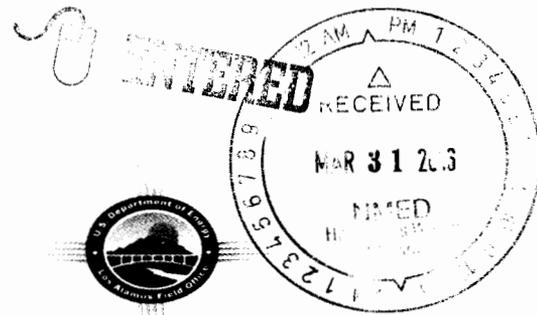




FFCO



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Date: **MAR 31 2016**  
Symbol: WM-DO-16-005  
LA-UR: 16-21514

**RETURN RECEIPT REQUESTED**

Ms. Siona Briley, STP Project Manager  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East Building 1  
Santa Fe, New Mexico 87505-6303

Dear Ms. Briley:

**SUBJECT: SUBMITTAL OF SITE TREATMENT PLAN, FISCAL YEAR 2015 UPDATE AND PROPOSED REVISION 26.0, FEDERAL FACILITY COMPLIANCE ORDER, OCTOBER 4, 1995, LOS ALAMOS NATIONAL LABORATORY**

This letter transmits to the New Mexico Environment Department (NMED) the Los Alamos National Laboratory (LANL) Site Treatment Plan (STP) Fiscal Year 2015 (FY15) Annual Update and requests approval of Proposed Revision 26.0 to the Compliance Plan (CP) of the STP in accordance with requirements of the Federal Facility Compliance Order (FFCO).

This update to the STP follows the format of the FY14 Annual Update. The principal changes consist of the following:

- LANL shipments were on hold while DOE/LANS addresses safety basis concerns. All shipments of MTRU covered waste inventory to offsite facilities were suspended in May 2014 due to the WIPP shutdown. Therefore, no waste is proposed for deletion in Revision 26.0 to the Compliance Plan of the Site Treatment Plan.
- The Confinement Vessel Disposition (CVD) Project started in the summer of 2014 which has had a total of three CVDs transferred to CMR for material retrieval. There is a



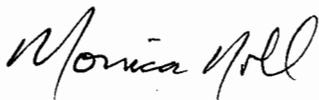
proposed change to the compliance plan schedule for this project in Revision 26.0 to the Compliance Plan of the Site Treatment Plan. This work takes place in a nuclear facility strictly following written operating procedures. When encounters with unforeseen process deviations have occurred, work is paused and placed in a safe configuration until the operating procedure change control process has addressed these deviations.

Enclosure 1 contains two final copies of the FY15 Annual Update and Proposed Revision 26.0. Enclosure 2 is a compact disk with a final copy and a redlined version of the FY15 Annual Update in Microsoft Word.

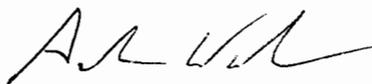
In accordance with the requirements of Section XX of the FFCO, "*Documents, Information, and Reporting Requirements*," we certify, as the project managers responsible for overseeing the implementation of the Site Treatment Plan for the Los Alamos National Laboratory and for Los Alamos Site Office/National Nuclear Security Administration, that, to the best of our knowledge and belief, the information in this document is true, accurate, and complete. If you have any questions, please contact Monica Noll at (505) 667-5999, or by email at [mdn@lanl.gov](mailto:mdn@lanl.gov), or Andrew Worker at (505) 606-0787, or by email at [andrew.worker@nnsa.doe.gov](mailto:andrew.worker@nnsa.doe.gov).

Sincerely,

Sincerely,



Monica Noll  
STP Project Manager  
Waste Management Programs (WM-PROG)  
Los Alamos National Security, LLC



Andrew Worker  
STP Project Manager  
Los Alamos Field Office  
U.S. Department of Energy  
National Nuclear Security Administration

MN/AW:sj

Enclosure:

1. FY15 Annual Update
2. Compact Disk

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# **ENCLOSURE 1**

**FY15 Site Treatment Plan Annual Update**

**WM-DO-16-005**

**LA-UR-16-21514**

**Date:**                     **MAR 3 1 2016**

LA-UR-16-21514

March 31, 2016

**Los Alamos National Laboratory  
Federal Facility Compliance Order  
Annual Site Treatment Plan Update  
for Fiscal Year 2015**



Prepared by the Waste Management Division

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## CONTENTS

<b>ACRONYMS.....</b>	<b>VII</b>
<b>INTRODUCTION .....</b>	<b>1</b>
<b>PART I BACKGROUND UPDATE .....</b>	<b>2</b>
<b>1.0 INTRODUCTION.....</b>	<b>2</b>
<b>2.0 AMOUNT OF EACH COVERED WASTE STORED AT LANL.....</b>	<b>2</b>
2.1 Mixed Low-Level Waste (MLLW) Inventory.....	2
2.2 MTRU Inventory Summary .....	3
<b>3.0 TREATMENT PROGRESS.....</b>	<b>5</b>
3.1 Offsite Treatment .....	5
3.2 Offsite Recycling.....	5
3.3 Onsite Treatment and Recycling .....	5
3.4 Onsite Lead Decontamination .....	5
3.5 Treatability Studies .....	5
3.6 Administrative Adjustments and Corrections.....	5
3.6.1 Adjustments to MLLW Inventory.....	5
3.6.2 Adjustments to MTRU Inventory .....	5
<b>4.0 TREATMENT TECHNOLOGY DEVELOPMENT .....</b>	<b>6</b>
4.1 Treatment Technologies Being Evaluated.....	6
4.1.1 Offsite Commercial Treatment Facilities .....	6
4.1.2 Offsite DOE Treatment Facilities .....	6
<b>5.0 DOE FUNDING FOR STP-RELATED ACTIVITIES .....</b>	<b>6</b>
<b>6.0 TREATMENT VARIANCES.....</b>	<b>6</b>
6.1 WIPP No-Migration Variance Petition/Land Withdrawal Act Amendments.....	7
6.2 Other Treatment Variance(s).....	7
<b>7.0 WIPP FACILITY CAPABILITIES .....</b>	<b>7</b>
7.1 Characterization Capabilities at WIPP .....	8
7.2 MTRU Treatment Capabilities and Plans.....	8
<b>PART II COMPLIANCE PLAN UPDATE.....</b>	<b>9</b>
<b>1.0 INTRODUCTION.....</b>	<b>9</b>
<b>2.0 CHANGES AND REVISIONS TO THE CP OCCURRING SINCE THE PREVIOUS ANNUAL UPDATE .....</b>	<b>9</b>
2.1 Activities Completed During FY15.....	9
2.2 Expedited Shipment Letters .....	9
2.3 Correspondence .....	9
<b>3.0 DESCRIPTION OF DELETED WASTE .....</b>	<b>10</b>
<b>4.0 DOCUMENTATION OF NEW COVERED WASTE .....</b>	<b>10</b>
<b>5.0 PROPOSED CHANGES TO THE CP SCHEDULE .....</b>	<b>10</b>
<b>6.0 DETAILED DESCRIPTION OF THE PROPOSED REVISION .....</b>	<b>11</b>
6.1 Addition of New Covered Waste .....	12
6.1.1 MLLW Additions.....	12
6.1.2 MTRU Waste Additions .....	12
6.2 Deletion of Covered Waste .....	13
6.2.1 Deletion of MLLW .....	13
6.2.2 Deletion of MTRU Waste .....	13
6.2.3 Other Deletions of FY15 Waste.....	13
6.3 Adjustments to the Original (October 4, 1995) STP-Covered MLLW Inventory .....	13
6.4 Adjustments to MTRU Waste Inventory.....	13
6.5 Establishment of New Milestone Activity Dates.....	14
6.6 Additional Revisions .....	14
<b>7.0 RATIONALE FOR THE PROPOSED REVISION.....</b>	<b>14</b>
7.1 Establishment of New Proposed Milestone.....	14
7.2 Addition of New Covered Waste .....	14
7.3 Deletion of Covered Waste .....	14
7.4 Adjustments to the Original (October 4, 1995) STP-Covered Waste Inventory .....	14

<b>8.0</b>	<b>ANTICIPATED LENGTH OF ANY DELAY IN PERFORMANCE .....</b>	<b>14</b>
<b>9.0</b>	<b>PLAN AND SCHEDULE FOR IMPLEMENTING ALL REASONABLE MEASURES .....</b>	<b>14</b>
<b>PART III COMPLIANCE PLAN – PROPOSED REVISION 26.0.....</b>		<b>15</b>
<b>1.0</b>	<b>PURPOSE AND SCOPE OF THE CP .....</b>	<b>15</b>
1.1	Introduction .....	15
<b>1.2</b>	<b>STP Revisions and Amendments .....</b>	<b>15</b>
<b>2.0</b>	<b>COMPLIANCE SCHEDULES .....</b>	<b>15</b>
2.1	Categories of Activities for Compliance Dates .....	15
2.1.1	Plans Where Treatment Technology Exists .....	15
2.1.2	Plans Where Technology Must Be Developed.....	16
2.2	Primary Preferred Treatment.....	16
2.3	Plans for Mixed Waste to be Shipped Offsite for Treatment .....	16
2.3.1	Specific Site Requirements for Noncommercial Treatment Facilities .....	17
2.4	Requirements Pertaining to Radionuclide Separation .....	18
2.5	Plans Related to Other Mixed Waste Activities .....	18
2.6	Recycling/Re-Use.....	18
2.7	Onsite Radiological Decontamination.....	19
<b>3.0</b>	<b>MLLW STREAMS .....</b>	<b>19</b>
3.1	Mixed Waste Streams.....	20
3.1.1	IPA Wastes and Scintillation Fluids.....	20
3.1.2	Lead Blankets, Soil with Heavy Metals, Environmental Restoration (ER) Soils.....	20
3.1.3	Aqueous Organic Liquids .....	20
3.1.4	Organic-Contaminated Combustible Solids.....	21
3.1.5	Combustible Debris, Activated or Inseparable Lead, Noncombustible Debris.....	21
3.1.6	Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.....	22
3.1.7	Water-Reactive Metal .....	22
3.1.8	Compressed Gases Requiring Scrubbing .....	22
3.1.9	Compressed Gases Requiring Oxidation.....	23
3.1.10	Elemental Mercury.....	23
3.1.11	Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, Polychlorinated Biphenyl (PCB) Wastes with RCRA Components, Liquid and Solid Oxidizers .....	23
3.2	Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done <sup>24</sup>	
3.3	Plans for Other Types of Activities .....	25
3.3.1	Lead Decontamination .....	25
3.3.2	Sorting, Surveying, and Decontamination .....	26
3.3.3	Lead Requiring Sorting .....	26
3.3.4	10–100 nCi/g Waste.....	27
3.4	Management of “Missing” Items.....	28
<b>4.0</b>	<b>MTRU WASTE .....</b>	<b>28</b>
4.1	Management of “Missing” Items.....	30
<b>APPENDIX A</b>	<b>CURRENT YEAR MLLW INVENTORY DETAIL .....</b>	<b>32</b>
<b>APPENDIX B</b>	<b>CURRENT YEAR MLLW SHIPMENT DETAIL .....</b>	<b>35</b>
<b>APPENDIX C</b>	<b>CURRENT YEAR MLLW ADMINISTRATIVE ADJUSTMENTS.....</b>	<b>36</b>
<b>APPENDIX D</b>	<b>PREVIOUS YEAR MLLW INVENTORY DETAIL .....</b>	<b>40</b>
<b>APPENDIX E</b>	<b>CURRENT MTRU INVENTORY DETAIL .....</b>	<b>43</b>
<b>APPENDIX F</b>	<b>FY15 MTRU WASTE SHIPMENTS TO WIPP .....</b>	<b>46</b>
<b>APPENDIX G</b>	<b>CURRENT YEAR MTRU INVENTORY – ADMINISTRATIVE ADJUSTMENTS .....</b>	<b>48</b>
<b>APPENDIX H</b>	<b>MLLW TREATMENT FACILITIES .....</b>	<b>50</b>
<b>APPENDIX I</b>	<b>CORRESPONDENCE.....</b>	<b>51</b>
<b>APPENDIX J</b>	<b>HISTORY OF CHANGES TO THE CP AND FFCO .....</b>	<b>52</b>
<b>REFERENCES</b>	<b>.....</b>	<b>55</b>

## TABLES

### Part I

Table 2.1-1	FY15 MLLW Inventory Summary.....	3
Table 2.2-1	Covered MTRU Inventory Summary.....	4
Table 2.1-1	FYXX FFCO and STP Milestones Compilation [Table omitted] .....	9

### Part II

Table 6.1.1-1	Proposed Addition of New-Covered MLLW Waste .....	12
Table 6.1.2-1	Proposed Addition of New Covered <sup>1</sup> MTRU Waste.....	12
Table 6.1.2-2	Proposed Addition of Waste Newly Characterized as MTRU .....	13

### Part III

Table 2.1.1-1	Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies ..	15
Table 2.1.2-1	Categories of Activities for Compliance Dates for Mixed Waste Without Existing Treatment Technologies .....	16
Table 2.3-1	Activities for Offsite Shipment for Treatment or Recycling at a Commercial Facility.....	16
Table 2.3-2	Activities for Shipment Offsite for Treatment or Recycling at a Noncommercial Facility.....	17
Table 2.4-1	Activities for Radionuclide Separation.....	18
Table 2.6-1	Requirements for Recycling.....	19
Table 2.7-1	Activities for Radiological Decontamination .....	19
Table 3.1.1-1	Treatability Groups for IPA Wastes and Scintillation Fluids.....	20
Table 3.1.2-1	Treatability Groups for Lead Blankets, Soil with Heavy Metals, ER Soils.....	20
Table 3.1.3-1	Treatability Groups for Aqueous Organic Liquids.....	20
Table 3.1.3-2	Additional Treatability Groups for Aqueous Organic Liquids.....	21
Table 3.1.4-1	Treatability Groups for Organic-Contaminated Combustible Solids .....	21
Table 3.1.4-2	Treatability Groups for Organic-Contaminated Noncombustible Solids .....	21
Table 3.1.5-1	Treatability Groups for Combustible Lead, Activated or Inseparable Lead, and Noncombustible Debris .....	21
Table 3.1.6-1	Treatability Groups for Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.....	22
Table 3.1.7-1	Treatability Groups for Water-Reactive Metal.....	22
Table 3.1.8-1	Treatability Groups for Compressed Gases Requiring Scrubbing.....	22
Table 3.1.8-2	Activities and Compliance Dates for Compressed Gases Requiring Scrubbing .....	22
Table 3.1.9-1	Treatability Groups for Compressed Gases Requiring Oxidation.....	23
Table 3.1.10-1	Treatability Groups for Elemental Mercury .....	23
Table 3.1.11-1	Treatability Groups for Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components .....	23
Table 3.1.11-2	Additional Treatability Groups.....	24
Table 3.2-1	Treatability Groups for Waste Requiring Characterization or Assessment.....	24
Table 3.2-2	Additional Wastes Requiring Characterization or Assessment .....	24
Table 3.2-3	Activities and Compliance Dates for Wastes Requiring Characterization or Assessment .....	25
Table 3.3.1-1	Treatability Groups for Lead Decontamination.....	25
Table 3.3.1-2	Additional Wastes for Lead Decontamination .....	26
Table 3.3.2-1	Treatability Groups for Sorting, Surveying, and Decontamination.....	26

Table 3.3.2-2	Additional Wastes for Sorting, Surveying, and Decontamination.....	26
Table 3.3.3-1	Treatability Groups for Lead Requiring Sorting .....	26
Table 3.3.4-1	Treatability Groups for 10–100 nCi/g Waste .....	27
Table 3.3.4-2	Activities and Compliance Dates for 10–100 nCi/g Waste .....	27
Table 3.4-1	Waste Category for “Missing Waste” .....	28
Table 4.0-1	Treatability Groups for The Framework Agreement MTRU Waste (remaining original containers) .....	29
Table 4.0-2	Activities and Compliance Dates for MTRU Inventory at TA-55 and CMR from Table E-2 .....	29
Table 4.1-2	Waste Category for “Missing Waste” .....	30
Table 4.1-2	Waste Category for “Missing Waste” – Detail [Table Omitted] .....	30

**Appendix Tables**

Table A-1	FY15 MLLW Inventory Detailed Update by Treatability Group.....	32
Table B-1	MLLW Shipped Offsite for Treatment and Disposal in FY15 <sup>1</sup> .....	35
Table C-1	Administrative Adjustments.....	36
Table C-2	Administrative Adjustment – Detail.....	37
Table D-1	FY14 MLLW Inventory1 Detailed Update by Treatability Group.....	40
Table E-1	TA-54 MTRU Covered Inventory (by Treatability Group).....	43
Table E-2	MTRU Inventory at TA-55 and CMR.....	45
Table F-1	FY15 MTRU Shipments to WIPP.....	46
Table F-2	FY14 MTRU Shipments to WCS <sup>2</sup> .....	46
Table F-3	FY14 MTRU Shipments to AMWTP (INL) <sup>3</sup> .....	46
Table F-4	FY14 MTRU Shipments to WIPP <sup>2</sup> .....	47
Table G-1	FY15 MTRU Administrative Adjustments to TA-54 Inventory .....	48
Table G-2	FY15 MTRU Administrative Adjustments for CMR and TA-55 Inventory .....	49
Table G-3	MTRU Administrative Adjustments – TA-54 Volume Adjustments [Table omitted] .....	49
Table G-4	MTRU Administrative Adjustments – TA-54 Containers Added [Table omitted] .....	49
Table H-1	Commercial Facilities Contacted for Waste Treatment Capabilities.....	50
Table I-1	Expedited Shipment Letters [Table omitted].....	51
Table I-2	Correspondence.....	51
Table J-1	Summary of Changes to the CP and the FFCO .....	52

## **ACRONYMS**

40 CFR	Title 40 of the Code of Federal Regulations
AMWTP	Advanced Mixed Waste Treatment Plant
CCA	Compliance Certification Application
CCP	Central Characterization Project
CMR	Chemistry and Metallurgy Research (Building)
CP	Compliance Plan
CVD	Confinement Vessel Disposition (project)
DOE	U.S. Department of Energy
EM	Environmental Management
EPA	U.S. Environmental Protection Agency
ER	Environmental Restoration
FFCA	Federal Facility Compliance Act
FFCO	Federal Facility Compliance Order
FY	fiscal year
HWA	Hazardous Waste Act
HWB	Hazardous Waste Bureau
INL	Idaho National Laboratory
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
LDR	Land Disposal Restrictions (RCRA)
LLW	low-level waste
LWAA	Land Withdrawal Act Amendments
MLLW	mixed low-level waste
MTRU	mixed transuranic (Waste)
MWIR	Mixed Waste Inventory Report
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PCB	polychlorinated biphenyl
PISA	Potential Inadequacy in the Safety Analysis
RCRA	Resource Conservation and Recovery Act

STP	Site Treatment Plan
SWB	standard waste box
TA	Technical Area
TBD	to be determined
TBV	to be verified
TRU	transuranic
UC	University of California
WCRRF	Waste Characterization, Reduction, and Repacking Facility
WCS	Waste Control Specialists, LLC
WIPP	Waste Isolation Pilot Plant

## **INTRODUCTION**

On October 6, 1992, Congress passed the Federal Facility Compliance Act (FFCA) to address compliance by the U.S. Department of Energy (DOE) with the Land Disposal Restrictions (LDR) for the storage of mixed waste set forth in Section 3004(j) of the Resource Conservation and Recovery Act (RCRA). The FFCA requires 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 the RCRA. The FFCA 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, the FFCA requires NMED to provide public notice, consider public comments, and consult with the U.S. Environmental Protection Agency (EPA) and any other state in which a facility affected by the STP is located.

On October 4, 1995, NMED issued a Federal Facility Compliance Order (FFCO) to DOE and the management and operating contractor, the University of California (UC) Regents. On June 1, 2006, Los Alamos National Security, LLC (LANS) replaced UC as operating contractor of Los Alamos National Laboratory (LANL). LANS then assumed responsibility for FFCO compliance.

