

FFCO

RECEIVED

JAN 29 2008



Environmental Protection Division
Water Quality & RCRA (ENV-RCRA)
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: January 23, 2008
Refer To: ENV-RCRA-08-009

Ms. Rebecca Kay
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Ms. Kay:

SUBJECT: RESPONSE TO THE NMED NOVEMBER 16, 2007 ADDENDUM TO THE OCTOBER 5, 2007 NOTICE OF DISAPPROVAL OF THE LANL FY06 STP, REVISION 17

In a November 16, 2007 letter from James Bearzi, Bureau Chief of the New Mexico Environment Department (NMED), the Los Alamos National Laboratory (LANL) was notified of additional deficiencies in the March 13, 2007 Fiscal Year 2006 (FY06) Site Treatment Plan (STP) annual update. The purpose of this letter is to respond to each of the additional deficiencies. For ease of reference, the NMED's comment is included with each response.

NMED Comment 1:

A November 27, 2006 letter entitled "Request for Expedited Treatment, Site Treatment Plan, LANL", for waste group LA-W924 (Lead Wastes), indicates that a volume of 0.2271m³ was shipped to Energy Solutions in Utah. NMED never received a "Notice for Completion of Off-Site Waste Shipment Activity 3.2 in the CPV, STP, LANL." Attachment D of the CPV (page 27) states that [the Respondents] must "provide documentation to NMED that waste was received at off-site facility...within 45 days of receipt or within 45 days of parallel option." Table 2.1-2 in the STP Update (page 4) does not reflect this expedited shipment amount of 0.2271m³ nor does the table included in Attachment D of the CPV (page 26).

The Respondents must add documentation in Attachment B, Section 2.0 explaining the discrepancy and reporting the actual volumes shipped, and provide supporting documentation that the off-site facility received the waste. In the future, when the Respondent's request an "expedited treatment" of a waste treatability group, a notice of completion of off-site waste shipment activities must be submitted to NMED within the 45 day allotted time period indicated in the Compliance Plan Volume. All total volumes must be accurately reported throughout the STP and the CPV.



LANL Response

The Federal Facility Compliance Order (FFCO) requires LANL to bring the Site Treatment Plan current to end of the previous fiscal year. The November 27, 2006 request for expedited shipment letter occurred in fiscal year 2007. Therefore no discrepancy exists in the FY06 STP annual update and that shipment will be addressed in the FY07 STP annual update. Second, NMED states that NMED never received a Notice of Completion of Offsite Waste Shipment for the waste in question. Attached is a copy of a letter dated January 19, 2007 and copy of the signed return receipt card showing the NMED Hazardous Waste Bureau received the letter on January 31, 2007.

NMED Comment 2:

An October 4, 2006 letter entitled "Request for Expedited Treatment, Site Treatment Plan, LANL", for waste group LA-W910 (PCB wastes with RCRA components), indicates that a volume of 1.2864m³ was shipped to M&EC in Oak Ridge, TN. NMED never received a "Notice for Completion of Off-Site Waste Shipment Activity 3.1.11 in the CPV, STP, LANL." Attachment D of the CPV (page 23) states that [the Respondents] must "provide documentation to NMED that waste was received at off-site facility...within 45 days of receipt or within 45 days of parallel option." Moreover, Table 2.1-2 in the STP Update (page 4) does not reflect this expedited shipment amount of 1.2864m³ nor does the table included in Attachment D of the CPV (page 22).

The Respondents must add documentation in Attachment B, Section 2.0 explaining the discrepancy, reporting the actual volumes shipped, and provide supporting documentation that the off-site facility received the waste. In the future, when the Respondent's request an "expedited treatment" of a waste treatability group, a notice of completion of off-site waste shipment activities must be submitted to NMED within the 45 day allotted time period indicated in the Compliance Plan Volume. All total volumes must be accurately reported throughout the STP and the CPV.

LANL Response

Comment 2 apparently references an October 6, 2005 notice of expedited shipment letter proposing the shipment of 1.2864 m³ of LA-W910 waste. The discrepancy between the proposed expedited shipment of 1.2864 m³ of waste and the notice of completion reported volume of 0.6322 m³ was addressed in the LANL response letter to NMED dated November 13, 2007 as follows: "In the STP, LANL tracks covered mixed low-level waste by item volume rather than by container volume. The October 4, 2005 letter inadvertently used a gross container volume of 1.2864 m³ rather than the net volume (i.e., the volume of the items within the containers). The 0.6322 m³ was the correct volume and a revision to Section 2.0 of the Compliance Plan Volume includes an explanation of the discrepancy."

NMED Comment 3:

An April 20, 2006 letter entitled "Request for Expedited Treatment, Site Treatment Plan, LANL", for waste group LA-W933 (Labpacks), indicates that a volume of 0.0946m³ was shipped to Waste Control Specialists in Andrews County, TX. NMED never received a "Notice for Completion of Off-Site Waste Shipment Activity 3.2 in the CPV, STP, LANL." Attachment D of the CPV (page 27) states that [the Respondents] must "provide documentation to NMED that waste was received at off-site facility...within 45 days of receipt or within 45 days of parallel option." Table 2.1-2 in the STP Update (page 4) does not reflect this expedited shipment amount of 0.0946m³ nor does the table included in Attachment D of the CPV (page 26).

The Respondents must add documentation in Attachment B, Section 2.0 explaining the discrepancy, reporting the actual volumes shipped, and provide supporting documentation that the off-site facility received the waste. In the future, when the Respondent's request an "expedited treatment" of a waste treatability group, a notice of completion of off-site waste shipment activities must be submitted to NMED within the 45 day allotted time period indicated in the Compliance Plan Volume. All total volumes must be accurately reported throughout the STP and the CPV.

