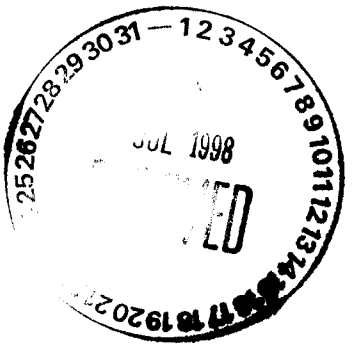
Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

JUN 3 0 1998



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), Compliance Plan Volume (CPV), Revision Request No. 7.0, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO), October 4, 1995.

The purpose of this letter is to transmit the above captioned documents. This revision to the CPV, LANL STP, 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 proposed changes.

Information required by FFCO Section X.C.2, "*Revisions*," supporting our revision request is provided with this letter. Proposed revision text, using the redline/strikeout method, is attached as Enclosure A. A clean copy version of the proposed CPV text for NMED's approval is attached as Enclosure B. The Certification Statement is attached as Enclosure C. Also enclosed is a disk copy for your convenience.

We would like to meet with you at your earliest convenience to discuss the information contained in this proposal. Please contact me at (505) 665-5042 or Ken Hargis at (505) 667-2347 if you have any questions.

Sincerely,

H. L. "Jody" Plum
Office of Environment

LAAME:6JP-075

Enclosures

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

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LOS ALAMOS NATIONAL LABORATORY
SITE TREATMENT PLAN
PROPOSED REVISION 7.0

LOS ALAMOS NATIONAL LABORATORY
FEDERAL FACILITY COMPLIANCE ORDER

The purpose of this revision request is to reflect changes in the Compliance Plan Volume (CPV) of the Site Treatment Plan (STP), as detailed below. The proposed CPV text changes are indicated in the redline strikeout version provided in Enclosure A. The revised CPV text is provided as Enclosure B.

Section X.C.2.a. of Federal Facility Compliance Order (FFCO), Los Alamos National Laboratory (LANL): Detailed description of the proposed revision.

1. Removal of On-Site Treatment Skids.

The Department of Energy (DOE) and the University of California (UC) are proposing to modify the CPV to remove activities and compliance dates related to the construction, permitting, and operation of on-site treatment skids. DOE and UC would like to clarify language in the CPV, in Sections 2 and 3, to emphasize that off-site treatment is the primary treatment option applicable to all mixed low level waste (MLLW) streams in LANL's CPV. DOE and UC would like to continue evaluating new commercial and DOE off-site treatment facilities as potential options for managing covered MLLW, as they become available. The following sections of the CPV are proposed for removal of activities related to on-site treatment skids: 3.1.3 Evaporative Oxidation, 3.1.4 Thermal Desorption, 3.1.5 Macroencapsulation, 3.1.6 Chemical Plating Waste Treatment Skid, 3.1.7 Water-reactive Metals Treatment Skid, 3.1.8 Gas-scrubbing Skid, 3.1.9 Gas Oxidation Skid, 3.1.10 Mercury Amalgamation, and 3.1.11 (currently Section 3.2.1) Hydrothermal Processing.

2. Addition of Gas Cylinders.

DOE and UC are proposing to add 27 gas cylinders to the STP inventory, 12 in the Treatability Group, *"Compressed Gases Requiring Scrubbing,"* MWIR waste ID LA-W917 and 15 in the Treatability Group, *"Compressed Gases Requiring Oxidation,"* MWIR waste-ID LA-W918. Eighteen of the 27 gas cylinders have been subject to the Compliance Order 94-09 Amended Stipulation, requiring additional characterization. Nine of the 27 cylinders were discovered during a recently performed quality check of the physical inventory. LANL has stored all of these cylinders at TA-54 pending sampling and preparation for treatment. DOE and UC propose to manage this waste in

accordance with Activities and Compliance Dates already existing in the Compliance Plan Volume for these treatability groups. The following table describes the proposed volumes to be added to each treatability group.

STP Section	MWIR waste ID	Description	No. of Items	Volume (m^3)
3.1.8	LA-W917	Compressed Gases Requiring Scrubbing	12	0.28
3.1.9	LA-W918	Compressed Gases Requiring Oxidation	15	0.46

3. Addition of On-Site Recycling/Re-use.

DOE and UC are proposing to add on-site recycling or re-use to each treatability group in the CPV, as a parallel preferred option. DOE and UC are currently reviewing on- and off-site recycling options for all waste streams present in the STP covered waste inventory. Pollution prevention initiatives such as the use of LANL's Chemical Exchange Program to recycle/re-use chemicals characterized as STP mixed waste, and recycling of metals such as lead, are two examples of recycling/re-use options that are being evaluated. Once a waste has been recycled or reused, DOE and UC would follow the requirements prescribed in proposed CPV Section 2.3, in the same manner as if the waste were shipped off-site for treatment. DOE would provide a notification letter to the NMED within 45 days, in place of documentation that the waste was received at an off-site facility. The waste would then be proposed for deletion in the annual revision request.

4. Notification for Off-Site Treatability Studies.

DOE and UC are proposing to modify the CPV under the proposed Section 2.5, " Plans Related to Other Mixed Waste Activities" to specify that DOE and UC will continue to notify the NMED when off-site treatability studies are conducted on STP waste. This notification is consistent with the commitment expressed in our August 29, 1996 letter to the NMED.

5. Provide Option of Shipping Covered Waste, Under Special Circumstances, Prior to Addition by Approved Revision.

DOE and UC are proposing a methodology, in proposed CPV Section 2.5, to expedite the shipment of covered waste to off-site facilities for treatment, pending formal addition of the waste in an approved revision. This methodology would apply in circumstances

where covered waste could be added to a planned off-site shipment, rather than storing the waste for separate shipment pending formal addition to the STP inventory.

DOE and UC are proposing to send a notification letter to the NMED when such an expedited treatment opportunity arises. The waste would be shipped only when the NMED confirms that the expedited treatment is acceptable. The covered waste would still be included for addition in the next scheduled Annual Update and associated revision request.

6. Addition of Capability for On-Site Radiological Decontamination. – Segregation

DOE and UC are proposing to add the capability, in the proposed CPV Section 2.7, for on-site radiological decontamination activities such as sand blasting, hand-scrubbing, or electrolytic decontamination. These decontamination activities could result in reducing or removing the radiological contaminant from the waste such that the waste could be recycled in accordance with proposed CPV Section 2.6, or released as non-radioactive in accordance with Section V.B of the amended FFCO.

7. Modifications to tables in CPV Sections 3.1.1, 3.1.2 and proposed Section 2.3.

In accordance with the request made in the NMED letter dated February 18, 1998, DOE and UC are proposing to modify the tables in CPV Sections 3.1.1 and 3.1.2 to delete Activity A, *"Meet all regulatory requirements prior to shipping waste"*. The same modification would apply to Tables III and IV in proposed Section 2.3. DOE and UC are proposing to delete Activity A, *"Meet all regulatory requirements for off-site shipment,"* from the tables in these sections.

Also in accordance with the request made in the NMED letter dated February 18, 1998, the following modification is proposed. The date for Activity B, *"Complete shipping waste,"* in CPV Section 3.1.1 is proposed to include a footnote to reflect that the activity date refers to the applicable waste in the original treatability group and will note that one item was transferred from Treatability Group LA-W901 to Treatability Group LA-W906 in Revision 5.0, approved 12/29/97 by the NMED.

8. Modifications to proposed CPV Section 3.1.11.

DOE and UC are proposing to add a table of activities and compliance dates in proposed CPV Section 3.1.11 (currently Section 3.2.1), "Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components, and Liquid and Solid Oxidizers." This table summarizes the information documented in the narrative associated with this section and is consistent with other sections of the CPV. The proposed table is included below.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel options	02/01/02
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

DOE and UC are also proposing, for consistency, to remove a milestone from this section concerning the submittal of treatment or off-site shipment schedules and options for NMED's approval by November 30, 1998. The compliance date for the completion of shipping of existing waste to an off-site treatment facility or the completion of parallel options is proposed to remain unchanged.

9. Addition of Section 3.3.3, "Lead Requiring Sorting," to the CPV.

DOE and UC are proposing to add the following information as Section 3.3.3, "Lead Requiring Sorting," in the CPV. The Treatability Group with MWIR waste ID LA-W931 is addressed in the Background Volume (BV), but was not previously included in the CPV. The proposed text is adapted from the BV, as follows:

3.3.3 Lead Requiring Sorting.

Treatability Group(s)

Treatability Group	MWIR Waste ID	RCRA Codes	Number of Items	Net Volume (m^3)
Lead requiring sorting	LA-W931	D008	12	1.08
Totals			**12**	**1.08**

Treatment:

Wastes in this treatability group are generally heterogeneous and will require different treatment processes. Drums will be opened, the contents removed, and the waste repackaged based on appropriate treatment requirements. Wastes in this treatability group are primarily lead pieces, lead shot, and lead-contaminated soils that have been packaged in the same drum.

The wastes will be reclassified to the applicable treatability group after physical separation and repackaging. The wastes will be treated by the appropriate technology.

Activities for waste items in this treatability group.

Activity	Compliance Dates
A. Complete sorting	06/01/01
B. Submit documentation assigning waste items to applicable treatability groups Propose additional compliance dates, if necessary or;	06/01/03
C. Complete shipment of existing waste to off-site facility for treatment or complete parallel options.	06/01/03

10. Adjustments to STP Covered Waste Inventory.

DOE and UC are proposing to add the following newly identified covered waste to the STP inventory. This waste represents items such as found waste items that were used during the Sorting, Surveying, and Decontamination (SSD) program. These wastes are being managed as mixed wastes but were not previously identified in the STP inventory. A quality check of the database has been conducted in order to identify these items. One waste item, proposed for addition in the treatability group LA-W908, *"Nonhalogenated organic liquids,"* with a volume of 0.00095 cubic meters, is proposed to be transferred from the *"Missing/nonexistent/TBV"* category, although the change will not be reflected in the summary tables because of the small volume involved. Another waste item is proposed for addition in order to adjust the original STP inventory data. This waste item is also proposed for transfer from treatability group LA-W930, *"Lead for Surface Decontamination"* to treatability group LA-W921, *"Activated and Inseparable Lead."* The following table describes the modifications proposed to the CPV sections listed below.

STP Section	MWIR waste ID	Description	No. of Items	Volume (m^3)
3.1.11 (3.2.1)	LA-W907	*Halogenated organic liquids*	12	0.04
3.1.11 (3.2.1)	LA-W908	*Nonhalogenated organic liquids*	56	0.02
3.1.4	LA-W911	*Organic-contaminated combustible solids*	1	0.001
3.1.5	LA-W912	*Combustible debris*	2	0.0005
3.1.4	LA-W919	*Organic-contaminated noncombustible solids*	4	0.002
3.1.5	LA-W921	*Activated or Inseparable Lead*	1	0.208
3.3.1 (3.4.1)	LA-W930	*Lead for Surface Decontamination*	0 (1)	0.095 (.208)
3.2 (3.3)	LA-W933	*Labpacks*	4	0.002
3.4 (3.5)	None	*Missing/non-existent/TBV*	0	(0.00095)

In this revision only

Section X.C.2.b. of Federal Facility Compliance Order (Los Alamos National Laboratory): Rationale for the proposed revision.

1. Removal of On-Site Treatment Skids.

Since 1996, DOE and UC have pursued off-site treatment and disposal as the primary means to reduce and eliminate on-site waste inventories. This strategy has been pursued because of the increased availability of off-site treatment and disposal capacity for MLLW. As a result of this strategy, LANL waste streams are being treated at commercial and government off-site treatment facilities well in advance of their compliance dates. In addition, off-site shipment has provided cost and time savings as compared to fabricating, permitting, and operating mobile treatment units on-site as DOE and UC had originally planned.

2. Addition of Gas Cylinders.

Addition of this waste to the STP covered inventory will allow LANL to ship the cylinders for treatment and disposal along with the other items in the applicable treatability groups.

3. Addition of On-Site Recycling/Re-use.

Recycling/Re-use reduces reliance on landfills and incinerators, reduces the potential impact on health and environment when harmful substances are removed from the waste stream, and conserves natural resources because it reduces the need for raw materials. On-site recycling and re-use options at LANL may reduce the STP waste inventory. These options would have the same net effect as off-site shipment for treatment and disposal, yet the environmental impact would be minimized. On-site recycling and re-use may also have the added benefit of reducing the generation of additional mixed waste in the future.

4. Notification for Off-Site Treatability Studies.

As discussed in DOE and UC's letter to the NMED dated August 29, 1996, treatability studies are used to explore alternative treatment options that may be practical for any or all of LANL's STP mixed waste streams. Notification ensures that the NMED has current information concerning DOE and UC's progress toward effective waste management. Notification also offers the opportunity to evaluate the potential for incidental waste treatment or secondary waste generation, which are often associated with treatability studies.

5. Provide Option of Shipping Covered Waste, Under Special Circumstances, Prior to Addition by Approved Revision.

This methodology would provide a mechanism for expediting treatment and disposal of covered waste, should a shipment already be planned. The ability to aggregate covered waste volumes into planned shipments would help DOE and UC manage wastes more efficiently and expeditiously by accelerating the final treatment and disposal of the waste and reducing its storage time. In addition to expediting the treatment and disposal of covered waste, this methodology offers an opportunity to treat covered waste that may not have other treatment options if it is not shipped with waste in the same treatability group. The following description illustrates the type of special circumstances where this option would be beneficial.

When DOE and UC are planning to ship STP waste to an off-site facility for treatment and disposal, quality assurance activities are conducted in preparation for the shipment. As packages are inspected, a discrepancy could be found between the waste volume included in the STP inventory and the verified quantity. If the actual waste volume is greater than the originally reported volume, an entire shipment would be delayed, or the additional volume would have to be removed from the drum and placed into storage, pending approval of a revision request. With the proposed methodology, the NMED would be notified of the additional covered waste, and upon the NMED's approval, the covered waste could be included with the planned shipment. The additional covered waste would still be included for addition in the next scheduled Annual Update and associated revision request.

6. Addition of Capability for On-Site Radiological Decontamination.

Removing the radiological contaminant from mixed low level waste would allow the waste to be recycled or for the waste to be declared hazardous without a radioactive component. STP waste could be declared hazardous without a radioactive component after approval by the NMED via the amended FFCO Section V.B process and a detailed internal evaluation by DOE. Once a waste package is allowed to be released from the site for management as nonradioactive material, a wider range of opportunities such as recycling/reuse or treatment and disposal of waste becomes available. STP wastes, if verified to be nonradioactive, could be treated cost-effectively using commercial hazardous waste treatment facilities. Radiological decontamination activities as a parallel preferred option could expedite the treatment and disposal of covered waste and reduce its storage time.

