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Date: April 10, 2008  
Refer To: ENV-RCRA-08-074

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 NEW MEXICO ENVIRONMENT DEPARTMENT  
LETTER DATED MARCH 13, 2008**

In a March 13, 2008 letter, John Kieling of the New Mexico Environment Department's (NMED) Hazardous Waste Bureau listed three issues on the Los Alamos National Laboratory's (LANL) FY06 Site Treatment Plan, Revision 17. Mr. Kieling's comments are repeated below followed by the response to each comment.

**NMED Comment #1**

*"The proposed extended compliance dates for treatability groups LA-W917 and LA-W918 are incorrectly identified throughout the STP update as "8/28/09." The Respondents must correct the error and indicate the actual compliance date of 8/28/08 in the appropriate sections throughout the STP and Compliance Plan Volume."*

**LANL Response**

The proposed compliance date extension of 8/28/09 for off-site shipment of LA-W917 and LA-W918 waste submitted in the November 16, 2007 letter to NMED was intentional and was not an error. The intent in proposing an extension to the LA-W-917 and LA-W918 compliance date by an additional year was to avoid the situation where an approved compliance date is exceeded while a proposed STP Revision is under review by NMED. LANL has made significant progress in reducing its STP covered waste but has not yet found an acceptable treatment pathway for the remaining LA-W917 and LA-W918 waste. LANL cannot currently identify an approved facility that has demonstrated it can successfully treat the LA-W917 and LA-W918 waste, but it will continue efforts to find a facility that can treat the waste. Therefore, LANL is proposing the 8/31/09 compliance date for NMED approval.



**NMED Comment #2**

*"NMED does not approve of the proposed extended compliance date of 12/31/10 for waste treatability group LA-W934. The November 16, 2007 "Addendum to the October 5, 2007 Notice of Disapproval STP FY06 Update and Revision 17.0 Proposal LANL" explained in Comment # 7 that without an adequate rationale and justification for extending compliance dates for shipment, NMED cannot approve such a request. The Respondents failed to provide such justification. However, because of the delay of the FY06 STP Revision 17.0 Approval, NMED will allow the compliance date for shipment to be extended to December 31, 2008."*

**LANL Response**

As discussed in the Response to Comment 1, LANL hopes to avoid future situations where an STP compliance date is exceeded before a decision is made on a proposed STP Revision. Further, the purpose of the FFCO is to provide a remedy for the storage of not only legacy mixed waste but also for newly generated mixed waste. LANL currently has an additional large volume of newly generated LA-W934 mixed low-level waste resulting from the dismantling of glove boxes. This waste will be proposed for coverage under the next STP annual update, Revision 18. LANL will work to have this additional waste removed as soon as possible but it is unlikely that it can occur before 12/31/08. Some of the wastes contain > 10,000 curies of tritium and one item has close to 100,000 curies of tritium. There are currently no facilities in the nation that are permitted to accept that level of radioactive waste. LANL proposes to extend the LA-W934 compliance date to 12/31/09 while it works with commercial facilities to obtain treatment options for these difficult to treat wastes. The requested modified Revision 17 pages showing the 12/31/09 compliance date are enclosed.

**NMED Comment #3**

*Comment #6 in the "Addendum to the October 5, 2007 Notice of Disapproval STP FY06 Update and Revision 17.0 Proposal LANL" highlighted that a March 15, 2006 Notice of Completion of Milestone 3.1.3(D) in the CPV, STP, LANL was submitted to NMED five months past the due date required in the STP. Despite the fact the milestone activity was reported on the previous fiscal year STP Update (FY05) NMED instructed the Respondents to account for this delinquency in the current FY06 STP Revision 17.0 Update in order to keep NMED's Administrative Record current. The Respondent replied that doing so would be "confusing and therefore inappropriate." The only explanation provided to NMED for the delinquency in this notification was that it was "late due to an oversight."*

**LANL Response**

A paragraph has been added to Section 2, page 5 of the Compliance Plan Volume addressing the delinquent letter.

Mr. Kieling's letter, in closing, required the re-submittal of "revisions of pages 3-4 of Attachment C of the Background Volume (BV) and two revision copies of pages 19-20, 27-28 and 40 of Attachment D in the CPV reflecting the appropriate dates." Please note Attachment C of the STP is not the Background Volume (BV) but is the Proposed Revision 17 text.

