Los Alamos National Laboratory

Waste Management Program
Environmental Science and Waste Technology Division
P.O. Box 1663, Mail Stop J591
Los Alamos, New Mexico 87545
(505) 665-8293 / FAX: (505) 665-6727

Date: November 27, 2000
Refer to: E/WM:00-036

Red LANL FFCO/2000

REGISTERED MAIL-RETURN RECEIPT REQUESTED

RECEIVED 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

SUBJECT: PROPOSED TRANSFER OF STP COVERED WASTE, LA-W925-0 TO LA-W925-6. FEDERAL FACILITY COMPLIANCE ORDER (FFCO), SITE TREATMENT PLAN (STP), COMPLIANCE PLAN VOLUME (CPV), LOS ALAMOS NATIONAL LABORATORY (LANL).

Dear Dr. Dinwiddie,

The purpose of this letter is to propose to the New Mexico Environment Department (NMED) the transfer of waste into another subgroup in the LANL FFCO STP. This proposal will be formally submitted to the NMED as part of the next Annual Revision (11.0) to the CPV of the LANL STP, due March 31, 2001.

STP covered waste with a total volume of 6.19 cubic meters is currently reported in the LANL STP in Section 3.2, *"Mixed Waste Requiring Further Characterization of for Which Technology Assessment Has Not Been Done,"* in Treatability Group, *"Mercury Waste –TBD,"* MWIR Waste ID LA-W925-0. A detailed list of these STP items is included with this letter. When preparing the detailed list, I discovered that the actual volume of STP waste in LA-W925-0 is 3.06 cubic meters, not 6.19 cubic meters. The error in reporting occurred because I thought I had left these items out of the FY98 Annual Update, so I added them into the FY99 update, resulting in double counting. I apologize for this confusion. I will plan on correcting this mistake in the FY00 Update.

Milestone Activity 3.2 (E), for LA-W925-0 STP waste, requires that the Department of Energy (DOE) and the University of California (UC), *"(c)omplete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option,"* by the Compliance Date of *"12/20/00."* The mercury waste in this Treatability Group has been prepared for shipment for treatment to a new facility, Materials and Energy Corporation (M&EC),

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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.

DOE and UC are proposing to transfer the STP waste in LA-W925-0 to another subgroup in the same Treatability Group, LA-W925-6. The associated Milestone Activity 3.2 (J) requires that DOE and UC, *"(c)omplete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option,"* by the Compliance Date of 12/30/03. Transfer of the mercury waste from LA-W925-0 to LA-W925-6 with the corresponding Compliance Date of 12/30/03 should allow the facility enough time to become operational or for other commercial facilities to develop the capabilities for treating this waste. DOE and UC will formally propose this transfer in our next Annual Revision Proposal (11.0), due March 31, 2001.

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

Sincerely,

Beverly Martin

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

Cy:

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

STP CD	STP Version	CON ID	ITEM ID	TA	PHY	STP VOL	IWGT(Kg)	STOR CD	Description
LA-W925	REVISION 0	88065800	1040639	3	S	0.2082	226.8	G6	PUMPS W/MERCURY,TRITIUM DRUM #2513
LA-W925	REVISION 0	88065900	1029148	3	S	0.2082	226.8	G6	PUMPS W/MERCURY,TRITIUM DRUM #2514
LA-W925	REVISION 0	88066000	1032082	3	S	0.2082	226.8	G6	PUMPS W/MERCURY, TRITIUM DRUM #2515
LA-W925	REVISION 0	89156900	1031967	55	S	0.053	13.6	MW6	INORGANIC SOLID MIXED WASTE
LA-W925	REVISION 0	89609400	1041261	3	S	0.2082	226.8	G6	MERCURY, TRITIUM CONTAM. VACUUM PUMPS
LA-W925	REVISION 0	89609500	1028865	3	S	0.2082	226.8	G6	MERCURY, TRITIUM CONTAM. VACUUM PUMPS
LA-W925	REVISION 0	905762	1000223	53	S	0	10.9	MW6	PLAST-LND,LAB GLASSWARE W/MERCURY(RAD)
LA-W925	REVISION 0	908448	1017250	3	S	0.1136	140.6	G4	2X DIFF. PUMP W/ 1200CC HG/ >100CI/M3 3H
LA-W925	REVISION 0	908476	1035535	3	S	0.1136	158.8	G4	PIPING W/ HG, 100 CI/M3 3H
LA-W925	REVISION 0	908477	1000190	3	S	0.1136	140.6	G4	PIPING/BEAMLINE ELEMENTS W/ HG, 100M3 3H
LA-W925	REVISION 0	909152	1024037	21	S	0.1136	108.9	MW6	MERCURY WASTE
LA-W925	REVISION 0	91001492	1026263	50	S	0.2082	90.7	MW6	DEBRIS W/ MERCURY
LA-W925	REVISION 0	91005296	1014418	50	S	0.2082	27.2	MW6	MERCURY SOLID WASTE
LA-W925	REVISION 0	91005297	1026505	50	S	0.2082	27.2	MW6	MERCURY SOLID WASTE
LA-W925	REVISION 0	91005300	1026522	50	S	0.1136	18.1	MW6	MERCURY SOLID WASTE