The FFCO required DOE/LANS to implement an STP for the treatment of mixed waste at LANL. The STP is intended to fulfill the FFCA requirements and establish an enforceable framework to allow DOE and LANS (Respondents) to achieve full compliance with LDR requirements under the New Mexico Hazardous Waste Act (HWA) and RCRA. The compliance dates set forth in the STP 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.

On March 31, 1995, DOE submitted its proposed STP, which addressed treatment capacities and technologies to treat all of LANL's mixed waste, regardless of the time it was generated, to NMED. On April 17, 1995, the public was provided an opportunity to comment to NMED on DOE's draft STP. After considering public comment and otherwise complying with the FFCA, NMED approved the draft STP with modifications.

Section VII of the FFCO requires DOE/LANS to submit an Annual STP Update to NMED each year on or before March 31. The FFCO requires that the Annual Update bring the information in both the Background and the Compliance Plan (CP) current to the end of the previous federal fiscal year (FY). Part I of this Annual Update constitutes the update to the Background. Part II contains the changes that have occurred since the last Annual Update and also identifies proposed revisions and amendments to the CP. Part III incorporates the changes in Part II into the proposed CP revision (Revision 26.0).

## **PART I BACKGROUND UPDATE**

### **1.0 INTRODUCTION**

The Background (Part I) provides the following information.

- The estimated volume of covered waste in storage at the end of the previous FY and anticipated to be placed in storage for the next five FYs.
- A progress report from the end of the previous federal FY 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.
- A progress report on characterization and/or treatment capabilities or plans for mixed transuranic (MTRU) waste related to the waste treatment standards, if any, for the DOE Waste Isolation Pilot Plant (WIPP) facility near Carlsbad, New Mexico.

The STP-covered waste inventory is verified during quality control activities. Inconsistencies in treatability group or volume between the original inventory and the current inventory may exist. These inconsistencies are reconciled annually with the STP update.

### **2.0 AMOUNT OF EACH COVERED WASTE STORED AT LANL**

#### **2.1 Mixed Low-Level Waste (MLLW) Inventory**

During FY15, STP-covered MLLW inventories increased from approximately 14 m<sup>3</sup> to 36 m<sup>3</sup>. The increase was mainly due to the restricted movements of waste onsite at Area G since early calendar year 2015 while inadequacies with Area G Safety Basis assumptions on combustible waste fraction are being analyzed and corrected. This restriction will delay the final confirmation, characterization, certification, and shipment for offsite treatment and disposal of these containeres until the Safety Basis issues are resolved and the restrictions on moving this waste are lifted. Table 2.1-1 summarizes changes to the estimated FY15 STP-covered MLLW inventory.

Appendix A provides the detailed changes to the FY15 covered MLLW inventory by treatability group, including the inventory at Technical Area (TA) 55 and the Chemistry and Metallurgy Research Building (CMR). Appendix B (Table B-1) lists the FY15 MLLW shipments. Table B-2 identifies other deleted waste. If any, administrative adjustments to the MLLW inventory are shown in Appendix C (Table C-1). Detailed information about the administrative adjustments in Table C-1 are shown in Table C-2. The MLLW inventory reported in the FY14 Annual Update is included as Appendix D.

Table 2.1-1 FY15 MLLW Inventory Summary

Contribution	Volume (m <sup>3</sup> ) <sup>1</sup>
Estimated MLLW Inventory Reported in FY14 Annual Update	13.679
Proposed Revision 26.0	
New Covered Waste	0.644
Administrative Adjustments <sup>2</sup>	21.366
Offsite Treatment	NA <sup>3</sup>
Offsite Recycle	NA <sup>3</sup>
Onsite Decontamination	NA
Treatability Study Use	NA
<b>Estimated MLLW Inventory Reported in FY15 Annual Update</b>	<b>35.689</b>

<sup>1</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322

<sup>2</sup> Includes transfers of MTRU and other wastes into MLLW categories

<sup>3</sup> NA = No Activity

## 2.2 Mixed Transuranic (MTRU) Inventory Summary

During FY15, STP-covered MTRU inventories increased from approximately 916 m<sup>3</sup> to 938 m<sup>3</sup>.

Table 2.2-1 summarizes changes to the estimated FY15 MTRU covered waste inventory. The total volume of MTRU waste in Table 2.2-1 includes the CMR and TA-55 MTRU volumes, which are maintained in a separate inventory from the MTRU inventory at TA-54. Appendix E contains additional detail for the MTRU inventory; Table E-1 covers the TA-54 inventory and Table E-2 covers the inventory at CMR and TA-55. The volume of STP-covered MTRU waste that is part of the “non-cemented above-ground Environmental Management (EM) Legacy TRU” (MTRU waste only) has been summarized in Appendix E-1 and Section 4.0 of the CP. Appendix F (Table F-1) provides a summary of FY15 MTRU shipments to WIPP. In Appendix G, Tables G-1 and G-2 describe the administrative adjustments that were made to resolve differences in the TA-54 and the CMR/TA-55 MTRU inventory data, respectively. DOE/LANS anticipates STP-covered MTRU inventory increases because of the WIPP shutdown as of February 14, 2014.

Administrative adjustments typically represent the following types of activities:

- DOE/LANS may correct database entries so that waste items not previously listed as STP waste are now identified as STP waste.
- DOE/LANS may correct waste data, such as volume or EPA codes, through quality control activities. Under DOE standards, waste that was formerly classified as MTRU because it had radioactivity greater than 10 nCi/g has been reclassified to MLLW (LA-W935) if its activity is less than 100 nCi/g.
- New analytical data may also require that waste streams previously managed as transuranic (TRU) waste should, as a prudent measure, be reclassified and managed as MTRU waste.
- During repacking or other quality control activities, TRU waste may be recharacterized as MTRU waste when previously unidentified hazardous contents, such as lead, are determined to be present.

- During repacking, treatability groups are frequently reassigned to be consistent with current management and shipping criteria.
- Containers of waste are occasionally determined not to belong to mixed waste streams and are reclassified as TRU waste; removal of WIPP-prohibited items, if they are the only hazardous constituent, will result in the remaining waste being classified as nonmixed.
- Addition or removal of 85-gallon overpacks changes the volume of waste in the inventory; rounding container volumes to three decimal places also changes the inventory volume.

Appendix G includes changes to the MTRU waste inventory that resulted from repacking activities. MTRU waste volumes in the STP inventory reflect the volume of the container rather than the volume of the contents. When containers are repacked, the STP inventory volume of any given treatability group may either increase or decrease. When a container is repacked, the contents are sometimes split into two or more new containers to meet shipping and waste acceptance criteria or to meet characterization criteria (e.g., nondestructive analysis calibration limits). In addition, the new containers may be assigned to different treatability groups depending on the contents of each drum. Therefore, the volume of a single drum may ‘multiply’ into more volume than the original container. For example, repacking one container of *Cemented Sludge* (0.208 m<sup>3</sup>) may result in one drum of *Combined Combustible-Noncombustible Waste* (0.208 m<sup>3</sup>) and one drum of *Noncombustible Waste* (0.208 m<sup>3</sup>). In addition, changes in the waste volume in the STP inventory occur when an 85-gallon ‘overpack’ is removed from, or added to, a 55-gallon drum during repackaging. Removal of overpacks decreases the volume of waste in the STP inventory. Adding an overpack to a 55-gallon drum increases the volume of waste shown in the STP inventory.

Table 2.2-1 Covered MTRU Inventory Summary

Description		Volume (m <sup>3</sup> )
Covered MTRU Inventory Reported in FY14 (42.357 m <sup>3</sup> at CMR/TA-55 and 873.759 m <sup>3</sup> at TA-54)		916.116
New Covered MTRU Waste at TA-54		6.038
New Covered MTRU Waste at CMR/TA-55		11.058
Covered MTRU Waste Shipped to WIPP in FY15 below grade		0.0000
Covered MTRU Waste Shipped to WIPP in FY14 remaining above grade (on hold per NMED)	9.048 <sup>1</sup>	
Covered MTRU Waste Shipped to Waste Control Specialists, LLC (WCS), Texas in FY14 (on hold per NMED)	155.718 <sup>1</sup>	
Covered MTRU Waste Shipped to the Advanced Mixed Waste Treatment Plant (AMWTP), Idaho in FY14 (on hold per NMED)	22.892 <sup>1</sup>	
Net Administrative Adjustments for TA-54 in FY14		11.984
Net Administrative Adjustments for CMR/TA-55 in FY14		-7.571
<b>Covered MTRU Inventory at End of FY15</b>		<b>937.625</b>

<sup>1</sup>Volume not to be subtracted from the STP inventory. Removal of this waste from STP inventory is on hold until NMED approval is received.

### **3.0 TREATMENT PROGRESS**

#### **3.1 Offsite Treatment**

DOE/LANS did not ship any STP-covered MLLW offsite for treatment and/or disposal in FY15.

Appendix B summarizes LANL's offsite shipments for treatment and/or disposal of covered MLLW in FY15.

#### **3.2 Offsite Recycling**

DOE/LANS did not recycle any STP-covered MLLW offsite in FY15.

#### **3.3 Onsite Treatment and Recycling**

DOE/LANS did not treat or recycle any STP-covered MLLW onsite in FY15.

#### **3.4 Onsite Lead Decontamination**

No LANL STP-covered MLLW was decontaminated onsite during FY15.

#### **3.5 Treatability Studies**

DOE/LANS conducted no treatability studies in FY15.

#### **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 the STP Annual Update. A data quality review is conducted annually to compare shipment notifications and shipping manifests with database updates.

##### ***3.6.1 Adjustments to MLLW Inventory***

Appendix C (Table C-1) details the administrative adjustments to the MLLW inventory. The principal adjustment reflects the transfer of MTRU waste to MLLW (LA-W935, 10–100 nCi/g). A substantial volume of LANL's STP-covered MTRU waste has been determined to no longer meet the criteria for TRU waste and has been reclassified as MLLW. If previously unidentified hazardous waste constituents, such as lead, are revealed during repacking or other quality control activities, low-level waste may be recharacterized as MLLW. (Appendices C and G).

##### ***3.6.2 Adjustments to MTRU Inventory***

During the preparation of the FY15 STP Annual Update, DOE/LANS identified a number of adjustments to the MTRU inventory volume (Appendix G, Tables G-1 and G-2), including additions of newly-identified STP-covered waste, recharacterization of waste, and reclassification of MTRU waste to MLLW. Other adjustments were needed to account for volume changes due to repacking of waste and transfers of waste from one treatability group to another or to correct database entries.

## **4.0 TREATMENT TECHNOLOGY DEVELOPMENT**

During FY15, the availability of commercial and federal facility offsite 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 prioritized to support offsite 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/LANS continues 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. DOE/LANS is currently developing treatment technologies to address the type of TRU waste associated with the February 14, 2014, release of radioactivity at WIPP. The treatment process is specifically intended to address remaining remediated nitrate salt, unremediated nitrate salt, and cemented nitrate salt wastes remaining at LANL, as required by Settlement Agreement and Stipulated Final Order Hazardous Waste Bureau (HWB) 14-20.

DOE/LANS re-evaluated all nitrate salt-bearing TRU waste and determined the three types of waste located at LANL that will require treatment prior to acceptance at WIPP. Methods for treatment of these wastes are currently under development by DOE/LANS. Methods will utilize surrogates for the waste and both onsite and offsite testing facilities to evaluate treatment effectiveness. After confirmation of the treatment process for these wastes, permitted onsite treatment will be requested from the NMED-HWB.

#### **4.1.1 Offsite Commercial Treatment Facilities**

DOE/LANS continues to monitor the availability and capabilities of offsite commercial facilities for treatment technologies and permitting that are appropriate to LANL waste. These facilities are listed in Appendix H (Table H-1).

#### **4.1.2 Offsite DOE Treatment Facilities**

DOE/LANS continues to monitor the availability and capabilities of offsite DOE facilities for treatment technologies and permitting that are appropriate to LANL waste. In the past, DOE/LANS shipped nine corrugated metal boxes to the Idaho National Laboratory Advanced Mixed Waste Treatment Plant (AMWTP) for treatment. These nine boxes were successfully treated at the AMWTP and are stored at the Waste Control Specialists, LLC (WCS) facility until WIPP is re-opened to ready to accept waste.

## **5.0 DOE FUNDING FOR STP-RELATED ACTIVITIES**

Funding to implement the LANL STP for mixed waste during FY15 was sufficient to meet all compliance dates as required by the CPof the STP. However, DOE/LANS shipments were on hold while DOE/LANS addressed safety basis concerns. FY16 funding is available to support all compliance dates established in the STP. Should funding reductions occur that would affect STP compliance dates, DOE and LANS will so notify NMED to address compliance schedules and activities.

## **6.0 TREATMENT VARIANCES**

RCRA allows certain case-by-case variances from LDR standards. Variances that may be sought under 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/Land Withdrawal Act Amendments**

WIPP, located near Carlsbad, New Mexico, is a DOE repository for TRU waste 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 WIPP Land Withdrawal Act Amendments of 1996 (LWAA) (Public Law 104-201, Section 3188) exempted waste designated by the Secretary of Energy for disposal at WIPP from RCRA's LDRs. Following passage of the LWAA, the 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 LANL. Other facilities have also shipped non-mixed TRU waste to WIPP. NMED issued a hazardous waste permit for WIPP on October 27, 1999, authorizing DOE to manage, store, and dispose of contact-handled MTRU waste at the facility.

### **6.2 Other Treatment Variance(s)**

No treatment variances were requested or granted in FY15.

## **7.0 WIPP FACILITY CAPABILITIES**

As discussed above, DOE is disposing of its defense TRU waste, both mixed and nonhazardous, in its deep geologic repository 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 offsite. On February 2014, NMED received notice of a release at the WIPP nuclear waste repository. A LANL container sent to WIPP experienced an energetic chemical reaction that ultimately led to the release of radioactive material. In light of recent events, and the potential need to re-remediate all nitrate salt-bearing waste, NMED determined that the removal of MTRU from the STP will be deferred until more information becomes available and it is determined that waste currently stored at the WCS facility and WIPP remaining above

grade will not be returned to LANL. All shipments of MTRU covered waste inventory to WIPP were suspended in May 2014 due to the WIPP shutdown.

### **7.1 Characterization Capabilities at WIPP**

Wastes proposed for shipment to WIPP are characterized and certified at LANL by the Central Characterization Project (CCP), a contractor to DOE's Carlsbad Field Office.

### **7.2 MTRU Treatment Capabilities and Plans**

WIPP is not required to treat MTRU waste to meet the LDR standards. As described above, the LWAA exempted wastes designated by the Secretary of Energy for disposal at the WIPP from this requirement.

## **PART II COMPLIANCE PLAN UPDATE**

### **1.0 INTRODUCTION**

This update to the CP contains

- Changes to the CP occurring since the previous Annual Update, including
  - correspondence, including notices of shipments; and
  - new covered and deleted waste;
- Proposed revisions and amendments, including
  - compliance date changes;
  - description of waste deleted in accordance with the requirements in FFCO Section IX, *Deletion of Waste*;
  - documentation of new covered waste in accordance with the requirements in Section VIII, *Addition of New Covered Waste*; and
  - proposed changes to the overall schedule in the CP.

### **2.0 CHANGES AND REVISIONS TO THE CP OCCURRING SINCE THE PREVIOUS ANNUAL UPDATE**

This section describes revisions, amendments, or other changes to the LANL CP.

#### **2.1 Activities Completed During FY15**

During FY15, no CP Activity milestones were scheduled.

*Table 2.1-1 FYXX FFCO and STP Milestones Compilation [Table omitted]*

#### **2.2 Expedited Shipment Letters**

There were no expedited shipment letters in FY15.

#### **2.3 Correspondence**

Between October 1, 2014 and September 30, 2015, DOE/LANS communicated with NMED on issues related to:

- FY14 and FY15 waste shipment notifications;
- 15-day notification, proposed deletion of waste;
- Revision 25.0 of the Annual STP Update; and
- Response to August 26, 2015, Notice of Disapproval.

This correspondence is listed in Appendix I (Table I-2). Correspondence previously listed in Appendix I, Table I-2 of Revision 25.0 of the STP is so noted in the appendix.

### **3.0 DESCRIPTION OF DELETED WASTE**

A proposal for deletion of STP waste items is included with this update as Proposed Revision 26.0 in accordance with FFCO Section IX, *Deletion of Waste*. These deletions are proposed because the wastes were shipped offsite for treatment, disposal, or recycling or were otherwise determined not to be mixed wastes. These covered wastes are included in Appendix B, Appendix F, and Appendix G.

### **4.0 DOCUMENTATION OF NEW COVERED WASTE**

A proposal for addition of STP waste items is included with this update in accordance with FFCO Section VIII, *Addition of Waste*. These additions consist of wastes placed in storage during FY14 and were proposed to become covered wastes in FY15. These covered wastes are included in Appendix E. Addition of new covered and newly characterized as MTRU waste to be added to the STP is identified in Section 6.1.

### **5.0 PROPOSED CHANGES TO THE COMPLIANCE PLAN SCHEDULE**

DOE/LANS is proposing to revise the milestone for Activity 4.0-2(C) to “complete transfer of Metallic Waste to CMR for material retrieval.” This milestone addresses the MTRU metallic waste inventory at TA-55. DOE/LANS expects to be able to complete transfer of the metallic wastes by November 30, 2018.

#### **I. Compliance Dates and Waste Description**

MTRU covered metallic wastes are associated with the Confinement Vessel Disposition (CVD) project. The project involves recovery of materials and wastes from confinement vessels stored at TA-55. The vessels contain important programmatic materials that can be recovered and used in current DOE National Security programs.

Current proposed compliance date: September 30, 2017.

Proposed Revision 26 compliance date: November 30, 2018.

#### **II. Recovery Process**

The CVD project is an onsite radiological decontamination project, as described in Part III (CP), Section 2.7 of this STP Update. As described therein, methods such as sand-blasting and hand-scrubbing are used to remove radiologically-contaminated materials and wastes from the interior surfaces of the confinement vessels. The project involves performing the following process steps on each vessel: 1) empty the vessel of its contents, 2) sort and segregate the programmatically-valuable material from the other material in the vessel, 3) decontaminat the vessel to low-level waste (LLW) levels if technically possible, and 4) disposition the removed waste and the emptied vessel in accordance with current radioactive and hazardous waste regulatory requirements. Programmatically-valuable material was packaged separately and supplied to a LANL research team performing national security work. Material was removed from two vessels, and a third was moved to the recovery facility for processing.

### III. Availability of Recovery Facility

The project is being executed in Wing 9 of the CMR Building at LANL. DOE/LANS notifies NMED in writing at least 15 calendars days before each vessel is transferred to the recovery facility at the CMR building for material retrieval.

### IV. Justification for Milestone

This is still a relatively new process that had never been attempted before the first vessel was processed. DOE/LANS is requesting the revised date because several challenges for meeting the project's original objective caused unexpected delays affecting the overall project schedule. The delays are as follows:

- 1) Difficulties with meeting the LLW vessel-decontamination criterion of less than 100 nancuries/gram. Some of the vessels encountered so far in this project have so much unexpected embedded material that they will require additional methods for decontamination that are not currently available at the CVD recovery facility. Additional decontamination methods are being investigated at TA-54; however, processes that would constitute physical or chemical treatment of waste would require Respondents to seek a permit before proceeding. If the LLW criterion cannot be met using the current decontamination process, a vessel may have to be size-reduced into four sections and each section will be discarded as TRU waste.
- 2) Unforeseen process deviations occurred with the first vessels being processed. Work was paused and placed in a safe configuration while the operating procedure was modified to address the deviation. In a nuclear facility such as CMR building, modifications must follow the Integrated Work Management Process, which includes management approvals and an Unreviewed Safety Questions Determination. Workers were trained to the changed procedure and the procedure was implemented in the field. For the cleanout of vessel 1, there were seven procedure changes resulting in a total of about a 14-week delay. As evidence of team learning and process improvement, vessel 2 required only three procedure changes resulting in a total of about a 4-week delay.

