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Date: August 28, 2008
Refer To: ENV-RCRA-08-177

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
AUGUST 8, 2008 NOTICE OF DISAPPROVAL OF SITE TREATMENT
PLAN (STP) FISCAL YEAR 2007 (FY07) UPDATE AND REVISION 18.0**

In an August 8, 2008 letter, the New Mexico Environment Department's (NMED) Hazardous Waste Bureau issued a Notice of Disapproval for the Los Alamos National Laboratory proposed Site Treatment Plan (STP) Fiscal Year 2007 (FY07) Update and Revision 18.0. The Los Alamos National Security, L.L.C. (LANS) and the U.S. Department of Energy's National Nuclear Security Administration offer the following responses to each of NMED's comments.

NMED Comment #1

Waste treatability group LA-W933 (lab packs) in Table 2.1-2 (page 4) of the Background Volume (BV) indicates that two shipments were made to Perma-Fix on May 21, 2007. According to the June 26, 2007 "Notice of Completion of Off-Site Waste Shipment Activities" (referenced by ENV-RCRA: 07-161) and associated manifests, only one shipment of labpacks was sent to Perma-Fix; the other was shipped to Diversified Scientific Services, Inc. (DSSI) in Kingston, TN. Revise the text in Table 2.1-2 to state that one of the shipments was sent to DSSI and not Perma-Fix.

LANL Response

Background Volume Table 2.1-2 has been revised accordingly.

NMED Comment #2

Waste treatability group LA-W925 (mercury wastes) specifies an administrative adjustment of 0.3398 cubic meters (m3). Reported administrative adjustments in past STP Updates have typically consisted of relatively insignificant volumes (i.e., 0.0001 m3 or 0.0004 m3). The Respondents must provide justification in Section 3.6 (Administrative Adjustments and Corrections) of the BV for an administrative adjustment that resulted in a volume of nearly two 55-gallon drum equivalents.



LANL Response

Waste item 2344996 with volume of 0.3398 m³ was generated and stored at TA-55 prior to being transferred to TA-54. The STP data indicates that the volume for item 2344996 was inadvertently counted twice resulting in an additional volume of 0.3398 m³. An explanation of the administrative adjustment for LA-W925 has been added to the STP Background Volume Table 3.6-1.

NMED Comment #3

Waste treatability group LA-W935 (10-100 nCi/g waste) in Table 2.1-2 indicates that 16.656 m³, 51.4254 m³, and 4.372 m³ were shipped to Materials & Energy Corporation (M&EC) on September 25, 2007, September 27, 2007, and June 20, 2007, respectively. According to the November 5, 2007 "Notice of Completion of Off-Site Waste Shipment Activities" (referenced by ENV-RCRA-07-254) and associated manifests and the July 25, 2007 "Notice of Completion of Off-Site Waste Shipment Activities" (referenced by ENV-RCRA: 07-177) and associated manifests, the Respondents indicate that the waste shipped was high activity waste which is assigned the Mixed Waste Inventory Record (MWIR) identification code LA-W934, not LA-W935. Revise the text in Table 2.1-2 to reflect that the shipments of 16.656 m³, 51.4254 m³, and 4.372 m³ were coded LA-W934 and not LA-W935. The Respondents must also amend the correct total volumes in the "FY07 Annual Update (m³)" column in Table 2.1-2 for the two respective waste treatability groups. The Respondents must revise all other appropriate Tables and Sections that reflect this change. This includes, but is not limited to, Table 3.6-1 (Administrative Adjustments and Corrections) on page 19 of the BV and pages 26 and 35 in Attachment C of the Compliance Plan Volume (CPV).

LANL Response

In the 2007 Notice of Completion of Off-Site Waste Shipment Activities referenced above, LANS identified the 10-100 nCi/g wastes as LA-W934 High Activity Waste but also stated the waste would be reported in the next STP update as LA-W935 waste. LANS sent a separate notice dated March 11, 2008 proposing the creation of a new STP treatability group and stated that these waste stream activities would be reported as transfers in subsequent STP updates under the LA-W935 treatability group. NMED staff did not indicate any objection to these proposals, so LANS proceeded with reporting the waste as LA-W935. However, LANS will revise the STP to reflect the waste as LA-W934 waste. Further, until NMED approves the addition of the LA-W935 treatability group to the FY07 STP, LANS will report any subsequent shipments of 10-100nCi/g waste as LA-W934 waste.

NMED Comment #4

Waste treatability group LA-W935 (10-100 nCi/g waste) in Table 2.1-2 indicates that 51.4254 m³ was shipped to Materials & Energy Corporation (M&EC) on September 27, 2007. According to the above-referenced Notice of Completion and its associated manifests, the Respondents notified NMED that this waste shipment was sent to PermaFix in Florida, not M&EC on the 27th of September. Also, the total net volume in Table 2.1-2 states the volume shipped on September 27, 2007 was 51.4254 m³ while the total identified in the Notice of Completion is 51.6336 m³. Revise the text in Table 2.1-2 to reflect the accurate volume of waste shipped as well as the correct destination.

LANL Response

Background Volume Table 2.1-2 has been revised to show the correct receiving facility for the September 27, 2007 shipment, i.e., M&EC. However, 51.4254 m³ is the correct volume for the September 27, 2007 shipment. The discrepancy is with the volume reported in Table 2 of the November 5, 2007 "Notice of Completion of Off-Site Waste Shipment Activities" (ENV-RCRA-07-254). Table 2 erroneously listed one additional container that was not shipped. A corrected "Notice of Completion of Off-Site Waste Shipment Activities" for the September 27, 2007 shipment is being sent under separate cover. LANS regrets the error.

NMED Comment #5

Table X.C.2.a.-7 (Proposed Extensions of Milestone Activity Compliance Dates) on page 4 of Attachment C in the CPV states the Revision 17.0 compliance date for milestone activity 3.1.5(A) (waste treatability group LA-W922, non-combustible debris) as "08/25/2003." The Respondents, however, proposed in the STP FY06 Update Revision 17.0 Proposal (ENV-RCRA: 07-043) a compliance date of "12/31/08" for this treatability group. This date was approved by NMED and thus made effective June 24, 2008 (see NMED letter to the Respondents dated June 24, 2008). Revise the column entitled "Revision 17 Compliance Date" in Table X.C.2.a.-7 in Revision 18.0 to indicate the date of 12/31/08, not 08/25/2003.

LANL Response

LANS has scheduled the remaining volume of the LA-W922 waste for off-site shipment within the next two months and thus, the proposed extension for Activity 3.1.5(A) appears to be unnecessary. All references to LA-W922 in Table X.C.2.a.-7, (including the milestone dates in question) have been deleted entirely, making moot the issue on the proper date in the table.

NMED Comment #6

Table X.C.2.a.-7 on page 4 of Attachment C in the CPV states the Revision 17.0 compliance dates for milestone activities 3.1.8(A) (waste treatability group LA-W917, compressed gases requiring scrubbing) and 3.1.9(A) (waste treatability group LA-W918, compressed gases requiring oxidation) as "08/09/2008." The Respondents, however, proposed in the STP FY06 Update Revision 17.0 (ENV-RCRA: 07-043) the compliance date of "08/28/08" for this treatability group. August 28, 2008 was the date approved by NMED on June 24, 2008 and is therefore the effective date. Revise the column entitled "Revision 17 Compliance Date" in Table X.C.2.a.-7 in Revision 18 to read 08/28/08, not 08/09/2008. (See the tables in Section 3.1.8 on page 19 and Section 3.1.9 on page 20 which reflect the correct dates.)

LANL Response

Table X.C.2a.-7 has been revised to include the correct compliance dates.

NMED Comment #7

Table 2.1-2 ("FY07 MLLW Inventory Detailed Update by Treatability Group") on page 3 of the BV indicates a net volume of 0.0602 m³ for waste treatability group LA-W918 (compressed gases requiring oxidation). However, page 19 in Attachment C states the net volume is 0.0758 m³. The Respondents must amend page 19 so that it correctly reports the net volume shown in Table 2.1-2.

LANL Response

The reported volume for LA-W918 on page 19 of the LANL CPV has been corrected.

NMED Comment #8

The Respondents propose an extension of one year for the compliance date for Activity 3.1.5(A) in Attachment C. According to Section X(C)(2)(a-d) of the Federal Facilities Compliance Order (FFCO), "when the Respondents propose a revision, they shall provide NMED a written proposal which includes:

- (a) a detailed description of the proposed revision;*
- (b) the rationale for the proposed revision;*
- (c) the anticipated length of any delay in performance...; and*
- (d) ...a plan for implementing all reasonable measures to address the cause of the delay..."*

In order for NMED to consider the proposed milestone compliance activity date change, 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)."*

Revise the Update providing the rationale and justification for the additional one year extension of the milestone activity compliance date.

LANL Response

LANS has scheduled the remaining volume of the LA-W922 waste for off-site shipment within the next two months. The proposed extension for Activity 3.1.5(A) appears to be unnecessary, and the date has been reset in the LANL CPV to the FY06 STP approved date of 12/31/2008. If LANS cannot ship the waste as anticipated, a timely request for an extension will be made to NMED.

NMED Comment #9

The Respondents submitted the STP FY07 Update Revision 18.0 Proposal on May 1, 2008. However, the Respondents' submittal did not include NMED's modifications (see NMED Public Notice No. 08-05 dated May 21, 2008). NMED received the Respondents' Revision 18.0 modified pages submittal (referenced by ENV-RCRA-08-141) on July 8, 2008. Revise the Update to include this submittal in Table 1.1 A (FY07 FFCO and STP Milestones) of Attachment B (page 2) in the CPV.

LANL Response

The FY07 STP update was submitted to NMED on April 25, 2008. NMED directed LANS by letter dated to update tables

NMED Comment #10

The STP FY06 Update Revision 17.0 was approved with modifications by NMED and thus became effective June 24, 2008 (see NMED letter to the Respondents dated June 24, 2008). The Respondents must correct cell "Rev 17.0" in Table A-1 (Summary of Changes to the CPV and the FFCO) in the CPV (page 41) to list the date as "6/24/2008" not "6/26/2008."

LANL Response

The date of the NMED approval letter received by LANS was 6/26/2008, copy attached as Enclosure 2. A second letter dated 6/27/08 from John Kieling of NMED begins by stating NMED approved the FY06 STP on "June 26, 2008." From documents received from NMED, the approval date of 6/26/2008 appears to be correct and no changes are needed.

NMED Comment #11

The following letters' identification numbers in Table 2.1 B (FY07 Correspondence) in Attachment B (page 3) in the CPV are not applicable to correspondence between the Respondents and NMED for the FY07 STP Update Revision 18.0:

- a. ENV-RCRA: 07-032 dated 2/23/2007;
- b. ENV-RCRA: 07-043 dated 3/13/2007;
- c. ENV-RCRA: 07-235 dated 10/2/2007;
- d. ENV-RCRA: 07-256 dated 11/13/2007; and
- e. ENV-RCRA: 07-273 dated 12/11/2007.

Delete from the Table the references to these letters which are associated with FY06 STP Update Revision 17.0.

LANL Response

References to the first four letters listed above have been deleted from the table, but not the reference to the fifth letter. The 12/11/2007 letter (ENV-RCRA: 07-273) pertains to the FY06 STP but also to the FY07 STP updates because it requests an extension to submit the FY07 STP update.

NMED Comment #12

The Respondents have not adequately listed in Table 2.1 B all appropriate letters of correspondence sent from the Respondents to NMED during FY07 for Revision 18.0. The Respondents must revise the Table to cite all appropriate correspondence. This includes but is not limited to:

- a. ENV-RCRA: 08-062 dated 3/20/2008;
- b. ENV-RCRA: 07-063 dated 4/12/2007;
- c. ENV-RCRA: 08-063 dated 3/20/2008;
- d. ENV-RCRA: 08-061 dated 3/20/2008;

- e. ENV-RCRA-08-091 dated 5/08/2008;
- f. ENV-RCRA-08-055 dated 3/11/2008;
- g. ENV-RCRA-08-079 dated 4/21/2008; and
- h. Email dated 4/1/08 from A. Dye to R. Kay "Subject: Re. Clarification for the Administrative Record.

LANL Response

The above items, as well as other appropriate correspondence, have been added to the Table 2.1.B

NMED Comment #13

Waste treatability group LA-W922 (Noncombustible Debris) in Table 2.1-2 on page 3 of the BV indicates in the column entitled "FY06 Annul Update (m³)" a total volume of 0.00 m³; this volume is incorrect. The Respondents must revise the Table to accurately list the volume in the FY06 column as 0.0015 m³ (see STP FY06 Update Revision 17.0 final volume for LA-W922).

LANL Response

Background Volume Table 2.1-2 has been revised accordingly.

NMED Comment #14

As a reminder, when notices of completion of milestone activities are met, (i.e., when the Respondents complete shipping of existing wastes to an off-site treatment facility, submit documentation assigning waste items to applicable treatability groups, complete assaying, or complete a parallel option (see e.g., Activities 3.1.8(A) and (B) in the CPV)), the Respondents must fulfill all relevant reporting requirements in the FFCO. Section XX(C)(1) states "Respondents shall as expeditiously as possible, but in no event more than ten (10) days after a compliance date, provide notice in writing to NMED of the completion of the activity required to be completed by that compliance date." The Respondents have in the past fulfilled the FFCO milestone activity completion reporting requirement, though not consistently (see the table in NMED's letter dated May 1, 2008 for examples of non-compliance.) Section VI of the FFCO also states "Respondents shall carry out all activities in accordance with the schedules and requirements set forth in the CPV of the STP and this Order" and "[t]he Compliance Plan Volume of the STP provides over all schedules...based on compliance dates as defined in Section IV (Definitions)." Section IV(B) defines a compliance date as "a fixed, firm, and enforceable date on or before which a task must be completed in accordance with the provisions of the STP." The Respondents must submit notices of completion of milestone activities as they are met in accordance with Section VI of the FFCO. Failure to provide a "Notice of Completion of Milestone Activity" letter for the completion of all milestone activities to NMED may result in enforcement action.

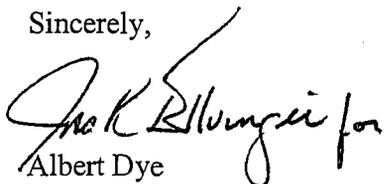
LANL Response

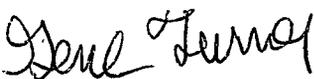
LANL will comply with the reporting requirements of the FFCO and STP. However, please note that some sections of the LANL CPV have a single "Complete shipping of wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option" milestone compliance date for several treatability groups, such as Section 3.2. LANS staff interpret completion of this activity requires the off-site shipment of all wastes identified under the section.

Enclosed are two copies of the revised STP and an electronic copy showing the changes in redline-strikeout format. In order to maintain controlled copies of regulatory documents submitted to NMED and to maintain a clear administrative record, LANS prefers not to submit electronic copies in formats, in particular MS Word documents, which can be altered or edited without our knowledge. As an alternative, enclosed is an electronic copy of the Update in Adobe PDF format

Thank you for your comments and 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 Permitting Manager
Los Alamos Site Office
National Nuclear Security Administration

AD:GT/lm

Enclosures: 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
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-DO, File, w/enc., J978
ENV-RCRA, File, w/enc., K490
IRM-RMMSO, w/enc., A150

ENCLOSURE 1

2 COPIES OF THE FY07 STP UPDATE

**FY07 Annual STP Update
Background Volume**

05/1/2008

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	0	0		0	0
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	0	0		0	0
3.1.5	LA-W912 Combustible Debris	0	0		0	0
3.1.5	LA-W921 Activated or Inseparable Lead	0	0		0	0
3.1.5	LA-W922 Noncombustible Debris	0.00150	0.00150		0.0015	2
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0	0		0	0
3.1.6	LA-W914 Corrosive Solutions	0	0		0	0
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0	0		0	0
3.1.7	LA-W916 Water-Reactive Wastes	0	0		0	0
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.0080	0		0.0080	0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.0758	-0.0152 -0.0004	Shipped to M&EC 5/21/07 Administrative Adjustment	0.0602	0
3.1.10	LA-W920 Elemental Mercury	0.0009	-0.0009	Shipped to M&EC 3/5/07	0	0
3.1.11	LA-W907 Halogenated Organic Liquids	0	0		0	0
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0	0.0009	Newly Generated	0.0009	0
3.1.11	LA-W909 Bulk Oils	0.0568	-0.0568	Shipped to PermaFix 3/5/07	0	0

**FY07 Annual STP Update
Background Volume**

05/1/2008

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.1.11	LA-W910 PCB Wastes with RCRA Components	0	0		0	
3.1.11	LA-W923 Liquid and Solid Oxidizers	0	0		0	0
3.2	LA-W924 Lead Wastes – TBD	0.7003	-0.2271 -0.4732 0.4164 -0.4164	Shipped to ESI 12/18/06 Shipped to ESI 6/4/07 Newly Generated Newly Generated Shipped to ESI 6/4/07	0	
3.2	LA-W925 Mercury Wastes – TBD	1.3231	-0.3398 0.0379 -0.3398	Shipped to M&EC 3/5/07 Newly Generated Administrative Adjustment	0.6814	1.5
3.2	LA-W926 Compressed Gases – TBD	0	0		0	0
3.2	LA-W927 Biochemical Laboratory Wastes	0	0		0	0
3.2	LA-W928 Dewatered Treatment Sludge	0	0		0	0
3.2	LA-W932 Explosives	0	0		0	
3.2	LA-W933 Lab Packs	0.4164	-0.2082 -0.2082	Shipped to Perma-Fix 5/21/07 Shipped to Perma-Fix DSSI 5/21/07	0	2
3.2	LA-W934 High Activity Waste	1.5296	0.4164 40.2046 <u>85.5702</u> <u>-4.3722</u> <u>-16.656</u> <u>-51.4254</u> <u>-13.1166</u>	Administrative Adjustment (Transfer from covered MTRU Inventory) Newly Generated <u>Administrative Adjustment (Transfer from covered MTRU Inventory)</u> <u>Shipped to M&EC 6/20/07</u> <u>Shipped to M&EC 9/25/07</u> <u>Shipped to M&EC 9/27/07</u> <u>Administrative Adjustment (Transfer to LA-W935)</u>	42.1506	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0	0		0	0

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0	0		0	0
3.3.3	LA-W931 Lead Requiring Sorting	0	0		0	0
3.3.4	LA-W935 10-100 nCi/g waste	NA	85.5702 -4.3722 -16.656 -51.4254 13.1166	Administrative Adjustment (Transfer from covered MTRU Inventory) Shipped to M&EC 6/20/07 Shipped to M&EC 9/25/07 Shipped to M&EC 9/27/07 Administrative Adjustment (Transfer from LA-W934)	13.1166	251
3.4	Missing/ nonexistent/ TBV category	0	0		0	N/A
TOTALS		4.1124	51.9068		56.0192	

2.2 MIXED TRANSURANIC (MTRU) INVENTORY SUMMARY

During FY07, MTRU covered inventories decreased from approximately 4104 m³ to 3845 m³. Table 2.2-1 summarizes changes to the estimated MTRU covered waste inventory for FY07.

Table 2.2-1: Covered MTRU Inventory Summary

Description	Volume (M3)
Covered MTRU Inventory Reported in FY06	4104.4
Covered MTRU Waste to WIPP	(265.6)
Reclassified as MLLW	(69.8)
New Covered MTRU Waste	30.2
CMR and TA-55 Covered MTRU Waste	45.5
Covered MTRU Inventory At End of FY07	3845

The estimated covered MTRU waste inventory at LANL is described by treatability group in Table 2.2-2 below. This table presents the estimated volume of covered MTRU waste for each treatability group.

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

3.6 ADMINISTRATIVE ADJUSTMENTS AND CORRECTIONS

Administrative adjustments and corrections are due to discrepancies found during quality control activities related to preparing waste for treatment, inventory, and disposal or when preparing for the STP Annual Update. These adjustments may result in additions of newly identified covered waste, transfers of waste to other treatability groups, or transfers of waste to the *missing/nonexistent/TBV* category of the STP. A thorough data quality review is conducted annually to compare shipment notifications with shipping manifests against database updates. The discrepancies in the following table were discovered when preparing the FY07 Annual Update to the STP.

TABLE 3.6-1: Administrative Adjustments and Corrections

MWIR Waste ID	Treatability Group	Volume (m ³)	Comments	CPV Section
LA-W918	<i>Compressed Gases Requiring Oxidation</i>	-0.0004	Excess Inventory Reported	3.1.9
LA-W925	<i>Mercury Wastes – TBD</i>	-0.3398	<u>Duplicate volume for one container reported</u>	3.2
LA-W934	<i>High Activity Waste</i>	0.4164	Transfer from covered MTRU Inventory	3.2
<u>LA-W934</u>	<u>High Activity Waste</u>	<u>-13.1166</u>	<u>Transfer to LA-W935</u>	<u>3.2</u>
LA-W935	<i>10 – 100 nCi/g Waste</i>	85.5702	Transfer from covered MTRU Inventory	3.3.4
<u>LA-W935</u>	<u>10 – 100 nCi/g Waste</u>	<u>13.1166</u>	<u>Transfer from LA-W934</u>	<u>3.3.4</u>
<i>Net Total</i>		85.6464		

3.7 OTHER TYPES OF MIXED WASTE ACTIVITIES

No other MLLW activities were performed.

4.0 TREATMENT TECHNOLOGY DEVELOPMENT

During FY07, the availability of commercial and federal facility off-site treatment and disposal capacity for MLLW remained stable. As a result of DOE's increasing reliance on commercial treatment/disposal for mixed wastes, nearly all funding for onsite technology development has been reprioritized to support off-site treatment and disposal of mixed wastes. DOE treatment technology development initiatives are generally limited to specific technologies or technology adaptations in response to specific needs that cannot be addressed through commercial facilities.

1.0 INTRODUCTION.

On October 4, 1995, the New Mexico Environment Department (NMED) issued a Federal Facility Compliance Order (FFCO) to the Department of Energy (DOE) and its then management and operating contractor, the University of California (UC) Regents. The FFCO requires Los Alamos National Laboratory (LANL) to implement the Site Treatment Plan (STP) for the treatment of mixed waste at LANL. The STP was written to address treatment capacities and technologies to treat all of LANL's mixed waste, regardless of the time it was generated. Section VII of the FFCO requires LANL to submit an *Annual Site Treatment Plan Update (Update)* to the NMED each year on or before March 31. On June 1, 2006, Los Alamos National Security, LLC (LANS) replaced UC as operating contractor of LANL at which time LANS assumed responsibility for compliance with the FFCO.

The STP contains two volumes, the Compliance Plan Volume (CPV) and the Background Volume (BV). The FFCO requires that the Annual Update bring the information in both volumes current to the end of the previous federal fiscal year (FY). The update to the CPV contains changes and revisions to the CPV occurring since the previous Annual Update; proposed revisions and amendments, including compliance date changes; a description of waste deleted in accordance with the requirements in Section IX (Deletion of Waste); documentation of new covered waste in accordance with the requirements in Section VIII (Addition of New Covered Waste); and any other changes to the overall schedule in the CPV of the STP. The Annual Update to the CPV identifies changes that require NMED approval as a revision under Section X (Revisions) or an amendment under Section XI (Other Amendments to the STP). This document constitutes the update to the CPV.

1.1 ACTIVITIES COMPLETED DURING FY07.

During FY07, DOE and LANS completed the required CPV Activities on or before their required Compliance Dates as described below in Table 1.1A.

TABLE 1.1 A: FY07 FFCO AND STP MILESTONES

STP or FFCO	STP/FFCO Reference	Title/Text	Treatability Group	Compliance Date*
FFCO	VII.A.	Submit Annual STP Update	N/A	5/1/08
FFCO		<u>Submit STP revisions required by NMED approval modified pages to STP</u>		<u>7/8/08</u>

2.0 CHANGES AND REVISIONS TO THE CPV OCCURRING SINCE THE PREVIOUS ANNUAL UPDATE.

This section describes revisions, amendments, or other changes to the LANL CPV approved in FY07 under the FFCO. The STP Compliance Plan Volume has been modified a number of times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. CPV Appendix A, *Summary of STP/FFCO Chronology*, provides a summary of these CPV changes and of modifications to the FFCO since its issuance. Revision 17.0 was proposed in FY07 and approved during FY08.

2.1 REVISIONS AND AMENDMENTS PROPOSED IN FY07 AND APPROVED IN FY08

Revision 17.0 was submitted to NMED on March 13, 2007, and was approved on June 26, 2008. The purpose of this revision request was to reflect changes in the mixed low-level waste inventories in the LANL CPV of the STP, as described in the Fiscal Year 2006 STP Annual Update. The STP covered waste inventory increased with the addition of newly covered waste during FY07, and decreased with shipments for treatment, recycle or disposal of covered wastes during FY07.

TABLE 2.1 A: EXPEDITED SHIPMENT LETTERS

Request for Expedited Shipment Letter Date	STP Section	MWIR Waste ID	Treatability Group	Volume Proposed to be Shipped (m3)
11/27/2006	3.2	LA-W924	Lead Wastes	0.2271
5/22/2007	3.2	LA-W924	Lead Wastes	0.4164

LANL asked for expedited shipment of "Lead Wastes" MWIR Waste ID LA-W924 waste items to be included in Revision 18 in a letter to NMED dated November 27, 2006.

LANL asked for expedited shipment of "Lead Wastes" MWIR Waste ID LA-W924 waste items to be included in Revision 18 in a letter to NMED dated May 22, 2007.

TABLE 2.1 B: FY07 CORRESPONDENCE

Letter Date	Description	Letter number
11/27/2006	Request for expedited shipment	ENV-RCRA:06-108
1/19/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-013

Letter Date	Description	Letter number
<u>2/23/2007</u>	<u>Proposed Administrative Adjustments</u>	<u>ENV-RCRA: 07-032</u>
<u>3/13/2007</u>	<u>STP FY06 Update transmittal letter</u>	<u>ENV-RCRA: 07-043</u>
<u>4/12/2007</u>	<u>Notice of completion of off-site waste shipment</u>	<u>ENV-RCRA: 07-063</u>
4/20/2007	Correction on Notice of completion of off-site waste shipment	ENV-RCRA: 07-068
5/22/2007	Request for expedited shipment	ENV-RCRA: 07-116
6/26/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-161
7/2/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-166
7/25/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-177
<u>10/2/2007</u>	<u>FY06 STP Revision 17 Milestone Date Extension Request</u>	<u>ENV-RCRA: 07-235</u>
11/5/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-254
<u>11/13/2007</u>	<u>Response to 10/5/07 Notice of Disapproval</u>	<u>ENV-RCRA: 07-256</u>
12/11/2007	Request for Extension for LANL STP	ENV-RCRA: 07-273
<u>3/11/2008</u>	<u>LANL Proposed New STP 10-100 nCi/g Treatability Group</u>	<u>ENV-RCRA: 08-055</u>
<u>3/20/2008</u>	<u>Correction on Notice of completion of off-site waste shipment</u>	<u>ENV-RCRA: 08-061</u>
<u>3/20/2008</u>	<u>Correction on Notice of completion of off-site waste shipment</u>	<u>ENV-RCRA: 08-062</u>
<u>3/20/2008</u>	<u>Notice of completion of off-site waste shipment</u>	<u>ENV-RCRA: 08-063</u>
<u>4/1/2008</u>	<u>Email from A. Dye to R. Kay, Subject: Clarification for the Administrative Record</u>	<u>NA</u>
<u>4/18/2008</u>	<u>Mixed TRU Waste Tracking</u>	<u>ENV-RCRA: 08-77</u>
<u>4/21/2008</u>	<u>Request for Extension to Submit FY07 STP Update</u>	<u>ENV-RCRA: 08-79</u>
<u>4/23/2008</u>	<u>Proposed Administrative Adjustments</u>	<u>ENV-RCRA: 08-084</u>
<u>5/8/2008</u>	<u>Response to NMED Notice of Noncompliance</u>	<u>ENV-RCRA: 08-091</u>
<u>6/23/2008</u>	<u>Request for Extension of Milestone Compliance Activity Dates</u>	<u>ENV-RCRA:08-118</u>
<u>7/8/2008</u>	<u>LANL STP FY07 Revision 18 Modified pages</u>	<u>ENV-RCRA:08-141</u>

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 18.0. 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 FY07 *Background Volume Update* and in *Revision Proposal 18.0*.

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 18.0. These additions consist of waste that was placed in storage during FY06 and were proposed to become covered waste in FY07. 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 FY07 *Background Volume Update* and in *Revision Proposal 18.0*.

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 18.0.

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 2006 update and Revision 17.0 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 13, 2007.
3. *Approval with Modifications of the Proposed Revision 17.0, Annual Update to Site Treatment Plan, Federal Facilities Compliance Order Los Alamos National Laboratory EPA ID #NM0890010515 LANL-07-019,* to Albert Dye, Los Alamos National Laboratory STP Project Manager and Dave D. Stewart, Department of Energy LASO Interim Waste Management Program Manager, June 26, 2008.

