



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



AUG 25 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Tymkowych
 FFCO Project Manager
 Hazardous and Radioactive Materials Bureau
 New Mexico Environment Department
 2044 Galisteo St., Building A
 P. O. Box 26110
 Santa Fe, NM 87505

Dear Mr. Tymkowych:

Subject: Expedited Treatment Opportunity, Site Treatment Plan (STP), Los Alamos National Laboratory (LANL), Federal Facility Compliance Order (FFCO), October 4, 1995

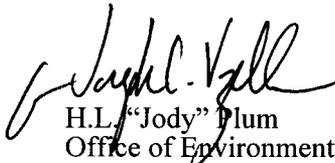
Per a discussion between you and Jim Seubert on August 17, 1999, the Department of Energy (DOE) and the University of California (UC) are requesting permission to ship five items of STP covered waste that are pending approval for addition to the STP in Revision 9. These items are part of the 30 items proposed for addition to the treatability group, "Non-combustible Debris," MWIR Waste ID LA-W922. An expedited treatment opportunity is available for this waste if it can be included for treatment and disposal with additional items already included under this treatability group in a waste profile submitted to the Waste Control Specialists of Texas (WCS) facility located near Andrews, Texas.

DOE and UC are proposing to include the five items, with a total volume of 2.753 cubic meters, in a planned off-site shipment scheduled in September 1999. Savings would be realized in analytical costs and transportation costs. Our alternative is to continue to store the waste for separate shipment, pending formal addition in Revision 9.0.

DOE and UC are requesting the New Mexico Environment Department's approval to include the proposed items in the September shipment. Enclosed are copies of the waste profile for the planned shipment with WCS and a detailed description of the five items (shown in bold). Also enclosed is a Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements," of the FFCO.

Please contact me at (505) 665-5042 or Beverly Martin at (505) 665-0714 if you have any questions.

Sincerely,


 H.L. "Jody" Plum
 Office of Environment

LAAME:6JP-152

Enclosures



1964

Red LANL FFCO/ep

TZ

John Tymkowych

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AUG 25 1999

bcc w/enclosures:

H. Haynes, Office of Counsel, LAAO

J. Nunz, LAAME, LAAO

K. Hargis, E-WMOSR, LANL, MS-J591

B. Martin, E-WMOSR, LANL, MS-J591

J. Rochelle, LC-GL, LANL, MS-A187

S. Moreno, LC-GL, LANL, MS-A187

J. Kelly, F-SWO, LANL, MS-J595

C. Duy, F-SWO, LANL, MS-J595

A. Jackson, ESH-19, LANL, MS-K490

J. Grimm, WMD, AL

**ENCLOSURE A
CERTIFICATION**

**EXPEDITED TREATMENT OPPORTUNITY, SITE TREATMENT PLAN (STP),
LOS ALAMOS NATIONAL LABORATORY (LANL)**

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.

Beverly Martin

Beverly Martin
Project Leader
Waste Management Program
Environmental Management Programs
Los Alamos National Laboratory
Operator

Aug 19, 1999

Date Signed

H. L. Plum

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

8/25/99

Date Signed

ITEM ID	CONTR. ID	DESCRIPTION	STP VOL (m3)	STP CD ("Rev 9")	STATUS Profile approved. Ship 9/15
2033870	C95051382	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033871	C95051383	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033872	C95051384	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033873	C95051385	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033874	C95051386	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033875	C95051387	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033876	C95051388	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033877	C95051389	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033878	C95051390	Residual Sampls (Soils)	0.2082	LA-W922	Inspected 8/17
2033879	C95051391	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033880	C95051392	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033881	C95051393	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033882	C95051394	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033883	C95051395	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033884	C95051396	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2033885	C95051397	Residual Samples (Soils)	0.2082	LA-W922	Inspected 8/17
2047033	C96064149	Returned Soil Samples	0.0076	LA-W922	Inspected 8/17
2018071	C96068286	Dry Sludge / Soil	0.1136	LA-W922	Inspected 8/17
2064606	C97080069	Returned Soil Samples	0.0076	"LA-W922" Rev 9	Inspected 8/17
2028592	C97094400	Returned Samples	0.0189	"LA-W922" Rev 9	Inspected 8/17
2062986	C97095049	Soil Samples	0.0038	"LA-W922" Rev 9	Inspected 8/17
2062987	C97095051	Soil Samples	0.0038	"LA-W922" Rev 9	Inspected 8/17
2026445	C97095099	B-25 Container With Soil	2.7187	"LA-W922" Rev 9	Inspected 8/17
TOTAL	23 Containers		6.2047		

Sales Representative

Exhibit "B"

Profile Number- 6558

Mailing Address:
1710 W. Broadway
Andrews, TX 79714



Waste Control Specialists L.L.C.