April 10, 2008

It is assumed Mr. Kieling meant to specify his revisions be applied to pages 3-4 of the Revision 17 text. Revised pages 3-4 of the Revision 17 text are enclosed. Pages 27, 28 and 40 of the CPV are revised to include the proposed compliance date for treatability group LA-W934, High Activity Waste. Lastly, as stated in the response to NMED Comment #3, enclosed are copies of revised pages 4-5, Section 2 of the Compliance Plan Volume, which addresses the submittal of the delinquent letter.

Mr. Kieling required a response by April 15, 2008. If the above responses do not satisfactorily address NMED concerns, it is requested that a meeting be held to try to resolve these issues.

If you have any questions, please call Albert Dye at 667-4715.

Sincerely,



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



Gene Turner  
Environmental Operations  
Los Alamos Site Office

AD:GT/lm

Enclosure: a/s

Cy: James Bearzi, NMED/HWB, Santa Fe, NM, w/enc.  
Michael B. Mallory, PADOPS, w/o enc., A102  
Richard S. Watkins, ADESHQ, w/o enc., K491  
Tori George, ENV-DO, w/o enc., J978  
Gerald O'Leary, WDP-DO, w/o enc., J591  
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

**Revised pages 3-4 of Revision 17 text**

**Table X.C.2.a.-3: FY06 STP MLLW Off-Site Shipments for Recycling**

| Date Shipped        | Destination | MWIR # | Treatability Group | Vol (m <sup>3</sup> ) | Shipping Manifest No. | Date NMED Notified | CPV Section |
|---------------------|-------------|--------|--------------------|-----------------------|-----------------------|--------------------|-------------|
| <i>Total Volume</i> |             |        |                    | 0.00                  |                       |                    |             |

**Table X.C.2.a.- 4: FY06 STP MLLW On-Site Treatment**

| MWIR #              | Treatability Group | Vol (m <sup>3</sup> ) | Date NMED Notified | CPV Section |
|---------------------|--------------------|-----------------------|--------------------|-------------|
| <i>Total Volume</i> |                    | 0.00                  |                    |             |

**Table X.C.2.a.-5: FY06 STP MLLW Off-Site Shipments for Treatability Studies.**

| Date Shipped        | Destination | MWIR # | Treatability Group | Vol (m <sup>3</sup> ) | Shipping Manifest No. | Date NMED Notified | CPV Section |
|---------------------|-------------|--------|--------------------|-----------------------|-----------------------|--------------------|-------------|
| <i>Total Volume</i> |             |        |                    | 0.00                  |                       |                    |             |

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

DOE and LANS 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.-6: Proposed Administrative Adjustments**

| MWIR Waste ID    | Treatability Group       | Volume (m <sup>3</sup> ) | Comments          | CPV Section |
|------------------|--------------------------|--------------------------|-------------------|-------------|
| LA-W924          | <i>Lead Wastes – TBD</i> | (0.1532)                 | Volume Correction | 3.2         |
| <i>Net Total</i> |                          | (0.1532)                 |                   |             |

A February 23, 2007 letter proposed administrative adjustments of 0.0001 m<sup>3</sup> for LA-W909 and 0.0001 m<sup>3</sup> for LA-W910. These were determined to be unnecessary and are excluded from this table.

***Extension of milestone activity dates***

DOE and LANS are requesting that the following milestone activity dates be extended to secure offsite shipment and treatment or because currently there is no path forward for the waste streams.