LANL Response

LANL sent to NMED two "Requests for Expedited Treatment" letters for 0.0946m³ of LA-W933 (Labpacks) waste: the April 20, 2006 letter referenced above and a second letter dated May 12, 2006. The May 12, 2006 letter explained that the proposed shipment to Waste Control Specialists was cancelled due to programmatic problems. The May 12, 2006 letter then proposed to send the waste to PermaFix in Florida. Documentation of the LA-W933 (Labpacks) waste receipt at PermaFix was provided to NMED in a letter dated June 28, 2006.

NMED Comment 4:

A June 13, 2006 letter entitled "Notice of Completion of Off-Site Waste Shipment Activities in the CPV, STP, LANL" for waste group LA-W909 (Bulk Oils), indicates that a volume of 0.3180m³ was shipped to PermaFix in Florida. However, the manifest that accompanies the letter in fact indicates that M&EC/PermaFix, Inc. in Oak Ridge, Tennessee received the shipment. In the future, the Respondents must accurately report the facility that received the waste shipment and its geographic location.

LANL Response

LANL will take measures to prevent this error from happening in the future.

NMED Comment 5:

A June 26, 2006 letter entitled "Notice of Completion of Off-Site Waste Shipment Activities in the CPV, STP, LANL" indicates that a volume of 0.0152m³ for waste group LA-W918 (Compressed gases requiring oxidation) and a volume of 0.4164m³ for waste group LA-W933 (Bulk Oils) were shipped on May 21, 2007 to either Gainesville, FL or Oakridge, TN. Table 2.1 2 (pp. 3-4) in the STP Update does not indicate that these volumes were generated (for waste group LA-W918) or shipped (for both waste groups). The Attachment D tables' totals in the CPV (pp.19 and 26) as well as the column "FY06 Annual Update" totals in the STP are not accurate because they do not reflect the shipped waste volumes as indicated in the notification letter.

The Respondents must add documentation in Attachment B, Section 2.0 explaining the discrepancy and reporting the actual volumes generated and shipped. The Respondents must revise the STP and the CPV to accurately report all total volumes.

LANL Response

The above referenced letter was dated June 26, 2007, rather than June 26, 2006. The waste volumes in question will be addressed in the next annual update, i.e., the FY07 STP update.

NMED Comment 6:

A March 15, 2006 letter entitled, "Notice of Completion of Milestone 3.1.3(D) in the CPV, STP, LANL" notified the Department that this particular milestone activity had been met by the CPV date

of October 1, 2005. Section XX of the FFCO requires written notification to the Department within ten days after meeting a milestone compliance date; the Respondents were five months late in sending this notification. The Respondents must provide a detailed explanation in Attachment B, Section 2.0 for why the letter was delinquent.

LANL Response

The notice was late due to an oversight. However, the Completion of Milestone referenced above was reported in the FY05 STP Compliance Plan Volume (CPV). Providing a detailed explanation in the FY06 STP of an event that occurred in the previous year and reported in the prior STP could be confusing and therefore would be inappropriate.

NMED Comment 7:

Attachment C, page 4, proposes four extensions of compliance dates for milestone activities (3.1.5(A), 3.1.8(A), 3.1.9(A), and 3.2(1)). In the future, the Respondents must submit an extension request letter if an extension request is anticipated no later than 60 days prior to the milestone activity compliance date. In order for the Department to consider such a request, the respondents must provide, at a minimum, the following information:

- 1. A description of the waste in the treatability group(s);*
- 2. A list of the EPA hazardous waste numbers associated with those wastes;*
- 3. A description of the treatment processes required for the treatability group(s);*
- 4. A full list of all the commercial facilities the Respondents contacted requesting treatment and acceptance of the treatability group(s); and*
- 5. All correspondence, formal or otherwise, between the commercial facilities, identified in item 4 above, including reasons for their denial of acceptance and treatment of the treatability group(s).*

In addition, two of the proposed extension requests are for treatability groups (LA-W918 and LA-W934) which the Respondents have indicated " ...there is no path forward at this time..." However, the Respondents have shipped waste in these treatability groups this past FY (See "Notice of Completion of Off-Site Waste Shipment Activities" letters dated June 26, 2007, June 28, 2007, and August 23, 2006). The Respondents must provide in Attachment B, Section 2.0 the rationale for why this extension is being requested for waste groups for which the Respondents have historically found shipping destinations.

LANL Response

Under Section X. "REVISIONS", the FFCO states "A revision is an amendment to the Compliance Plan Volume of the STP that is either required by NMED, or proposed by Respondents and approved by NMED..." and "Revisions may be proposed to NMED in the Annual Site Treatment Plan Update or at such other times which Respondents deem necessary." Revisions include "Any change to a compliance date of more than (90) days;" LANL proposed changes to compliance dates in the March 13, 2007 Fiscal Year 2006 (FY06) Site Treatment Plan (STP) annual update. LANL will continue propose extensions to milestones dates as provided in the FFCO in each annual STP update and will provide information to justify the extensions. Any proposed extensions will be called out in the STP transmittal letter. This should provide more than 60 days advanced notice to extend milestone deadlines. Should a milestone date be approached without NMED action on the STP,

LANL will send a second separate written request for extension of milestones at least 60 days prior to the milestone expiration date.

In response to the second issue in Comment 7, the FFCO provides a regulatory means to properly manage legacy mixed waste. At the time the FFCO was being drafted it was also anticipated LANL would require a provision to address the management of newly generated waste. Over the past several years LANL has made significant gains in reducing its inventory of legacy mixed low level waste. Much of the remaining legacy waste has few, if any, current viable treatment options. Many of the items are contaminated with tritium at concentrations that would cause the receiving treatment facilities to exceed permissible tritium stack limits. On-going operations at LANL have continued to generate waste. Comment 7 questions why LANL has shipped some waste items from treatability groups LA-W918 and LA-W934 yet continues to store other items from these same groups. The June 26, 2007 and June 28, 2006 letters (there was no letter dated June 28, 2007 as cited in Comment 7) were for shipments of small volume, commercially available aerosol cans, such as the product WD-40. These cans were generated in a TA-55 radiation control area and required radioactive assaying before they could be transferred to TA-54. Due to the low mass of the aerosol cans, obtaining accurate gamma assays proved to be very difficult. Once this was accomplished, the items were transferred to TA-54 and shipped off-site for treatment. The August 23, 2006 letter was for a container of LA-W934 high activity waste. Because of concerns about tritium contamination, the container required re-characterization at TA-54 for tritium. Radiation protection procedures required development and implementation of a plan to safely characterize the waste, which resulted in an extended storage period. Once it was determined the container met the off-site treatment facility's waste acceptance criterion for tritium, the waste was shipped. Thus, the shipments cited in Comment 7 were all for more recently generated waste and LANL was able to secure off-site treatment options and proceeded to ship the items. Nevertheless, some newly generated wastes may require extended periods of storage before suitable treatment options may be secured and thus future extensions of milestone dates may be required for both newly generated waste as well as the remaining legacy items.

