

Los Alamos National Laboratory

Waste Management Program

Environmental Science and Waste Technology Division

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Date: August 28, 2000

Refer to: E/WM:00-017

HAND DELIVERED – AUGUST 28, 2000

Dr. Robert (Stu) Dinwiddie
RCRA Advisor
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Dr. Dinwiddie:

SUBJECT: SITE TREATMENT PLAN (STP), COMPLIANCE PLAN VOLUME (CPV), PROPOSED REVISION 10.0, LOS ALAMOS NATIONAL LABORATORY (LANL) FEDERAL FACILITY COMPLIANCE ORDER (FFCO), OCTOBER 4, 1995

The purpose of this letter is to request Revision 10.0 to the STP Compliance Plan Volume (CPV). The revision request has been prepared in accordance with the requirements of Section X.C.2, "Revisions," of the FFCO.

The Revision 10.0 proposal is provided as Attachment A. Proposed revision text, using the redline/strikeout method, is provided as Attachment B. A clean copy version of the proposed CPV text for NMED's approval is provided as Attachment C. The Certification Statement is provided as Attachment D.

We are available to discuss this information with you at any time. Please contact me at (505) 665-0714 if you have any questions.

Sincerely,



Beverly Martin
STP Project Manager
Los Alamos National Laboratory

Cy (w/encl.):

Mr. James Bearzi, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502



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E-WMOSR Files

Attachment A

Federal Facility Compliance Order

Site Treatment Plan

Compliance Plan Volume

Revision Proposal 10.0

**LOS ALAMOS NATIONAL LABORATORY SITE TREATMENT PLAN
PROPOSED REVISION 10.0**

**LOS ALAMOS NATIONAL LABORATORY FEDERAL FACILITY
COMPLIANCE ORDER**

The purpose of this revision request is to reflect changes in the mixed low-level waste (MLLW) inventories in the Los Alamos National Laboratory (LANL) Compliance Plan Volume (CPV) of the Site Treatment Plan (STP), as described in the Fiscal Year 1999 (FY99) *STP Annual Update*. The changes proposed by this revision to the CPV will allow the added covered wastes to be treated or otherwise managed in accordance with the Activities and Compliance Dates pertaining to each treatability group, as adopted or revised herein. The CPV text changes are indicated in the redline strikeout version provided in Enclosure D. The revised CPV "clean copy" text is provided as Enclosure E.

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

The Department of Energy (DOE) and the University of California (UC) are proposing to revise the Compliance Plan Volume text to reflect the following changes in MLLW covered waste inventories, as described in the FY99 *STP Annual Update*:

- Increases to the STP covered waste inventory due to the addition of newly covered waste during FY99;
- decreases to the STP covered waste inventory due to shipments of covered wastes during FY99;

The volume changes are proposed in accordance with the applicable requirements in the FFCO, as amended: Section VIII, "*Addition of New Covered Waste*"; Section X.B.4, "*Revisions*"; and Section XI, "*Deletion of Waste.*"

Addition of newly covered waste

DOE and UC are requesting that the following waste be added to the STP as covered waste, as described also in the FY99 *STP Annual Update*. The total volume of covered waste that is requested for addition is 12.62 cubic meters

Table X.C.2.a.-1: Proposed Addition of Newly Covered Waste

CPV Section	MWIR Waste ID	Treatability Group	Volume (m ³)
3.1.2	LA-W904	<i>Soil with Heavy Metals</i>	0.68
3.1.3	LA-W906-10	<i>Aqueous Organic Liquids</i>	0.34
3.1.11	LA-W907	<i>Halogenated Organic Liquids</i>	0.007
3.1.11	LA-W908	<i>Nonhalogenated Organic Liquids</i>	0.49
3.1.11	LA-W909	<i>Bulk Oils</i>	0.84
3.1.11	LA-W910	<i>PCB Wastes with RCRA Components</i>	0.0003
3.1.4	LA-W911	<i>Organic-Combustible Solids</i>	0.75
3.1.5	LA-W912	<i>Combustible Debris</i>	0.11
3.1.6	LA-W913	<i>Aqueous Wastes with Heavy Metals</i>	0.98
3.1.6	LA-W914	<i>Corrosive Solutions</i>	0.03
3.1.6	LA-W915	<i>Aqueous, Cyanides, Nitrates, Chromates, and Arsenates</i>	0.0007
3.1.7	LA-W916	<i>Water-Reactive Wastes</i>	0.52
3.1.8	LA-W917	<i>Compressed Gases Requiring Scrubbing</i>	0.01
3.1.9	LA-W918	<i>Compressed Gases Requiring Oxidation</i>	0.04
3.1.4	LA-W919	<i>Organic-Contaminated Noncombustible Solids</i>	4.92
3.1.10	LA-W920	<i>Elemental Mercury</i>	0.006
3.1.5	LA-W921	<i>Activated or Inseparable Lead</i>	0.63
3.1.5	LA-W922	<i>Non-Combustible Debris</i>	2.25
3.1.11	LA-W923	<i>Liquid and Solid Oxidizers</i>	0.01
3.2	LA-W925	<i>Mercury Wastes – TBD</i>	0.01

Deletion of covered waste

DOE and UC are requesting that the following covered waste be deleted from the STP, as also described in the FY99 STP *Annual Update*. These covered wastes were either shipped off-site for treatment and disposal or recycling; treated on-site for lead decontamination; or used in treatability studies. One item was recycled on-site. The total volume of covered waste that is requested for deletion under this Revision to the CPV is 79.25 cubic meters.

Table X.C.2.a.-2: FY99 STP MLLW Off-Site Shipments for Treatment

Date Shipped to TSDF	Date Received at TSDF	Letter Date to NMED	Destination	Waste Type	CPV Volume (m ³)	CPV Section.
11/17/98	11/18/98	12/16/98	WCS	LA-W904 <i>Soil with Heavy Metals</i>	0.45	3.1.2
11/17/98	11/18/98	12/16/98	WCS	LA-W924 <i>Lead Waste-TBD</i>	0.62	3.3

Date Shipped to TSDF	Date Received at TSDF	Letter Date to NMED	Destination	Waste Type	CPV Volume (m ³)	CPV Section.
11/30/98	12/3/99	1/6/99	Perma-Fix	LA-W911 <i>Organic combustible solids</i>	0.75*	3.1.4
11/29/98	12/3/99	1/6/99	Perma-Fix	LA-W919 <i>Organic contaminated noncombustible solids</i>	2.44*	3.1.4
11/29/98	12/3/99	1/6/99	Perma-Fix	LA-W908 <i>Nonhalogenated organic liquids</i>	4.89	3.1.11
11/29/98	12/3/99	1/6/95	Perma-Fix	LA-W927 <i>Biochemical laboratory wastes</i>	1.34	3.2
12/17/98	12/21/98	2/4/99	DSSI	LA-W906 <i>Aqueous organic liquids</i>	0.01	3.1.3
12/17/98	12/21/98	2/4/98	DSSI	LA-W907 <i>Halogenated organic liquids</i>	3.21	3.1.11
12/17/98	12/21/98	2/4/99	DSSI	LA-W908 <i>Nonhalogenated organic liquid</i>	0.56	3.1.11
12/17/98	12/21/98	2/4/99	DSSI	LA-W911 <i>Organic-combustible solids</i>	0.004	3.1.4
2/9/99	2/11/99	3/2/99	Envirocare	LA-W922 <i>Non-combustible debris</i>	5.49	3.1.5
2/9/99	2/11/99	3/2/99	Envirocare	LA-W921 <i>Activated or inseparable lead</i>	0.63	3.1.5
2/23/99	3/1/99	4/7/99	DSSI	LA-W906 <i>Aqueous organic liquids</i>	1.09	3.1.3
2/23/99	3/1/99	4/7/99	DSSI	LA-W907 <i>Halogenated organic liquids</i>	0.004	3.1.11
4/30/99	5/2/99	6/2/99	DSSI	LA-W907 <i>Halogenated organic liquids</i>	0.72	3.1.11
4/30/99	5/2/99	6/2/99	DSSI	LA-W908 <i>Non-halogenated organic liquids</i>	1.94*	3.1.11
4/30/99	5/2/99	6/2/99	DSSI	LA-W909 <i>Bulk oils</i>	0.001	3.1.11
5/18/99	5/20/99	6/28/99	Envirocare	LA-W922 <i>Non-combustible debris</i>	4.79	3.1.5