7. Modifications to tables in CPV Sections 3.1.1, 3.1.2 and proposed Section 2.3.

As requested in NMED's letter dated February 18, 1998, the following modifications are proposed in order to clarify the CPV and to ensure that the CPV is current. The reason for the change, as stated by NMED is because *"the compliance date for Activity B and A applies to Original CPV mixed waste inventory. Activity A completion is implicit for hazardous waste under the Resource and Recovery Conservation Act. Also this activity was not included as specific items in the compliance activity tables in Revision 1.0, where shipment as a parallel preferred option was added as a treatment option for the other Treatability Groups."*

The same modification would apply to Activity A in Tables III and IV in proposed Section 2.3.

8. Modifications to proposed CPV Section 3.1.11.

The addition of this table to proposed CPV Section 3.1.11 (currently CPV Section 3.2.1) is proposed in order to make this section consistent with other sections of the CPV. The table will also add clarification to the section. Removal of the milestone date of November 30, 1998, for the submittal of treatment or off-site shipment schedules and options for NMED's approval is proposed for deletion for consistency with other sections of the CPV.

9. Addition of Section 3.3.3 to the CPV.

This information is already included in the BV. The section is proposed for addition to the CPV for consistency.

10. Addition of Newly Identified STP Covered Waste.

Addition of this waste to the STP covered inventory will allow LANL to ship the waste for treatment and disposal along with the other items in the applicable treatability groups. A quality check of the database was made to find items that were covered waste but did not have assigned treatability groups. Most of the items were due to wastes which were found during the Sort, Survey, Decontamination (SSD) effort, but which were not included in the original STP inventory.

One item that was transferred to the *"Missing/nonexistent/TBV"* category in Revision 4/5 was included in the original STP inventory as 2 gal. This 2-gal. item was not found during SSD visual inspection activities. However, subsequent review of the data indicated that a 1-gal. item of this material had been found in the same drum. The data indicates that the original item should have been reported as two items, 1-gal each.

DOE and UC are proposing to transfer the one found item (1 gal.) to the treatability group LA-W908, *"Nonhalogenated Organic Liquids,"* from the *"Missing/nonexistent/TBV"* category. One item (1 gal.) would remain in the *"Missing/nonexistent/TBV"* category, however the volume in this category is proposed to be decreased to represent 1 gal. instead of 2 gal.

Another proposed volume adjustment pertains to a drum that was originally reported as lead shield with a volume of 30 gal., in the treatability group LA-W930, *"Lead for Surface Decontamination."* This drum was moved to TA-50 for decontamination and lead recycling. Upon opening the drum, it was determined to contain 55 gal. of lead shot. The increased volume of 25 gal. (0.095 cubic meters) is proposed for addition to the CPV as a correction to the original STP inventory. In addition, the entire waste volume of 55 gal. (0.208 cubic meters) is proposed for transfer to treatability group LA-W921, *"Activated or Inseparable Lead"*, because the waste was unable to be decontaminated and recycled as required under the existing treatability group.

Section X.C.2.c. of Federal Facility Compliance Order (Los Alamos National Laboratory): Anticipated length of any delay in performance.

No delay in performance is anticipated due to any of the requests made in this revision.

Section X.C.2.d. of Federal Facility Compliance Order (Los Alamos National Laboratory): Plan and schedule for implementing all reasonable measures.

All reasonable measures proposed could be implemented within the framework of the existing plan and schedule for the STP. No new milestone dates have been proposed in this revision.

Enclosure C

Certification Statement

ENCLOSURE C

CERTIFICATION

SITE TREATMENT PLAN (STP)
COMPLIANCE PLAN VOLUME (CPV)
LOS ALAMOS NATIONAL LABORATORY (LANL)
FEDERAL FACILITY COMPLIANCE ORDER (FFCO), OCTOBER 4, 1995

REVISION PROPOSAL NO. 7.0

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 — 23 June 1998

Kenneth M. Hargis
Program Manager
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator

Date Signed

June 24 1998

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

Compliance Plan Volume

Redline/Strikeout Version

1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN VOLUME.

1.1 Introduction.

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

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

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

1.2 Contents.

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

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

1.3 STP Revisions and Amendments.

The STP Compliance Plan Volume (CPV) has been modified several times since it was originally issued, in accordance with the provisions of Section X, "*Revisions,*" and Section XI, "*Other Amendments to the STP,*" of the October 4, 1995 Federal Facility Compliance Order (FFCO), as amended and revised. Appendix A to the CPV provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

2.0 Compliance Schedules.

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

2.1 Categories of Activities for Compliance Dates.

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

2.1.1 Plans Where Treatment Technology Exists.

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

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

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

2.1.2 Plans Where Technology Must Be Developed.

For some mixed waste, no treatment technologies have been identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated on-site, the categories of activities for compliance dates are identified in Table II and shall apply. Compliance dates for the activities identified in Table II may be found in Section ~~3.2~~ 3.1.

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

A. Identify and develop technology.
B. Submit permit application to NMED; or
C. Submit a Notification of Intent to perform treatability study to NMED a minimum of 45 days prior to commencement of the study.
D. Initiate construction as specified in the NMED.
E. Commence systems testing.
F. Begin treating mixed waste.
G. Complete treatment of existing wastes to applicable regulatory standards.

2.2 Primary Preferred Treatment.

Off-site treatment is the primary preferred treatment option applicable to all mixed waste streams in the STP inventory. All activities and compliance dates related to the construction, permitting, and operation of on-site treatment skids have been removed from this volume. This change is due to the increased availability of off-site treatment and disposal capacity for mixed waste. Respondents will continue evaluating new commercial and DOE off-site treatment facilities as potential options for managing mixed waste, as they become available.

~~2.1.4~~ 2.3 Plans for Mixed Waste to be Shipped Off-Site for Treatment.

~~In lieu of plans to treat mixed waste on-site,~~ The preferred alternative for DOE ~~may~~ to treat mixed waste is at an off-site facility (at a commercial or non-commercial mixed waste treatment facility), or DOE may ~~recycle waste at an off-site facility~~ pursue parallel treatment options such as recycling/re-use or radiological decontamination. Requirements for waste shipped off-site for recycling are discussed under CPV Section 2.6. ~~Should DOE elect to use off-site recycling facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in this Section in the same manner as if the waste was being shipped off-site for treatment. Any and all requirements imposed by the off-site treatment/recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by Respondents.~~

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to a non-commercial facility. Notification should be made if possible when DOE is first considering such an option to allow NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the

proposed off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility. Activities for mixed waste to be shipped off-site for treatment/recycling at a non-commercial facility are identified in Table ~~V.~~ IV.

Should DOE decide to treat or recycle waste at a commercial off-site facility, DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Table ~~IV~~. III. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Commercial facility.

~~A.~~	~~Meet all regulatory requirements for off-site shipment.~~
~~B.~~A.	Provide documentation to NMED that waste has been received at an off-site facility for treatment or recycling within 45 working days of receipt of waste at the treatment facility

~~2.1.4.1~~ 2.3.1 Specific Site Requirements for Non-commercial Treatment Facilities.

Shipment to Idaho National Engineering Laboratory.

Prior to shipment, Idaho National Engineering Laboratory and Idaho Division of Environmental Quality shall be notified of any pending shipments of waste prior to shipment should DOE ship mixed low-level waste to INEL. Proper procedures including additional approvals (if necessary) and documentation shall be completed prior to the shipment of wastes to INEL. Management of post-treatment waste residuals or newly generated waste streams will be in accordance with the requirements of DOE, the State of Idaho and that state where they will be disposed. A modification to LANL's RCRA permit providing for the return of such wastes and/or residues to LANL must be approved by NMED prior to any such return of wastes and/or residuals to LANL. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from INEL.

Shipments of low-level mixed wastes to planned facilities (not yet existing) will occur only after that treatment and schedules are approved by DOE-ID and the State of Idaho. Upon approval of the planned treatment facilities, the applicable protocol from the paragraph above will be implemented for mixed wastes to be treated at planned facilities.

Shipment to Oak Ridge Reservation.

In the case that Oak Ridge Reservation (ORR) may not dispose of mixed-waste residues or new waste streams generated from off-site treatment, and they cannot be sent to another facility for disposal, then the residues may return to LANL. Should residual or newly generated waste streams be returned to LANL, the proper permits for the State of New Mexico must exist. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from ORR.

Table ~~V.~~ IV. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Non-commercial facility.

A.	Request necessary approval from NMED for shipment of waste by category before shipping.
~~B.~~	~~Meet all regulatory requirements for off-site shipment.~~
~~C.~~ B.	Provide documentation to NMED of confirmation of shipment date within 14 working days prior to sending waste to an off-site facility for treatment, disposal, or recycling, or storage pending treatment, disposal, or recycling.
~~D.~~ C.	Provide documentation to NMED that waste has been received at an off-site facility for treatment within 45 working days of receipt of waste at the off-site facility.
E. D.	Meet all regulatory requirements to include RCRA Permit modifications for residual or newly generated waste streams after treatment or recycling.
~~F.~~ E.	Provide documentation to NMED within 30 working days after receipt of residual or newly generated waste streams upon return to LANL.

~~2.1.3~~ 2.4 Requirements Pertaining to Radionuclide Separation.

The FFC Act sets additional requirements in cases in which DOE intends to conduct radionuclide separation of mixed waste. Should the DOE determine to do radionuclide

separation of such mixed waste, DOE will schedule specific compliance dates based on category activities identified in Table ~~II~~ V. "Radionuclide separation" shall mean segregating the radioactive portion of the mixed waste from the hazardous portion of the mixed waste.

Table ~~II.~~ V. Categories of Activities for Compliance Dates for Radionuclide Separation of Mixed Waste.

A.	Complete an estimate of the volume of waste generated by each case of radionuclide separation.
B.	Complete an estimate of the volume of waste that would exist or be generated without radionuclide separation.
C.	Complete an estimate of the costs of waste treatment and disposal if radionuclide separation is used compared with the estimated costs if it is not used.
D.	Provide the assumptions underlying such estimates of waste volumes and cost estimates.
E.	Provide characterization methodologies for determining waste type.
F.	Submit a plan for treating or managing hazardous waste residues, accompanied by a NMED permit application.

~~2.1.5~~ 2.5 Plans Related to Other Mixed Waste Activities.

1. Activities other than the types of activities specifically called for in the FFC Act as requiring schedules are described in this STP. Some of these activities may be associated with schedules which may contain compliance dates related to treatment of the DOE's mixed waste.

2. For mixed waste which is not sufficiently characterized to allow identification of appropriate treatment, notification of the characterization of such waste shall be in accordance with the annual update process described in the Compliance Order. If such characterization results in the addition or deletion of a treatability group or an increase in volume in a treatability group, a revision would be required pursuant to Section X of the Compliance Order.

3. DOE will notify the NMED when off-site treatability studies are conducted on STP waste. Treatability studies are used to explore alternative treatment options that may be practical for any or all of the STP mixed waste streams. When preparing waste for shipment for an off-site treatability study, DOE will evaluate the potential for incidental waste treatment or secondary waste generation, which are often associated with treatability studies.

4. DOE will notify the NMED when an expedited treatment opportunity is anticipated. An expedited treatment opportunity arises when covered waste can be added to a planned off-site shipment rather than storing the waste for separate shipment pending formal addition in an approved revision. Under these special circumstances, the waste could be shipped after the NMED confirms that the expedited treatment is acceptable. The covered waste will be included for addition in the Respondent's annual revision request.

2.6 Recycling/Re-Use.

Respondent will pursue on-site or off-site recycling/re-use as a parallel preferred option. Recycling/re-use reduces reliance on landfills and incinerators, reduced the potential impact on health and environment when harmful substances are removed from the waste stream, and conserves natural resources because it reduces the need for raw materials. Recycling/re-use has the same net effect as off-site shipment for treatment and disposal.

Should DOE elect to use off-site recycling facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3 in the same manner as if the waste were shipped off-site for treatment. Any and all requirements by the off-site treatment/recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by Respondents.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

2.7 On-Site Radiological Decontamination.

DOE will pursue on-site radiological decontamination as a preferred option. Radiological decontamination includes activities such as sand blasting, hand-scrubbing, or electrolytic decontamination. These decontamination activities could result in reducing or removing the radiological contaminant from the waste such that the waste could be recycled in accordance with CPV Section 2.6 or released as a non-radioactive hazardous material in accordance with Section V.B of the amended FFCO .

3.0 MIXED LOW-LEVEL ~~MIXED~~ WASTE STREAMS.

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

The original October 4, 1995 STP inventory in each MLLW treatability group has been modified through the revision process in the FFCO. The table in CPV Appendix B provides a comprehensive summary of changes to the CPV covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of this revision. In Appendix B, the original STP inventory in each MLLW treatability group is denoted as subgroup 0 of that treatability group (e.g., the original volume of STP treatability group LA-W906 became LA-W906-0). Each revision that has since added volumes to individual treatability groups has resulted in creation of an additional subgroup, having the same number as the revision (e.g., LA-W906-4 was created in Revision 4.0, and LA-W906-5 was created in Revision 5.0).

In most Sections of this chapter, the subgroups of the treatability groups are not shown. In those cases, the Activities and Compliance Dates are applicable to the entire net volume of that treatability group. However, when subgroups of a treatability group have been assigned Activities and Compliance Dates unique to that subgroup, those subgroups are detailed in the text. For a complete listing of volumes by subgroup for all treatability groups, please refer to Appendix B.

3.1 Mixed Waste Streams. ~~for Which Technology Exists~~

The following subsections summarize MLLW treatability groups. ~~for which technology exists~~

3.1.1 ~~Off-site Treatment by Thermal Treatment~~ IPA Wastes and Scintillation Fluids.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
IPA wastes	LA-W901	D001, D009, F002, F003, F005	0	0.00
scintillation fluids	LA-W902	D001, F003, F005	0	0.00
Totals			**0**	**0.00**

Treatment:

The waste will be treated at an off-site facility that combusts organic liquid waste. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
~~A. Meet all regulatory requirements prior to shipping waste~~	~~9/30/96~~
~~B.~~ A. Complete shipping waste	12/30/96*
~~C.~~ B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

*This activity date refers to the applicable waste in the original treatabilility group. Please note that one of the items in the original Treatability Group LA-W901 was transferred to Treatability Group LA-W906, in Revision 5.0, approved 12/29/97 by NMED.

3.1.2 ~~Off-site Treatment by Stabilization or Macroencapsulation~~ Lead Blankets, Soil with Heavy Metals, ER Soils.