Enclosed is copy of the letter referenced in LANL's response to NMED comment 1. LANL is submitting, in a separate letter, a response to the NMED request for a plan for improved tracking of STP covered mixed TRU waste.

Ms. Rebecca Kay
ENV-RCRA-08-009

- 6 -

January 23, 2008

Please contact me at (505) 667-4715 or by email at dyea@lanl.gov if you have any questions.

Sincerely,



Albert Dye
STP Project Manager
Water Quality & RCRA Group (ENV-RCRA)

AD/lm

Enclosures: a/s

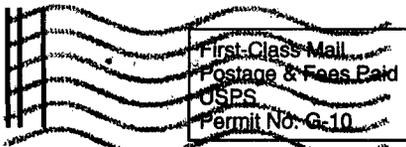
Cy: James Bearzi, NMED/HWB, Santa Fe, NM, w/enc.
Gene Turner, LASO/EO, w/o enc., A316
John D. Stewart, LASO/EO, w/o enc., A316
Michael B. Mallory, PADOPS, w/o enc., A102
Richard S. Watkins, ADESHQ, w/o enc., K491
Paul Newberry, WDP-HMWO, w/o enc., J595
Chris Duy, WDP-HMWO, w/o enc., J595
Ellen Louderbough, LC-LESH, w/o enc., A187
ENV-RCRA, File, w/enc., K490
IRM-RMMSO, w/enc., A150

ENCLOSURE 1

**COPY OF JANUARY 19, 2007 NOTICE OF COMPLETION OF OFFSITE
WASTE SHIPMENT**

ALBUQUERQUE NM 871
UNITED STATES POSTAL SERVICE

01 FEB 2007 PM 3



• Print your name, address, and ZIP Code in this box •

Louella B. Medina	
LANL MS	K490

P.O. Box 1663
Los Alamos, NM 87545



000

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: ms. Lee Winn Hazardous Waste Bureau nm Env. Dept 2905 Rodeo Park Dr. E. #1 Santa Fe nm 87505-6303		4a. Article Number 7004 1350 0002 8387 2589
5. Received By: (Print Name) Danielle Valdez		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature (Addressee or Agent) X Danielle Valdez		7. Date of Delivery 1-31-97
8. Addressee's Address (Only if requested and fee is paid)		

Thank you for using Return Receipt Service.



Environmental Protection Division
 Water Quality & RCRA (ENV-RCRA)
 P.O. Box 1663, Mail Stop K490
 Los Alamos, New Mexico 87545
 (505) 667-0666/FAX: (505) 667-5224

Date: January 19, 2007
 Refer To: ENV-RCRA: 07-013

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Lee Winn
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505-6303

**SUBJECT: NOTICE OF COMPLETION OF OFF-SITE WASTE SHIPMENT
 ACTIVITIES IN THE COMPLIANCE PLAN VOLUME (CPV), SITE
 TREATMENT PLAN (STP), LOS ALAMOS NATIONAL LABORATORY
 (LANL)**

Dear Ms. Winn:

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of completion of required activities set forth in the Federal Facility Compliance Order (FFCO). Activity 3.2 (K) in the CPV requires that "(w)ithin 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option" the Department of Energy (DOE) and the University of California (UC), "provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option."

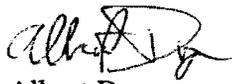
A shipment that included STP covered waste was initiated on December 18, 2006, and completed on December 19, 2006. The waste was sent to Energy Solutions in Utah. The volume of STP waste shipped is described in the following table:

3.2	LA-W934	Lead Wastes	60671	C06187186	0.0189
				C06187187	0.2082
Total STP Volume Shipped					0.2271

Documentation that waste was received at the aforementioned facility is provided in Enclosure A. Also included as Enclosure B is a Certification Statement prepared in accordance with the requirements of Section XX, "*Documents, Information, and Reporting Requirements*," of the FFCO.

Please contact Albert Dye at (505) 667-4715 or by email at dyea@lanl.gov if you have any questions.

Sincerely,



Albert Dye
STP Project Manager

AD:tag

Enclosures: a/s

Cy: J. Bearzi, NMED/HWB, Santa Fe, NM, w/enc.
G. Turner, NNSA/LASO, w/o enc., MS A316
R. V. Bynum, PADOPS, w/enc., MS A102
R. S. Watkins, ADESHQ, w/enc., MS K491
E. Louderbough, LC-LESH, w/o enc., MS A187
P. Newberry, WS-HMWO, w/o enc., MS J595
C. Duy, WS-HMWO, w/o enc., MS J595
A. Dye, ENV-RCRA, w/o enc., MS K490
ENV-RCRA, File, w/enc., MS K490
IRM-RMMSO, w/enc., MS A150

ENCLOSURE A

**DOCUMENTATION THAT WASTE WAS RECEIVED
AT OFF-SITE FACILITY
ACTIVITY 3.2(K)
SITE TREATMENT PLAN (STP)
LOS ALAMOS NATIONAL LABORATORY (LANL)**