Date Shipped to TSDF	Date Received at TSDF	Letter Date to NMED	Destination	Waste Type	CPV Volume (m ³)	CPV Section.
7/15/99	7/16/99	8/11/99	WCS	LA-W922 <i>Non-combustible debris</i>	0.64	3.1.5
7/15/99	7/16/99	8/11/99	WCS	LA-930 <i>Lead for surface decontamination</i>	0.84	3.3.1
7/20/99	7/23/99	8/13/99	Perma-Fix	LA-W906 <i>Aqueous organic liquids</i>	0.15*	3.1.3
7/20/99	7/23/99	8/13/99	Perma-Fix	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0.99*	3.1.11
7/26/99	7/27/99	8/11/99	Envirocare	LA-W922 <i>Non-combustible Debris</i>	0.11	3.1.5
7/26/99	7/27/99	8/11/99	Envirocare	LA-W930 <i>Lead for Surface Decontamination</i>	1.74	3.3.1
7/27/99	7/30/99	9/13/99	DSSI	LA-W906 <i>Aqueous organic liquids</i>	2.18	3.1.3
7/27/99	7/30/99	9/13/99	DSSI	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0.0005	3.1.11
7/27/99	7/30/99	9/13/99	DSSI	LA-W919 <i>Organic contaminated noncombustible solids</i>	0.95	3.1.4
8/31/99	9/3/99	10/4/99	Perma-Fix	LA-W921 <i>Activated or Inseparable Lead</i>	0.23	3.1.5
8/31/99	9/3/99	10/4/99	Perma-Fix	LA-W928 <i>Dewatered Treatment Sludge</i>	4.16	3.2
8/31/99	9/2/99	10/1/99	Envirocare	LA-W922 <i>Non-Combustible Debris</i>	1.21*	3.1.5
8/31/99	9/2/99	10/1/99	Envirocare	<i>Proposed</i> LA-W922 <i>Non-Combustible Debris</i>	1.003*	<i>Proposed</i> 3.1.5
9/16/99	9/17/99	10/1/99	WCS	LA-W922 <i>Non-Combustible Debris</i>	3.45	3.1.5
9/16/99	9/17/99	10/1/99	WCS	<i>Proposed</i> LA-W922 <i>Non-Combustible Debris</i>	2.75	<i>Proposed</i> 3.1.5
9/20/99	9/23/99	10/25/99	Perma-Fix	LA-W906 <i>Aqueous Organic Liquids</i>	2.74	3.1.3
9/20/99	9/23/99	10/25/99	Perma-Fix	LA-W921 <i>Activated or</i>	0.23	3.1.5

Date Shipped to TSDF	Date Received at TSDF	Letter Date to NMED	Destination	Waste Type	CPV Volume (m ³)	CPV Section.
				<i>Inseparable Lead</i>		
9/20/99	9/24/99	10/26/99	DSSI	LA-W906 <i>Aqueous Organic Liquids</i>	0.95	3.1.3
9/20/99	9/24/99	10/26/99	DSSI	LA-W911 <i>Organic Combustible Solids</i>	0.01	3.1.4
9/20/99	9/24/99	10/26/99	DSSI	LA-W907 <i>Halogenated Organic Liquids</i>	0.25	3.1.11
9/20/99	9/24/99	10/26/99	DSSI	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0.49	3.1.11
TOTALS					54.01	

*Volumes previously reported incorrectly to NMED, see Table 8 below for more complete explanation of discrepancies.

Table X.C.2.a.-3: FY99 STP MLLW Off-Site Shipments for Recycling

Date Shipped	Shipment Received Date	Letter Date to NMED	Destination	Waste Type	CPV Volume Treated (m ³)	CPV Sec.
1/12/99	1/14/99	2/4/99	GTS Duratek	LA-W921 <i>Activated or inseparable lead</i>	2.6	3.1.5
1/12/99	1/14/99	2/4/99	GTS Duratek	LA-W924 <i>Lead waste -TBD</i>	0.34	3.2
1/12/99	1/14/99	2/4/99	GTS Duratek	LA-W930 <i>Lead for Surface Decontamination</i>	0.28	3.3.1
4/19/99	4/20/99	5/18/99	GTS Duratek	LA-W930-0 <i>Lead for surface decontamination</i>	3.23	3.3.1
5/25/99	5/27/99	6/25/99	GTS Duratek	LA-W922 <i>Non-combustible debris</i>	3.05	3.1.5
5/25/99	5/27/99	6/25/99	GTS Duratek	LA-W930 <i>Lead for surface decontamination</i>	0.56	3.3.1
8/10/99	8/13/99	9/13/99	GTS Duratek	LA-W930 <i>Lead for surface decontamination</i>	10.76	3.3.1
TOTALS					20.82	

Table X.C.2.a.- 4: FY99 STP MLLW On-Site Lead Decontamination

Date Shipped	Shipment Received Date	Destination	Waste Type	CPV Volume Treated (m ³)	CPV Section
11/16/98	11/16/98	LANL, TA-50	LA-W930 <i>Lead for Surface Decontamination</i>	1.78	3.3.1
11/17/98	11/17/98	LANL, TA-50	LA-W930 <i>Lead for Surface Decontamination</i>	2.29	3.3.1
TOTALS				4.07	

Table X.C.2.a.-5: FY99 STP MLLW On-Site Recycling

Date Shipped	Shipment Received Date	Letter Date to NMED	Destination	Waste Type	CPV Volume Treated (m ³)	CPV Section
1/20/99	1/20/99	2/24/99	LANL, TA-9	LA-W932 <i>Explosives</i>	0.000001	3.2

Table X.C.2.a.-6: FY99 STP MLLW Off-Site Shipments for Treatability Studies.