Date Shipped	Destination	MWIR #	Treatability Group	Vol. (m ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
5/21/2007	Perma-Fix	LA-W933	Lab Packs	0.2082	000363835 JJK	6/26/2007	3.2
6/4/2007	ESI	LA-W924	Lead Wastes	0.8896	000363858 JJK	7/2/2007	3.2
6/20/2007	MEC	LA- W935W93 4	High Activity Waste+0- 100 nCi/g Waste	4.3722	000363867 JJK	7/25/2007	3.3.42
9/25/2007	MEC	LA- W935W93 4	High Activity Waste+0- 100 nCi/g Waste	16.656	000365526 JJK	11/5/2007	3.3.42
9/27/2007	Perma-Fix	LA- W935W93 4	High Activity Waste+0- 100 nCi/g Waste	33.1038	000365528 JJK	11/5/2007	3.3.42
9/27/2007	Perma-Fix	LA- W935W93 4	High Activity Waste+0- 100 nCi/g Waste	18.3216	00365529 JJK	11/5/2007	3.3.42
Total Volume				74.3993			

Table X.C.2.a.-3: FY07 STP MLLW Off-Site Shipments for Recycling

Date Shipped	Destination	MWIR #	Treatability Group	Vol (m ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
Total Volume				0.00			

Table X.C.2.a.- 4: FY07STP MLLW On-Site Treatment

MWIR #	Treatability Group	Vol (m ³)	Date NMED Notified	CPV Section
Total Volume		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 ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
Total Volume				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 ³)	Comments	CPV Section
LA-W918	<i>Compressed Gases Requiring Oxidation</i>	-0.0004	Volume Correction	3.1.9
LA-W925	<i>Mercury Wastes – TBD</i>	-0.3398	Volume Correction (container volume double counted)	3.2
LA-W934	<i>High Activity Waste</i>	0.4164	Transfer from mixed TRU inventory	3.2
LA-W935 W934	High Activity 10–100 nCi/g Waste	85.5702	Transfer from mixed TRU inventory	3.3.4 3.2
<u>LA-W934</u>	<u>High Activity g Waste</u>	<u>-13.1166</u>	<u>Transfer to LA-W935</u>	<u>3.2</u>
<u>LA-W935</u>	<u>10 – 100 nCi/g Waste</u>	<u>13.1166</u>	<u>Transfer from LA-W934</u>	<u>3.3.4</u>
<i>Net Total</i>		85.6464		

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

Milestone Activity	Treatability Group	Revision 17 Compliance Date	Proposed Extended Compliance Date	Rationale for Extension
3.1.5(A)	<i>LA-W922 Noncombustible Debris</i>	08/25/2003	12/31/09	<i>An extension of this Compliance Date is requested to secure offsite treatment and to complete shipment of this waste stream.</i>
3.1.8(A)	<i>LA-W917 Compressed Gases Requiring Scrubbing</i>	08/0928/2008	08/28/2009	An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream.
3.1.9(A)	<i>LA-W918 Compressed Gases Requiring Oxidation</i>	08/0928/2008	08/28/2009	An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream.
3.1.11(A)	<i>LA-W908 Nonhalogenated Organic Liquids</i>	12/31/2007	12/31/2009	An extension of this Compliance Date is requested to secure offsite treatment and to complete shipment of this waste stream newly generated in FY07.
3.2(J)	<i>LA-W934 High Activity Wastes LA-W925 Mercury Wastes LA-W933 Lab Packs LA-W924 Lead Wastes</i>	12/31/2008	12/31/2010	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, some treatability groups includes waste stream items newly generated in FY07.

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

Addition of newly covered waste

The increases in covered waste inventory as of the end of FY07 are attributed primarily to waste that was newly generated in FY06 which was not treated within 12 months of generation, thereby becoming covered waste during FY07. Approval of these proposed additions to the STP inventory will allow the added covered wastes to be treated or otherwise managed in accordance with the activities and compliance dates pertaining to each treatability group, as adopted or revised herein.

Deletion of covered waste

The decreases in covered waste inventory reflect the treatment and disposal or recycling of covered waste at off-site commercial facilities, or the participation in treatability studies during FY07. Deletion of this covered waste is proposed in order to more accurately reflect the LANL STP inventory as of the end of FY07.

STP Background Volume
Attachment A

Los Alamos National Laboratory

Federal Facility Compliance Order

*Annual Site Treatment Plan Update
for Fiscal Year 2007*

Background Volume

LA-UR-08-2612

May 1, 2008

Los Alamos

NATIONAL LABORATORY

**FY07 Annual STP Update
Background Volume**

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Appendix E: Reported STP MLLW Inventories FY99 Update and Revision 10.0 Final

Appendix F: Reported STP MLLW Inventories FY00 Updated and Revision 11.0

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ACRONYMS

BV	Background Volume
CCA	Compliance Certification Application
40 CFR	Title 40 of the Code of Federal Regulations
CMR	Chemical and Metallurgic Research
CPV	Compliance Plan Volume
DOE	Department of Energy
DSSI	Diversified Scientific Services, Inc.
EPA	Environmental Protection Agency
ESI	EnergySolutions, Inc.
FFCO	Federal Facility Compliance Order
FR	Federal Register
FY	Fiscal Year
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
LDR	Land Disposal Restrictions (RCRA)
LWAA	Land Withdrawal Act Amendments
M&EC	Materials and Energy Corporation
MLLW	Mixed Low-Level Waste
MTRU	Mixed Transuranic
MWIR	Mixed Waste Inventory Report
NMED	New Mexico Environment Department
ORNL	Oak Ridge National Laboratory
PCB	Polychlorinated Biphenyl
RCRA	Resource Conservation and Recovery Act
STP	Site Treatment Plan
TA	Technical Area
TBV	To be verified
TRU	Transuranic
UC	University of California
UTS	Universal Treatment Standards
WIPP	Waste Isolation Pilot Plant

1.0 INTRODUCTION

On October 4, 1995, the New Mexico Environment Department (NMED) issued a Federal Facility Compliance Order (FFCO) to the Department of Energy (DOE) and its then management and operating contractor, the University of California (UC) Regents. The FFCO required Los Alamos National Laboratory (LANL) to implement the Site Treatment Plan (STP) for the treatment of mixed waste at LANL. The STP was written to address treatment capacities and technologies to treat all of LANL's mixed waste, regardless of the time it was generated. Section VII of the FFCO requires LANL to submit an Annual Site Treatment Plan Update to the NMED each year on or before March 31. On June 1, 2006 Los Alamos National Security, LLC (LANS) replaced UC as operating contractor of LANL at which time LANS assumed responsibility for compliance with the FFCO.

The STP contains two volumes, the Compliance Plan Volume (CPV) and the Background Volume (BV). The FFCO requires the Annual Update bring information in both volumes current to the end of the previous federal fiscal year (FY). The update to the BV provides the following information:

- The amount of each covered waste stored at LANL as follows: 1) the estimated volume in storage at the end of the previous fiscal year; and 2) the estimated volume anticipated to be placed in storage for the next five fiscal years;
- A progress report from the end of the previous federal fiscal year describing treatment progress and treatment technology development for each treatment facility and activity scheduled in the STP; a description, if applicable, of current or anticipated alternative treatment technology that is being evaluated for use instead of treatment technologies or capacities identified in the STP;
- A description of DOE's funding for STP-related activities and any funding issues that may affect the schedule;
- The status of the "No-Migration Variance Petition" or any treatability variances; and
- A progress report on characterization and/or treatment capabilities or plans for mixed transuranic waste (MTRU) related to the waste treatment standards, if any, for the DOE Waste Isolation Pilot Plant (WIPP) facility near Carlsbad, New Mexico.

This document constitutes the FY07 update to the BV.

2.0 AMOUNT OF EACH COVERED WASTE STORED AT LANL

2.1 MIXED LOW LEVEL WASTE (MLLW) INVENTORY

During FY07, MLLW covered inventories increased from approximately 4.11 m³ to 56.02 m³. Table 2.1-1 summarizes changes to the estimated MLLW covered waste inventory for FY07. A total of 40.66 m³ of newly generated waste became covered during FY07 and 74.40 m³ of covered waste was treated, recycled, or disposed during the fiscal year. Each item in the MLLW covered waste inventory is verified during quality control activities for individual shipments for treatment and disposal or recycling. Inconsistencies may exist in treatability groups between the

original inventory reported when compared to actual shipments. These inconsistencies are reconciled annually, with the STP update, under Administrative Adjustments.

TABLE 2.1-1: FY07 MLLW Inventory Summary

Contribution	Volume (M3)
Estimated MLLW Inventory Reported in FY06 Annual Update	4.112
Proposed Revision 17.0	
Newly Generated Covered Waste	40.66
Off-site Treatment	(74.40)
Off-site Recycle	(0.00)
On-site Decontamination	(0.00)
Treatability Study Use	(0.00)
Administrative Adjustments	85.6464
Proposed Deletion under FFCO Section V.B.	0.00
Estimated MLLW Inventory Reported in FY07 Annual Update	56.02

Table 2.1-2 below provides the detailed FY07 covered MLLW inventory changes by treatability group. Newly generated waste is waste that was generated in FY06 and became covered waste in FY07.

TABLE 2.1-2: FY07 MLLW Inventory Detailed Update by Treatability Group

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.1.1	LA-W901 IPA Wastes	0	0		0	0
3.1.1	LA-W902 Scintillation Fluids	0	0		0	0
3.1.2	LA-W903 Lead Blankets	0	0		0	0
3.1.2	LA-W904 Soil with Heavy Metals	0	0		0	0
3.1.2	LA-W905 ER Soils	0	0		0	0
3.1.3	LA-W906 Aqueous Organic Liquids	0	0		0	0

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CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	0	0		0	0
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	0	0		0	0
3.1.5	LA-W912 Combustible Debris	0	0		0	0
3.1.5	LA-W921 Activated or Inseparable Lead	0	0		0	0
3.1.5	LA-W922 Noncombustible Debris	0.0015	0		0.0015	2
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0	0		0	0
3.1.6	LA-W914 Corrosive Solutions	0	0		0	0
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0	0		0	0
3.1.7	LA-W916 Water-Reactive Wastes	0	0		0	0
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.0080	0		0.0080	0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.0758	-0.0152 -0.0004	Shipped to M&EC 5/21/07 Administrative Adjustment	0.0602	0
3.1.10	LA-W920 Elemental Mercury	0.0009	-0.0009	Shipped to M&EC 3/5/07	0	0
3.1.11	LA-W907 Halogenated Organic Liquids	0	0		0	0
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0	0.0009	Newly Generated	.0009	0
3.1.11	LA-W909 Bulk Oils	0.0568	-0.0568	Shipped to PermaFix 3/5/07	0	0

**FY07 Annual STP Update
Background Volume**

05/1/2008

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.1.11	LA-W910 PCB Wastes with RCRA Components	0	0		0	
3.1.11	LA-W923 Liquid and Solid Oxidizers	0	0		0	0
3.2	LA-W924 Lead Wastes – TBD	0.7003	-0.2271 -0.4732 0.4164 -0.4164	Shipped to ESI 12/18/06 Shipped to ESI 6/4/07 Newly Generated Newly Generated Shipped to ESI 6/4/07	0	
3.2	LA-W925 Mercury Wastes – TBD	1.3231	-0.3398 0.0379 -0.3398	Shipped to M&EC 3/5/07 Newly Generated Administrative Adjustment	0.6814	1.5
3.2	LA-W926 Compressed Gases – TBD	0	0		0	0
3.2	LA-W927 Biochemical Laboratory Wastes	0	0		0	0
3.2	LA-W928 Dewatered Treatment Sludge	0	0		0	0
3.2	LA-W932 Explosives	0	0		0	
3.2	LA-W933 Lab Packs	0.4164	-0.2082 -0.2082	Shipped to Perma-Fix 5/21/07 Shipped to DSSI 5/21/07	0	2
3.2	LA-W934 High Activity Waste	1.5296	0.4164 40.2046 85.5702 -4.3722 -16.656 -51.4254 -13.1166	Administrative Adjustment (Transfer from covered MTRU Inventory) Newly Generated Administrative Adjustment (Transfer from covered MTRU Inventory) Shipped to M&EC 6/20/07 Shipped to M&EC 9/25/07 Shipped to M&EC 9/27/07 Administrative Adjustment (Transfer to LA-W935)	42.1506	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0	0		0	0

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY06 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY13 (m3)
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0	0		0	0
3.3.3	LA-W931 Lead Requiring Sorting	0	0		0	0
3.3.4	LA-W935 10-100 nCi/g waste	NA	13.1166	Administrative Adjustment (Transfer from LA-W934)	13.1166	251
3.4	Missing/ nonexistent/ TBV category	0	0		0	N/A
TOTALS		4.1124	51.9068		56.0192	

2.2 MIXED TRANSURANIC (MTRU) INVENTORY SUMMARY

During FY07, MTRU covered inventories decreased from approximately 4104 m³ to 3845 m³. Table 2.2-1 summarizes changes to the estimated MTRU covered waste inventory for FY07.

Table 2.2-1: Covered MTRU Inventory Summary

Description	Volume (M3)
Covered MTRU Inventory Reported in FY06	4104.4
Covered MTRU Waste to WIPP	(265.6)
Reclassified as MLLW	(69.8)
New Covered MTRU Waste	30.2
CMR and TA-55 Covered MTRU Waste	45.5
Covered MTRU Inventory At End of FY07	3845

The estimated covered MTRU waste inventory at LANL is described by treatability group in Table 2.2-2 below. This table presents the estimated volume of covered MTRU waste for each treatability group.

TABLE 2.2-2. FY07 Estimated Covered MTRU Inventory by Treatability Group

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
Cemented Sludge	1685	-2.912	Shipped to WIPP 10/11/06	1550	
		-1.456	Shipped to WIPP 10/13/06		
		-1.04	Shipped to WIPP 11/01/06		
		-2.912	Shipped to WIPP 11/30/06		
		-1.456	Shipped to WIPP 01/17/07		
		-2.704	Shipped to WIPP 01/18/07		
		-0.624	Shipped to WIPP 01/26/07		
		-1.248	Shipped to WIPP 03/06/07		
		-1.456	Shipped to WIPP 03/07/07		
		-1.456	Shipped to WIPP 03/08/07		
		-1.456	Shipped to WIPP 03/09/07		
		-1.456	Shipped to WIPP 03/14/07		
		-1.456	Shipped to WIPP 03/15/07		
		-1.456	Shipped to WIPP 03/16/07		
		-1.456	Shipped to WIPP 03/21/07		
		-1.456	Shipped to WIPP 03/22/07		
		-1.456	Shipped to WIPP 03/23/07		
		-1.456	Shipped to WIPP 03/28/07		
		-1.456	Shipped to WIPP 03/29/07		
		-2.496	Shipped to WIPP 04/02/07		
		-2.704	Shipped to WIPP 04/03/07		
		-2.704	Shipped to WIPP 04/04/07		
		-2.704	Shipped to WIPP 04/11/07		
		-2.288	Shipped to WIPP 04/12/07		

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-2.496	Shipped to WIPP 04/13/07		
		-2.496	Shipped to WIPP 04/18/07		
		-2.496	Shipped to WIPP 04/19/07		
		-2.496	Shipped to WIPP 04/20/07		
		-2.288	Shipped to WIPP 04/25/07		
		-2.496	Shipped to WIPP 04/26/07		
		-2.496	Shipped to WIPP 04/27/07		
		-2.496	Shipped to WIPP 05/02/07		
		-2.288	Shipped to WIPP 05/03/07		
		-2.496	Shipped to WIPP 05/04/07		
		-2.496	Shipped to WIPP 05/17/07		
		-2.288	Shipped to WIPP 05/18/07		
		-1.456	Shipped to WIPP 05/31/07		
		-1.456	Shipped to WIPP 06/01/07		
		-1.456	Shipped to WIPP 06/05/07		
		-1.456	Shipped to WIPP 06/06/07		
		-1.456	Shipped to WIPP 06/07/07		
		-1.456	Shipped to WIPP 06/12/07		
		-1.456	Shipped to WIPP 06/13/07		
		-1.456	Shipped to WIPP 06/14/07		
		-1.456	Shipped to WIPP 06/19/07		
		-1.248	Shipped to WIPP 06/20/07		
		-1.456	Shipped to WIPP 06/27/07		
		-1.5695	Shipped to WIPP 06/28/07		
		-1.456	Shipped to WIPP 07/02/07		
		-1.456	Shipped to WIPP 07/05/07		
		-0.624	Shipped to WIPP 07/06/07		
		-37.55	Reclassified as MLLW		
		-1.248	Idaho CCP characterization 8/10/07		
Combustible /Noncombustible	1942	27.9	Newly Generated	1821	
		-1.248	Shipped to WIPP 10/04/06		

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Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-0.416	Shipped to WIPP 10/11/06		
		-0.624	Shipped to WIPP 10/11/06		
		-1.04	Shipped to WIPP 10/13/06		
		-0.208	Shipped to WIPP 10/20/06		
		-1.248	Shipped to WIPP 10/25/06		
		-1.664	Shipped to WIPP 10/26/06		
		-1.04	Shipped to WIPP 11/01/06		
		-1.456	Shipped to WIPP 11/02/06		
		-0.832	Shipped to WIPP 11/08/06		
		-0.416	Shipped to WIPP 11/08/06		
		-0.624	Shipped to WIPP 11/09/06		
		-0.624	Shipped to WIPP 11/09/06		
		-3.328	Shipped to WIPP 11/16/06		
		-0.832	Shipped to WIPP 11/30/06		
		-1.456	Shipped to WIPP 12/01/06		
		-4.784	Shipped to WIPP 12/06/06		
		-3.744	Shipped to WIPP 12/08/06		
		-0.832	Shipped to WIPP 12/13/06		
		-0.416	Shipped to WIPP 12/15/06		
		-1.04	Shipped to WIPP 01/04/07		
		-1.664	Shipped to WIPP 01/10/07		
		-1.04	Shipped to WIPP 01/10/07		
		-0.624	Shipped to WIPP 01/17/07		
		-1.456	Shipped to WIPP 01/18/07		
		-0.624	Shipped to WIPP 01/18/07		
		-2.912	Shipped to WIPP 01/24/07		
		-1.04	Shipped to WIPP 01/25/07		
		-1.456	Shipped to WIPP 01/26/07		
		-0.416	Newly Covered Shipped to WIPP 01/26/07		
		-1.248	Shipped to WIPP 02/01/07		
		-0.832	Shipped to WIPP 02/03/07		

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-1.456	Shipped to WIPP 02/07/07		
		-1.456	Shipped to WIPP 02/08/07		
		-1.872	Shipped to WIPP 02/09/07		
		-0.208	Newly Covered Shipped to WIPP 02/09/07		
		-1.248	Shipped to WIPP 02/16/07		
		-1.04	Shipped to WIPP 02/21/07		
		-1.456	Shipped to WIPP 02/22/07		
		-1.04	Shipped to WIPP 02/27/07		
		-2.912	Shipped to WIPP 03/01/07		
		-1.248	Shipped to WIPP 03/02/07		
		-0.416	Shipped to WIPP 03/06/07		
		-0.208	Newly Covered Shipped to WIPP 03/06/07		
		-0.208	Shipped to WIPP 03/07/07		
		-0.416	Shipped to WIPP 03/08/07		
		-0.832	Shipped to WIPP 03/09/07		
		-1.664	Shipped to WIPP 03/14/07		
		-0.624	Shipped to WIPP 03/15/07		
		-0.624	Shipped to WIPP 03/16/07		
		-0.624	Shipped to WIPP 03/21/07		
		-0.624	Shipped to WIPP 03/22/07		
		-1.456	Shipped to WIPP 03/23/07		
		-0.416	Shipped to WIPP 03/28/07		
		-0.208	Shipped to WIPP 03/28/07		
		-0.832	Shipped to WIPP 03/29/07		
		-0.416	Shipped to WIPP 03/29/07		
		-0.832	Shipped to WIPP 03/30/07		
		-1.04	Shipped to WIPP 04/02/07		
		-1.248	Shipped to WIPP 04/03/07		
		-0.208	Shipped to WIPP 04/04/07		
		-1.04	Shipped to WIPP 04/11/07		
		-0.208	Shipped to WIPP 04/12/07		

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Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-0.832	Shipped to WIPP 04/13/07		
		-0.208	Newly Covered Shipped to WIPP 04/13/07		
		-1.04	Shipped to WIPP 04/18/07		
		-0.208	Newly Covered Shipped to WIPP 04/18/07		
		-0.832	Shipped to WIPP 04/19/07		
		-0.832	Shipped to WIPP 04/20/07		
		-0.416	Shipped to WIPP 04/26/07		
		-0.624	Shipped to WIPP 04/27/07		
		-0.624	Shipped to WIPP 05/02/07		
		-0.208	Newly Covered Shipped to WIPP 05/02/07		
		-0.624	Shipped to WIPP 05/03/07		
		-0.416	Shipped to WIPP 05/04/07		
		-0.624	Shipped to WIPP 05/17/07		
		-0.832	Shipped to WIPP 05/18/07		
		-0.832	Shipped to WIPP 05/23/07		
		-1.248	Shipped to WIPP 05/24/07		
		-0.416	Shipped to WIPP 05/30/07		
		-0.624	Shipped to WIPP 05/31/07		
		-0.416	Shipped to WIPP 06/01/07		
		-0.208	Shipped to WIPP 06/05/07		
		-0.832	Shipped to WIPP 06/06/07		
		-1.248	Shipped to WIPP 06/07/07		
		-0.416	Shipped to WIPP 06/12/07		
		-0.624	Shipped to WIPP 06/13/07		
		-1.3615	Shipped to WIPP 06/14/07		
		-0.624	Shipped to WIPP 06/19/07		
		-0.416	Shipped to WIPP 06/20/07		
		-2.288	Shipped to WIPP 06/21/07		
		-1.04	Shipped to WIPP 06/26/07		
		-0.832	Shipped to WIPP 06/27/07		
		-1.248	Shipped to WIPP 06/28/07		

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-1.248	Shipped to WIPP 07/02/07		
		-0.832	Shipped to WIPP 07/05/07		
		-1.456	Shipped to WIPP 07/06/07		
		-1.04	Shipped to WIPP 07/10/07		
		-1.248	Shipped to WIPP 07/11/07		
		-0.208	Newly Covered Shipped to WIPP 07/11/07		
		-1.872	Shipped to WIPP 07/12/07		
		-1.248	Shipped to WIPP 07/17/07		
		-0.832	Shipped to WIPP 07/24/07		
		-1.456	Shipped to WIPP 07/25/07		
		-0.832	Shipped to WIPP 07/26/07		
		-1.248	Shipped to WIPP 07/31/07		
		-0.416	Newly Covered Shipped to WIPP 07/31/07		
		-1.456	Shipped to WIPP 08/01/07		
		-0.416	Newly Covered Shipped to WIPP 08/01/07		
		-1.664	Shipped to WIPP 08/02/07		
		-1.664	Shipped to WIPP 08/28/07		
		-4.368	Shipped to WIPP 08/29/07		
		-0.832	Newly Covered Shipped to WIPP 08/29/07		
		-1.664	Shipped to WIPP 09/04/07		
		-0.208	Newly Covered Shipped to WIPP 09/04/07		
		-2.704	Shipped to WIPP 09/05/07		
		-0.416	Newly Covered Shipped to WIPP 09/05/07		
		-0.624	Shipped to WIPP 09/10/07		
		-1.04	Shipped to WIPP 09/11/07		
		-0.624	Newly Covered Shipped to WIPP 09/11/07		
		-1.5695	Shipped to WIPP 09/12/07		
		-1.248	Shipped to WIPP 09/18/07		
		-1.664	Shipped to WIPP 09/19/07		

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Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-0.624	Newly Covered Shipped to WIPP 09/19/07		
		-0.832	Shipped to WIPP 09/20/07		
		-1.456	Shipped to WIPP 09/25/07		
		-0.832	Newly Covered Shipped to WIPP 09/25/07		
		-0.624	Shipped to WIPP 09/26/07		
		-0.624	Newly Covered Shipped to WIPP 09/26/07		
		-1.04	Shipped to WIPP 09/27/07		
		-20.59	Reclassified as MLLW		
Combustible	146	-0.416	Shipped to WIPP 10/13/06	102	
		-0.624	Shipped to WIPP 10/18/06		
		-0.624	Shipped to WIPP 10/20/06		
		-0.624	Shipped to WIPP 10/25/06		
		-0.832	Shipped to WIPP 11/01/06		
		-1.248	Shipped to WIPP 11/08/06		
		-0.208	Shipped to WIPP 11/09/06		
		-0.832	Shipped to WIPP 11/15/06		
		-1.04	Shipped to WIPP 11/17/06		
		-0.208	Shipped to WIPP 11/30/06		
		-0.416	Shipped to WIPP 12/01/06		
		-0.416	Shipped to WIPP 12/15/06		
		-0.208	Shipped to WIPP 01/17/07		
		-0.208	Shipped to WIPP 01/18/07		
		-0.416	Shipped to WIPP 01/18/07		
		-0.416	Shipped to WIPP 01/24/07		
		-0.832	Shipped to WIPP 01/25/07		
		-0.624	Shipped to WIPP 01/26/07		
		-0.416	Shipped to WIPP 02/01/07		
		-1.04	Shipped to WIPP 02/03/07		
		-0.416	Shipped to WIPP 02/07/07		
		-0.208	Shipped to WIPP 02/08/07		
		-0.624	Shipped to WIPP 02/09/07		

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-0.624	Shipped to WIPP 02/16/07		
		-0.208	Shipped to WIPP 02/22/07		
		-0.208	Shipped to WIPP 02/27/07		
		-0.624	Shipped to WIPP 03/01/07		
		-0.624	Shipped to WIPP 03/02/07		
		-0.416	Shipped to WIPP 03/07/07		
		-0.624	Shipped to WIPP 03/08/07		
		-0.624	Shipped to WIPP 03/09/07		
		-0.208	Shipped to WIPP 03/14/07		
		-0.624	Shipped to WIPP 03/15/07		
		-0.208	Shipped to WIPP 03/16/07		
		-0.416	Shipped to WIPP 03/21/07		
		-0.208	Shipped to WIPP 03/22/07		
		-0.208	Shipped to WIPP 03/23/07		
		-0.416	Shipped to WIPP 03/28/07		
		-0.208	Shipped to WIPP 03/28/07		
		-0.208	Shipped to WIPP 03/29/07		
		-0.416	Shipped to WIPP 03/30/07		
		-0.416	Shipped to WIPP 04/02/07		
		-0.208	Shipped to WIPP 04/03/07		
		-0.208	Shipped to WIPP 05/24/07		
		-1.04	Shipped to WIPP 05/30/07		
		-0.208	Shipped to WIPP 05/31/07		
		-0.208	Shipped to WIPP 06/06/07		
		-0.624	Shipped to WIPP 06/07/07		
		-0.832	Shipped to WIPP 06/12/07		
		-0.208	Shipped to WIPP 06/13/07		
		-0.416	Shipped to WIPP 06/19/07		
		-0.416	Shipped to WIPP 06/20/07		
		-0.624	Shipped to WIPP 06/21/07		
		-1.04	Shipped to WIPP 06/27/07		
		-0.416	Shipped to WIPP 06/28/07		

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Background Volume**

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Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-0.416	Shipped to WIPP 07/02/07		
		-1.04	Shipped to WIPP 07/05/07		
		-0.208	Shipped to WIPP 07/10/07		
		-0.208	Shipped to WIPP 07/11/07		
		-0.208	Shipped to WIPP 07/12/07		
		-0.208	Shipped to WIPP 07/17/07		
		-0.208	Shipped to WIPP 07/31/07		
		-0.416	Shipped to WIPP 08/02/07		
		-0.208	Shipped to WIPP 08/28/07		
		-0.832	Shipped to WIPP 08/29/07		
		-0.416	Shipped to WIPP 09/04/07		
		-0.832	Shipped to WIPP 09/05/07		
		-0.624	Shipped to WIPP 09/10/07		
		-0.832	Shipped to WIPP 09/11/07		
		-0.208	Shipped to WIPP 09/12/07		
		-0.832	Shipped to WIPP 09/20/07		
		-0.208	Shipped to WIPP 09/26/07		
		-0.416	Shipped to WIPP 09/27/07		
		-8.53	Reclassified as MLLW		
Glass waste	1.9	-0.208	Reclassified as MLLW	1.7	
Leaded Glovebox	17.6	-0.208	Shipped to WIPP 05/31/07	16.1	
		-0.208	Shipped to WIPP 06/01/07		
		-0.624	Shipped to WIPP 07/11/07		
		-0.208	Shipped to WIPP 07/25/07		
		-0.208	Shipped to WIPP 09/10/07		
Metallic waste	68.9	-0.416	Shipped to WIPP 10/18/06	63.9	
		-0.208	Shipped to WIPP 11/01/06		
		-0.416	Shipped to WIPP 12/06/06		
		-0.208	Shipped to WIPP 12/08/06		
		-0.208	Shipped to WIPP 01/25/07		
		-0.208	Shipped to WIPP 02/08/07		

**FY07Annual STP Update
Background Volume**

05/1/2008

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY08-FY12 (m3)
		-0.208 -0.208 -0.208 -0.208 -0.208 -2.50	Shipped to WIPP 03/15/07 Shipped to WIPP 07/05/07 Shipped to WIPP 09/12/07 Shipped to WIPP 09/18/07 Shipped to WIPP 09/27/07 Reclassified as MLLW		
Non-combustible Waste	83.0	-0.208 -0.208 -0.416 -0.62	Shipped to WIPP 11/08/06 Shipped to WIPP 07/11/07 Shipped to WIPP 09/27/07 Reclassified as MLLW	81.6	
Solidified Inorganic And Organic Solids	159.4	2.3 -0.21	New Generated Idaho CCP characterization 8/10/07	161.5	
TOTAL	4098			3800	

3.0 TREATMENT PROGRESS

3.1 OFF-SITE TREATMENT

During FY07, covered mixed waste streams were shipped for treatment to off-site commercial treatment facilities such as EnergySolutions of Clive, Utah; DSSI in Kingston, TN; Perma-Fix in Gainesville, Florida and Material and Energy Corporation (M&EC) in Oak Ridge, Tennessee.