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator ID Number MM0890010515	2 Page 1 of 2	3 Emergency Response Phone (505) 667-6211	4 Manifest Tracking Number 000363641 JJK		
5 Generator's Name and Mailing Address LANS, LLC for US DOE P.O. Box 1663, MS J595 Los Alamos, NM 87545 Generator's Phone: (505) 665-6158			Generator's Site Address (if different than mailing address) LANS, LLC for US DOE Mesita Del Buey Rd. TA-54 Los Alamos, NM 87545				
6 Transporter 1 Company Name M.P. ENVIRONMENTAL SERVICES, INC.				U.S. EPA ID Number CAT000624247			
7 Transporter 2 Company Name				U.S. EPA ID Number			
8 Designated Facility Name and Site Address Energy Solutions LLC Interstate 80, Exit 49 Clive, UT 84029 Facility's Phone: (435) 884-0155				U.S. EPA ID Number UTD982598898			
9a HM	9b U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10 Containers		11 Total Quantity	12 Unit W/LAB	13 Waste Codes	
		No	Type				
XQ	1 RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSILE-EXCEPTED, 7, UN3321, SOLID ELEMENTAL, AN241 PU238 PU239, 3.69e-03 TBq	1	CH	3362	K		
X	2 WASTE RADIOACTIVE MATERIAL, EXCEPTED PACKAGE-LIMITED QUANTITY OF MATERIAL, 7, UN2910, AN241, 8.58e-07 TBq	1	DN	9	X	D003	
X	3 WASTE RADIOACTIVE MATERIAL, EXCEPTED PACKAGE-LIMITED QUANTITY OF MATERIAL, 7, UN2910, FISSILE EXCEPTED, AN241 CS137 PU238 PU239 U235 U238, 6.36e-08 TBq	1	DN	2	X	D008	D011
X	4 WASTE RADIOACTIVE MATERIAL, EXCEPTED PACKAGE-LIMITED QUANTITY OF MATERIAL, 7, UN2910, FISSILE EXCEPTED, AN241 PU238 PU239 U235 U238, 4.77e-08 TBq	1	DN	5	X	D006	D008
14 Special Handling Instructions and Additional Information LINE 1 ERG#: 162; LINE 2 ERG#: 161; EXCLUSIVE USE SHIPMENT				HMTF #: 06120501 LINE 3 ERG#: 161;		MANIFEST: 60671 LINE 4 ERG#: 161;	
				9328-01-M09979			
15 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offen's Printed/Typed Name <i>Paul N. Neuhay</i>				Signature 		Month Day Year 12/18/06	
16 International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. <input type="checkbox"/> Date of receipt: _____ Date leaving U.S. _____							
17 Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <i>Richard E. Wamsley</i>				Signature 		Month Day Year 12/18/06	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18 Discrepancy							
18a Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b Alternate Facility (or Generator) Manifest Reference Number _____ U.S. EPA ID Number _____							
Facility's Phone _____							
18c Signature of Alternate Facility (or Generator)						Month Day Year	
19 Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H111		2.		3.		4.	
20 Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <i>Ryan Fotheringham</i>				Signature 		Month Day Year 12/19/06	

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21 Generator ID Number NM0890010515	22 Page 2	23 Manifest Tracking Number			
24 Generator's Name LANIS, LLC FOR US DOE P.O. Box 1663, MS J595 Los Alamos, NM 87545							
25 Transporter _____ Company Name				U.S. EPA ID Number			
26 Transporter _____ Company Name				U.S. EPA ID Number			
27a HM	27b US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28 Containers		29 Total Quantity	30 Unit (M, L, B)	31 Waste Codes	
		No	Type				
X	WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSIONABLE EXCEPTED, 7, UN3321, SOLID ELEMENTAL, AN241 PU238 PU239 U235 U238, 6.56e-07 TBq	1	DR	5	K	D008	
X	WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSIONABLE EXCEPTED, 7, UN3321, SOLID ELEMENTAL, AN241 CO60 CS137 PU238 PU239 U235 U238, 1.38e-04 TBq	1	DR	312	K	D006	D008
X	WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSIONABLE EXCEPTED, 7, UN3321, SOLID ELEMENTAL, AN241 PU238 PU239 U235 U238, 9.94e-06 TBq	1	DR	59	K	D008	
X	NON-REGULATED WASTE, SOLID, 7	1	CR	3362	K		
X	HAZARDOUS WASTE, SOLID, H.O.S., (CONTAINS CADMIUM, LEAD), 9, HA3077, III	1	DR	6	K	D006	D008
X	HAZARDOUS WASTE, SOLID, H.O.S., (CONTAINS LEAD, SILVER), 9, HA3077, III	1	DR	40	K	D008	D011
X	HAZARDOUS WASTE, SOLID, H.O.S., (CONTAINS LEAD), 9, HA3077, III	1	DR	239	K	D008	
X	HAZARDOUS WASTE, SOLID, H.O.S., (CONTAINS CADMIUM & LEAD), 9, HA3077, III	2	DF	48	K	D006	D008
X	HAZARDOUS WASTE, SOLID, H.O.S., (CONTAINS CADMIUM, LEAD), 9, HA3077, III	1	DF	28	K	D006	D008
32 Special Handling Instructions and Additional Information							
LINE 1 ERG#: 162;		LINE 2 ERG#: 162;		LINE 3 ERG#: 162;		LINE 4 ERG#: ;	
LINE 5 ERG#: 171;		LINE 6 ERG#: 171;		LINE 7 ERG#: 171;		LINE 8 ERG#: 171;	
LINE 9 ERG#: 171;							
33 Transporter Acknowledgment of Receipt of Materials							
Printed/Typed Name			Signature		Month Day Year		
34 Transporter Acknowledgment of Receipt of Materials							
Printed/Typed Name			Signature		Month Day Year		
35 Discrepancy							
36 Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
H11							

ENCLOSURE B

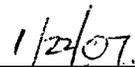
CERTIFICATION STATEMENT

**NOTICE OF COMPLETION OF OFF-SITE WASTE SHIPMENT
ACTIVITY 3.2(K)
SITE TREATMENT PLAN (STP)
LOS ALAMOS NATIONAL LABORATORY (LANL)**