LA-W925	REVISION 0	91006835	1013610	48	S	0.047	2.3	MW6	DIFFUSION PUMPS W/MERCURY
LA-W925	REVISION 0	C91021437	1883	50	S	0.053	9.1	MW6	WASTE MERCURY
LA-W925	REVISION 0	C91024965	3441	50	L	0.0005	4.5	MW6	HG F/PU PLATTING
LA-W925	REVISION 0	C92025886	8307	46	S	0.1893	45.4	MW6	HG DIFFUSION PUMP,SCRAP METAL W/F2,U235,HG
LA-W925	REVISION 0	C92026046	8580	3	S	0.2082	45.4	MW6	HG & CLOTHING W/HG/D38
LA-W925	REVISION 0	C92026520	9276	50	S	0.1136	22.7	MW6	MERCURY WASTE, SOLID
LA-W925	REVISION 0	C92026522	9294	50	S	0.1136	22.7	MW6	MERCURY WASTE, SOLID
LA-W925	REVISION 0	C92026523	9279	50	S	0.0189	6.8	MW6	MERCURY WASTE, SOLID
LA-W925	REVISION 0	C92026523	9295	50	S	0.0189	6.8	MW6	MERCURY WASTE, SOLID
LA-W925	REVISION 0	C93037017	27333	3	S	0.0057	5.4	MW6	EMPTY MERCURY FLASK
LA-W925	REVISION 0	C93037584	25727	21	S	0.0009	0.9	MW6	MERCURY CONTAMINATED PLASTIC, RUBBER
LA-W925	REVISION 0	C93038701	27589	50	S	0.0019	0.5	MW6	THERMOMETER BROKEN IN FRIDGE; MERCURY SPILL KIT USED TO CLEAN UP AREAS
LA-W925	REVISION 0	C94042327	37950	50	S	0.0019	0.5	MW6	THERMOMETER BORKEN IN REFRIDGERATOR,MERCURY SPILL KIT USED TO CLEAN AREA
LA-W925	REVISION 0	C94044046	44610	54	S	0.0019	0.5	MW6	BROKEN THERMOMETER; MERCURY SPILL KIT CONTENTS/MERCURY/GLASS, ETC., IN LARGE BAG
						3.0619			
LA-W925	REVISION 4.0	86027200	1035796	41	S	0.0568	68	G6	HG CONTAM. EQUIP. DRUM#S 525

LA-W925	REVISION 4.0	900838	1018066	55	S	0	0.2	MW2	MERCURIC NITRATE
LA-W925	REVISION 4.0	905883	1020962	3		0.053	136.1	MW6	HG-TL AMALGAM 4-1GAL
LA-W925	REVISION 4.0	907007	1025477	50	S	0.114	108.9	MW3	MERCURY WASTE
LA-W925	REVISION 4.0	909522	1035421	3	S	0.0001	0.2	G6	MERCURIC CHLORIDE
LA-W925	REVISION 4.0	91001180	1025481	21	S	0.0001	0	G6	MERCURIC IODIDE
LA-W925	REVISION 4.0	91001181	1021958	21	L	0.0015	1.5	MW6	MERCURIC CHLORIDE SOLUTION
LA-W925	REVISION 4.0	91003746	1014288	3	S	0	0.1	MW6	MERCURIC IODIDE RED MERICK
LA-W925	REVISION 4.0	91003746	1023656	3	S	0.0001	0.5	MW6	MERCUROUS CHLORIDE
LA-W925	REVISION 4.0	91003746	1023667	3	S	0.0001	0.5	MW6	MERCURIC CHLORIDE
LA-W925	REVISION 4.0	91003746	1023668	3	S	0.0001	0.5	MW6	MERCURIC CHLORIDE
LA-W925	REVISION 4.0	91003746	1023670	3	S	0.0001	0.5	MW6	MERCURIC CYANIDE
LA-W925	REVISION 4.0	91003746	1023693	3	S	0.0001	0.5	MW6	MERCUROUS CHLORIDE
LA-W925	REVISION 4.0	91003746	1025001	3	S	0	0	MW6	MERCUROUS PHOSPHATE
LA-W925	REVISION 4.0	91003746	1025002	3	S	0	0.1	MW6	MERCURIC CHLORIDE
LA-W925	REVISION 4.0	91003746	1025003	3	S	0.0001	0.5	MW6	MERCURIC CHLORIDE
LA-W925	REVISION 4.0	91003746	1025046	3	S	0.0001	0.5	MW6	MERCURIC CHLORIDE

