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*Environmental Protection Division
Risk Reduction Office (ENV-RRO)
P.O. Box 1663, Mail Stop K404
Los Alamos, NM 87545
(505) 667-4348/FAX: (505) 667-0731*

*National Nuclear Security Administration
Los Alamos Site Office, MS A316
Los Alamos, NM 87544
(505) 667-7203/FAX: (505) 665-4504*

Date: April 30, 2009
Refer To: ENV-RRO-09-020

VIA HAND DELIVERY AND CERTIFIED MAIL

RETURN RECEIPT REQUESTED

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: CORRECTION OF OFFSITE WASTE SHIPMENTS, FY08 (3rd and 4th Q),
ACTIVITY 4.0, COMPLIANCE PLAN VOLUME, SITE TREATMENT PLAN,
FEDERAL FACILITY COMPLIANCE ORDER, LOS ALAMOS NATIONAL
LABORATORY**

Based on our discussions earlier this year about increasing the rigor of Site Treatment Plan (STP) reporting, we reviewed historical data during preparation of the FY08 update to the STP. We identified three issues in previous reports that we would like to resolve. On July 24, 2008 and November 10, 2008, respectively, Los Alamos National Laboratory (LANL) notified the New Mexico Environment Department (NMED) of shipments of mixed transuranic (MTRU) waste to the Waste Isolation Pilot Plant (WIPP) in the third and fourth quarters of FY08 (ENV-RCRA-08-150 and ENV-RCRA-222). The three issues with the data are as follows:

1. Three containers of waste had duplicate records; the three containers were reported twice in the fourth quarter of FY08 (ENV-RCRA-08-222),



2. A number of containers (82) of MTRU waste (with a total volume of 15.600 m³) were shipped to WIPP in the third and fourth quarters of FY08 but were not reported in the notifications, and
3. Differences in volume due to repacking may create discrepancies between the volume of waste removed from the STP inventory and the volume of waste shipped to WIPP.

Each of these discrepancies is discussed below.

1. Duplicate containers:

Three containers were reported twice in the report for the fourth quarter of FY08. Table 1 lists the containers and volumes that should be removed from the list of shipped waste (Table 2 in the letter dated November 10, 2008, ENV-RCRA-08-222). These containers had been shipped to WIPP and subsequently returned to LANL. They were reshipped on July 31, 2008 (ENV-RCRA-08-125). The query used for the fourth quarter report identified two shipments and, therefore, resulted in duplicate entries for these containers. Should this situation occur in the future, we will confirm that there are no duplicate entries.

Table 1. Duplicate Containers Reported in FY08 Q4

Treatability Group	Container Number	Volume	Reported Date of Shipment
Cemented sludge	S794304	0.208	7/31/08
Cemented sludge	S804763	0.208	7/31/08
Cemented sludge	S850388	0.208	7/31/08

2. Shipped containers that were not reported:

The database query that we had used for the third and fourth quarters did not fully identify repacked containers that had been shipped. A corrected query, which retrieves data from parent containers to identify STP-covered waste, is now being used to retrieve the shipment data. We do not anticipate further inconsistencies. The corrected query was used in the FY08 update to the STP (LA-UR 09-01880). Table 2 shows the additional volume of waste in each treatability group that was shipped to WIPP in the third and fourth quarters of FY08.

Table 2. Additional Volume of MTRU Waste Shipped to WIPP

FY08 Quarter	Treatability Group	Volume Shipped (m3)
3	Combined combustible and non-combustible waste	10.192
Subtotal for Q3:		10.192
4	Cemented sludge	1.456
4	Combined combustible and non-combustible waste	5.408
Subtotal Q4:		6.864
Total Additional Waste Volume Shipped		17.056

Tables 3 and 4 provide detailed information for the 82 additional STP-covered MTRU waste containers that LANL sent to WIPP during the third and fourth quarters of FY08, respectively.

Table 3. Additional MTRU Waste Shipped to WIPP in the 3rd Q of FY08

STP Section	Generator Acceptable Knowledge Number	WIPP Waste Stream Number	Treatability Group	Shipping Manifest Number	Container Number	Volume Shipped (m3)	Date Shipped
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80111	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80176	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80180	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80187	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80189	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80207	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80266	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80292	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511411JJK	80330	0.208	4/1/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511412JJK	80210	0.208	4/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511412JJK	80294	0.208	4/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511412JJK	80297	0.208	4/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511412JJK	80304	0.208	4/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511412JJK	80323	0.208	4/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511414JJK	80062	0.208	4/3/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511414JJK	80343	0.208	4/3/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511415JJK	80021	0.208	4/7/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511415JJK	80031	0.208	4/7/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511415JJK	80205	0.208	4/7/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511415JJK	80273	0.208	4/7/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511415JJK	80345	0.208	4/7/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511417JJK	80306	0.208	4/8/08