I certify that I am the Project Manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



Albert Dye
STP Project Manager
Water Quality & RCRA
Los Alamos National Laboratory
Operator



Date Signed

EnergySolutions, LLC		5 SHIPPER -- NAME AND FACILITY DOE / LANL by Cavanagh Services Group PO Box 1663 MS J695 (Chris Day) Los Alamos, NM 87548		SHIPPER ID NUMBER NA <input type="checkbox"/> COLLECTOR <input type="checkbox"/> PROCESSOR		7 FORM 540 AND 540A PAGE 1 OF 2 PAGE(S) FORM 541 AND 541A 4 PAGE(S) FORM 542 AND 542A None PAGE(S) ADDITIONAL INFORMATION None PAGE(S)		8 MANIFEST NUMBER (Use this number on all continuation pages) 9328-01 60671 ESI Dec							
UNIFORMED RADIOACTIVE MANIFEST PAPER		Utah Generator Site Access Permit No 0501-803-157		SHIPMENT NUMBER 9328-01-0002		<input checked="" type="checkbox"/> GENERATOR TYPE (Specify) G		9 CONSIGNEE - Name and Facility EnergySolutions, LLC Clive Disposal Site (Treatment Facility) Interstate 80, Exit 49 Clive, UT 84029 M09979							
CONTACT Chris Day		CONTACT Chris Day		TELEPHONE NUMBER (Include Area Code) 505-667-6854		TELEPHONE NUMBER (Include Area Code) 505-667-6854		CONTACT Shipping and Receiving TELEPHONE (Include Area Code) (435)884-0155							
10 CERTIFICATION		6 CARRIER -- Name and Address M P Environmental Services, Inc 2530 S 18th Ave Phoenix, AZ 85007		EPA ID NUMBER CAT00624247		SIGNATURE - Authorized consignee acknowledging waste receipt <i>Myron Kurpius</i>		DATE 12/19/2006							
11 TOTAL NUMBER OF PACKAGES IDENTIFIED ON THIS MANIFEST 14		CONTACT MYRON KURPIUS		TELEPHONE (Include Area Code) (800)833-7802		This is to certify that the herein-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. This also certifies that the materials are classified, packaged, marked, and labeled and are in proper condition for transportation and disposal as described in accordance with the requirements of 10 CFR Parts 20 and 61 or equivalent state regulations.									
EPA MANIFEST NUMBER 60671		SIGNATURE - Authorized shipper acknowledging waste receipt <i>Myron Kurpius</i>		DATE 12-18-06		AUTHORIZED SIGNATURE <i>Myron Kurpius</i>		TITLE WSM							
12 DOT LABEL "RADIOACTIVE"		13 TRANSPORT INDEX		14 PHYSICAL AND CHEMICAL FORM		15 INDIVIDUAL RADIONUCLIDES		16 TOTAL PACKAGE ACTIVITY MBq mCi		17 LSA/SCO CLASS		18 TOTAL WEIGHT OR VOLUME (Use appropriate units)		19 IDENTIFICATION NUMBER OF PACKAGE	
Type, PGIII (Contains...)		NA		NA		Solid OXIDE		H-3		1 7760E+01 4 8000E-01		NA		60 0113 LBS, 1 8711 FT3 C06183880	
Type, PGIII (Contains...)		NA		NA		Solid OXIDE		H-3		4.0700E+01 1.1000E+00		NA		526 0990 LBS, 7 3507 FT3 C06184441	
Activity (LSA-II), D, CS137, PU238,		NA		NA		Solid Elemental		Am-241 Co-60 Cs-137 Pu-238 Pu-239 U-235 U-238		1 3811E+02 3 7328E+00		LSA-II		698 1290 LBS, 7 3507 FT3 C06184653	
Package-Limited 3 57512E-07 TBq		NA		NA		S OXIDE		Am-241		8 5751E-01 2 3176E-02		NA		70 LBS, 7 FT3 C06185182	
Package-Limited Accepted, AM241, U-238 TBq		NA		NA		S OXIDE		Am-241 Cs-137 U-235 U-238 Pu-238 Pu-239		6 3587E-02 1 7186E-03		NA		90 LBS, 11 FT3 C06185194	
Package-Limited Accepted, AM241, Bq		NA		NA		S OXIDE		Am-241 Pu-238 Pu-239 U-235		4.7668E-02 1 2883E-03		NA		60 LBS, 7 FT3 C06185787	
<input type="checkbox"/> Record Waste Description Inadequate <input type="checkbox"/> Contamination or Leakage Detected <input type="checkbox"/> Unexpected Exposure Rates Detected <input type="checkbox"/> Labels, Markings, etc Inadequate <input type="checkbox"/> Container Integrity Inadequate <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> No Violations Detected on this Shipment		20 TERMS AND CONDITIONS A HAZARDOUS MATERIALS Generator represents & warrants that Waste Material <input checked="" type="checkbox"/> is (or) <input type="checkbox"/> is not a hazardous waste as defined in 40 CFR 261. Where the material is a hazardous waste, this shipment is also accompanied by a separate and completed hazardous waste manifest, along with the appropriate land-disposal restriction notice and/or certification as required by 40 CFR 268.1 B TITLE Upon acceptance at the disposal site by EnergySolutions, LLC, and all appropriate regulatory authorities, title to the Waste Material which conforms to Generator's representations herein shall thereupon transfer from Generator and be vested in EnergySolutions, LLC C WASTE MATERIAL Generator represents and warrants that all data set forth in this (UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST) are true and correct in all respects and in accordance with all applicable governmental laws, rules, regulations and EnergySolutions, LLC's facility license D INDEMNIFICATION Generator agrees to indemnify EnergySolutions, LLC, its officers, employees and agents against all losses and liability whatsoever if such losses or liability results from the failure of the Waste Material to conform in all material respects to the data supplied on the (UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST), or if this shipment fails to meet the standards prescribed by the Department of Transportation or any governmental agency having jurisdiction over such matters													