Date Shipped	Shipment Received Date	Letter Date to NMED	Destination	Waste Type	CPV Volume Treated (m ³)	CPV Sec.
11/5/98	11/9/98	10/19/94	IT	LA-W917 <i>Compressed Gases Requiring Scrubbing</i>	0.07	3.1.8
11/5/98	11/9/98	10/19/94	IT	LA-W918 <i>Compressed Gases Requiring Oxidation</i>	0.03	3.1.9
7/16/99	7/16/99	9/3/99	LANL, TA-46	LA-W925 <i>Mercury Wastes, TBD</i>	0.007	3.2
7/26/99	7/26/99	9/3/99	LANL, TA-46	LA-W925 <i>Mercury Wastes, TBD</i>	0.23	3.2
TOTALS					0.34	

Adjustments to the original (October 4, 1995) STP covered waste inventory

DOE and UC are requesting the following adjustments to the original (October 4, 1995) STP covered waste inventory. Most administrative adjustments are due to discrepancies found during quality control activities related to preparing waste for treatment and disposal. These adjustments result in additions of newly found covered waste, transfers of waste to other treatability groups, or transfers of waste to the missing/nonexistent/TBV category of the STP. Other administrative adjustments are due to further characterization of waste resulting in transfers to other treatability groups.

Table X.C.2.a.-7: Proposed Administrative Adjustments

MWIR Waste ID	Treatability Group	Volume (m ³)	Comments	CPV Section
LA-W922	<i>Non-combustible Debris</i>	0.21	Transfer to Missing	3.1.5
LA-W925	<i>Mercury Wastes – TBD</i>	0.001	Transfer to Missing	3.2
LA-W920	<i>Elemental Mercury</i>	0.0000	Transfer to Missing	3.1.10
N/A	<i>Missing/nonexistent/TBV category</i>	0.21 0.001 0.0000	Transfer from LA-W922 Transfer from LA-W925 Transfer from LA-W920	3.4
LA-W922	<i>Non-combustible Debris</i>	0.009	Transfer to LA-W917	3.1.5
LA-W917	<i>Compressed Gases Requiring Scrubbing</i>	0.009	Transferred from LA-W922	3.1.8
LA-W912	<i>Combustible Debris</i>	0.11	Transfer to LA-W916	3.1.5
LA-W916	<i>Water-Reactive Wastes</i>	0.11	Transferred from LA-W912	3.1.7
LA-W925-6	<i>Mercury Wastes - TBD</i>	2.61	Omitted from table in FY98 Update by mistake.	3.2
LA-W930	<i>Lead for Surface Decontamination</i>	(0.66)	Actual volume less than previously reported volume.	3.3.1

Table X.C.2.a.-7a: Additional Proposed Administrative Adjustments

MWR Waste ID	Treatability Group	Volume (m ³)	Comments	CPV Section
LA-W907	<i>Halogenated Organic Liquids</i>	0.59 (0.59) 0.02 (0.2)	Should have been in original inventory Shipped to DSSI on 3/28/00 Shipment delayed by fire Item shipped to DSSI on 6/27/00	3.1.11
LA-W908	<i>Nonhalogenated Organic Liquids</i>	0.11 (0.11)	Should have been in original inventory Shipped to DSSI on 6/27/00	3.1.11
LA-W909	<i>Bulk Oils</i>	0.28 (0.28) 0.38	Adding early Shipped to DSSI on 3/28/00 Adding early	3.1.11
LA-W911	<i>Organic Combustible Solids</i>	(0.2) 0.11 (0.11) 0.4	Transfer to Missing Returned from treatability study Shipped to Perma-Fix on 7/28/00 Adding early	3.1.4
LA-W915	<i>Aqueous Cyanides, Nitrates, Cromates, Arsenates</i>	0.00004	Transferred from LA-922	3.1.6
LA-W916	<i>Water-Reactive Wastes</i>	0.34	Transferred from LA-W922	3.1.7
LA-W919	<i>Organic Contaminated Noncombustible Solids</i>	0.08* (0.08)	Shipment delayed by fire Shipped to ATG on 5/31/00	3.1.4
LA-W922	<i>Non-combustible Debris</i>	(0.34) (0.00004) (0.001) (0.01) (0.11)	Transfer to LA-W916 Transfer to LA-W915 Transfer to LA-W933 Transfer to LA-W925-6 Transfer to LA-W934	3.1.5
LA-W923	<i>Liquid and Solid Oxidizers</i>	(.05)	Transfer to LA-W933	3.1.11
LA-W924	<i>Lead Wastes – TBD</i>	(4.79)	Transfer to LA-W934	3.2
LA-W926	<i>Compressed Gases-TBD</i>	(0.19)	Transfer to LA-W934	3.2
LA-W925-6	<i>Mercury Wastes – TBD</i>	0.01	Transferred from LA-W922	3.2
LA-W931	<i>Lead Requiring Sorting</i>	(0.11)	Transfer to Missing	3.3.3
LA-W933	<i>Lab Packs</i>	0.001 0.05	Transferred from LA-W922 Transferred from LA-W923	3.2
LA-W934	<i>High Activity Waste</i>	0.11 4.79 0.19 0.01	Transferred from LA-W922 Transferred from LA-W924 Transferred from LA-W926 Adding early	3.2
N/A	<i>Missing/nonexistent/TB V category</i>	0.2 0.11	Transferred from LA-W911 Transferred from LA-W931	3.4

*Volume incorrectly reported as 0.11 in letter to NMED dated June 15, 2000.

Discrepancies were found when preparing for the FY99 Annual Update. A thorough data quality review was conducted to compare shipment notifications with shipping manifests against database updates. These discrepancies are also described in the FY99 Annual Update to the STP.

Table X.C.2.a.- 8: Discrepancies

NMED Letter	MWIR Waste ID	Treatability Group	Reported Volume Shipped (m ³)	Actual Volume Shipped (m ³)	Comment
1/6/99	LA-W911	<i>Organic-Combustible Solids</i>	0.55	0.75	One item of 0.21 m ³ reported as LA-W911, should have been LA-W919
	LA-W919	<i>Organic Contaminated Noncombustible Solids</i>	2.65	2.44	
6/2/99	LA-W908	<i>Nonhalogenated Organic Liquids</i>	2.01	1.94	One item reported at 0.21 m ³ should have been 0.14 m ³
8/13/99	LA-W906	<i>Aqueous Organic Liquids</i>	0.0005	0.15	Incorrectly reported volume of LA-W906. All containers from LA-W907 removed from shipment. One item from LA-W908 pulled from shipment.
	LA-W907	<i>Halogenated Organic Liquids</i>	0.20	0.00	
	LA-W908	<i>Nonhalogenated Organic Liquids</i>	1.03	0.99	
10/1/99	LA-W922	<i>Noncombustible Debris</i>	1.003	1.214	Switched reported volumes by mistake
	Proposed LA-W922	<i>Proposed Noncombustible Debris</i>	1.214	1.003	

Creation of a new Treatability Group

DOE and UC propose the creation of a new treatability group, LA-W934, “*High Activity Waste*” under Section 3.2, “*Mixed Waste Requiring Further Characterization or For Which Technology Assessment Has Not Been Done.*” DOE and UC are not requesting any changes to the existing milestone activities under this section.

Extension of Milestone Activity 3.1.10 (A) for LA-W920, “Elemental Mercury”

DOE and UC propose the extension of Milestone Activity 3.1.10(A), “*Complete shipping of existing wastes to an off-site treatment facility or complete parallel option.*” The compliance date requested for completion of this activity is 11/15/01, consisting of a one year extension.

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

1. Addition of newly covered waste

The increases in covered waste inventory as of the end of FY99 are attributed primarily to waste that was newly generated in FY98 which was not treated within 12 months of generation, thereby becoming covered waste during FY99. Approval of these proposed additions to the STP inventory will allow the added covered wastes to be treated or otherwise managed in accordance with the activities and compliance dates pertaining to each treatability group, as adopted or revised herein.

