

LANL FFCO 06
State of New Mexico
ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 28, 2006

Mr. Albert Dye
Site Treatment Plan Project Manager
Los Alamos National Laboratory
P. O. Box 1663, MS K490
Los Alamos, NM 87545

Mr. James G. Nunz
Waste Management Program Manager
Department of Energy, Los Alamos Site Office
528 35th Street, MS A316
Los Alamos, New Mexico 87544

**RE: AMENDMENT TO SITE TREATMENT PLAN (STP) ON THE LOS ALAMOS
NATIONAL LABORATORY FEDERAL FACILITY COMPLIANCE ORDER
Los Alamos National Laboratory NM0890010515**

Dear Messrs. Dye and Nunz:

The purpose of this letter is to amend the Department of Energy and the University of California (Permittees) Site Treatment Plan (STP) annual revisions and related correspondence as required by the October 4, 1995 Federal Facility Compliance Order (FFCO). These amendments are made in accordance with FFCO Section XI. Other Amendments to the STP paragraph B. 1. These amendments should apply to Revision 16.0 for fiscal year 2005 and subsequent revisions.

On April 11, 2005, Ms. Lee Winn, the New Mexico Environment Department FFCO Project Manager and Mr. Albert Dye the Permittees' STP Project Manager met to discuss the STP annual update Revision 15.0 for fiscal year 2004. Based on discussions at that meeting it was decided that there are some format changes to subsequent revisions and related correspondence that would allow for more efficient review. The newly required correspondence and amendments are listed below:



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Correspondence to NMED:

1. On any correspondence related to a volume of waste shipped and returned to Permittees, whether it be a correction or return from assay, Permittees shall reference previous manifest number(s) and date(s) of previous related correspondence to NMED.
2. Any correspondence related to mixed transuranic (MTRU) waste shall include the treatability group category in the subject line and text of the letter.
3. On all correspondence where waste volumes are listed, Permittees shall include four significant digits after the decimal when possible.
4. All administrative adjustments shall be documented with correspondence to NMED prior to submission of the annual revision.
5. In reporting any notice of FFCO activity to NMED that includes manifests, Permittees shall clearly identify FFCO waste on the manifest. Permittees should include container numbers and pounds or kilograms converted into cubic meters in the transmittal letter to the submitted manifest. On the manifest itself LANL should include a separate line(s) and designate STP LLMW when shipping other than FFCO waste on a manifest.

STP Format Changes:

1. Some letters are sent to NMED that are not dated within the fiscal year but are covered in the previous fiscal year's annual revision. This usually happens because the cutoff date for the revision is the date of actual shipment to an offsite treatment, storage or disposal facility (TSDF), not the date of notification to NMED. For clarification, NMED requires the Permittees to include a table in the STP listing each letter to NMED in chronological order that is related to the submitted annual revision.
2. Historically waste volumes have been recorded to two significant digits in the STP. This is misleading for example when volumes are shown as 0.0 and in reality may be 0.001. NMED requires an amendment to the STP requiring reporting waste volumes to four significant digits after the decimal when possible.
3. As discussed in a telephone conversation between Albert Dye and Lee Winn on May 9, 2005, the FFCO requires the Permittees to revise milestone dates when necessary. The FFCO section X. Revisions, paragraph B.3. requires a revision to the Compliance Plan Volume when there is "Any change to a compliance date of more than (90) days." Therefore, Permittees must propose a compliance plan volume milestone date for a treatability group where the milestone date has been exceeded for more than 90 days.

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This requirement is also in accordance with FFCO section VII. Annual Site Treatment Plan Updates paragraph B. *Compliance Plan Volume*.

4. For covered MTRU waste (e.g. Table 2.2-2. FY04 Estimated Covered MTRU Inventory by Treatability Group), in addition to the treatability group, Permittees shall amend the table to provide the TRU Waste Baseline Inventory Report Identification Numbers and volume changes during the annual update. In addition to Table 2.2-2 heading categories, Permittees shall revise Table 2.2-2 to include the prior year's covered volumes, proposed revisions, and any relevant comments similar to Table 2.1-2: MLLW Inventory Detailed Update by Treatability. With this format change NMED will be able to more readily verify the progress made in removing the legacy MTRU waste from LANL.

Thank you for your attention to this matter. Please contact me at (505) 428-2541 or lee.winn@state.nm.us if you have any questions regarding this letter.

Sincerely,



Lee Winn
STP Project Manager
Hazardous Waste Bureau

cc: J. Bearzi, NMED HWB
J. Kieling, NMED HWB
D. Cobrain, NMED HWB
L. Winn, NMED HWB
L. King, EPA 6PD-N
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File: Reading and FFCO 2006