability study during FY95			
						Decreas ed	Shipped for treatment in on-site treatability study during FY96			

Waste Code	Waste Description	FY95 Total Waste (m)	FY95 Covered Waste (m)	Disposition for FY95 Treatment	FY95 Total Waste (m)	FY96 Covered Waste (m)	Disposition for FY96 Treatment	FY96 Total Waste (m)	Projectio n FY97 FY01 (m)
						0.32			
3.1.6	LA-W914 Corrosive Solutions	1.36	Increase d 0.04	Inadvertently omitted from STP	1.40	Increase d 0.08 Decreas ed 0.67	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY96	0.81	0.4
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.13	Decrease d 0.0003 Increase d 0.02	Treated in treat- ability study in FY95 Inadvertently omitted from STP	0.15	Increase d 0.02 Decreas ed 0.0002 Decreas ed 0.0031	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY95 Shipped for treatment in on-site treatability study during FY96	0.17	0.1
3.1.7	LA-W916 Water-Reactive Wastes	6.03	Increase d 0.02	Inadvertently omitted from STP	6.05	Increase d 0.01	Waste that was newly generated in FY95 that became covered waste in FY96	6.06	0.05

Waste Stream	Waste Description	FY95 Vol (m ³)	FY95			FY96			Projection FY97-FY01 (m ³)
			Change	Explanation of Change	Vol (m ³)	Change	Comments	Vol (m ³)	
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35	NC		0.35	NC		0.35	0.0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.08	NC		0.08	Increase d 0.01	Waste that was newly generated in FY95 that became covered waste in FY96	0.09	0.0
3.1.1 0	LA-W920 Elemental Mercury	0.50	NC		0.50	Increase d 0.02	Waste that was newly generated in FY95 that became covered waste in FY96	0.52	0.1
3.2.1	LA-W907 Halogenated Organic Liquids	16.58	Increase d 0.04	Inadvertently omitted from STP	16.62	Increase d 0.45 Decrease d 0.0025	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY96	17.07	2.3
3.2.1	LA-W908 Nonhalogenated Organic Liquids	14.34	Increase d 0.08	Inadvertently omitted from STP	14.42	Increase d 2.83	Waste that was newly generated in FY95 that became covered waste in FY96	17.25	14.2
3.2.1	LA-W909 Bulk Oils	3.75	NC		3.75	Increase d 2.28	Waste that was newly generated in FY95 that became covered waste in FY96	6.03	11.4

FY95 Site	Waste Material	FY95 Vol (m ³)	FY95 Changes Covered	Disposition to FY95 (Closing)	FY95 Covered Vol (m ³)	FY95 Changes Covered	Comments	FY96 Vol (m ³)	Projection FY97-FY01 (m ³)
3.2.1	LA-W910 PCB Wastes with RCRA Components	0.74	NC		0.74	NC		0.74	0.0
3.2.1	LA-W923 Inorganic Solid Oxidizers	0.20	Increase d 0.32	Inadvertently omitted from STP	0.52	Decreas ed 0.087	Shipped for treatment in off-site treatability study during FY96	0.43	0.2
3.3	LA-W924 Lead Wastes - TBD	51.44	Decrease d 11.28	Decontaminated and released in FY95	40.16	NC		40.16	0.0
3.3	LA-W925 Mercury Wastes - TBD	18.30	NC		18.30	Increase d 1.52	Waste that was newly generated in FY95 that became covered waste in FY96	19.82	7.6
3.3	LA-W926 Compressed Gases - TBD	1.25	NC		1.25	NC		1.25	0.0
3.3	LA-W927 Biochemical Laboratory Wastes	1.34	NC		1.34	NC		1.34	0.0
3.3	LA-W928 Dewatered Treatment Sludge	268.1 7	NC		268.17	NC		268.17	0.0
3.4.1	LA-W930	56.20	Decrease	Decontaminated	64.06	Increase	Waste that was newly generated	65.31	6.3