EnergySolutions, LLC

EL RADIOACTIVE MANIFEST

WASTE DESCRIPTION

(NRC) Requirements for Control, Transfer and Disposal of Radioactive Waste

1 MANIFEST TOTALS

NUMBER OF PACKAGES/DISPOSAL CONTAINERS	NET WASTE VOLUME	NET WASTE WEIGHT	SPECIAL NUCLEAR MATERIAL (grams)			
			U-233	U-235	Pu	Total
14	mS 2 0515	kg 7471.5129	NP	2 9756E-01	3 6544E-02	3 3411E-01
	83 72 4472	ton 8 2360		5 Containers	6 Containers	
ACTIVITY						
	ALL NUCLIDES	TRITIUM	C-14	Tc-99	I-129	SOURCE (kg)
MBq	2 4548E+02	9 5460E+01	NP	NP	NP	(kg) 1 8310E+00
mCi	6 6266E+00	2 5800E+00	NP	NP	NP	(tons) 2 0183E-03

2 MANIFEST NUMBER
60671 ESI Dec

3 PAGE 1 OF 4 PAGE(S)

4 SHIPPER NAME
DOE / LANL

SHIPMENT ID NUMBER
NA

DISPOSAL CONTAINER DESCRIPTION

WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER

7 WASTE VOLUME (m3)	8 WASTE AND CONTAINER WEIGHT (kg)	9 SURFACE RADIATION LEVEL (mSv/hr)	10 SURFACE CONTAMINATION (MBq/100 cm2)		11 PHYSICAL DESCRIPTION			14 CHEMICAL DESCRIPTION	15 WEIGHT % CHELATING AGENT IF > 0.1%	15 RADIOLOGICAL DESCRIPTION				16 WASTE CLASSIFICATION
			ALPHA	BETA-GAMMA	11 WASTE DESCRIPTOR	12 APPROXIMATE WASTE VOLUME(S) IN CONTAINER (m3)	13 SOLIDIFICATION OR STABILIZATION MEDIA	CHEMICAL FORM/ CHELATING AGENT		INDIVIDUAL RADIONUCLIDES AND ACTIVITY (MBq) AND CONTAINER TOTAL, OR CONTAINER TOTAL ACTIVITY AND RADIONUCLIDE PERCENT				
0 0530	27.2207	<2 8000E-03	<3 3400E-07	<1 8700E-08	28-4J	0 0530	100	OXIDE/NP	NP	H-3	1 76338E+04	1.7760E+01	4.8000E-01	AU
1 8711	8 0300	<2 0000E-01	<2 0000E+01	<1 0000E+02		1 8711				Subtotal		1 7760E+01	4.8000E-01	
										Total		1 7760E+01	4 8000E-01	
0.2881	238 6345	<2 0000E-03	<3 3400E-07	<1 8700E-08	28-4J	0 0857	100	OXIDE/NP	NP	H-3	4.60958E+03	4 0700E+01	1 1000E+00	AU
7 3307	0 2638	<2 0000E-01	<2 0000E+01	<1 0000E+02		0.2881				Subtotal		4.0700E+01	1.1000E+00	
										Total		4.0700E+01	1.1000E+00	
0 2081	311 2228	<2 0000E-03	<3 3400E-07	<1 8700E-08	28-4J	0 1882	100	Elemental/NP	NP	Am-241	1 99858E+03	2 3014E+01	6 2200E-01	AU
7.3587	0.3431	<2 0000E-01	<2 0000E+01	<1 0000E+02		6 8824				Co-60	1 99858E+03	2 3014E+01	6 2200E-01	
										Cs-137	1 99858E+03	2 3014E+01	6 2200E-01	
										Pu-238 [3 6588E-05 g]	1 99858E+03	2 3014E+01	6 2200E-01	
										Pu-239 [1 0032E-02 g]	1 99858E+03	2 3014E+01	6 2200E-01	
										U-235 [2 8273E-01 g]	1.99858E+00	2 3014E-02	6 2200E-04	
										U-238 [1 8294E+00 kg]	1.99858E+03	2.3014E+01	6 2200E-01	
										Subtotal		1 3811E+02	3 7326E+00	
										Total		1 3811E+02	3 7326E+00	
										SNM [2 9280E-01 g]				
										Source [1 8294E+00 kg]				
0 1982	31 7518	<2 0000E-03	<3 3400E-07	<1 8700E-08	28-4J	0 0188	100	OXIDE/NP	NP	Am-241	2 59315E+03	8 5751E-01	2 3176E-02	AU
7 0080	0 0350	<2 0000E-01	<2 0000E+01	<1 0000E+02		0 7838				Subtotal		8.5751E-01	2 3176E-02	
										Total		8.5751E-01	2 3176E-02	

Note 1A. Bulk Packaging Description Codes (Choose one code as may be applicable)

A Gondola
 B Intermodal
 C End Dump
 D Roll-off
 E Seawen

NOTE 2 Waste Descriptor Codes (Choose up to three which predominate by volume)

20 Charcoal	29 Demolition Rubble	38 Evaporator Bottoms/Sludges/ Concentrates
21 Incinerator Ash	30 Cation Ion-exchange Media	39 Compactible Trash
22 Soil	31 Anion Ion-exchange Media	40 Noncompactible Trash
23 Gas	32 Mixed Bed Ion-exchange Media	41 Animal Carcass
24 Oil	33 Contaminated Equipment	42 Biological Material (except animal carcass)
25 Aqueous Liquid	34 Organic Liquid (except oil)	43 Activated Material
26 Filter Media	35 Glassware or Labware	59 Other Describe in Item 11 or additional page
27 Mechanical Filter	36 Sealed Source/Device	
28 EPA or State Hazardous	37 Paint or Plating	

NOTE 2A Specific Waste Descriptions (Choose all applicable codes)

G Dewatered
 H Solid
 I Combustible
 J Non-combustible
 K Air Filtration Filters
 L Asbestos