2. Deletion of covered waste

The decreases in covered waste inventory reflect the treatment and disposal or recycling of covered waste at off-site commercial facilities, recycling activities at the on-site decontamination facility, or the participation in treatability studies during FY99. Deletion of this covered waste is proposed in order to more accurately reflect the DOE and UC STP inventory as of the end of FY99.

3. Adjustments to the original (October 4, 1995) STP covered waste inventory.

Administrative adjustments are due to discrepancies found during quality control activities related to preparing waste for treatment and disposal. These adjustments result in additions of newly found covered waste, transfers of waste to other treatability groups, or transfers of waste to the *missing/nonexistent/TBV category* of the STP. The adjustments to the original (October 4, 1995) STP covered waste inventory are proposed in order to more accurately reflect the DOE and UC STP inventory as of the end of FY99.

4. Creation of a new Treatability Group

DOE and UC propose the creation of a new treatability group, LA-W934, "*High Activity Waste*" under Section 3.2, "*Mixed Waste Requiring Further Characterization or For Which Technology Assessment Has Not Been Done.*" As each STP treatability group of MLLW in storage at LANL is "worked off", high activity items are remaining because they are not able to be shipped or treated along with the items in their current treatability group. The high activity waste does not currently have an identified treatment and disposal path. DOE and UC propose to transfer the high activity items from the existing treatability groups into the new treatability group, "*High Activity Waste,*" and determine treatment options under the existing plan and schedule under Section 3.2.

5. Extension of Milestone Activity 3.1.10 (A) for LA-W920, "Elemental Mercury"

Waste in Treatability Group LA-W920, "*Elemental Mercury,*" has been prepared for shipment for treatment to a new facility, located in Oak Ridge, Tennessee. The facility

has received a permit to treat mercury waste but it is not currently operational. DOE and UC prefer not to ship the mercury waste to this facility if they are only able to put the waste into storage at this time. A one-year extension of the November 15, 2000 milestone should allow the facility enough time to become operational or for other commercial facilities to develop the capabilities for treating this waste.

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

The proposal to add Treatability Group LA-W934, "*High Activity Waste*" to Section 3.2, "*Mixed Waste Requiring Further Characterization for Which Technology Assessment Has Not Been Done*" does not include any requests for new milestone activity dates.

Approval for extension of Milestone Activity 3.1.10 (A) will result in an unavoidable one year delay in treatment and disposal of waste in Treatability Group LA-W920, "*Elemental Mercury*".

No delay in performance is anticipated for any other proposals stated in this requested revision to the Compliance Plan Volume of the Site Treatment Plan.

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

The proposed plan and schedule for Milestone Activity 3.1.10 (A) is:

"Complete shipping of existing wastes to an on off-site treatment facility or complete parallel option," Compliance Date 11/15/01.

All other measures proposed could be implemented within the framework of the existing plan and schedule for the STP.

Attachment B

Revision Proposal 10.0

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Compliance Plan Volume

Site Treatment Plan

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 a schedule for off-site transportation for treatment, or completion of parallel options as defined in each Treatability Group Section, 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.

- | |
|--|
| <ul style="list-style-type: none">A. Identify and develop technology.B. Submit permit application to NMED; orC. 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. | Meet all regulatory requirements for shipment. |
| B. | 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.	Meet all regulatory requirements for off-site shipment.
C.	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.	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.	Meet all regulatory requirements to include RCRA Permit modifications for residual or newly generated waste streams after treatment or recycling.
F.	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.

- | |
|---|
| <ul style="list-style-type: none">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.

2.6 Recycling/Re-Use.

Respondent will pursue on-site or off-site recycling/re-use as a parallel preferred option.

Should DOE elect to use recycling facilities in lieu of (or in combination with) treatment, it will follow requirements as if the waste were shipped off-site for treatment. Any and all requirements by the recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the 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 an off-site non-commercial recycling 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 recycling 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 recycling facility. Activities for mixed waste to be recycled are identified in Table VI.

Should DOE elect to use recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements 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 a recycling facility.

Table VI. Activities for Mixed Waste to be Recycled.

- | |
|---|
| <p>A. Meet all regulatory requirements for recycling/re-use.</p> <p>B. Provide documentation to NMED that waste has been received at recycling facility within 45 working days of receipt of waste at the recycling facility.</p> |
|---|

2.7 On-Site Radiological Decontamination.

DOE will pursue on-site radiological surface or external decontamination as a preferred option. No volumetric or internal decontamination processes will be considered or performed. Surface 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 (Recycling/Re-Use) or be proposed for deletion in accordance with Section IX

(DELETION OF WASTE) of the FFCO. Activities for mixed waste to be radiologically decontaminated are identified in Table VII.

Table VII. Activities for Mixed Waste to be Radiologically Decontaminated.

- | |
|--|
| <ul style="list-style-type: none">A. Meet all DOE requirements for radiological decontamination.B. Provide documentation to NMED that waste has been received at recycling facility within 45 working days of receipt of waste at the recycling facility; orC. Propose waste for deletion in accordance with Section IX of the 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 treatability 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 0.68
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	0	0.00
Totals			3	0.45 0.68

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	137	3.49 0.53
Totals			137	3.49 0.53

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,	88	5.74
	LA-W906-9	D006, D007, D008, D009,	11	0.02
	LA-W906-10	D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005		1.93
Totals			99	5.76 1.93

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	-374	33.29 33.37
Totals			-374	33.29 33.47

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	-213	22.45 23.56
Totals			-213	22.45 23.56

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	-104	15.17
Totals			-104	15.17

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
activated or inseparable lead	LA-W921	D008	-33	6.88 3.82
noncombustible debris	LA-W922	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	-198	40.46 19.54
Totals			-231	47.34 23.35

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	168	4.40 5.24
corrosive solutions	LA-W914	D001, D002	212	1.23 1.25
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	16	0.94
Totals			396	6.57 7.43

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	-39	-1.49 2.35
Totals			-39	-1.49 2.35

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	-15	0.35 0.30
Totals			-15	0.35 0.30

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	-200	-1.74 1.73
Totals			-200	-1.74 1.73

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	0.64 0.65
Totals			79	0.64 0.65

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 11/15/01
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

3.1.11 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	-421	6.62 1.45
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	-901	16.56 7.62
bulk oils	LA-W909	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	-40	5.15 5.54
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	-47	3.19
Totals			-1409	31.52 17.42

Treatability group	MWIR waste ID	RCRA codes	Number of items	Net volume (m ³)
Liquid and solid oxidizers	LA-W923	D001, D003, D005	-92	1.37 1.32
Totals			-92	1.37 1.32

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	26	18.86 13.11
mercury wastes - TBD	LA-W925-0	D007, D008, D009, F001	59	6.42 6.19
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	1	0.19 0.00
biochemical laboratory wastes	LA-W927	D001, D003	9	1.34 0.00
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	61	12.71 8.55
Totals			156	39.52 27.85

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 2.62
explosives	LA-W932	D003	1	0.000001 0.00
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	160	0.31 0.33
High activity waste	LA-W934	D001, D003, D008, D009		5.1
Totals			235	2.92 8.05

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 decontamination	LA-W930-0	0	0.00	40	37.81	40	37.81
	LA-W930-5				0.00		0.00
Totals		0	0.00	40	37.81 0.00	40	37.81 0.00

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
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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 decontamination	LA-W930-6	0	0.00	14	12.06 4.25	14	12.06 4.25
Totals		0	0.00	14	12.06 4.25	14	12.06 4.25

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 0.97
Totals			12	1.08 0.97

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	59 66	11.64 12.16
Totals		59 66	11.64 12.16

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, 2004
B. Submit permit application amendment or modification to NMED for treatment of MTRU	December 31, 2004
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. Should WIPP open, the DOE will begin to transport MTRU for disposal as soon as possible, and not wait until the compliance dates under Activity A and B occur (if applicable).