LA-W925	REVISION 4.0	91007738	1038407	41	S	0.0568	68	G6	HG CONTAMINATED EQUIPMENT
LA-W925	REVISION 4.0	91007739	1035760	41	S	0.0568	68	G6	HG CONTAMINATED EQUIPMENT
LA-W925	REVISION 4.0	C91023221	4517	48	S	0.0566	9.1	G6	DRYING OVEN W/HG
LA-W925	REVISION 4.0	C92027629	10808	3	S	0.0001	0.5	MW2	MERCUROUS NITRATE
LA-W925	REVISION 4.0	C92027646	11076	3	S	0	0.1	G4	SODIUM AMALGAM
LA-W925	REVISION 4.0	C92028063	11880	21	S	0.0002	0.2	MW6	MERCURIC ACETATE
LA-W925	REVISION 4.0	C92028063	11881	21	S	0.0001	0.1	MW6	MERCURIC FLUORIDE
LA-W925	REVISION 5.0	C94045692	47612	50	S	0.0001	0.2	G6	ABSORBED MERCURY
LA-W925	REVISION 5.0	C94046029	47999	3	S	0.1136	26	G6	BROKEN FLUORESCENT LAMPS CONT. W/MERCURY (WASTE INCL. GLOVES, KIMWIPES ETC.)
LA-W925	REVISION 5.0	C94046030	48000	3	S	0.1136	26	G6	BROKEN FLUORESCENT LAMPS CONT. W/MERCURY (WASTE INCL. GLOVES, KIMWIPES ETC.)
LA-W925	REVISION 5.0	C94046031	48001	3	S	0.1136	26	G6	BROKEN FLUORESCENT LAMPS CONT. W/MERCURY (WASTE INCL. GLOVES, KIMWIPES ETC.)
LA-W925	REVISION 5.0	C94046088	48176	50	L	0.0025	2.5	MW5	TOTAL KJELDAHL NITROGEN
LA-W925	REVISION 5.0	C94046088	48177	50	L	0.0025	2.5	MW5	TOTAL KJELDAHL NITROGEN
LA-W925	REVISION 5.0	C94046088	48843	50	L	0.0025	2.5	MW5	TOTAL KJELDAHL NITROGEN
LA-W925	REVISION 5.0	C94046088	48844	50	L	0.0025	2.5	MW5	TOTAL KJELDAHL NITROGEN
LA-W925	REVISION 5.0	C95046690	2014999	53	L	0.0283	2.3	MW3	ELECTRICAL MERCURY SWITCHES