A change required in the CMR authorization basis due to a Potential Inadequacy in the Safety Analysis (PISA) was declared for the CVD project on February 12, 2015. The PISA was related to an undefined state for the second vessel being cleaned-out where radionuclide quantities exceeded the dose equivalent threshold value for the authorization basis at that facility. The new safety analysis took 11 months to complete, which caused the longest work delay in 2015. While the CMR authorization basis was changed, some processing activities authorized by the current documented safety analysis continued on other vessels at the facility; but any significant progress on other vessels was precluded due to the configuration of the second vessel during the pause.

No other changes to the schedule in the CP of the STP are proposed.

## 6.0 DETAILED DESCRIPTION OF THE PROPOSED REVISION

The purpose of this revision request is to reflect changes in the STP inventories in the LANL CP of the STP in accordance with FFCO Section X.C.2.a. The changes proposed by this revision to the CP 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 CP text changes are indicated in the redlined version provided to NMED.

DOE/LANS is proposing to revise the CP text to reflect the following change in STP-covered inventories:

- Increases and decreases in covered mixed waste inventories due to the addition of new covered waste and offsite shipments during FY15 and other changes in the STP inventory.

The CP 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*.

## 6.1 Addition of New Covered<sup>1</sup> Waste

DOE/LANS is requesting that the following waste be added to the STP as covered waste.

### 6.1.1 MLLW Additions

The volume of MLLW requested for addition is 0.644 m<sup>3</sup> of new-covered *10–100 nCi/g Waste* (LA-W935).

Table 6.1.1-1 Proposed Addition of New-Covered MLLW Waste

CP Section	MWIR <sup>1</sup> Waste ID	Treatability Group	Volume (m <sup>3</sup> )
3.3.4	LA-W935	10–100 nCi/g Waste	0.644 <sup>2</sup>
<b>Total</b>			<b>0.644</b>

<sup>1</sup>MWIR is Mixed Waste Inventory Report.

<sup>2</sup>Real-time radiography recharacterization of LLW.

### 6.1.2 MTRU Waste Additions

The volume of new-covered MTRU waste requested for addition is 17.096 m<sup>3</sup> (Table 6.1.2-1). DOE/LANS also requests the addition of 1.288 m<sup>3</sup> of *Combustible-Noncombustible Waste*, previously managed in the TRU inventory (Appendix G, Table G-1). Table 6.1.2-2 identifies waste that is proposed for addition following activities that identified waste in the TRU inventory as MTRU either through review of waste characteristics or as a result of identifying potentially hazardous constituents during repacking TRU waste.

Table 6.1.2-1 Proposed Addition of New Covered<sup>1</sup> MTRU Waste

CP Section	Treatability Group	Volume (m <sup>3</sup> )
4.0	Combustible-Noncombustible Waste	6.038
<b>Total TA-54 New Covered Waste</b>		<b>6.038<sup>2</sup></b>
4.0	Combustible-Noncombustible Waste at CMR	4.188
4.0	Combustible-Noncombustible Waste at TA-55	2.912
4.0	Combustible Waste at TA-55	3.126
4.0	Noncombustible Waste at TA-55	0.832
<b>Total CMR/TA-55 New Covered Waste</b>		<b>11.058<sup>3</sup></b>
<b>Total New Covered Waste</b>		<b>17.096</b>

<sup>1</sup>New-covered waste in Table 6.1.2-1 refers to waste generated in the previous FY.

<sup>1</sup> Waste generated during the previous FY that was not shipped offsite within one year is termed new-covered STP waste.

<sup>2</sup> Waste generated during the previous FY that was not shipped offsite within one year. All shipments of MTRU covered waste inventory to WIPP were suspended in May 2014 due to the WIPP shutdown.

<sup>3</sup> Due to updating its Safety Basis documents, TA-54 has temporarily stopped or significantly reduced the receipt of LANL-generated MTRU waste at TA-54.

*Table 6.1.2-2 Proposed Addition of Waste Newly Characterized as MTRU*

CP Section	Treatability Group	Volume (m <sup>3</sup> )
4.0	<i>Noncombustible Waste</i> (identification of potentially hazardous constituents based on investigation of characterization of TRU nitrate salt waste)	1.288
<i>Total Newly-Characterized MTRU</i>		<b>1.288</b>

## 6.2 Deletion of Covered Waste

MLLW and MTRU wastes were shipped offsite for treatment and disposal or recycling or are otherwise proposed as deleted waste.

### 6.2.1 Deletion of MLLW

No waste was shipped offsite for treatment and disposal or recycling. No waste is proposed for deletion due to treatment and disposal or recycling in FY15.

### 6.2.2 Deletion of MTRU Waste

No waste was shipped offsite for disposal at WIPP. No waste is proposed for deletion in 2015 due to disposal at WIPP.

### 6.2.3 Other Deletions of FY15 Waste

No waste is proposed for deletion due to recycling or onsite treatment in FY15. No waste was shipped offsite for treatability studies.

## 6.3 Adjustments to the Original (October 4, 1995) STP-Covered MLLW Inventory

DOE/LANS is requesting adjustments to the original (October 4, 1995) STP-covered MLLW inventory as listed in Appendix C (Table C-1). Most administrative adjustments are due to reclassification of MTRU waste to MLLW treatability groups and to quality control activities related to preparing waste for treatment and disposal. These adjustments may result in additions of newly-identified covered waste or transfers of waste to other treatability groups.

## 6.4 Adjustments to MTRU Waste Inventory

DOE/LANS is requesting adjustments (Appendix G, Tables G-1 and G-2) to the original (October 4, 1995) STP-covered MTRU waste inventory. Most administrative adjustments are due to reclassification of MTRU waste to MLLW treatability groups or to other MTRU treatability groups and to reclassification of TRU to MTRU as a result of quality control activities related to preparing waste for treatment and disposal. These adjustments may result in additions of newly-identified covered waste or transfers of waste to other treatability groups.

## **6.5 Establishment of New Milestone Activity Dates**

DOE/LANS is not requesting any new compliance milestones.

## **6.6 Additional Revisions**

No other revisions are requested.

## **7.0 RATIONALE FOR THE PROPOSED REVISION**

This information is provided in accordance with FFCO Section X.C.2.a.

### **7.1 Establishment of New Proposed Milestone**

No new milestones are proposed.

### **7.2 Addition of New Covered Waste**

Waste that was newly generated in FY14, which was not treated within 12 months of generation, became new covered waste during FY15 (see Appendix E). In addition, TRU wastes, re-evaluated during repacking and quality control activities as having previously unidentified RCRA constituents, were also added to the STP inventory (Appendix G). 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.

### **7.3 Deletion of Covered Waste**

There were no deletions of covered waste in FY15.

### **7.4 Adjustments to the Original (October 4, 1995) STP-Covered Waste Inventory**

Administrative adjustments result from quality control activities related to preparing waste for treatment and disposal. These adjustments result in additions of newly-identified covered waste and transfers of waste to other treatability groups. The adjustments to the original (October 4, 1995) STP-covered waste inventory are proposed to more accurately reflect the LANL STP inventory as of the end of FY15.

## **8.0 ANTICIPATED LENGTH OF ANY DELAY IN PERFORMANCE**

In accordance with FFCO Section X.C.2.c, DOE/LANS cannot confidently predict the anticipated delay in performance for shipping covered STP MTRU waste for which the only currently allowed deletion pathway is disposal at WIPP. All shipments of MTRU covered waste inventory offsite were suspended in May 2014 due to the WIPP shutdown. At this time, DOE/LANS cannot confidently predict when the TA-54 processing lines will come back online for further processing of MTRU and/or MLLW covered waste.

## **9.0 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 (FFCO Section X.C.2.d).

## **PART III COMPLIANCE PLAN – PROPOSED REVISION 26.0**

### **1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN**

#### **1.1 Introduction**

Part III of this document identifies changes that require NMED approval as a revision under Section X, *Revisions*, or an amendment under Section XI, *Other Amendments to the STP*.

The CP includes a schedule for offsite 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 New Mexico Administrative Code (NMAC) 4.1, that incorporates by reference 40 CFR Parts 260 through 270. Part I, Background, contains progress reports as required in the FFCO. Respondents shall carry out the activities described in the STP, including the CP, in accordance with the schedules and requirements set forth in the STP and the FFCO.

#### **1.2 STP Revisions and Amendments**

The STP CP 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, FFCO, as amended and revised. The history of revisions is provided in Appendix J.

### **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 timeframe 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 were identified and developed. For the waste that will be treated onsite, the categories of activities for compliance dates identified in Table 2.1.1-1 shall apply.

*Table 2.1.1-1 Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies*

A.	Submit permit applications to 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 were identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated onsite, the categories of activities for compliance dates are identified in Table 2.1.2-1 and shall apply.

*Table 2.1.2-1 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**

Offsite treatment at a commercial or noncommercial mixed waste treatment facility is the primary preferred treatment option applicable to all mixed waste streams in the STP inventory unless otherwise indicated in the descriptions of individual waste treatability groups. DOE may also pursue parallel treatment options, such as recycling/re-use or radiological decontamination. Requirements for waste shipped offsite for recycling are discussed under Part III, Section 2.6. All activities and compliance dates related to the construction, permitting, and operation of onsite treatment skids were removed from this document. This change was due to the increased availability of offsite treatment and disposal capacity for mixed waste. Respondents will continue evaluating new commercial and DOE offsite treatment facilities as potential options for managing mixed waste, as they become available.

## **2.3 Plans for Mixed Waste to be Shipped Offsite for Treatment**

Should DOE decide to treat or recycle waste at a commercial offsite facility (Table 2.3-1), 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/recycling facility.

*Table 2.3-1 Activities for Offsite Shipment 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 offsite facility for treatment or recycling within 45 working days of receipt of waste at the treatment facility.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to a noncommercial 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 offsite noncommercial 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 45 working days of receipt of waste at the treatment/recycling facility. Activities for mixed waste to be shipped offsite for treatment/recycling at a noncommercial facility are identified in Table 2.3-2.

*Table 2.3-2 Activities for Shipment Offsite for Treatment or Recycling at a Noncommercial Facility*

A.	Request necessary approval from NMED for shipment of waste by category before shipping.
B.	Meet all regulatory requirements for offsite shipment.
C.	Provide documentation to NMED of confirmation of shipment date within 14 working days prior to sending waste to an offsite 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 offsite facility for treatment within 45 working days of receipt of waste at the offsite 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.

### **2.3.1 Specific Site Requirements for Noncommercial Treatment Facilities**

#### Shipment to Idaho National Laboratory

Prior to shipment, Idaho National Laboratory (INL) and Idaho Division of Environmental Quality shall be notified of any pending shipments of waste should DOE ship MLLW to INL. 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 residues to LANL. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within 30 working days after receipt of shipment of treatment residuals or newly-generated waste streams from INL.

Shipments of MLLW to planned facilities (not yet existing) will occur only after treatment and schedules are approved by the DOE Idaho Field Office 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

If Oak Ridge Reservation may not dispose of mixed-waste residues or new waste streams generated from offsite 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 30 working days after receipt of shipment of treatment residuals or newly-generated waste streams from the Oak Ridge Reservation.

## 2.4 Requirements Pertaining to Radionuclide Separation

The FFCA sets additional requirements in cases where DOE intends to conduct radionuclide separation of mixed waste. Should DOE determine to do radionuclide separation of such mixed waste, DOE will schedule specific compliance dates based on category activities identified in Table 2.4-1. “Radionuclide separation” shall mean segregating the radioactive portion of the mixed waste from the hazardous portion of the mixed waste.

Table 2.4-1 Activities for Radionuclide Separation

- |    |   |
|----|---|
| 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 an NMED permit application.   |

## 2.5 Plans Related to Other Mixed Waste Activities

Activities other than the types of activities specifically called for in the FFCA as requiring schedules are described in this STP. Some of these activities may be associated with schedules that may contain compliance dates related to treatment of DOE’s mixed waste.

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 FFCO. 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 FFCO.

DOE will notify NMED when offsite 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 offsite 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 onsite or offsite 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 offsite for treatment. Any and all requirements by the recycling facility and all state, federal, 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 offsite noncommercial 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 offsite noncommercial 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 45 working days of receipt of waste at the recycling facility. Activities for mixed waste to be recycled are identified in Table 2.6-1.

*Table 2.6-1 Requirements for Recycling*

- |   |
|---|
| <ul style="list-style-type: none"><li>A. Meet all regulatory requirements for recycling/re-use.</li><li>B. Provide documentation to NMED that waste has been received within 45 working days of receipt of waste at the recycling facility.</li></ul> |
|---|

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 offsite for treatment. DOE will submit a notification letter to NMED within 45 days, in place of documentation, that waste was received at a recycling facility.

## **2.7 Onsite Radiological Decontamination**

DOE will pursue onsite 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 CP 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 2.7-1.

*Table 2.7-1 Activities for Radiological Decontamination*

- |  |
|--|
| <ul style="list-style-type: none"><li>A. Meet all DOE requirements for radiological decontamination.</li><li>B. Provide documentation to NMED that waste has been received within 45 working days of receipt of waste at the recycling facility; or</li><li>C. Propose waste for deletion in accordance with Section IX of the FFCO.</li></ul> |
|--|

## **3.0 MIXED LOW-LEVEL WASTE STREAMS**

This section presents the preferred options to treat MLLW at LANL. All preferred options not described below must be approved by NMED in accordance with the revision process pursuant to the FFCO.

The original October 4, 1995, STP inventory in each MLLW treatability group was modified through the revision process in the FFCO. The tables in the STP Background (Part I) Appendices A–M of the FY09 STP Annual Update provide a comprehensive summary of changes to the CP covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of that revision. In Part III, 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 subsections of this section, 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 were assigned Activities and Compliance Dates unique to that subgroup, those subgroups are detailed in the text. Activities and Compliance Dates that were met in previous years are not shown in this document.

### 3.1 Mixed Waste Streams

The following subsections summarize MLLW treatability groups.

#### 3.1.1 IPA Wastes and Scintillation Fluids

Table 3.1.1-1 Treatability Groups for IPA Wastes and Scintillation Fluids

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
IPA Wastes	LA-W901	D001, D009, F002, F003, F005	0.00
Scintillation Fluids	LA-W902	D001, F003, F005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** The waste will be treated at an offsite facility that combusts organic liquid waste.

#### 3.1.2 Lead Blankets, Soil with Heavy Metals, Environmental Restoration (ER) Soils

Table 3.1.2-1 Treatability Groups for Lead Blankets, Soil with Heavy Metals, ER Soils

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** The waste will be treated at an offsite facility that stabilizes or macroencapsulates wastes.

#### 3.1.3 Aqueous Organic Liquids

Table 3.1.3-1 Treatability Groups for Aqueous Organic Liquids

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Table 3.1.3-2 Additional Treatability Groups for Aqueous Organic Liquids**

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
<i>Aqueous Organic Liquids</i>	LA-W906-6 LA-W906-9 LA-W906-10 LA-W906-15	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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**3.1.4 Organic-Contaminated Combustible Solids**

**Table 3.1.4-1 Treatability Groups for Organic-Contaminated Combustible Solids**

Treatability Group	MWIR* Waste ID	RCRA codes	Net Volume (m <sup>3</sup> )
<i>Organic-Contaminated Combustible Solids</i>	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Table 3.1.4-2 Treatability Groups for Organic-Contaminated Noncombustible Solids**

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
<i>Organic-Contaminated Noncombustible Solids</i>	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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

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

**Table 3.1.5-1 Treatability Groups for Combustible Lead, Activated or Inseparable Lead, and Noncombustible Debris**

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
<i>Combustible Debris</i>	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	0.00
<i>Activated Or Inseparable Lead</i>	LA-W921	D008	0.00
<i>Noncombustible Debris</i>	LA-W922 LA-W922-17 LA-W922-22 LA-W922-23 LA-W922-24 LA-W922-25	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

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

Table 3.1.6-1 Treatability Groups for Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.7 Water-Reactive Metal

Table 3.1.7-1 Treatability Groups for Water-Reactive Metal

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Water-Reactive Metal	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.8 Compressed Gases Requiring Scrubbing

Table 3.1.8-1 Treatability Groups for Compressed Gases Requiring Scrubbing

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Compressed Gases Requiring Scrubbing	LA-W917 LA-W917-21 LA-W917-24 LA-W917-25 LA-W917-26	D001, D002, D003, D008, D009, P056	1.248
<b>Totals</b>			<b>1.248</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.1.8-2 Activities and Compliance Dates for Compressed Gases Requiring Scrubbing

Activity	Compliance Dates
A. Complete shipping of existing wastes to an offsite treatment facility or complete parallel option.	September 30, 2018
B. Provide documentation to NMED that waste was received at offsite 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

Table 3.1.9-1 Treatability Groups for Compressed Gases Requiring Oxidation

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Compressed Gases Requiring Oxidation	LA-W918	D001, U226	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.10 Elemental Mercury

Table 3.1.10-1 Treatability Groups for Elemental Mercury

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Elemental Mercury	LA-W920 LA-W920-16	D006, D009, F005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.11 Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, Polychlorinated Biphenyl (PCB) Wastes with RCRA Components, Liquid and Solid Oxidizers

Table 3.1.11-1 Treatability Groups for Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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	0.00
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	0.00
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	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.1.11-2 Additional Treatability Groups

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Liquid And Solid Oxidizers	LA-W923	D001, D003, D005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

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

Table 3.2-1 Treatability Groups for Waste Requiring Characterization or Assessment

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Lead Wastes – to be determined (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		0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.2-2 Additional Wastes Requiring Characterization or Assessment

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Lead Wastes - TBD	LA-W924-15	D003, D008	0.00
	LA-W924-16		0.00
	LA-W924-17		0.00
Mercury Wastes – TBD	LA-W925-4	D003, D007, D008, D009 F001, F002, F005	0.00
	LA-W925-5		
	LA-W925-6		
	LA-W925-15		
	LA-W925-16		
	LA-W925-17		
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	0.00
	LA-W933-17		
High Activity Waste	LA-W934	D001, D003, D008, D009	1.301
	LA-W934-16		
	LA-W934-19		
	LA-W934-20		
	LA-W934-24		
<b>Totals</b>			<b>1.301</b>

\*MWIR is Mixed Waste Inventory Report

**Table 3.2-3 Activities and Compliance Dates for Wastes Requiring Characterization or Assessment**

Activity	Compliance Dates
A. Complete shipping of wastes to an offsite treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option.	June 30, 2018
B. Provide documentation to NMED that waste was received at offsite facility or provide notification of parallel option.	Within 45 days of receipt of waste at offsite facility or within 45 days after completion of parallel option.

LANL’s inventory of *High Activity Waste* consists of five containers with a combined volume of 1.301 m<sup>3</sup>. Assuming that shipping issues can be resolved, LANL expects to meet the June 30, 2018, milestone for the remaining *High Activity Waste*.

DOE/LANS continues to diligently pursue all possible options to ship the waste offsite prior to the milestone for the remaining five containers (tritium traps with mercury contamination and the mole sieves and squib assemblies with very high tritium). The contract DOE/LANS has in place with Perma-Fix will allow for LANL to ship the High Activity Waste offsite for treatment and disposal. Perma-Fix has completed the characterization (evaluation including calculations and certification statement identifying all hazardous and radioactive characteristics of the waste), the transportation plan that addresses all aspects of the Department of Transportation requirements to compliantly package and ship the waste, and the Nuclear Regulatory Commission permit with the State of Tennessee for a tritium project-specific license required to handle the curie content in the High Activity Waste. Perma-Fix is in the process of preparing Certificate of Compliance modifications for the selected 10-160B cask for transport to the commercial treatment facility. The Type B Cask (TRU PAC II) became unavailable for use so the 10-160B cask is being pursued as the shipping method for this high activity waste.

### 3.3 Plans for Other Types of Activities

The following subsection summarizes plans for other types of activities.

#### 3.3.1 Lead Decontamination

**Table 3.3.1-1 Treatability Groups for Lead Decontamination**

Treatability Group	MWIR* Waste ID	First Category	Second Category	Totals
		Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )
<i>Lead For Surface Decontamination</i>	LA-W930-0 LA-W930-5	0.00	0.00	0.00
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** Any lead not acceptable for onsite or offsite lead decontamination, and any lead unsuccessfully decontaminated, will be designated in the following two categories: 1) for treatment and disposal at an offsite facility or 2) for recycle through an offsite 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.