- **EnergySolutions**

EnergySolutions' (formerly Envirocare) Clive, Utah site is a Resource Conservation and Recovery Act (RCRA) facility that is licensed by the State of Utah and the Environmental Protection Agency (EPA) to receive, possess, use, treat, and dispose of mixed radioactive materials. EnergySolutions has a mixed waste treatment facility that incorporates treatment technologies designed to reduce the toxicity of waste materials prior to disposal. Current mixed waste treatment technologies used at EnergySolutions include stabilization, deactivation, neutralization, reduction/oxidation, chemical fixation, and polymer encapsulation. Disposal of the treated residue at EnergySolutions occurs after verification that the material meets applicable treatment standards.

- **Perma-Fix**

Perma-Fix of Gainesville, Florida is a RCRA permitted facility with a Radioactive Materials License for processing scintillation cocktail vials and other mixed waste fluids for blending and shipment to an energy recovery facility. Perma-Fix services include the decommissioning of labpacks, thermal treatment of organics, stabilization and solidification of inorganics, and distillation of halogenated organics. The facility also performs chemical treatments such as demulsification /precipitation/flocculation, solvent extraction, chelation, oxidation-reduction, ion exchange, absorption/adsorption, amalgamation, and chemical decontamination.

- **Material and Energy Corporation**

M&EC, located in the East Tennessee Technology Park in Oak Ridge, Tennessee, is a newly permitted treatment facility for low-level radioactive and mixed waste. The facility installed six treatment processes and has the capability of treating organic and inorganic mixed waste to meet the LDR criteria. These processes include stabilization/solidification, chemical extraction, chemical fixation, metals precipitation, neutralization, and debris treatment. M&EC became operational in September 2001.

- **Diversified Scientific Services, Inc. (DSSI)**

Diversified Scientific Services, Inc., was acquired by Perma-Fix Environmental Services in September 2000. Waste delivered to DSSI is thermally treated and the residue is disposed of at an appropriately licensed and permitted disposal facility. Through beneficial recovery of thermal energy, the waste that would otherwise be stored produces a useful product (electricity) while accomplishing a substantial waste reduction. DSSI is located in Kingston, Tennessee.

Table 3.1-1 below is a summary of LANL's off-site shipments for treatment and/or disposal of covered MLLW in FY07. A total volume of 74.4 cubic meters of STP waste was shipped off-site for treatment and/or disposal.

TABLE 3.1-1: FY07 STP MLLW Off-Site Shipments for Treatment and/or Disposal

Date Shipped	Destination	MWIR #	Treatability Group	Vol. (m ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
12/18/2006	ESI	LA-W924	Lead Wastes	0.2271	00036341 JJK	1/19/2007	3.1.11
3/5/2007	MEC	LA-W920	Elemental Mercury	0.0009	000363747 JJK	4/12/2007	3.1.10
3/5/2007	MEC	LA-W925	Mercury Wastes - TBD	0.3398	000363747 JJK	4/12/2007	3.2
3/5/2007	PermaFix	LA-W909	Bulk Oils	0.0568	000363746 JJK	4/12/2007	3.1.11
5/21/2007	DSSI	LA-W933	Lab Packs	0.2082	0000363836 JJK	6/26/2007	3.2
5/21/2007	MEC	LA-W918	Compressed Gases Requiring Oxidation	0.0151	000363827JJK	6/26/2007	3.1.9
5/21/2007	Perma-Fix	LA-W933	Lab Packs	0.2082	000363835 JJK	6/26/2007	3.2
6/4/2007	ESI	LA-W924	Lead Wastes	0.8896	000363858 JJK	7/2/2007	3.2
6/20/2007	MEC	LA-W934	High Activity Waste	4.3722	000363867 JJK	7/25/2007	3.3.4
9/25/2007	MEC	LA-W934	High Activity Waste	16.656	000365526 JJK	11/5/2007	3.3.4
9/27/2007	Perma-Fix	LA-W934	High Activityg Waste	33.1038	000365528 JJK	11/5/2007	3.3.4
9/27/2007	Perma-Fix	LA-W934	High Activity Waste	18.3216	00365529 JJK	11/5/2007	3.3.4
Total Volume				74.3993			

3.2 OFF-SITE RECYCLING

In FY07, DOE and LANS conducted no off-site recycling.

TABLE 3.2-1: FY07 STP MLLW Off-Site Shipments for Recycling

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

3.3 ON-SITE TREATMENT AND RECYCLING

In FY07, DOE and LANS conducted no on-site treatment or recycling.

TABLE 3.3-1: FY07 STP MLLW On-Site Treatment

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

3.4 ON-SITE LEAD DECONTAMINATION

No LANL covered MLLW was decontaminated on-site during FY07.

3.5 TREATABILITY STUDIES

In FY07, DOE and LANS conducted no treatability studies.

TABLE 3.5-1: FY07 STP MLLW Treatability Studies

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

3.6 ADMINISTRATIVE ADJUSTMENTS AND CORRECTIONS

Administrative adjustments and corrections are due to discrepancies found during quality control activities related to preparing waste for treatment, inventory, and disposal or when preparing for the STP Annual Update. These adjustments may result in additions of newly identified covered waste, transfers of waste to other treatability groups, or transfers of waste to the *missing/nonexistent/TBV* category of the STP. A thorough data quality review is conducted annually to compare shipment notifications with shipping manifests against database updates. The discrepancies in the following table were discovered when preparing the FY07 Annual Update to the STP.

TABLE 3.6-1: Administrative Adjustments and Corrections

MWIR Waste ID	Treatability Group	Volume (m ³)	Comments	CPV Section
LA-W918	<i>Compressed Gases Requiring Oxidation</i>	-0.0004	Excess Inventory Reported	3.1.9
LA-W925	<i>Mercury Wastes – TBD</i>	-0.3398	Duplicate volume for one container reported	3.2
LA-W934	<i>High Activity Waste</i>	0.4164	Transfer from covered MTRU Inventory	3.2
LA-W934	<i>High Activity Waste</i>	-13.1166	Transfer to LA-W935	3.2
LA-W934	<i>High Activity Waste</i>	85.5702	Transfer from covered MTRU Inventory	3.2
LA-W935	<i>10 – 100 nCi/g Waste</i>	13.1166	Transfer from LA-W934	3.3.4
	<i>Net Total</i>	85.6464		

3.7 OTHER TYPES OF MIXED WASTE ACTIVITIES

No other MLLW activities were performed.

4.0 TREATMENT TECHNOLOGY DEVELOPMENT

During FY07, the availability of commercial and federal facility off-site treatment and disposal capacity for MLLW remained stable. As a result of DOE's increasing reliance on commercial treatment/disposal for mixed wastes, nearly all funding for onsite technology development has been reprioritized to support off-site treatment and disposal of mixed wastes. DOE treatment technology development initiatives are generally limited to specific technologies or technology adaptations in response to specific needs that cannot be addressed through commercial facilities.

4.1 TREATMENT TECHNOLOGIES BEING EVALUATED

DOE and LANS continue to monitor the development of other potential treatment technologies that may become available in the future. Some of these technologies are being developed at LANL and at other DOE sites. Numerous other commercially developed treatment processes exist which have not been demonstrated on mixed wastes.

4.1.1 Off-Site Commercial Treatment Facilities

M&EC is licensed for a technology to treat mercury-contaminated waste using amalgamation. The treatment consists of mixing proprietary amalgamation agents with the waste until the process analysis shows that the mercury was fully reacted. When the amalgamation is complete, the wastes is stabilized and sampled. The resultant product is a waste form suitable for land disposal. This mercury treatment process will be evaluated once it becomes available for low-level mixed waste treatment pending approval of a permit modification request.

4.1.2 Off-Site DOE Treatment Facilities

LANS staff at LANL will continue to evaluate off-site DOE-operated treatment facilities for their appropriateness to treat LANL STP waste.

5.0 DOE FUNDING FOR STP-RELATED ACTIVITIES

Funding to implement the LANL STP for mixed waste during FY07 was sufficient to meet all compliance dates as required by the STP issued on October 4, 1995. As stated in previous updates to the STP, funding is no longer available for development of mobile treatment units at LANL, but funding was provided during FY98, FY99, FY00, FY01, FY02, FY03, FY04, FY05 and FY07 for shipment of mixed waste offsite for treatment and disposal at DOE and commercial facilities. Funding during FY08 is also sufficient to meet all compliance dates established in the STP for FY07. Should funding reductions occur that would affect STP compliance dates, the DOE and LANS will so notify the NMED to address compliance schedules and activities.

The DOE Assistant Secretary for Environmental Management has initiated a long-range plan for its cleanup and waste management activities, with a goal of accelerating clean-up progress as much as possible before 2006. The plan, *Accelerating Cleanup: Paths to Closure*, includes sections for the LANL site that address MLLW and Transuranic (TRU) wastes that are currently in storage (legacy waste). Current funding targets for waste management in the draft *LANL Accelerating Cleanup: Paths to Closure* plan should allow LANS Staff at LANL to continue to meet all compliance dates in the STP, but assume that MTRU waste is not required to be treated to meet LDR before shipment to WIPP for disposal, as provided for in the WIPP Land Withdrawal Act Amendments.

Beginning in FY99, all newly generated MLLW with a disposal path was planned to be treated and disposed within one year if a treatment/disposal capability was available for the waste. All MLLW placed into storage before FY99 is planned to be treated and disposed before the end of FY08.

6.0 TREATMENT VARIANCES

The RCRA allows certain case-by-case variances from LDR standards. Variances that may be sought under the RCRA relate to requests for substitution of an alternative treatment technology in place of the LDR-required treatment technology. This section discusses any potential treatment variances related to LANL's covered waste, as described below.

6.1 WIPP NO-MIGRATION VARIANCE PETITION/LANL WITHDRAWAL ACT AMENDMENTS

The WIPP is a DOE facility located near Carlsbad, New Mexico, as a repository for the TRU waste that was generated by the nation's defense-related activities. Some of the TRU waste contains hazardous waste constituents regulated under the RCRA.

The WIPP repository is considered to be a deep geologic repository rather than a shallow landfill. It is wholly sited 2,100 ft below the land surface in a salt bed. Because salt has the advantageous characteristic of slow plastic deformation, it is predicted that the salt will entomb the waste and seal it from the human environment, making potential release of hazardous constituents a low-probability event.

The Land Withdrawal Act Amendments of 1996 (LWAA) (PL 104-201, Section 3188) exempts waste designated by the Secretary of Energy for disposal at WIPP from RCRA's LDRs. Following passage of the LWAA, EPA terminated its review of the No-Migration Variance Petition, submitted by DOE to EPA in May 1995. EPA formalized its withdrawal by letter to George Dials, DOE/Carlsbad Area Office manager, dated December 29, 1997.

On October 29, 1996, DOE submitted its Compliance Certification Application (CCA) to EPA. The CCA is intended to demonstrate to EPA that WIPP meets the requirements of Title 40 of the Code of Federal Regulations (40 CFR) Part 191 and 40 CFR Part 194. On October 23, 1997, EPA announced its proposed decision to issue a certification of compliance, subject to a number of specified conditions and to a public comment period of 120 days. On May 18, 1998, EPA published in the Federal Register (63 FR 27354) its final rule certifying that WIPP will comply with the requirements of Subparts B and C of 40 CFR Part 191 and amending the WIPP compliance criteria in 40 CFR Part 194. The final rule became effective June 17, 1998. On March 25, 1999, WIPP received its first shipment of non-mixed (radioactive only) TRU waste from Los Alamos. Other facilities have also shipped non-mixed TRU waste to WIPP. The New Mexico Environment Department issued a hazardous waste permit for WIPP on October 27, 1999, authorizing the DOE to manage, store, and dispose of contact-handled TRU mixed waste at the facility.

6.2 OTHER TREATMENT VARIANCE (S)

No treatment variances were requested or granted in FY07.

7.0 WIPP FACILITY CAPABILITIES

As discussed above, the DOE is planning to dispose of its defense TRU waste, both mixed and nonhazardous, in its deep geologic depository at the WIPP near Carlsbad, New Mexico. This facility is a receiving and disposal facility, without the capability of routinely opening and repackaging waste. TRU waste will already be containerized when received at the WIPP facility. The WIPP facility is not a generator of TRU waste, and therefore will receive all of the waste in shipments from off-site.

7.1 CHARACTERIZATION CAPABILITIES AT WIPP

No capabilities for characterization of TRU waste or hazardous waste constituents regulated by the RCRA were developed at the WIPP facility. During the present fiscal year, DOE is planning to resubmit permit modification requests that would lay the groundwork to accelerate cleanup at sites with small quantities of TRU waste (6,000 drums or less). Under this plan, generator/storage sites would characterize their waste. The DOE originally submitted this permit modification in July 2000. After hearing stakeholder concerns, the DOE withdrew the modification request and has subsequently resubmitted in FY02.

7.2 MTRU TREATMENT CAPABILITIES AND PLANS

No capabilities for treatment of MTRU to meet the LDR standards were developed at the WIPP facility. As described above, the LWAA exempted wastes designated by the Secretary of Energy for disposal at the WIPP from this requirement.

8.0 REFERENCES

1. "Federal Facility Compliance Order (Los Alamos National Laboratory)" New Mexico Environment Department (October 4, 1995)
2. "Hazardous Waste Report for Los Alamos National Laboratory" Volumes I and II, ESH-19, Los Alamos National Laboratory (February 1996)
3. "Transuranic Waste Baseline Inventory Report Revision 3", US Department of Energy, Carlsbad Area Office (December 1995)
4. "AL Mixed Waste Treatment Plan", Los Alamos National Laboratory (March 1994)
5. Congress, 1996. Text of Public Law 104-201, Congressional Record dated September 23, 1996, Amendment to Public Law 102-579, 1992 Waste Isolation Pilot Plant Land Withdrawal Act (106 Stat. 4777)
6. "Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 1995" (March 1996).
7. "Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 1996" (March 1997).
8. "Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 1997" (March 1998).
9. "Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 1998" (March 1999).
10. "Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 1999" (December 1999).
11. "Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 10.0" (August 2000).
12. "Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 11.0" (April 2001)
13. 40 CFR Part 194, Criteria for the Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal Regulations: Certification Decision; Proposed Rule" (Federal Register V.62, No. 210, Oct. 30 1997, pp. 58792-58838)
14. "Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 12.0" (March 2002)
15. Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 13.0" (March 2003)
16. Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 14.0" (March 2004)
17. Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 15.0" (March 2005)

18. *Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 16.0" (March 2006)*
19. *Los Alamos National Laboratory Federal Facility Compliance Order, Site Treatment Plan, Revision 17.0" (March 2007)*

**Appendix A
Reported STP MLLW Inventories 1995-1996**

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Appendix A – Reported Inventories, 1995 – 1996 (from Table 2-1, LANL FY96 Annual Update)

CPV Sec.	MWIR Waste ID and Treatability Group	CPV Vol (m ³)	FY95 Changes Covered Waste (m ³) ^a	Explanation for FY95 Change	Covered Vol. End of FY95 (m ³)	FY96 Changes Covered Waste (m ³) ^b	Comments	Covered Vol. End of FY96 (m ³)	Projection FY97-FY01 (m ³)
3.1.1	LA-W901 IPA Wastes	15.89	NC		15.89	Increased 4.07 ^d Decreased 19.98	Waste volume incorrectly reported in original STP inventory Shipped off-site for treatment at commercial or DOE facilities during FY96	0.02	0.0
3.1.1	LA-W902 Scintillation Fluids	2.47	Decreased 2.24	Commercially treated in FY95	0.23	Increased 0.13 ^d Decreased 0.36 ^d	Waste volume incorrectly reported in original STP inventory Shipped off-site for treatment at commercial or DOE facilities during FY96	0.0038 ^d	0.0
3.1.2	LA-W903 Lead Blankets	0.74	NC		0.74	Decreased 0.74	Shipped off-site for treatment at commercial facility during FY96	0.00	0.0
3.1.2	LA-W904 Soil with Heavy Metals	10.53	NC		10.53	Increased 0.11	Waste that was newly generated in FY95 that became covered waste in FY96	10.64	0.5
3.1.2	LA-W905 ER Soils	39.32	NC		39.32	Decreased 39.32	Shipped off-site for treatment or disposal at commercial facility during FY96	0.00	0.0
3.1.3	LA-W906 Aqueous Organic Liquids	1.65	Increased 0.43	Inadvertently omitted from STP	2.08	Increased 3.62	Waste that was newly generated in FY95 that became covered waste in FY96	5.70	18.1
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	28.32	Decreased 0.11 Increased 0.17	Treated in treatability study in FY95 Inadvertently omitted from STP	28.38	Increased 5.24 Decreased 0.11	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY96	33.51	26.2
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	7.82	Decreased 0.11 Increased 0.001	Treated in treatability study in FY95 Inadvertently omitted from STP	7.71	Increased 9.58	Waste that was newly generated in FY95 that became covered waste in FY96	17.29	47.9
3.1.5	LA-W912 Combustible Debris	13.82	NC		13.82	Increased 0.28	Waste that was newly generated in FY95 that became covered waste in FY96	14.10	1.4
3.1.5	LA-W921 Activated or Inseparable Lead	15.60	Decreased 7.42 Increased 10.11	Decontaminated and released in FY95 Received from LD200 effort	18.29	Increased 2.29 Decreased 12.45	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for off-site treatment at commercial facility during FY96	8.13	11.5
3.1.5	LA-W922 Noncombustible Debris	5.62	Decreased 0.0002 Increased 1.25	Treated in treatability study in FY95 Inadvertently	6.87	Increased 21.04	Waste that was newly generated in FY95 that became covered waste in FY96	27.91	105.2

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CPV Sec.	MWIR Waste ID and Treatability Group	CPV Vol (m ³)	FY95 Changes Covered Waste (m ³) ^a	Explanation for FY95 Change	Covered Vol. End of FY95 (m ³)	FY96 Changes Covered Waste (m ³) ^b	Comments	Covered Vol. End of FY96 (m ³)	Projection FY97-FY01 (m ³)
				omitted from STP					
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	1.85	NC		1.85	Increased 0.15 Decreased 0.030 Decreased 0.32	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY95 Shipped for treatment in on-site treatability study during FY96	1.65	0.8
3.1.6	LA-W914 Corrosive Solutions	1.36	Increased 0.04	Inadvertently omitted from STP	1.40	Increased 0.08 Decreased 0.67	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY96	0.81	0.4
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.13	Decreased 0.0003 Increased 0.02	Treated in treatability study in FY95 Inadvertently omitted from STP	0.15	Increased 0.02 Decreased 0.0002 Decreased 0.0031	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY95 Shipped for treatment in on-site treatability study during FY96	0.17	0.1
3.1.7	LA-W916 Water-Reactive Wastes	6.03	Increased 0.02	Inadvertently omitted from STP	6.05	Increased 0.01	Waste that was newly generated in FY95 that became covered waste in FY96	6.06	0.05
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35	NC		0.35	NC		0.35	0.0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.08	NC		0.08	Increased 0.01	Waste that was newly generated in FY95 that became covered waste in FY96	0.09	0.0
3.1.10	LA-W920 Elemental Mercury	0.50	NC		0.50	Increased 0.02	Waste that was newly generated in FY95 that became covered waste in FY96	0.52	0.1
3.2.1	LA-W907 Halogenated Organic Liquids	16.58	Increased 0.04	Inadvertently omitted from STP	16.62	Increased 0.45 Decreased 0.0025	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for treatment in on-site treatability study during FY96	17.07	2.3
3.2.1	LA-W908 Nonhalogenated Organic Liquids	14.34	Increased 0.08	Inadvertently omitted from STP	14.42	Increased 2.83	Waste that was newly generated in FY95 that became covered waste in FY96	17.25	14.2
3.2.1	LA-W909 Bulk Oils	3.75	NC		3.75	Increased 2.28	Waste that was newly generated in FY95 that became covered waste in FY96	6.03	11.4
3.2.1	LA-W910	0.74	NC		0.74	NC		0.74	0.0

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CPV Sec.	MWIR Waste ID and Treatability Group	CPV Vol. (m ³)	FY95 Changes Covered Waste (m ³) ^a	Explanation for FY95 Change	Covered Vol. End of FY95 (m ³)	FY96 Changes Covered Waste (m ³) ^b	Comments	Covered Vol. End of FY96 (m ³)	Projection FY97-FY01 (m ³)
	PCB Wastes with RCRA Components								
3.2.1	LA-W923 Inorganic Solid Oxidizers	0.20	Increased 0.32	Inadvertently omitted from STP	0.52	Decreased 0.087	Shipped for treatment in off-site treatability study during FY96	0.43	0.2
3.3	LA-W924 Lead Wastes - TBD	51.44	Decreased 11.28	Decontaminated and released in FY95	40.16	NC		40.16	0.0
3.3	LA-W925 Mercury Wastes - TBD	18.30	NC		18.30	Increased 1.52	Waste that was newly generated in FY95 that became covered waste in FY96	19.82	7.6
3.3	LA-W926 Compressed Gases - TBD	1.25	NC		1.25	NC		1.25	0.0
3.3	LA-W927 Biochemical Laboratory Wastes	1.34	NC		1.34	NC		1.34	0.0
3.3	LA-W928 Dewatered Treatment Sludge	268.17	NC		268.17	NC		268.17	0.0
3.4.1	LA-W930 Lead for Surface Decontamination	56.20	Decreased 14.64 Increased 22.50	Decontaminated and released in FY95 Received from LD200 effort	64.06	Increased 1.25	Waste that was newly generated in FY95 that became covered waste in FY96	65.31	6.3
3.4.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	14.24	Decreased 0.002 Increased 0.00002	Decontaminated and released in FY95 Inadvertently omitted from STP	14.24	Decreased 0.00094 Decreased 0.0029	Shipped for treatment in on-site treatability study during FY95 Shipped for treatment in on-site treatability study during FY96	14.24	0.0
None ^d	LA-W931 Lead Requiring Sorting	9.97	Decreased 4.58 Increased 5.73	Decontaminated and released in FY95 Received from LD200 effort	11.12	Increased 0.44 Decreased 6.36	Waste that was newly generated in FY95 that became covered waste in FY96 Shipped for off-site treatment at commercial facility during FY96	5.20	2.2
None ^e	LA-W932 Explosives	0.0	NC			NC		0.0	0.0
None ^e	LA-W933 Lab Packs	0.0	NC			Increased 0.13	Waste that was newly generated in FY95 that became covered waste in FY96	0.13	0.8

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**Appendix B
Reported STP MLLW Inventories 1997**

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Table 2-1. FY97 MLLW Inventory Update Summary^a

CPV Sec.	MWIR Waste ID and Treatability Group/Category	3/96 Annual Update Volume (m ³)	FY97 Changes in Covered Waste		Comments	3/98 Annual Update Volume (m ³)	Projection FY98-FY02 (m ³)
			Revision 5 (Other Changes) (m ³)	Revision 6 (3/98 FY97 Annual Update Changes) ^b (m ³)			
3.1.1	LA-W901 IPA Wastes	0.02	Decreased 0.005 ^{e,m}	Decreased 0.02	Shipped off-site for treatment at commercial facility during FY97	0.00	0.0
3.1.1	LA-W902 Scintillation Fluids	0.0038 ^d		Decreased 0.0038	Shipped off-site for treatment at commercial facility during FY97	0.00	0.0
3.1.2	LA-W903 Lead Blankets	0.00				0.00	0.0
3.1.2	LA-W904 Soil with Heavy Metals	10.64	Decreased 0.208 ^{e,m} 0.1047 ⁿ	Decreased 0.62 Decreased 0.42 Decreased 8.91 Decreased 0.14	Transferred to LA-W910 (approved by NMED 9/18/97) Transferred to LA-W911 (approved by NMED 9/18/97) Shipped off-site for treatment at commercial or DOE facilities during FY97 Shipped off-site for treatment at commercial or DOE facilities during FY97	0.55	0.00
3.1.2	LA-W905 ER Soils	0.00				0.00	0.0
3.1.3	LA-W906 Aqueous Organic Liquids	5.70	Increased 0.0005 ^{e,m} Increased 4.83 ^f 4.26 ^{f,n}	Increased 5.74	Waste that was newly generated in FY96 that became covered waste in FY97	15.70	50.0
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	33.51	Increased 1.46 ^f	Increased 0.0038 Increased 0.42	Waste that was newly generated in FY96 that became covered waste in FY97 Transferred from LA-W904 (approved by NMED 9/18/97)	35.39	7.3
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	17.29	Increased 0.95 ^f	Increased 8.58 Increased 0.11	Waste that was newly generated in FY96 that became covered waste in FY97 Unused Treatability Study sample returned from off-site facility in FY97	26.93	47.6

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CPV Sec.	MWIR Waste ID and Treatability Group/Category	3/96 Annual Update Volume (m ³)	FY97 Changes in Covered Waste		Comments	3/98 Annual Update Volume (m ³)	Projection FY98-FY02 (m ³)
			Revision 5 (Other Changes) (m ³)	Revision 6 (3/98 FY97 Annual Update Changes) ^b (m ³)			
3.1.5	LA-W912 Combustible Debris	14.10		Increased 0.32	Waste that was newly generated in FY96 that became covered waste in FY97	14.42	1.6
3.1.5	LA-W921 Activated or Inseparable Lead	8.13		Increased 1.58 Decreased 0.89 Decreased 1.72	Waste that was newly generated in FY96 that became covered waste in FY97 Shipped for off-site treatment at commercial facility during FY97 Shipped off-site for recycle at commercial facility in FY97	7.10	7.9
3.1.5	LA-W922 Noncombustible Debris	27.91		Increased 9.25 Decreased 2.915 Decreased 0.62	Waste that was newly generated in FY96 that became covered waste in FY97 Shipped for off-site treatment at commercial facility during FY97 Shipped for off-site treatment at commercial facility during FY97	33.63	46.2
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	1.65		Increased 1.02	Waste that was newly generated in FY96 that became covered waste in FY97	2.67	5.1
3.1.6	LA-W914 Corrosive Solutions	0.81		Increased 0.04	Waste that was newly generated in FY96 that became covered waste in FY97	0.85	0.2
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.17				0.17	0.0
3.1.7	LA-W916 Water-Reactive Wastes	6.06		Increased 0.68	Waste that was newly generated in FY96 that became covered waste in FY97	6.74	3.4
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35				0.35	0.0

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CPV Sec.	MWIR Waste ID and Treatability Group/Category	3/96 Annual Update Volume (m ³)	FY97 Changes in Covered Waste		Comments	3/98 Annual Update Volume (m ³)	Projection FY98-FY02 (m ³)
			Revision 5 (Other Changes) (m ³)	Revision 6 (3/98 FY97 Annual Update Changes) ^b (m ³)			
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.09		Increased 0.0002	Waste that was newly generated in FY96 that became covered waste in FY97	0.09	0.001
3.1.10	LA-W920 Elemental Mercury	0.52		Increased 0.12	Waste that was newly generated in FY96 that became covered waste in FY97	0.64	0.6
3.2.1	LA-W907 Halogenated Organic Liquids	17.07		Increased 0.15 Decreased 0.0076	Waste that was newly generated in FY96 that became covered waste in FY97 Shipped for off-site treatment at commercial facility during FY97	17.21	0.8
3.2.1	LA-W908 Nonhalogenated Organic Liquids	17.25		Increased 0.09 Increased 0.076 Decreased 0.49 Decreased 0.11	Waste that was newly generated in FY96 that became covered waste in FY97 Correction to volume reported in original STP inventory which was in error Shipped for off-site treatment at commercial facility during FY97 Correction to volume reported in original STP inventory which was in error	16.82	0.4
3.2.1	LA-W909 Bulk Oils	6.03		Increased 0.05 Increased 0.47 Decreased 2.22	Waste that was newly generated in FY96 that became covered waste in FY97 Correction to volume reported in original STP inventory which was in error Shipped for off-site treatment at commercial facility during FY97	4.33	0.2
3.2.1	LA-W910 PCB Wastes with RCRA Components	0.74		Increased 1.39 Increased 0.62	Waste that was newly generated in FY96 that became covered waste in FY97 Transferred from LA-W904 (Approved by NMED 9/18/97)	2.75	0.4
3.2.1	LA-W923 Liquid and Solid Oxidizers	0.43		Increased 0.795	Waste that was newly generated in FY96 that became covered waste in FY97	1.23	4.0

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CPV Sec.	MWIR Waste ID and Treatability Group/Category	3/96 Annual Update Volume (m ³)	FY97 Changes in Covered Waste		Comments	3/98 Annual Update Volume (m ³)	Projection FY98-FY02 (m ³)
			Revision 5 (Other Changes) (m ³)	Revision 6 (3/98 FY97 Annual Update Changes) ^b (m ³)			
3.3	LA-W924 Lead Wastes - TBD	40.16				40.16	0.0
3.3	LA-W925 Mercury Wastes - TBD	19.82		Increased 0.67	Waste that was newly generated in FY96 that became covered waste in FY97	20.49	3.4
3.3	LA-W926 Compressed Gases - TBD	1.25				1.25	0.0
3.3	LA-W927 Biochemical Laboratory Wastes	1.34				1.34	0.0
3.3	LA-W928 Dewatered Treatment Sludge	268.17		Decreased 255.46	Approved by NMED 9/18/97 as Rev. 2.0 to the STP	12.71	0.0
3.4.1	LA-W930 Lead for Surface Decontamination	65.31	Decreased 8.34 ^{g,m}	Increased 12.06 Decreased 0.32 Decreased 0.97 Decreased 1.04 Decreased 5.66	Waste that was newly generated in FY96 that became covered waste in FY97 Shipped for decontamination and recycle at on-site facility in F Y97 Shipped for decontamination and recycle at on-site facility in F Y97 Shipped for decontamination and recycle at on-site facility in F Y97 Shipped for decontamination and recycle at on-site facility in F Y97	69.38	60.3
3.4.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	14.24	Decreased 0.26 ^{h,m}	Decreased 0.0076	Shipped for off-site treatment at commercial facility during FY97	14.23	0.0
None ^d	LA-W931 Lead Requiring Sorting	5.20		Increased 0.64 Decreased 4.78	Waste that was newly generated in FY96 that became covered waste in FY97 Shipped for off-site treatment at commercial facility during FY97	1.06	3.2

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CPV Sec.	MWIR Waste ID and Treatability Group/Category	3/96 Annual Update Volume (m ³)	FY97 Changes in Covered Waste		Comments	3/98 Annual Update Volume (m ³)	Projection FY98-FY02 (m ³)
			Revision 5 (Other Changes) (m ³)	Revision 6 (3/98 FY97 Annual Update Changes) ^b (m ³)			
				Increased 0.02	Correction to Original STP Inventory as discussed in Revision 6.0		
None ^d	LA-W932 Explosives	0.00				0.00	0.0
None ^d	LA-W933 Lab Packs	0.13		Increased 0.003	Waste that was newly generated in FY96 that became covered waste in FY97	0.13	0.02
None	IPA Waste	0.00		Increased 0.0005 ^k Decreased 0.0005 ^k	Omitted from original STP inventory as discussed in Rev. 6.0 Shipped for off-site treatment at commercial facility during FY97	0.00	0.0
None ^d	Missing/ nonexistent/ TBV category	0.00	Increased 0.2082 ^e 0.1047 ^m ⁿ Increased 0.26 ^m Increased 8.34 ^m			0.00	Not Applicable

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NOTES TO TABLE

- ^a The covered waste volumes reported in Appendix B of the proposed Revision 6.0 include the volume changes in Revisions 4.0 and 5.0, approved by NMED in FY98 (December 29, 1997). Therefore, the volume changes in Revision 4.0 and 5.0 are not reflected in the FY97 STP *Annual Update* and are not included in this table. Because of this, the volumes in this table cannot be compared to the volumes reported in Appendix B. Also refer to *Note to Reader* in Section 2.1.1.
- ^b These changes are the additional changes in FY 97 that were not previously reported in Rev. 5.0.
- ^c One item from treatability group LA-W901 (*IPA wastes*) transferred to LA-W906 (*Aqueous Organic Liquids*) treatability group in Rev. 5.0 (also see footnote m).
- ^d The final FY96 volume for most treatability groups is reported to two decimal places for consistency with the original STP inventory. The final FY96 LA-W902 volume is given as 0.0038m³ (i.e., reported to four decimal places) in order to accurately report the presence of one small-volume waste item in this treatability group remaining in the LANL inventory at the end of FY96. This item was shipped off-site on December 18, 1996.
- ^e Items of LA-W904 waste transferred to the category of *Missing/Nonexistent/TBV* in Rev. 5.0 (also see footnotes m and n).
- ^f These are wastes that were generated in FY96 and became covered waste in FY97; they were included in the Revision 5 request to facilitate expedited treatment and disposal of these wastes.
- ^g Items of LA-W930 waste transferred to the category of *Missing/Nonexistent/TBV* in Rev. 5.0 (also see footnote m).
- ^h Items of LA-W929 waste transferred to the category of *Missing/Nonexistent/TBV* in Rev. 5.0 (also see footnote m).
- ⁱ This treatability group (LA-W931, *Lead Requiring Sorting*) is not listed in the *Compliance Plan Volume*; however, it is discussed in section 3.4.3 of the *Background Volume*.