Treatability Group(s):

~~**LLMW for Stabilization**~~

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (M^3)
lead blankets	LA-W903	D007, D008	0	0.00
soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	3	0.45
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	0	0.00
Totals			**3**	**0.45**

Treatment:

The waste will be treated at an off-site facility that stabilizes or macroencapsulates wastes. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
~~A. Meet all regulatory requirements prior to shipping waste~~	~~05/30/97~~
~~B~~.A. Complete shipping waste or complete parallel option	12/30/98
~~C~~.B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.3 ~~Evaporative Oxidation (MWIR Treatment ID GJ-S801C)~~ Aqueous Organic Liquids.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
aqueous organic liquids	LA-W906-0 LA-W906-4 LA-W906-5	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	173	10.32
Totals			**173**	**10.32**

Note: See below for additional wastes in this treatability group

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site treatment facility (commercial or non-commercial) and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

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

~~E.~~A. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	02/09/00
~~F.~~B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes.

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
aqueous organic liquids	LA-W906-6	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	88	5.74
Totals			**88**	**5.74**

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Dates
~~G~~C. Complete shipment of existing wastes for treatment to an off- site facility or complete parallel option	2/09/03
~~H~~.D. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.4 ~~Thermal Desorption (MWIR Treatment ID GJ-S801B)~~ Organic-Contaminated Combustible Solids.

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

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
organic-contaminated combustible solids	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	~~381~~ 382	36.07
Totals			**~~381~~ 382**	**36.07**

~~LLMW for Thermal Desorption~~

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D018, D019, D020, D022, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D042, D043, F001, F002, F003, F004, F005	~~227~~ 231	27.31
Totals			**~~227~~ 231**	**27.31**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing

as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
~~A. Submit permit application, amendment or modification to NMED~~	~~11/16/98~~
~~B. Initiate construction~~	~~As specified in the NMED permit~~
~~C. Complete system testing and commence operations and begin treating mixed waste~~	~~02/01/01~~
~~D. Complete treatment of existing wastes to applicable regulatory standards, or~~	~~02/14/02~~
~~E.~~ A. Complete shipping of existing wastes to an off- site treatment facility or complete parallel option	02/14/02
~~F.~~ B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.5 ~~Macroencapsulation (MWIR Treatment ID PX-S803)~~ Combustible Debris, Activated or Inseparable Lead, Noncombustible Debris.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
combustible debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	~~103~~ 105	15.17
Totals			**~~103~~ 105**	**15.17**

~~LLMW for Macroencapsulation~~

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
activated or inseparable lead	LA-W921	D008	~~34~~ 35	~~7.09~~ 7.30
noncombustible debris	LA-W922	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	191	36.46
Totals			**~~225~~ 226**	**~~43.55~~ 43.76**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
~~A. Submit permit application, amendment or modification to NMED~~	~~01/04/98~~
~~B. Initiate construction~~	~~As specified in the NMED permit~~
~~C. Complete system testing and commence operation and begin treating mixed waste~~	~~02/01/00~~
~~D. Complete treatment of existing wastes to applicable regulatory standards, or~~	~~08/25/00~~
~~E.~~A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	08/25/00
~~F.~~B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.6 ~~Chemical Plating Waste Treatment Skid (MWIR Treatment ID LA-S004)~~ Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
aqueous wastes with heavy metals	LA-W913	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011	139	3.07
corrosive solutions	LA-W914	D001, D002	197	1.21
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	23	0.17
Totals			**359**	**4.45**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
~~A. Resubmit revised permit application to NMED~~	~~10/30/96~~
~~B. Initiate construction~~	~~As specified in the NMED permit~~
~~C. Complete system testing and commence operations and begin treating mixed waste~~	~~03/17/00~~
~~D. Complete treatment of existing wastes to applicable regulatory standards, or~~	~~05/08/01~~
~~E~~.A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	05/08/01
~~F~~.B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.7 Water-Reactive Metals. ~~Treatment Skid (MWIR Treatment ID LA-S003)~~

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
water-reactive wastes	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	113	7.05
Totals			**113**	**7.05**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
~~A. Submit permit application, amendment or modification to NMED~~	~~06/30/01~~
~~B. Initiate construction~~	~~As specified in the NMED permit~~

~~C. Complete system testing and commence operations and begin treating mixed waste~~	~~09/09/03~~
~~D. Complete treatment of existing wastes to applicable regulatory standards, or~~	~~04/21/04~~
~~E~~.A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	04/21/04
~~F~~.B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.8 ~~Gas-scrubbing Skid (MWIR Treatment ID LA-S801)~~ Compressed Gases Requiring Scrubbing.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	~~13~~ 25	~~0.35~~ 0.63
Totals			**~~13~~ 25**	**~~0.35~~ 0.63**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
~~A. Submit permit application, amendment or modification to NMED~~	~~03/10/98~~
~~B. Initiate construction~~	~~As specified in the NMED permit~~
~~C. Complete system testing and commence operations and begin treating mixed waste~~	~~05/10/02~~
~~D. Complete treatment of existing wastes to applicable regulatory standards, or~~	~~08/28/03~~
~~E.~~A. Complete shipping of existing wastes to an off- site treatment facility or complete parallel option	08/28/03
~~F.~~B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.9 ~~Gas Oxidation Skid (MWIR Treatment ID LA-S801)~~ Compressed Gases Requiring Oxidation.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
compressed gases requiring oxidation	LA-W918	D001, U226	~~177~~ 192	~~1.32~~ 1.78
Totals			**~~177~~ 192**	**~~1.32~~ 1.78**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated on-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

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

~~F.~~B.	Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.10 ~~Mercury Amalgamation (MWIR Treatment ID PI-S801)~~ Elemental Mercury.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
elemental mercury	LA-W920	D006, D009, F005	79	0.66
Totals			**79**	**0.66**

Treatment:

~~The waste will be treated in a mobile treatment unit that will be fabricated off-site and operated on-site.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
~~A. Submit permit application, amendment or modification to NMED~~	~~01/30/98~~
~~B. Initiate construction~~	~~As specified in the NMED permit~~
~~C. Complete system testing and commence operations and begin treating mixed waste~~	~~06/05/00~~
~~D. Complete treatment of existing waste to applicable regulatory standards, or~~	~~11/15/00~~
~~E~~.A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	11/15/00
~~F~~.B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

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

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

~~3.2.1 Hydrothermal Processing~~

3.1.11 Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components, Liquid and Solid Oxidizers.

Treatability Group(s):

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

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
halogenated organic liquids	LA-W907	D001, D002, D003, D007, D009, D010, D011, D018, D019, D022, D028, D029, D035, D043, F001, F002, F003, F004, F005, U077, U080, U226, U227, U228, U236	~~525~~ 537	~~18.26~~ 18.30
nonhalogenated organic liquids	LA-W908	D001, D002, D003, D004, D007, D008, D009, D011, D018, D038, D040, F002, F003, F004, F005, U002, U019, U154, U169, U188, U220, U246	~~843~~ 899	~~20.20~~ 20.22
bulk oils	LA-W909	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	45	5.81
PCB wastes with RCRA components	LA-W910	D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D019, D027, D028, D030, D031, D032, D033, D034, D036, D039, D042, D043, F002, F003, F004, F005	40	2.75
Totals			**1453**	**47.02**

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
Liquid and solid oxidizers	LA-W923	D001, D003, D005	93	1.37
Totals			**93**	**1.37**

Treatment:

~~The preferred destruction treatment technology option for this treatability group is Hydrothermal Processing which is a technology that needs development for adaptation to treat radioactive and PCB-bearing waste. This treatment technology is being adapted at LANL and is~~

~~expected to be developed into a mobile treatment unit. The GJPO schedule for deployment of the unit indicates its possible availability to LANL after February 2002.~~ Shipment off-site for treatment is ~~a parallel~~ the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. ~~Respondents shall submit treatment or off-site shipment schedules and options for NMED's approval by November 30, 1998. Treatment or other options other than off-site shipment shall be carried out pursuant to the revision process.~~ Off-site shipments must be completed by February 2002.

Should DOE decide to treat waste at an off-site non-commercial facility ~~in lieu of plans to treat such waste on-site,~~ the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

	Activity	Compliance Dates
A.	Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	02/01/02
B.	Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

~~3.3~~ 3.2 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done ~~(MWIR Treatment ID LA-S701)~~

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
lead wastes - TBD	LA-W924	D003, D008	129	40.16
mercury wastes - TBD	LA-W925-0	D007, D008, D009, F001	63	18.30
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	10	1.25
biochemical laboratory wastes	LA-W927	D001, D003	9	1.34
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	61	12.71
Totals			**272**	**73.76**

Note: See below for additional wastes in some of these treatability groups

Treatment:

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

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

Activities for wastes originally belonging to these treatability groups as listed above.

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

E. Complete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/00
F. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes and treatability groups:

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA Codes	Number of items	Net volume (m3)
mercury wastes-TBD	LA-W925-4 LA-W925-5 LA-W925-6	D003, D007, D008, D009, F001, F002, F005	74	2.61
explosives	LA-W932	D003	1	0.000001
labpacks	LA-W933	D001, D002, D003, D004, D005, D006, D007, D008, D010, F003, F005, D011, P012, P029, P098, P106, P113, P120, U131, U144, U145, U188, U190, U204, U216, U219	~~149~~ 153	0.30
Totals			**~~224~~ 228**	**2.91**

Activities for wastes belonging to these treatability groups and subgroups.

Activity	Compliance Dates
G. Complete sampling and analysis plan	1/30/99
H. Complete sampling and analysis	9/30/01

I. Complete determination of treatment options	12/20/01
J. Complete shipping of wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/03
K. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at off-site facility or within 45 days after completion of parallel option

~~3.4~~ 3.3 Plans for Other Types of Activities.

The following subsection summarizes plans for other types of activities.

~~3.4.1~~ 3.3.1 Lead Decontamination ~~(MWIR Treatment ID LA-S001)/Off-site Treatment (preferred option)~~

Treatability Group(s):

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m^3)	No. Items	Net volume (m^3)	No. Items	Net volume (m^3)
lead for surface contamination	LA-W930-0 LA-W930-5	0	0.00	134	49.19	~~134~~ 133	~~49.19~~ 49.08
Totals		**0**	**0.00**	**134**	**49.19**	**~~134~~ 133**	**~~49.19~~ 49.08**

Note: See below for additional wastes in this treatability group

Treatment:

This treatability group contains two categories of lead for decontamination:

- The first category is lead in the original LA-W930-0 inventory that is amenable to decontamination in the on-site lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The trailer is on-site and has operated, but needs an upgrade for prolonged operation.

- The lead in the second category is lead in the original LA-W930-0 inventory that is not amenable to decontamination in the on-site lead decontamination trailer, plus subsequent additions to the original inventory shown in Appendix B. This lead will be processed using other on-site decontamination processes, such as dry sandblasting or hand-scrubbing, or sent to off-site lead decontamination services.

Any lead not acceptable for on-site or off-site lead decontamination, plus any lead unsuccessfully decontaminated, will be designated for treatment and disposal at an off-site facility, or for recycle through an off-site capability, such as metal melting to create shielding blocks or a DOE lead bank. Non-conforming items will be reassigned to appropriate treatability groups in accordance with the FFCO.

Should DOE decide to treat or recycle waste at an off-site non-commercial facility in lieu of plans to treat or recycle such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment/recycle option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment/ recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Lead shapes and forms in the first category.

Activity	Compliance Date
A. Complete lead decontamination	09/30/97

Lead shapes and forms in the second category.

Activity	Compliance Date
A. Provide schedule for development of lead processing techniques and options	06/30/96
B. Segregate lead waste into decontamination groupings	07/31/97
C. Complete shipment of wastes to decontamination operations, or	12/02/98
D. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/98
E. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/99

F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

The following additional wastes will require management in the second category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m^3)	No. Items	Net volume (m^3)	No. Items	Net volume (m^3)
lead for surface contamination	LA-W930-6	0	0.00	14	12.06	14	12.06
Totals		**0**	**0.00**	**14**	**12.06**	**14**	**12.06**

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Date
G. Complete shipment of wastes to decontamination operations, or	12/02/99

H. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/00
J. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

~~3.4.2~~ 3.3.2 Sorting, Surveying, and Decontamination. ~~(MWIR Treatment ID GJ-S804)~~

Treatability Group(s):

Treatability group	MWIR waste ID	Number of items	Net volume (m^3)
~~1.~~ nonradioactive or suspect waste items to be surveyed	LA-W929-0(1)	0	0.0
~~2.~~ nonradioactive or suspect waste items to receive RCRA and radiological characterization	LA-W929-0(2)	0	0.00
~~3.~~ nonradioactive or suspect waste items that cannot or should not be sampled	LA-W929-0(3)	0	0.0
Totals		**0**	**0.00**

Note: See below for additional wastes in this treatability group

Treatment:

The waste items in part 1 of the original volume in this treatability group will be surveyed using a field operation that will survey waste suspect of radioactive contamination to determine whether it is radioactively contaminated. The work will be done on-site with equipment and staffing provided by LANL or another DOE site. Waste determined not to be radioactively contaminated will be treated using commercial facilities permitted to treat hazardous waste; waste determined to be radioactively contaminated will be assigned to applicable treatability groups and/or sent to offsite facilities for appropriate treatment.

Waste items in part 2 of this treatability group will be surveyed using complete RCRA and radiological sampling and characterization. Waste sampled under this alternative will be treated

and disposed as low-level mixed waste; the waste will be assigned to applicable treatability groups and/or sent to off-site facilities for appropriate treatment based on the results of this characterization.

Sampling for this characterization alternative will be conducted in accordance with RCRA SW-846 methods. To ensure an adequate volume of waste material is available for sampling and to maximize the cost effectiveness of the sampling activities, some lab packed and other waste items may be bulked into larger volume containers; all RCRA waste codes will be transferred to the bulked wastes to ensure correct RCRA categorization is maintained. It may be found, when preparing a given drum for sampling, (for example, solid small volume waste items that cannot be sampled in accordance with EPA SW-846 methods) are in fact not amenable to sampling and should have been included in the item count for group 3 . If visual inspection so indicates, these waste items will be transferred to Group 3 and assigned to applicable treatability groups based on existing knowledge.

Waste items in part 3 of this treatability group which are confirmed not amenable to sampling (e.g., lead-acid batteries, spray paint cans) will be assigned to applicable treatability groups based on existing knowledge. It may be found, when inspecting a given drum, that some items can in fact be sampled in accordance with EPA SW-846 methods and should have been included in the item count for Group 2. If visual inspection so indicates, these waste items will be transferred to Group 2 and sampled accordingly.

Additional compliance dates will be proposed for any waste items in this treatability group found not to have available treatment/disposal options following a complete review of all survey, analytical, or visual inspection data obtained through these processes.