Table 3.3.1-2 Additional Wastes for Lead Decontamination

Treatability Group	MWIR* Waste ID	First Category	Second Category	Totals
		Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )
Lead For Surface Decontamination	LA-W930-6	0.00	0.00	0.00
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.3.2 Sorting, Surveying, and Decontamination

Table 3.3.2-1 Treatability Groups for Sorting, Surveying, and Decontamination

Treatability Group	MWIR* Waste ID	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>		<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.3.2-2 Additional Wastes for Sorting, Surveying, and Decontamination

Treatability Group	MWIR* Waste ID	Net Volume (m <sup>3</sup> )
Nonradioactive or Suspect Waste Items	LA-W929-5	0.00
<b>Totals</b>		<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.3.3 Lead Requiring Sorting

Table 3.3.3-1 Treatability Groups for Lead Requiring Sorting

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m3)
Lead Requiring Sorting	LA-W931	D008	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** Wastes in this treatability group 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 were packaged in the same drum.

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

### 3.3.4 10–100 nCi/g Waste

Table 3.3.4-1 Treatability Groups for 10–100 nCi/g Waste

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
10–100 nCi/g	LA-W935 LA-W935-19 LA-W935-20 LA-W935-21 LA-W935-22 LA-W935-23 LA-W935-24 LA-W935-25 LA-W935-26	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	<b>33.140</b>
<b>Totals</b>			<b>33.140</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** Wastes in this treatability group consist of a population of legacy drums packaged and managed as MTRU (>100 nCi/g) but, after assay, were determined to be MLLW (<100 nCi/g). 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 low-level waste population, and drums are relabeled appropriately. The drum is reclassified from TRU to MLLW in the database.

The MLLW drums are prepared for treatment and disposal to an offsite facility using CCP-Acceptable Knowledge documentation.

Table 3.3.4-2 Activities and Compliance Dates for 10–100 nCi/g Waste

Activity	Compliance Dates
A. Complete radiological characterization.	September 1, 2018
B. Complete shipment of existing waste to offsite facility for treatment, or complete parallel options.	September 30, 2018
C. Provide documentation to NMED that waste was received at offsite 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.

The estimated waste volumes will be subtracted from the MTRU STP inventory and added to the MLLW STP inventory as the waste is reclassified as MLLW. However, because of the repacking process, the apparent volume of waste will reflect the number of additional containers needed to repack the waste into compliant configurations for transportation and disposal. The ongoing repackaging process for waste to be accepted at offsite treatment and disposal facilities will continue to produce 10–100 nCi/g Waste (LA-W935); therefore, DOE/LANS will seek updates to milestone(s) annually.

### 3.4 Management of “Missing” Items

Table 3.4-1 Waste Category for “Missing Waste”

Category	MWIR* Waste ID	Net Volume (m <sup>3</sup> )
Missing/Nonexistent/To be verified (TBV)	None	0.00
<b>Totals</b>		<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**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 expected containers, according to the LANL data files for the waste item. In some instances, such items cannot be verified as having been received in storage at LANL, and follow-up investigations of the record files reveal that although they were included in the original STP inventory, the waste items were never generated.

Some waste items were determined not to exist after visual inspection and document review. When DOE/LANS determines 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 verified the absence of all “Missing/nonexistent/TBV” items container by container as each STP waste item was being sampled, repackaged, or otherwise prepared for onsite or offsite treatment. The final verification of all “Missing/nonexistent/TBV” items was completed by 2004. All missing or nonexistent items were deleted from the STP. All remaining MLLW items in the original STP inventory were treated and disposed of.

If, at any time, any of these items is discovered in the inventory, NMED would be notified and approval requested for assignment of the rediscovered items to the appropriate treatability group. If necessary, they would be assigned new Activities and Compliance Dates in accordance with the terms of the FFCO.

### 4.0 MIXED TRANSURANIC WASTE

**Treatment Group(s):** Assorted MTRU Waste

**Offsite Disposal:** MTRU waste at LANL will be shipped for disposal at WIPP, located in Carlsbad, New Mexico.

**Disposal:** Waste volumes listed in Table 4.0-1 constitute the remaining original population of the Framework Agreement of “non-cemented above-ground EM Legacy TRU” and “above-ground cemented EM Legacy TRU” that is MTRU waste only. Volume adjustments noted below are due to corrections of database entries, treatability group, EPA codes, overpacks removed/added, containers repacked and shipped/hold for waste items identified as the non-cemented and cemented above-ground EM Legacy TRU for MTRU STP waste.

*Table 4.0-1 Treatability Groups for The Framework Agreement MTRU Waste (remaining original containers)*

Treatability Group	CP Section	FY14 Shipped (on hold) <sup>1</sup>	FY14 Volume (m <sup>3</sup> )	FY15 Administrative Adjustments	FY15 Volume (m <sup>3</sup> )
<i>Cemented Sludge</i>	4.0	0.000	0.000	0.000	0.000
<i>Combustible – Noncombustible Waste</i>	4.0	30.736	21.298	11.640	63.674
<i>Combustible Waste</i>	4.0	0.000	0.208	0.000	0.208
<i>Metallic Waste</i>	4.0	0.208	0.000	0.000	0.208
<i>Noncombustible Waste</i>	4.0	1.040	0.208	0.000	1.248
<i>Solidified Inorganic and Organic Waste</i>	4.0	9.588	10.312	0.000	19.900
<b>Totals</b>		<b>73.598<sup>2</sup></b>		<b>85.238</b>	

<sup>1</sup>This waste was shipped offsite to WIPP or a WCS facility but has not yet been disposed. Therefore, the volume is not to be subtracted from the STP inventory. Removal of waste from the STP inventory is on hold until NMED approval is received.

<sup>2</sup>Total volume is the sum of both columns: FY14 Shipped (on hold) and FY14 Volumes.

*Table 4.0-2 Activities and Compliance Dates for MTRU Inventory at TA-55 and CMR from Table E-2*

Activity	Compliance Dates
A. Complete transfer of existing waste (excluding Metallic Waste) to TA-54 facility	September 30, 2017
C. Complete transfer of Metallic Waste to CMR for material retrieval	November 30, 2018

**Transfer of Covered MTRU Inventory:** The FY15 reported waste volume for STP-covered MTRU inventory at TA-55 and CMR is 45.844 m<sup>3</sup>. In FY15, approximately 22 m<sup>3</sup> of the 36 m<sup>3</sup> of STP waste at TA-55 is associated with the CVD Project (formerly referred to as the Bolas Grande Project), that started in the summer of FY14. A milestone extension request to November 30, 2018, is proposed as discussed in the CP Update Part II, Section 5.0. The remainder of the covered MTRU waste inventory at TA-55 consists of radioactive-free liquids, requiring management at the Waste Characterization, Reduction, and Repacking Facility (WCRRF). WCRRF is currently not receiving waste until it has implemented corrective actions as directed by the DOE’s Accident Investigation Board, including updating its Safety Basis documents. TA-54 is updating its Safety Basis documents that govern Material at Risk and it’s Composite Source Term Limits (amount of combustible waste that can be stored at TA-54). This updating process has temporarily stopped or significantly reduced the receipt of LANL-generated TRU and MTRU waste at TA-54. Therefore, newly-generated MTRU waste is primarily being stored at TA-55 until the TA-63 TRU Waste Facility becomes operational.

#### 4.1 Management of “Missing” Items

Table 4.1-2 Waste Category for “Missing Waste”

Category	Treatability Groups	Net Volume (m <sup>3</sup> )
<i>Missing/Nonexistent/TBV</i>	<i>Cemented Sludge</i>	0.00
	<i>Combustible-Noncombustible Waste</i>	0.000
	<i>Combustible Waste</i>	0.000
<b>Totals</b>		<b>0.000</b>

**Treatment:** During visual inspections in support of STP waste work-off, occasionally an item cannot be found, or it is not located in the expected containers, according to the LANL data files for the waste item. In some instances, such items cannot be verified as having been received in storage at LANL, and follow-up investigations of the record files reveal that although the items were included in the original STP inventory, the waste items were never generated.

Some items were determined not to exist after visual inspection and document review. When LANS determines that an STP-covered waste item does not exist, transfer of the item to the category called “*Missing/nonexistent/TBV*” is requested through this revision Annual Update.

If, at any time, any of these items is discovered in the inventory, NMED would be notified and approval requested for assignment of the rediscovered items to the appropriate treatability group.

Table 4.1-2 Waste Category for “Missing Waste” – Detail [Table Omitted]

# **APPENDICES**

**APPENDIX A CURRENT YEAR MLLW INVENTORY DETAIL**

*Table A-1 FY15 MLLW Inventory Detailed Update by Treatability Group*

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.1.1	LA-W901 <i>IPA Wastes</i>	0	0		0	0
3.1.1	LA-W902 <i>Scintillation Fluids</i>	0	0		0	0
3.1.2	LA-W903 <i>Lead Blankets</i>	0	0		0	0
3.1.2	LA-W904 <i>Soil with Heavy Metals</i>	0	0		0	0
3.1.2	LA-W905 <i>ER Soils</i>	0	0		0	0
3.1.3	LA-W906 <i>Aqueous Organic Liquids</i>	0	0		0	0
3.1.4	LA-W911 <i>Organic-Contaminated Combustible Solids</i>	0	0		0	0
3.1.4	LA-W919 <i>Organic-Contaminated Noncombustible Solids</i>	0	0		0	0
3.1.5	LA-W912 <i>Combustible Debris</i>	0	0		0	0
3.1.5	LA-W921 <i>Activated or Inseparable Lead</i>	0	0		0	0
3.1.5	LA-W922 <i>Noncombustible Debris</i>	0	0	Administrative Adjustment	0	0
			0	Shipped offsite for treatment/disposal		
3.1.6	LA-W913 <i>Aqueous Wastes with Heavy Metals</i>	0	0		0	0
3.1.6	LA-W914 <i>Corrosive Solutions</i>	0	0		0	0
3.1.6	LA-W915 <i>Aqueous Cyanides, Nitrates, Chromates, and Arsenates</i>	0	0		0	0
3.1.7	LA-W916 <i>Water-Reactive Wastes</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.1.8	LA-W917 <sup>4</sup> <i>Compressed Gases Requiring Scrubbing</i>	0.833	0.415	Administrative Adjustment	1.248	0
			0	Shipped offsite for treatment/disposal		
3.1.9	LA-W918 <i>Compressed Gases Requiring Oxidation</i>	0	0		0	0
3.1.10	LA-W920 <i>Elemental Mercury</i>	0	0		0	0
3.1.11	LA-W907 <i>Halogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W909 <i>Bulk Oils</i>	0	0		0	0
3.1.11	LA-W910 <i>PCB Wastes with RCRA Components</i>	0	0		0	0
3.1.11	LA-W923 <i>Liquid and Solid Oxidizers</i>	0	0		0	0
3.2	LA-W924 <i>Lead Wastes – TBD</i>	0	0		0	0
3.2	LA-W925 <i>Mercury Wastes – TBD</i>	0	0		0	0
3.2	LA-W926 <i>Compressed Gases – TBD</i>	0	0		0	0
3.2	LA-W927 <i>Biochemical Laboratory Wastes</i>	0	0		0	0
3.2	LA-W928 <i>Dewatered Treatment Sludge</i>	0	0		0	0
3.2	LA-W932 <i>Explosives</i>	0	0		0	0
3.2	LA-W933 <i>Labpacks</i>	0	0		0	0
3.2	LA-W934 <i>High Activity Waste</i>	1.301	0	Shipped offsite for treatment/disposal	1.301	0
			0	Administrative Adjustment		
3.3.1	LA-W930 <i>Lead for Surface Decontamination</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.3.2	LA-W929 <i>Nonradioactive or Suspect Waste Items to be Surveyed</i>	0	0		0	0
3.3.3	LA-W931 <i>Lead Requiring Sorting</i>	0	0		0	0
3.3.4	LA-W935 <i>10–100 nCi/g Waste</i>	11.545	20.951	Administrative Adjustment	33.140	50
			0.644	New covered		
			0	Shipped offsite for treatment/disposal		
3.4	<i>Missing/ nonexistent/ TBV category</i>	0	0		0	N/A
<b>TOTALS</b>		<b>13.679</b>			<b>35.689</b>	

<sup>1</sup> CP is Compliance Plan; MWIR is Mixed Waste Inventory Report.

<sup>2</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>.

<sup>3</sup> Shipment details are in Appendix B; Administrative adjustments are in Appendix C.

<sup>4</sup> Items prohibited from shipment to WIPP are removed from MTRU STP containers and consolidated; some are MLLW and are included in Table A-1 as LA-W917 waste; others are MTRU waste and are considered *Combustible-Noncombustible Waste* in Table E-1.

**APPENDIX B CURRENT YEAR MLLW SHIPMENT DETAIL**

*Table B-1 MLLW Shipped Offsite for Treatment and Disposal in FY15<sup>1</sup>*

CP Section	MWIR* No.	Treatability Group	Manifest Number	Destination	Date Shipped	Date NMED Notified	Volume (m <sup>3</sup> )
3.1.8	LA-W917	<i>Compressed Gases Requiring Scrubbing Waste</i>					
<b>LA-W917 Total</b>							<b>0</b>
3.1.5	LA-W922	<i>Noncombustible Debris</i>					
<b>LA-W922 Total</b>							<b>0</b>
3.3.4	LA-W935	<i>10–100 nCi/g Waste</i>					
<b>LA-W935 Total</b>							<b>0</b>
<b>Grand Total</b>							<b>0</b>

\*MWIR is Mixed Waste Inventory Report.

<sup>1</sup>DOE/LANS have not shipped MLLW STP covered waste during FY15.

**APPENDIX C CURRENT YEAR MLLW ADMINISTRATIVE ADJUSTMENTS**

*Table C-1 Administrative Adjustments*

<b>CP Section</b>	<b>MWIR* Number</b>	<b>Administrative Adjustment</b>	<b>Volume (m<sup>3</sup>)</b>
3.3.4	LA-W935	Transferred from LA-W935 to LA-W917 as a result of treatability group reassignment	-0.208
		Removed as a result of reconciliation of inconsistencies in the current inventory	-2.549
		Added into LA-W935 from (real-time radiography) recharacterization process	19.414
		Transferred into LA-W935 from reclassification of MTRU waste	4.294
<b>Total Net Adjustments for LA-W935</b>			<b>20.951</b>
3.1.8	LA-W917	Transferred from LA-W935 to LA-W917 as a result of treatability group reassignment	0.208
		Volume changes due to addition or removal of packaging MLLW waste	0.207
<b>Total Net Adjustments for LA-W917</b>			<b>0.415</b>
<b>Total Net Adjustments</b>			<b>21.366</b>

\*MWIR is Mixed Waste Inventory Report

Table C-2 Administrative Adjustment – Detail

CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
3.3.4	LA-W935	10–100 nCi/g	Reassigned treatability group	-0.208			Transferred into LA-W917 for prohibited items
					W819835	-0.208	
		10–100 nCi/g	Removed as a result of reconciliation of inconsistencies in the current inventory	-2.549			Removed as a result of reconciliation wall-to-wall inventory and database inventory
					W729563	-2.549	
		10–100 nCi/g	Reclassified/Repack aged MTRU STP and TRU inventory to MLLW STP inventory	19.414			Transferred into LA-W935 as a result of real-time radiography recharacterization process from TRU inventory
					W788184	0.322	
					W788255	0.322	
					W777004	0.322	
					W788228	0.322	
					W788533	0.322	
					W788584	0.322	
					W788907	0.322	
					W788939	0.322	
					W789169	0.322	
					W789458	0.322	
					W790811	0.322	
					W790872	0.322	
					W790905	0.322	
					W790908	0.322	
					W791681	0.322	
					W801418	0.322	
					W801477	0.322	
					W801478	0.322	
					W801504	0.322	
					W801522	0.322	
					W801540	0.322	
					W802047	0.322	
					W802087	0.322	
					W802120	0.322	
					W91592	0.322	
			W91817	0.322			
			W91884	0.322			
			W92518	0.322			
			W92527	0.322			
			W92537	0.322			

CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W92539	0.322	
					W92714	0.322	
					W92757	0.322	
					W92772	0.322	
					W92808	0.322	
					W93039	0.322	
					W93070	0.322	
					W93321	0.322	
					W93514	0.322	
					W93522	0.322	
					W93744	0.322	
					W93768	0.322	
					W93813	0.322	
					W93818	0.322	
					W93922	0.322	
					W93961	0.322	
					W94102	0.322	
					W94105	0.322	
					W798033	0.322	
					W798112	0.322	
					W798153	0.322	
					W798642	0.322	
					W799173	0.208	
					W799253	0.208	
					W802185	0.322	
					W802487	0.322	
					W802517	0.322	
					W816860	0.322	
					W816887	0.322	
					W819936	0.322	
					W91480	0.322	
		10–100 nCi/g	Reclassified/Repack aged MTRU STP and TRU inventory to MLLW STP inventory	1.872			Less than 100 nCi/g; derived from combustible-noncombustible MTRU inventory
					W87386	0.208	Parent MTRU Container 87386, 0.208 m <sup>3</sup>
					W88664	0.208	Parent MTRU Container 88664, 0.208 m <sup>3</sup>
					W85506	0.208	Parent MTRU Container 85506, 0.208 m <sup>3</sup>
					W88610	0.208	Parent MTRU Container 88610, 0.208 m <sup>3</sup>

CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W88939	0.208	Parent MTRU Container 88939, 0.208 m <sup>3</sup>
					W88959	0.208	Parent MTRU Container 88959, 0.208 m <sup>3</sup>
					W816064	0.208	Parent MTRU Container S816064, 0.208 m <sup>3</sup>
					W846515	0.208	Parent MTRU Container S846515, 0.208 m <sup>3</sup>
3.3.4	LA-W935				W850048	0.208	Parent MTRU Container S850048, 0.208 m <sup>3</sup>
				2.422			Less than 100 nCi/g; derived from Solidified Inorganic and Organic MTRU inventory
					W834290	0.322	Parent MTRU Container S834290, 0.322 m <sup>3</sup>
					W841376	0.208	Parent MTRU Container S841376, 0.208 m <sup>3</sup>
					W841467	0.208	Parent MTRU Container S841467, 0.208 m <sup>3</sup>
					W850026	0.208	Parent MTRU Container S850026, 0.208 m <sup>3</sup>
					W850576	0.208	Parent MTRU Container S850576, 0.208 m <sup>3</sup>
					W860218	0.208	Parent MTRU Container S860218, 0.208 m <sup>3</sup>
					W880983	0.208	Parent MTRU Container S880983, 0.208 m <sup>3</sup>
					W881006	0.322	Parent MTRU Container S881006, 0.322 m <sup>3</sup>
					W881011	0.208	Parent MTRU Container S881011, 0.208 m <sup>3</sup>
					W893323	0.322	Parent MTRU Container S893323, 0.322 m <sup>3</sup>
3.1.8	LA-W917	Compressed Gases Requiring Scrubbing Waste	Reassigned treatability group	0.208			Transferred into LA-W917 from LA-W935 for prohibited items
					W819835	0.208	
			Repackaged MLLW STP inventory	0.207			
3.1.8	LA-W917				W728258	0.207	
<b>Subtotal MLLW Volume</b>						<b>21.366</b>	

\*MWIR is Mixed Waste Inventory Report

**APPENDIX D PREVIOUS YEAR MLLW INVENTORY DETAIL**

Table D-1 FY14 MLLW Inventory Detailed Update by Treatability Group

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.1.1	LA-W901 <i>IPA Wastes</i>	0	0		0	0
3.1.1	LA-W902 <i>Scintillation Fluids</i>	0	0		0	0
3.1.2	LA-W903 <i>Lead Blankets</i>	0	0		0	0
3.1.2	LA-W904 <i>Soil with Heavy Metals</i>	0	0		0	0
3.1.2	LA-W905 <i>ER Soils</i>	0	0		0	0
3.1.3	LA-W906 <i>Aqueous Organic Liquids</i>	0	0		0	0
3.1.4	LA-W911 <i>Organic-Contaminated Combustible Solids</i>	0	0		0	0
3.1.4	LA-W919 <i>Organic-Contaminated Noncombustible Solids</i>	0	0		0	0
3.1.5	LA-W912 <i>Combustible Debris</i>	0	0		0	0
3.1.5	LA-W921 <i>Activated or Inseparable Lead</i>	0	0		0	0
3.1.5	LA-W922 <i>Noncombustible Debris</i>	0.624	29.375	Administrative Adjustment	0	0
			-29.999	Shipped offsite for treatment/disposal		
3.1.6	LA-W913 <i>Aqueous Wastes with Heavy Metals</i>	0	0		0	0
3.1.6	LA-W914 <i>Corrosive Solutions</i>	0	0		0	0
3.1.6	LA-W915 <i>Aqueous Cyanides, Nitrates, Chromates, and Arsenates</i>	0	0		0	0
3.1.7	LA-W916 <i>Water-Reactive Wastes</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.1.8	LA-W917 <sup>4</sup> <i>Compressed Gases Requiring Scrubbing</i>	1.456	0.624	Administrative Adjustment	0.833	0
			1.249	Administrative Adjustment		
			-1.872	Shipped offsite for treatment/disposal		
3.1.9	LA-W918 <i>Compressed Gases Requiring Oxidation</i>	0	0		0	0
3.1.10	LA-W920 <i>Elemental Mercury</i>	0	0		0	0
3.1.11	LA-W907 <i>Halogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W909 <i>Bulk Oils</i>	0	0		0	0
3.1.11	LA-W910 <i>PCB Wastes with RCRA Components</i>	0	0		0	0
3.1.11	LA-W923 <i>Liquid and Solid Oxidizers</i>	0	0		0	0
3.2	LA-W924 <i>Lead Wastes – TBD</i>	0	0		0	0
3.2	LA-W925 <i>Mercury Wastes – TBD</i>	0	0		0	0
3.2	LA-W926 <i>Compressed Gases – TBD</i>	0	0		0	0
3.2	LA-W927 <i>Biochemical Laboratory Wastes</i>	0	0		0	0
3.2	LA-W928 <i>Dewatered Treatment Sludge</i>	0	0		0	0
3.2	LA-W932 <i>Explosives</i>	0	0		0	0
3.2	LA-W933 <i>Labpacks</i>	0	0		0	0
3.2	LA-W934 <i>High Activity Waste</i>	1.301	0	Shipped offsite for treatment/disposal	1.301	0
			0	Administrative Adjustment		
3.3.1	LA-W930 <i>Lead for Surface Decontamination</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.3.2	LA-W929 <i>Nonradioactive or Suspect Waste Items to be Surveyed</i>	0	0		0	0
3.3.3	LA-W931 <i>Lead Requiring Sorting</i>	0	0		0	0
3.3.4	LA-W935 <i>10–100 nCi/g Waste</i>	97.000	591.305	Administrative Adjustment	11.545	50
			-676.76	Shipped offsite for treatment/disposal		
3.4	<i>Missing/ nonexistent/ TBV category</i>	0	0		0	N/A
<b>TOTALS</b>		<b>100.381</b>			<b>13.679</b>	

<sup>1</sup> CP is Compliance Plan; MWIR is Mixed Waste Inventory Report.