FedEx/UPS Address:
9998 W Hwy 176
Eunice, NM 88231

WCS EPA ID # TXD988088464
WCS State ID # 50358
WCS TDH License # L04971

Corporate Office/Sales: Phone # (888) 492-7552
Fax # (972) 944-5252

Site: Phone # (888) 789-2783
Fax # (505) 394-3427

Expected Treatment and Disposal Technology		Reporting Codes
<input type="checkbox"/> Direct Landfill	<input type="checkbox"/> Lab Pack Processing	_____ SIC Code
<input checked="" type="checkbox"/> Stabilization/Landfill	<input type="checkbox"/> PCB Processing	_____ Source Code
<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Storage	_____ Origin Code
<input type="checkbox"/> Incineration	<input type="checkbox"/> Other, specify	_____ System Type
List unacceptable treatment types: _____		

Section 1: Generator Information

Company Name LANL US EPA ID # NM 0890010515
 Address P.O. BOX 1663 State ID # _____
 City, State, Zip LOS ALAMOS, NM 87545
 Contact Name CHRIS DUY Phone # 505 667 5854
 Title WASTE STREAM MANAGER Fax # 505 665 8347
 24 Hour 505 667 6211
 Certificate of Disposal Yes No Technical Contact CHRIS DUY
 Status: Industrial CESQG Municipal Oilfield Oilfield Non-Exempt

Section 2: Billing Information (Same as above)

Company Name _____ Contact _____
 Address _____ Phone # _____
 City, State, Zip _____ Fax # _____

Section 3: General Description of the Waste

Waste Name MIXED LOWLEVEL SOILS AND SAMPLING DEBRIS
 Physical Description Liquid Single-phase Sludge Powder
 Solid Multi-phase Filter Cake Combination
 Detailed Description of Process Generating Waste RESIDUAL SOIL AND DEBRIS FROM ENVIRONMENTAL SAMPLING AND CONSTRUCTION
 Container Type and Size: 1 B25 Frequency: ONCE per _____
22 DRUMS
 Total Waste Quantity or rate of Generation APPROXIMATELY 6.2 CUBIC METERS
 Is this waste TSCA regulated? Yes No Wastewater Non-wastewater
 TX Waste Code # _____

Section 4: Regulatory Information

Profile Number

Proper US DOT Shipping Name (WASTE REACTIVE MATERIAL LSA, N.O.S.)
HAZARDOUS WASTE SOLID, N.O.S.

Class 9 UN NA 3077 PG III RQ NO Poison Inhalation Hazard? Y N

Waste Classification: Hazardous Non-Hazardous (Skip to Section 5)

List all applicable EPA Waste Code numbers D004 THROUGH D011

part of
 Is this waste a debris, subject to the alternate treatment standards listed in 40 CFR 268.45? Y N

Will this waste be treated to achieve a treatment standard before it is received at WCS? Y N

If yes, please explain _____

Is this waste subject to the national emissions standards for benzene waste operations as per 40 CFR 61.330? Y N

List all Underlying Hazardous Constituents* Check if not applicable) D004 THROUGH D011

*For characteristic Wastes, it must be determined if underlying hazardous constituents are present.

TCLP CERTIFICATION (mg/L, TCLP)

Check if not applicable)

CODE	COMPONENT	REGULATORY LIMIT	Check If \geq Limit	CODE	COMPONENT	REGULATORY LIMIT	Check If \geq Limit
D004	arsenic	5.0	<input checked="" type="checkbox"/>	D024	m-cresol	200.0	<input type="checkbox"/>
D005	barium	100.0	<input checked="" type="checkbox"/>	D025	p-cresol	200.0	<input type="checkbox"/>
D006	cadmium (except NiCads)	1.0	<input checked="" type="checkbox"/>	D026	mixed cresols	200.0	<input type="checkbox"/>
D007	chromium	5.0	<input checked="" type="checkbox"/>	D027	p-dichlorobenzene	7.5	<input type="checkbox"/>
D008	lead (except lead batteries)	5.0	<input checked="" type="checkbox"/>	D028	1,2-dichloroethane	0.5	<input type="checkbox"/>
D009	mercury (for low merc)	0.2	<input checked="" type="checkbox"/>	D029	1,1-dichloroethylene	0.7	<input type="checkbox"/>
D010	selenium	1.0	<input checked="" type="checkbox"/>	D030	2,4-dinitrotoluene	0.13	<input type="checkbox"/>
D011	silver	5.0	<input checked="" type="checkbox"/>	D031	heptachlor and epoxides	0.008	<input type="checkbox"/>
D012	endrin	0.02	<input type="checkbox"/>	D032	hexachlorobenzene	0.13	<input type="checkbox"/>
D013	lindane	0.4	<input type="checkbox"/>	D033	hexachlorobutadiene	0.5	<input type="checkbox"/>
D014	methoxychlor	10.0	<input type="checkbox"/>	D034	hexachloroethane	3.0	<input type="checkbox"/>
D015	toxaphene	0.5	<input type="checkbox"/>	D035	methyl ethyl ketone	200.0	<input type="checkbox"/>
D016	2,4-D	10.0	<input type="checkbox"/>	D036	nitrobenzene	2.0	<input type="checkbox"/>
D017	silvex (2,4,5-TP)	1.0	<input type="checkbox"/>	D037	pentachlorophenol	100.0	<input type="checkbox"/>
D018	benzene	0.5	<input type="checkbox"/>	D038	pyridine	5.0	<input type="checkbox"/>
D019	carbon tetrachloride	0.5	<input type="checkbox"/>	D039	tetrachloroethylene	0.7	<input type="checkbox"/>
D020	chlordane	0.03	<input type="checkbox"/>	D040	trichloroethylene	0.5	<input type="checkbox"/>
D021	chlorobenzene	100.0	<input type="checkbox"/>	D041	2,4,5-trichlorophenol	400.0	<input type="checkbox"/>
D022	chloroform	6.0	<input type="checkbox"/>	D042	2,4,6-trichlorophenol	2.0	<input type="checkbox"/>
D023	o-cresol	200.0	<input type="checkbox"/>	D043	vinyl chloride	0.2	<input type="checkbox"/>