For all waste items in this treatability group, shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment

facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within (45) working days of receipt of waste at the treatment facility.

Activities for waste items in part 1 of this treatability group.

Activity	Compliance Dates
A. Complete field survey	10/30/96
B. Submit documentation declaring waste items as nonradioactive, or submit documentation assigning waste items to applicable treatability groups	2/28/97
C. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 2 of this treatability group.

Activity	Compliance Dates
D. Complete RCRA and radiological sampling	1/28/97
E. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	2/28/97
F. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 3 of this treatability group.

Activity	Compliance Dates
G. Complete visual verification	1/28/97
H. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	6/30/97
I. Propose additional compliance dates if necessary	9/30/97

Additional wastes:

Treatability group	MWIR waste ID	Number of items	Net volume (m^3)
Nonradioactive or suspect waste items	LA-W929-5	0	0.00
Totals		**0**	**0.00**

Activities for items added as subgroup 5 of this treatability group.

Activity	Compliance Dates
J. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	3/31/98
K. Propose additional Compliance Dates if necessary	3/31/98

3.3.3 Lead Requiring Sorting.

Treatability Group(s):

Treatability Group	MWIR waste ID	RCRA Codes	Number of Items	Net Volume (m^3)
Lead requiring sorting	LA-W931	D008	12	1.08
Totals			**12**	**1.08**

Treatment:

Wastes in this treatability group are generally heterogeneous and will require different treatment processes. Drums will be opened, the contents removed, and the waste repackaged based on appropriate treatment requirements. Wastes in this treatability group are primarily lead pieces, lead shot, and lead-contaminated soils that have been packaged in the same drum.

The wastes will be reclassified to the applicable treatability group after physical separation and repackaging. The wastes will be treated by appropriate technology.

Activities for waste items in this treatability group.

Activity	Compliance Dates
A. Complete sorting	06/01/01
B. Submit documentation assigning waste items to applicable treatability groups. Propose additional compliance dates, if necessary, or	06/01/03
C. Complete shipment of existing waste to off-site facility for treatment, or complete parallel options.	06/01/03

~~3.5~~ 3.4 Management of "Missing" Items.

Waste Category:

Category	MWIR waste ID	No. Items	Net volume (m^3)
Missing/nonexistent/TBV	None	48	8.81
Totals		**48**	**8.81**

Treatment:

During visual inspections and sampling activities in support of STP waste work-off, occasionally an item cannot be found, or it is not located in the containers in which it is expected to be, according to the LANL data files for the waste item. In some instances, such items could not be verified as having ever been received in storage at LANL, and further follow-up investigations of the record files revealed that for various reasons, the waste items were never in fact generated, although on paper they were included in the original STP inventory.

In these instances, DOE and UC, and their contractors, perform a thorough inspection of both the physical inventories and the data files. When DOE and UC determine that an STP covered waste item does not exist, transfer of the item to the category called *"Missing/ nonexistent/TBV (*to be verified*)"*, is requested through the revision process associated with the next *Annual Update.*

DOE and UC will re-verify the absence of all *"Missing/ nonexistent/TBV"* items container-by-container, as each STP waste item is being sampled, repackaged, or otherwise prepared for on- or off-site treatment. The final verification that all *"Missing/ nonexistent/TBV"* items do not in fact exist will be completed by April 21, 2004, at which time all remaining MLLW items in the original STP inventory will have been treated. At that time, DOE and UC will request deletion of all items having been fully verified as missing or nonexistent.

At any time during the re-verification process, should any of these items be discovered to exist, NMED will be notified, and approval will be requested for assignment of the rediscovered items to the appropriate TG. If necessary, they will be assigned new Activities and Compliance Dates, in accordance with the terms of the FFCO.

The following steps will be taken to verify presence or absence of this waste:

Activity	Compliance Dates
A. Initiate re-verification process on a shipment-by-shipment basis	01/03/98
B. Complete re-verification process	04/21/04
C. Re-assign any existing items to appropriate treatability groups	04/21/04
D. Complete treatment of existing wastes to applicable regulatory standards, or	10/30/04
E. Complete shipping of existing wastes to an off-site treatment facility	10/30/04
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

4.0 MIXED TRANSURANIC WASTE.

Treatment Group(s):

Assorted Mixed Transuranic Waste

Treatment Technology:

Respondents are required to develop treatment technologies and treat mixed transuranic (MTRU) waste at LANL according to the schedule set forth below:

Activity	Compliance Date
A. Development of treatment technologies	June 30, 1999
B. Submit permit application amendment or modification to NMED for treatment of MTRU	December 31, 1999
C. Begin treating MTRU	Six (6) months after NMED permit issuance
D. Complete treatment of existing MTRU to applicable regulatory standards	December 31, 2010

The above schedule is not based on the assumption that WIPP will be a disposal option or that DOE will receive a variance from treatment standards for land disposal of MTRU waste to be disposed at WIPP. All revisions to compliance dates shall be in accordance with the procedures set forth in the compliance order.

CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "*Revisions,*" and Section XI, "*Other Amendments to the STP,*" of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been ~~six~~ seven revisions and two amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's STP *Annual Update,* and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	*12/29/97*	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	*12/29/97*	Added volumes reported in FY95 and FY96 *Annual Updates* (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	*(to be added)*	Added volumes reported in FY97 *Annual Update* to several treatability groups, added Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	*(to be added)*	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies, provided option for shipping covered waste, under special circumstances, prior to addition by approved revision.

CPV APPENDIX B.
SUMMARY OF CPV INVENTORY CHANGE.S

The following tables provide a comprehensive summary of changes to the CPV covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of this revision. The volumes given in the tables reflect changes to the individual MLLW treatability group volumes due to increases or decreases, as noted. Table B-1 reports the inventory changes arising from Revisions 6.0 and 7.0, while Table B-2 reports the inventory changes previously approved in Revision 4.0/5.0.

Key to Reading the Subgroups.

The original STP inventory in each MLLW treatability group is now denoted as subgroup -0 of that treatability group (e.g., the original volume of STP treatability group LA-W906 became LA-W906-0). The original October 4, 1995 STP inventory in each MLLW treatability group has been modified through the revision process in the FFCO. The following revisions have affected volumes in individual treatability groups to date:

Revision	Effect on Volumes
Rev. 2.0	Reduced volume of LA-W928
Rev. 3.0	Divided original volume of LA-W929 into three subgroups
Rev. 4.0	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added new treatability groups
Rev. 5.0	Increased and decreased volumes in several treatability groups
Rev. 6.0	Increased and decreased volumes in several treatability groups, transferred the volume in LA-W929-5 to another treatability group
Rev. 7.0	Adjusted volumes in several treatability groups

Each revision that has added volumes to individual treatability groups has resulted in creation of an additional subgroup of that treatability group, having the same number as the revision (e.g., LA-W906-4 was created in Revision 4.0, and LA-W906-5 was created in Revision 5.0).

Additions and Deletions to Date.

To date, MLLW inventory increases and decreases have been incorporated into the covered waste inventories through Revisions 2.0, 4.0, 5.0, ~~and~~ 6.0, and 7.0. Revision 2.0 incorporated decreases in treatability group LA-W928 due to deletion of covered waste items. Rev. 4.0 resulted in decreases to LA-W929 and increases in other TGs, primarily by transferring LA-W929 items to other TGs. Rev. 5.0 and 6.0 resulted in both additions to and deletions of covered waste volumes (i.e., increases and decreases) in a number of TGs. Therefore, the Appendix B tables that follow show that subgroups -4, -5, ~~and~~ -6 and -7 exist for some treatability groups, but not for all.

These tables provide a master list of MLLW inventory changes presented in the *Annual Updates,* to enable users of the STP to track all changes in the LANL MLLW covered waste inventory that occurred since the original STP inventory was established in the October 4, 1995 FFCO/CPV.

Changes (additions or deletions) to the CPV covered waste inventory have occurred since the end of FY97. However, only those reported as of Rev. 6.0 and Rev. 7.0 are included in this table. All others will be reported in the next *Annual Update* and associated revision request. Therefore, the *"Net Covered Waste Inventory"* may not fully reflect the actual CPV covered waste inventory as of the date of this revision, in some instances.

Enclosure B

Compliance Plan Volume

Clean Copy Version

1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN VOLUME.

1.1 Introduction.

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

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

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

1.2 Contents.

The STP contains two volumes and is intended to bring Respondents into compliance with LDR storage prohibitions under the HWA and RCRA. The Compliance Plan Volume of the STP provides overall schedules, including compliance dates, for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL. The Compliance Plan includes aschedule for off-site transportation for treatment, or completion of parallel options, and the

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

1.3 STP Revisions and Amendments.

The STP Compliance Plan Volume (CPV) has been modified several times since it was originally issued, in accordance with the provisions of Section X, "*Revisions,*" and Section XI, "*Other Amendments to the STP,*" of the October 4, 1995 Federal Facility Compliance Order (FFCO), as amended and revised. Appendix A to the CPV provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

2.0 Compliance Schedules.

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

2.1 Categories of Activities for Compliance Dates.

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

2.1.1 Plans Where Treatment Technology Exists. For most of the mixed waste, treatment technologies have been identified and developed. For the waste that will be treated on-site, the categories of activities for compliance dates identified in Table I shall apply.

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

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

2.1.2 Plans Where Technology Must Be Developed.

For some mixed waste, no treatment technologies have been identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated on-site, the categories of activities for compliance dates are identified in Table II and shall apply. Compliance dates for the activities identified in Table II may be found in Section 3.1.

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

A. Identify and develop technology.
B. Submit permit application to NMED; or
C. Submit a Notification of Intent to perform treatability study to NMED a minimum of 45 days prior to commencement of the study.
D. Initiate construction as specified in the NMED.
E. Commence systems testing.
F. Begin treating mixed waste.
G. Complete treatment of existing wastes to applicable regulatory standards.

2.2 Primary Preferred Treatment.

Off-site treatment is the primary preferred treatment option applicable to all mixed waste streams in the STP inventory. All activities and compliance dates related to the construction, permitting, and operation of on-site treatment skids have been removed from this volume. This change is due to the increased availability of off-site treatment and disposal capacity for mixed waste. Respondents will continue evaluating new commercial and DOE off-site treatment facilities as potential options for managing mixed waste, as they become available.

2.3 Plans for Mixed Waste to be Shipped Off-Site for Treatment.

The preferred alternative for DOE to treat mixed waste is at an off-site facility (at a commercial or non-commercial mixed waste treatment facility), or DOE may pursue parallel treatment options such as recycling/re-use or radiological decontamination. Requirements for waste shipped off-site for recycling are discussed under CPV Section 2.6.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to a non-commercial facility. Notification should be made if possible when DOE is first considering such an option to allow NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility. Activities for mixed waste to be shipped off-site for treatment/recycling at a non-commercial facility are identified in Table IV.

Should DOE decide to treat or recycle waste at a commercial off-site facility, DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Table . III. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Commercial facility.

A.	Provide documentation to NMED that waste has been received at an off-site facility for treatment or recycling within 45 working days of receipt of waste at the treatment facility

2.3.1 Specific Site Requirements for Non-commercial Treatment Facilities.

Shipment to Idaho National Engineering Laboratory.

Prior to shipment, Idaho National Engineering Laboratory and Idaho Division of Environmental Quality shall be notified of any pending shipments of waste prior to shipment should DOE ship mixed low-level waste to INEL. Proper procedures including additional approvals (if necessary) and documentation shall be completed prior to the shipment of wastes to INEL. Management of post-treatment waste residuals or newly generated waste streams will be in accordance with the requirements of DOE, the State of Idaho and that state where they will be disposed. A modification to LANL's RCRA permit providing for the return of such wastes and/or residues to LANL must be approved by NMED prior to any such return of wastes and/or residuals to LANL. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from INEL.

Shipments of low-level mixed wastes to planned facilities (not yet existing) will occur only after that treatment and schedules are approved by DOE-ID and the State of Idaho. Upon approval of the planned treatment facilities, the applicable protocol from the paragraph above will be implemented for mixed wastes to be treated at planned facilities.

Shipment to Oak Ridge Reservation.

In the case that Oak Ridge Reservation (ORR) may not dispose of mixed-waste residues or new waste streams generated from off-site treatment, and they cannot be sent to another facility for disposal, then the residues may return to LANL. Should residual or newly generated waste streams be returned to LANL, the proper permits for the State of New Mexico must exist. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within

thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from ORR.

Table IV. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Non-commercial facility.

A.	Request necessary approval from NMED for shipment of waste by category before shipping.
B.	Provide documentation to NMED of confirmation of shipment date within 14 working days prior to sending waste to an off-site facility for treatment, disposal, or recycling, or storage pending treatment, disposal, or recycling.
C.	Provide documentation to NMED that waste has been received at an off-site facility for treatment within 45 working days of receipt of waste at the off-site facility.
. D.	Meet all regulatory requirements to include RCRA Permit modifications for residual or newly generated waste streams after treatment or recycling.
. E.	Provide documentation to NMED within 30 working days after receipt of residual or newly generated waste streams upon return to LANL.

2.4 Requirements Pertaining to Radionuclide Separation.

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

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

A.	Complete an estimate of the volume of waste generated by each case of radionuclide separation.
B.	Complete an estimate of the volume of waste that would exist or be generated without radionuclide separation.
C.	Complete an estimate of the costs of waste treatment and disposal if radionuclide separation is used compared with the estimated costs if it is not used.
D.	Provide the assumptions underlying such estimates of waste volumes and cost estimates.
E.	Provide characterization methodologies for determining waste type.
F.	Submit a plan for treating or managing hazardous waste residues, accompanied by a NMED permit application.

2.5 Plans Related to Other Mixed Waste Activities.

1. Activities other than the types of activities specifically called for in the FFC Act as requiring schedules are described in this STP. Some of these activities may be associated with schedules which may contain compliance dates related to treatment of the DOE's mixed waste.

2. For mixed waste which is not sufficiently characterized to allow identification of appropriate treatment, notification of the characterization of such waste shall be in accordance with the annual update process described in the Compliance Order. If such characterization results in the addition or deletion of a treatability group or an increase in volume in a treatability group, a revision would be required pursuant to Section X of the Compliance Order.

3. DOE will notify the NMED when off-site treatability studies are conducted on STP waste. Treatability studies are used to explore alternative treatment options that may be practical for any or all of the STP mixed waste streams. When preparing waste for shipment for an off-site treatability study, DOE will evaluate the potential for incidental waste treatment or secondary waste generation, which are often associated with treatability studies.