<sup>2</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>; however, due to FY13 changes in the way that the MTRU are process (repackaged) into several different containers and are no longer equal to those added to the MLLW inventory of LA-W935.

<sup>3</sup> Shipment details are in Appendix B; administrative adjustments are in Appendix C.

<sup>4</sup> Items prohibited from shipment to WIPP are removed from MTRU STP containers and consolidated; some are MLLW and are included in Table A-1 as LA-W917 waste; others are MTRU waste and are considered *Combustible-Noncombustible Waste* in Table E-1.

**APPENDIX E CURRENT MTRU INVENTORY DETAIL**

Table E-1 TA-54 MTRU Covered Inventory (by Treatability Group)

Treatability Group	FY14 Annual Update (m <sup>3</sup> )	Proposed Revision 26.0 (m <sup>3</sup> ) <sup>1,2</sup>	Comments <sup>3</sup>	FY15 Annual Update (m <sup>3</sup> )	Projection FY16-FY20 (m <sup>3</sup> )
<b>Cemented Sludge</b>	<b>57.876</b>				
		(0) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(0)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		0	Shipped to WIPP (placed below grade)		
		0	Administrative Adjustments		
		<b>FY15 Subtotal Cemented Sludge</b>			<b>57.876</b>
<b>Combustible – Noncombustible Waste</b>	<b>473.246</b>				
		(63.674) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		6.038	New Covered		
		(-153.204)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		0	Shipped to WIPP (placed below grade)		
		-83.718	Administrative Adjustments		
		<b>FY15 Subtotal Combustible-Noncombustible Waste</b>			<b>395.566</b>
<b>Combustible Waste</b>	<b>4.468</b>				
		(0.208) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(0)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		0	Shipped to WIPP (placed below grade)		
		0	Administrative Adjustments		
		<b>FY15 Subtotal Combustible Waste</b>			<b>4.468</b>
<b>Glass Waste</b>	<b>0</b>				
		(0) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		0	Shipped Offsite		
		0	Administrative Adjustments		
		<b>FY15 Subtotal Glass Waste</b>			<b>0</b>
<b>Leaded Glovebox Waste</b>	<b>0</b>				
		(0) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		0	Shipped Offsite		

Treatability Group	FY14 Annual Update (m <sup>3</sup> )	Proposed Revision 26.0 (m <sup>3</sup> ) <sup>1,2</sup>	Comments <sup>3</sup>	FY15 Annual Update (m <sup>3</sup> )	Projection FY16–FY20 (m <sup>3</sup> )
		0	Administrative Adjustments		
			<b>FY15 Subtotal Leaded Glovebox Waste</b>	<b>0</b>	<b>0</b>
<b>Metallic Waste</b>	<b>3.349</b>				
		(0.208) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(-0.208)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		0	Administrative Adjustments		
			<b>FY15 Subtotal Metallic Waste</b>	<b>3.349</b>	<b>0</b>
<b>Noncombustible Waste</b>	<b>34.242</b>				
		(1.248) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(-14.050)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		0	Shipped to WIPP (placed below grade)		
		1.226	Administrative Adjustments		
			<b>FY15 Subtotal Noncombustible Waste</b>	<b>35.468</b>	<b>100</b>
<b>Solidified Inorganic and Organic Waste</b>	<b>300.578</b>				
		(19.900) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(-20.196)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		0	Shipped to WIPP (placed below grade)		
		94.476	Administrative Adjustments		
			<b>FY15 Subtotal Solidified Inorganic and Organic Waste</b>	<b>395.054</b>	<b>10</b>
<b>TOTAL FY14:</b>	<b>873.759</b>		<b>Total FY15 Inventory:</b>	<b>891.781</b>	<b>210</b>

<sup>1</sup> MTRU waste volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>.

<sup>2</sup> Volumes are represented to three decimal places.

<sup>3</sup> Shipping details are found in Appendix F, and Administrative Adjustments are found in Appendix G.

<sup>4</sup> Amount already included in the MTRU STP covered inventory.

<sup>5</sup> NMED has determined that the removal of MTRU from the STP will be deferred until more information becomes available and is the final disposition of the waste currently stored at the off-site facility is determined. Amount already included in the MTRU STP covered inventory.

Table E-2 MTRU Inventory at TA-55 and CMR

Location	FY14 MTRU Inventory (m <sup>3</sup> ) <sup>1</sup>	Treatability Group	Proposed Revision 26.0 (m <sup>3</sup> )	Comments <sup>1</sup>	FY15 MTRU Inventory (m <sup>3</sup> )
CMR	5.700	Combustible-Noncombustible Waste	4.188	New Covered	
			-0.088	Administrative Adjustment	
<b>Total FY15 CMR Inventory</b>					<b>9.800</b>
TA-55	3.031	Combustible-Noncombustible Waste	2.912	New Covered	
			-0.624	Administrative Adjustment	
<b>FY15 TA-55 Combustible-Noncombustible Waste Inventory</b>					<b>5.319</b>
TA-55	0.019	Combustible Waste	3.126	New Covered	
			1.859	Administrative Adjustment	
<b>FY15 TA-55 Combustible Waste Inventory</b>					<b>5.004</b>
TA-55	28.791	Metallic Waste	-6.398	Administrative Adjustment	
<b>FY15 TA-55 Metallic Waste Inventory</b>					<b>22.393</b>
TA-55	4.608	Noncombustible Waste	0.832	New Covered	
			-2.320	Administrative Adjustment	
<b>FY15 TA-55 Noncombustible Waste Inventory</b>					<b>3.120</b>
TA-55	0.208	Solid Inorganic and Organic Waste			
<b>FY15 TA-55 Solidified Inorganic and Organic Waste Inventory</b>					<b>0.208</b>
<b>Total FY15 TA-55 Inventory</b>					<b>36.044</b>
	<b>42.357</b>	<b>Total FY15 CMR/TA-55 Inventory</b>			<b>45.844</b>

<sup>1</sup> Shipping details are found in Appendix F and Administrative Adjustments are found in Appendix G. Since all waste is shipped from TA-54, there are no shipping data for CMR/TA-55, only transfers to TA-54, which are included in the Appendix G.

## APPENDIX F FY15 MTRU WASTE SHIPMENTS TO WIPP

Table F-1 FY15 MTRU Shipments to WIPP

FY15 Quarter	Treatability Group	Existing FY15 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Removed from Inventory (placed below grade) (m <sup>3</sup> )	Total FY14 Inventory (above grade) on Hold (m <sup>3</sup> )	Total Volume Shipped (m <sup>3</sup> ) <sup>1</sup>
Q1	Q1Total	0	0	0	0	0
Q2	Q2Total	0	0	0	0	0
Q3	Q3 Total	0	0	0	0	0
Q4	Q4 Total	0	0	0	0	0
<b>Grand Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

Table F-2 FY14 MTRU Shipments to WCS<sup>2</sup>

FY14 Quarter	Treatability Group	Existing FY14 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Inventory on Hold (m <sup>3</sup> )	Total Volume Shipped (m <sup>3</sup> ) <sup>1</sup>
Q3	Combustible-Noncombustible Waste Total	120.848	0.416	121.264	121.264
	Metallic Waste Total	0.208	0	0.208	0.208
	Noncombustible Waste Total	14.050	0	14.050	13.936
	Solidified Inorganic and Organic Waste Total	20.196	0	20.196	19.968
<b>Grand Total</b>		<b>155.302</b>	<b>0.416</b>	<b>155.718</b>	<b>155.376</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

<sup>2</sup> Volumes shipped in FY14 but not removed from the STP inventory.

Table F-3 FY14 MTRU Shipments to AMWTP (INL)<sup>3</sup>

FY14 Quarter	Treatability Group	Existing FY14 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Inventory on Hold <sup>2</sup> (m <sup>3</sup> )	Total Volume Shipped (m <sup>3</sup> ) <sup>1</sup>
Q1	Combustible-Noncombustible Waste Total	5.049	0	5.049	5.049
Q2	Combustible-Noncombustible Waste Total	15.294	0	15.294	15.294
Q3	Combustible-Noncombustible Waste Total	2.549	0	2.549	2.549
<b>Grand Total</b>		<b>22.892</b>	<b>0.416</b>	<b>22.892</b>	<b>22.892</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

<sup>2</sup> LANL waste treated at INL and stored at a WCS facility as of November 2014. Original containers and volume continue to be tracked since treated containers were not created at LANL.

<sup>3</sup> Volumes shipped in FY14 but not removed from the STP inventory.

Table F-4 FY14 MTRU Shipments to WIPP<sup>2</sup>

FY14 Quarter	Treatability Group	Existing FY14 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Inventory on Hold (above grade) (m <sup>3</sup> )	Total Volume Shipped (above grade) (m <sup>3</sup> ) <sup>1</sup>
Q2	Combustible-Noncombustible Waste Total	9.048	0	9.048	8.820
<b>Grand Total</b>		<b>9.048</b>	<b>0</b>	<b>9.048</b>	<b>8.820</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

<sup>2</sup> Volumes shipped in FY14 but not removed from the STP inventory.

**APPENDIX G      CURRENT YEAR MTRU INVENTORY –  
ADMINISTRATIVE ADJUSTMENTS**

*Table G-1      FY15 MTRU Administrative Adjustments to TA-54 Inventory*

<b>Treatability Group</b>	<b>Administrative Adjustment</b>	<b>Volume (m<sup>3</sup>)</b>
<i>Cemented Sludge</i>		
	<b><i>Cemented Sludge Net Adjustment</i></b>	<b>0</b>
<i>Combustible-Noncombustible Waste</i>	Reclassified as MLLW (LA-W935)	-1.872
	Added as a result from reconciliation of inconsistencies in the current inventory	2.086
	Volume changes due to addition or removal of overpacks (85 gallon, standard waste box [SWB], or ten drum overpack)	8.256
	Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	-1.694
	STP containers from Combustible-Noncombustible Waste treatability groups were reassigned to 96.200 m <sup>3</sup> Solidified Inorganic and Organic Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also included.	-94.666
	Additional covered inventory transferred from TA-55 covered inventory	4.172
	<b><i>Combustible-Noncombustible Net Adjustment</i></b>	<b>-83.718</b>
<i>Combustible Waste</i>		
	<b><i>Combustible Waste Net Adjustment</i></b>	<b>0</b>
<i>Metallic Waste</i>		
	<b><i>Metallic Waste Net Adjustment</i></b>	<b>0</b>
<i>Noncombustible Waste</i>	Added as a result of potentially hazardous constituents identification based on investigation of characterization of TRU nitrate salts waste	1.288
	Volume changes due to addition or removal of overpacks (85 gallon, SWB, or ten drum overpack)	0.114
	Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	-0.176
	<b><i>Noncombustible Waste Net Adjustment</i></b>	<b>1.226</b>
<i>Solidified Inorganic and Organic Waste</i>	Reclassified as MLLW (LA-W935)	-2.422
	Added as a result from reconciliation of inconsistencies in the current inventory	0.208
	Volume changes due to addition or removal of overpacks (85 or 110 gallon)	0.490
	STP containers from Combustible-Noncombustible Waste treatability groups were reassigned to 96.200 m <sup>3</sup> Solidified Organic and Inorganic Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also include.	96.200
	<b><i>Solidified Inorganic and Organic Waste Net Adjustment</i></b>	<b>94.476</b>
	<b><i>Total Net TA-54 Adjustment</i></b>	<b>11.984</b>

**Table G-2** FY15 MTRU Administrative Adjustments for CMR and TA-55 Inventory

<b>Location</b>	<b>Treatability Group</b>	<b>Administrative Adjustment</b>	<b>Volume (m<sup>3</sup>)</b>
CMR	<i>Combustible-Noncombustible Waste</i>	Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	-0.088
<b><i>Net Adjustment CMR Inventory</i></b>			<b>-0.088</b>
TA-55	<i>Combustible-Noncombustible Waste</i>	Volume changes due to addition or removal of overpacks (85 or 496 gallon)	1.254
		Transferred to TA-54 and assigned to <i>Combustible-Noncombustible Waste</i> in the TA-54 inventory	-1.878
<b><i>Net Adjustment TA-55 Combustible-Noncombustible Waste</i></b>			<b>-0.624</b>
TA-55	<i>Combustible Waste</i>	Volume changes due to addition or removal of overpacks (85 or 496 gallon).	1.859
<b><i>Net Adjustment TA-55 Combustible Waste</i></b>			<b>1.859</b>
TA-55	<i>Metallic Waste</i>	Transferred to CMR for Material Retrieval	-6.398
<b><i>Net Adjustment TA-55 Metallic Waste</i></b>			<b>-6.398</b>
TA-55	<i>Noncombustible Waste</i>	Transferred to TA-54 and assigned to <i>Combustible-Noncombustible Waste</i> in the TA-54 inventory	-2.294
		Volume changes due to addition or removal of overpacks (85 or 496 gallon)	-0.004
		Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	-0.022
<b><i>Net Adjustment TA-55 Noncombustible Waste</i></b>			<b>-2.320</b>
<b><i>Net Adjustment TA-55 Inventory</i></b>			<b>-7.483</b>
<b><i>Total Net TA-55/CMR Adjustment</i></b>			<b>-7.571</b>

**Table G-3** MTRU Administrative Adjustments – TA-54 Volume Adjustments [Table omitted]

**Table G-4** MTRU Administrative Adjustments – TA-54 Containers Added [Table omitted]

## APPENDIX H MLLW TREATMENT FACILITIES

Table H-1 Commercial Facilities Contacted for Waste Treatment Capabilities

Commercial Facility	Location
Perma-Fix (including Material & Energy Corporation in Tennessee; Diversified Scientific Services, Inc. in Tennessee; and Perma-Fix North West in Washington)	Florida
Waste Control Specialists	Texas
EnergySolutions of Utah (including Bear Creek Operations in Tennessee)	Utah
Nuclear Fuel Services	Tennessee
Integrated Environmental Services	Tennessee
NSSI	Texas

## APPENDIX I CORRESPONDENCE

Table I-1 Expedited Shipment Letters [Table omitted]

Table I-2 Correspondence

Letter Date	Description	Letter Number	Revision Reference	Listed in Revision 25.0 (Appendix I)
11-12-2014	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY14 Q4	WM-DO-14-063	26	Yes
1-12-2015	15-Day Notification, Proposed Deletion of Waste	WM-DO-15-001	26	Yes
2-4-2015	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY15, Q1	WM-DO-15-002	26	Yes
3-24-2015	Corrections of Off-Site Waste Shipment Notification, FY14, Activity 3.3.4 and 3.1.5	WM-DO-15-007	26	Yes
3-24-2015	Corrections of Off-Site Waste Shipment Notifications, FY14, Activity 4.0	WM-DO-15-003	26	Yes
3-24-2015	Notice of Completion of Off-Site Waste Shipment Activity 3.1.8	WM-DO-15-006	26	Yes
3-30-2015	Submittal of FY14 Annual Update and Proposed 25.0	WM-DO-15-008	26	Yes
4-23-2015	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY15, Q2	WM-DO-15-014	25	No
7-9-2015	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY15, Q3	WM-DO-15-025	25	No
8-13-2015	15-Day Notification, Proposed Deletion of Waste	WM-DO-15-028	25	No
9-24-2015	Response to the August 26, 2015, Notice of Disapproval of the Los Alamos National Laboratory's Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 2014 Revision 25.0	WM-DO-15-032	25	No

## APPENDIX J HISTORY OF CHANGES TO THE CP AND FFCO

As discussed in Part III (CP), Section 1.2, the STP CP 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, FFCO, as amended and revised. This appendix provides a summary of these CP changes and of modifications to the FFCO since its issuance.

To date, there have been 25 revisions and three amendments to the CP. In addition, the FFCO was amended once on May 20, 1997. Table J-1 provides a summary of these changes. More detailed descriptions can be found in the CP Update portion of each year’s STP *Annual Update* and the original correspondence requesting each change.

Table J-1 Summary of Changes to the CP and the FFCO

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CP	6/12/96	Added offsite treatment as a parallel preferred option for most MLLW treatability groups.
Rev. 2.0	STP/CP	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW.
Amendment 1.0	STP/CP	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates.
Rev. 3.0	STP/CP	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/CP	9/4/97	Extended CP Activity 3.1.2B Compliance Date to 12/29/97.
Rev. 4.0	STP/CP	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/CP	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 CP Appendices, and deleted treated items.
Rev. 6.0	STP/CP	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/CP	11/30/98	Removed onsite treatment skids, added STP inventory items, added onsite recycling/re-use and radiological decontamination, added notification for offsite treatability studies.
Rev. 8.0	STP/CP	12/3/98	Extended compliance dates for treatment of MTRU waste.
Rev. 9.0	STP/CP	6/7/00	Added and deleted volumes reported in FY98 <i>Annual Update</i> to certain treatability groups.
Amendment 3.0	STP/CP	8/30/99	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.
Rev. 10.0	STP/CP	12/18/00	Added and deleted volumes reported in FY99 <i>Annual Update</i> to certain treatability groups.
Rev. 11.0	STP/CP	4/18/01	Added and deleted volumes reported in FY00 <i>Annual Update</i> .