STP Section	Generator Acceptable Knowledge Number	WIPP Waste Stream Number	Treatability Group	Shipping Manifest Number	Container Number	Volume Shipped (m3)	Date Shipped
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511417JJJ	80339	0.208	4/8/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511422JJJ	80235	0.208	4/17/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511422JJJ	80374	0.208	4/17/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511422JJJ	80378	0.208	4/17/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511425JJJ	80362	0.208	4/22/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511425JJJ	80370	0.208	4/22/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80151	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80152	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80227	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80274	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80295	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80298	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511427JJJ	80299	0.208	4/25/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80199	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80328	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80368	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80394	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80395	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80397	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80398	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80400	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511429JJJ	80401	0.208	4/26/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511431JJJ	80366	0.208	5/20/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511431JJJ	80369	0.208	5/20/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511431JJJ	80377	0.208	5/20/08

STP Section	Generator Acceptable Knowledge Number	WIPP Waste Stream Number	Treatability Group	Shipping Manifest Number	Container Number	Volume Shipped (m3)	Date Shipped
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511432JJK	80372	0.208	5/21/08
4	CCP-AK-LANL-10	LA-MHD04.001	Combined combustible and noncombustible waste	001511436JJK	80126	0.208	5/22/08
Total Volume Shipped to WIPP in FY08 Q3						10.192	

Table 3. Additional MTRU Waste Shipped to WIPP in the 4th Quarter of FY08

STP Section	Generator Acceptable Knowledge Number	WIPP Waste Stream Number	Treatability Group	Shipping Manifest Number	Container Number	Volume Shipped (m3)	Date Shipped
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge	001511457JJK	S822070	0.208	9/30/08
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge ¹	001511456JJK	S823705	0.208	9/30/08
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge ¹	001511468JJK	S825048	0.208	9/30/08
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge ¹	001511455JJK	S825083	0.208	9/30/08
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge ¹	001511468JJK	S825105	0.208	9/30/08
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge ¹	001511468JJK	S825112	0.208	9/30/08
4	CCP-AK-LANL-4	LA-MIN03-NC.001	Cemented sludge ¹	001511468JJK	S831821	0.208	9/30/08
Subtotal¹:						1.456	
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80446	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80448	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80450	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80456	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80462	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80483	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80485	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80512	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511448JJK	80529	0.208	9/2/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511455JJK	63135	0.208	9/10/08

STP Section	Generator Acceptable Knowledge Number	WIPP Waste Stream Number	Treatability Group	Shipping Manifest Number	Container Number	Volume Shipped (m3)	Date Shipped
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511456JJK	80505	0.208	9/15/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511456JJK	80575	0.208	9/15/08
4	CCP-AK-LANL-9	LA-MHD03.001	Combined combustible and noncombustible waste	001511456JJK	80581	0.208	9/15/08
4	CCP-AK-LANL-9	LA-MHD03.001	Combined combustible and noncombustible waste	001511457JJK	80454	0.208	9/16/08
4	CCP-AK-LANL-9	LA-MHD03.001	Combined combustible and noncombustible waste	001511457JJK	80460	0.208	9/16/08
4	CCP-AK-LANL-9	LA-MHD03.001	Combined combustible and noncombustible waste	001511457JJK	80466	0.208	9/16/08
4	CCP-AK-LANL-9	LA-MHD03.001	Combined combustible and noncombustible waste	001511457JJK	80499	0.208	9/16/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511458JJK	80390	0.208	9/23/08
4	CCP-AK-LANL-9	LA-MHD03.001	Combined combustible and noncombustible waste	001511465JJK	80452	0.208	9/24/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511465JJK	80561	0.208	9/24/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511465JJK	80573	0.208	9/24/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511465JJK	80630	0.208	9/24/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511465JJK	80636	0.208	9/24/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511465JJK	80657	0.208	9/24/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511468JJK	80626	0.208	9/30/08
4	CCP-AK-LANL-6	LA-MHD01.001	Combined combustible and noncombustible waste	001511468JJK	80660	0.208	9/30/08
Subtotal:						5.408	
Total Volume Shipped to WIPP in FY08 Q4						6.864	

¹ These wastes were repackaged from 85 gal overpacks (0.3215m³) into 55 gal containers (0.208m³) before shipment. Therefore, the volume of *Cemented sludge* removed from the STP inventory is 2.137 m³; the volume of waste reported in Tables 1 and 2 as shipped and received at WIPP is 1.456m³.