Waste Category	Waste Description	FY95 Volume (m ³)	FY95		FY96 Volume (m ³)	FY96		Change FY95 to FY96 (m ³)	Projection FY97 to FY01 (m ³)
			Change	Description		Change	Description		
	Lead for Surface Decontamination		Increased 14.64	and released in FY95 Received from LD200 effort		Decreased 1.25	in FY95 that became covered waste in FY96		
3.4.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	14.24	Decreased 0.002 Increased 0.00002	Decontaminated and released in FY95 Inadvertently omitted from STP	14.24	Decreased 0.00094 Decreased 0.0029	Shipped for treatment in on-site treatability study during FY95 Shipped for treatment in on-site treatability study during FY96	14.24	0.0
None ^d	LA-W931 Lead Requiring Sorting	9.97	Decreased 4.58 Increased 5.73	Decontaminated and released in FY95 Received from LD200 effort	11.12	Increased 0.44 Decreased 6.36	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for off-site treatment at commercial facility during FY96	5.20	2.2
None ^e	LA-W932 Explosives	0.0	NC			NC		0.0	0.0

Waste Stream	Waste Description	CPN Vol (m)	FY95 Change (m)	Explanation of FY95 Change	FY95 Vol (m)	FY96 Change (m)	Explanation of FY96 Change	FY96 Vol (m)	Projected FY01 Vol (m)
None	LA-W933 Lab Packs	0.0	NC			Increased 0.13	Waste that was newly generated in FY95 that became covered waste in FY96	0.13	0.8

NOTES TO TABLE R5-1.

- ^aThese changes in FY95 covered waste volume are based on waste work-off and corrections to data errors that occurred prior to the issuance of the FFCO/STP.
- ^bThese changes in FY96 covered waste volume are based on inclusion of FY95 newly generated waste and waste work-off during FY96.
- ^cNC means No Change in the covered waste inventory.
- ^dThe volume changes for LA-W901 and LA-W902 in FY96 are based on current data in LANL's waste database. They are consistent with the original documentation submitted by the waste generator, and they are representative of the actual volumes of these waste shipped for treatment. The volumes used during the preparation of the original STP were erroneous, thereby resulting in more waste being shipped than reported in the original STP inventory. This volume inconsistency was discussed in NMED's letter dated March 5, 1997.
- ^eThis treatability group (LA-W931, *Lead Requiring Sorting*) is not listed in the *Compliance Plan Volume*; however, it is discussed in section 3.4.3 of the *Background Volume*.
- ^fThe treatability groups LA-W932, *Explosives*, and LA-W933, *Lab Packs*, were not part of the original STP. They have been proposed for addition in LANL's February 28, 1997 revision request. This revision is currently under review by NMED.
- ^gThe final FY96 volume for most treatability groups is reported to two decimal places for consistency with the original STP inventory. The final FY96 LA-W902 volume is given as 0.0038m³ (i.e., reported to four decimal places) in order to accurately report the presence of one small-volume waste item in this treatability group remaining in the LANL inventory at the end of FY96. This item was in fact shipped off-site on December 20, 1996.

Table R5-2. MTRU Covered Waste Volumes

Waste Treatability Group	EPA Code	Estimated Volume (m ³)	Estimated Volume (m ³)	Projections Volume (m ³)
Solidified Inorganic and Organic Solids	D006,D007,D008,D019 ,D021,D039, F001,F002,F003	1,598.29	1,598.29	20.86
Metallic Waste	D004,D006,D007, D008,D009,D019, D040	1,684.47	1,684.47	118.6
Glass Waste	D008,D009,D019, D040	89.65	89.86	0.0
Non-Combustible Waste	D008	947.09	947.09	0.0
Combined Combustible and Non-Combustible Waste	D008,F001,F002	449.20	449.20	166.65
Combustible Waste	D007,D008,D019, D040,F001,F002, U080	1,052.41	1,052.41	76.9
Absorbed Organic		2.70	2.70	0.0
Cemented Process Sludge	D007,D008,D009, D019,F001,F002, F005	156.57	156.57	83.0
Leaded Glovebox Gloves	D008	1.46	1.46	2.1
Total		5,981.84	5,982.05	447.25