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 12.0	STP/CP	3/13/02	Added and deleted volumes reported in FY01 <i>Annual Update</i> . Extended CP Activity 3.1.5A Compliance Date to 8/25/03. Extended CP Activity 3.1.11A to 2/01/04. Removed the requirement to develop treatment technologies and the associated compliance schedule in CP Activity 4.0 and added language specifying that MTRU waste would be shipped offsite to WIPP for disposal.
Rev 13.0	STP/CP	7/14/03	Added and deleted volumes reported in FY02 <i>Annual Update</i> .
Rev 14.0	STP/CP	1/5/05	Added and deleted volumes reported in FY03 <i>Annual Update</i> .
Rev 15.0	STP/CP	8/16/05	Added and deleted volumes reported in FY04 <i>Annual Update</i> .
Rev 16.0	STP/CP	12/12/06	Added and deleted volumes reported in FY05 <i>Annual Update</i> . Extended CP Activity 3.1.8(A) Compliance Date to 8/09/07. Extended CP Activity 3.1.9(A) Compliance Date to 8/09/07. Extended CP Activity 3.1.10(A) Compliance Date to 8/31/07. Extended CP Activity 3.1.11(A) Compliance Date to 12/31/07. Extended CP Activity 3.2(J) Compliance Date to 12/31/07. Reclassified 0.2082 m <sup>3</sup> of LA-W934 High Activity MLLW waste to MTRU waste.
Rev 17.0	STP/CP	6/26/08	Added and deleted volumes reported in FY06 <i>Annual Update</i> . Extended CP 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 CP Activity 3.1.9(A) Compliance Date to 8/28/08. Extended CP Activity 3.2(J) Compliance Date to 12/31/08.
Rev 18.0	STP/CP	1/9/09	Added and deleted volumes reported in FY07 <i>Annual Update</i> . Extended CP Activity 3.1.8(A) Compliance Date to 8/28/09. Extended CP 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 CP Activity 3.3.4 (A) Compliance Date 12/01/13 and CP Activity 3.3.4 (B) Compliance Date 12/31/13. Extended CP Activity 3.2(J) Compliance Date to 12/31/10.
Rev 19.0	STP/CP	2/5/10	Added and deleted volumes reported in FY08 <i>Annual Update</i> . Extended compliance date for CP Activities 3.1.8(A) and 3.1.9(A) to 8/28/12. Proposed a new milestone of 12/31/2010 for 3.1.4(A) and a new milestone 3.3.4(C) for 10-100 nCi/g Waste.
Rev 20.0	STP/CP	11/8/10	Added and deleted volumes reported in FY09 <i>Annual Update</i> . Proposed an extended compliance date for CP Activity 3.2(J).
Rev 21.0	STP/CP	3/21/12	Added and deleted volumes reported in FY10 <i>Annual Update</i> . Proposed new compliance date for CP Activity 3.1.8(A).
Rev 22.0	STP/CP	12/10/12	Added and deleted volumes reported in FY11 <i>Annual Update</i> .
Rev 23.0	STP/CP	08-26-2015	Added and deleted volumes reported in FY12 <i>Annual Update</i> Added Table 4.0-1 Treatability Groups for the Framework Agreement MTRU Waste
Rev 24.0	STP/CP	08-26-2015	Added and deleted volumes reported in FY13 <i>Annual Update</i> Proposed compliance date for CP Activity 3.1.5(A) Proposed compliance date for CP Activity 3.1.8(A) Extended CP Activity 3.2(J) Compliance Date to 6/30/2018 Proposed compliance date for CP Activity 3.3.4 (A and B)

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev 25.0	STP/CP	TBD	Added and deleted volumes reported in FY14 Annual Update On Hold volumes reported shipped in FY14 Annual Update Proposed compliance date for CP Activity 3.1.8(A) Proposed compliance date for CP Activity 3.3.4 (A and B)
Rev 26.0	STP/CP	TBD	Added and deleted volumes reported in FY15 Annual Update On Hold volumes reported shipped in FY14 Annual Update Proposed compliance date for CP Activity 4.0-2 (C)

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September 24, 2015  
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**Los Alamos National Laboratory  
Federal Facility Compliance Order  
Annual Site Treatment Plan Update  
for Fiscal Year 20154**



Prepared by the Waste Management Division

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## CONTENTS

<b>ACRONYMS</b> .....	<b>VII</b>
<b>INTRODUCTION</b> .....	<b>1</b>
<b>PART I BACKGROUND UPDATE</b> .....	<b>2</b>
<b>1.0 INTRODUCTION</b> .....	<b>2</b>
<b>2.0 AMOUNT OF EACH COVERED WASTE STORED AT LANL</b> .....	<b>2</b>
2.1 Mixed Low-Level Waste (MLLW) Inventory.....	2
2.2 MTRU Inventory Summary .....	3
<b>3.0 TREATMENT PROGRESS</b> .....	<b>5</b>
3.1 Offsite Treatment .....	5
3.2 Offsite Recycling.....	6
3.3 Onsite Treatment and Recycling .....	6
3.4 Onsite Lead Decontamination .....	6
3.5 Treatability Studies .....	6
3.6 Administrative Adjustments and Corrections.....	6
3.6.1 Adjustments to MLLW Inventory.....	6
3.6.2 Adjustments to MTRU Inventory .....	6
<b>4.0 TREATMENT TECHNOLOGY DEVELOPMENT</b> .....	<b>6</b>
4.1 Treatment Technologies Being Evaluated.....	7
4.1.1 Offsite Commercial Treatment Facilities .....	7
4.1.2 Offsite DOE Treatment Facilities .....	7
<b>5.0 DOE FUNDING FOR STP-RELATED ACTIVITIES</b> .....	<b>7</b>
<b>6.0 TREATMENT VARIANCES</b> .....	<b>8</b>
6.1 WIPP No-Migration Variance Petition/Land Withdrawal Act Amendments.....	8
6.2 Other Treatment Variance(s).....	8
<b>7.0 WIPP FACILITY CAPABILITIES</b> .....	<b>8</b>
7.1 Characterization Capabilities at WIPP .....	9
7.2 MTRU Treatment Capabilities and Plans.....	9
<b>PART II COMPLIANCE PLAN UPDATE</b> .....	<b>10</b>
<b>1.0 INTRODUCTION</b> .....	<b>10</b>
<b>2.0 CHANGES AND REVISIONS TO THE CP OCCURRING SINCE THE PREVIOUS ANNUAL UPDATE</b> .....	<b>10</b>
2.1 Activities Completed During FY15.....	10
2.2 Expedited Shipment Letters .....	10
2.3 Correspondence .....	10
<b>3.0 DESCRIPTION OF DELETED WASTE</b> .....	<b>11</b>
<b>4.0 DOCUMENTATION OF NEW COVERED WASTE</b> .....	<b>11</b>
<b>5.0 PROPOSED CHANGES TO THE CP SCHEDULE</b> .....	<b>11</b>
<b>6.0 DETAILED DESCRIPTION OF THE PROPOSED REVISION</b> .....	<b>14</b>
6.1 Addition of New Covered Waste .....	14
6.1.1 MLLW Additions.....	14
6.1.2 MTRU Waste Additions .....	14
6.2 Deletion of Covered Waste .....	15
6.2.1 Deletion of MLLW .....	15
6.2.2 Deletion of MTRU Waste.....	15
6.2.3 Other Deletions of FY15 Waste.....	16
6.3 Adjustments to the Original (October 4, 1995) STP-Covered MLLW Inventory .....	16
6.4 Adjustments to MTRU Waste Inventory.....	16
6.5 Establishment of New Milestone Activity Dates.....	16
6.6 Additional Revisions .....	16
<b>7.0 RATIONALE FOR THE PROPOSED REVISION</b> .....	<b>16</b>
7.1 Establishment of New Proposed Milestone.....	16
7.2 Addition of New Covered Waste .....	16
7.3 Deletion of Covered Waste .....	17
7.4 Adjustments to the Original (October 4, 1995) STP-Covered Waste Inventory .....	17

<b>8.0</b>	<b>ANTICIPATED LENGTH OF ANY DELAY IN PERFORMANCE .....</b>	<b>17</b>
<b>9.0</b>	<b>PLAN AND SCHEDULE FOR IMPLEMENTING ALL REASONABLE MEASURES .....</b>	<b>17</b>
<b>PART III COMPLIANCE PLAN – PROPOSED REVISION 26.0.....</b>		<b>18</b>
<b>1.0</b>	<b>PURPOSE AND SCOPE OF THE CP .....</b>	<b>18</b>
1.1	Introduction .....	18
<b>1.2</b>	<b>STP Revisions and Amendments .....</b>	<b>18</b>
<b>2.0</b>	<b>COMPLIANCE SCHEDULES .....</b>	<b>18</b>
2.1	Categories of Activities for Compliance Dates .....	18
2.1.1	Plans Where Treatment Technology Exists .....	18
2.1.2	Plans Where Technology Must Be Developed.....	19
2.2	Primary Preferred Treatment.....	19
2.3	Plans for Mixed Waste to be Shipped Offsite for Treatment .....	19
2.3.1	Specific Site Requirements for Noncommercial Treatment Facilities .....	20
2.4	Requirements Pertaining to Radionuclide Separation .....	21
2.5	Plans Related to Other Mixed Waste Activities .....	21
2.6	Recycling/Re-Use.....	21
2.7	Onsite Radiological Decontamination.....	22
<b>3.0</b>	<b>MLLW STREAMS .....</b>	<b>22</b>
3.1	Mixed Waste Streams.....	23
3.1.1	IPA Wastes and Scintillation Fluids.....	23
3.1.2	Lead Blankets, Soil with Heavy Metals, Environmental Restoration (ER) Soils.....	23
3.1.3	Aqueous Organic Liquids .....	23
3.1.4	Organic-Contaminated Combustible Solids.....	24
3.1.5	Combustible Debris, Activated or Inseparable Lead, Noncombustible Debris.....	24
3.1.6	Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates.....	25
3.1.7	Water-Reactive Metal .....	25
3.1.8	Compressed Gases Requiring Scrubbing .....	25
3.1.9	Compressed Gases Requiring Oxidation.....	26
3.1.10	Elemental Mercury.....	26
3.1.11	Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, Polychlorinated Biphenyl (PCB) Wastes with RCRA Components, Liquid and Solid Oxidizers .....	26
3.2	Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done.....	27
3.3	Plans for Other Types of Activities.....	28
3.3.1	Lead Decontamination .....	28
3.3.2	Sorting, Surveying, and Decontamination .....	29
3.3.3	Lead Requiring Sorting .....	29
3.3.4	10–100 nCi/g Waste.....	30
3.4	Management of “Missing” Items.....	31
<b>4.0</b>	<b>MTRU WASTE .....</b>	<b>31</b>
4.1	Management of “Missing” Items.....	33
<b>APPENDIX A</b>	<b>CURRENT YEAR MLLW INVENTORY DETAIL .....</b>	<b>36</b>
<b>APPENDIX B</b>	<b>CURRENT YEAR MLLW SHIPMENT DETAIL .....</b>	<b>39</b>
<b>APPENDIX C</b>	<b>CURRENT YEAR MLLW ADMINISTRATIVE ADJUSTMENTS.....</b>	<b>42</b>
<b>APPENDIX D</b>	<b>PREVIOUS YEAR MLLW INVENTORY DETAIL .....</b>	<b>53</b>
<b>APPENDIX E</b>	<b>CURRENT MTRU INVENTORY DETAIL .....</b>	<b>58</b>
<b>APPENDIX F</b>	<b>FY15 MTRU WASTE SHIPMENTS TO WIPP .....</b>	<b>61</b>
<b>APPENDIX G</b>	<b>CURRENT YEAR MTRU INVENTORY – ADMINISTRATIVE ADJUSTMENTS .....</b>	<b>63</b>
<b>APPENDIX H</b>	<b>MLLW TREATMENT FACILITIES .....</b>	<b>67</b>
<b>APPENDIX I</b>	<b>CORRESPONDENCE.....</b>	<b>68</b>
<b>APPENDIX J</b>	<b>HISTORY OF CHANGES TO THE CP AND FFCO .....</b>	<b>71</b>
<b>REFERENCES</b>	<b>.....</b>	<b>74</b>

**TABLES**

**Part I**

Table 2.1-1 FY15 MLLW Inventory Summary.....3  
 Table 2.2-1 Covered MTRU Inventory Summary.....4  
 Table 2.1-1 FYXX FFCO and STP Milestones Compilation [Table omitted] .....10

**Part II**

Table 6.1.1-1 Proposed Addition of New-Covered MLLW Waste .....14  
 Table 6.1.2-1 Proposed Addition of New Covered<sup>1</sup> MTRU Waste.....15  
 Table 6.1.2-2 Proposed Addition of Waste Newly Characterized as MTRU .....15

**Part III**

Table 2.1.1-1 Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies ..18  
 Table 2.1.2-1 Categories of Activities for Compliance Dates for Mixed Waste Without Existing Treatment Technologies .....19  
 Table 2.3-1 Activities for Offsite Shipment for Treatment or Recycling at a Commercial Facility.....19  
 Table 2.3-2 Activities for Shipment Offsite for Treatment or Recycling at a Noncommercial Facility.....20  
 Table 2.4-1 Activities for Radionuclide Separation.....21  
 Table 2.6-1 Requirements for Recycling .....22  
 Table 2.7-1 Activities for Radiological Decontamination .....22  
 Table 3.1.1-1 Treatability Groups for IPA Wastes and Scintillation Fluids .....23  
 Table 3.1.2-1 Treatability Groups for Lead Blankets, Soil with Heavy Metals, ER Soils.....23  
 Table 3.1.3-1 Treatability Groups for Aqueous Organic Liquids .....23  
 Table 3.1.3-2 Additional Treatability Groups for Aqueous Organic Liquids .....24  
 Table 3.1.4-1 Treatability Groups for Organic-Contaminated Combustible Solids .....24  
 Table 3.1.4-2 Treatability Groups for Organic-Contaminated Noncombustible Solids .....24  
 Table 3.1.5-1 Treatability Groups for Combustible Lead, Activated or Inseparable Lead, and Noncombustible Debris .....24  
 Table 3.1.6-1 Treatability Groups for Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates .....25  
 Table 3.1.7-1 Treatability Groups for Water-Reactive Metal.....25  
 Table 3.1.8-1 Treatability Groups for Compressed Gases Requiring Scrubbing.....25  
 Table 3.1.8-2 Activities and Compliance Dates for Compressed Gases Requiring Scrubbing .....25  
 Table 3.1.9-1 Treatability Groups for Compressed Gases Requiring Oxidation .....26  
 Table 3.1.10-1 Treatability Groups for Elemental Mercury .....26  
 Table 3.1.11-1 Treatability Groups for Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components.....26  
 Table 3.1.11-2 Additional Treatability Groups.....27  
 Table 3.2-1 Treatability Groups for Waste Requiring Characterization or Assessment.....27  
 Table 3.2-2 Additional Wastes Requiring Characterization or Assessment .....27  
 Table 3.2-3 Activities and Compliance Dates for Wastes Requiring Characterization or Assessment .....28  
 Table 3.3.1-1 Treatability Groups for Lead Decontamination.....28  
 Table 3.3.1-2 Additional Wastes for Lead Decontamination .....29  
 Table 3.3.2-1 Treatability Groups for Sorting, Surveying, and Decontamination .....29

Table 3.3.2-2	Additional Wastes for Sorting, Surveying, and Decontamination.....	29
Table 3.3.3-1	Treatability Groups for Lead Requiring Sorting .....	29
Table 3.3.4-1	Treatability Groups for 10–100 nCi/g Waste .....	30
Table 3.3.4-2	Activities and Compliance Dates for 10–100 nCi/g Waste .....	30
Table 3.4-1	Waste Category for “Missing Waste” .....	31
Table 4.0-1	Treatability Groups for The Framework Agreement MTRU Waste (remaining original containers) 32	
Table 4.0-2	Activities and Compliance Dates for MTRU Inventory at TA-55 and CMR from Table E-2 .....	33
Table 4.1-2	Waste Category for “Missing Waste” .....	33
Table 4.1-2	Waste Category for “Missing Waste” – Detail [Table Omitted] .....	34

**Appendix Tables**

Table A-1	FY15 MLLW Inventory Detailed Update by Treatability Group.....	36
Table B-1	MLLW Shipped Offsite for Treatment and Disposal in FY15 <sup>1</sup> .....	39
Table C-1	Administrative Adjustments .....	42
Table C-2	Administrative Adjustment – Detail.....	43
Table D-1	FY14 MLLW Inventory <sup>1</sup> Detailed Update by Treatability Group.....	53
Table E-1	TA-54 MTRU Covered Inventory (by Treatability Group).....	58
Table E-2	MTRU Inventory at TA-55 and CMR.....	60
Table F-1	FY15 MTRU Shipments to WIPP.....	61
Table F-2	FY14 MTRU Shipments to WCS <sup>2</sup> .....	62
Table F-3	FY14 MTRU Shipments to AMWTP (INL) <sup>3</sup> .....	62
Table F-4	FY14 MTRU Shipments to WIPP <sup>2</sup> .....	62
Table G-1	FY15 MTRU Administrative Adjustments to TA-54 Inventory .....	63
Table G-2	FY15 MTRU Administrative Adjustments for CMR and TA-55 Inventory .....	66
Table G-3	MTRU Administrative Adjustments – TA-54 Volume Adjustments [Table omitted] .....	66
Table G-4	MTRU Administrative Adjustments – TA-54 Containers Added [Table omitted] .....	66
Table H-1	Commercial Facilities Contacted for Waste Treatment Capabilities.....	67
Table I-1	Expedited Shipment Letters [Table omitted].....	68
Table I-2	Correspondence .....	68
Table J-1	Summary of Changes to the CP and the FFCO .....	71

## ACRONYMS

40 CFR	Title 40 of the Code of Federal Regulations
AMWTP	Advanced Mixed Waste Treatment Plant
CCA	Compliance Certification Application
CCP	Central Characterization Project
CMR	Chemistry and Metallurgy Research (Building)
CP	Compliance Plan
<del>CVD</del>	<del>Confinement Vessel Disposition (project)</del>
DOE	U.S. Department of Energy
<del>DSA</del>	<del>Documented Safety Analysis</del>
EM	Environmental Management
EPA	U.S. Environmental Protection Agency
ER	Environmental Restoration
FFCA	Federal Facility Compliance Act
FFCO	Federal Facility Compliance Order
<del>FR</del>	<del>Federal Register</del>
FY	<del>F</del> fiscal <del>Y</del> year
HWA	Hazardous Waste Act
<del>HWB</del>	<del>Hazardous Waste Bureau</del>
INL	Idaho National Laboratory
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
LDR	Land Disposal Restrictions (RCRA)
<del>LLW</del>	<del>low-level waste</del>
LWAA	Land Withdrawal Act Amendments
<del>M&amp;EC</del>	<del>Materials and Energy Corporation</del>
MLLW	<del>M</del> ixed <del>L</del> ow- <del>L</del> evel <del>W</del> aste
MTRU	<del>M</del> ixed <del>T</del> ransuranic (Waste)
MWIR	Mixed Waste Inventory Report
<del>NMAC</del>	<del>New Mexico Administrative Code</del>
NMED	New Mexico Environment Department

PCB	<del>P</del> polychlorinated <del>B</del> iphenyl
<del>PISA</del>	<del>P</del> otential <del>I</del> nadequacy in the <del>S</del> afety <del>A</del> nalysis
RCRA	Resource Conservation and Recovery Act
<del>RTR</del>	<del>R</del> eal <del>t</del> ime <del>r</del> adiography
STP	Site Treatment Plan
<del>SWB</del>	<del>s</del> tandard <del>w</del> aste <del>b</del> ox
TA	Technical Area
TBD	<del>T</del> o be determined
TBV	<del>T</del> o be verified
TRU	<del>T</del> ransuranic
UC	University of California
WCRRF	Waste Characterization, Reduction, and Repacking Facility
WCS	Waste Control Specialists, LLC
WIPP	Waste Isolation Pilot Plant

## INTRODUCTION

On October 6, 1992, Congress passed the Federal Facility Compliance Act (FFCA) to address compliance by the U.S. Department of Energy (DOE) with the Land Disposal Restrictions (LDR) for the storage of mixed waste set forth in Section 3004(j) of the Resource Conservation and Recovery Act (RCRA). The FFCA requires 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 [the RCRA](#). The FFCA 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, the FFCA requires NMED to provide public notice, consider public comments, and consult with the U.S. Environmental Protection Agency (EPA) and any other state in which a facility affected by the STP is located.