Note 3 Solidification and Stabilization Media Codes (Choose up to three which predominate by volume) For media meeting disposal site structural stability requirements, the numerical code must be followed by "S" and the media vendor and brand name must also be identified

In Item 13 Code 100-NONE REQUIRED

Solidification
 80 Cement 94 Vinyl Ester Styrene
 91 Concrete 99 Other Describe (encapsulation) in Item 13, or additional page
 92 Bitumen
 93 Vinyl Chloride 100 None Required

**UNIFORM LOW-LEVEL RADIOACTIVE
WASTE MANIFEST**

EnergySolutions, LLC

2 MANIFEST NUMBER
60671 ESI Dec

CONTAINER AND WASTE DESCRIPTION (CONTINUATION)

3 PAGE 2 OF 4 PAGE(S)

SAL CONTAINER DESCRIPTION					WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER					16 WASTE CLASSIFICATION AS-Class A Stable AU-Class A Unstable B-Class B C-Class C				
VOLUME (m3) (ft3)	WASTE AND CONTAINER WEIGHT (kg) (ton)	SURFACE RADIATION LEVEL (mSv/hr) (mrem/hr)	SURFACE CONTAMINATION (MBq/100 cm2) (dpm/100cm2)		PHYSICAL DESCRIPTION			CHEMICAL DESCRIPTION			RADIOLOGICAL DESCRIPTION			
			ALPHA	BETA-GAMMA	11 WASTE DESCRIPTOR (See Note 2 & Note 2A)	12 APPROXIMATE WASTE VOLUME(S) IN CONTAINER (m3) (FT3)	13 SOLIDIFICATION OR STABILIZATION MEDIA (See Note 3)	14 CHEMICAL FORM/ CHELATING AGENT	WEIGHT % CHELATING AGENT IF > 0.1%		INDIVIDUAL RADIONUCLIDES AND ACTIVITY (MBq) AND CONTAINER TOTAL OR CONTAINER TOTAL ACTIVITY AND RADIONUCLIDE PERCENT			
									RADIONUCLIDES					
										pCi/gm	MBq	mCi		
0 3115	40 8233	<2 0000E-03	<3 3400E-07	<1 6700E-06	28-HJ	0 0076	100	OXIDE/MP	NP	Am-241	2 48144E+01	1 0820E-03	2 9243E-05	AU
										Cs-137	1 92764E+00	8 4730E-05	2 2900E-06	
11 0000	0 0450	<2 0000E-01	<2 0000E+01	<1 0000E+02		0.2673				Pu-238 [6 5882E-08 g]	9 42727E+02	4 1440E-02	1 1200E-03	
										Pu-239 [9.1129E-06 g]	4 75572E+02	2 0905E-02	5 6500E-04	
										U-235 [2.2000E-04 g]	4 07393E-01	1 7908E-05	4 8400E-07	
										U-238 [4 5588E-06 kg]	1 30467E+00	5 7350E-05	1 5500E-06	
										Subtotal		6 3587E-02	1 7186E-03	
										Total		6 3587E-02	1 7186E-03	
										SNM [2 2918E-04 g]				
										Source [4.5588E-06 kg]				
0 1982	27.2155	<2 0000E-03	<3 3400E-07	<1 6700E-06	28-HJ	0 0081	100	OXIDE/MP	NP	Am-241	3 58723E-02	6 5860E-06	1 7800E-07	AU
										Pu-238 [3 2941E-08 g]	1 12857E+02	2 0720E-02	5 6000E-04	
7 9009	0 0900	<2 0000E-01	<2 0000E+01	<1 0000E+02		0.2899				Pu-239 [1 1387E-05 g]	1 42280E+02	2 6122E-02	7 0600E-04	
										U-235 [9.7213E-03 g]	4 31012E+00	7 9132E-04	2 1387E-06	
										U-238 [2 2853E-06 kg]	1 56589E-01	2 8749E-05	7 7700E-07	
										Subtotal		4 7669E-02	1 2883E-03	
										Total		4 7669E-02	1 2883E-03	
										SNM [9 7327E-03 g]				
										Source [2 2853E-06 kg]				
0 2881	39 8183	<2 0000E-03	<3 3400E-07	<1 6700E-06	28-HJ	0 1135	100	OXIDE/MP	NP	Ba-7	8 45805E+00	1 2210E-02	3 3000E-04	AU
										Mn-54	4 86979E-01	7 0300E-04	1 9000E-06	
7 3507	0 0430	<2 0000E-01	<2 0000E+01	<1 0000E+02		4 0695				Na-22	8 89377E-01	1 2839E-03	3 4700E-05	
										Nb-95	8 22738E-01	1 1877E-03	3 2100E-05	
										Os-185	3 20381E+00	4 6250E-03	1 2500E-04	
										Subtotal		2 0010E-02	5 4080E-04	
										Total		2 0010E-02	5 4080E-04	
0 0530	22 0038	<2 0000E-03	<3 3400E-07	<1 6700E-06	28-HJ	0 0530	100	OXIDE/MP	NP	H-3	2 27235E+04	1 8500E+01	5 0000E-01	AU
										Subtotal		1 8500E+01	5 0000E-01	
1 8711	0 0243	<2 0000E-01	<2 0000E+01	<1 0000E+02		1 8711				Total		1 8500E+01	5 0000E-01	
0 0530	26 0045	<2 0000E-03	<3 3400E-07	<1 6700E-06	28-HJ	0 0530	100	OXIDE/MP	NP	H-3	1 92276E+04	1 8500E+01	5 0000E-01	AU
										Subtotal		1 8500E+01	5 0000E-01	
1 8711	0 0287	<2 0000E-01	<2 0000E+01	<1 0000E+02		1 8711				Total		1 8500E+01	5 0000E-01	

UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST

EnergySolutions, LLC

2 MANIFEST NUMBER

60671 ESI Dec

CONTAINER AND WASTE DESCRIPTION (CONTINUATION)