**Table X.C.2.a.-7: Proposed Extensions of Milestone Activity Compliance Dates**

| 3.1.5(A) | <i>LA-W922 Noncombustible Debris</i>                | 08/25/2003 | 12/31/08                       | An extension of this Compliance Date is requested to secure offsite treatment and to complete shipment of this waste stream newly generated in FY06.  |
|----------|---|------------|--------------------------------|---|
| 3.1.8(A) | <i>LA-W917 Compressed Gases Requiring Scrubbing</i> | 08/09/2007 | 08/28/2009                     | An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream. It is hoped that radioactivity will have decayed to an amount acceptable to commercial Treatment Storage and Disposal Facilities (TSDF), or that the items will be found amenable to treatability studies, and can be removed from inventory   |
| 3.1.9(A) | <i>LA-W918 Compressed Gases Requiring Oxidation</i> | 08/09/2007 | 08/28/2009                     | An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream. It is hoped that radioactivity will have decayed to an amount acceptable to commercial TSDFs, or that the items will be found amenable to treatability studies, and can be removed from inventory  |
| 3.2(J)   | <i>LA-W934 High Activity Wastes</i>                 | 12/31/2007 | 12/31/ <del>2010</del><br>2009 | An extension of this Compliance Date is requested because there is no path forward at this time for some items within these waste streams. In addition, this treatability group includes waste stream items newly generated in FY06. It is hoped that radioactivity will have decayed to an amount acceptable to commercial TSDFs, or that the items will be found amenable to treatability studies, and can be removed from inventory. |

**Table X.C.2.a.-3: FY06 STP MLLW Off-Site Shipments for Recycling**

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|---------------------|-------------|--------|--------------------|-----------------------|-----------------------|--------------------|-------------|
| <i>Total Volume</i> |             |        |                    | 0.00                  |                       |                    |             |

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| MWIR #              | Treatability Group | Vol (m <sup>3</sup> ) | Date NMED Notified | CPV Section |
|---------------------|--------------------|-----------------------|--------------------|-------------|
| <i>Total Volume</i> |                    | 0.00                  |                    |             |

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**Revised pages 27, 28 and 40 of the LANL CPV Rev 17**

|   |   |
|---|---|
| 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 | 12/31/4009  |
| 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 <sup>3</sup> ) | Net volume (m <sup>3</sup> ) | Net volume (m <sup>3</sup> ) |
| lead for surface decontamination | LA-W930-0 LA-W930-5 | 0.00                         | 0.00                         | 0.00                         |
| <b>Totals</b>                    |                     | <b>0.00</b>                  | <b>0.00</b>                  | <b>0.00</b>                  |

Note: See below for additional wastes in this treatability group

**Treatment:**

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 Dates |
|----------------------------------|------------------|
| A. Complete lead decontamination | 09/30/97         |

Lead shapes and forms in the second category.

|   |   |
|---|---|
| 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 | 12/31/4009  |
| 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 <sup>3</sup> ) | Net volume (m <sup>3</sup> ) | Net volume (m <sup>3</sup> ) |
| lead for surface decontamination | LA-W930-0 LA-W930-5 | 0.00                         | 0.00                         | 0.00                         |
| <b>Totals</b>                    |                     | <b>0.00</b>                  | <b>0.00</b>                  | <b>0.00</b>                  |

Note: See below for additional wastes in this treatability group

**Treatment:**

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.

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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 Dates |
|----------------------------------|------------------|
| A. Complete lead decontamination | 09/30/97         |

Lead shapes and forms in the second category.

|   |   |
|---|---|
| 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 | 12/31/09  |
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#### 3.3.1 Lead Decontamination

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| Treatability group               | MWIR waste ID       | First Category               | Second Category              | Totals                       |
|----------------------------------|---------------------|------------------------------|------------------------------|------------------------------|
|                                  |                     | Net volume (m <sup>3</sup> ) | Net volume (m <sup>3</sup> ) | Net volume (m <sup>3</sup> ) |
| lead for surface decontamination | LA-W930-0 LA-W930-5 | 0.00                         | 0.00                         | 0.00                         |
| <b>Totals</b>                    |                     | <b>0.00</b>                  | <b>0.00</b>                  | <b>0.00</b>                  |

Note: See below for additional wastes in this treatability group

**Treatment:**

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 Dates |
|----------------------------------|------------------|
| A. Complete lead decontamination | 09/30/97         |

Lead shapes and forms in the second category.

|   |   |
|---|---|
| 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 | 12/31/09  |
| 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 <sup>3</sup> ) | Net volume (m <sup>3</sup> ) | Net volume (m <sup>3</sup> ) |
| lead for surface decontamination | LA-W930-0 LA-W930-5 | 0.00                         | 0.00                         | 0.00                         |
| <b>Totals</b>                    |                     | <b>0.00</b>                  | <b>0.00</b>                  | <b>0.00</b>                  |