On October 4, 1995, ~~the~~ NMED issued a Federal Facility Compliance Order (FFCO) to DOE and ~~its~~ ~~the~~ [the](#) management and operating contractor, the University of California (UC) Regents. On June 1, 2006, Los Alamos National Security, LLC (LANS) replaced UC as operating contractor of Los Alamos National Laboratory (LANL). ~~at which time~~ LANS [then](#) assumed responsibility for [FFCO](#) compliance ~~with the FFCO~~.

The FFCO required DOE/LANS to implement an STP for the treatment of mixed waste at LANL. The STP is intended to fulfill the [FFCA](#) requirements ~~of the FFCO~~ and establish an enforceable framework to allow DOE and LANS (Respondents) to achieve full compliance with LDR requirements under the New Mexico Hazardous Waste Act (HWA) and RCRA. The compliance dates set forth in the STP 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.

On March 31, 1995, DOE submitted its proposed STP, which addressed treatment capacities and technologies to treat all of LANL's mixed waste, regardless of the time it was generated, to NMED. On April 17, 1995, the public was provided an opportunity to comment to NMED on DOE's draft STP. After considering public comment and otherwise complying with the FFCA, NMED approved the draft STP with modifications.

Section VII of the FFCO requires DOE/LANS to submit an Annual STP Update to ~~the~~ NMED each year on or before March 31. The FFCO requires that the Annual Update bring the information in both the Background and the Compliance Plan (CP) current to the end of the previous federal fiscal year (FY). Part I of this Annual Update constitutes the update to the Background. Part II contains the changes that have occurred since the last Annual Update and also identifies proposed revisions and amendments to the CP. Part III incorporates the changes in Part II into the proposed CP revision (Revision ~~265.0~~).

## PART I BACKGROUND UPDATE

### 1.0 INTRODUCTION

The Background (Part I) provides the following information.

- The estimated volume of covered waste in storage at the end of the previous FY and anticipated to be placed in storage for the next five FYs.
- A progress report from the end of the previous federal FY 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.
- A progress report on characterization and/or treatment capabilities or plans for mixed transuranic (MTRU) waste related to the waste treatment standards, if any, for the DOE Waste Isolation Pilot Plant (WIPP) facility near Carlsbad, New Mexico.

The STP-covered waste inventory is verified during quality control activities. Inconsistencies in treatability group or volume between the original inventory and the current inventory may exist. These inconsistencies are reconciled annually with the STP update.

### 2.0 AMOUNT OF EACH COVERED WASTE STORED AT LANL

#### 2.1 Mixed Low-Level Waste (MLLW) Inventory

During FY154, STP-covered MLLW inventories ~~increased~~ decreased from approximately 14100 m<sup>3</sup> to 3614 m<sup>3</sup>. The ~~increase~~ decrease was mainly due to the ~~restricted movements of waste onsite at Area G since early calendar year 2015, while inadequacies with Area G Safety Basis assumptions on combustible waste fraction are being analyzed and corrected.~~ This restriction will delay the final confirmation, characterization, certification, and shipment for offsite treatment and disposal of these containeres until the Safety Basis issues are resolved and the restrictions on moving this waste are lifted. ~~FY13 and FY14 budget augment that increased shipments of 10-100 nCi/g Waste along with the waste identified in the Framework Agreement. In FY14, the reclassified waste inventory (201,4007 m<sup>3</sup>) was completed before the April 16, 2014 compliance date as proposed in the FY12 STP Annual Update. The remaining STP covered FY13 and FY14 MLLW inventory (approximately 14 m<sup>3</sup>) being readied for shipment and recharacterized during FY15.~~ Table 2.1-1 summarizes changes to the estimated FY154 STP-covered MLLW inventory. ~~Approximately 709 m<sup>3</sup> of covered MLLW was treated, recycled, disposed of, or otherwise deleted during FY14.~~

Appendix A provides the detailed changes to the FY154 covered MLLW inventory by treatability group, including the inventory at Technical Area (TA)-55 and the Chemistry and Metallurgy Research Building (CMR). Appendix B (Table B-1) lists the FY153 MLLW shipments. Table B-2 identifies other deleted waste. If any, administrative adjustments to the MLLW inventory are shown in Appendix C (Table C-1).

Detailed information about the administrative adjustments in Table C-1 are shown in Table C-2. The MLLW inventory reported in the FY143 Annual Update is included as Appendix D.

Table 2.1-1 FY154 MLLW Inventory Summary

Contribution	Volume (m <sup>3</sup> ) <sup>1</sup>
Estimated MLLW Inventory Reported in FY143 Annual Update	<del>13.679</del> <del>100.381</del>
Proposed Revision <del>265.0</del>	
New Covered Waste	<del>0.644</del> <del>0.208</del>
Administrative Adjustments <sup>2</sup>	<del>21.366</del> <del>21.721</del>
Offsite Treatment	<del>NA</del> <sup>3</sup> <del>708.634</del>
Offsite Recycle	NA <sup>3</sup>
Onsite Decontamination	NA
Treatability Study Use	NA
<b>Estimated MLLW Inventory Reported in FY153 Annual Update</b>	<del>13.679</del> <del>135.689</del>

<sup>1</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322

<sup>2</sup> Includes transfers of MTRU and other wastes into MLLW categories

<sup>3</sup> NA = No Activity

## 2.2 Mixed Transuranic (MTRU) Inventory Summary

During FY154, STP-covered MTRU inventories ~~decreased~~~~increased~~ from approximately ~~916~~~~342~~ m<sup>3</sup> to ~~938~~~~946~~ m<sup>3</sup>.

Table 2.2-1 summarizes changes to the estimated FY154 MTRU covered waste inventory. The total volume of MTRU waste in Table 2.2-1 includes the CMR and TA-55 MTRU volumes, which are maintained in a separate inventory from the MTRU inventory at TA-54. Appendix E contains additional detail for the MTRU inventory; Table E-1 covers the TA-54 inventory; and Table E-2 covers the inventory at CMR and TA-55. The volume of STP-covered MTRU waste that is part of the “non-cemented above-ground Environmental Management (EM) Legacy TRU” (MTRU waste only) has been summarized in Appendix E-1 and Section 4.0 of the ~~Compliance Plan~~~~CP Volume~~. Appendix F (Table F-1) provides a summary of FY153 MTRU shipments to WIPP. In Appendix G, Tables G-1 and G-2 describe the administrative adjustments that were made to resolve differences in the TA-54 and the CMR/TA-55 MTRU inventory data, respectively. DOE/LANS anticipates STP-covered MTRU inventory increases because of the WIPP shutdown as of February 14, 2014.

Administrative adjustments typically represent the following types of activities:

- DOE/LANS may correct database entries so that waste items not previously listed as STP waste are now identified as STP waste.
- DOE/LANS may correct waste data, such as volume or EPA codes, through quality control activities. Under DOE standards, waste that was formerly classified as MTRU because it had radioactivity greater than 10 nCi/g has been reclassified to MLLW (LA-W935) if its activity is less than 100 nCi/g.

- New analytical data may also require that waste streams previously managed as transuranic (TRU) waste should, as a prudent measure, be reclassified and managed as MTRU waste.
- During repacking or other quality control activities, TRU waste may be recharacterized as MTRU waste when previously unidentified hazardous contents, such as lead, are determined to be present.
- During repacking, treatability groups are frequently reassigned to be consistent with current management and shipping criteria.
- Containers of waste are occasionally determined not to belong to mixed waste streams and are reclassified as TRU waste; removal of WIPP-prohibited items, if they are the only hazardous constituent, will result in the remaining waste being classified as nonmixed.
- Addition or removal of 85-gallon overpacks changes the volume of waste in the inventory; rounding container volumes to three decimal places also changes the inventory volume.

Appendix G includes changes to the MTRU waste inventory that resulted from repacking activities. MTRU waste volumes in the STP inventory reflect the volume of the container rather than the volume of the contents. When containers are repacked, the STP inventory volume of any given treatability group may either increase or decrease. When a container is repacked, the contents are sometimes split into two or more new containers to meet shipping and waste acceptance criteria or to meet characterization criteria (e.g., nondestructive analysis calibration limits). In addition, the new containers may be assigned to different treatability groups depending on the contents of each drum. Therefore, the volume of a single drum may ‘multiply’ into more volume than the original container. For example, repacking one container of *Cemented Sludge* (0.208 m<sup>3</sup>) may result in one drum of *Combined Combustible-Noncombustible Waste* (0.208 m<sup>3</sup>) and one drum of *Noncombustible Waste* (0.208 m<sup>3</sup>). In addition, changes in the waste volume in the STP inventory occur when an 85-gallon ‘overpack’ is removed from, or added to, a 55-gallon drum during repackaging. Removal of overpacks decreases the volume of waste in the STP inventory. Adding an overpack to a 55-gallon drum increases the volume of waste shown in the STP inventory.

Table 2.2-1 Covered MTRU Inventory Summary

Description		Volume (m <sup>3</sup> )
Covered MTRU Inventory Reported in FY14 <del>3</del> ( <del>42,357,46.965</del> m <sup>3</sup> at CMR/TA-55 and <del>873,759,264.723</del> m <sup>3</sup> at TA-54)		<del>916,116,434.688</del>
New Covered MTRU Waste at TA-54		<del>6,0383.120</del>
New Covered MTRU Waste at CMR/TA-55		<del>11,0586.092</del>
Covered MTRU Waste Shipped to WIPP in FY1 <del>5</del> 4 below grade		<del>0,000-208.2140</del>
Covered MTRU Waste Shipped to WIPP in FY14 remaining above grade (on hold per NMED)	9.048 <sup>1</sup>	
Covered MTRU Waste Shipped to Waste Control Specialists, LLC (WCS), Texas in FY14 (on hold per <del>the</del> NMED)	155.718 <sup>1</sup>	
Covered MTRU Waste Shipped to the Advanced Mixed Waste Treatment Plant (AMWTP)- <del>for</del> DOE, Idaho in FY14 (on hold per <del>the</del> NMED)	22.892 <sup>1</sup>	
Net Administrative Adjustments for TA-54 in FY14		<del>11,984-185.870</del>
Net Administrative Adjustments for CMR/TA-55 in FY14		<del>7,571-10,700</del>
<b>Covered MTRU Inventory at End of FY1<del>5</del>4</b>		<del><b>937,625,916.11</b></del>

Description	Volume (m <sup>3</sup> )
	6

<sup>1</sup> Volume not to be subtracted from the STP inventory. Removal of this waste from STP inventory is on hold until NMED approval is received.

### 3.0 TREATMENT PROGRESS

#### 3.1 Offsite Treatment

DOE/LANS did not ship ~~offsite~~ any STP-covered MLLW ~~offsite~~ for treatment and/or disposal in FY15. During FY14, covered MLLW streams were shipped for treatment to the following offsite commercial treatment facilities: Perma Fix in Gainesville, Florida; Perma Fix/Material and Energy Corporation (M&EC) in Oak Ridge, Tennessee; and Perma Fix Northwest in Richland, Washington; and Waste Control Specialist LLC (WCS) in Andrews, Texas:

##### Perma Fix/Florida

Perma Fix in 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 solvent extraction, demulsification/precipitation/flocculation, chelation, oxidation-reduction, ion exchange, absorption/adsorption, amalgamation, and chemical decontamination.

##### Perma Fix/Material and Energy Corporation (M&EC)

M&EC, located in the East Tennessee Technology Park in Oak Ridge, Tennessee, is a permitted treatment facility for low-level radioactive and MLLW. The facility installed six treatment processes and has the capability for 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.

##### Perma Fix Northwest

Perma Fix Northwest, located in Richland, Washington, is a permitted treatment facility for the treatment of low-level radioactive and MLLW. The site houses both a low-level radioactive waste treatment facility and a MLLW treatment facility, licensed under Nuclear Regulatory Commission regulations (State of Washington licenses WN-100393-1 and WN-100508-1) and permitted under RCRA regulations through the State of Washington. The facility can perform thermal treatment, compaction, macroencapsulation, neutralization, and stabilization.

##### Waste Control Specialists LLC (WCS)

WCS, located in Andrews, Texas, is a permitted treatment facility for the treatment and disposal of low-level radioactive and MLLW. The site has regulatory authorization for industrial solid waste and hazardous waste storage, processing, and land disposal under RCRA permit # HW-50358 granted by the state of Texas. EPA has authorized the site for treatment, storage, and land disposal of Toxic Substances Control Act (TSCA) wastes (TXD988088464). The facility can process waste that requires compaction, microencapsulation, macroencapsulation, neutralization, deactivation, chemical oxidation, chemical reduction and stabilization.

Appendix B summarizes LANL's offsite shipments for treatment and/or disposal of covered MLLW in FY154. ~~Approximately 709 m<sup>3</sup> of STP-covered MLLW was shipped offsite for treatment and/or disposal.~~

### 3.2 Offsite Recycling

~~DOE/LANSLANL~~ did not recycle any STP-covered MLLW offsite in FY154.

### 3.3 Onsite Treatment and Recycling

~~DOE/LANSLANL~~ did not treat or recycle any STP-covered MLLW onsite in FY154.

### 3.4 Onsite Lead Decontamination

No LANL STP-covered MLLW was decontaminated onsite during FY154.

### 3.5 Treatability Studies

~~DOE/LANSLANL~~ conducted no treatability studies in FY154.

### 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 the STP Annual Update. A data quality review is conducted annually to compare shipment notifications and shipping manifests with database updates.

#### 3.6.1 Adjustments to MLLW Inventory

Appendix C (Table C-1) details the administrative adjustments to the MLLW inventory. The principal adjustment reflects the transfer of MTRU waste to MLLW (LA-W935, 10–100 nCi/g). A substantial volume of LANL's STP-covered MTRU waste has been determined to no longer meet the criteria for TRU waste and has been reclassified as MLLW. If previously unidentified hazardous ~~waste~~ ~~constituents~~ ~~materials~~, such as lead, are revealed during repacking or other quality control activities, low-level waste may be recharacterized as MLLW. (Appendices C and G).

#### 3.6.2 Adjustments to MTRU Inventory

During the preparation of the FY154 STP Annual Update, DOE/LANS identified a number of adjustments to the MTRU inventory volume (Appendix G, Tables G-1 and G-2), including additions of newly-identified STP-covered waste, recharacterization of waste, and reclassification of MTRU waste to MLLW. Other adjustments were needed to account for volume changes due to repacking of waste and transfers of waste from one treatability group to another or to correct database entries.

## 4.0 TREATMENT TECHNOLOGY DEVELOPMENT

During FY154, the availability of commercial and federal facility offsite 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 prioritized to support offsite 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/LANS continues 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. ~~DOE/LANS are~~ currently developing treatment technologies to address the type of ~~transuranic~~ TRU waste associated with the February 14, 2014, release of radioactivity at ~~the Waste Isolation Pilot Plant (WIPP). The treatment process is intended specifically intended to address remaining~~ remediated nitrate salt ~~(RNS)~~, unremediated nitrate salt ~~(UNS)~~, and cemented nitrate salt wastes remaining at LANL, as required by Settlement Agreement and Stipulated Final Order ~~(SFO)~~ Hazardous Waste Bureau (HWB) 14-20. ~~Numerous other commercially developed treatment processes exist that have not been demonstrated on mixed wastes.~~

~~DOE/LANS re-evaluated all nitrate salt-bearing transuranic TRU waste and have determined the three types of waste located at LANL that will require treatment prior to acceptance at WIPP. Methods for treatment of these wastes are currently under development by DOE/LANS. Methods will utilize~~ surrogates for the waste and both onsite and offsite testing facilities to evaluate treatment effectiveness. After confirmation of the treatment process for these wastes, permitted onsite treatment will be requested from the NMED-HWB.

##### 4.1.1 Offsite Commercial Treatment Facilities

DOE/LANS continues to monitor the availability and capabilities of offsite commercial facilities for treatment technologies and permitting that are appropriate to LANL waste. These facilities are listed in Appendix H (Table H-1).

##### 4.1.2 Offsite DOE Treatment Facilities

~~DOE/LANS continues to monitor the availability and capabilities of offsite DOE facilities for treatment technologies and permitting that are appropriate to LANL waste. -In the past, DOE/LANS has shipped nine corrugated metal boxes (CMBs) to the Idaho National Laboratory Advanced Mixed Waste Treatment Plant (AMWTP) for treatment. -These nine boxes CMBs were successfully treated at the AMWTP and are stored at the Waste Control Specialists, LLC (WCS) facility until WIPP is re-opened to ready to accept waste. During FY14, DOE/LANS received approval from NMED to ship approximately 18 corrugated metal boxes (CMBs) to Idaho National Laboratory (INL) for TRU waste remote handling and repackaging with final disposition at WIPP. These CMBs were packaged at the Waste Characterization, Reduction, and Repackaging Facility in the early 1980s. The INL Advanced Mixed Waste Treatment Plant (AMWTP) was the desired receiving facility for this work. The AMWTP is a 500 million dollar state-of-the-art repackaging facility that uses robotic equipment to size reduce metallic waste. Nine CMBs were successfully treated at AMWTP and shipped directly to WCS in November 2014 for storage until WIPP is re-opened to accept waste.~~

#### 5.0 DOE FUNDING FOR STP-RELATED ACTIVITIES

Funding to implement the LANL STP for mixed waste during FY1~~5~~4 was sufficient to meet all compliance dates as required by the Compliance Plan CP of the STP issued on October 4, 1995. However, DOE/LANS shipments were on hold while DOE/LANS addressed safety basis concerns. -FY16 funding is available to support all compliance dates established in the STP. 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 in all years between FY98 and FY05 and between FY07 and FY14 for shipment of mixed waste offsite for treatment and disposal at DOE and commercial facilities. Funding during FY15 may be

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~~sufficient to meet all compliance dates established in the STP; however, FY15 federal budget restrictions may impact LANL shipping schedules.~~ 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.

## 6.0 TREATMENT VARIANCES

RCRA allows certain case-by-case variances from LDR standards. Variances that may be sought under 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/Land Withdrawal Act Amendments

WIPP, located near Carlsbad, New Mexico, is a DOE repository for TRU waste 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 WIPP Land Withdrawal Act Amendments of 1996 (LWAA) ([Public Law 104-201](#), Section 3188) exempted waste designated by the Secretary of Energy for disposal at WIPP from RCRA's LDRs.

Following passage of the LWAA, the 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 LANL. Other facilities have also shipped non-mixed TRU waste to WIPP. ~~The~~ NMED issued a hazardous waste permit for WIPP on October 27, 1999, authorizing ~~the~~ DOE to manage, store, and dispose of contact-handled MTRU waste at the facility.

### 6.2 Other Treatment Variance(s)

No treatment variances were requested or granted in FY1~~5~~~~4~~.

## 7.0 WIPP FACILITY CAPABILITIES

As discussed above, DOE is disposing of its defense TRU waste, both mixed and nonhazardous, in its deep geologic repository 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 offsite. On February 2014, ~~the~~ NMED received notice of a release at the WIPP nuclear waste repository. A LANL container sent to WIPP experienced an energetic chemical reaction ~~which that~~ ultimately led to the release of radioactive material. ~~The cause of the chemical reaction is still under investigation and the need for additional remediation of these containers is unknown.~~ In light of recent events, and the potential need to re-remediate all nitrate salt-bearing waste, ~~the~~ NMED ~~has~~ determined that the removal of MTRU from the STP will be deferred until more information becomes available and it is determined that waste currently stored at ~~the~~ WCS facility and WIPP ~~remaining above grade~~ will not be returned to LANL. All shipments of MTRU covered waste inventory to WIPP were suspended in May 2014 due to the WIPP shutdown.

### 7.1 Characterization Capabilities at WIPP

Wastes proposed for shipment to WIPP are characterized and certified at LANL by the Central Characterization Project (CCP), a contractor to DOE's Carlsbad Field Office.