4. DOE will notify the NMED when an expedited treatment opportunity is anticipated. An expedited treatment opportunity arises when covered waste can be added to a planned off-site shipment rather than storing the waste for separate shipment pending formal addition in an approved revision. Under these special circumstances, the waste could be shipped after the NMED confirms that the expedited treatment is acceptable. The covered waste will be included for addition in the Respondent's annual revision request.

2.6 Recycling/Re-Use.

Respondent will pursue on-site or off-site recycling/re-use as a parallel preferred option. Recycling/re-use reduces reliance on landfills and incinerators, reduced the potential impact on health and environment when harmful substances are removed from the waste stream, and conserves natural resources because it reduces the need for raw materials. Recycling/re-use has the same net effect as off-site shipment for treatment and disposal.

Should DOE elect to use off-site recycling facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3 in the same manner as if the waste were shipped off-site for treatment. Any and all requirements by the off-site treatment/recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by Respondents.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

2.7 On-Site Radiological Decontamination.

DOE will pursue on-site radiological decontamination as a preferred option. Radiological decontamination includes activities such as sand blasting, hand-scrubbing, or electrolytic decontamination. These decontamination activities could result in reducing or removing the radiological contaminant from the waste such that the waste could be recycled in accordance with CPV Section 2.6 or released as a non-radioactive hazardous material in accordance with Section V.B of the amended FFCO .

3.0 MIXED LOW-LEVEL WASTE STREAMS.

This Chapter presents the preferred options to treat mixed low-level waste streams (MLLW, formerly known as LLMW) at LANL. All preferred options not described below must be approved by NMED in accordance with the revision process pursuant to the Compliance Order.

The original October 4, 1995 STP inventory in each MLLW treatability group has been modified through the revision process in the FFCO. The table in CPV Appendix B provides a comprehensive summary of changes to the CPV covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of this revision. In Appendix B, the original STP inventory in each MLLW treatability group is denoted as subgroup 0 of that treatability group (e.g., the original volume of STP treatability group LA-W906 became LA-W906-0). Each revision that has since added volumes to individual treatability groups has resulted in creation of an additional subgroup, having the same number as the revision (e.g., LA-W906-4 was created in Revision 4.0, and LA-W906-5 was created in Revision 5.0).

In most Sections of this chapter, the subgroups of the treatability groups are not shown. In those cases, the Activities and Compliance Dates are applicable to the entire net volume of that treatability group. However, when subgroups of a treatability group have been assigned Activities and Compliance Dates unique to that subgroup, those subgroups are detailed in the text. For a complete listing of volumes by subgroup for all treatability groups, please refer to Appendix B.

3.1 Mixed Waste Streams.

The following subsections summarize MLLW treatability groups.

3.1.1 IPA Wastes and Scintillation Fluids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
IPA wastes	LA-W901	D001, D009, F002, F003, F005	0	0.00
scintillation fluids	LA-W902	D001, F003, F005	0	0.00
Totals			**0**	**0.00**

Treatment:

The waste will be treated at an off-site facility that combusts organic liquid waste. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

	Activity	Compliance Dates
A.	Complete shipping waste	12/30/96*
B.	Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

*This activity date refers to the applicable waste in the original treatabilility group. Please note that one of the items in the original Treatability Group LA-W901 was transferred to Treatability Group LA-W906, in Revision 5.0, approved 12/29/97 by NMED.

3.1.2 Lead Blankets, Soil with Heavy Metals, ER Soils.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (M^3)
lead blankets	LA-W903	D007, D008	0	0.00
soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	3	0.45
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	0	0.00
Totals			**3**	**0.45**

Treatment:

The waste will be treated at an off-site facility that stabilizes or macroencapsulates wastes. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event

within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

	Activity	Compliance Dates
A.	Complete shipping waste or complete parallel option	12/30/98
B.	.Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.3 Aqueous Organic Liquids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
aqueous organic liquids	LA-W906-0 LA-W906-4 LA-W906-5	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	173	10.32
Totals			**173**	**10.32**

Note: See below for additional wastes in this treatability group

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site treatment facility (commercial or non-commercial) and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	02/09/00
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes.

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
aqueous organic liquids	LA-W906-6	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	88	5.74
Totals			**88**	**5.74**

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Dates
C. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	02/09/03
D. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.4 Organic-Contaminated Combustible Solids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
organic-contaminated combustible solids	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	382	36.07
Totals			**382**	**36.07**

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D018, D019, D020, D022, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D042, D043, F001, F002, F003, F004, F005	231	27.31
Totals			**231**	**27.31**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off- site treatment facility or complete parallel option	02/14/02
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.5 Combustible Debris, Activated or Inseparable Lead, Noncombustible Debris.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
combustible debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	105	15.17
Totals			**105**	**15.17**

Treatability group		RCRA codes	Number of items	Net volume (m^3)
activated or inseparable lead	LA-W921	D008	35	7.30
noncombustible debris	LA-W922	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	191	36.46
Totals			**226**	**43.76**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	08/25/00
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.6 Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
aqueous wastes with heavy metals	LA-W913	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011	139	3.07
corrosive solutions	LA-W914	D001, D002	197	1.21
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	23	0.17
Totals			**359**	**4.45**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	05/08/01
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.7 Water-Reactive Metals.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
water-reactive wastes	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	113	7.05
Totals			**113**	**7.05**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	04/21/04
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.8 Compressed Gases Requiring Scrubbing.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	25	0.63
Totals			**25**	**0.63**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

	Activity	Compliance Dates
A.	Complete shipping of existing wastes to an off- site treatment facility or complete parallel option	08/28/03
B.	Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.9 Compressed Gases Requiring Oxidation.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
compressed gases requiring oxidation	LA-W918	D001, U226	192	1.78
Totals			**192**	**1.78**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing

as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	08/28/03
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.10 Elemental Mercury.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
elemental mercury	LA-W920	D006, D009, F005	79	0.66
Totals			**79**	**0.66**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat

waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager

shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	11/15/00
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.11 Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components, Liquid and Solid Oxidizers.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
halogenated organic liquids	LA-W907	D001, D002, D003, D007, D009, D010, D011, D018, D019, D022, D028, D029, D035, D043, F001, F002, F003, F004, F005, U077, U080, U226, U227, U228, U236	537	18.30
nonhalogenated organic liquids	LA-W908	D001, D002, D003, D004, D007, D008, D009, D011, D018, D038, D040, F002, F003, F004, F005, U002, U019, U154, U169, U188, U220, U246	899	20.22
bulk oils	LA-W909	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	45	5.81
PCB wastes with RCRA components	LA-W910	D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D019, D027, D028, D030, D031, D032, D033, D034, D036, D039, D042, D043, F002, F003, F004, F005	40	2.75
Totals			**1453**	**47.02**

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
Liquid and solid oxidizers	LA-W923	D001, D003, D005	93	1.37
Totals			**93**	**1.37**

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Off-site shipments must be completed by February 2002.

Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14)

working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

	Activity	Compliance Dates
A.	Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	02/01/02
B.	Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.2 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m^3)
lead wastes - TBD	LA-W924	D003, D008	129	40.16
mercury wastes - TBD	LA-W925-0	D007, D008, D009, F001	63	18.30
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	10	1.25
biochemical laboratory wastes	LA-W927	D001, D003	9	1.34
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	61	12.71
Totals			**272**	**73.76**

Note: See below for additional wastes in some of these treatability groups

Treatment:

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

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

Activities for wastes originally belonging to these treatability groups as listed above.

Activity	Compliance Dates
A. Complete generator interviews	10/30/95
B. Complete sampling and analysis plan	1/30/96
C. Complete sampling and analysis	9/30/98
D. Complete determination of treatment options	12/20/98
E. Complete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/00
F. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes and treatability groups:

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA Codes	Number of items	Net volume (m3)
mercury wastes-TBD	LA-W925-4 LA-W925-5 LA-W925-6	D003, D007, D008, D009, F001, F002, F005	74	2.61
explosives	LA-W932	D003	1	0.000001
labpacks	LA-W933	D001, D002, D003, D004, D005, D006, D007, D008, D010, F003, F005, D011, P012, P029, P098, P106, P113, P120, U131, U144, U145, U188, U190, U204, U216, U219	153	0.30
Totals			**228**	**2.91**

Activities for wastes belonging to these treatability groups and subgroups.

Activity	Compliance Dates
G. Complete sampling and analysis plan	1/30/99
H. Complete sampling and analysis	9/30/01
I. Complete determination of treatment options	12/20/01
J. Complete shipping of wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/03
K. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at off-site facility or within 45 days after completion of parallel option

3.3 Plans for Other Types of Activities.

The following subsection summarizes plans for other types of activities.

3.3.1 Lead Decontamination

Treatability Group(s):

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m^3)	No. Items	Net volume (m^3)	No. Items	Net volume (m^3)
lead for surface contamination	LA-W930-0 LA-W930-5	0	0.00	134	49.19	133	49.08
Totals		**0**	**0.00**	**134**	**49.19**	**133**	**49.08**

Note: See below for additional wastes in this treatability group

Treatment:

This treatability group contains two categories of lead for decontamination:

- The first category is lead in the original LA-W930-0 inventory that is amenable to decontamination in the on-site lead decontamination trailer, which was designed to decontaminate simple lead shapes, such as lead bricks, of certain physical dimensions. The trailer is on-site and has operated, but needs an upgrade for prolonged operation.

- The lead in the second category is lead in the original LA-W930-0 inventory that is not amenable to decontamination in the on-site lead decontamination trailer, plus subsequent additions to the original inventory shown in Appendix B. This lead will be processed using other on-site decontamination processes, such as dry sandblasting or hand-scrubbing, or sent to off-site lead decontamination services.

Any lead not acceptable for on-site or off-site lead decontamination, plus any lead unsuccessfully decontaminated, will be designated for treatment and disposal at an off-site facility, or for recycle through an off-site capability, such as metal melting to create shielding

blocks or a DOE lead bank. Non-conforming items will be reassigned to appropriate treatability groups in accordance with the FFCO.

Should DOE decide to treat or recycle waste at an off-site non-commercial facility in lieu of plans to treat or recycle such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment/recycle option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment/ recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment/recycling site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Lead shapes and forms in the first category.

Activity	Compliance Date
A. Complete lead decontamination	09/30/97

Lead shapes and forms in the second category.

Activity	Compliance Date
A. Provide schedule for development of lead processing techniques and options	06/30/96
B. Segregate lead waste into decontamination groupings	07/31/97
C. Complete shipment of wastes to decontamination operations, or	12/02/98

D. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/98
E. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/99
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

The following additional wastes will require management in the second category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	First category		Second category		Total	
		No. Items	Net volume (m^3)	No. Items	Net volume (m^3)	No. Items	Net volume (m^3)
lead for surface contamination	LA-W930-6	0	0.00	14	12.06	14	12.06
Totals		**0**	**0.00**	**14**	**12.06**	**14**	**12.06**

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Date
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/00
J. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.3.2 Sorting, Surveying, and Decontamination.

Treatability Group(s):

Treatability group	MWIR waste ID	Number of items	Net volume (m^3)
nonradioactive or suspect waste items to be surveyed	LA-W929-0(1)	0	0.0
nonradioactive or suspect waste items to receive RCRA and radiological characterization	LA-W929-0(2)	0	0.00
nonradioactive or suspect waste items that cannot or should not be sampled	LA-W929-0(3)	0	0.0
Totals		**0**	**0.00**

Note: See below for additional wastes in this treatability group

Treatment:

The waste items in part 1 of the original volume in this treatability group will be surveyed using a field operation that will survey waste suspect of radioactive contamination to determine whether it is radioactively contaminated. The work will be done on-site with equipment and staffing provided by LANL or another DOE site. Waste determined not to be radioactively contaminated will be treated using commercial facilities permitted to treat hazardous waste; waste determined to be radioactively contaminated will be assigned to applicable treatability groups and/or sent to offsite facilities for appropriate treatment.

Waste items in part 2 of this treatability group will be surveyed using complete RCRA and radiological sampling and characterization. Waste sampled under this alternative will be treated and disposed as low-level mixed waste; the waste will be assigned to applicable treatability groups and/or sent to off-site facilities for appropriate treatment based on the results of this characterization.

Sampling for this characterization alternative will be conducted in accordance with RCRA SW-846 methods. To ensure an adequate volume of waste material is available for sampling and to

maximize the cost effectiveness of the sampling activities, some lab packed and other waste items may be bulked into larger volume containers; all RCRA waste codes will be transferred to the bulked wastes to ensure correct RCRA categorization is maintained. It may be found, when preparing a given drum for sampling, (for example, solid small volume waste items that cannot be sampled in accordance with EPA SW-846 methods) are in fact not amenable to sampling and should have been included in the item count for group 3 . If visual inspection so indicates, these waste items will be transferred to Group 3 and assigned to applicable treatability groups based on existing knowledge.

Waste items in part 3 of this treatability group which are confirmed not amenable to sampling (e.g., lead-acid batteries, spray paint cans) will be assigned to applicable treatability groups based on existing knowledge. It may be found, when inspecting a given drum, that some items can in fact be sampled in accordance with EPA SW-846 methods and should have been included in the item count for Group 2. If visual inspection so indicates, these waste items will be transferred to Group 2 and sampled accordingly.

Additional compliance dates will be proposed for any waste items in this treatability group found not to have available treatment/disposal options following a complete review of all survey, analytical, or visual inspection data obtained through these processes.

For all waste items in this treatability group, shipment off-site for treatment is a parallel preferred option. Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within (45) working days of receipt of waste at the treatment facility.

Activities for waste items in part 1 of this treatability group.

Activity	Compliance Dates
A. Complete field survey	10/30/96
B. Submit documentation declaring waste items as nonradioactive, or submit documentation assigning waste items to applicable treatability groups	2/28/97
C. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 2 of this treatability group.

Activity	Compliance Dates
D. Complete RCRA and radiological sampling	1/28/97
E. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	2/28/97
F. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 3 of this treatability group.

Activity	Compliance Dates
G. Complete visual verification	1/28/97
H. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	6/30/97
I. Propose additional compliance dates if necessary	9/30/97

Additional wastes:

Treatability group	MWIR waste ID	Number of items	Net volume (m^3)
Nonradioactive or suspect waste items	LA-W929-5	0	0.00
Totals		**0**	**0.00**

Activities for items added as subgroup 5 of this treatability group.

Activity	Compliance Dates
J. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	3/31/98
K. Propose additional Compliance Dates if necessary	3/31/98

3.3.3 Lead Requiring Sorting.

Treatability Group(s):

Treatability Group	MWIR waste ID	RCRA Codes	Number of Items	Net Volume (m^3)
Lead requiring sorting	LA-W931	D008	12	1.08
Totals			**12**	**1.08**

Treatment:

Wastes in this treatability group are generally heterogeneous and will require different treatment processes. Drums will be opened, the contents removed, and the waste repackaged based on appropriate treatment requirements. Wastes in this treatability group are primarily lead pieces, lead shot, and lead-contaminated soils that have been packaged in the same drum.