**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 ~~nine~~ ten revisions and ~~two~~ three 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 <i>Annual Updates</i> (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	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain 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	11/30/98	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,

Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.
Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	<i>to be added</i>	Added and deleted volumes reported in FY98 <i>Annual Update</i> to certain treatability groups.
Amendment 3.0	STP/CPV	8/30/99	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.
Rev. 10.0	STP/CPV	<i>to be added</i>	Added and deleted volumes reported in FY99 <i>Annual Update</i> to certain treatability groups.

**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 Revisiozn 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
Rev. 8.0	No changes in volumes
Rev. 9.0	Increased and decreased volumes in several treatability groups
Rev. 10.0	Increased and decreased 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, 9.0, and 10.0. 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.~~

Attachment C

Revision Proposal 10.0

Clean Copy

Compliance Plan Volume

Site Treatment Plan

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 a schedule for off-site transportation for treatment, or completion of parallel options as defined in each Treatability Group Section, 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.	Meet all regulatory requirements for shipment.
B.	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.	Meet all regulatory requirements for off-site shipment.
C.	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.	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.	Meet all regulatory requirements to include RCRA Permit modifications for residual or newly generated waste streams after treatment or recycling.
F.	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.

- | |
|---|
| <ul style="list-style-type: none">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.

2.6 Recycling/Re-Use.

Respondent will pursue on-site or off-site recycling/re-use as a parallel preferred option.

Should DOE elect to use recycling facilities in lieu of (or in combination with) treatment, it will follow requirements as if the waste were shipped off-site for treatment. Any and all requirements by the recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the 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 an off-site non-commercial recycling 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 recycling 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 recycling facility. Activities for mixed waste to be recycled are identified in Table VI.

Should DOE elect to use recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements 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 a recycling facility.

Table VI. Activities for Mixed Waste to be Recycled.

- | |
|---|
| <p>A. Meet all regulatory requirements for recycling/re-use.</p> <p>B. Provide documentation to NMED that waste has been received at recycling facility within 45 working days of receipt of waste at the recycling facility.</p> |
|---|

2.7 On-Site Radiological Decontamination.

DOE will pursue on-site radiological surface or external decontamination as a preferred option. No volumetric or internal decontamination processes will be considered or performed. Surface 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 (Recycling/Re-Use) or be proposed for deletion in accordance with Section IX

(DELETION OF WASTE) of the FFCO. Activities for mixed waste to be radiologically decontaminated are identified in Table VII.

Table VII. Activities for Mixed Waste to be Radiologically Decontaminated.

- | |
|--|
| <ul style="list-style-type: none">A. Meet all DOE requirements for radiological decontamination.B. Provide documentation to NMED that waste has been received at recycling facility within 45 working days of receipt of waste at the recycling facility; orC. Propose waste for deletion in accordance with Section IX of the 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	Net volume (m ³)
IPA wastes	LA-W901	D001, D009, F002, F003, F005	0.00
scintillation fluids	LA-W902	D001, F003, F005	0.00
Totals			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 treatability 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	Net volume (M ³)
lead blankets	LA-W903	D007, D008	0.00
soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	0.68
ER soils	LA-W905	D028, D029, F001, F005, D010, D011	0.00
Totals			0.68

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	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	0.53
Totals			0.53

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	Net volume (m ³)
aqueous organic liquids	LA-W906-6 LA-W906-9 LA-W906-10	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	1.93
Totals			1.93

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	Net volume (m ³)
organic-contaminated combustible solids	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	33.47
Totals			33.47

Treatability group	MWIR waste ID	RCRA codes	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	23.56
Totals			23.56

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	Net volume (m ³)
combustible debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	15.17
Totals			15.17

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
activated or inseparable lead	LA-W921	D008	3.82
noncombustible debris	LA-W922	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	19.54
Totals			23.35

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	Net volume (m ³)
aqueous wastes with heavy metals	LA-W913	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011	5.24
corrosive solutions	LA-W914	D001, D002	1.25
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	0.94
Totals			7.43

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	Net volume (m ³)
water-reactive wastes	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	2.35
Totals			2.35

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	Net volume (m ³)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	0.30
Totals			0.30

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	Net volume (m ³)
compressed gases requiring oxidation	LA-W918	D001, U226	1.73
Totals			1.73

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	Net volume (m ³)
elemental mercury	LA-W920	D006, D009, F005	0.65
Totals			0.65

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	11/15/01
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

3.1.11 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	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	1.45
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	7.62
bulk oils	LA-W909	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	5.54
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	3.19
Totals			17.42

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
Liquid and solid oxidizers	LA-W923	D001, D003, D005	1.32
Totals			1.32

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	Net volume (m ³)
lead wastes - TBD	LA-W924	D003, D008	13.11
mercury wastes - TBD	LA-W925-0	D007, D008, D009, F001	6.19
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	0.00
biochemical laboratory wastes	LA-W927	D001, D003	0.00
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	8.55
Totals			27.85

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	Net volume (m3)
mercury wastes-TBD	LA-W925-4 LA-W925-5 LA-W925-6	D003, D007, D008, D009, F001, F002, F005	2.62
explosives	LA-W932	D003	0.00
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	0.33
High activity waste	LA-W934	D001, D003, D008, D009	5.1
Totals			8.05

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	Totals
		Net volume (m ³)	Net volume (m ³)	Net volume (m ³)
lead for surface decontamination	LA-W930-0 LA-W930-5	0.00	0.00	0.00
Totals		0.00	0.00	0.00

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	Totals
		Net volume (m ³)	Net volume (m ³)	Net volume (m ³)
lead for surface decontamination	LA-W930-6	0.00	4.25	4.25
Totals		0.00	4.25	4.25

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	Net volume (m ³)
nonradioactive or suspect waste items to be surveyed	LA-W929-0(1)	0.0
nonradioactive or suspect waste items to receive RCRA and radiological characterization	LA-W929-0(2)	0.00
nonradioactive or suspect waste items that cannot or should not be sampled	LA-W929-0(3)	0.0
Totals		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	Net volume (m ³)
Nonradioactive or suspect waste items	LA-W929-5	0.00
Totals		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	Net Volume (m ³)
Lead requiring sorting	LA-W931	D008	0.97
Totals			0.97

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	66	12.16
Totals		66	12.16

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, 2004
B. Submit permit application amendment or modification to NMED for treatment of MTRU	December 31, 2004
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. Should WIPP open, the DOE will begin to transport MTRU for disposal as soon as possible, and not wait until the compliance dates under Activity A and B occur (if applicable).