**Appendix C
Reported STP MLLW Inventories FY'98
(Through Revision 7.0)**

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
3.1.1	IPA Wastes	LA-W901-0	7	0.02	Decrease 7	Decrease 0.02					0	0.00	0	0.00
3.1.1	Scintillation Fluids	LA-W902-0	1	0.0038	Decrease 1	Decrease 0.0038					0	0.00	0	0.00
3.1.2	Lead Blankets	LA-W903-0	0	0.00							0	0.00	0	0.00
3.1.2	Soil with Heavy Metals	LA-W904-0	58	10.33 10.43 ^a	Decrease 6	Decrease 0.62 ^b					2	0.34		
					Decrease 2	Decrease 0.42 ^c								
					Decrease 46	Decrease 8.91								
					Decrease 2	Decrease 0.14								
		LA-W904-5	1	0.11							1	0.11	3	0.45
3.1.2	ER Soils	LA-W905-0	0	0.00							0	0.00	0	0.00
3.1.3	Aqueous Organic Liquids	LA-W906-0	45	1.65							45	1.65		
		LA-W906-4	27	0.36							27	0.36		
		LA-W906-5	101	8.88 8.31 ^d							101	8.31		
		LA-W906-6	0	0.00	Increase 88	Increase 5.74					88	5.74	261	16.06
3.1.4	Organic-Contaminated Combustible Solids	LA-W911-0	305	28.10	Increase 2	Increase 0.42 ^e					307	28.52	382	36.07

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
		LA-W911-4	33	0.68							33	0.68		
		LA-W911-5	40	6.87							40	6.87		
		LA-W911-6	0	0.00	Increase 1	Increase 0.0038					1	0.0038		
		LA-W911-7	0	0.00					Increase 1	Increase 0.001	1	0.001		
3.1.4	Organic-Contaminated Noncombustible Solids	LA-W919-0	79	7.71	Increase 1	Increase 0.11 ^e					80	7.82	227	
		LA-W919-4	9	0.38							9	0.38	231	
		LA-W919-5	89	10.53							89	10.53	23112	
		LA-W919-6	0	0.00	Increase 49	Increase 8.58					49	8.58		27.31
		LA-W919-7	0	0.00					Increase 4	Increase 0.002	4	0.002		
3.1.5	Combustible Debris	LA-W912-0	83	13.82							83	13.82		
		LA-W912-4	9	0.75							9	0.75		
		LA-W912-5	5	0.28							5	0.28		
		LA-W912-6	0	0.00	Increase 6	Increase 0.32					6	0.32		
		LA-W912-7	0	0.00					Increase 2	Increase 0.0004	2	0.0004	103	15.17
3.1.5	Activated or Inseparable Lead	LA-W921-0	14	4.77	Decrease 1	Decrease 0.06 ^f			Increase 1	Increase 0.208	14	2.99		
					Decrease 2	Decrease 1.72					12	3.20		
		LA-W921-5	18	3.35	Decrease	Decrease					14	2.52		

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
					4	0.83 ^f								
		LA-W921-6	0	0.00	Increase 9	Increase 1.58					9	1.58	34 35	7.09 7.30
3.15	Non-combustible Debris	LA-W922-0	41	5.62	Decrease 14	Decrease 2.915					27	2.71		
		LA-W922-4	53	2.83							53	2.83		
		LA-W922-5	63	22.29	Decrease 3	Decrease 0.62					60	21.67		
		LA-W922-6	0	0.00	Increase 51	Increase 9.25					51	9.25	191	36.46
3.1.6	Aqueous Wastes with Heavy Metals	LA-W913-0	83	1.50							83	1.50		
		LA-W913-4	25	0.40							25	0.40		
		LA-W913-5	11	0.15							11	0.15		
		LA-W913-6	0	0.00	Increase 20	Increase 1.02					20	1.02	139	3.07
3.1.6	Corrosive Solutions	LA-W914-0	60	0.69							60	0.69		
		LA-W914-4	90	0.36							90	0.36		
		LA-W914-5	39	0.12							39	0.12		
		LA-W914-6	0	0.00	Increase 8	Increase 0.04					8	0.04	197	1.21
3.1.6	Aqueous Cyanides, Nitrates, Chromates, and Arsenates	LA-W915-0	9	0.13							9	0.13		
		LA-W915-4	3	0.002							3	0.002		
		LA-W915-5	11	0.04							11	0.04	23	0.17
3.1.7	Water- Reactive Wastes	LA-W916-0	78	6.03							78	6.03		
		LA-W916-4	26	0.31							26	0.31		
		LA-W916-5	4	0.03							4	0.03		
		LA-W916-6	0	0.00	Increase 5	Increase 0.68					5	0.68	113	7.05
3.1.8	Compressed Gases	LA-W917-0	13	0.35							13	0.35		

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
	Requiring Scrubbing	LA-W917-7	0	0.00					Increase 12	Increase 0.28	12	0.28	13	0.35
3.1.9	Compressed Gases Requiring Oxidation	LA-W918-0	6	0.08							6	0.08	177	1.32
		LA-W918-4	168	1.23							168	1.23		
		LA-W918-5	2	0.01							2	0.01		
		LA-W918-6	0	0.00	Increase 1	Increase 0.0002					1	0.0002		
		LA-W918-7	0	0.00					Increase 15	Increase 0.46	15	0.46		
3.1.10	Elemental Mercury	LA-W920-0	45	0.50							45	0.50	79	0.66
		LA-W920-4	20	0.02							20	0.02		
		LA-W920-5	9	0.02							9	0.02		
		LA-W920-6	0	0.00	Increase 5	Increase 0.12					5	0.12		
3.2.1 3.1.11	Halogenated Organic Liquids	LA-W907-0	384	16.58	Decrease 3	Decrease 0.0076					381	16.57	525	18.26
		LA-W907-4	97	1.05							97	1.05		
		LA-W907-5	31	0.49							31	0.49		
		LA-W907-6	0	0.00	Increase 16	Increase 0.15					16	0.15		
		LA-W907-7	0	0.00					Increase 12	Increase 0.04	12	0.04		
3.2.1 3.1.11	Nonhalogenated Organic Liquids	LA-W908-0	275	14.34	Increase 0*	Increase 0.076					271	13.82	537	18.30

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
					Decrease 4	Decrease 0.49								
					Decrease 0 ^h	Decrease 0.11								
		LA-W908-4	409	3.38							409	3.38		
		LA-W908-5	130	2.91							130	2.91		
		LA-W908-6	0	0.00	Increase 33	Increase 0.09					33	0.09		
		LA-W908-7							Increase 56	Increase 0.02	56	0.02	843 899	20.20 20.22
3.2.1 3.1.11	Bulk Oils	LA-W909-0	28	3.75	Increase 0 ⁱ	Increase 0.47					5	2.00		
					Decrease 23	Decrease 2.22								
		LA-W909-4	8	1.48							8	1.48		
		LA-W909-5	28	2.28							28	2.28		
		LA-W909-6	0	0.00	Increase 4	Increase 0.05					4	0.05	45	5.81
3.2.1 3.1.11	PCB Wastes with RCRA Components	LA-W910-0	4	0.74	Increase 6	Increase 0.62 ^h					10	1.36		
		LA-W910-6	0	0.00	Increase 30	Increase 1.39					30	1.39	40	2.75
3.2.1 3.1.11	Liquid and Solid Oxidizers	LA-W923-0	6	0.117							6	0.117		
		LA-W923-4	67	0.145							67	0.145		
		LA-W923-5	13	0.317							13	0.317		
		LA-W923-6	0	0.00	Increase 7	Increase 0.795					7	0.795	93	1.37
3.3 3.2	Lead Waste - TBD	LA-W924-0	129	40.16							129	40.16	129	40.16
3.3	Mercury	LA-W925-0	63	18.30							63	18.30		

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
3.2	Wastes - TBD	LA-W925-4	37	0.42							37	0.42		
		LA-W925-5	14	1.52							14	1.52		
		LA-W925-6	0	0.00	Increase 23	Increase 0.67					23	0.67	137	20.91
3-3.3.2	Compressed Gases - TBD	LA-W926-0	10	1.25							10	1.25	10	1.25
3-3.3.2	Biochemical Laboratory Wastes	LA-W927-0	9	1.34							9	1.34	9	1.34
3-3.3.2	Dewatered Treatment Sludge	LA-W928-0	61	12.71							61	12.71	61	12.71
3-3.3.2	Explosives	LA-W932-0	0	0.00							0	0.00		
		LA-W932-4	1	0.000001							1	0.000001	1	0.000001
3-3.3.2	Lab Packs	LA-W933-0	0	0.00							0	0.00		
		LA-W933-4	114	0.17							114	0.17		
		LA-W933-5	28	0.13							28	0.13		
		LA-W933-6	0	0.00	Increase 6	Increase 0.003	Increase 1	Increase 0.00002 ¹			7	0.003		
		LA-W933-7	0	0.00					Increase 4	Increase 0.002	4	0.002	149	0.30
3-4-1 3.3.1	Lead for Surface Decontamination	LA-W930-0	36	33.43	Decrease 1	Decrease 0.11 ^k			Increase 0 ^h Decrease 1	Increase 0.095 De-crease 0.208	23 22	26.27 26.16		
					Decrease 4	Decrease 0.35 ^k								
					Decrease 6	Decrease 1.04								
					Decrease 2	Decrease 5.66								

TABLE B-1. SUMMARY TABLE
STP/CPV MLLW INVENTORY CHANGES FOR REVISION 7.0

CPV Section	Treatability Group	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 7 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
		LA-W930-5	115	23.75	Decrease 1	Decrease 0.21 ^k					111	22.92		
		LA-W930-6	0	0.00	Decrease 3	Decrease 0.62 ^k								
					Increase 14	Increase 12.06					14	12.06	148	61.25
3.4.2	Nonradioactive or Suspect Waste Items to be Surveyed	LA-W929-0	2	0.0076	Decrease 2	Decrease 0.0076					0	0.00	147	61.14
3.3.2		LA-W929-5	1	0.00002			Decrease 1	Decrease 0.00002 ^l			0	0.00	0	0.00
None ^l	Lead Requiring Sorting	LA-W931-0	23	4.76	Decrease 23	Decrease 4.78					0	0.00		
3.3.3					Increase 0 ^m	Increase 0.02								
		LA-W931-5	8	0.44							8	0.44		
		LA-W931-6	0	0.00	Increase 4	Increase 0.64					4	0.64	12	1.08
None ⁿ	IPA	None	0	0.00	Increase 1	Increase 0.0005 ⁿ					0	0.00		
					Decrease 1	Decrease 0.0005 ⁿ								

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CPV Section	Category	MWIR ID (by subgroup)	Net Covered Waste Inventory by Subgroup (reported in Rev. 4/5)		Revision 6 (3/98 FY97 Annual Update Changes)		Revision 6 (Other Changes)		Revision 7		Subtotal (by subgroup)		Net Covered Waste Inventory (including Rev. 6 changes)	
			Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)	Items	Volume (m ³)
3.5 3.4	Missing/nonexistent/ TBV	NONE (Revision 5)	48	8.81					0	Decrease 0.00095 ^p	48	8.81	48	8.81

NOTES:

- ^a This correction in LA-W904 volume arises from an error in the Appendix B in Revision 4/5 as discussed in Revision 6.0.
- ^b This transfer of LA-W904 waste to LA-W910 was approved by NMED on September 18, 1997 as discussed in Revision 6.0
- ^c This transfer of LA-W904 waste to LA-W911 was approved by NMED on September 18, 1997 as discussed in Revision 6.0
- ^d This correction in LA-W906 volume arises from an error in the Appendix B in Revision 4/5 as discussed in Revision 6.0.
- ^e The volume increase arises from the return of unused treatability study sample. It has been returned to the original inventory of LA-W919 (subgroup -0) consistent with the inventory subgroup from which the sample was removed.
- ^f These 5 items in subgroups LA-W921-0 and -5 (0.89 m³ total) were shipped on December 9, 1996 as discussed in DOE's letter dated December 24, 1996.
- ^g This increase in LA-W908 volume arises from an error in the original STP inventory data as discussed in Revision 6.0.

**Appendix D
Reported STP MLLW Inventories FY98
(Through Revision 9.0)**

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Table 2.1-2. FY98 MLLW Inventory Detailed Update by Treatability Group.

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

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	3/98 Annual Update (m ³)	Revision 7.0 (m ³)	Proposed Revision 9.0 (m ³)	Comments	FY98 Annual Update (m ³)	Projection FY99-FY03 (m ³)
				0.41 0.06 (0.01) 0.11	Newly generated Administrative adjustments Transferred to missing Transferred from LA-W916		
3.1.11	LA-W909 Bulk Oils	4.33	5.81	(1.08) 0.42	Shipped off-site for treatment Newly generated	5.15	0.00
3.1.11	LA-W910 PCB Wastes with RCRA Components	2.75	2.75	0.10 0.32 0.02	Newly generated Transferred from LA-W921 Transferred from LA-W924	3.19	20.00
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.23	1.37	(0.001)	Shipped off-site for treatment	1.37	0.00
3.2	LA-W924 Lead Wastes - TBD	40.16	40.16	(2.5) (10.54) (5.52) (0.003) (2.82) 0.10 (0.02)	Shipped off-site for treatment Shipped off-site for treatment Off-site Recycle On-site Decon Transferred to missing Administrative adjustments Transferred to LA-W910	18.86	0.00
3.2	LA-W925 Mercury Wastes - TBD	20.49	20.91	(14.49)	Shipped off-site for treatment	6.42	0.00
3.2	LA-W926 Compressed Gases – TBD	1.25	1.25	(1.06)	Treatability Study	0.19	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	1.34	1.34			1.34	0.00
3.2	LA-W928 Dewatered Treatment Sludge	12.71	12.71			12.71	0.00
3.2	LA-W932 Explosives	0.00	0.000001			0.000001	0.00
3.2	LA-W933 Lab Packs	0.13	0.30	(0.001) 0.009	Treatability Study Administrative adjustment	0.31	0.00
3.3.1	LA-W930 Lead for Surface Decontamination	69.38	61.14	(4.99) (6.66) (0.68) (0.09) (2.08) (4.58) (4.25)	Off-site Recycle Off-site Recycle On-site Decon On-site Decon On-site Decon On-site Decon On-site Decon	37.81	0.00
3.3.3	LA-W931 Lead Requiring Sorting	1.06	1.08			1.08	0.00
3.4	Missing/ nonexistent/ TBV category	0.00	8.81	0.01 2.82	Transferred from LA-W908 Transferred from LA-W924	11.64	Not Applicable

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

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

**Appendix E
Reported STP MLLW Inventories
(1) FY99 Update
(2) Revision 10.0 Final**

**FY07 Annual STP Update
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(1) FY99 MLLW Inventory Detailed Update by Treatability Group.

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Comments	FY99 Annual Update (m ³)	Projection FY99-FY03 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00			0.00	0.00
3.1.1	LA-W902 Scintillation Fluids	0.00			0.00	0.00
3.1.2	LA-W903 Lead Blankets	0.00			0.00	0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.45	(0.45) 0.68	Shipped off-site for treatment Newly generated	0.68	0.00
3.1.2	LA-W905 ER Soils	0.00			0.00	0.00
3.1.3	LA-W906 Aqueous Organic Liquids	9.25	(0.01) (1.09) (0.15) (2.18) (2.74) (0.95) (0.01) (0.0005) 0.34	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	2.46	1.00
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	33.29	(0.75) (0.004) (0.01) (0.001) (0.006) 0.75	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	33.27	3.20
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	22.45	(2.44) (0.95) (0.42) 4.92	Shipped off-site for treatment Shipped off-site for treatment SSD Project Newly generated	23.56	7.95
3.1.5	LA-W912 Combustible Debris	15.17	(0.003) 0.11 (0.11)	SSD Project Newly generated Transfer to LA-W916	15.17	0.00
3.1.5	LA-W921 Activated or Inseparable Lead	6.88	(0.63) (0.23) (0.23) (2.6) 0.63	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for recycling Newly generated	3.82	0.00
3.1.5	LA-W922 Noncombustible Debris	40.46	(5.49) (4.79) (0.64) (0.11) (1.21) (1.003) (3.45) (2.75) (3.05) (0.0009) (0.21) (0.009) 2.25	Shipped off-site for treatment Shipped off-site for recycling SSD Project Transfer to Missing Transfer to LA-W917 Newly generated	20.00	27.00
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	4.40	(0.14) 0.98	SSD Project Newly generated	5.24	6.65
3.1.6	LA-W914 Corrosive Solutions	1.23	(0.008) (0.006) 0.03	SSD Project SSD Project Newly generated	1.25	0.05
3.1.6	LA-W915 Aqueous Cyanides,	0.94	0.0007	Newly generated	0.94	4.55

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Comments	FY99 Annual Update (m ³)	Projection FY99- FY03 (m ³)
	Nitrates, Chromates, and Arsenates					
3.1.7	LA-W916 Water-Reactive Wastes	1.49	(0.0004) 0.52 0.11	SSD Project Newly generated Transferred from LA-W912	2.12	0.25
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35	(0.07) 0.009 0.01	Treatability study Transferred from LA-W922 Newly generated	0.30	0.00
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.74	(0.03) (0.02) (0.005) 0.04	Treatability study SSD Project SSD Project Newly generated	1.73	0.00
3.1.10	LA-W920 Elemental Mercury	0.64	0.006 0.0000	Newly generated Transfer to Missing	0.65	0.01
3.1.11	LA-W907 Halogenated Organic Liquids	6.62	(3.21) (0.004) (0.72) (0.25) (0.99) (0.0005) 0.007	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	1.45	0.1
3.1.11	LA-W908 Nonhalogenated Organic Liquids	16.56	(4.89) (0.56) (1.94) (0.99) (0.0005) (0.49) (0.5) (0.06) 0.49	Shipped off-site for treatment Shipped off-site for treatment SSD Project SSD Project Newly generated	7.62	2.05
3.1.11	LA-W909 Bulk Oils	5.15	(0.001) (0.83) 0.84	Shipped off-site for treatment SSD Project Newly generated	5.16	2.1
3.1.11	LA-W910 PCB Wastes with F Components	3.19	0.0003	Newly generated	3.19	0.5
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.37	(0.007) 0.01	SSD Project Newly generated	1.37	0.00
3.2	LA-W924 Lead Wastes – TBD	18.86	(0.62) (0.34)	Shipped off-site for treatment Shipped off-site for recycling	17.90	0.00
3.2	LA-W925 Mercury Wastes – TBD	6.42 2.61*	(0.007) (0.23) (0.003) 0.01 0.001	Treatability study Treatability study SSD Project Newly generated Transfer to Missing	6.19 2.61	1.4
3.2	LA-W926 Compressed Gases – TBD	0.19			0.19	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	1.34	(1.34)	Shipped off-site for treatment	0.00	0.00
3.2	LA-W928 Dewatered Treatment Sludge	12.71	(4.16)	Shipped off-site for treatment	8.55	0.00
3.2	LA-W932 Explosives	0.000001	0.000001	On-site Recycle	0.00	0.00
3.2	LA-W933 Lab Packs	0.31	(0.03)	SSD Project	0.28	0.00

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Comments	FY99 Annual Update (m ³)	Projection FY99-FY03 (m ³)
3.3.1	LA-W930 Lead for Surface Decontamination	37.81	(0.84) (1.74) (0.28) (3.23) (0.56) (10.76) (1.78) (2.29) (11.42) (0.66)	Shipped off-site for treatment Shipped off-site for treatment Shipped off-site for recycling Shipped off-site for recycling Shipped off-site for recycling Shipped off-site for recycling On-Site lead decon On-Site lead decon Approved for transfer to MTRU (Amendment 3.0) Administrative Adjustment	4.25	0.00
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00			0.00	0.00
3.3.3	LA-W931 Lead Requiring Sorting	1.08			1.08	0.00
3.4	Missing/ nonexistent/ TBV category	11.64	0.21 0.001 0.0000	Transferred from LA-W922 Transferred from LA-W925 Transferred from LA-W920	11.85	Not Applicable
	TOTALS	261.99 2.61*	(81.74)		182.88	

(2) Revision 10.0 Final

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	FY99 Annual Update (m ³)	FINAL Revision 10.0 (m ³)	Totals after FINAL Rev 10
3.1.1	LA-W901 IPA Wastes	0.00		0.00		0.00
3.1.1	LA-W902 Scintillation Fluids	0.00		0.00		0.00
3.1.2	LA-W903 Lead Blankets	0.00		0.00		0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.45	(0.45) 0.68	0.68		0.68
3.1.2	LA-W905 ER Soils	0.00		0.00		0.00
3.1.3	LA-W906 Aqueous Organic Liquids	9.25	(0.01) (1.09) (0.15) (2.18) (2.74) (0.95) (0.01)	2.46		2.46

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	FY99 Annual Update (m ³)	FINAL Revision 10.0 (m ³)	Totals after FINAL Rev 10
			(0.0005) 0.34			
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	33.29	(0.75) (0.004) (0.01) (0.001) (0.006) 0.75	33.27	(0.2) 0.11 (0.11) 0.4	33.47
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	22.45	(2.44) (0.95) (0.42) 4.92	23.56	0.08 (0.08)	23.56
3.1.5	LA-W912 Combustible Debris	15.17	(0.003) 0.11	15.28		15.28
3.1.5	LA-W921 Activated or Inseparable Lead	6.88	(0.63) (0.23) (0.23) (2.6) 0.63	3.82		3.82
3.1.5	LA-W922 Noncombustible Debris	40.46	(5.49) (4.79) (0.64) (0.11) (1.21) (1.003) (3.45) (2.75) (3.05) (0.0009) (0.21) (0.009) 2.25	20.00	(0.34) (0.00004) (0.001) (0.01) (0.11)	19.54
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	4.40	(0.14) 0.98	5.24		5.24
3.1.6	LA-W914 Corrosive Solutions	1.23	(0.008) (0.006)	1.25		1.25

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	FY99 Annual Update (m ³)	FINAL Revision 10.0 (m ³)	Totals after FINAL Rev 10
			0.03			
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.94	0.0007	0.94	0.00004	0.94
3.1.7	LA-W916 Water-Reactive Wastes	1.49	(0.0004) 0.52	2.01	0.34	2.35
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.35	(0.07) 0.009 0.01	0.30		0.30
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.74	(0.03) (0.02) (0.005) 0.04	1.73		1.73
3.1.10	LA-W920 Elemental Mercury	0.64	0.006	0.65		0.65
3.1.11	LA-W907 Halogenated Organic Liquids	6.62	(3.21) (0.004) (0.72) (0.25) (0.99) (0.0005) 0.007	1.45	0.59 (0.59) 0.02 (0.2)	1.45
3.1.11	LA-W908 Nonhalogenated Organic Liquids	16.56	(4.89) (0.56) (1.94) (0.99) (0.0005) (0.49) (0.5) (0.06) 0.49	7.62	0.11 (0.11)	7.62
3.1.11	LA-W909 Bulk Oils	5.15	(0.001) (0.83) 0.84	5.16	0.28 (0.28) 0.38	5.54
3.1.11	LA-W910 PCB Wastes with RCRA Components	3.19	0.0003	3.19		3.19

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	FY99 Annual Update (m ³)	FINAL Revision 10.0 (m ³)	Totals after FINAL Rev 10
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.37	(0.007) 0.01	1.37	(.05)	1.32
3.2	LA-W924 Lead Wastes – TBD	18.86	(0.62) (0.34)	17.90	(4.79)	13.11
3.2	LA-W925 Mercury Wastes – TBD	6.42 2.61*	(0.007) (0.23) (0.003) 0.01	6.19 2.61	0.01	6.19 2.62
3.2	LA-W926 Compressed Gases – TBD	0.19		0.19	(0.19)	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	1.34	(1.34)	0.00		0.00
3.2	LA-W928 Dewatered Treatment Sludge	12.71	(4.16)	8.55		8.55
3.2	LA-W932 Explosives	0.000001	0.000001	0.00		0.00
3.2	LA-W933 Lab Packs	0.31	(0.03)	0.28	0.001 0.05	0.33
3.2	LA-W934 High Activity Waste				0.11 4.79 0.19 0.01	5.1
3.3.1	LA-W930 Lead for Surface Decontamination	37.81	(0.84) (1.74) (0.28) (3.23) (0.56) (10.76) (1.78) (2.29) (11.42) (0.66)	4.25		4.25
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00		0.00		0.00
3.3.3	LA-W931 Lead Requiring Sorting	1.08		1.08	(0.11)	0.97

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY98 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	FY99 Annual Update (m ³)	FINAL Revision 10.0 (m ³)	Totals after FINAL Rev 10
3.4	Missing/ nonexistent/ TBV category	11.64	0.21	11.85	0.2 0.11	12.16
	TOTALS	261.99 2.61*	(81.74)	182.88		183.67

*Omitted from FY98 Update by mistake.