The wastes will be reclassified to the applicable treatability group after physical separation and repackaging. The wastes will be treated by appropriate technology.

Activities for waste items in this treatability group.

Activity	Compliance Dates
A. Complete sorting	06/01/01
B. Submit documentation assigning waste items to applicable treatability groups. Propose additional compliance dates, if necessary, or	06/01/03
C. Complete shipment of existing waste to off-site facility for treatment, or complete parallel options.	06/01/03

3.4 Management of "Missing" Items.

Waste Category:

Category	MWIR waste ID	No. Items	Net volume (m^3)
Missing/nonexistent/TBV	None	48	8.81
Totals		**48**	**8.81**

Treatment:

During visual inspections and sampling activities in support of STP waste work-off, occasionally an item cannot be found, or it is not located in the containers in which it is expected to be, according to the LANL data files for the waste item. In some instances, such items could not be verified as having ever been received in storage at LANL, and further follow-up investigations of the record files revealed that for various reasons, the waste items were never in fact generated, although on paper they were included in the original STP inventory.

In these instances, DOE and UC, and their contractors, perform a thorough inspection of both the physical inventories and the data files. When DOE and UC determine that an STP covered waste item does not exist, transfer of the item to the category called *"Missing/ nonexistent/TBV (*to be verified*)"*, is requested through the revision process associated with the next *Annual Update.*

DOE and UC will re-verify the absence of all *"Missing/ nonexistent/TBV"* items container-by-container, as each STP waste item is being sampled, repackaged, or otherwise prepared for on- or off-site treatment. The final verification that all *"Missing/ nonexistent/TBV"* items do not in fact exist will be completed by April 21, 2004, at which time all remaining MLLW items in the original STP inventory will have been treated. At that time, DOE and UC will request deletion of all items having been fully verified as missing or nonexistent.

At any time during the re-verification process, should any of these items be discovered to exist, NMED will be notified, and approval will be requested for assignment of the rediscovered items to the appropriate TG. If necessary, they will be assigned new Activities and Compliance Dates, in accordance with the terms of the FFCO.

The following steps will be taken to verify presence or absence of this waste:

Activity	Compliance Dates
A. Initiate re-verification process on a shipment-by-shipment basis	01/03/98
B. Complete re-verification process	04/21/04
C. Re-assign any existing items to appropriate treatability groups	04/21/04
D. Complete treatment of existing wastes to applicable regulatory standards, or	10/30/04
E. Complete shipping of existing wastes to an off-site treatment facility	10/30/04
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

4.0 MIXED TRANSURANIC WASTE.

Treatment Group(s):

Assorted Mixed Transuranic Waste

Treatment Technology:

Respondents are required to develop treatment technologies and treat mixed transuranic (MTRU) waste at LANL according to the schedule set forth below:

Activity	Compliance Date
A. Development of treatment technologies	June 30, 1999
B. Submit permit application amendment or modification to NMED for treatment of MTRU	December 31, 1999
C. Begin treating MTRU	Six (6) months after NMED permit issuance
D. Complete treatment of existing MTRU to applicable regulatory standards	December 31, 2010

The above schedule is not based on the assumption that WIPP will be a disposal option or that DOE will receive a variance from treatment standards for land disposal of MTRU waste to be disposed at WIPP. All revisions to compliance dates shall be in accordance with the procedures set forth in the compliance order.

CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "*Revisions,*" and Section XI, "*Other Amendments to the STP,*" of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been seven revisions and two amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's STP *Annual Update,* and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	*12/29/97*	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	*12/29/97*	Added volumes reported in FY95 and FY96 *Annual Updates* (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	*(to be added)*	Added volumes reported in FY97 *Annual Update* to several treatability groups, added Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	*(to be added)*	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies, provided option for shipping covered waste, under special circumstances, prior to addition by approved revision.

CPV APPENDIX B.
SUMMARY OF CPV INVENTORY CHANGE.S

The following tables provide a comprehensive summary of changes to the CPV covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of this revision. The volumes given in the tables reflect changes to the individual MLLW treatability group volumes due to increases or decreases, as noted. Table B-1 reports the inventory changes arising from Revisiosn 6.0 and 7.0, while Table B-2 reports the inventory changes previously approved in Revision 4.0/5.0.

Key to Reading the Subgroups.

The original STP inventory in each MLLW treatability group is now denoted as subgroup -0 of that treatability group (e.g., the original volume of STP treatability group LA-W906 became LA-W906-0). The original October 4, 1995 STP inventory in each MLLW treatability group has been modified through the revision process in the FFCO. The following revisions have affected volumes in individual treatability groups to date:

Revision	Effect on Volumes
Rev. 2.0	Reduced volume of LA-W928
Rev. 3.0	Divided original volume of LA-W929 into three subgroups
Rev. 4.0	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added new treatability groups
Rev. 5.0	Increased and decreased volumes in several treatability groups
Rev. 6.0	Increased and decreased volumes in several treatability groups, transferred the volume in LA-W929-5 to another treatability group
Rev. 7.0	Adjusted volumes in several treatability groups

Each revision that has added volumes to individual treatability groups has resulted in creation of an additional subgroup of that treatability group, having the same number as the revision (e.g., LA-W906-4 was created in Revision 4.0, and LA-W906-5 was created in Revision 5.0).

Additions and Deletions to Date.

To date, MLLW inventory increases and decreases have been incorporated into the covered waste inventories through Revisions 2.0, 4.0, 5.0, 6.0, and 7.0. Revision 2.0 incorporated decreases in treatability group LA-W928 due to deletion of covered waste items. Rev. 4.0 resulted in decreases to LA-W929 and increases in other TGs, primarily by transferring LA-W929 items to other TGs. Rev. 5.0 and 6.0 resulted in both additions to and deletions of

covered waste volumes (i.e., increases and decreases) in a number of TGs. Therefore, the Appendix B tables that follow show that subgroups -4, -5, -6 and -7 exist for some treatability groups, but not for all.

These tables provide a master list of MLLW inventory changes presented in the *Annual Updates,* to enable users of the STP to track all changes in the LANL MLLW covered waste inventory that occurred since the original STP inventory was established in the October 4, 1995 FFCO/CPV.

Changes (additions or deletions) to the CPV covered waste inventory have occurred since the end of FY97. However, only those reported as of Rev. 6.0 and Rev. 7.0 are included in this table. All others will be reported in the next *Annual Update* and associated revision request. Therefore, the *"Net Covered Waste Inventory"* may not fully reflect the actual CPV covered waste inventory as of the date of this revision, in some instances.

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.1	IPA Wastes	LA-W901-0	7	0.02	Decrease 7	Decrease 0.02					0	0.00	0	0.00
3.1.1	Scintillation Fluids	LA-W902-0	1	0.0038	Decrease 1	Decrease 0.0038					0	0.00	0	0.00
3.1.2	Lead Blankets	LA-W903-0	0	0.00							0	0.00	0	0.00
3.1.2	Soil with Heavy Metals	LA-W904-0	58	10.43[a]	Decrease 6 Decrease 2 Decrease 46 Decrease 2	Decrease 0.62[b] Decrease 0.42[c] Decrease 8.91 Decrease 0.14					2	0.34		
		LA-W904-5	1	0.11							1	0.11	3	0.45
3.1.2	ER Soils	LA-W905-0	0	0.00							0	0.00	0	0.00

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.3	Aqueous Organic Liquids	LA-W906-0	45	1.65							45	1.65		
		LA-W906-4	27	0.36							27	0.36		
		LA-W906-5	101	8.31[d]							101	8.31		
		LA-W906-6	0	0.00	Increase 88	Increase 5.74					88	5.74	261	16.06
3.1.4	Organic-Combustible Solids	LA-W911-0	305	28.10	Increase 2	Increase 0.42[c]					307	28.52		
		LA-W911-4	33	0.68							33	0.68		
		LA-W911-5	40	6.87							40	6.87		
		LA-W911-6	0	0.00	Increase 1	Increase 0.0038					1	0.0038		
		LA-W911-7	0	0.00					Increase 1	Increase 0.001	1	0.001	382	36.07

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.4	Organic-Contaminated Noncombus-tible Solids	LA-W919-0	79	7.71	Increase 1	Increase 0.11[e]					80	7.82		
		LA-W919-4	9	0.38							9	0.38		
		LA-W919-5	89	10.53							89	10.53		
		LA-W919-6	0	0.00	Increase 49	Increase 8.58					49	8.58		
		LA-W919-7	0	0.00					Increase 4	Increase 0.002	4	0.002	231	27.31
3.1.5	Combustible Debris	LA-W912-0	83	13.82							83	13.82		
		LA-W912-4	9	0.75							9	0.75		
		LA-W912-5	5	0.28							5	0.28		
		LA-W912-6	0	0.00	Increase 6	Increase 0.32					6	0.32		
		LA-W912-7	0	0.00					Increase 2	Increase 0.0004	2	0.0004	105	15.17

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.5	Activated or Inseparable Lead	LA-W921-0	14	4.77	Decrease 1 Decrease 2	Decrease 0.06[f] Decrease 1.72			Increase 1	Increase 0.208	12	3.20		
		LA-W921-5	18	3.35	Decrease 4	Decrease 0.83[f]					14	2.52		
		LA-W921-6	0	0.00	Increase 9	Increase 1.58					9	1.58	35	7.30
3.15	Non-combustible Debris	LA-W922-0	41	5.62	Decrease 14	Decrease 2.915					27	2.71		
		LA-W922-4	53	2.83							53	2.83		
		LA-W922-5	63	22.29	Decrease 3	Decrease 0.62					60	21.67		
		LA-W922-6	0	0.00	Increase 51	Increase 9.25					51	9.25	191	36.46
3.1.6	Aqueous Wastes with Heavy Metals	LA-W913-0	83	1.50							83	1.50		
		LA-W913-4	25	0.40							25	0.40		
		LA-W913-5	11	0.15							11	0.15		
		LA-W913-6	0	0.00	Increase 20	Increase 1.02					20	1.02	139	3.07

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.6	Corrosive Solutions	LA-W914-0	60	0.69							60	0.69		
		LA-W914-4	90	0.36							90	0.36		
		LA-W914-5	39	0.12							39	0.12		
		LA-W914-6	0	0.00	Increase 8	Increase 0.04					8	0.04	197	1.21
3.1.6	Aqueous Cyanides, Nitrates, Chromates, and Arsenates	LA-W915-0	9	0.13							9	0.13		
		LA-W915-4	3	0.002							3	0.002		
		LA-W915-5	11	0.04							11	0.04	23	0.17
3.1.7	Water-Reactive Wastes	LA-W916-0	78	6.03							78	6.03		
		LA-W916-4	26	0.31							26	0.31		
		LA-W916-5	4	0.03							4	0.03		
		LA-W916-6	0	0.00	Increase 5	Increase 0.68					5	0.68	113	7.05
3.1.8	Compressed Gases Requiring Scrubbing	LA-W917-0	13	0.35							13	0.35		
		LA-W917-7	0	0.00					Increase 12	Increase 0.28	12	0.28	25	0.63

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.9	Compressed Gases Requiring Oxidation	LA-W918-0	6	0.08							6	0.08		
		LA-W918-4	168	1.23							168	1.23		
		LA-W918-5	2	0.01							2	0.01		
		LA-W918-6	0	0.00	Increase 1	Increase 0.0002					1	0.0002		
		LA-W918-7	0	0.00					Increase 15	Increase 0.46	15	0.46	192	1.78
3.1.10	Elemental Mercury	LA-W920-0	45	0.50							45	0.50		
		LA-W920-4	20	0.02							20	0.02		
		LA-W920-5	9	0.02							9	0.02		
		LA-W920-6	0	0.00	Increase 5	Increase 0.12					5	0.12	79	0.66

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.11	Halogenated Organic Liquids	LA-W907-0	384	16.58	Decrease 3	Decrease 0.0076					381	16.57		
		LA-W907-4	97	1.05							97	1.05		
		LA-W907-5	31	0.49							31	0.49		
		LA-W907-6	0	0.00	Increase 16	Increase 0.15					16	0.15		
		LA-W907-7	0	0.00					Increase 12	Increase 0.04	12	0.04	537	18.30
3.1.11	Nonhalogen-ated Organic Liquids	LA-W908-0	275	14.34	Increase 0[g] Decrease 4 Decrease 0[h]	Increase 0.076 Decrease 0.49 Decrease 0.11					271	13.82		
		LA-W908-4	409	3.38							409	3.38		
		LA-W908-5	130	2.91							130	2.91		
		LA-W908-6	0	0.00	Increase 33	Increase 0.09					33	0.09		
		LA-W908-7							Increase 56	Increase 0.02	56	0.02	899	20.22

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.11	Bulk Oils	LA-W909-0	28	3.75	Increase 0[i] Decrease 23	Increase 0.47 Decrease 2.22					5	2.00		
		LA-W909-4	8	1.48							8	1.48		
		LA-W909-5	28	2.28							28	2.28		
		LA-W909-6	0	0.00	Increase 4	Increase 0.05					4	0.05	45	5.81
3.1.11	PCB Wastes with RCRA Components	LA-W910-0	4	0.74	Increase 6	Increase 0.62[b]					10	1.36		
		LA-W910-6	0	0.00	Increase 30	Increase 1.39					30	1.39	40	2.75
3.1.11	Liquid and Solid Oxidizers	LA-W923-0	6	0.117							6	0.117		
		LA-W923-4	67	0.145							67	0.145		
		LA-W923-5	13	0.317							13	0.317		
		LA-W923-6	0	0.00	Increase 7	Increase 0.795					7	0.795	93	1.37
3.2	Lead Waste - TBD	LA-W924-0	129	40.16							129	40.16	129	40.16

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.2	Mercury Wastes - TBD	LA-W925-0	63	18.30							63	18.30		
		LA-W925-4	37	0.42							37	0.42		
		LA-W925-5	14	1.52							14	1.52		
		LA-W925-6	0	0.00	Increase 23	Increase 0.67					23	0.67	137	20.91
3.2	Compressed Gases - TBD	LA-W926-0	10	1.25							10	1.25	10	1.25
3.2	Biochemical Laboratory Wastes	LA-W927-0	9	1.34							9	1.34	9	1.34
3.2	Dewatered Treatment Sludge	LA-W928-0	61	12.71							61	12.71	61	12.71
3.2	Explosives	LA-W932-0	0	0.00							0	0.00		
		LA-W932-4	1	0.000001							1	0.000001	1	0.000001

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.2	Lab Packs	LA-W933-0	0	0.00							0	0.00		
		LA-W933-4	114	0.17							114	0.17		
		LA-W933-5	28	0.13							28	0.13		
		LA-W933-6	0	0.00	Increase 6	Increase 0.003	Increase 1	Increase 0.00002[i]			7	0.003		
		LA-W933-7	0	0.00					Increase 4	Increase 0.002	4	0.002	153	0.30

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.3.1	Lead for Surface Decontamination	LA-W930-0	36	33.43	Decrease 1 Decrease 4 Decrease 6 Decrease 2	Decrease 0.11[k] Decrease 0.35[k] Decrease 1.04 Decrease 5.66			Increase 0[o] Decrease 1	Increase 0.095 Decrease 0.208	22	26.16		
		LA-W930-5	115	23.75	Decrease 1 Decrease 3	Decrease 0.21[k] Decrease 0.62[k]					111	22.92		
		LA-W930-6	0	0.00	Increase 14	Increase 12.06					14	12.06	147	61.14
3.3.2	Nonradioactive or Suspect Waste Items to be Surveyed	LA-W929-0	2	0.0076	Decrease 2	Decrease 0.0076					0	0.00		
		LA-W929-5	1	0.00002			Decrease 1	Decrease 0.00002[j]			0	0.00	0	0.00

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.3.3	Lead Requiring Sorting	LA-W931-0	23	4.76	Decrease 23 Increase 0[m]	Decrease 4.78 Increase 0.02					0	0.00		
		LA-W931-5	8	0.44							8	0.44		
		LA-W931-6	0	0.00	Increase 4	Increase 0.64					4	0.64	12	1.08
None[n]	IPA	None	0	0.00	Increase 1 Decrease 1	Increase 0.0005[n] Decrease 0.0005[n]					0	0.00	0	0.00

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Category	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 6 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.4	Missing/ nonexistent/ TBV	NONE (Revision 5)	48	8.81					0	Decrease 0.00095[p]	48	8.81	48	8.81

NOTES:

[a] This correction in LA-W904 volume arises from an error in the Appendix B in Revision 4/5 as discussed in Revision 6.0.