Note: See below for additional wastes in this treatability group

**Treatment:**

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 Dates |
|----------------------------------|------------------|
| A. Complete lead decontamination | 09/30/97         |

Lead shapes and forms in the second category.

| Action        | Document Modified | Effective Date | Effect on FFCO/STP  |
|---------------|-------------------|----------------|---|
| Rev. 9.0      | STP/CPV           | 6/7/00         | 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           | 12/18/00       | Added and deleted volumes reported in FY99 <i>Annual Update</i> to certain treatability groups.   |
| Rev. 11.0     | STP/CPV           | 4/18/01        | Added and deleted volumes reported in FY00 <i>Annual Update</i> .   |
| Rev. 12.0     | STP/CPV           | 3/13/02        | Added and deleted volumes reported in FY01 <i>Annual Update</i> . Extended CPV Activity 3.1.5A Compliance Date to 8/25/03. Extended CPV Activity 3.1.11A to 2/01/04. Removed the requirement to develop treatment technologies and the associated compliance schedule in CPV Activity 4.0 and added language specifying that MTRU waste would be shipped off-site to WIPP for disposal.   |
| Rev 13.0      | STP/CPV           | 7/14/03        | Added and deleted volumes reported in FY02 <i>Annual Update</i>   |
| Rev 14.0      | STP/CPV           | 1/5/05         | Added and deleted volumes reported in FY03 <i>Annual Update</i>   |
| Rev 15.0      | STP/CPV           | 8/16/05        | Added and deleted volumes reported in FY04 <i>Annual Update</i>   |
| Rev 16.0      | STP/CPV           | 12/12/06       | Added and deleted volumes reported in FY05 <i>Annual Update</i> . Extended CPV Activity 3.1.8(A) Compliance Date to 8/09/07. Extended CPV Activity 3.1.9(A) Compliance Date to 8/09/07. Extended CPV Activity 3.1.10(A) Compliance Date to 8/31/07. Extended CPV Activity 3.1.11(A) Compliance Date to 12/31/07. Extended CPV Activity 3.2(J) Compliance Date to 12/31/07. Reclassified 0.2082 m <sup>3</sup> of LA-W934 High Activity MLL waste to MTRU waste. |
| Rev 17.0      | STP/CPV           | TBD            | Added and deleted volumes reported in FY06 <i>Annual Update</i> . Extended CPV Activity 3.1.5(A) Compliance Date to 12/31/08. Extended CPV Activity 3.1.8(A) Compliance Date to 8/28/09. Extended CPV Activity 3.1.9(A) Compliance Date to 8/28/09. Extended CPV Activity 3.2(J) Compliance Date to 12/31/4009.   |

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**Revised pages 4-5 of the Compliance Plan Volume, Section 2**

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**TABLE 2.1 B: FY06 CORRESPONDENCE**

|           |   |                  |
|-----------|---|------------------|
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| 1/24/2006 | Notice of completion of off-site waste shipment                                   | SWRC:06-005      |
| 3/23/06   | STP FY05 Update transmittal letter  | ENV-SWRC:06-021  |
| 4/20/2006 | Request for expedited shipment  | ENV-SWRC:06-032  |
| 5/12/2006 | Request for expedited shipment  | ENV-SWRC:06-038  |
| 6/13/2006 | Notice of completion of off-site waste shipment                                   | ENVP-RCRA:06-007 |
| 6/28/2006 | Notice of completion of off-site waste shipment                                   | ENVP-RCRA:06-024 |
| 8/23/2006 | Notice of completion of off-site waste shipment                                   | ENV-RCRA:06-055  |
| 9/8/2006  | Response to NMED comments on STP FY05 update                                      | ESH&Q-06-033     |
| 9/25/2006 | Response to NMED request to use the 1995 TWBIR numbering system in the Annual STP | ESH&Q-06-033     |

**3.0 DESCRIPTION OF WASTE DELETED IN ACCORDANCE WITH FFCO SECTION IX (DELETION OF WASTE).**

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**4.0 DOCUMENTATION OF NEW COVERED WASTE IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION VIII (ADDITION OF NEW COVERED WASTE.)**

A proposal for addition of STP waste items will be included with this update as Proposed Revision 17.0. These additions consist of waste that was placed in storage during FY05 and became covered waste in FY06. A detailed description of these covered wastes and associated extension of milestones required to treat and dispose of a portion of this new covered waste is included with this update in the FY06 *Background Volume Update* and in *Revision Proposal 17.0*.