**FY07 Annual STP Update
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FY00 MLLW Inventory Detailed Update by Treatability Group

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY99 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Proposed Revision 11.0 (m ³)	Comments	FY00 Annual Update (m ³)	Projection FY00-FY04 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00	0.00				0.00
3.1.1	LA-W902 Scintillation Fluids	0.00	0.00				0.00
3.1.2	LA-W903 Lead Blankets	0.00	0.00				0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.68	0.68			0.68	0.00
3.1.2	LA-W905 ER Soils	0.00	0.00				0.00
3.1.3	LA-W906 Aqueous Organic Liquids	2.46	2.46	(0.33) (0.02) (0.21) (0.42) (0.21) (0.59)	Shipped to DSSI 12/17/99 Shipped to DSSI 12/17/99 Shipped to WCS 1/25/00 Shipped to DSSI 3/28/00 Shipped to DSSI 6/27/00 Shipped to Perma-Fix 7/25/00	0.68	1.00
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	33.27	33.47	(0.38) (0.21) (0.04) (0.62) (0.11) (2.08) 0.11 0.11	Shipped to Perma-Fix 2/25/00 Shipped to ATG 3/31/00 Shipped to DSSI 6/27/00 Shipped to Perma-Fix 7/25/00 Shipped to Perma-Fix 7/25/00 Shipped to ATG 7/26/00 Administrative Adjustment Newly Generated	30.25	0.00
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	23.56	23.56	(0.00) (0.001) (0.08) 0.08	Shipped to DSSI 12/17/99 Shipped to DSSI 3/28/00 Shipped to ATG 5/31/00 Administrative Adjustment	23.56	0.00
3.1.5	LA-W912 Combustible Debris	15.17	15.28	(0.002) (13.49) (0.23) (1.34) (0.11) (0.11)	Shipped to DSSI 12/17/99 Shipped to ATG 3/31/00 Shipped to ATG 5/31/00 Shipped to Envirocare 6/27/00 Shipped to ATG 7/26/00 Administrative Adjustment	0.00	0.00
3.1.5	LA-W921 Activated or Inseparable Lead	3.82	3.82	(0.74) (0.63) (2.61) (0.0006) 0.16	Shipped to ATG 5/31/00 Shipped to Envirocare 6/27/00 Shipped to Envirocare 6/27/00 Shipped to ATG 7/26/00 Administrative Adjustment	0.00	0.00
3.1.5	LA-W922 Noncombustible Debris	20.00	19.54	(1.19) (2.03) (13.95) (0.22) (0.80) (0.70) (0.0002) (0.65)	Shipped to ATG 5/31/00 Shipped to Envirocare 6/27/00 Shipped to Envirocare 6/27/00 Shipped to ATG 7/26/00 Shipped to ATG 7/26/00 Shipped to GTS 8/1/00 Shipped to GTS 8/1/00 Administrative Adjustment	0.00	0.00
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	5.24	5.24	(0.0002) (0.005) (0.09) (0.83) (2.20) (0.37) (0.14)	Shipped to DSSI 12/17/99 Shipped to WCS 1/25/00 Shipped to DSSI 3/28/00 Shipped to DSSI 6/27/00 Shipped to DSSI 6/27/00 Shipped to Perma-Fix 9/14/00 Administrative Adjustment	1.60	0.00
3.1.6	LA-W914 Corrosive Solutions	1.25	1.25	(0.0004) (0.29) (0.00)	Shipped to WCS 1/25/00 Shipped to DSSI 3/28/00 Shipped to DSSI 3/28/00	0.62	0.00

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CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY99 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Proposed Revision 11.0 (m ³)	Comments	FY00 Annual Update (m ³)	Projection FY00-FY04 (m ³)
				(0.11) (0.23) (0.002)	Shipped to DSSI 6/27/00 Shipped to Perma-Fix 9/14/00 Administrative Adjustment		
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.94	0.94	(0.002) (0.48)	Shipped to Perma-Fix 9/14/00 Administrative Adjustment	0.46	0.00
3.1.7	LA-W916 Water-Reactive Wastes	2.12	2.35	(0.00) 0.11 0.0005	Shipped to ATG 7/26/00 Administrative Adjustment Newly Generated	2.44	0.00
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.30	0.30			0.30	0.00
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.73	1.73			1.73	0.00
3.1.10	LA-W920 Elemental Mercury	0.65	0.65	(0.21) (0.002) (0.05)	Shipped to ATG 7/26/00 Shipped to BNL 9/25/00 Shipped to BNL 9/25/00	0.39	0.01
3.1.11	LA-W907 Halogenated Organic Liquids	6.62	1.45	(0.60) (0.08) (0.02) (0.0001) (0.02) 0.02 (0.02)	Shipped to DSSI 12/17/99 Shipped to Perma-Fix 2/25/00 Shipped to Perma-Fix 2/25/00 Shipped to DSSI 3/28/00 Shipped to DSSI 6/27/00 Administrative Adjustment Administrative Adjustment	0.73	0.1
3.1.11	LA-W908 Nonhalogenated Organic Liquids	16.56	7.62	(0.46) (0.005) (0.04) (0.34) (0.08) (0.11) (0.05) (0.12) (0.90) 0.11	Shipped to DSSI 12/17/99 Shipped to Perma-Fix 2/25/00 Shipped to Perma-Fix 2/25/00 Shipped to DSSI 3/28/00 Shipped to DSSI 6/27/00 Shipped to DSSI 6/27/00 Shipped to Perma-Fix 7/25/00 Shipped to Perma-Fix 7/25/00 Shipped to Perma-Fix 9/14/00 Administrative Adjustment	5.62	0.00
3.1.11	LA-W909 Bulk Oils	5.15	5.54	(1.11) (0.40) (0.25) (0.83) (0.62) 0.25 0.21	Shipped to DSSI 12/17/99 Shipped to DSSI 3/28/00 Shipped to DSSI 3/28/00 Shipped to DSSI 6/27/00 Shipped to DSSI 6/27/00 Administrative Adjustment Newly Generated	2.79	0.00
3.1.11	LA-W910 PCB Wastes with RCRA Components	3.19	3.19	(0.06) 0.02 0.81	Shipped to DSSI 3/28/00 Newly generated Administrative Adjustment	3.96	0.5
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.37	1.32	(0.0007)	Shipped to Perma-Fix 9/14/00	1.32	0.00
3.2	LA-W924 Lead Wastes – TBD	18.86	13.11	(8.52) 0.66	Shipped to GTS 9/19/00 Newly Generated	5.25	0.00
3.2	LA-W925 Mercury Wastes – TBD	6.42 2.61*	6.19 2.62	(0.01) (2.61)	Shipped to BNL 9/25/00 Administrative Adjustment	6.19	1.4
3.2	LA-W926 Compressed Gases – TBD	0.19	0.00			0.00	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	1.34	0.00			0.00	0.00
3.2	LA-W928 Dewatered Treatment	12.71	8.55	(8.55)	Proposed for Deletion	0.00	0.00

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CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY99 Annual Update (m ³)	Proposed Revision 10.0 (m ³)	Proposed Revision 11.0 (m ³)	Comments	FY00 Annual Update (m ³)	Projection FY00-FY04 (m ³)
	Sludge						
3.2	LA-W932 Explosives	0.000001	0.00	0.004	Newly Generated	0.004	0.00
3.2	LA-W933 Lab Packs	0.31	0.33	(0.001) (0.02) (0.0001) (0.003) (0.00001) 0.21 0.48	Shipped to DSSI 12/17/99 Shipped to ATG 3/31/00 Shipped to ATG 7/26/00 Shipped to Perma-Fix 9/14/00 Administrative Adjustment Newly Generated Administrative Adjustment	1.00	0.00
3.2	LA-W934 High Activity Waste	0.00	5.1			5.1	
3.3.1	LA-W930 Lead for Surface Decontamination	37.81	4.25	(4.25)	Shipped to TA-50 11/15/99	0.00	0.00
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00	0.00			0.00	0.00
3.3.3	LA-W931 Lead Requiring Sorting	1.08	0.97	(0.02)	Shipped to ATG 3/31/00	0.95	0.00
3.4	Missing/ nonexistent/ TBV category	11.85	12.16	(0.0002) (0.0005) (0.14)	Shipped to DSSI 3/28/00 Shipped to ATG 3/31/00 Shipped to Perma-Fix 9/14/00	12.02	N/A
	TOTALS	182.88	183.67	(76.01)		107.66	

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY00 Annual Update (m ³)	Proposed Revision 12.0 (m ³)	Comments	FY01 Annual Update (m ³)	Projection FY01-FY05 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00				0.00
3.1.1	LA-W902 Scintillation Fluids	0.00				0.00
3.1.2	LA-W903 Lead Blankets	0.00				0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.68	(0.68)	Shipped to WCS 6/25/01	0.00	0.00
3.1.2	LA-W905 ER Soils	0.00				0.00
3.1.3	LA-W906 Aqueous Organic Liquids	0.68			0.68	1.00
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	30.25	(8.52) (2.66) (1.38) (3.65) (1.92) 5.01	Shipped to ATG 10/31/00 Shipped to ATG 2/12/01 Shipped to DSSI 3/1/01 Shipped to Perma-Fix 7/31/01 Shipped to Perma-Fix 9/27/01 Administrative Adjustment	17.13	0.00
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	23.56	(2.72) (1.27) (6.05) (0.85)	Shipped to WCS 7/30/01 Shipped to Perma-Fix 9/12/01 Shipped to Perma-Fix 9/27/01 Administrative Adjustment	12.67	0.00
3.1.5	LA-W912 Combustible Debris	0.00			0.00	0.00
3.1.5	LA-W921 Activated or Inseparable Lead	0.00			0.00	0.00
3.1.5	LA-W922 Noncombustible Debris	0.00	(0.21) 0.21 1.31	Shipped to WCS 6/25/01 Administrative Adjustment Newly Generated	1.31	2.00
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	1.60	(0.002) (1.42) (0.18)	Shipped to Envirocare 4/14/01 Shipped to WCS 5/7/01 Administrative Adjustment	0.00	0.00
3.1.6	LA-W914 Corrosive Solutions	0.62	(0.38) (0.24)	Shipped to WCS 5/7/01 Administrative Adjustment	0.00	0.00
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.46	(0.92) 0.46	Shipped to WCS 5/7/01 Administrative Adjustment	0.00	0.00
3.1.7	LA-W916 Water-Reactive Wastes	2.44	(0.00001) 0.25 0.0047	Shipped to WCS 5/7/01 Administrative Adjustment Newly Generated	2.69	0.01
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.30			0.30	0.00
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.73	0.21	Administrative Adjustment	1.94	0.00
3.1.10	LA-W920 Elemental Mercury	0.39	0.05	Administrative Adjustment	0.44	0.01

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY00 Annual Update (m ³)	Proposed Revision 12.0 (m ³)	Comments	FY01 Annual Update (m ³)	Projection FY01-FY05 (m ³)
3.1.11	LA-W907 Halogenated Organic Liquids	0.73	(0.55)	Administrative Adjustment	0.18	0.00
3.1.11	LA-W908 Nonhalogenated Organic Liquids	5.62	(0.19) (4.49)	Shipped to Perma-Fix 7/31/01 Administrative Adjustment	0.94	0.00
3.1.11	LA-W909 Bulk Oils	2.79	0.36 (1.07)	Newly Generated Administrative Adjustment	2.08	0.00
3.1.11	LA-W910 PCB Wastes with RCRA Components	3.96	1.85	Administrative Adjustment	5.81	2.0
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.32	(0.08)	Administrative Adjustment	1.24	0.00
3.2	LA-W924 Lead Wastes – TBD	5.25	(3.06) (1.51)	Shipped to GTS 12/12/00 Shipped to Envirocare 12/12/00	0.68	0.00
3.2	LA-W925 Mercury Wastes – TBD	6.19	(2.70) 3.24 0.38	Shipped to GTS 7/27.01 Administrative Adjustment Newly Generated	7.11	1.5
3.2	LA-W926 Compressed Gases – TBD	0.00			0.00	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	0.00			0.00	0.00
3.2	LA-W928 Dewatered Treatment Sludge	0.00			0.00	0.00
3.2	LA-W932 Explosives	0.004	0.0002	Administrative Adjustment	0.0042	0.00
3.2	LA-W933 Lab Packs	1.00	1.65 0.043	Administrative Adjustment Newly Generated	2.7	2.00
3.2	LA-W934 High Activity Waste	5.1	0.112	Administrative Adjustment	5.21	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0.00	0.00		0.00	0.00
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00	0.00		0.00	0.00
3.3.3	LA-W931 Lead Requiring Sorting	0.95	(0.83) (0.12)	Shipped to Envirocare 12/12/01 Administrative Adjustment	0.00	0.00
3.4	Missing/ nonexistent/ TBV category	12.02	0.01	Administrative Adjustment	12.03	N/A
	TOTALS	107.64	(32.5)		75.14	

**FY07 Annual STP Update
Background Volume
5/1/2008**

**Appendix H
Reported STP MLLW Inventories
FY02 Update**

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY01 Annual Update (m ³)	Proposed Revision 13.0 (m ³)	Comments	FY02 Annual Update (m ³)	Projection FY02-FY06 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00				0.00
3.1.1	LA-W902 Scintillation Fluids	0.00				0.00
3.1.2	LA-W903 Lead Blankets	0.00				0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.00			0.00	0.00
3.1.2	LA-W905 ER Soils	0.00				0.00
3.1.3	LA-W906 Aqueous Organic Liquids	0.68	(0.32) (0.95) 0.58	Shipped to Perma-Fix 6/18/02 Shipped to WCS 9/27/02 Administrative Adjustment	0.00	0.00
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	17.13	(0.44) (0.22) (0.47) Rec (0.17) (4.94) (8.52) (0.91) (1.22) (0.11) (0.13)	Shipped to Perma-Fix 1/31/02 Shipped to Perma-Fix 1/31/02 Shipped to Duratek 1/30/02 Shipped to M&EC 2/14/02 Shipped to Perma-Fix 2/13/02 Shipped to Perma-Fix 2/13/02 Shipped to Perma-Fix 2/14/02 Shipped to Perma-Fix 2/14/02 Shipped to Perma-Fix 2/14/02 Shipped to Perma-Fix 6/18/02t Administrative Adjustment	0.00	0.00
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	12.67	(0.00) (1.30) (0.02) (4.88) (0.39) (3.94) (2.12) (0.02)	Shipped 1/31/02 to DSSI Shipped to Perma-Fix 1/31/02 Shipped to Perma-Fix 1/31/02 Shipped to M&EC 2/14/02 Shipped to Perma-Fix 2/14/02 Shipped to Perma-Fix 2/14/02 Shipped to Perma-Fix 2/14/02 Administrative Adjustment	0.00	0.00
3.1.5	LA-W912 Combustible Debris	0.00			0.00	0.00
3.1.5	LA-W921 Activated or Inseparable Lead	0.00			0.00	0.00
3.1.5	LA-W922 Noncombustible Debris	1.31	(0.13) (0.74) (0.84) 0.40	Shipped to Perma-Fix 6/18/02 Shipped to Perma-Fix 7/23/02 Shipped to Envirocare 8/27/02 Administrative Adjustment	0.00	2.00
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0.00			0.00	0.00
3.1.6	LA-W914 Corrosive Solutions	0.00			0.00	0.00
3.1.6	LA-W915 Aqueous Cyanides,	0.00			0.00	0.00

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY01 Annual Update (m ³)	Proposed Revision 13.0 (m ³)	Comments	FY02 Annual Update (m ³)	Projection FY02-FY06 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00				0.00
3.1.1	LA-W902 Scintillation Fluids	0.00				0.00
3.1.2	LA-W903 Lead Blankets	0.00				0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.00			0.00	0.00
3.1.2	LA-W905 ER Soils	0.00				0.00
3.1.3	LA-W906 Aqueous Organic Liquids	0.68	(0.32) (0.95) 0.58	Shipped to Perma-Fix 6/18/02 Shipped to WCS 9/27/02 Administrative Adjustment	0.00	0.00
	Nitrates, Chromates, and Arsenates					
3.1.7	LA-W916 Water-Reactive Wastes	2.69	(0.00) (0.00)	Shipped to Perma-Fix 2/14/02 Shipped to M&EC 8/26/02	2.69	0.01
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.30			0.30	0.00
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.94	(0.53) Rec (0.00)	Onsite Recycling 6/6/02 Shipped to Perma-Fix 8/26/02	1.41	0.00
3.1.10	LA-W920 Elemental Mercury	0.44	(0.26)	Shipped to M&EC 4/24/02*	0.18	
3.1.11	LA-W907 Halogenated Organic Liquids	00.18	(0.00) (0.07) (0.11) (0.20) Rec 0.20	Shipped 1/31/02 to DSSI Shipped to Perma-Fix 1/31/02 Shipped to Perma-Fix 2/13/02 Onsite Recycling Administrative Adjustment	0.00	0.00
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0.94	(0.01) (0.93) (0.00) Rec	Shipped 1/31/02 to DSSI Shipped to Perma-Fix 1/31/02 Onsite Recycling 6/6/02	0.00	0.00
3.1.11	LA-W909 Bulk Oils	2.08	(1.49) Rec (1.20) 0.61	Shipped to Duratek 1/30/02 Shipped to Perma-Fix 7/23/02 Administrative Adjustment	0.00	0.00
3.1.11	LA-W910 PCB Wastes with RCRA Components	5.81	(0.25) Trt	Shipped to Shaw 9/26/02	5.58	2.2

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY01 Annual Update (m ³)	Proposed Revision 13.0 (m ³)	Comments	FY02 Annual Update (m ³)	Projection FY02-FY06 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00				0.00
3.1.1	LA-W902 Scintillation Fluids	0.00				0.00
3.1.2	LA-W903 Lead Blankets	0.00				0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.00			0.00	0.00
3.1.2	LA-W905 ER Soils	0.00				0.00
3.1.3	LA-W906 Aqueous Organic Liquids	0.68	(0.32) (0.95) 0.58	Shipped to Perma-Fix 6/18/02 Shipped to WCS 9/27/02 Administrative Adjustment	0.00	0.00
			0.02	Newly Covered		
3.1.11	LA-W923 Liquid and Solid Oxidizers	1.24	(0.80) (0.00) (0.23) (0.45) 0.24	Shipped to WCS 1/30/02 Shipped 1/31/02 to DSSI Shipped to Perma-Fix 1/31/02 Shipped to Perma-Fix 1/31/02 Administrative Adjustment	0.00	0.00
3.2	LA-W924 Lead Wastes – TBD	0.68	(0.68)	Administrative Adjustment	0.00	
3.2	LA-W925 Mercury Wastes – TBD	7.11	(0.00)* (0.26)	Shipped to M&EC 4/24/02 Shipped to WCS 6/4/02	6.85	1.5
3.2	LA-W926 Compressed Gases – TBD	0.00			0.00	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	0.00			0.00	0.00
3.2	LA-W928 Dewatered Treatment Sludge	0.00			0.00	0.00
3.2	LA-W932 Explosives					

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY01 Annual Update (m ³)	Proposed Revision 13.0 (m ³)	Comments	FY02 Annual Update (m ³)	Projection FY02-FY06 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00				0.00
3.1.1	LA-W902 Scintillation Fluids	0.00				0.00
3.1.2	LA-W903 Lead Blankets	0.00				0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.00			0.00	0.00
3.1.2	LA-W905 ER Soils	0.00				0.00
3.1.3	LA-W906 Aqueous Organic Liquids	0.68	(0.32) (0.95) 0.58	Shipped to Perma-Fix 6/18/02 Shipped to WCS 9/27/02 Administrative Adjustment	0.00	0.00
3.2	LA-W933 Lab Packs	2.7	(0.00) (0.04) (0.26) (0.05) (0.96)	Shipped to WCS 6/4/02 Shipped to Perma-Fix 6/18/02 Shipped to Perma-Fix 8/26/02 Shipped to M&EC 8/26/02 Shipped to Perma-Fix 9/26/02	1.39	2.00
3.2	LA-W934 High Activity Waste	5.21			5.21	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0.00	0.00		0.00	0.00
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00	0.00		0.00	0.00
3.3.3	LA-W931 Lead Requiring Sorting	0.00			0.00	0.00
3.4	Missing/ nonexistent/ TBV category	12.03	(0.00)	Administrative Adjustment	12.03	N/A
	TOTALS	75.14	(39.54)		35.62	

*Correspondence RRES/WD:02-020 inadvertently listed the incorrect volumes for these shipments. The volumes shown are correct.

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY02 Annual Update (m ³)	Proposed Revision 14.0 (m ³)	Comments	FY03 Annual Update (m ³)	Projection FY03-FY07 (m ³)
3.1.1	LA-W901 IPA Wastes	0.00			0.00	0.00
3.1.1	LA-W902 Scintillation Fluids	0.00			0.00	0.00
3.1.2	LA-W903 Lead Blankets	0.00			0.00	0.00
3.1.2	LA-W904 Soil with Heavy Metals	0.00			0.00	0.00
3.1.2	LA-W905 ER Soils	0.00			0.00	0.00
3.1.3	LA-W906 Aqueous Organic Liquids	0.00			0.00	0.00
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	0.00			0.00	0.00
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	0.00			0.00	0.00
3.1.5	LA-W912 Combustible Debris	0.00			0.00	0.00
3.1.5	LA-W921 Activated or Inseparable Lead	0.00	0.92 (0.92)	Expedited Ship Request 4/11/03 Shipped to Envirocare 4/30/03	0.00	0.00
3.1.5	LA-W922 Noncombustible Debris	0.00			0.00	2.00
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0.00			0.00	0.00
3.1.6	LA-W914 Corrosive Solutions	0.00			0.00	0.00
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0.00			0.00	0.00
3.1.7	LA-W916 Water-Reactive Wastes	2.69	(1.19) (0.9)	Shipped to WCS 09/3/2003 Administrative Adjustment	0.60	0.01
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.30			0.30	0.00
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	1.41	(0.60)	Administrative Adjustment	0.81	0.00
3.1.10	LA-W920 Elemental Mercury	0.18	(0.01)	Administrative Adjustment	0.17	

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/ Category	FY02 Annual Update (m ³)	Proposed Revision 14.0 (m ³)	Comments	FY03 Annual Update (m ³)	Projection FY03-FY07 (m ³)
3.1.11	LA-W907 Halogenated Organic Liquids	0.00			0.00	0.00
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0.00			0.00	0.00
3.1.11	LA-W909 Bulk Oils	0.00	0.73 (0.73)	2/14/03 Expedited Shipment Request Shipped to DSSI 2/20/03	0.00	0.00
3.1.11	LA-W910 PCB Wastes with RCRA Components	5.58	(0.62)	Administrative Adjustment	4.96	2.2
3.1.11	LA-W923 Liquid and Solid Oxidizers	0.00	(0.00)	Shipped to Perma Fix 11/21/02	0.00	0.00
3.2	LA-W924 Lead Wastes – TBD	0.00			0.00	
3.2	LA-W925 Mercury Wastes – TBD	6.85	(3.99) (0.59) 0.11	Shipped to Envirocare 12/18/2002 Shipped to WCS 9/3/2003 Administrative Adjustment	2.38	1.5
3.2	LA-W926 Compressed Gases – TBD	0.00			0.00	0.00
3.2	LA-W927 Biochemical Laboratory Wastes	0.00			0.00	0.00
3.2	LA-W928 Dewatered Treatment Sludge	0.00			0.00	0.00
3.2	LA-W932 Explosives					
3.2	LA-W933 Lab Packs	1.39	(0.18) (0.02) (0.21) (0.98)	Shipped to Perma Fix 11/21/02 Shipped to Perma Fix 4/4/03 Shipped to DSSI, M&EC, and Perma Fix 8/21/03 Administrative adjustment	0.00	2.00
3.2	LA-W934 High Activity Waste	5.21	(4.08) 6.02	Shipped to Duratek 8/26/03 Administrative Adjustment	7.15	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0.00	0.00		0.00	0.00
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0.00	0.00		0.00	0.00
3.3.3	LA-W931 Lead Requiring Sorting	0.00			0.00	0.00
3.4	Missing/ nonexistent/ TBV category	12.03	(12.01)	Administrative Adjustment	0.02	N/A
	TOTALS	35.64	(19.25)		16.39	

**FY07 Annual STP Update
Background Volume
5/1/2008**

**Appendix J
Reported STP MLLW Inventories
FY04 Update**

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY03 Annual Update (m3)	Proposed Revision 15.0 (m3)	Comments	FY04 Annual Update (m3)	Projection FY04-FY08 (m3)
3.1.1	LA-W901 IPA Wastes	0	0		0	0
3.1.1	LA-W902 Scintillation Fluids	0	0		0	0
3.1.2	LA-W903 Lead Blankets	0	0		0	0
3.1.2	LA-W904 Soil with Heavy Metals	0	0		0	0
3.1.2	LA-W905 ER Soils	0	0		0	0
3.1.3	LA-W906 Aqueous Organic Liquids	0	0.0001	Newly Generated	0.0001	0
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	0	0		0	0
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	0	0		0	0
3.1.5	LA-W912 Combustible Debris	0	0		0	0
3.1.5	LA-W921 Activated or Inseparable Lead	0	0		0	0
3.1.5	LA-W922 Noncombustible Debris	0	0.2610 (0.2610) 0.0255 (0.0255)	Expedited Shipment to Perma-Fix 1/26/04 Expedited Shipment to Envirocare 4/20/04	0	2
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0	0		0	0
3.1.6	LA-W914 Corrosive Solutions	0	0.0814 (0.0814) 0.0005	Shipped to WCS 4/15/04 Administrative Adjustment	0.0005	0

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY03 Annual Update (m3)	Proposed Revision 15.0 (m3)	Comments	FY04 Annual Update (m3)	Projection FY04-FY08 (m3)
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0	0		0	0
3.1.7	LA-W916 Water-Reactive Wastes	0.6	(0.2127) (0.3724) (0.017) (0.0007) 0.0028	Shipped to DSSI 6/24/04 Shipped to MEC 6/24/04 Shipped to Perma-Fix 1/26/04 Shipped to Perma-Fix 6/24/04 Administrative Adjustment	0	0.01
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.3	0		0.3	0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.81	0		0.81	0
3.1.10	LA-W920 Elemental Mercury	0.17	(0.1147) (0.0023)	Shipped to MEC 06/24/04 Administrative Adjustment	0.053	
3.1.11	LA-W907 Halogenated Organic Liquids	0	0		0	0
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0	0		0	0
3.1.11	LA-W909 Bulk Oils	0	0.2264	Newly Generated	0.2264	0
3.1.11	LA-W910 PCB Wastes with RCRA Components	4.96	(4.0538) (0.1136) 0.0023	Shipped to MEC 09/24/04 Shipped to Envirocare 09/30/04 Administrative Adjustment	0.7949	2.2
3.1.11	LA-W923 Liquid and Solid Oxidizers	0	0.0045 (0.0045)	Shipped to Perma-Fix 1/26/04	0	0

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY03 Annual Update (m3)	Proposed Revision 15.0 (m3)	Comments	FY04 Annual Update (m3)	Projection FY04-FY08 (m3)
3.2	LA-W924 Lead Wastes – TBD	0	0.2082	Newly Generated	0.2082	
3.2	LA-W925 Mercury Wastes – TBD	2.38	0.3700 (0.3700) (0.0820) (0.3987) 0.0154 0.0943	Expedited Shipment to MEC 1/26/04 Shipped to MEC 1/26/04 Shipped to MEC 6/24/04 Newly Generated Administrative Adjustment	2.0090	1.5
3.2	LA-W926 Compressed Gases – TBD	0	0		0	0
3.2	LA-W927 Biochemical Laboratory Wastes	0	0		0	0
3.2	LA-W928 Dewatered Treatment Sludge	0	0		0	0
3.2	LA-W932 Explosives	0	0		0	
3.2	LA-W933 Lab Packs	0	(0.0002) 0.0199 (0.0199) 0.0002	Shipped to MEC 1/26/04 Shipped to Perma-Fix and DSSI 6/24/04 Administrative adjustment	0	2
3.2	LA-W934 High Activity Waste	7.15	(0.2120) (0.7133) (5.0133)	Shipped to Envirocare 12/8/03 Shipped to Envirocare 9/20/04 Administrative Adjustment	1.2114	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0	0		0	0
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0	0		0	0

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY03 Annual Update (m3)	Proposed Revision 15.0 (m3)	Comments	FY04 Annual Update (m3)	Projection FY04-FY08 (m3)
3.3.3	LA-W931 Lead Requiring Sorting	0	0		0	0
3.4	Missing/ nonexistent/ TBV category	0.02	(0.02)	Administrative Adjustment	0	N/A
	TOTALS	16.39	(10.7765)		5.6135	

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY04 Annual Update (m3)	Proposed Revision 16.0 (m3)	Comments	FY05 Annual Update (m3)	Projection FY05-FY10 (m3)
3.1.1	LA-W901 IPA Wastes	0	0		0	0
3.1.1	LA-W902 Scintillation Fluids	0	0		0	0
3.1.2	LA-W903 Lead Blankets	0	0		0	0
3.1.2	LA-W904 Soil with Heavy Metals	0	0		0	0
3.1.2	LA-W905 ER Soils	0	0		0	0
3.1.3	LA-W906 Aqueous Organic Liquids	0.0001	-0.0001	Shipment to MEC 11/9/04	0	0
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	0	0		0	0
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	0	0		0	0
3.1.5	LA-W912 Combustible Debris	0	0		0	0
3.1.5	LA-W921 Activated or Inseparable Lead	0	0		0	0
3.1.5	LA-W922 Noncombustible Debris	0	0		0	2
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0	0		0	0
3.1.6	LA-W914 Corrosive Solutions	0.0005	-0.0005	Shipped to Perma-Fix 11/9/04	0	0
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0	0		0	0