[b] This transfer of LA-W904 waste to LA-W910 was approved by NMED on September 18, 1997 as discussed in Revision 6.0

[c] This transfer of LA-W904 waste to LA-W911 was approved by NMED on September 18, 1997 as discussed in Revision 6.0

[d] This correction in LA-W906 volume arises from an error in the Appendix B in Revision 4/5 as discussed in Revision 6.0.

[e] The volume increase arises from the return of unused treatability study sample. It has been returned to the original inventory of LA-W919 (subgroup -0) consistent with the inventory subgroup from which the sample was removed.

[f] These 5 items in subgroups LA-W921-0 and -5 (0.89 m^3 total) were shipped on December 9, 1996 as discussed in DOE's letter dated December 24, 1996.

[g] This increase in LA-W908 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

[h] This decrease in LA-W908 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

[i] This correction in LA-W909 volume arises from an error in Appendix B in Revision 4/5 as discussed in Revision 6.0.

[j] This transfer of LA-W929 waste to LA-W933 is discussed in Revision 6.0.

[k] The shipment of 0.32 m^3, as reported in the FY97 STP *Annual Update*, consisted of 1 item (0.11 m^3) from subgroup LA-W930-0 and 1 item (0.21 m^3) from subgroup -5. The shipment of 0.97 m^3, as reported in the FY97 STP *Annual Update*, consisted of 4 items (0.35 m^3) from subgroup -0 and 3 items (0.62 m^3) from subgroup -5.

[m] This increase in LA-W931 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

[n] This item of isopropyl alcohol waste was not included in the original STP inventory and it was shipped for treatment as discussed in DOE's letter dated January 9, 1997.

[o] The increase in volume without increasing the number of items reults from an error in the original STP inventory data as discussed in Revision 7.0.

[p] Item found as discussed in Revision 7.0.

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.1	IPA Wastes	LA-W901-0	7	0.02	Decrease 7	Decrease 0.02					0	0.00	0	0.00
3.1.1	Scintillation Fluids	LA-W902-0	1	0.0038	Decrease 1	Decrease 0.0038					0	0.00	0	0.00
3.1.2	Lead Blankets	LA-W903-0	0	0.00							0	0.00	0	0.00
3.1.2	Soil with Heavy Metals	LA-W904-0	58	~~10.33~~ 10.43[a]	Decrease 6 Decrease 2 Decrease 46 Decrease 2	Decrease 0.62[b] Decrease 0.42[c] Decrease 8.91 Decrease 0.14					2	0.34		
		LA-W904-5	1	0.11							1	0.11	3	0.45
3.1.2	ER Soils	LA-W905-0	0	0.00							0	0.00	0	0.00

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.3	Aqueous Organic Liquids	LA-W906-0	45	1.65							45	1.65		
		LA-W906-4	27	0.36							27	0.36		
		LA-W906-5	101	~~8.88~~ 8.31[d]							101	8.31		
		LA-W906-6	0	0.00	Increase 88	Increase 5.74					88	5.74	261	16.06
3.1.4	Organic-Combustible Solids	LA-W911-0	305	28.10	Increase 2	Increase 0.42[c]					307	28.52		
		LA-W911-4	33	0.68							33	0.68		
		LA-W911-5	40	6.87							40	6.87		
		LA-W911-6	0	0.00	Increase 1	Increase 0.0038					1	0.0038		
		LA-W911-7	0	0.00					Increase 1	Increase 0.001	1	0.001	~~381~~ 382	36.07

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.4	Organic-Contaminated Noncombus-tible Solids	LA-W919-0	79	7.71	Increase 1	Increase 0.11[e]					80	7.82		
		LA-W919-4	9	0.38							9	0.38		
		LA-W919-5	89	10.53							89	10.53		
		LA-W919-6	0	0.00	Increase 49	Increase 8.58					49	8.58		
		LA-W919-7	0	0.00					Increase 4	Increase 0.002	4	0.002	~~227~~ 231	27.31
3.1.5	Combustible Debris	LA-W912-0	83	13.82							83	13.82		
		LA-W912-4	9	0.75							9	0.75		
		LA-W912-5	5	0.28							5	0.28		
		LA-W912-6	0	0.00	Increase 6	Increase 0.32					6	0.32		
		LA-W912-7	0	0.00					Increase 2	Increase 0.0004	2	0.0004	~~103~~ 105	15.17

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.5	Activated or Inseparable Lead	LA-W921-0	14	4.77	Decrease 1 Decrease 2	Decrease 0.06[f] Decrease 1.72			Increase 1	Increase 0.208	~~11~~ 12	~~2.99~~ 3.20		
		LA-W921-5	18	3.35	Decrease 4	Decrease 0.83[f]					14	2.52		
		LA-W921-6	0	0.00	Increase 9	Increase 1.58					9	1.58	~~34~~ 35	~~7.09~~ 7.30
3.15	Non-combustible Debris	LA-W922-0	41	5.62	Decrease 14	Decrease 2.915					27	2.71		
		LA-W922-4	53	2.83							53	2.83		
		LA-W922-5	63	22.29	Decrease 3	Decrease 0.62					60	21.67		
		LA-W922-6	0	0.00	Increase 51	Increase 9.25					51	9.25	191	36.46
3.1.6	Aqueous Wastes with Heavy Metals	LA-W913-0	83	1.50							83	1.50		
		LA-W913-4	25	0.40							25	0.40		
		LA-W913-5	11	0.15							11	0.15		
		LA-W913-6	0	0.00	Increase 20	Increase 1.02					20	1.02	139	3.07

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.6	Corrosive Solutions	LA-W914-0	60	0.69							60	0.69		
		LA-W914-4	90	0.36							90	0.36		
		LA-W914-5	39	0.12							39	0.12		
		LA-W914-6	0	0.00	Increase 8	Increase 0.04					8	0.04	197	1.21
3.1.6	Aqueous Cyanides, Nitrates, Chromates, and Arsenates	LA-W915-0	9	0.13							9	0.13		
		LA-W915-4	3	0.002							3	0.002		
		LA-W915-5	11	0.04							11	0.04	23	0.17
3.1.7	Water-Reactive Wastes	LA-W916-0	78	6.03							78	6.03		
		LA-W916-4	26	0.31							26	0.31		
		LA-W916-5	4	0.03							4	0.03		
		LA-W916-6	0	0.00	Increase 5	Increase 0.68					5	0.68	113	7.05
3.1.8	Compressed Gases Requiring Scrubbing	LA-W917-0	13	0.35							13	0.35		
		LA-W917-7	0	0.00					Increase 12	Increase 0.28	12	0.28	~~13~~ 25	~~0.35~~ 0.63

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.9	Compressed Gases Requiring Oxidation	LA-W918-0	6	0.08							6	0.08		
		LA-W918-4	168	1.23							168	1.23		
		LA-W918-5	2	0.01							2	0.01		
		LA-W918-6	0	0.00	Increase 1	Increase 0.0002					1	0.0002		
		LA-W918-7	0	0.00					Increase 15	Increase 0.46	15	0.46	~~177~~ 192	~~1.32~~ 1.78
3.1.10	Elemental Mercury	LA-W920-0	45	0.50							45	0.50		
		LA-W920-4	20	0.02							20	0.02		
		LA-W920-5	9	0.02							9	0.02		
		LA-W920-6	0	0.00	Increase 5	Increase 0.12					5	0.12	79	0.66

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~3.2.1~~ 3.1.11	Halogenated Organic Liquids	LA-W907-0	384	16.58	Decrease 3	Decrease 0.0076					381	16.57		
		LA-W907-4	97	1.05							97	1.05		
		LA-W907-5	31	0.49							31	0.49		
		LA-W907-6	0	0.00	Increase 16	Increase 0.15					16	0.15		
		LA-W907-7	0	0.00					Increase 12	Increase 0.04	12	0.04	~~525~~ 537	~~18.26~~ 18.30
~~3.2.1~~ 3.1.11	Nonhalogen-ated Organic Liquids	LA-W908-0	275	14.34	Increase 0^g Decrease 4 Decrease 0^h	Increase 0.076 Decrease 0.49 Decrease 0.11					271	13.82		
		LA-W908-4	409	3.38							409	3.38		
		LA-W908-5	130	2.91							130	2.91		
		LA-W908-6	0	0.00	Increase 33	Increase 0.09					33	0.09		
		LA-W908-7							Increase 56	Increase 0.02	56	0.02	~~843~~ 899	~~20.20~~ 20.22

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~3.2.1~~ 3.1.11	Bulk Oils	LA-W909-0	28	3.75	Increase 0[i] Decrease 23	Increase 0.47 Decrease 2.22					5	2.00		
		LA-W909-4	8	1.48							8	1.48		
		LA-W909-5	28	2.28							28	2.28		
		LA-W909-6	0	0.00	Increase 4	Increase 0.05					4	0.05	45	5.81
~~3.2.1~~ 3.1.11	PCB Wastes with RCRA Components	LA-W910-0	4	0.74	Increase 6	Increase 0.62[b]					10	1.36		
		LA-W910-6	0	0.00	Increase 30	Increase 1.39					30	1.39	40	2.75
~~3.2.1~~ 3.1.11	Liquid and Solid Oxidizers	LA-W923-0	6	0.117							6	0.117		
		LA-W923-4	67	0.145							67	0.145		
		LA-W923-5	13	0.317							13	0.317		
		LA-W923-6	0	0.00	Increase 7	Increase 0.795					7	0.795	93	1.37
~~3.3~~ 3.2	Lead Waste - TBD	LA-W924-0	129	40.16							129	40.16	129	40.16

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~3.3~~ 3.2	Mercury Wastes - TBD	LA-W925-0	63	18.30							63	18.30		
		LA-W925-4	37	0.42							37	0.42		
		LA-W925-5	14	1.52							14	1.52		
		LA-W925-6	0	0.00	Increase 23	Increase 0.67					23	0.67	137	20.91
~~3.3~~ 3.2	Compressed Gases - TBD	LA-W926-0	10	1.25							10	1.25	10	1.25
~~3.3~~ 3.2	Biochemical Laboratory Wastes	LA-W927-0	9	1.34							9	1.34	9	1.34
~~3.3~~ 3.2	Dewatered Treatment Sludge	LA-W928-0	61	12.71							61	12.71	61	12.71
~~3.3~~ 3.2	Explosives	LA-W932-0	0	0.00							0	0.00		
		LA-W932-4	1	0.000001							1	0.000001	1	0.000001

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~3.3~~ 3.2	Lab Packs	LA-W933-0	0	0.00							0	0.00		
		LA-W933-4	114	0.17							114	0.17		
		LA-W933-5	28	0.13							28	0.13		
		LA-W933-6	0	0.00	Increase 6	Increase 0.003	Increase 1	Increase 0.00002[j]			7	0.003		
		LA-W933-7	0	0.00					Increase 4	Increase 0.002	4	0.002	~~149~~ 153	0.30

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~3.4.1~~ 3.3.1	Lead for Surface Decontamination	LA-W930-0	36	33.43	Decrease 1 Decrease 4 Decrease 6 Decrease 2	Decrease 0.11[k] Decrease 0.35[k] Decrease 1.04 Decrease 5.66			Increase 0[o] Decrease 1	Increase 0.095 Decrease 0.208	~~23~~ 22	~~26.27~~ 26.16		
		LA-W930-5	115	23.75	Decrease 1 Decrease 3	Decrease 0.21[k] Decrease 0.62[k]					111	22.92		
		LA-W930-6	0	0.00	Increase 14	Increase 12.06					14	12.06		
													~~148~~ 147	~~61.25~~ 61.14
~~3.4.2~~ 3.3.2	Nonradioactive or Suspect Waste Items to be Surveyed	LA-W929-0	2	0.0076	Decrease 2	Decrease 0.0076					0	0.00		
		LA-W929-5	1	0.00002			Decrease 1	Decrease 0.00002[j]			0	0.00		
													0	0.00

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~None~~[l] 3.3.3	Lead Requiring Sorting	LA-W931-0	23	4.76	Decrease 23 Increase 0[m]	Decrease 4.78 Increase 0.02					0	0.00		
		LA-W931-5	8	0.44							8	0.44		
		LA-W931-6	0	0.00	Increase 4	Increase 0.64					4	0.64	12	1.08
None[n]	IPA	None	0	0.00	Increase 1 Decrease 1	Increase 0.0005[n] Decrease 0.0005[n]					0	0.00	0	0.00

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Category	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 6 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
~~3.5~~ 3.4	Missing/ nonexistent/ TBV	NONE (Revision 5)	48	8.81					0	Decrease 0.00095[p]	48	8.81	48	8.81

NOTES:

[a] This correction in LA-W904 volume arises from an error in the Appendix B in Revision 4/5 as discussed in Revision 6.0.