**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 ten revisions and three 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 <i>Annual Updates</i> (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	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain 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	11/30/98	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,

Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.
Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	<i>to be added</i>	Added and deleted volumes reported in FY98 <i>Annual Update</i> to certain treatability groups.
Amendment 3.0	STP/CPV	8/30/99	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.
Rev. 10.0	STP/CPV	<i>to be added</i>	Added and deleted volumes reported in FY99 <i>Annual Update</i> to certain treatability groups.

CPV APPENDIX B.
SUMMARY OF CPV INVENTORY CHANGES

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
Rev. 8.0	No changes in volumes
Rev. 9.0	Increased and decreased volumes in several treatability groups
Rev. 10.0	Increased and decreased 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, 7.0, 9.0, and 10.0. 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.

APPENDIX B

TABLE B-1

STP/FFCO MLLW INVENTORY THROUGH REV. 10

TABLE B-1. STP/FFCO MLLW INVENTORY THROUGH REV. 10.

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Comments	FY99 Annual Update (m ³)	Revised Revision 10.0 (m ³)	Comments
3.1.1	LA-W901 IPA Wastes	0.00			0.00		
3.1.1	LA-W902 Scintillation Fluids	0.00			0.00		
3.1.2	LA-W903 Lead Blankets	0.00			0.00		
3.1.2	LA-W904 Soil with Heavy Metals	0.45	(0.45) 0.68	Shipped off-site for treatment Newly generated	0.68		
3.1.2	LA-W905 ER Soils	0.00			0.00		
3.1.3	LA-W906 Aqueous Organic Liquids	9.25	(0.01) (1.09) (0.15) (2.18) (2.74) (0.95) (0.01) (0.0005) 0.34	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	2.46		
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	33.29	(0.75) (0.004) (0.01) (0.001) (0.006) 0.75	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	33.27	(0.2) 0.11 (0.11) 0.4	Transfer to Missing Returned from treatability study Shipped to Perma-fix on 7/28/00 Adding early
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	22.45	(2.44) (0.95) (0.42) 4.92	Shipped off-site for treatment Shipped off-site for treatment SSD Project Newly generated	23.56	0.08 (0.08)	Shipment delayed by fire Shipped to ATG on 5/31/00
3.1.5	LA-W912 Combustible Debris	15.17	(0.003) 0.11	SSD Project Newly generated	15.28		
3.1.5	LA-W921 Activated or Inseparable Lead	6.88	(0.63) (0.23) (0.23) (2.6) 0.63	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for recycling Newly generated	3.82		
3.1.5	LA-W922 Noncombustible Debris	40.46	(5.49) (4.79) (0.64) (0.11) (1.21) (1.003) (3.45) (2.75) (3.05) (0.0009) (0.21) (0.009) 2.25	Shipped off-site for treatment Shipped off-site for recycling SSD Project Transfer to Missing Transfer to LA-W917 Newly generated	20.00	(0.34) (0.00004) (0.001) (0.01) (0.11)	Transfer to LA-W916 Transfer to LA-W915 Transfer to LA-W933 Transfer to LA-W925-6 Transfer to LA-W934
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	4.40	(0.14) 0.98	SSD Project Newly generated	5.24		
3.1.6	LA-W914 Corrosive Solutions	1.23	(0.008) (0.006) 0.03	SSD Project SSD Project Newly generated	1.25		
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.94	0.0007	Newly generated	0.94	0.00004	Transferred from LA-W922
3.1.7	LA-W916 Water-Reactive Wastes	1.49	(0.0004) 0.52	SSD Project Newly generated	2.01	0.34	Transferred from LA-W922
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35	(0.07) 0.009 0.01	Treatability study Transferred from LA-W922 Newly generated	0.30		

TABLE B-1. STP/FFCO MLLW INVENTORY THROUGH REV. 10.

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Comments	FY99 Annual Update (m ³)	Revised Revision 10.0 (m ³)	Comments
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.74	(0.03) (0.02) (0.005) 0.04	Treatability study SSD Project SSD Project Newly generated	1.73		
3.1.10	LA-W920 Elemental Mercury	0.64	0.006	Newly generated	0.65		
3.1.11	LA-W907 Halogenated Organic Liquids	6.62	(3.21) (0.004) (0.72) (0.25) (0.99) (0.0005) 0.007	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	1.45	0.59 (0.59) 0.02 (0.2)	Should have been in original inventory Shipped to DSSI 3/28/00 Shipment delayed by fire Item shipped to DSSI on 6/27/00
3.1.11	LA-W908 Nonhalogenated Organic Liquids	16.56	(4.89) (0.56) (1.94) (0.99) (0.0005) (0.49) (0.5) (0.06) 0.49	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	7.62	0.11 (0.11)	Should have been in original inventory Shipped to DSSI on 6/27/00
3.1.11	LA-W909 Bulk Oils	5.15	(0.001) (0.83) 0.84	Shipped off-site for treatment SSD Project Newly generated	5.16	0.28 (0.28) 0.38	Adding early Shipped to DSSI on 3/28/00 Adding early
3.1.11	LA-W910 PCB Wastes with RCRA Components	3.19	0.0003	Newly generated	3.19		
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.37	(0.007) 0.01	SSD Project Newly generated	1.37	(.05)	Transfer to LA-W933
3.2	LA-W924 Lead Wastes - TBD	18.86	(0.62) (0.34)	Shipped off-site for treatment Shipped off-site for recycling	17.90	(4.79)	Transfer to LA-W934
3.2	LA-W925 Mercury Wastes - TBD	6.42 2.61*	(0.007) (0.23) (0.003) 0.01	Treatability study Treatability study SSD Project Newly generated	6.19 2.61	0.01	Transferred from LA-W922
3.2	LA-W926 Compressed Gases - TBD	0.19			0.19	(0.19)	Transfer to LA-W934
3.2	LA-W927 Biochemical Laboratory Wastes	1.34	(1.34)	Shipped off-site for treatment	0.00		
3.2	LA-W928 Dewatered Treatment Sludge	12.71	(4.16)	Shipped off-site for treatment	8.55		
3.2	LA-W932 Explosives	0.000001	0.000001	On-site Recycle	0.00		
3.2	LA-W933 Lab Packs	0.31	(0.03)	SSD Project	0.28	0.001 0.05	Transferred from LA-W922 Transferred from LA-W923
3.2	LA-W934 High Activity Waste					0.11 4.79 0.19 0.01	Transferred from LA-W922 Transferred from LA-W924 Transferred from LA-W926 Adding early

TABLE B-1. STP/FFCO MLLW INVENTORY THROUGH REV. 10.

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision (m ³)	Comments	FY99 Annual Update (m ³)	Revised Revision (m ³)	Comments
3.3.1	LA-W930 Lead for Surface Decontamination	37.81	(0.84) (1.74) (0.28) (3.23) (0.56) (10.76) (1.78) (2.29) (11.42) (0.66)	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for recycling Shipped off-site for recycling Shipped off-site for recycling Shipped off-site for recycling On-Site lead decon On-Site lead decon Approved for transfer to MTRU (Amendment 3.0) Administrative Adjustment	4.25		
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00			0.00		
3.3.3	LA-W931 Lead Requiring Sorting	1.08			1.08	(0.11)	Transfer to missing
3.4	Missing/ nonexistent/ TBV category	11.64	0.21	Transferred from LA-W922	11.85	0.2 0.11	Transferred from LA-W911 Transferred from LA-W931
	TOTALS	261.99 2.61*	(81.74)		182.88		

*Omitted from FY98 Update by mistake.