COMPONENTS TABLE The waste consists of the following materials	Concentration Ranges are acceptable	Units
<u>DIRT / SOIL</u>	<u>95</u>	<u>%</u>
<u>SAMPLING BOTTLES, GLOVES, TRASH/DEBRIS</u>	<u>5</u>	<u>70</u>

Boiling Point NA degrees F Fuel value, BTU/lb NA Free Liquid % 0
 Flash Point NA degrees F Dry weight % _____ Asbestos % 0
 pH NA Density ~1.5 Unit g/cc

Describe the odor NONE

Reactive Sulfide Concentration NONE Reactive Cyanide Concentration NONE

- | | |
|---|--|
| Oxidizer as per 49 CFR <input type="checkbox"/> | Liquid Organic Peroxide <input type="checkbox"/> |
| *VOC's <input type="checkbox"/> | Infectious or Etiological <input type="checkbox"/> |
| Pyrophoric <input type="checkbox"/> | Putrescible <input type="checkbox"/> |
| Radioactive <input checked="" type="checkbox"/> | Autopolymerizable <input type="checkbox"/> |
| Explosive <input type="checkbox"/> | None of the above <input type="checkbox"/> |

*Please include specific VOC's, if any, in the components table above.

Section 6: Radioactive Characteristics **Mixed*** **Radioactive**
 (If neither Mixed nor Radioactive, go to Section 7)

*Basis for identifying as Mixed Waste (circle): (1) Ignitable (2) Reactive (3) Corrosive (4) EP Toxicity or TCLP (5) Listed Waste

Chemical Form OXIDES

Is material waste (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Is material exempt (check one): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (WAC section 3.2.1)
If Waste-What is Waste Class (check one): <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C or <input type="checkbox"/> >C (see Title 10 CFR 61.55 and TRCR 21, Appendix E)	
Is material NORM (check one): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Does Material contain technologically enhanced Radium (check one): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is material Source Material (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, Radon emanation rate is: _____ pCi/m ² /sec

Grams of Special Nuclear Material (Total for Profile) Pu <.001g U-233 0.0 U-235 0.35g

Section 6: Radioactive Characteristics Continued

Radioactive Constituents:

(List all radionuclides present in the waste, the concentration in pCi/gm and the total activity in milli Curies.)

[Attach additional sheets if necessary]

Radionuclide	Concentration pCi/gm	Total Activity in mCi	Radionuclide	Concentration pCi/gm	Total Activity in mCi
H3	0-10	<0.01	U234	0-97	<0.1
CS137	0-6	<0.01	U235	0-13	<0.1
AM241	0-3	<0.01	U238	0-11300	<0.1
TH230	0-3	<0.01			
TH232	0-3	<0.01			
Pu238	0-1	<0.01			
Pu239	0-60	<0.01			

ALL OTHER ISOTOPES: LESS THAN 1 pCi/g

Section 7: Safety Related Data

If the handling of this waste requires the use of special protective equipment, please explain _____

LOW LEVEL RADIOACTIVITY

Section 8: Attached Supporting Documents

Please list all documents, notes, or other data that are being attached to this form as part of the waste approval package. _____

CONTAINER WASTE DATA FORM SPREADSHEET

Section 9: Generator's Certification

The information contained herein is based on generator knowledge and/or analytical data. I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all materials described by this document.

Authorized Signature _____

Date 8/5/99

Title: _____

WSM

Printed Name: _____

CHRIS DUY