[b] This transfer of LA-W904 waste to LA-W910 was approved by NMED on September 18, 1997 as discussed in Revision 6.0

[c] This transfer of LA-W904 waste to LA-W911 was approved by NMED on September 18, 1997 as discussed in Revision 6.0

[d] This correction in LA-W906 volume arises from an error in the Appendix B in Revision 4/5 as discussed in Revision 6.0.

[e] The volume increase arises from the return of unused treatability study sample. It has been returned to the original inventory of LA-W919 (subgroup -0) consistent with the inventory subgroup from which the sample was removed.

[f] These 5 items in subgroups LA-W921-0 and -5 (0.89 m^3 total) were shipped on December 9, 1996 as discussed in DOE's letter dated December 24, 1996.

[g] This increase in LA-W908 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

[h] This decrease in LA-W908 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

[i] This correction in LA-W909 volume arises from an error in Appendix B in Revision 4/5 as discussed in Revision 6.0.

[j] This transfer of LA-W929 waste to LA-W933 is discussed in Revision 6.0.

[k] The shipment of 0.32 m^3, as reported in the FY97 STP *Annual Update*, consisted of 1 item (0.11 m^3) from subgroup LA-W930-0 and 1 item (0.21 m^3) from subgroup -5. The shipment of 0.97 m^3, as reported in the FY97 STP *Annual Update*, consisted of 4 items (0.35 m^3) from subgroup -0 and 3 items (0.62 m^3) from subgroup -5.

[l] ~~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 *Background Volume*.~~

[m] This increase in LA-W931 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

[n] This item of isopropyl alcohol waste was not included in the original STP inventory and it was shipped for treatment as discussed in DOE's letter dated January 9, 1997.

[o] The increase in volume without increasing the number of items reults from an error in the original STP inventory data as discussed in Revision 7.0.

[p] Item found as discussed in Revision 7.0.

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.1	IPA Wastes	LA-W901-0	104	15.89							Decrease 96	Decrease 15.87	Decrease 1	Decrease 0.0005[b]	7	0.02		
		LA-W901-5									Increase 0 Decrease 0	Increase 4.11[c] Decrease 4.11			0	0.00	7	0.02
3.1.1	Scintillation Fluids	LA-W902-0	18	2.47					Decrease 15	Decrease 2.24	Decrease 2	Decrease 0.36			1	0.0038		
		LA-W902-5									Increase 0 Decrease 0	Increase 0.13[c] Decrease 0.13			0	0.00	1	0.0038
3.1.2	Lead Blankets	LA-W903-0	4	0.74							Decrease 4	Decrease 0.74			0	0.00	0	0.00
3.1.2	Soil with Heavy Metals	LA-W904-0	59	10.53									Decrease 1	Decrease ~~0.2082~~ 0.1047[4,i] *(see Rev 6.0 for correction)*	58	~~10.33~~ 10.43		
		LA-W904-5									Increase 1	Increase 0.11			1	0.11	59	10.54 ~~10.44~~

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.2	ER Soils	LA-W905-0	36	39.32							Decrease 36	Decrease 39.32			0	0.00	0	0.00
3.1.3	Aqueous Organic Liquids	LA-W906-0	45	1.65											45	1.65		
		LA-W906-4					Increase 27	Increase 0.36							27	0.36		
		LA-W906-5							Increase 3	Increase 0.43	Increase 73	Increase 3.62	Increase 1 Increase 24	Increase 0.0005[b] Increase ~~4.83~~ 4.26[c,1] *(see Rev 6.0 for correction)*	101	~~8.88~~ 8.31	173	10.32 ~~10.89~~
3.1.4	Organic-Contaminated Combustible Solids	LA-W911-0	307	28.32					Decrease 1	Decrease 0.11	Decrease 1	Decrease 0.11			305	28.10		
		LA-W911-4					Increase 33	Increase 0.68							33	0.68		
		LA-W911-5							Increase 2	Increase 0.17	Increase 31	Increase 5.24	Increase 7	Increase 1.46[c]	40	6.87	378	35.65

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.4	Organic-Contaminated Noncombustible Solids	LA-W919-0	80	7.82					Decrease 1	Decrease 0.11					79	7.71		
		LA-W919-4					Increase 9	Increase 0.38							9	0.38		
		LA-W919-5							Increase 9	Increase 0.001	Increase 74	Increase 9.58	Increase 6	Increase 0.95[c]	89	10.53	177	18.62
3.1.5	Combustible Debris	LA-W912-0	83	13.82											83	13.82		
		LA-W912-4					Increase 9	Increase 0.75							9	0.75		
		LA-W912-5									Increase 5	Increase 0.28			5	0.28	97	14.85
3.1.5	Activated or Inseparable Lead	LA-W921-0	74	15.60					Decrease 37	Decrease 7.42	Decrease 23	Decrease 3.41			14	4.77		
		LA-W21-5							Increase 51	Increase 10.11	Decrease 45 Increase 12	Decrease 9.05 Increase 2.29			18	3.35	32	8.12

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.5	Non-combustible Debris	LA-W922-0	41	5.62					~~Decrease 1~~	~~Decrease .0002~~[b]					41	5.62		
		LA-W922-4					Increase 53	Increase 2.83							53	2.83		
		LA-W922-5							Increase 21	Increase 1.25	Increase 42	Increase 21.04			63	22.29	157	30.74
3.1.6	Aqueous Wastes with Heavy Metals	LA-W913-0	203	1.85							Decrease 12 Decrease 108	Decrease 0.030 Decrease 0.32			83	1.50		
		LA-W913-4					Increase 25	Increase 0.40							25	0.40		
		LA-W913-5									Increase 11	Increase 0.15			11	0.15	119	2.05
3.1.6	Corrosive Solutions	LA-W914-0	162	1.36							Decrease 102	Decrease 0.67			60	0.69		
		LA-W914-4					Increase 90	Increase 0.36							90	0.36		
		LA-W914-5							Increase 13	Increase 0.04	Increase 26	Increase 0.08			39	0.12	189	1.17

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.1.6	Aqueous Cyanides, Nitrates, Chromates, and Arsenates	LA-W915-0	15	0.13					Decrease 1	Decrease 0.0003	Decrease 1 Decrease 4	Decrease 0.0002 Decrease 0.0031			9	0.13		
		LA-W915-4					Increase 3	Increase 0.002							3	0.002		
		LA-W915-5							Increase 4	Increase 0.02	Increase 7	Increase 0.02			11	0.04	23	0.17
3.1.7	Water-Reactive Wastes	LA-W916-0	78	6.03											78	6.03		
		LA-W916-4					Increase 26	Increase 0.31							26	0.31		
		LA-W916-5							Increase 1	Increase 0.02	Increase 3	Increase 0.01			4	0.03	108	6.37
3.1.8	Compressed Gases Requiring Scrubbing	LA-W917-0	13	0.35											13	0.35	13	0.35
3.1.9	Compressed Gases Requiring Oxidation	LA-W918-0	6	0.08											6	0.08		
		LA-W918-4					Increase 168	Increase 1.23							168	1.23		

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
		LA-W918-5									Increase 2	Increase 0.01			2	0.01	176	1.32
3.1.10	Elemental Mercury	LA-W920-0	45	0.50											45	0.50		
		LA-W920-4					Increase 20	Increase 0.02							20	0.02		
		LA-W920-5									Increase 9	Increase 0.02			9	0.02	74	0.54
3.2.1	Halogenated Organic Liquids	LA-W907-0	385	16.58							Decrease 1	Decrease 0.0025			384	16.58		
		LA-W907-4					Increase 97	Increase 1.05							97	1.05		
		LA-W907-5							Increase 13	Increase 0.04	Increase 18	Increase 0.45			31	0.49	512	18.12
3.2.1	Nonhalogenated Organic Liquids	LA-W908-0	275	14.34											275	14.34		
		LA-W908-4					Increase 409	Increase 3.38							409	3.38		
		LA-W908-5							Increase 53	Increase 0.08	Increase 77	Increase 2.83			130	2.91	814	20.63

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.2.1	Bulk Oils	LA-W909-0	28	3.75											28	3.75		
		LA-W909-4					Increase 8	Increase 1.48							8	1.48		
		LA-W909-5									Increase 28	Increase 2.28			28	2.28	64	7.51
3.2.1	PCB Wastes with RCRA Components	LA-W910-0	4	0.74											4	0.74	4	0.74
3.2.1	Liquid and Solid Oxidizers	LA-W923-0	55	0.20							Decrease 49	Decrease 0.0834			6	0.117		
		LA-W923-4					Increase 67	Increase 0.145							67	0.145		
		LA-W923-5							Increase 24	Increase 0.32	Decrease 11	Decrease 0.0034			13	0.317	86	0.58
3.3	Lead Waste - TBD	LA-W924-0	186	51.44					Decrease 57	Decrease 11.28					129	40.16	129	40.16

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.3	Mercury Wastes - TBD	LA-W925-0	63	18.30											63	18.30		
		LA-W925-4					Increase 37	Increase 0.42							37	0.42		
		LA-W925-5									Increase 14	Increase 1.52			14	1.52	114	20.24
3.3	Compressed Gases - TBD	LA-W926-0	10	1.25											10	1.25	10	1.25
3.3	Biochemical Laboratory Wastes	LA-W927-0	9	1.34											9	1.34	9	1.34
3.3	Dewatered Treatment Sludge	LA-W928-0	1288	268.17	Decrease 1227	Decrease 255.46									61	12.71	61	12.71
3.4.1	Lead for Surface Decontamination	LA-W930-0	125	56.20					Decrease 83	Decrease 14.43[f]			Decrease 6	Decrease 8.34[d]	36	33.43		
		LA-W930-5							Increase 109	Increase 22.50	Increase 6	Increase 1.25			115	23.75	151	57.18

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.4.2	Nonradioactive or Suspect Waste Items to be Surveyed	LA-W929-0	1250	14.24			Decrease 1196 Decrease 41	Decrease 13.97 Decrease 0.26[d]	~~Decrease 4~~	~~Decrease 0.002~~[b]	Decrease 2 Decrease 9	Decrease 0.00094 Decrease 0.0029			2	0.0076[c]		
		LA-W929-5							Increase 1	Increase .00002					1	0.00002	3	0.0076[c]
None	Lead Requiring Sorting	LA-W931-0	48	9.97					Decrease 22	Decrease 4.58	Decrease 3	Decrease 0.63			23	4.76		
		LA-W931-5							Increase 28	Increase 5.73	Decrease 28 Increase 8	Decrease 5.73 Increase 0.44			8	0.44	31	5.20

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Treatability Group	MWIR ID (by subgroup)	October 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.3	Explosives	LA-W932-0	0	0.00											0	0.00		
		LA-W932-4					Increase 1	Increase 0.000001							1	0.000001	1	0.000001
3.3	Lab Packs	LA-W933-0	0	0.00											0	0.00		
		LA-W933-4					Increase 114	Increase 0.17							114	0.17		
		LA-W933-5									Increase 28	Increase 0.13			28	0.13	142	0.30

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

CPV Section	Category	MWIR ID (by substream)	October, 1995 CPV Inventory		Revision 2 Inventory Changes		Revision 4 Inventory Changes		Revision 5 (3/96 FY95 Update Changes)		Revision 5 (3/97 FY96 Update Changes)		Revision 5 (Other Changes)		Subtotal (by substream)		Net Covered Waste Inventory[a] (including Rev. 4/5 changes)	
			Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)	Items	Volume (m^3)
3.5	Missing/ non-existent/ TBV	NONE											Increase 1 Increase 41 Increase 6	Increase 0.2082[d] Increase 0.26[d] Increase 8.34[d]			48	8.81

TABLE B-2. SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH REV. 4/5)

NOTES:

[a] Changes (additions or deletions) to the CPV covered waste inventory have occurred since the end of FY96; however, only those reported as Rev. 5.0 "*Other Changes*" are included in this table. All others will be reported in the March, 1998 FY97 *Annual Update* and associated revision request. Therefore, the *"Net Covered Waste Inventory"* may not fully reflect the ACTUAL CPV covered waste inventory as of the date of this revision, in some instances.

[b] As reported in DOE's January 31, 1997 letter, the volume associated with the 104th LA-W901-0 item (0.0005 m^3) was repackaged, and bulked with other LA-W906 wastes in 1991, prior to issuance of the original STP. Since this "*missing*" item has now been located, its volume is being formally transferred to LA-W906 and will be managed as such.

[c] The 4.11 m^3 volume shown for LA-W901, and the 0.13m^3 volume shown for LA-W902 are corrections, to reflect the actual volumes shipped in FY96. As reported in the March, 1997 FY96 *Annual Update*, the volume changes for LA-W901 and LA-W902 in FY96 were 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 actual volumes of these wastes when 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 DOE's January 31, 1997 letter.

[d] These items from LA-W904, LA-W929, and LA-W930 have been determined to be missing or nonexistent. They are being transferred to the category *"Missing/Nonexistent/TBV"* until their presence or absence are fully and finally verified.

[e] Although a number of changes (additions or deletions) to the CPV covered waste inventory have occurred since the end of FY96, only those reported here as Rev. 5.0 "*Other Changes*" are included in this table. These represent additional waste items that became covered waste after the end of FY96, for which opportunities exist for treatment during FY98. All other covered waste inventory changes since the end of FY96 will be reported in the March, 1998 FY97 *Annual Update.*

[f] This represents a correction to the March, 1996 FY95 *Annual Update* for LA-W930, which had reported that 84 items (14.64 m^3) had been removed from inventory. This was incorrect because one drum that had been returned to storage without the database being updated to reflect it was in storage instead of decontaminated.

[g] Two items in the original STP inventory for LA-W929, *Sort, Survey, and Decontamination*, were shipped to DSSI for treatment on December 18, 1996. This change in the covered waste volume will be reflected in the March,1998 FY97 *Annual Update,* and will be deleted from the CPV inventory in the associated revision. Therefore, these two items were reported as treated in the various submittals associated with Revision 4 of the STP, but were reported in the March, 1997 FY96 *Annual Update* (and are shown here) as having been in inventory as of September 30, 1996.

[h] This represents a correction to the March, 1996 FY95 *Annual Update*. It was reported that one LA-W922 item (0.0002 m^3) and 4 LA-W929 items (0.002 m^3) had been removed from inventory. This was incorrect because these items had been repacked into different containers, and are still in inventory.

[i] For LA-W906, Rev. 5.0 (Other Changes), the correct volume associated with this increase is 4.26 m^3 for LA-W904, Rev. 5.0 (Other Changes), the correct decrease is 0.105 m^3. Both of these corrrections are discussed and implemented in Rev 6.0.