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY04 Annual Update (m3)	Proposed Revision 16.0 (m3)	Comments	FY05 Annual Update (m3)	Projection FY05-FY10 (m3)
3.1.7	LA-W916 Water-Reactive Wastes	0	0		0	
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.3015	-0.1561 -0.1374	Shipped to Onyx 03/25/05 Shipped to Clean Harbors 03/25/05	0.0080	0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.8130	-0.2557 -0.3792 -0.0004 -0.1170 0.0080 -0.0005	Shipped to MEC 02/23/05 Shipped to Onyx 03/25/05 Shipped to PECOS 5/23/05 Shipped to Clean Harbors 03/24/05 Newly Generated Administrative Adjustment	0.0682	0
3.1.10	LA-W920 Elemental Mercury	0.053	-0.053 0.0009	Shipped to Envirocare 11/9/04 Newly Generated	0.0009	
3.1.11	LA-W907 Halogenated Organic Liquids	0	0		0	0
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0	0		0	0
3.1.11	LA-W909 Bulk Oils	0.2264	-0.2264 0.2801 -0.2801 0.212	Shipped to Perma-Fix 12/13/04 Shipped to Perma-Fix 12/13/04 Newly Generated	0.2120	0
3.1.11	LA-W910 PCB Wastes with RCRA Components	0.7949	-0.4550 -0.1060 -0.3217 0.6322 0.0879	Shipped to MEC 11/9/04 Shipped to MEC 11/9/04 Shipped to MEC 09/26/05 Newly Generated Administrative Adjustment	0.6322	2.2

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY04 Annual Update (m3)	Proposed Revision 16.0 (m3)	Comments	FY05 Annual Update (m3)	Projection FY05-FY10 (m3)
3.1.11	LA-W923 Liquid and Solid Oxidizers	0	0	0	0	0
3.2	LA-W924 Lead Wastes – TBD	0.2082	-0.2082 0.0151 -0.0151 0.6245 -0.6245 0.2100	Shipped to Envirocare 9/21/05 Shipped to Envirocare 2/8/05 Shipped to Envirocare 9/21/05 Newly Generated	0.2100	
3.2	LA-W925 Mercury Wastes – TBD	2.0090	-0.6184 -0.0160 -1.0410 -0.0002 0.3426 0.1019	Shipped to MEC 11/9/04 Shipped to MEC 11/9/04 Shipped to Envirocare 2/8/05 Shipped to MEC 09/26/05 Newly Generated Administrative Adjustment	0.7779	1.5
3.2	LA-W926 Compressed Gases – TBD	0	0		0	0
3.2	LA-W927 Biochemical Laboratory Wastes	0	0		0	0
3.2	LA-W928 Dewatered Treatment Sludge	0	0		0	0
3.2	LA-W932 Explosives	0	0		0	
3.2	LA-W933 Lab Packs	0	0.0508 -0.0508 0.2120 -0.2120	Shipped to Perma-Fix 11/9/04 Shipped to Perma-Fix 5/9/05	0	2
3.2	LA-W934 High Activity Waste	1.2114	-0.0065 -0.0530 -0.0198 -0.0189 -0.2082	Shipped to Perma-Fix 3/28/05 Shipped to MEC 3/28/05 Shipped to Duratek 8/23/05 Shipped to ARS for Lab Analysis Reclassified as MTRU	1.7378	0.1

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY04 Annual Update (m3)	Proposed Revision 16.0 (m3)	Comments	FY05 Annual Update (m3)	Projection FY05-FY10 (m3)
			0.8328	Newly Generated		
3.3.1	LA-W930 Lead for Surface Decontamination	0	0		0	0
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0	0		0	0
3.3.3	LA-W931 Lead Requiring Sorting	0	0		0	0
3.4	Missing/ nonexistent/ TBV category	0	0		0	N/A
TOTALS		5.6180	-1.9708		3.6473	

**Appendix L
Reported STP MLLW Inventories
FY06 Update**

**FY07 Annual STP Update
Background Volume
5/1/2008**

TABLE 2.1-2: FY06 MLLW Inventory Detailed Update by Treatability Group

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY05 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY06 Annual Update (m3)	Projection FY06-FY10 (m3)
3.1.1	LA-W901 IPA Wastes	0	0		0	0
3.1.1	LA-W902 Scintillation Fluids	0	0		0	0
3.1.2	LA-W903 Lead Blankets	0	0		0	0
3.1.2	LA-W904 Soil with Heavy Metals	0	0		0	0
3.1.2	LA-W905 ER Soils	0	0		0	0
3.1.3	LA-W906 Aqueous Organic Liquids	0	0		0	0
3.1.4	LA-W911 Organic-Contaminated Combustible Solids	0	0		0	0
3.1.4	LA-W919 Organic-Contaminated Noncombustible Solids	0	0		0	0
3.1.5	LA-W912 Combustible Debris	0	0		0	0
3.1.5	LA-W921 Activated or Inseparable Lead	0	0		0	0
3.1.5	LA-W922 Noncombustible Debris	0	0.0015	Newly generated	0.0015	2
3.1.6	LA-W913 Aqueous Wastes with Heavy Metals	0	0		0	0
3.1.6	LA-W914 Corrosive Solutions	0	0		0	0
3.1.6	LA-W915 Aqueous Cyanides, Nitrates, Chromates, and Arsenates	0	0		0	0
3.1.7	LA-W916 Water-Reactive Wastes	0	0		0	0

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY05 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY06 Annual Update (m3)	Projection FY06-FY10 (m3)
3.1.8	LA-W917 Compressed Gases Requiring Scrubbing	0.0080	0		0.0080	0
3.1.9	LA-W918 Compressed Gases Requiring Oxidation	0.0682	-0.0038 0.0114	Shipped to M&EC 5/22/06 Newly Generated	0.0758	0
3.1.10	LA-W920 Elemental Mercury	0.0009	0		0.0009	
3.1.11	LA-W907 Halogenated Organic Liquids	0	0		0	0
3.1.11	LA-W908 Nonhalogenated Organic Liquids	0	0		0	0
3.1.11	LA-W909 Bulk Oils	0.2120	-0.2120 0.1060 -0.1060 0.0568	Shipped to DSSI 5/3/06 Newly Generated shipped to DSSI 5/3/06 Newly Generated	0.0568	0
3.1.11	LA-W910 PCB Wastes with RCRA Components	0.6322	-0.6322	Shipped to M&EC 12/03/05	0	2.2
3.1.11	LA-W923 Liquid and Solid Oxidizers	0	0	0	0	0
3.2	LA-W924 Lead Wastes – TBD	0.2100	0.6435 -0.1532	Newly Generated Administrative Adjustment	0.7003	
3.2	LA-W925 Mercury Wastes – TBD	0.7779	-0.0028 0.5480	Shipped to M&EC 5/3/06 Newly Generated	1.3231	1.5
3.2	LA-W926 Compressed Gases – TBD	0	0		0	0
3.2	LA-W927 Biochemical Laboratory Wastes	0	0		0	0
3.2	LA-W928 Dewatered Treatment Sludge	0	0		0	0
3.2	LA-W932 Explosives	0	0		0	

**FY07 Annual STP Update
Background Volume
5/1/2008**

CPV Sec.	MWIR Waste ID and Treatability Group/Category	FY05 Annual Update (m3)	Proposed Revision 17.0 (m3)	Comments	FY06 Annual Update (m3)	Projection FY06-FY10 (m3)
3.2	LA-W933 Lab Packs	0	0.0946 -0.0946 0.4164	Newly Generated shipped to Perma-Fix 5/22/06 Newly Generated	0.4164	2
3.2	LA-W934 High Activity Waste	1.7378	-0.2082	Shipped to ESI 7/17/06	1.5296	0.1
3.3.1	LA-W930 Lead for Surface Decontamination	0	0		0	0
3.3.2	LA-W929 Nonradioactive or Suspect Waste Items to be Surveyed	0	0		0	0
3.3.3	LA-W931 Lead Requiring Sorting	0	0		0	0
3.4	Missing/ nonexistent/ TBV category	0	0		0	N/A
TOTALS		3.6470	0.4654		4.1124	

**Fiscal Year 2007 Annual Update for the STP Compliance Plan Volume
Attachment B**

***Los Alamos National Laboratory
Federal Facility Compliance Order
Annual Site Treatment Plan Update
for Fiscal Year 2007***

Compliance Plan Volume

LA-UR-08-2613

May 1, 2008

Los Alamos

NATIONAL LABORATORY

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1.0 INTRODUCTION.

On October 4, 1995, the New Mexico Environment Department (NMED) issued a Federal Facility Compliance Order (FFCO) to the Department of Energy (DOE) and its then management and operating contractor, the University of California (UC) Regents. The FFCO requires Los Alamos National Laboratory (LANL) to implement the Site Treatment Plan (STP) for the treatment of mixed waste at LANL. The STP was written to address treatment capacities and technologies to treat all of LANL’s mixed waste, regardless of the time it was generated. Section VII of the FFCO requires LANL to submit an *Annual Site Treatment Plan Update (Update)* to the NMED each year on or before March 31. On June 1, 2006, Los Alamos National Security, LLC (LANS) replaced UC as operating contractor of LANL at which time LANS assumed responsibility for compliance with the FFCO.

The STP contains two volumes, the Compliance Plan Volume (CPV) and the Background Volume (BV). The FFCO requires that the Annual Update bring the information in both volumes current to the end of the previous federal fiscal year (FY). The update to the CPV contains changes and revisions to the CPV occurring since the previous Annual Update; proposed revisions and amendments, including compliance date changes; a description of waste deleted in accordance with the requirements in Section IX (Deletion of Waste); documentation of new covered waste in accordance with the requirements in Section VIII (Addition of New Covered Waste); and any other changes to the overall schedule in the CPV of the STP. The Annual Update to the CPV identifies changes that require NMED approval as a revision under Section X (Revisions) or an amendment under Section XI (Other Amendments to the STP). This document constitutes the update to the CPV.

1.1 ACTIVITIES COMPLETED DURING FY07.

During FY07, DOE and LANS completed the required CPV Activities on or before their required Compliance Dates as described below in Table 1.1A.

TABLE 1.1 A: FY07 FFCO AND STP MILESTONES

STP or FFCO	STP/FFCO Reference	Title/Text	Treatability Group	Compliance Date*
FFCO	VII.A.	Submit Annual STP Update	N/A	5/1/08
FFCO		Submit STP revisions required by NMED approval modified pages to STP		7/8/08

2.0 CHANGES AND REVISIONS TO THE CPV OCCURRING SINCE THE PREVIOUS ANNUAL UPDATE.

This section describes revisions, amendments, or other changes to the LANL CPV approved in FY07 under the FFCO. The STP Compliance Plan Volume has been modified a number of times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. CPV Appendix A, *Summary of STP/FFCO Chronology*, provides a summary of these CPV changes and of modifications to the FFCO since its issuance. Revision 17.0 was proposed in FY07 and approved during FY08.

2.1 REVISIONS AND AMENDMENTS PROPOSED IN FY07 AND APPROVED IN FY08

Revision 17.0 was submitted to NMED on March 13, 2007, and was approved on June 26, 2008. The purpose of this revision request was to reflect changes in the mixed low-level waste inventories in the LANL CPV of the STP, as described in the Fiscal Year 2006 STP Annual Update. The STP covered waste inventory increased with the addition of newly covered waste during FY07, and decreased with shipments for treatment, recycle or disposal of covered wastes during FY07.

TABLE 2.1 A: EXPEDITED SHIPMENT LETTERS

Request for Expedited Shipment Letter Date	STP Section	MWIR Waste ID	Treatability Group	Volume Proposed to be Shipped (m3)
11/27/2006	3.2	LA-W924	Lead Wastes	0.2271
5/22/2007	3.2	LA-W924	Lead Wastes	0.4164

LANL asked for expedited shipment of "Lead Wastes" MWIR Waste ID LA-W924 waste items to be included in Revision 18 in a letter to NMED dated November 27, 2006.

LANL asked for expedited shipment of "Lead Wastes" MWIR Waste ID LA-W924 waste items to be included in Revision 18 in a letter to NMED dated May 22, 2007.

TABLE 2.1 B: FY07 CORRESPONDENCE

Letter Date	Description	Letter number
11/27/2006	Request for expedited shipment	ENV-RCRA:06-108
1/19/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-013

Letter Date	Description	Letter number
4/12/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-063
4/20/2007	Correction on Notice of completion of off-site waste shipment	ENV-RCRA: 07-068
5/22/2007	Request for expedited shipment	ENV-RCRA: 07-116
6/26/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-161
7/2/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-166
7/25/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-177
11/5/2007	Notice of completion of off-site waste shipment	ENV-RCRA: 07-254
12/11/2007	Request for Extension for LANL STP	ENV-RCRA: 07-273
3/11/2008	LANL Proposed New STP 10-100 nCi/g Treatability Group	ENV-RCRA: 08-055
3/20/2008	Correction on Notice of completion of off-site waste shipment	ENV-RCRA: 08-061
3/20/2008	Correction on Notice of completion of off-site waste shipment	ENV-RCRA: 08-062
3/20/2008	Notice of completion of off-site waste shipment	ENV-RCRA: 08-063
4/1/2008	Email from A. Dye to R. Kay, Subject: Clarification for the Administrative Record	NA
4/18/2008	Mixed TRU Waste Tracking	ENV-RCRA: 08-77
4/21/2008	Request for Extension to Submit FY07 STP Update	ENV-RCRA: 08-79
4/23/2008	Proposed Administrative Adjustments	ENV-RCRA: 08-084
5/8/2008	Response to NMED Notice of Noncompliance	ENV-RCRA: 08-091
6/23/2008	Request for Extension of Milestone Compliance Activity Dates	ENV-RCRA:08-118
7/8/2008	LANL STP FY07 Revision 18 Modified pages	ENV-RCRA:08-141

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 18.0. 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 *FY07 Background Volume Update* and in *Revision Proposal 18.0*.

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 18.0. These additions consist of waste that was placed in storage during FY06

and were proposed to become covered waste in FY07. 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 FY07 *Background Volume Update* and in *Revision Proposal 18.0*.

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

Proposal for extension of milestone activities 3.1.8, 3.1.9 and 3.2 due to the unavailability of off-site treatment technologies for radioactively contaminated compressed gas cylinders and high activity waste will be included with this update as Proposed Revision 18.0.

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 2006 update and Revision 17.0 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 13, 2007.
3. *Approval with Modifications of the Proposed Revision 17.0, Annual Update to Site Treatment Plan, Federal Facilities Compliance Order Los Alamos National Laboratory EPA ID #NM0890010515 LANL-07-019*, to Albert Dye, Los Alamos National Laboratory STP Project Manager and Dave D. Stewart, Department of Energy LASO Interim Waste Management Program Manager, June 26, 2008.

Revision 18.0 Proposal
Attachment C

**LOS ALAMOS NATIONAL LABORATORY SITE TREATMENT PLAN
PROPOSED REVISION 18.0**

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

The purpose of this revision request is to reflect changes in the mixed low-level waste (MLLW) inventories in the Los Alamos National Laboratory (LANL) Compliance Plan Volume (CPV) of the Site Treatment Plan (STP), as described in the Fiscal Year 2007 (FY07) STP *Annual Update*. The changes proposed by this revision to the CPV will allow the added covered wastes to be treated or otherwise managed in accordance with the Activities and Compliance Dates pertaining to each treatability group, as adopted or revised herein. The CPV text changes are indicated in the redline, strikeout version provided in Enclosure D. The revised CPV “clean copy” text is provided as Enclosure E.

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

The Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) are proposing to revise the Compliance Plan Volume text to reflect the following changes in MLLW covered waste inventories, as described in the FY07 STP *Annual Update*:

- Increases and decreases in covered mixed waste inventories due to the addition of newly covered waste and off-site shipments during FY07;
- Extensions of Milestone Activity dates relative to changes in covered mixed waste inventories and current treatment capabilities.

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

Addition of new treatability group

DOE and LANS are requesting that a new section, 3.3.4, and a new treatability group be added to the FY 07 Compliance Plan Volume. The treatability group is LA-W935, “*10-100 nCi/g wastes.*” These mixed low-level wastes were covered under the FY06 STP as mixed TRU waste. As MTRU waste containers are re-assayed, those containers that meet the 10-100 nCi/g criteria, will be managed as mixed low-level waste and the volumes will be reported in the STP as mixed low-level covered waste. The proposed compliance dates for completion of the assaying is 12/01/2013 and the completion of off-site shipping is 12/31/2013.

Addition of newly covered waste

DOE and LANS are requesting that the following waste be added to the STP as covered waste, as described also in the FY07 STP *Annual Update*. The total volume of covered waste that is requested for addition is 40.66 cubic meters. The increase is due primarily to a large volume of waste resulting from the decommissioning of gloveboxes.

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

CPV Section	MWIR Waste ID	Treatability Group	Volume (m ³)
3.1.11	LA-W908	<i>Nonhalogenated Organic Liquids</i>	0.0009
3.2	LA-W924	<i>Lead Wastes – TBD</i>	0.4164
3.2	LA-W925	<i>Mercury Wastes – TBD</i>	0.0379
3.2	LA-W934	<i>High Activity Waste</i>	40.2046
		Total	40.6598

The total volume of newly covered MTRU waste that is requested for addition is 30.2 cubic meters.

Deletion of covered waste

DOE and LANS are requesting that the following covered waste be deleted from the STP, as also described in the FY07 STP *Annual Update*. These covered wastes were either shipped off-site for treatment and disposal or recycling; treated on-site for lead decontamination; or used in treatability studies. The total volume of covered waste that is requested for deletion under this Revision to the CPV is 74.4 cubic meters.

Table X.C.2.a.-2: FY07 STP MLLW Off-Site Shipments for Treatment

Date Shipped	Destination	MWIR #	Treatability Group	Vol. (m ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
12/18/2006	ESI	LA-W924	<i>Lead Wastes</i>	0.2271	00036341 JJK	1/19/2007	3.2
3/5/2007	MEC	LA-W920	<i>Elemental Mercury</i>	0.0009	000363747 JJK	4/12/2007	3.1.10
3/5/2007	MEC	LA-W925	<i>Mercury Wastes – TBD</i>	0.3398	000363747 JJK	4/12/2007	3.2
3/5/2007	PermaFix	LA-W909	<i>Bulk Oils</i>	0.0568	000363746 JJK	4/12/2007	3.1.11
5/21/2007	DSSI	LA-W933	<i>Lab Packs</i>	0.2082	0000363836 JJK	6/26/2007	3.2
5/21/2007	MEC	LA-W918	<i>Compressed Gases Requiring Oxidation</i>	0.0152	000363827JJ K	6/26/2007	3.1.9

Date Shipped	Destination	MWIR #	Treatability Group	Vol. (m ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
5/21/2007	Perma-Fix	LA-W933	Lab Packs	0.2082	000363835 JJK	6/26/2007	3.2
6/4/2007	ESI	LA-W924	Lead Wastes	0.8896	000363858 JJK	7/2/2007	3.2
6/20/2007	MEC	LA-W934	High Activity Waste	4.3722	000363867 JJK	7/25/2007	3.2
9/25/2007	MEC	LA-W934	High Activity Waste	16.656	000365526 JJK	11/5/2007	3.2
9/27/2007	Perma-Fix	LA-W934	High Activity Waste	33.1038	000365528 JJK	11/5/2007	3.2
9/27/2007	Perma-Fix	LA-W934	High Activity Waste	18.3216	00365529 JJK	11/5/2007	3.2
Total Volume				74.3993			

Table X.C.2.a.-3: FY07 STP MLLW Off-Site Shipments for Recycling

Date Shipped	Destination	MWIR #	Treatability Group	Vol (m ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
Total Volume				0.00			

Table X.C.2.a.- 4: FY07STP MLLW On-Site Treatment

MWIR #	Treatability Group	Vol (m ³)	Date NMED Notified	CPV Section
Total Volume		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 ³)	Shipping Manifest No.	Date NMED Notified	CPV Section
Total Volume				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 ³)	Comments	CPV Section
LA-W918	<i>Compressed Gases Requiring Oxidation</i>	-0.0004	Volume Correction	3.1.9
LA-W925	<i>Mercury Wastes - TBD</i>	-0.3398	Volume Correction (container volume double counted)	3.2
LA-W934	<i>High Activity Waste</i>	0.4164	Transfer from mixed TRU inventory	3.2
LA-W934	<i>High Activity Waste</i>	85.5702	Transfer from mixed TRU inventory	3.2
LA-W934	<i>High Activity g Waste</i>	-13.1166	Transfer to LA-W935	3.2
LA-W935	<i>10 - 100 nCi/g Waste</i>	13.1166	Transfer from LA-W934	3.3.4
<i>Net Total</i>		85.6464		

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

Milestone Activity	Treatability Group	Revision 17 Compliance Date	Proposed Extended Compliance Date	Rationale for Extension
3.1.8(A)	<i>LA-W917 Compressed Gases Requiring Scrubbing</i>	08/28/2008	08/28/2009	An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream.
3.1.9(A)	<i>LA-W918 Compressed Gases Requiring Oxidation</i>	08/28/2008	08/28/2009	An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream.
3.1.11(A)	<i>LA-W908 Nonhalogenated Organic Liquids</i>	12/31/2007	12/31/2009	An extension of this Compliance Date is requested to secure offsite treatment and to complete shipment of this waste stream newly generated in FY07.
3.2(J)	<i>LA-W934 High Activity Wastes LA-W925 Mercury Wastes LA-W933 Lab Packs LA-W924 Lead Wastes</i>	12/31/2008	12/31/2010	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, some treatability groups includes waste stream items newly generated in FY07.

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

Addition of newly covered waste

The increases in covered waste inventory as of the end of FY07 are attributed primarily to waste that was newly generated in FY06 which was not treated within 12 months of generation, thereby becoming covered waste during FY07. Approval of these proposed additions to the STP inventory will allow the added covered wastes to be treated or otherwise managed in accordance with the activities and compliance dates pertaining to each treatability group, as adopted or revised herein.

Deletion of covered waste

The decreases in covered waste inventory reflect the treatment and disposal or recycling of covered waste at off-site commercial facilities, or the participation in treatability studies during FY07. Deletion of this covered waste is proposed in order to more accurately reflect the LANL STP inventory as of the end of FY07.

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

Administrative adjustments are due to discrepancies found during quality control activities related to preparing waste for treatment and disposal. These adjustments result in additions of newly found covered waste, transfers of waste to other treatability groups, or transfers of waste to the *missing/nonexistent/TBV* category of the STP. The adjustments to the original (October 4, 1995) STP covered waste inventory are proposed in order to more accurately reflect the LANL STP inventory as of the end of FY07.

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

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

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

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

Proposed Revision Text
Attachment D

1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN VOLUME.

1.1 Introduction.

On October 6, 1992, Congress passed the Federal Facility Compliance Act (FFC Act) to address compliance by the United States Department of Energy (DOE) with the land disposal restrictions (LDR) for the storage of mixed waste set forth in Section 3004(j) of RCRA. The FFC Act requires the DOE to submit a Site Treatment Plan (STP) for developing treatment capacities and technologies to treat all of the facility's mixed waste, regardless of the time generated, to the standards promulgated pursuant to Section 3004(m) of RCRA. The FFC Act provides that the appropriate regulatory authority, the New Mexico Environment Department (NMED), may approve, approve with modifications or disapprove the STP. Prior to making such a determination, NMED is required by the FFC Act to provide public notice, consider public comments, consult with the Environmental Protection Agency (EPA) and any other state in which a facility affected by the STP is located.

On March 31, 1995, DOE submitted its proposed STP to NMED for the treatment of mixed waste at the Los Alamos National Laboratory (LANL). On April 17, 1995, the public was given notice of and an opportunity to comment to NMED on the draft STP submitted by DOE. After considering public comment and otherwise complying with the FFC Act, NMED determined to approve the draft STP with modifications as provided in this document.

The STP is intended to fulfill the requirements of the FFC Act and establish an enforceable framework to allow DOE and Los Alamos National Security, LLC (Respondents) to achieve full compliance with LDR requirements under the New Mexico Hazardous Waste Act (HWA) and RCRA. The compliance dates set forth herein are enforceable time periods in which Respondents are required to treat or otherwise meet the requirements set forth for LDR under the HWA and RCRA. The STP was fully implemented by a Compliance Order issued by NMED on October 6, 1995.

1.2 Contents

The STP contains two volumes and is intended to bring Respondents into compliance with LDR storage prohibitions under the HWA and RCRA. The Compliance Plan Volume of the STP provides overall schedules, including compliance dates, for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL.

The Compliance Plan includes a schedule for off-site transportation for treatment, or completion of parallel options as defined in each Treatability Group Section, and the treatment of mixed

wastes in full compliance with the HWA and the implementing regulations at 20 NMAC 4.1, which incorporates by reference 40 CFR Parts 260 through 270. The Background Volume of the STP contains progress reports as required in the Compliance Order. Respondents shall carry out the activities described in the STP, including the Compliance Plan Volume of the STP, in accordance with the schedules and requirements set forth in the STP and the Order.

1.3 STP Revisions and Amendments.

The STP Compliance Plan Volume (CPV) has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order (FFCO), as amended and revised. Appendix A to the CPV provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

2.0 COMPLIANCE SCHEDULES

The STP provides overall schedules for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL. The schedules include those activities required to process backlogged and currently generated waste, and include schedules required to establish an overall time frame for achieving compliance with the LDR requirements under the HWA and 20 NMAC 4.1.

2.1 Categories of Activities for Compliance Dates.

The categories of activities for which compliance dates will be provided for different types of treatment approaches in the STP are listed in the tables below. The categories of activities are based on Section 3021(b)(1)(B)(I), (ii), and (iii) of the RCRA, to the extent appropriate.

2.1.1 Plans Where Treatment Technology Exists

For most of the mixed waste, treatment technologies have been identified and developed. For the waste that will be treated on-site, the categories of activities for compliance dates identified in Table I shall apply.

Table I. Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies.

- | | |
|----|---|
| A. | Submit permit applications to the NMED. |
| B. | Initiate construction as specified in the NMED permit. |
| C. | Complete system testing and commence operation. |
| D. | Begin treating mixed waste. |
| E. | Complete treatment of existing wastes to applicable regulatory standards. |

2.1.2 Plans Where Technology Must Be Developed.

For some mixed waste, no treatment technologies have been identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated on-site, the categories of activities for compliance dates are identified in Table II and shall apply. Compliance dates for the activities identified in Table II may be found in Section 3.1.

Table II. Categories of Activities for Compliance Dates for Mixed Waste Without Existing Treatment Technologies.

A.	Identify and develop technology.
B.	Submit permit application to NMED; or
C.	Submit a Notification of Intent to perform treatability study to NMED a minimum of 45 days prior to commencement of the study.
D.	Initiate construction as specified in the NMED permit.
E.	Commence systems testing.
F.	Begin treating mixed waste.
G.	Complete treatment of existing wastes to applicable regulatory standards.

2.2 Primary Preferred Treatment.

Off-site treatment is the primary preferred treatment option applicable to all mixed waste streams in the STP inventory. All activities and compliance dates related to the construction, permitting, and operation of on-site treatment skids have been removed from this volume. This change is due to the increased availability of off-site treatment and disposal capacity for mixed waste. Respondents will continue evaluating new commercial and DOE off-site treatment facilities as potential options for managing mixed waste, as they become available.

2.3 Plans for Mixed Waste to be Shipped Off-Site for Treatment.

The preferred alternative for DOE to treat mixed waste is at an off-site facility (at a commercial or non-commercial mixed waste treatment facility), or DOE may pursue parallel treatment options such as recycling/re-use or radiological decontamination. Requirements for waste shipped off-site for recycling are discussed under CPV Section 2.6.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to a non-commercial facility. Notification should be made if possible when DOE is first considering such an option to allow NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed off-site non-commercial treatment option proposed by DOE prior to any shipment by

DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility. Activities for mixed waste to be shipped off-site for treatment/recycling at a non-commercial facility are identified in Table IV.

Should DOE decide to treat or recycle waste at a commercial off-site facility, DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Table. III. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Commercial facility.

- | | |
|----|---|
| A. | Meet all regulatory requirements for shipment. |
| B. | Provide documentation to NMED that waste has been received at an off-site facility for treatment or recycling within 45 working days of receipt of waste at the treatment facility. |

2.3.1 Specific Site Requirements for Non-commercial Treatment Facilities.

Shipment to Idaho National Laboratory.

Prior to shipment, Idaho National Laboratory and Idaho Division of Environmental Quality shall be notified of any pending shipments of waste prior to shipment should DOE ship mixed low-level waste to INEL. Proper procedures including additional approvals (if necessary) and documentation shall be completed prior to the shipment of wastes to INL. Management of post-treatment waste residuals or newly generated waste streams will be in accordance with the requirements of DOE, the State of Idaho and that state where they will be disposed. A modification to LANL's RCRA permit providing for the return of such wastes and/or residues to LANL must be approved by NMED prior to any such return of wastes and/or residuals to LANL. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from INL.