APPENDIX B

TABLE B-2

STP/FFCO MLLW INVENTORY THROUGH REV. 9

TABLE B-2. FFCO/STP MLLW INVENTORY THROUGH REV. 9.0.

CPV Sec.	MWIR Waste ID and Treatability Group Category	3/98 Annual Update (m ³)	Revision 7.0 (m ³)	Proposed Revision 9.0 (m ³)	Comments	FY98 Annual Update (m ³)	Projection FY99-FY03 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00	0.00			0.00	0.00
3.1.1	LA-W902 Scintillation Fluids	0.00	0.00			0.00	0.00
3.1.2	LA-W903 Lead Blankets	0.00	0.00			0.00	0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.55*	0.45			0.45	0.00
3.1.2	LA-W905 ER Soils	0.00	0.00			0.00	0.00
3.1.3	LA-W906 Aqueous Organic Liquids	15.70	16.06	(2.91) (3.92) 0.02 0.001	Shipped off-site for treatment Shipped off-site for treatment Newly generated Administrative adjustments	9.25	0.00
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	35.39	36.07	(3.54) (0.0001) 0.64 0.12	Shipped off-site for treatment Shipped off-site for treatment Newly generated Administrative adjustments	33.29	0.00
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	26.93	27.31	(6.45) 1.59	Shipped off-site for treatment Newly generated	22.45	0.00
3.1.5	LA-W912 Combustible Debris	14.42	15.17	(0.00005)	Shipped off-site for treatment	15.17	0.00
3.1.5	LA-W921 Activated or Inseparable Lead	7.10	7.30	(0.21)** (0.32) 0.11	On-site Lead Decon Transferred to LA-W910 Administrative adjustments	6.88	0.00
3.1.5	LA-W922 Noncombustible Debris	33.63	36.46	(2.02) (0.008) 5.40 0.63	Treatability Study Treatability Study Newly generated Administrative adjustments	40.46	0.00
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	2.67	3.07	(0.004) 1.33	Shipped off-site for treatment Newly generated	4.40	0.00
3.1.6	LA-W914 Corrosive Solutions	0.85	1.21	(0.00003) 0.01 0.006	Treatability Study Newly generated Administrative adjustments	1.23	0.00
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.17	0.17	(0.14) 0.91	Treatability Study Newly generated	0.94	0.00
3.1.7	LA-W916 Water-Reactive Wastes	6.74	7.05	(5.70) (0.22) 0.05 0.42 (0.11)	Shipped off-site for treatment Shipped off-site for treatment Newly generated Administrative adjustments Transferred to LA-W908	1.49	0.00
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35	0.63	(0.28)	Treatability Study	0.35	0.00
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.09	1.78	(0.05) 0.006	Treatability Study Administrative adjustments	1.74	0.00
3.1.10	LA-W920 Elemental Mercury	0.64	0.66	(0.02) 0.002	Treatability Study Newly generated	0.64	0.00
3.1.11	LA-W907 Halogenated Organic Liquids	17.21	18.30	(4.97) (6.94) 0.02 0.21	Shipped off-site for treatment Shipped off-site for treatment Newly generated Administrative adjustments	6.62	0.00
3.1.11	LA-W908 Nonhalogenated Organic Liquids	16.82	20.22	(1.87) (1.65) (0.71) (0.001) 0.41 0.06 (0.01) 0.11	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Treatability Study Newly generated Administrative adjustments Transferred to missing Transferred from LA-W916	16.56	0.00

TABLE B-2. FFCO/STP MLLW INVENTORY THROUGH REV. 9.0.

CRV Sec	MWIR Waste ID and Treatability Group Category	1998 Annual Update (m ³)	Revision 7.0 (m ³)	Proposed Revision 9.0 (m ³)	Comments	FY98 Annual Update (m ³)	Projection FY99-FY03 (m ³)
3.1.11	LA-W909 Bulk Oils	4.33	5.81	(1.08) 0.42	Shipped off-site for treatment Newly generated	5.15	0.00
3.1.11	LA-W910 PCB Wastes with RCRA Components	2.75	2.75	0.10 0.32 0.02	Newly generated Transferred from LA-W921 Transferred from LA-W924	3.19	20.00
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.23	1.37	(0.001)	Shipped off-site for treatment	1.37	0.00
3.2	LA-W924 Lead Wastes - TBD	40.16	40.16	(2.5) (10.54) (5.52) (0.003) (2.82) 0.10 (0.02)	Shipped off-site for treatment Shipped off-site for treatment Off-site Recycle On-site Decon Transferred to missing Administrative adjustments Transferred to LA-W910	18.86	0.00
3.2	LA-W925 Mercury Wastes - TBD	20.49	20.91	(14.49)	Shipped off-site for treatment	6.42	0.00
3.2	LA-W926 Compressed Gases - TBD	1.25	1.25	(1.06)	Treatability Study	0.19	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	1.34	1.34			1.34	0.00
3.2	LA-W928 Dewatered Treatment Sludge	12.71	12.71			12.71	0.00
3.2	LA-W932 Explosives	0.00	0.000001			0.000001	0.00
3.2	LA-W933 Lab Packs	0.13	0.30	(0.001) 0.009	Treatability Study Administrative adjustment	0.31	0.00
3.3.1	LA-W930 Lead for Surface Decontamination	69.38	61.14	(4.99) (6.66) (0.68) (0.09) (2.08) (4.58) (4.25)	Off-site Recycle Off-site Recycle On-site Decon On-site Decon On-site Decon On-site Decon On-site Decon	37.81	0.00
3.3.3	LA-W931 Lead Requiring Sorting	1.06	1.08			1.08	0.00
3.4	Missing/ nonexistent/ TBV category	0.00	8.81	0.01 2.82	Transferred from LA-W908 Transferred from LA-W924	11.64	Not Applicable

*Volume was reported incorrectly as 0.00 cubic meters in FY97 Annual Update.

**Item was successfully decontaminated on 8/23/95 in the on-site decontamination operation, but was not previously reported.

APPENDIX B

TABLE B-3

STP/FFCO MLLW INVENTORY THROUGH REV. 7.