LA-W925	REVISION 5.0	C95046940	2000498	55	S	0.1136	27	G6	BROKEN FLUORESCENT LIGHT BULBS
LA-W925	REVISION 5.0	C95049396	2011586	53	S	0.5664	64.4	G6	VOLUME CONTAMINATED MERCURY FLUORESCENT LAMPS (170 LAMPS IN 6 CARDBOARD BOXES PACKED INTO ONE CONTAINER) (EACH OF THE 6 BOXES HAVE ITEM #'S).
LA-W925	REVISION 5.0	C95050073	2015600	21	S	0.2266	18.1	G6	FLUORESCENT BULBS (RADIOACTIVE)
LA-W925	REVISION 5.0	C95050073	2015601	21	S	0.2266	18.1	G6	FLUORESCENT BULBS (RADIOACTIVE)
LA-W925	REVISION 6.0	C95056436	2020920	3	S	0.0566	11.3	G6	BROKEN FLUORESCENT LAMPS, RAGS, GLOVES, PLASTIC, PPE.
LA-W925	REVISION 6.0	C95056586	2022572	21	S	0.0038	1.4	MW6	WASTE FROM MERCURY SPILL
LA-W925	REVISION 6.0	C95057223	2021225	21	L	0.0001	4.5	MW6	MERCURY IN PLASTIC BOTTLE
LA-W925	REVISION 6.0	C95057223	2021226	21	L	0.0002	6.8	MW6	MERCURY IN JAR
LA-W925	REVISION 6.0	C95057223	2021227	21	L	0	0.2	MW6	GLASS TUBING WITH MERCURY
LA-W925	REVISION 6.0	C95057223	2021228	21	L	0	0.2	MW6	GLASS TUBING WITH MERCURY
LA-W925	REVISION 6.0	C95057223	2021229	21	L	0	0.2	MW6	MERCURY THERMOMETER
LA-W925	REVISION 6.0	C95057223	2021230	21	L	0	0.2	MW6	MERCURY THERMOMETER
LA-W925	REVISION 6.0	C95057223	2021231	21	L	0	0.3	MW6	MERCURY THERMOMETER
LA-W925	REVISION 6.0	C95057223	2021232	21	L	0	0.2	MW6	MERCURY THERMOMETER
LA-W925	REVISION 6.0	C95057257	2019885	3	S	0.0019	1.1	G6	BROKEN FLUORESENT LAMPS
LA-W925	REVISION 6.0	C95059017	2022507	21	L	0	0.2	G6	SODIUM - MERCURY AMALGAM POSSIBLE U-238 CONTAMINATION

LA-W925	REVISION 6.0	C95060739	2017723	3	S	0.2082	45.4	G6	BROKEN FLUORESCENT LAMPS RADLAMP2
LA-W925	REVISION 6.0	C96061851	2038180	53	S	0.0566	1.8	G6	MIXED WASTE SOLIDS - GLOVES, WIPES, EMPTY CONTAINERS
LA-W925	REVISION 6.0	C96065568	2043247	3	S	0.0035	0	MW6	WASTE FROM SAMPLING PROCESS (PIPETTE, GLOVES, KIMWIPES, PLASTIC CONTAMINATED WITH MERCURY)
LA-W925	REVISION 6.0	C96065591	2043756	33	S	0.0566	3.9	MW3	MERCURY RECTIFIER TUBES
LA-W925	REVISION 6.0	C96065594	2043754	33	S	0.0283	2.3	G6	MERCURY LAMPS & BATTERIES
LA-W925	REVISION 6.0	C96067427	2047305	3	S	0.0946	20.4	G6	BROKEN FLUORESCENT LAMPS W/PLASTIC
LA-W925	REVISION 6.0	C96067562	2027604	21	L	0.085	18	G6	WASTE HG CONTAMINATED (RAD) IN LABORATORY GLASSWARE COLUMNS
LA-W925	REVISION 6.0	C96070299	2026653	21	S	0.053	1.4	G6	BROKEN FLUORESCENT LAMPS GENERATED IN AN RMMA. TRASH CONSISTS OF PLASTIC, GLASS AND METAL
LA-W925	REVISION 6.0	C96070746	2058396	29	L	0.0009	0.5	G6	CLEANUP FROM MERCURY SPILL
LA-W925	REVISION 6.0	C96070835	2039486	21	S	0.0189	1.8	G6	MERCURY CONTAMINATED TOWELS...
LA-W925	REVISION 6.0	C96072238	2040912	55	S	0.006	2.3	G6	SLIP TOP CAN TIN, SS CYLINDERS CONTAMINATED WITH MERCURY
LA-W925	Proposed Revision 10	C97097665	2083701	21	S	0	0	MW6	MERCURIC IODIDE
LA-W925	Proposed Revision 10	C97099591	2087239	21	S	0.0001	0.1	MW6	MERCURY ABSORBED ON MERCURISORB
LA-W925	Proposed Revision 10	C97099591	2088295	21	S	0.0114	0.5	MW6	MERCURY CONTAMINATED GLASSWATE (WRAPPED IN PLASTIC)
						2.5949			