Shipments of low-level mixed wastes to planned facilities (not yet existing) will occur only after that treatment and schedules are approved by DOE-ID and the State of Idaho. Upon approval of the planned treatment facilities, the applicable protocol from the paragraph above will be implemented for mixed wastes to be treated at planned facilities.

Shipment to Oak Ridge Reservation.

In the case that Oak Ridge Reservation (ORR) may not dispose of mixed-waste residues or new waste streams generated from off-site treatment, and they cannot be sent to another facility for disposal, then the residues may return to LANL. Should residual or newly generated waste streams be returned to LANL, the proper permits for the State of New Mexico must exist. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from ORR.

Table IV. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Non-commercial facility.

- | | |
|----|---|
| A. | Request necessary approval from NMED for shipment of waste by category before shipping. |
| B. | Meet all regulatory requirements for off-site shipment. |
| C. | Provide documentation to NMED of confirmation of shipment date within 14 working days prior to sending waste to an off-site facility for treatment, disposal, or recycling, or storage pending treatment, disposal, or recycling. |
| D. | Provide documentation to NMED that waste has been received at an off-site facility for treatment within 45 working days of receipt of waste at the off-site facility. |
| E. | Meet all regulatory requirements to include RCRA Permit modifications for residual or newly generated waste streams after treatment or recycling. |
| F. | Provide documentation to NMED within 30 working days after receipt of residual or newly generated waste streams upon return to LANL. |

2.4 Requirements Pertaining to Radionuclide Separation.

The FFC Act sets additional requirements in cases in which DOE intends to conduct radionuclide separation of mixed waste. Should the DOE determine to do radionuclide separation of such mixed waste, DOE will schedule specific compliance dates based on category activities identified in Table V. "Radionuclide separation" shall mean segregating the radioactive portion of the mixed waste from the hazardous portion of the mixed waste.

Table V. Categories of Activities for Compliance Dates for Radionuclide Separation of Mixed Waste.

- | |
|---|
| <ul style="list-style-type: none">A. Complete an estimate of the volume of waste generated by each case of radionuclide separation.B. Complete an estimate of the volume of waste that would exist or be generated without radionuclide separation.C. Complete an estimate of the costs of waste treatment and disposal if radionuclide separation is used compared with the estimated costs if it is not used.D. Provide the assumptions underlying such estimates of waste volumes and cost estimates.E. Provide characterization methodologies for determining waste type.F. Submit a plan for treating or managing hazardous waste residues, accompanied by a NMED permit application. |
|---|

2.5 Plans Related to Other Mixed Waste Activities.

1. Activities other than the types of activities specifically called for in the FFC Act as requiring schedules are described in this STP. Some of these activities may be associated with schedules which may contain compliance dates related to treatment of the DOE's mixed waste.
2. For mixed waste, which is not sufficiently characterized to allow identification of appropriate treatment, notification of the characterization of such waste shall be in accordance with the annual update process described in the Compliance Order. If such characterization results in the addition or deletion of a treatability group or an increase in volume in a treatability group, a revision would be required pursuant to Section X of the Compliance Order.
3. DOE will notify the NMED when off-site treatability studies are conducted on STP waste. Treatability studies are used to explore alternative treatment options that may be practical for any or all of the STP mixed waste streams. When preparing waste for shipment for an off-site treatability study, DOE will evaluate the potential for incidental waste treatment or secondary waste generation, which are often associated with treatability studies.

2.6 Recycling/Re-Use.

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

Should DOE elect to use recycling facilities in lieu of (or in combination with) treatment, it will follow requirements as if the waste were shipped off-site for treatment. Any and all requirements by the recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the recycling site shall be met by Respondents.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to an off-site non-commercial recycling facility. Notification should be made if possible when DOE is first considering such an option to allow NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed off-site non-commercial recycling option prior to any shipment by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty five (45) working days of receipt of waste at the recycling facility. Activities for mixed waste to be recycled are identified in Table VI.

Should DOE elect to use recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation, that waste was received at a recycling facility.

Table VI. Activities for Mixed Waste to be Recycled.

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

2.7 On-Site Radiological Decontamination.

DOE will pursue on-site radiological surface or external decontamination as a preferred option. No volumetric or internal decontamination processes will be considered or performed. Surface radiological decontamination includes activities such as sand blasting, hand-scrubbing, or electrolytic decontamination. These decontamination activities could result in reducing or removing the radiological contaminant from the waste such that the waste could be recycled in accordance with CPV Section 2.6 (Recycling/Re-Use) or be proposed for deletion in accordance with Section IX (DELETION OF WASTE) of the FFCO.

Activities for mixed waste to be radiologically decontaminated are identified in Table VII.

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

- | |
|---|
| <p>A. Meet all DOE requirements for radiological decontamination.</p> <p>B. Provide documentation to NMED that waste has been received at recycling facility within 45 working days of receipt of waste at the recycling facility; or</p> <p>C. Propose waste for deletion in accordance with Section IX of the FFCO.</p> |
|---|

3.0 MIXED LOW-LEVEL WASTE STREAMS.

This Chapter presents the preferred options to treat mixed low-level waste streams (MLLW, formerly known as LLMW) at LANL. All preferred options not described below must be approved by NMED in accordance with the revision process pursuant to the Compliance Order.

The original October 4, 1995 STP inventory in each MLLW treatability group has been modified through the revision process in the FFCO. The tables in the STP Background Volume (BV) Appendices A-L provide a comprehensive summary of changes to the CPV covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of this revision. In Appendix B, the original STP inventory in each MLLW treatability group is denoted as subgroup 0 of that treatability group (e.g., the original volume of STP treatability group LA-W906 became LA-W906-0). Each revision that has since added volumes to individual treatability groups has resulted in creation of an additional subgroup, having the same number as the revision (e.g., LA-W906-4 was created in Revision 4.0, and LA-W906-5 was created in Revision 5.0).

In most Sections of this chapter, the subgroups of the treatability groups are not shown. In those cases, the Activities and Compliance Dates are applicable to the entire net volume of that treatability group. However, when subgroups of a treatability group have been assigned Activities and Compliance Dates unique to that subgroup, those subgroups are detailed in the text.

3.1 Mixed Waste Streams.

The following subsections summarize MLLW treatability groups.

3.1.1 IPA Wastes and Scintillation Fluids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
IPA wastes	LA-W901	D001, D009, F002, F003, F005	0.00
scintillation fluids	LA-W902	D001, F003, F005	0.00
Totals			0.00

Treatment:

The waste will be treated at an off-site facility that combusts organic liquid waste. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
A. Complete shipping waste	12/30/96*
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

* This activity date refers to the applicable waste in the original treatability group. Please note that one of the items in the original Treatability Group LA-W901 was transferred to Treatability Group LA-W906, in Revision 5.0, approved 12/29/97 by NMED.

3.1.2 Lead Blankets, Soil with Heavy Metals, ER Soils.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
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lead blankets	LA-W903	D007, D008	0.00
soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	0.00
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	0.00
Totals			0.00

Treatment:

The waste will be treated at an off-site facility that stabilizes or macroencapsulates wastes. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
A. Complete shipping waste or complete parallel option	12/30/01
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.3 Aqueous Organic Liquids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
aqueous organic liquids	LA-W906-0 LA-W906-4 LA-W906-5	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	0.00
Totals			0.00

Note: See below for additional wastes in this treatability group

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site treatment facility (commercial or non-commercial) and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	02/09/00
B. Provide documentation to NMED that waste was received at off-site facility or provided notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes.

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
aqueous organic liquids	LA-W906-6	D001, D002, D004, D005, D006,	-
	LA-W906-9	D007, D008, D009, D010, D011,	-
	LA-W906-10	D018, D019, D021, D022, D027,	-
	LA-W906-15	D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	0.0000
Totals			0.0000

Activity	Compliance Dates
C. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	10/1/05
D. Provide documentation to NMED that waste was received at off-site facility or provided notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.4 Organic-Contaminated Combustible Solids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
organic-contaminated combustible solids	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	0.00
Totals			0.00

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D018, D019, D020, D022, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D042, D043, F001, F002, F003, F004, F005	0.00
Totals			0.00

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the

treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	02/14/02
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.5 Combustible Debris, Activated or Inseparable Lead, Noncombustible Debris.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
combustible debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	0.00
Totals			0.00

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
activated or inseparable lead	LA-W921	D008	0.00
noncombustible debris	LA-W922 LA-W922-17	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	0.00 0.0015
Totals			0.0015

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of newly generated wastes to an off-site treatment facility or complete parallel option	12/31/08 <u>12/31/089</u>
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.6 Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
aqueous wastes with heavy metals	LA-W913	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011	0.00
corrosive solutions	LA-W914	D001, D002	0.00
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	0.00
Totals			0.00

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	05/08/01
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.7 Water-Reactive Metals.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
water-reactive wastes	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	0
Totals			0.0

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility he DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE.

DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	12/21/06
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.8 Compressed Gases Requiring Scrubbing.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	0.0080
Totals			0.0080

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/08 8/28/09
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.9 Compressed Gases Requiring Oxidation.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring oxidation	LA-W918	D001, U226	-0.07580.0602
Totals			0.07580.0602

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/08 8/28/09
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.10 Elemental Mercury.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
elemental mercury	LA-W920 LA-W920-16	D006, D009, F005	0 0.00090
Totals			0.00090

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/31/07
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.11 Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components, Liquid and Solid Oxidizers.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
halogenated organic liquids	LA-W907	D001, D002, D003, D007, D009, D010, D011, D018, D019, D022, D028, D029, D035, D043, F001, F002, F003, F004, F005, U077, U080, U226, U227, U228, U236	0.00
nonhalogenated organic liquids	LA-W908 <u>LA-W908-18</u>	D001, D002, D003, D004, D007, D008, D009, D011, D018, D038, D040, F002, F003, F004, F005, U002, U019, U154, U169, U188, U220, U246	0.0009
bulk oils	LA-W909 LA-W909-15 LA-W909-16 LA-W909-17	D002, D004, D005, D006, D007, D008, D009, D010, D011, D021, D027, D039, F001, F002, F003, F005	0 0 0 <u>0.05680</u>
PCB wastes with RCRA components	LA-W910 LA-W910-16	D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D019, D027, D028, D030, D031, D032, D033, D034, D036, D039, D042, D043, F002, F003, F004, F005	0 0
Totals			<u>-0.05680.0009</u>

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
Liquid and solid oxidizers	LA-W923	D001, D003, D005	0.00
Totals			0.00

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Off-site shipments must be completed by February 2002.

Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	12/31/ 07 09
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.2 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done

Treatability Group(s):

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

Note: See below for additional wastes in some of these treatability groups

Treatment:

The following steps will be taken to properly characterize this waste:

- Conduct additional generator interviews
- Prepare a sampling plan for waste not adequately characterized
- Conduct sampling and analysis
- Determine treatment options

Activities for wastes originally belonging to these treatability groups as listed above.

Activity	Compliance Dates
A. Complete generator interviews	10/30/95
B. Complete sampling and analysis plan	1/30/96
C. Complete sampling and analysis	9/30/98
D. Complete determination of treatment options	12/20/98
E. Complete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/01
F. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes and treatability groups:

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
lead wastes - TBD	LA-W924-15		0
	LA-W924-16	D003, D008	0
	LA-W924-17		<u>0.70030</u>
mercury wastes-TBD	LA-W925-4	D003, D007, D008, D009 F001, F002, F005	<u>1.32310.6814</u>
	LA-W925-5		
	LA-W925-6		
	LA-W925-15		
	LA-W925-16		
	LA-W925-17 <u>LA-W925-18</u>		
explosives	LA-W932	D003	0.00
labpacks	LA-W933	D001, D002, D003, D004, D005, D006, D007, D008, D010, F003, F005, D011, P012, P029, P098, P106, P113, P120, U131, U144, U145, U188, U190, U204, U216, U219	<u>0.41640</u>
	LA-W933-17		
high activity waste	LA-W934 LA-W934-16	D001, D003, D008, D009	<u>-1.529642.1506</u>
Totals			<u>3.969442.832</u>

Activities for wastes belonging to these treatability groups and subgroups.

Activity	Compliance Dates
G. Complete sampling and analysis plan	1/30/99
H. Complete sampling and analysis	9/30/01
I. Complete determination of treatment options	12/20/01

J. Complete shipping of wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/31/08 12/31/10
K. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at off-site facility or within 45 days after completion of parallel option

3.3 Plans for Other Types of Activities.

The following subsection summarizes plans for other types of activities.

3.3.1 Lead Decontamination

Treatability Group(s):

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

Note: See below for additional wastes in this treatability group

Treatment:

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.

Activity	Compliance Dates
A. Provide schedule for development of lead processing techniques and options	06/30/96
B. Segregate lead waste into decontamination groupings	07/31/97
C. Complete shipment of wastes to decontamination operations, or	12/02/98
D. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/98
E. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/99
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

The following additional wastes will require management in the second category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	First Category	Second Category	Totals
		Net volume (m ³)	Net volume (m ³)	Net volume (m ³)
lead for surface decontamination	LA-W930-6	0.00	0.00	0.00
Totals		0.00	0.00	0.00

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Dates
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle operations for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/13/00
J. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.3.2 Sorting, Surveying, and Decontamination.

Treatability Group(s):

Treatability group	MWIR waste ID	Net volume (m ³)
nonradioactive or suspect waste items to be surveyed	LA-W929-0(1)	0.00
nonradioactive or suspect waste items to receive RCRA and radiological characterization	LA-W929-0(2)	0.00
nonradioactive or suspect waste items that cannot or should not be sampled	LA-W929-0(3)	0.00
Totals		0.00

Note: See below for additional wastes in this treatability group.

Treatment:

The waste items in part 1 of the original volume in this treatability group will be surveyed using a field operation that will survey waste suspect of radioactive contamination to determine whether it is radioactively contaminated. The work will be done on-site with equipment and staffing provided by LANL or another DOE site. Waste determined not to be radioactively contaminated will be treated using commercial facilities permitted to treat hazardous waste; waste determined to be radioactively contaminated wastes will be assigned to applicable treatability groups and/or sent to offsite facilities for appropriate treatment.

Waste items in part 2 of this treatability group will be surveyed using complete RCRA and radiological sampling and characterization. Waste sampled under this alternative will be treated and disposed as low-level mixed waste; the waste will be assigned to applicable treatability groups and/or sent to off-site facilities for appropriate treatment based on the results of this characterization.

Sampling for this characterization alternative will be conducted in accordance with RCRA SW-846 methods. To ensure an adequate volume of waste material is available for sampling and to maximize the cost effectiveness of the sampling activities, some lab packed and other waste items may be bulked into larger volume containers; all RCRA waste codes will be transferred to the bulked wastes to ensure correct RCRA categorization is maintained. It may be found, when preparing a given drum for sampling, (for example, solid small volume waste items that cannot be sampled in accordance with EPA SW-846 methods) are in fact not amenable to sampling and should have been included in the item count for Group 3 . If visual inspection so indicates, these waste items will be transferred to Group 3 and assigned to applicable treatability groups based on existing knowledge.

Waste items in part 3 of this treatability group which are confirmed not amenable to sampling (e.g., lead-acid batteries, spray paint cans) will be assigned to applicable treatability groups based on existing knowledge. It may be found, when inspecting a given drum, that some items can in fact be sampled in accordance with EPA SW-846 methods and should have been included in the item count for Group 2. If visual inspection so indicates, these waste items will be transferred to Group 2 and sampled accordingly.

Additional compliance dates will be proposed for any waste items in this treatability group found not to have available treatment/disposal options following a complete review of all survey, analytical, or visual inspection data obtained through these processes.

For all waste items in this treatability group, shipment off-site for treatment is a parallel preferred option.

Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within (45) working days of receipt of waste at the treatment facility.

Activities for waste items in part 1 of this treatability group.

Activity	Compliance Dates
A. Complete field survey	10/30/96
B. Submit documentation declaring waste items as nonradioactive, or submit documentation assigning waste items to applicable treatability groups	02/28/97
C. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 2 of this treatability group.

Activity	Compliance Dates
D. Complete RCRA and radiological sampling	01/28/97
E. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipments dates	02/28/97
F. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 3 of this treatability group.

Activity	Compliance Dates
G. Complete visual verification	01/28/97
H. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipments dates	06/30/97
I. Propose additional compliance dates if necessary	09/30/97

Additional wastes:

Treatability group	MWIR waste ID	Net volume (m ³)
Nonradioactive or suspect waste items	LA-W929-5	0.00
Totals		0.00

Activities for items added as subgroup 5 of this treatability group.

Activity	Compliance Dates
J. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	03/31/98
K. Propose additional Compliance Dates if necessary	3/31/98

3.3.3 Lead Requiring Sorting.

Treatability Group(s):

Treatability Group	MWIR waste ID	RCRA Codes	Net Volume (m ³)
Lead requiring sorting	LA-W931	D008	0.00
Totals			0.00

Treatment:

Wastes in this treatability group are generally heterogeneous and will require different treatment processes. Drums will be opened, the contents removed, and the waste repackaged based on appropriate treatment requirements. Wastes in this treatability group are primarily lead pieces, lead shot, and lead-contaminated soils that have been packaged in the same drum.

The wastes will be reclassified to the applicable treatability group after physical separation and repackaging. The wastes will be treated by appropriate technology.

Activities for waste items in this treatability group.

Activity	Compliance Dates
A. Complete sorting	06/01/01
B. Submit documentation assigning waste items to applicable treatability groups. Propose additional compliance dates, if necessary, or	06/01/03
C. Complete shipment of existing waste to off-site facility for treatment, or complete parallel options.	06/01/03

3.3.4 10 – 100 nCi/g waste.

Treatability Group(s):

<u>Treatability Group</u>	<u>MWIR waste ID</u>	<u>RCRA Codes</u>	<u>Net Volume (m³)</u>
<u>10-100 nCi/g</u>	<u>LA-W935</u>	<u>D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D026, D027, D028, D029, D030, D035, D036, D037, D038, D039, D040, D043, F001, F002, F004, F005, F006, F007, F009</u>	<u>-0.0013.1166</u>
<u>Totals</u>			<u>-0.0013.1166</u>

Treatment:

Wastes in this treatability group are a population of legacy drums packaged and managed as mixed TRU (>100 nCi/g) but after assay, are determined to be MLLW (<100 nCi/g). MTRU drums with EPA Code designations in the TRU database that were assayed as LL waste are determined to be MLLW. Once confirmed, these drums are segregated from other TRU waste and stored in a designated MLLW storage area. Waste Profiles are prepared to allow acceptance into the LLW population and relabeled appropriately. A Chemical Waste Disposal Request (CWDR) is prepared to transfer the drums from the TRU database to the ChemLL database. TRU Programs will be notified of the drums transferred from TRU to LLM for evaluation of possible other drums based on waste stream. Central Characterization Project (CCP) will be notified for removal of drums from AK.

The drum numbers will be submitted to Production Control for retrieval and staging as mixed low-level waste (MLLW) prior to off site disposal. The MLLW drums are prepared for treatment and disposal to an off site facility using CCP-AK documentation and on-site and off-site profiles generated for debris or sludge drums.

Activities for waste items in this treatability group.

<u>Activity</u>	<u>Compliance Dates</u>
<u>A. Complete assaying</u>	<u>12/01/13</u>
<u>B. Complete shipment of existing waste to off-site facility for treatment, or complete parallel options.</u>	<u>12/31/13</u>

3.4 Management of "Missing" Items.

Waste Category:

Category	MWIR waste ID	Net volume (m ³)
Missing/nonexistent/TBV	None	0.00
Totals		0.00

Treatment:

During visual inspections and sampling activities in support of STP waste work-off, occasionally an item cannot be found, or it is not located in the containers in which it is expected to be, according to the LANL data files for the waste item. In some instances, such items could not be verified as having ever been received in storage at LANL, and follow-up investigations of the record files revealed that for various reasons, the waste items were never in fact generated, although on paper they were included in the original STP inventory.

Some items have been determined not to exist after visual inspection and document review. When DOE and LANS determine that an STP covered waste item does not exist, transfer of the item to the category called "*Missing/ nonexistent/TBV (to be verified)*", is requested through the

revision process associated with the next *Annual Update*.

DOE will verify the absence of all “*Missing/ nonexistent/TBV*” items container-by-container, as each STP waste item is being sampled, repackaged, or otherwise prepared for on- or off-site treatment. The final verification all “*Missing/ nonexistent/TBV*” items will be completed by April 21, 2004, at which time all remaining MLLW items in the original STP inventory will have been treated. At that time, LANL will request deletion of all missing or non-existent items from the STP.

At any time during the re-verification process, should any of these items be discovered to exist, NMED will be notified, and approval will be requested for assignment of the rediscovered items to the appropriate TG. If necessary, they will be assigned new Activities and Compliance Dates, in accordance with the terms of the FFCO.

The following steps will be taken to verify presence or absence of this waste:

Activity	Compliance Dates
A. Initiate re-verification process on a shipment-by-shipment basis	01/03/98
B. Complete re-verification process	04/21/04
C. Re-assign any existing items to appropriate treatability groups	04/21/04
D. Complete treatment of existing wastes to applicable regulatory standards, or	10/30/04
E. Complete shipping of existing wastes to an off-site treatment facility	10/30/04
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

**CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.**

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been ~~sixteen~~seventeen revisions and three amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's *STP Annual Update*, and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	12/29/97	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	12/29/97	Added volumes reported in FY95 and FY96 <i>Annual Updates</i> (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	11/30/98	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies,
Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	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 ³ of LA-W934 High Activity MLL waste to MTRU waste.
Rev 17.0	STP/CPV	FBD 6/26/2008	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 8/28/0908. Extended CPV Activity 3.1.9(A) Compliance Date to 8/28/0908. Extended CPV Activity 3.2(J) Compliance

<u>Rev 18.0</u>	<u>STP/CPV</u>	<u>TBD</u>	Date to 12/31/4008.
			<u>Added and deleted volumes reported in FY07 Annual Update. Extended CPV Activity 3.1.5(A) Compliance Date to 12/31/09. 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 3.1.11(A) Compliance Date to 12/31/09. Proposed a new Section 3.3.4 for Treatability Group, LA-W935 "10-100 nCi/g waste" with new CPV Activity 3.3.4 (A) Compliance Date 12/01/13 and CPV Activity 3.3.4 (B) Compliance Date 12/31/13. Extended CPV Activity 3.2(J) Compliance Date to 12/31/10.</u>

Proposed text for NMED approval
Attachment E

1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN VOLUME.

1.1 Introduction.

On October 6, 1992, Congress passed the Federal Facility Compliance Act (FFC Act) to address compliance by the United States Department of Energy (DOE) with the land disposal restrictions (LDR) for the storage of mixed waste set forth in Section 3004(j) of RCRA. The FFC Act requires the DOE to submit a Site Treatment Plan (STP) for developing treatment capacities and technologies to treat all of the facility's mixed waste, regardless of the time generated, to the standards promulgated pursuant to Section 3004(m) of RCRA. The FFC Act provides that the appropriate regulatory authority, the New Mexico Environment Department (NMED), may approve, approve with modifications or disapprove the STP. Prior to making such a determination, NMED is required by the FFC Act to provide public notice, consider public comments, consult with the Environmental Protection Agency (EPA) and any other state in which a facility affected by the STP is located.

On March 31, 1995, DOE submitted its proposed STP to NMED for the treatment of mixed waste at the Los Alamos National Laboratory (LANL). On April 17, 1995, the public was given notice of and an opportunity to comment to NMED on the draft STP submitted by DOE. After considering public comment and otherwise complying with the FFC Act, NMED determined to approve the draft STP with modifications as provided in this document.

The STP is intended to fulfill the requirements of the FFC Act and establish an enforceable framework to allow DOE and Los Alamos National Security, LLC (Respondents) to achieve full compliance with LDR requirements under the New Mexico Hazardous Waste Act (HWA) and RCRA. The compliance dates set forth herein are enforceable time periods in which Respondents are required to treat or otherwise meet the requirements set forth for LDR under the HWA and RCRA. The STP was fully implemented by a Compliance Order issued by NMED on October 6, 1995.

1.2 Contents

The STP contains two volumes and is intended to bring Respondents into compliance with LDR storage prohibitions under the HWA and RCRA. The Compliance Plan Volume of the STP provides overall schedules, including compliance dates, for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL.

The Compliance Plan includes a schedule for off-site transportation for treatment, or completion of parallel options as defined in each Treatability Group Section, and the treatment of mixed

wastes in full compliance with the HWA and the implementing regulations at 20 NMAC 4.1, which incorporates by reference 40 CFR Parts 260 through 270. The Background Volume of the STP contains progress reports as required in the Compliance Order. Respondents shall carry out the activities described in the STP, including the Compliance Plan Volume of the STP, in accordance with the schedules and requirements set forth in the STP and the Order.

1.3 STP Revisions and Amendments.

The STP Compliance Plan Volume (CPV) has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order (FFCO), as amended and revised. Appendix A to the CPV provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

2.0 COMPLIANCE SCHEDULES

The STP provides overall schedules for achieving compliance with LDR storage and treatment requirements for mixed waste at LANL. The schedules include those activities required to process backlogged and currently generated waste, and include schedules required to establish an overall time frame for achieving compliance with the LDR requirements under the HWA and 20 NMAC 4.1.

2.1 Categories of Activities for Compliance Dates.

The categories of activities for which compliance dates will be provided for different types of treatment approaches in the STP are listed in the tables below. The categories of activities are based on Section 3021(b)(1)(B)(I), (ii), and (iii) of the RCRA, to the extent appropriate.

2.1.1 Plans Where Treatment Technology Exists

For most of the mixed waste, treatment technologies have been identified and developed. For the waste that will be treated on-site, the categories of activities for compliance dates identified in Table I shall apply.

Table I. Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies.

- | | |
|----|---|
| A. | Submit permit applications to the NMED. |
| B. | Initiate construction as specified in the NMED permit. |
| C. | Complete system testing and commence operation. |
| D. | Begin treating mixed waste. |
| E. | Complete treatment of existing wastes to applicable regulatory standards. |

2.1.2 Plans Where Technology Must Be Developed.

For some mixed waste, no treatment technologies have been identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated on-site, the categories of activities for compliance dates are identified in Table II and shall apply. Compliance dates for the activities identified in Table II may be found in Section 3.1.

Table II. Categories of Activities for Compliance Dates for Mixed Waste Without Existing Treatment Technologies.

- | | |
|----|--|
| A. | Identify and develop technology. |
| B. | Submit permit application to NMED; or |
| C. | Submit a Notification of Intent to perform treatability study to NMED a minimum of 45 days prior to commencement of the study. |
| D. | Initiate construction as specified in the NMED permit. |
| E. | Commence systems testing. |
| F. | Begin treating mixed waste. |
| G. | Complete treatment of existing wastes to applicable regulatory standards. |

2.2 Primary Preferred Treatment.

Off-site treatment is the primary preferred treatment option applicable to all mixed waste streams in the STP inventory. All activities and compliance dates related to the construction, permitting, and operation of on-site treatment skids have been removed from this volume. This change is due to the increased availability of off-site treatment and disposal capacity for mixed waste. Respondents will continue evaluating new commercial and DOE off-site treatment facilities as potential options for managing mixed waste, as they become available.

2.3 Plans for Mixed Waste to be Shipped Off-Site for Treatment.

The preferred alternative for DOE to treat mixed waste is at an off-site facility (at a commercial or non-commercial mixed waste treatment facility), or DOE may pursue parallel treatment options such as recycling/re-use or radiological decontamination. Requirements for waste shipped off-site for recycling are discussed under CPV Section 2.6.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to a non-commercial facility. Notification should be made if possible when DOE is first considering such an option to allow NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed off-site non-commercial treatment option proposed by DOE prior to any shipment by

DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility. Activities for mixed waste to be shipped off-site for treatment/recycling at a non-commercial facility are identified in Table IV.

Should DOE decide to treat or recycle waste at a commercial off-site facility, DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment/recycling facility.

Table. III. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Commercial facility.

- | | |
|----|---|
| A. | Meet all regulatory requirements for shipment. |
| B. | Provide documentation to NMED that waste has been received at an off-site facility for treatment or recycling within 45 working days of receipt of waste at the treatment facility. |

2.3.1 Specific Site Requirements for Non-commercial Treatment Facilities.

Shipment to Idaho National Laboratory.

Prior to shipment, Idaho National Laboratory and Idaho Division of Environmental Quality shall be notified of any pending shipments of waste prior to shipment should DOE ship mixed low-level waste to INEL. Proper procedures including additional approvals (if necessary) and documentation shall be completed prior to the shipment of wastes to INL. Management of post-treatment waste residuals or newly generated waste streams will be in accordance with the requirements of DOE, the State of Idaho and that state where they will be disposed. A modification to LANL's RCRA permit providing for the return of such wastes and/or residues to LANL must be approved by NMED prior to any such return of wastes and/or residuals to LANL. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from INL.

Shipments of low-level mixed wastes to planned facilities (not yet existing) will occur only after that treatment and schedules are approved by DOE-ID and the State of Idaho. Upon approval of the planned treatment facilities, the applicable protocol from the paragraph above will be implemented for mixed wastes to be treated at planned facilities.

Shipment to Oak Ridge Reservation.