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW INVENTORY CHANGES (THROUGH 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 0.62 ^b					2	0.34		
		Decrease 2			Decrease 0.42 ^c									
					Decrease 46	Decrease 8.91								
					Decrease 2	Decrease 0.14								
		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-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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 Noncombustible 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-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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 0.06 ^f			Increase 1	Increase 0.208	12	3.20	35	7.30
					Decrease 2	Decrease 1.72								
		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		
3.15	Non-combustible Debris	LA-W922-0	41	5.62	Decrease 14	Decrease 2.915					27	2.71	191	36.46
		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		
3.1.6	Aqueous Wastes with Heavy Metals	LA-W913-0	83	1.50							83	1.50	139	3.07
		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		

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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	197	1.21
		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		
3.1.6	Aqueous Cyanides, Nitrates, Chromates, and Arsenates	LA-W915-0	9	0.13							9	0.13	23	0.17
		LA-W915-4	3	0.002							3	0.002		
		LA-W915-5	11	0.04							11	0.04		
3.1.7	Water-Reactive Wastes	LA-W916-0	78	6.03							78	6.03	113	7.05
		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		
3.1.8	Compressed Gases Requiring Scrubbing	LA-W917-0	13	0.35							13	0.35	25	0.63
		LA-W917-7	0	0.00					Increase 12	Increase 0.28	12	0.28		

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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		
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		

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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	Increase 0.47					5	2.00	45	5.81
					Decrease 23	Decrease 2.22								
		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		
3.1.11	PCB Wastes with RCRA Components	LA-W910-0	4	0.74	Increase 6	Increase 0.62 ^b					10	1.36	40	2.75
		LA-W910-6	0	0.00	Increase 30	Increase 1.39					30	1.39		
3.1.11	Liquid and Solid Oxidizers	LA-W923-0	6	0.117							6	0.117	93	1.37
		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		
3.2	Lead Waste - TBD	LA-W924-0	129	40.16							129	40.16	129	40.16

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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	137	20.91
		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		
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	1	0.00000 1
		LA-W932-4	1	0.00000 1							1	0.00000 1		

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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 ^j			7	0.003		
		LA-W933-7	0	0.00					Increase 4	Increase 0.002	4	0.002		
												153	0.30	

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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 0.11 ^k			Increase 0 ^o	Increase 0.095	22	26.16		
					Decrease 4	Decrease 0.35 ^k			Decrease 1	Decrease 0.208				
					Decrease 6	Decrease 1.04								
		LA-W930-5	115	23.75	Decrease 1	Decrease 0.21 ^k					111	22.92		
					Decrease 3	Decrease 0.62 ^k								
		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-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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	Decrease 4.78					0	0.00	12	1.08
		LA-W931-5	8	0.44	Increase 0 ^m	Increase 0.02					8	0.44		
		LA-W931-6	0	0.00	Increase 4	Increase 0.64					4	0.64		
None ⁿ	IPA	None	0	0.00	Increase 1	Increase 0.0005 ⁿ					0	0.00	0	0.00
					Decrease 1	Decrease 0.0005 ⁿ								

**TABLE B-3 SUMMARY TABLE
PREVIOUSLY REPORTED STP/CPV MLLW IVNVENTORY CHANGES (THROUGH 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 m³ 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 m³, as reported in the FY97 STP *Annual Update*, consisted of 1 item (0.11 m³) from subgroup LA-W930-0 and 1 item (0.21 m³) from subgroup -5. The shipment of 0.97 m³, as reported in the FY97 STP *Annual Update*, consisted of 4 items (0.35 m³) from subgroup -0 and 3 items (0.62 m³) 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 results from an error in the original STP inventory data as discussed in Revision 7.0.
- ^p Item found as discussed in Revision 7.0.

APPENDIX B

TABLE B-4

STP/FFCO MLLW INVENTORY THROUGH REV. 4/5.

**TABLE B-4. 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* (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	7	0.02
		LA-W901-5									Increase 0	Increase 4.11 ^c			0	0.00		
3.1.1	Scintillation Fluids	LA-W902-0	18	2.47					Decrease 15	Decrease 2.24	Decrease 2	Decrease 0.36			1	0.0038	1	0.0038
		LA-W902-5									Increase 0	Increase 0.13 ^e			0	0.00		
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 ^{d,1} <i>(see Rev 6.0 for correction)</i>	58	10.33 10.43	59	10.54 10.44
		LA-W904-5									Increase 1	Increase 0.11			1	0.11		

**TABLE B-4. 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* (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 0.0005 ^b		101	8.88 8.31		
												Increase 24	Increase 4.83 4.26 ^{a,1} (see Rev 6.0 for correction)					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-4. 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* (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	177	18.62
		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*		89	10.53		
3.1.5	Combustible Debris	LA-W912-0	83	13.82												83	13.82	97	14.85
		LA-W912-4					Increase 9	Increase 0.75								9	0.75		
		LA-W912-5									Increase 5	Increase 0.28				5	0.28		
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	32	8.12
		LA-W21-5							Increase 51	Increase 10.11	Decrease 45	Decrease 9.05				18	3.35		
										Increase 12	Increase 2.29								

**TABLE B-4. 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* (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 +	Decrease -0002 ^b					41	5.62	157	30.74
		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		
3.1.6	Aqueous Wastes with Heavy Metals	LA-W913-0	203	1.85							Decrease 12	Decrease 0.030			83	1.50	119	2.05
		LA-W913-4					Increase 25	Increase 0.40							25	0.40		
		LA-W913-5									Increase 11	Increase 0.15			11	0.15		
3.1.6	Corrosive Solutions	LA-W914-0	162	1.36							Decrease 102	Decrease 0.67			60	0.69	189	1.17
		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		

**TABLE B-4. 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* (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 0.0002			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		

**TABLE B-4. 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* (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-W918-4					Increase 168	Increase 1.23							168	1.23		
		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

**TABLE B-4. 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* (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	Nonhalogenated Organic Liquids	LA-W908-0	275	14.34												275	14.34	814	20.63
		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			

**TABLE B-4. 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* (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	64	7.51
		LA-W909-4					Increase 8	Increase 1.48							8	1.48		
		LA-W909-5									Increase 28	Increase 2.28			28	2.28		
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	86	0.58
		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		
3.3	Lead Waste - TBD	LA-W924-0	186	51.44					Decrease 57	Decrease 11.28					129	40.16	129	40.16

**TABLE B-4. 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* (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-4. 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* (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 13.97	Decrease 4	Decrease 0.002 ^b	Decrease 2	Decrease 0.00094			2	0.0076 ^f		
		LA-W929-5					Decrease 41	Decrease 0.26 ^d			Decrease 9	Decrease 0.0029					1	0.00002
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	Decrease 5.73			8	0.44		

**TABLE B-4. 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* (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	1	0.000001
		LA-W932-4					Increase 1	Increase 0.000001								1	0.000001		
3.3	Lab Packs	LA-W933-0	0	0.00												0	0.00	142	0.30
		LA-W933-4					Increase 114	Increase 0.17								114	0.17		
		LA-W933-5									Increase 28	Increase 0.13				28	0.13		

**TABLE B-4. 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* (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 0.2082 ^d				
														Increase 41	Increase 0.26 ^d				
														Increase 6	Increase 8.34 ^d			48	8.81

**TABLE B-4. 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 m³) 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 m³ volume shown for LA-W901, and the 0.13m³ 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 m³) 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 m³) and 4 LA-W929 items (0.002 m³) 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 m³ for LA-W904, Rev. 5.0 (Other Changes), the correct decrease is 0.105 m³. Both of these corrections are discussed and implemented in Rev 6.0.

Attachment D

Certification Statement

Federal Facility Compliance Order

Site Treatment Plan

Compliance Plan Volume

Revision Proposal 10.0

CERTIFICATION

**REVISION 10 PROPOSAL
COMPLIANCE PLAN VOLUME
SITE TREATMENT PLAN
LOS ALAMOS NATIONAL LABORATORY**

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
STP Project Manager
Environmental Science and Waste Technology
Los Alamos National Laboratory
Operator

August 24, 2000
Date Signed

James Nunz
Waste Management Program Manager
Los Alamos Area Office
U.S. Department of Energy
Albuquerque Operations
Owner/Operator