**5.0 ANY OTHER CHANGES TO THE OVERALL SCHEDULE IN THE COMPLIANCE PLAN VOLUME.**

Proposal for extension of milestone activities 3.1.5, 3.1.8, 3.1.9 and 3.2 due to the unavailability of off-site treatment technologies for radioactively contaminated noncombustible debris, compressed gas cylinders and high activity waste will be included with this update as Proposed Revision 17.0.

There were no other changes to the overall schedule in the Compliance Plan Volume of the Site Treatment Plan.

**BIBLIOGRAPHY**

1. *Federal Facility Compliance Order, Los Alamos National Laboratory*” New Mexico Environment Department (October 4, 1995).
2. “*Site Treatment Plan (STP), Fiscal Year 2005 update and Revision 16.0 Proposal, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO), October 4, 1995,*” Albert Dye, STP Project Manager to Ms. Lee Winn, Environmental Specialist, March 23, 2006.
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| 4/20/2006 | Request for expedited shipment  | ENV-SWRC:06-032  |
| 5/12/2006 | Request for expedited shipment  | ENV-SWRC:06-038  |
| 6/13/2006 | Notice of completion of off-site waste shipment                                   | ENVP-RCRA:06-007 |
| 6/28/2006 | Notice of completion of off-site waste shipment                                   | ENVP-RCRA:06-024 |
| 8/23/2006 | Notice of completion of off-site waste shipment                                   | ENV-RCRA:06-055  |
| 9/8/2006  | Response to NMED comments on STP FY05 update                                      | ESH&Q-06-033     |
| 9/25/2006 | Response to NMED request to use the 1995 TWBIR numbering system in the Annual STP | ESH&Q-06-033     |

**3.0 DESCRIPTION OF WASTE DELETED IN ACCORDANCE WITH FFCO SECTION IX (DELETION OF WASTE).**

A proposal for deletion of STP waste items will be included with this update as Proposed Revision 17.0. These deletions are proposed due to off-site shipments for treatment, disposal, or recycling. A detailed description of these covered wastes is provided in the FY06 *Background Volume Update* and in *Revision Proposal 17.0*.

**4.0 DOCUMENTATION OF NEW COVERED WASTE IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION VIII (ADDITION OF NEW COVERED WASTE.)**

A proposal for addition of STP waste items will be included with this update as Proposed Revision 17.0. These additions consist of waste that was placed in storage during FY05 and became covered waste in FY06. A detailed description of these covered wastes and associated extension of milestones required to treat and dispose of a portion of this new covered waste is included with this update in the FY06 *Background Volume Update* and in *Revision Proposal 17.0*.

**5.0 ANY OTHER CHANGES TO THE OVERALL SCHEDULE IN THE COMPLIANCE PLAN VOLUME.**

Proposal for extension of milestone activities 3.1.5, 3.1.8, 3.1.9 and 3.2 due to the unavailability of off-site treatment technologies for radioactively contaminated noncombustible debris, compressed gas cylinders and high activity waste will be included with this update as Proposed Revision 17.0.

There were no other changes to the overall schedule in the Compliance Plan Volume of the Site Treatment Plan.

**BIBLIOGRAPHY**

1. *Federal Facility Compliance Order, Los Alamos National Laboratory*” New Mexico Environment Department (October 4, 1995).
2. “*Site Treatment Plan (STP), Fiscal Year 2005 update and Revision 16.0 Proposal, Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO), October 4, 1995,*” Albert Dye, STP Project Manager to Ms. Lee Winn, Environmental Specialist, March 23, 2006.
3. *Proposed Revision 16.0, Annual Update to Site Treatment Plan, Federal Facilities Compliance Order Los Alamos National Laboratory EPA ID #NM0890010515 HWB-LANL-FFCO,* to Albert Dye, Los Alamos National Laboratory STP Project Manager and James Nunz, Department of Energy LASO Waste Management Program Manager, December 12, 2006.