In the case that Oak Ridge Reservation (ORR) may not dispose of mixed-waste residues or new waste streams generated from off-site treatment, and they cannot be sent to another facility for disposal, then the residues may return to LANL. Should residual or newly generated waste streams be returned to LANL, the proper permits for the State of New Mexico must exist. DOE will notify the NMED Project Manager in writing as soon as possible, and in any event within thirty (30) working days after receipt of shipment of treatment residuals or newly generated waste streams from ORR.

Table IV. Activities for Mixed Waste to be Shipped Off-Site for Treatment or Recycling at a Non-commercial facility.

- | | |
|----|---|
| A. | Request necessary approval from NMED for shipment of waste by category before shipping. |
| B. | Meet all regulatory requirements for off-site shipment. |
| C. | Provide documentation to NMED of confirmation of shipment date within 14 working days prior to sending waste to an off-site facility for treatment, disposal, or recycling, or storage pending treatment, disposal, or recycling. |
| D. | Provide documentation to NMED that waste has been received at an off-site facility for treatment within 45 working days of receipt of waste at the off-site facility. |
| E. | Meet all regulatory requirements to include RCRA Permit modifications for residual or newly generated waste streams after treatment or recycling. |
| F. | Provide documentation to NMED within 30 working days after receipt of residual or newly generated waste streams upon return to LANL. |

2.4 Requirements Pertaining to Radionuclide Separation.

The FFC Act sets additional requirements in cases in which DOE intends to conduct radionuclide separation of mixed waste. Should the DOE determine to do radionuclide separation of such mixed waste, DOE will schedule specific compliance dates based on category activities identified in Table V. "Radionuclide separation" shall mean segregating the radioactive portion of the mixed waste from the hazardous portion of the mixed waste.

Table V. Categories of Activities for Compliance Dates for Radionuclide Separation of Mixed Waste.

- | |
|---|
| <ul style="list-style-type: none">A. Complete an estimate of the volume of waste generated by each case of radionuclide separation.B. Complete an estimate of the volume of waste that would exist or be generated without radionuclide separation.C. Complete an estimate of the costs of waste treatment and disposal if radionuclide separation is used compared with the estimated costs if it is not used.D. Provide the assumptions underlying such estimates of waste volumes and cost estimates.E. Provide characterization methodologies for determining waste type.F. Submit a plan for treating or managing hazardous waste residues, accompanied by a NMED permit application. |
|---|

2.5 Plans Related to Other Mixed Waste Activities.

1. Activities other than the types of activities specifically called for in the FFC Act as requiring schedules are described in this STP. Some of these activities may be associated with schedules which may contain compliance dates related to treatment of the DOE's mixed waste.
2. For mixed waste, which is not sufficiently characterized to allow identification of appropriate treatment, notification of the characterization of such waste shall be in accordance with the annual update process described in the Compliance Order. If such characterization results in the addition or deletion of a treatability group or an increase in volume in a treatability group, a revision would be required pursuant to Section X of the Compliance Order.
3. DOE will notify the NMED when off-site treatability studies are conducted on STP waste. Treatability studies are used to explore alternative treatment options that may be practical for any or all of the STP mixed waste streams. When preparing waste for shipment for an off-site treatability study, DOE will evaluate the potential for incidental waste treatment or secondary waste generation, which are often associated with treatability studies.

2.6 Recycling/Re-Use.

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

Should DOE elect to use recycling facilities in lieu of (or in combination with) treatment, it will follow requirements as if the waste were shipped off-site for treatment. Any and all requirements by the recycling facility and state regulatory, federal regulatory or other regulatory requirements applicable at the recycling site shall be met by Respondents.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to an off-site non-commercial recycling facility. Notification should be made if possible when DOE is first considering such an option to allow NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed off-site non-commercial recycling option prior to any shipment by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty five (45) working days of receipt of waste at the recycling facility. Activities for mixed waste to be recycled are identified in Table VI.

Should DOE elect to use recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation, that waste was received at a recycling facility.

Table VI. Activities for Mixed Waste to be Recycled.

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

2.7 On-Site Radiological Decontamination.

DOE will pursue on-site radiological surface or external decontamination as a preferred option. No volumetric or internal decontamination processes will be considered or performed. Surface radiological decontamination includes activities such as sand blasting, hand-scrubbing, or electrolytic decontamination. These decontamination activities could result in reducing or removing the radiological contaminant from the waste such that the waste could be recycled in accordance with CPV Section 2.6 (Recycling/Re-Use) or be proposed for deletion in accordance with Section IX (DELETION OF WASTE) of the FFCO.

Activities for mixed waste to be radiologically decontaminated are identified in Table VII.

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

- A. Meet all DOE requirements for radiological decontamination.
- B. Provide documentation to NMED that waste has been received at recycling facility within 45 working days of receipt of waste at the recycling facility; or
- C. Propose waste for deletion in accordance with Section IX of the FFCO.

3.0 MIXED LOW-LEVEL WASTE STREAMS.

This Chapter presents the preferred options to treat mixed low-level waste streams (MLLW, formerly known as LLMW) at LANL. All preferred options not described below must be approved by NMED in accordance with the revision process pursuant to the Compliance Order.

The original October 4, 1995 STP inventory in each MLLW treatability group has been modified through the revision process in the FFCO. The tables in the STP Background Volume (BV) Appendices A-L provide a comprehensive summary of changes to the CPV covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of this revision. In Appendix B, the original STP inventory in each MLLW treatability group is denoted as subgroup 0 of that treatability group (e.g., the original volume of STP treatability group LA-W906 became LA-W906-0). Each revision that has since added volumes to individual treatability groups has resulted in creation of an additional subgroup, having the same number as the revision (e.g., LA-W906-4 was created in Revision 4.0, and LA-W906-5 was created in Revision 5.0).

In most Sections of this chapter, the subgroups of the treatability groups are not shown. In those cases, the Activities and Compliance Dates are applicable to the entire net volume of that treatability group. However, when subgroups of a treatability group have been assigned Activities and Compliance Dates unique to that subgroup, those subgroups are detailed in the text.

3.1 Mixed Waste Streams.

The following subsections summarize MLLW treatability groups.

3.1.1 IPA Wastes and Scintillation Fluids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
IPA wastes	LA-W901	D001, D009, F002, F003, F005	0.00
scintillation fluids	LA-W902	D001, F003, F005	0.00
Totals			0.00

Treatment:

The waste will be treated at an off-site facility that combusts organic liquid waste. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
A. Complete shipping waste	12/30/96*
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

* This activity date refers to the applicable waste in the original treatability group. Please note that one of the items in the original Treatability Group LA-W901 was transferred to Treatability Group LA-W906, in Revision 5.0, approved 12/29/97 by NMED.

3.1.2 Lead Blankets, Soil with Heavy Metals, ER Soils.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)

lead blankets	LA-W903	D007, D008	0.00
soil with heavy metals	LA-W904	D004, D005, D006, D007, D008, D009, D010, D011	0.00
ER soils	LA-W905	D028, D029, F001, F005 D010, D011	0.00
Totals			0.00

Treatment:

The waste will be treated at an off-site facility that stabilizes or macroencapsulates wastes. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Activity	Compliance Dates
A. Complete shipping waste or complete parallel option	12/30/01
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.3 Aqueous Organic Liquids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
aqueous organic liquids	LA-W906-0 LA-W906-4 LA-W906-5	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	0.00
Totals			0.00

Note: See below for additional wastes in this treatability group

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site treatment facility (commercial or non-commercial) and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	02/09/00
B. Provide documentation to NMED that waste was received at off-site facility or provided notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes.

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
aqueous organic liquids	LA-W906-6	D001, D002, D004, D005, D006,	-
	LA-W906-9	D007, D008, D009, D010, D011,	-
	LA-W906-10	D018, D019, D021, D022, D027,	-
	LA-W906-15	D028, D030, D032, D033, D034, D036, D037, D038, D039, D041, D042, D043, F001, F002, F003, F004, F005	0.0000
Totals			0.0000

Activity	Compliance Dates
C. Complete shipment of existing wastes for treatment to an off-site facility or complete parallel option	10/1/05
D. Provide documentation to NMED that waste was received at off-site facility or provided notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.4 Organic-Contaminated Combustible Solids.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
organic-contaminated combustible solids	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	0.00
Totals			0.00

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
organic-contaminated noncombustible solids	LA-W919	D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D015, D018, D019, D020, D022, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D042, D043, F001, F002, F003, F004, F005	0.00
Totals			0.00

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the

treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	02/14/02
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.5 Combustible Debris, Activated or Inseparable Lead, Noncombustible Debris.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
combustible debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	0.00
Totals			0.00

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
activated or inseparable lead	LA-W921	D008	0.00
noncombustible debris	LA-W922 LA-W922-17	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	0.00 0.0015
Totals			0.0015

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of newly generated wastes to an off-site treatment facility or complete parallel option	12/31/08
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.6 Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
aqueous wastes with heavy metals	LA-W913	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011	0.00
corrosive solutions	LA-W914	D001, D002	0.00
aqueous cyanides, nitrates, chromates, and arsenates	LA-W915	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, F007, P029, P098	0.00
Totals			0.00

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	05/08/01
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.7 Water-Reactive Metals.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
water-reactive wastes	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	0
Totals			0.0

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility he DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE.

DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	12/21/06
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.8 Compressed Gases Requiring Scrubbing.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	0.0080
Totals			0.0080

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/09
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.9 Compressed Gases Requiring Oxidation.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring oxidation	LA-W918	D001, U226	0.0602
Totals			0.0602

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/09
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.10 Elemental Mercury.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
elemental mercury	LA-W920	D006, D009, F005	0
	LA-W920-16		0
Totals			0

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/31/07
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.11 Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components, Liquid and Solid Oxidizers.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
halogenated organic liquids	LA-W907	D001, D002, D003, D007, D009, D010, D011, D018, D019, D022, D028, D029, D035, D043, F001, F002, F003, F004, F005, U077, U080, U226, U227, U228, U236	0.00
nonhalogenated organic liquids	LA-W908 LA-W908-18	D001, D002, D003, D004, D007, D008, D009, D011, D018, D038, D040, F002, F003, F004, F005, U002, U019, U154, U169, U188, U220, U246	0.0009
bulk oils	LA-W909	D002, D004, D005, D006,	0
	LA-W909-15	D007, D008, D009, D010,	0
	LA-W909-16	D011, D021, D027, D039,	0
	LA-W909-17	F001, F002, F003, F005	0
PCB wastes with RCRA components	LA-W910	D004, D005, D006, D007,	0
	LA-W910-16	D008, D009, D010, D011, D012, D015, D019, D027, D028, D030, D031, D032, D033, D034, D036, D039, D042, D043, F002, F003, F004, F005	0
Totals			0.0009

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
Liquid and solid oxidizers	LA-W923	D001, D003, D005	0.00
Totals			0.00

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Off-site shipments must be completed by February 2002.

Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	12/31/09
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.2 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done

Treatability Group(s):

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

Note: See below for additional wastes in some of these treatability groups

Treatment:

The following steps will be taken to properly characterize this waste:

- Conduct additional generator interviews
- Prepare a sampling plan for waste not adequately characterized
- Conduct sampling and analysis
- Determine treatment options

Activities for wastes originally belonging to these treatability groups as listed above.

Activity	Compliance Dates
A. Complete generator interviews	10/30/95
B. Complete sampling and analysis plan	1/30/96
C. Complete sampling and analysis	9/30/98
D. Complete determination of treatment options	12/20/98
E. Complete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/01
F. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes and treatability groups:

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
lead wastes - TBD	LA-W924-15		0
	LA-W924-16	D003, D008	0
	LA-W924-17		0
mercury wastes-TBD	LA-W925-4	D003, D007, D008, D009 F001, F002, F005	0.6814
	LA-W925-5		
	LA-W925-6		
	LA-W925-15		
	LA-W925-16		
	LA-W925-17		
LA-W925-18			
explosives	LA-W932	D003	0.00
labpacks	LA-W933	D001, D002, D003, D004, D005, D006, D007, D008, D010, F003, F005, D011, P012, P029, P098, P106, P113, P120, U131, U144, U145, U188, U190, U204, U216, U219	0
	LA-W933-17		
high activity waste	LA-W934	D001, D003, D008, D009	42.1506
	LA-W934-16		
Totals			42.832

Activities for wastes belonging to these treatability groups and subgroups.

Activity	Compliance Dates
G. Complete sampling and analysis plan	1/30/99
H. Complete sampling and analysis	9/30/01
I. Complete determination of treatment options	12/20/01

J. Complete shipping of wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/31/10
K. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at off-site facility or within 45 days after completion of parallel option

3.3 Plans for Other Types of Activities.

The following subsection summarizes plans for other types of activities.

3.3.1 Lead Decontamination

Treatability Group(s):

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

Note: See below for additional wastes in this treatability group

Treatment:

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.

Activity	Compliance Dates
A. Provide schedule for development of lead processing techniques and options	06/30/96
B. Segregate lead waste into decontamination groupings	07/31/97
C. Complete shipment of wastes to decontamination operations, or	12/02/98
D. Determine treatment/disposal or other recycle options for lead waste not acceptable for decontamination	12/02/98
E. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/31/99
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

Additional wastes.

The following additional wastes will require management in the second category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	First Category	Second Category	Totals
		Net volume (m ³)	Net volume (m ³)	Net volume (m ³)
lead for surface decontamination	LA-W930-6	0.00	0.00	0.00
Totals		0.00	0.00	0.00

Activities for wastes belonging to this treatability subgroup.

Activity	Compliance Dates
G. Complete shipment of wastes to decontamination operations, or	12/02/99
H. Determine treatment/disposal or other recycle operations for lead waste not acceptable for decontamination	12/02/99
I. Complete treatment/disposal operations or other recycle operations for lead waste not acceptable for decontamination	07/13/00
J. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

3.3.2 Sorting, Surveying, and Decontamination.

Treatability Group(s):

Treatability group	MWIR waste ID	Net volume (m ³)
nonradioactive or suspect waste items to be surveyed	LA-W929-0(1)	0.00
nonradioactive or suspect waste items to receive RCRA and radiological characterization	LA-W929-0(2)	0.00
nonradioactive or suspect waste items that cannot or should not be sampled	LA-W929-0(3)	0.00
Totals		0.00

Note: See below for additional wastes in this treatability group.

Treatment:

The waste items in part 1 of the original volume in this treatability group will be surveyed using a field operation that will survey waste suspect of radioactive contamination to determine whether it is radioactively contaminated. The work will be done on-site with equipment and staffing provided by LANL or another DOE site. Waste determined not to be radioactively contaminated will be treated using commercial facilities permitted to treat hazardous waste; waste determined to be radioactively contaminated wastes will be assigned to applicable treatability groups and/or sent to offsite facilities for appropriate treatment.

Waste items in part 2 of this treatability group will be surveyed using complete RCRA and radiological sampling and characterization. Waste sampled under this alternative will be treated and disposed as low-level mixed waste; the waste will be assigned to applicable treatability groups and/or sent to off-site facilities for appropriate treatment based on the results of this characterization.

Sampling for this characterization alternative will be conducted in accordance with RCRA SW-846 methods. To ensure an adequate volume of waste material is available for sampling and to maximize the cost effectiveness of the sampling activities, some lab packed and other waste items may be bulked into larger volume containers; all RCRA waste codes will be transferred to the bulked wastes to ensure correct RCRA categorization is maintained. It may be found, when preparing a given drum for sampling, (for example, solid small volume waste items that cannot be sampled in accordance with EPA SW-846 methods) are in fact not amenable to sampling and should have been included in the item count for Group 3 . If visual inspection so indicates, these waste items will be transferred to Group 3 and assigned to applicable treatability groups based on existing knowledge.

Waste items in part 3 of this treatability group which are confirmed not amenable to sampling (e.g., lead-acid batteries, spray paint cans) will be assigned to applicable treatability groups based on existing knowledge. It may be found, when inspecting a given drum, that some items can in fact be sampled in accordance with EPA SW-846 methods and should have been included in the item count for Group 2. If visual inspection so indicates, these waste items will be transferred to Group 2 and sampled accordingly.

Additional compliance dates will be proposed for any waste items in this treatability group found not to have available treatment/disposal options following a complete review of all survey, analytical, or visual inspection data obtained through these processes.

For all waste items in this treatability group, shipment off-site for treatment is a parallel preferred option.

Should DOE decide to treat waste at an off-site non-commercial facility in lieu of plans to treat such waste on-site, the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within (45) working days of receipt of waste at the treatment facility.

Activities for waste items in part 1 of this treatability group.

Activity	Compliance Dates
A. Complete field survey	10/30/96
B. Submit documentation declaring waste items as nonradioactive, or submit documentation assigning waste items to applicable treatability groups	02/28/97
C. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 2 of this treatability group.

Activity	Compliance Dates
D. Complete RCRA and radiological sampling	01/28/97
E. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipments dates	02/28/97
F. Propose additional compliance dates if necessary	4/30/97

Activities for waste items in part 3 of this treatability group.

Activity	Compliance Dates
G. Complete visual verification	01/28/97
H. Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipments dates	06/30/97
I. Propose additional compliance dates if necessary	09/30/97

Additional wastes:

Treatability group	MWIR waste ID	Net volume (m ³)
Nonradioactive or suspect waste items	LA-W929-5	0.00
Totals		0.00

Activities for items added as subgroup 5 of this treatability group.

	Activity	Compliance Dates
J.	Submit documentation assigning waste items to applicable treatability groups or proposing off-site shipment dates	03/31/98
K.	Propose additional Compliance Dates if necessary	3/31/98

3.3.3 Lead Requiring Sorting.

Treatability Group(s):

Treatability Group	MWIR waste ID	RCRA Codes	Net Volume (m ³)
Lead requiring sorting	LA-W931	D008	0.00
Totals			0.00

Treatment:

Wastes in this treatability group are generally heterogeneous and will require different treatment processes. Drums will be opened, the contents removed, and the waste repackaged based on appropriate treatment requirements. Wastes in this treatability group are primarily lead pieces, lead shot, and lead-contaminated soils that have been packaged in the same drum.

The wastes will be reclassified to the applicable treatability group after physical separation and repackaging. The wastes will be treated by appropriate technology.

Activities for waste items in this treatability group.

Activity	Compliance Dates
A. Complete sorting	06/01/01
B. Submit documentation assigning waste items to applicable treatability groups. Propose additional compliance dates, if necessary, or	06/01/03
C. Complete shipment of existing waste to off-site facility for treatment, or complete parallel options.	06/01/03

3.3.4 10 – 100 nCi/g waste.

Treatability Group(s):

Treatability Group	MWIR waste ID	RCRA Codes	Net Volume (m ³)
10-100 nCi/g	LA-W935	D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D026, D027, D028, D029, D030, D035, D036, D037, D038, D039, D040, D043, F001, F002, F004, F005, F006, F007, F009	13.1166
Totals			13.1166

Treatment:

Wastes in this treatability group are a population of legacy drums packaged and managed as mixed TRU (>100 nCi/g) but after assay, are determined to be MLLW (<100 nCi/g). MTRU drums with EPA Code designations in the TRU database that were assayed as LL waste are determined to be MLLW. Once confirmed, these drums are segregated from other TRU waste and stored in a designated MLLW storage area. Waste Profiles are prepared to allow acceptance into the LLW population and relabeled appropriately. A Chemical Waste Disposal Request (CWDR) is prepared to transfer the drums from the TRU database to the ChemLL database. TRU Programs will be notified of the drums transferred from TRU to LLM for evaluation of possible other drums based on waste stream. Central Characterization Project (CCP) will be notified for removal of drums from AK.

The drum numbers will be submitted to Production Control for retrieval and staging as mixed low-level waste (MLLW) prior to off site disposal. The MLLW drums are prepared for treatment and disposal to an off site facility using CCP-AK documentation and on-site and off-site profiles generated for debris or sludge drums.

Activities for waste items in this treatability group.

Activity	Compliance Dates
A. Complete assaying	12/01/13
B. Complete shipment of existing waste to off-site facility for treatment, or complete parallel options.	12/31/13

3.4 Management of "Missing" Items.

Waste Category:

Category	MWIR waste ID	Net volume (m ³)
Missing/nonexistent/TBV	None	0.00
Totals		0.00

Treatment:

During visual inspections and sampling activities in support of STP waste work-off, occasionally an item cannot be found, or it is not located in the containers in which it is expected to be, according to the LANL data files for the waste item. In some instances, such items could not be verified as having ever been received in storage at LANL, and follow-up investigations of the record files revealed that for various reasons, the waste items were never in fact generated, although on paper they were included in the original STP inventory.

Some items have been determined not to exist after visual inspection and document review. When DOE and LANS determine that an STP covered waste item does not exist, transfer of the item to the category called "*Missing/ nonexistent/TBV (to be verified)*", is requested through the

revision process associated with the next *Annual Update*.

DOE will verify the absence of all “*Missing/ nonexistent/TBV*” items container-by-container, as each STP waste item is being sampled, repackaged, or otherwise prepared for on- or off-site treatment. The final verification all “*Missing/ nonexistent/TBV*” items will be completed by April 21, 2004, at which time all remaining MLLW items in the original STP inventory will have been treated. At that time, LANL will request deletion of all missing or non-existent items from the STP.

At any time during the re-verification process, should any of these items be discovered to exist, NMED will be notified, and approval will be requested for assignment of the rediscovered items to the appropriate TG. If necessary, they will be assigned new Activities and Compliance Dates, in accordance with the terms of the FFCO.

The following steps will be taken to verify presence or absence of this waste:

Activity	Compliance Dates
A. Initiate re-verification process on a shipment-by-shipment basis	01/03/98
B. Complete re-verification process	04/21/04
C. Re-assign any existing items to appropriate treatability groups	04/21/04
D. Complete treatment of existing wastes to applicable regulatory standards, or	10/30/04
E. Complete shipping of existing wastes to an off-site treatment facility	10/30/04
F. Provide documentation to NMED that waste was received at off-site facility	Within 45 days of receipt of waste at treatment facility

**CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.**

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been seventeen revisions and three amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's *STP Annual Update*, and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	12/29/97	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	12/29/97	Added volumes reported in FY95 and FY96 <i>Annual Updates</i> (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	11/30/98	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies,
Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	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 ³ of LA-W934 High Activity MLL waste to MTRU waste.
Rev 17.0	STP/CPV	6/26/2008	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 8/28/08. Extended CPV Activity 3.1.9(A) Compliance Date to 8/28/08. Extended CPV Activity 3.2(J) Compliance Date to 12/31/08.

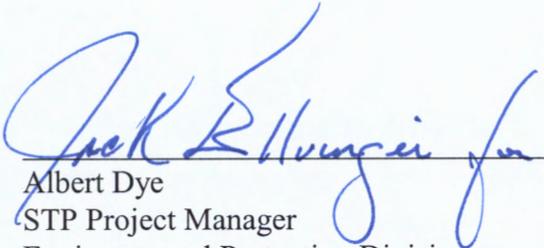
Rev 18.0	STP/CPV	TBD	Added and deleted volumes reported in FY07 <i>Annual Update</i> . Extended CPV Activity 3.1.8(A) Compliance Date to 8/28/09. Extended CPV Activity 3.1.9(A) Compliance Date to 8/28/09. Proposed a new Section 3.3.4 for Treatability Group, LA-W935 "10-100 nCi/g waste" with new CPV Activity 3.3.4 (A) Compliance Date 12/01/13 and CPV Activity 3.3.4 (B) Compliance Date 12/31/13. Extended CPV Activity 3.2(J) Compliance Date to 12/31/10.
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Certification
Attachment F

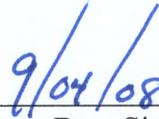
CERTIFICATION

Site Treatment Plan (STP)
Fiscal Year 2007 Annual Update
Revision Proposal 18.0
Los Alamos National Laboratory (LANL)
Federal Facility Compliance Order (FFCO)
October 4, 1995

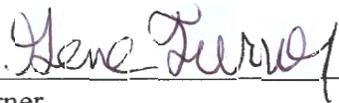
I certify that I am the project manager responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory. To the best of my knowledge and belief, the information in this document is true, accurate, and complete.



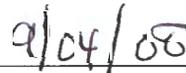
Albert Dye
STP Project Manager
Environmental Protection Division
Los Alamos National Laboratory
Operator



Date Signed



Gene Turner
Environmental Permitting Manager
Los Alamos Site Office
National Nuclear Security Administration
Owner/Operator



Date Signed

ENCLOSURE 2

**NMED JUNE 26, 2008
APPROVAL LETTER FOR
REVISION 17 FY06 STP**

ENTERED



BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 26, 2008

Mr. Albert Dye
Site Treatment Plan Project Manager
Water Quality & RCRA Group
Los Alamos National Security, LLC
PO Box 1663, Mail Stop K490
Los Alamos, NM 87545

Mr. Dave D. Stewart
Interim Waste Management Program Manager
Department of Energy
528 35th Street
Mail Stop A316
Los Alamos, NM 87544

**RE: APPROVAL WITH MODIFICATIONS OF THE PROPOSED REVISION
17.0, ANNUAL UPDATE TO SITE TREATMENT PLAN, FEDERAL
FACILITIES COMPLIANCE ORDER
LOS ALAMOS NATIONAL LABORATORY, EPA ID# NM0890010515
LANL-07-019**

Dear Messrs Dye and Stewart:

The New Mexico Environment Department (NMED) public noticed with modifications the Annual Update, Revision 17.0 (Fiscal Year 2006 (FY06)) of the Department of Energy's (DOE) and Los Alamos National Laboratory's (LANL) (collectively, the Respondents') Site Treatment Plan (STP) of the Federal Facilities Compliance Order (FFCO) issued to the Respondents on October 4, 1995.

No comments were received on the FY06 STP Annual Update Revision 17.0. NMED hereby approves the Respondents' FY06 STP Annual Update Revision 17.0 with the following modifications, as provided in the attachments:

1) Page 4, Revision 17.0 Proposal, Attachment C, Table X.C.2.a.-7: Proposed Extensions of Milestone Activity Compliance Dates (see Table X.C.2.a.-7).-- NMED approved with modifications the addition of treatability groups LA-W-925 Mercury Wastes, LA-W933 Lab Packs, and LA-W924 Lead Wastes, to the column associated with Milestone Activity 3.2(J).

Messrs. Dye and Stewart
June 26, 2008
Page 2

NMED approved with modifications the dates on Table X.C.2.a.-7 for milestone activities 3.1.8(A) 08/28/2008, 3.1.9(A) 08/28/2008 and 3.2(J) 12/31/2008.

2) Page 19, LANL CPV, 3.1.8(A) Treatment for Compressed Gases Requiring Scrubbing – NMED approved with modification the Compliance Date for Activity A as 8/28/2008.

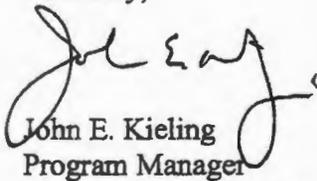
3) Page 20, LANL CPV, 3.1.9(A) Treatment for Compressed Gases Requiring Oxidation – NMED approved with modification the Compliance Date for Activity A as 8/28/2008.

4) Page 27, LANL CPV, 3.2(J) Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done – NMED approved with modification the compliance date of 3.2(J) as 12/31/2008.

5) Page 40, LANL CPV, Appendix A, History of STP Revisions and Amendment, Table A-1, Summary of Changes to the CPV and the FFCO – NMED approved with modifications the compliance dates for Rev 17.0 of the table to reflect the modifications of 3.1.8(A), 3.1.9(A) and 3.2(J) as mentioned above.

If you should have any questions concerning this letter, please contact Rebecca Kay of my staff at (505) 476-6040 or by email at rebecca.kay@state.nm.us.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc: J. Bearzi, NMED-HWB
R. Kay, NMED-HWB
D. Cobrain, NMED-HWB
S. Zappe, NMED-HWB
L. King, EPA 6PD-N
A. Dye, ENV-RCRA, LANS, K490
T. Grieggs, ENV-RCRA, LANL, K490
T. George, ENV-DO, J978
G. Turner, LASO/EO, A316
J. Ellvinger, ENV-RCRA, LANL, K490
File: Reading and LANL FFCO 2008

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

Milestone Activity	Treatability Group	Original Compliance Date	Proposed Compliance Date	Justification for Extension
3.1.5(A)	LA-W922 Noncombustible Debris	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)	LA-W917 Compressed Gases Requiring Scrubbing	08/09/2007	08/28/2008	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)	LA-W918 Compressed Gases Requiring Oxidation	08/09/2007	08/28/2008	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)	LA-W934 High Activity Wastes LA-W925 Mercury Wastes LA-W933 Lab Pucks LA-924 Lead Wastes	12/31/2007	12/31/2008	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.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/08
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.9 Compressed Gases Requiring Oxidation.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring oxidation	LA-W918	D001, U226	0.0758
Totals			0.0758

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

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	12/31/08
K. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at off-site facility or within 45 days after completion of parallel option

3.3 Plans for Other Types of Activities.

The following subsection summarizes plans for other types of activities.

3.3.1 Lead Decontamination

Treatability Group(s):

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

Note: See below for additional wastes in this treatability group

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 ³ 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 Updates</i> , Extended CPV Activity 3.1.5(A) Compliance Date to 12/31/08. Extended CPV Activity 3.1.8(A) Compliance Date to 8/28/08. Extended CPV Activity 3.1.9(A) Compliance Date to 8/28/08. Extended CPV Activity 3.2(J) Compliance Date to 12/31/08.