3 PAGE 3 OF 4 PAGE(S)

1. CONTAINER DESCRIPTION					2. WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER										16. WASTE CLASSIFICATION AS-Class A Stable AU-Class A Unstable B-Class B C-Class C		
LUME (m3) (ft3)	8. WASTE AND CONTAINER WEIGHT (kg) (ton)	9. SURFACE RADIATION LEVEL (mSv/hr) (mrem/hr)	10. SURFACE CONTAMINATION (MBq/100 cm2) (dpm/100cm2)		11. PHYSICAL DESCRIPTION			14. CHEMICAL DESCRIPTION		15. RADIOLOGICAL DESCRIPTION							
			ALPHA	BETA-GAMMA	11. WASTE DESCRIPTOR (See Note 2 & Note 2A)	12. APPROXIMATE WASTE VOLUME(S) IN CONTAINER (m3) (FT3)	13. SOLIDIFICATION OR STABILIZATION MEDIA (See Note 3)	14. CHEMICAL FORM/ CHELATING AGENT	WEIGHT % CHELATING AGENT IF > 0.1%	INDIVIDUAL RADIONUCLIDES AND ACTIVITY (MBq) AND CONTAINER TOTAL, OR CONTAINER TOTAL ACTIVITY AND RADIONUCLIDE PERCENT							
					RADIONUCLIDES				pCi/gm	MBq	mCi						
0.1135	5.4442	< 0.000E-03	< 3.3400E-07	< 1.6700E-06	28-HJ	0.0188	100	OXIDE/NP	NP	Co-58 Co-60 Cs-134 Mn-54 Sb-124 Zn-65 Subtotal Total	2.93895E+00 5.51053E+01 1.83684E+00 3.30632E+01 1.10211E+00 7.89843E+00 2.0535E-02 2.0535E-02	5.9200E-04 1.1100E-02 3.7000E-03 6.6600E-03 2.2200E-04 1.5910E-03 2.0535E-02 2.0535E-02	1.6000E-05 3.0000E-04 1.0000E-05 1.8000E-04 6.0000E-06 4.3000E-05 5.6500E-04 5.6500E-04	AU			
4.0095	0.0060	< 0.000E-01	< 8.000E+01	< 1.0000E+02		0.6682											
0.1135	4.4308	< 0.000E-03	< 3.3400E-07	< 1.6700E-06	28-HJ	0.0188	100	Elemental/NP	NP	Am-241 Pu-238 [5.1235E-07 g] Pu-239 [1.4436E-04 g] U-235 [3.9548E-04 g] U-238 [1.6471E-04 kg] Subtotal Total SNM [5.4032E-04 g] Source [1.6471E-04 kg]	1.03368E+00 1.96580E+03 2.01997E+03 1.96355E-01 1.26389E+01 6.5569E-01 6.5569E-01	1.6946E-04 3.2227E-01 3.3115E-01 3.2190E-05 2.0720E-03 1.7721E-02 6.5569E-01 6.5569E-01	4.5800E-06 8.7100E-03 8.9500E-03 8.7000E-07 5.6000E-05 1.7721E-02 1.7721E-02 1.7721E-02	AU			
4.0095	0.0048	< 0.000E-01	< 8.000E+01	< 1.0000E+02		0.6682											
0.2081	58.8161	< 0.000E-03	< 3.3400E-07	< 1.6700E-06	28-HJ	0.2081	100	Elemental/NP	NP	Am-241 Pu-238 [8.7059E-06 g] Pu-239 [1.9355E-03 g] U-235 [4.5000E-03 g] U-238 [1.3912E-03 kg] Subtotal Total SNM [6.4442E-03 g] Source [1.3912E-03 kg]	3.63885E+00 2.51659E+03 2.04048E+03 1.68339E-01 8.04288E+00 9.9418E+00 9.9418E+00	7.9180E-03 5.4760E+00 4.4400E+00 3.6630E-04 1.7501E-02 9.9418E+00 9.9418E+00	2.1400E-04 1.4800E-01 1.2000E-01 9.9000E-06 4.7300E-04 2.6870E-01 2.6870E-01	AU			
7.3507	0.0848	< 0.000E-01	< 8.000E+01	< 1.0000E+02		7.3507											
1.3025	3381.7518	< 0.000E-03	< 3.3400E-07	< 1.6700E-06	28-HJ	0.6513	100	Elemental/NP	NP	Am-241 Pu-238 [3.5588E-03 g] Pu-239 [2.0807E-02 g] Subtotal Total SNM [2.4365E-02 g]	7.82334E+02 1.79967E+03 3.83731E+02 0.0000E+00 0.0000E+00 0.0000E+00 3.6859E+02	(9.7310E+01) (2.2385E+02) (4.7730E+01) (0.0000E+00) (0.0000E+00) (0.0000E+00) (3.6859E+02)	(2.6300E+00) (6.0500E+00) (1.2900E+00) (0.0000E+00) (0.0000E+00) (0.0000E+00) (9.9700E+00)	AU			
45.9990	3.7057	< 0.000E-01	< 8.000E+01	< 1.0000E+02		22.9985											
1.3025	3381.7516	< 0.000E-03	< 3.3400E-07	< 1.6700E-06	28-HJ	0.6513	100	OXIDE/NP	NP	Co-60 Cs-137 Subtotal Total	4.67021E-02 2.23099E-02 8.5840E-03 8.5840E-03	5.8090E-03 2.7750E-03 8.5840E-03 8.5840E-03	1.5700E-04 7.5000E-05 2.3200E-04 2.3200E-04	AU			
45.9990	3.7057	< 0.000E-01	< 8.000E+01	< 1.0000E+02		22.9985											

*

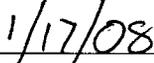
**ENCLOSURE 2
CERTIFICATION**

**RESPONSE TO THE NMED NOVEMBER 16, 2007 ADDENDUM TO THE
OCTOBER 5, 2007 NOTICE OF DISAPPROVAL OF THE LANL FY06 STP,
REVISION 17**

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.



Albert Dye
STP Project Manager
Water Quality & RCRA
Los Alamos National Laboratory
Operator



Date Signed