Documentation that waste was received at WIPP is provided in Table 3 above. The data in Table 3 are also provided in spreadsheet format on the enclosed compact disk, Enclosure A.

The volume of MTRU waste shipped to WIPP in the third and fourth quarters of FY08 should be adjusted as shown in Tables 4 and 5.

Table 4. MTRU Waste Volume Corrections for FY08 (Q3)

Treatability Group	Volume Shipped (m³) as reported in FY08 Q3	Change in Volume (m³) due to additional shipped containers	Corrected Shipped Volume (m³)
Cemented sludge	56.53	0	56.53
Combined combustible and non-combustible waste	2.29	10.192	12.482
Combustible waste	0.83	0	0.83
Metallic waste	0.42	0	0.42
Total Volume Shipped	60.07	10.192	70.262

Table 5. MTRU Waste Volume Corrections for FY08 (Q4)

Treatability Group	Volume Shipped (m³) as reported in FY08 Q4	Change in Volume (m³) due to removal of duplicates	Change in Volume (m³) due to additional shipped containers	Corrected Shipped Volume (m³)
Cemented sludge	59.32	-0.624	1.456	60.152
Combined combustible and non-combustible waste	6.03	0	5.408	11.438
Combustible waste	1.46	0	0	1.46
Metallic waste	0.83	0	0	0.83
Solidified inorganic and organic solids	0.62	0	0	0.62
Total Volume Shipped	68.26	-0.624	6.864	74.500

3. Volume changes due to repacking:

We also found a discrepancy that could create confusion with respect to waste volumes. Waste volumes are based on the capacity of the waste container. Each overpacked container is recorded as having a volume of 85 gallons (0.3215 m³). Before shipment, however, each overpacked container is repacked in a 55 gallon container (0.208 m³), the standard size container that LANL ships to WIPP. The volume of waste removed from the STP inventory is based on the original overpacked volume, while the shipped-to-WIPP volume, as reflected in the tables, is based on the smaller 55 gallon containers. This difference affects only the volume of *Cemented sludge* in this corrected data. The volume differences do not affect the changes in STP inventory reported in the FY08 STP update (LA-UR 09-01880).

We appreciate the opportunity to correct the discrepancies in the FY08 reports and apologize for any inconvenience. If you have any questions, please contact Peggy Powers at (505) 665-5717 or by email at peggy.powers@lanl.gov or George Henckel at (505) 606-0960 or by email at ghenckel@doeal.gov.

In accordance with the requirements of Section XX, "*Documents, Information, and Reporting Requirements*," of the FFCO, we, as the project managers responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory and for Los Alamos Site Office/National Nuclear Security Administration, certify that, to the best of our knowledge and belief, the information in this document is true, accurate, and complete.

Sincerely,

Sincerely,



Margaret A. Powers
STP Project Manager
Risk Reduction Office (ENV-RRO)
Los Alamos National Laboratory



George C. Henckel, III
STP Project Manager
Los Alamos Site Office
National Nuclear Security Administration

MP/bb

Enclosures: a/s

Cy: James Bearzi, NMED/HWB, Santa Fe, NM, w/enc.
Steve Zappe, NMED/HWB, Santa Fe, NM, w/enc.
John E. Keiling, NMED/HWB, Santa Fe, NM, wo/enc.
Milton L. Bishop, LASO-EO, w/enc., A316
George C. Henckel III, LASO-EO, w/enc, A316
Michael B. Mallory, PADOPS, w/o enc., A102
J. Chris Cantwell, ADESHQ, w/o enc., K491
James Blankenhorn, WDP-DO, w/o enc., J595
Davis Christensen, WDP-TWPS, w/o enc., J595
Paul Newberry, WDP-HMWO, w/o enc., J598
Ellen Louderbough, LC-LESH, w/o enc., A187
Dennis Hjeresen, ENV-RRO, w/o enc., K404
Peggy Powers, ENV-RRO, wo/enc., K404
ENV-DO, File, w/o enc., J978
ENV-RRO, File, w/enc., K490
IRM-RMMSO, w/enc., A150

ENCLOSURE A

CORRECTION OF OFF-SITE WASTE SHIPMENT, FY08, 3rd AND 4th Q

ACTIVITY 4.0 IN THE COMPLIANCE PLAN VOLUME (CPV)

SITE TREATMENT PLAN (STP)

FEDERAL FACILITIES COMPLIANCE ORDER (FFCO)

LOS ALAMOS NATIONAL LABORATORY (LANL)

**Compact disk (CD) containing MS Excel spreadsheet
“Correction of FY 08 Q3 and Q4 WIPP Shipment Reports”**