### 7.2 MTRU Treatment Capabilities and Plans

WIPP is not required to treat MTRU waste to meet the LDR standards. As described above, the LWAA exempted wastes designated by the Secretary of Energy for disposal at the WIPP from this requirement.

## PART II COMPLIANCE PLAN UPDATE

### 1.0 INTRODUCTION

This update to the CP contains

- Changes to the CP occurring since the previous Annual Update, including
  - correspondence, including notices of shipments; and
  - new covered and deleted waste;
- Proposed revisions and amendments, including
  - compliance date changes;
  - description of waste deleted in accordance with the requirements in FFCO Section IX, *Deletion of Waste*;
  - documentation of new covered waste in accordance with the requirements in Section VIII, *Addition of New Covered Waste*; and
  - proposed changes to the overall schedule in the CP.

### 2.0 CHANGES AND REVISIONS TO THE CP OCCURRING SINCE THE PREVIOUS ANNUAL UPDATE

This section describes revisions, amendments, or other changes to the LANL CP.

#### 2.1 Activities Completed During FY15~~14~~

~~During FY15, no CP Activity milestones were scheduled. Proposed FY12 STP annual milestone schedules completed are shown in Table 2.1-1.~~

Table 2.1-1 ~~FYXX12~~ FFCO and STP Milestones Compilation [Table omitted]

STP/CP Section	MWIR* Waste ID	Treatability Group	FY12 Milestone Net Volume	Compliance Date	Reference Letter
<del>3.3.4</del>	<del>LA-W935</del>	<del>10-100 nCi/g Waste</del>	<del>201.4007</del>	<del>4-16-2014</del>	<del>WM-DO-14-030</del>
<del>3.1.5</del>	<del>LA-W922</del>	<del>Noncombustible Debris Waste</del>	<del>0.208</del>	<del>9-30-2014</del>	<del>WM-DO-14-046</del>
<del>3.1.8</del>	<del>LA-W917</del>	<del>Compressed Gases Requiring Scrubbing</del>	<del>0.832</del>	<del>6-30-2014</del>	<del>WM-DO-14-049</del>

\*MWIR is Mixed Waste Inventory Report

#### 2.2 Expedited Shipment Letters

~~There were no expedited shipment letters in FY15. Expedited shipment letter is listed in Appendix I, Table I-1.~~

#### 2.3 Correspondence

Between October 1, 201~~43~~ and ~~September 30, 2015~~ March 31, 2015, DOE/LANS communicated with the NMED on issues related to:

- FY14 and FY15 waste shipment notifications;
- 15-day notification, proposed deletion of waste;
- Revision 25.0 of the Annual STP Update; and

- [Response to August 26, 2015, Notice of Disapproval.](#)

This correspondence is listed in Appendix I (Table I-2). Correspondence previously listed in Appendix I, Table I-2 of Revision 254.0 of the STP is so noted in the appendix.

### 3.0 DESCRIPTION OF DELETED WASTE

A proposal for deletion of STP waste items is included with this update as Proposed Revision 265.0 in accordance with FFCO Section IX, *Deletion of Waste*. These deletions are proposed because the wastes were shipped offsite for treatment, disposal, or recycling or were otherwise determined not to be mixed wastes. These covered wastes are included in Appendix B, Appendix F, and Appendix G.

### 4.0 DOCUMENTATION OF NEW COVERED WASTE

A proposal for addition of STP waste items is included with this update in accordance with FFCO Section VIII, *Addition of Waste*. These additions consist of wastes placed in storage during FY143 and were proposed to become covered wastes in FY154. These covered wastes are included in Appendix E. Addition of new covered and newly characterized as MTRU waste to be added to the STP is identified in Section 6.1.

### 5.0 PROPOSED CHANGES TO THE COMPLIANCE PLAN SCHEDULE

DOE/LANS is proposing to ~~revise the new~~ milestones for *Compressed Gases Requiring Scrubbing (LA-W917)* Activity 4.0-2(C)3.1.8(A) to “complete transfer of Metallic Waste to CMR for material retrieval, complete shipping of existing wastes to an offsite treatment facility or complete parallel option”; and *10-100 nCi/g Waste (LA-W935)* Activity 3.3.4(A) to “complete radiological characterization” and Activity 3.3.4(B) “complete shipment of existing waste to offsite facility for treatment, or complete parallel options.” This milestone addresses the MTRU metallic waste inventory at TA-55. DOE/LANS expects to be able to complete ~~transfershipping of the metallic~~ wastes by ~~November~~ September 30, 2018.

#### I. Compliance Dates and Waste Description

~~MTRU covered metallic wastes are wastes associated with the Confinement Vessel Disposition (CVD) project. The project involves recovery of materials and wastes from confinement vessels stored at TA-55. The vessels contain important programmatic materials that can be recovered and used in current DOE National Security programs. LA-W917: This waste consists of pressurized pipe overpacks and aerosol cans removed from TRU waste containers during the repackaging process that were assayed and are considered MLLW.~~

Current proposed compliance date: September 30, 2017.5

Proposed Revision 265 compliance date: ~~November~~ September 30, 2018.

~~LA-W935: This waste consists of 10-100 nCi/g derived from TRU and MTRU covered inventory as a result of the repackaging process.~~

~~Current proposed compliance date (A): September 1, 2015, and (B): September 30, 2015~~

~~Proposed Revision 25 compliance date (A): September 1, 2018, and (B): September 30, 2018.~~

## II. ~~Recovery~~~~Treatment~~ Process

~~The CVD project is an onsite radiological decontamination project, as described in Part III (Compliance Plan/CP), Section 2.7 of this STP Update. As described therein, methods such as sand-blasting and hand-scrubbing are used to remove radiologically-contaminated materials and wastes from the interior surfaces of the confinement vessels. The project involves performing the following process steps on each vessel: 1) empty the vessel of its contents; 2) sort and segregate the programmatically-valuable material from the other material in the vessel; 3) decontaminated the vessel to low-level waste (LLW) levels if technically possible, and 4) disposition the removed waste and the emptied vessel in accordance with current radioactive and hazardous waste regulatory requirements. Programmatically-valuable material ~~has been~~was packaged separately and supplied to a LANL research team performing national security work. Material ~~has been~~was removed from ~~two~~ vessels ~~so far~~, and a third ~~has been~~was moved to the recovery facility for processing. The preferred treatment process for LA-W917 and LA-W935 is shipment offsite for treatment to meet LDRs. These wastes may be treated by macroencapsulation and/or thermal treatment or other RCRA treatment methods according to the standards in 40 CFR 268.40 at an offsite commercial facility.~~

## III. Availability of ~~Recovery~~~~Commercial~~ Facilities

~~The project is being executed in Wing 9 of the Chemistry and Metallurgy Research (CMR) Bbuilding at LANL. DOE/LANS notifies NMED in writing at least 15 calendars days before each vessel is transferred to the recovery facility at the CMR building for material retrieval, uses the facilities identified in Appendix H for treatment and disposal of MLLW. No additional facilities are needed to treat the current inventory of Compressed Gases Requiring Scrubbing (LA-W917) and 10-100 nCi/g Waste (LA-W935).~~

## IV. Justification for Milestone

~~This is still a relatively new process that had never been attempted before the first vessel was processed. DOE/LANS ~~are~~is requesting the revised date because of several challenges for meeting the project's original objective ~~that have~~caused unexpected delays affecting the overall project schedule. ~~They~~ delays are as follows:~~

- ~~1) Difficulties with meeting the LLW vessel-decontamination criterion of less than 100 -nancuries/gram. -Some of the vessels encountered so far in this project have so much unexpected embedded material that they will require additional methods for decontamination that are not currently available at the CVD recovery facility. Additional decontamination methods are being investigated at TA-54; however, processes that would constitute physical or chemical treatment of waste would require Respondents to seek a permit before proceeding. -If the LLW criterion cannot be met using the current decontamination process, a vessel may have to be size-reduced into 4four sections; and each section will be discarded as TRU waste.~~
- ~~2) Unforeseen process deviations ~~that~~occurred with the first vessels being processed. ~~They required~~ ~~w~~Work ~~to be~~was paused and placed in a safe configuration while the operating procedure was modified to address the deviation. In a nuclear facility such as CMR building, modifications must follow the Integrated Work Management (~~IWM~~) Process, which includes management approvals and an Unreviewed Safety Questions Determination (~~USQD~~). ~~Finally, w~~Workers were trained to the changed procedure and the procedure was implemeneted in the field. For the cleanout of vessel 1, there were seven procedure changes resulting in a total of about a 14-week delay. As~~

evidence of team learning and process improvement, vessel 2 required only three procedure changes resulting in a total of about a 4-week delay.

~~4) A change required in the CMR authorization basis due to a Potential Inadequacy in the Safety Analysis (PISA) that was declared for the CVD project on February 12, 2015 for the CVD project. The PISA was related to an undefined state for the second vessel being cleaned-out whose where radionuclide quantities exceeded the dose equivalent threshold value for the authorization basis at that facility. The new safety analysis took 11 months to complete, which caused the longest work delay in 2015. While the CMR authorization basis was changed, some processing activities authorized by the current documented safety analysis (DSA) continued on other vessels at the facility; but any significant progress on other vessels was precluded due to the configuration of the second vessel during the pause. Since commercial treatment facilities are available, DOE/LANS does not anticipate any significant delays in shipping this waste offsite for treatment. Prior to shipment, LA-W917 (pressurized pipe overpacks and aerosol cans) need to be verified to be punctured via real-time radiography (RTR) or visual examination. There is no processing capability at TA-54 for containers of pressurized pipe overpack or aerosol cans components. Processing lines must first become available and permitted for RCRA treatment.~~

~~LA-W935 treatability group includes 0.966 m<sup>3</sup> of waste consisting of lead lined empty containers that previously held nitrate salt bearing waste (i.e., an empty parent container). They were retained onsite as potential sources of information during the WIPP drum breach investigation and restricted from shipment. These empty containers were generated by the process of remediating nonconforming MTRU waste containers in order to meet the WIPP WAC. When a parent waste container is remediated, the waste contents are removed, WIPP prohibited items are addressed, and the remaining waste is placed into one or more new containers. After this process is complete, the original parent waste container remains radiologically contaminated and usually can be managed as LLW or MLLW.~~

~~In some cases, the empty parent may still contain residual amounts of waste material and/or packaging material (for example, in most nitrate salt parent drums, a lead liner was used to mitigate radiological dose to the worker). Empty containers are being managed as "RCRA empty" containers if they meet the "RCRA empty" criteria in 40 CFR 261.7. Empty containers that have lead liners must carry an EPA hazardous waste number (HWN) for lead (D008), and be managed as MLLW. If empty containers still contained residual amounts of waste material that do not meet the "RCRA empty" criteria, the containers are to be labeled with the same EPA hazardous waste numbers that the original parent container carried (in addition to D008, if the D008 HWN is associated with a lead liner).~~

~~If the empty parent originally contained nitrate salt bearing waste, then it is possible that trace or residual amounts of nitrate salt bearing waste remain in the empty parent following removal of the original contents. The amounts of residual nitrate salt bearing waste, organic constituents, or other residues remaining in the original containers varies. It will be confirmed on a container-by-container basis using RTR as part of their final characterization and certification for offsite shipment for disposal. Containers that are confirmed not to meet the "RCRA empty" criteria will carry the same EPA hazardous waste numbers as the original parent container and must be managed accordingly. This confirmation process is ongoing.~~

~~Movements of LA-W935 waste onsite at Area G have been restricted since early calendar year 2015, while inadequacies with Area G Safety Basis assumptions on combustible waste fraction~~

~~are analyzed and corrected. This restriction will delay the final confirmation, characterization, certification, and shipment for offsite treatment and disposal of these containers until the Safety Basis issues are resolved and the restrictions on moving and managing this waste are lifted.~~

No other changes to the schedule in the CP of the STP are proposed.

## 6.0 DETAILED DESCRIPTION OF THE PROPOSED REVISION

The purpose of this revision request is to reflect changes in the STP inventories in the LANL CP of the STP in accordance with FFCO Section X.C.2.a. The changes proposed by this revision to the CP 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 CP text changes are indicated in the redlined version provided to the NMED.

DOE/LANS is proposing to revise the CP text to reflect the following change in STP-covered inventories:

- Increases and decreases in covered mixed waste inventories due to the addition of new covered waste and offsite shipments during FY154 and other changes in the STP inventory.

The CP 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*.

### 6.1 Addition of New Covered<sup>1</sup> Waste

DOE/LANS is requesting that the following waste be added to the STP as covered waste.

#### 6.1.1 MLLW Additions

The volume of MLLW requested for addition is 0.644208 m<sup>3</sup> of new-covered ~~Noncombustible Debris~~ 10-100 nCi/g Waste (LA-W935922).

Table 6.1.1-1 Proposed Addition of New-Covered MLLW Waste

CP Section	MWIR <sup>1</sup> Waste ID	Treatability Group	Volume (m <sup>3</sup> ) <sup>2</sup>
<del>3.3.43.1.5</del>	<del>LA-W935</del> LA-W922	<del>10-100 nCi/g Waste</del> Noncombustible Debris	<del>0.644</del> 0.208
<b>Total</b>			<b>0.6440.208</b>

<sup>1</sup>MWIR is Mixed Waste Inventory Report.

<sup>2</sup>~~Corrections were made to the accumulation start date at time of shipment. Real-time radiography TR recharacterization of LLW.~~

#### 6.1.2 MTRU Waste Additions

The volume of new-covered MTRU waste requested for addition is ~~17.0969-212~~ 17.0969-212 m<sup>3</sup> (Table 6.1.2-1). DOE/LANS also requests the addition of ~~1.2885-858~~ 1.2885-858 m<sup>3</sup> of *Combustible-Noncombustible Waste*, previously managed in the TRU inventory (Appendix G, Table G-1). Table 6.1.2-2 identifies waste that is proposed for addition following activities that identified waste in the TRU inventory as MTRU either through review of waste characteristics or as a result of identifying potentially hazardous constituents during repacking TRU waste.

<sup>1</sup> Waste generated during the previous FY that was not shipped offsite within one year is termed new-covered STP waste.

Table 6.1.2-1 Proposed Addition of New Covered<sup>1</sup> MTRU Waste

CP Section	Treatability Group	Volume (m <sup>3</sup> )
4.0	Combustible-Noncombustible Waste	6,0382.912
<del>4.0</del>	<del>Combustible Waste</del>	<del>0.000</del>
<del>4.0</del>	<del>Solidified Inorganic and Organic Waste</del>	<del>0.208</del>
<b>Total TA-54 New Covered Waste</b>		<b>6,0383.120<sup>2</sup></b>
4.0	Combustible-Noncombustible Waste at CMR	4,1883.800
4.0	Combustible-Noncombustible Waste at TA-55	2,9124.252
4.0	Combustible Waste at TA-55	3,1260.208
4.0	Noncombustible Waste at TA-55	0.832
<b>Total CMR/TA-55 New Covered Waste</b>		<b>11,0586.092<sup>3</sup></b>
<b>Total New Covered Waste</b>		<b>17,0969.212</b>

<sup>1</sup> New covered waste in Table 6.1.2-1 refers to waste generated in the previous FY.

<sup>2</sup> Confirmation of re-assay to determine TRU or LLW concentration for containers to continue on a path for disposition. Waste generated during the previous FY that was not shipped offsite within one year. All shipments of MTRU covered waste inventory to WIPP were suspended in May 2014 due to the WIPP shutdown.

<sup>3</sup> Due to updating its Safety Basis documents, TA-54 has temporarily stopped or significantly reduced the receipt of LANL generated MTRU waste at TA-54. New covered waste at TA-55 was a result of radioactive assay problems, radioactive free liquids, and waste containers entrapped in the TA-55 safety pause. New covered waste at CMR was a result of waste containers that have not been completely filled.

Table 6.1.2-2 Proposed Addition of Waste Newly Characterized as MTRU

CP Section	Treatability Group	Volume (m <sup>3</sup> )
4.0	<del>Combustible-Noncombustible Waste (from identification of potentially hazardous constituents based on investigation of characterization of TRU nitrate salt waste during repacking of TRU waste)</del>	<del>1,2885.858</del>
<b>Total Newly Characterized MTRU</b>		<b>1,2885.858</b>

## 6.2 Deletion of Covered Waste

Both MLLW and MTRU wastes were shipped offsite for treatment and disposal or recycling or are otherwise proposed as deleted waste.

### 6.2.1 Deletion of MLLW

No waste was shipped offsite for treatment and disposal or recycling. No waste is proposed for deletion due to treatment and disposal or recycling in FY15. DOE/LANS is requesting that covered MLLW identified in Appendix B be deleted from the STP. These covered wastes were shipped offsite for treatment and disposal or recycling. The total volume of covered MLLW that is requested for deletion under this revision to the CP is 708.631 m<sup>3</sup> (Appendix B, Table B-1).

### 6.2.2 Deletion of MTRU Waste

No waste was shipped offsite for disposal at WIPP. No waste is proposed for deletion in 2015 due to disposal at WIPP. DOE/LANS is requesting that a total of 208.214 m<sup>3</sup> of covered MTRU waste be deleted from the STP. This refers to the volume of covered wastes that were shipped offsite for disposal at WIPP in

~~FY14 and that were placed underground in Panels 6 and 7 prior to February 14, 2014. Other covered MTRU wastes were shipped offsite, but were not placed underground at WIPP prior to February 14, 2014. They are being stored at WIPP and WCS until WIPP once again becomes available for disposal. The NMED has determined that these other covered MTRU wastes will not be removed from the STP until more information becomes available and a determination is made regarding the waste currently stored aboveground at WIPP and at the offsite facility. Details of the offsite shipments are given in Appendix F.~~

### 6.2.3 Other Deletions of FY15~~4~~ Waste

No waste is proposed for deletion due to recycling or onsite treatment in FY15~~4~~. No waste was shipped offsite for treatability studies.

### 6.3 Adjustments to the Original (October 4, 1995) STP-Covered MLLW Inventory

DOE/LANS is requesting adjustments to the original (October 4, 1995) STP-covered MLLW inventory as listed in Appendix C (Table C-1). Most administrative adjustments are due to reclassification of MTRU waste to MLLW treatability groups and to quality control activities related to preparing waste for treatment and disposal. These adjustments may result in additions of newly-identified covered waste or transfers of waste to other treatability groups.

### 6.4 Adjustments to MTRU Waste Inventory

DOE/LANS is requesting adjustments (Appendix G, Tables G-1 and G-2) to the original (October 4, 1995) STP-covered MTRU waste inventory. Most administrative adjustments are due to reclassification of MTRU waste to MLLW treatability groups or to other MTRU treatability groups and to reclassification of TRU to MTRU as a result of quality control activities related to preparing waste for treatment and disposal. These adjustments may result in additions of newly-identified covered waste or transfers of waste to other treatability groups.

### 6.5 Establishment of New Milestone Activity Dates

DOE/LANS is not requesting any new compliance milestones.

### 6.6 Additional Revisions

No other revisions are requested.

## 7.0 RATIONALE FOR THE PROPOSED REVISION

This information is provided in accordance with FFCO Section X.C.2.a.

### 7.1 Establishment of New Proposed Milestone

No new milestones are proposed.

### 7.2 Addition of New Covered Waste

Waste that was newly generated in FY1~~4~~<sup>3</sup>, which was not treated within 12 months of generation, became new covered waste during FY15~~4~~<sup>4</sup> (see Appendix E). In addition, TRU wastes, re-evaluated during repacking and quality control activities as having previously unidentified RCRA constituents, were also added to the STP inventory (Appendix G). 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.

### 7.3 Deletion of Covered Waste

~~Decreases in covered waste inventory reflect the treatment and disposal or recycling of covered waste at offsite commercial facilities during FY14. Deletion of this covered waste is proposed to more accurately reflect the LANL STP inventory as of the end of FY14. There were no deletions of covered waste in FY15.~~

### 7.4 Adjustments to the Original (October 4, 1995) STP-Covered Waste Inventory

Administrative adjustments result from quality control activities related to preparing waste for treatment and disposal. These adjustments result in additions of newly-identified covered waste and transfers of waste to other treatability groups. The adjustments to the original (October 4, 1995) STP-covered waste inventory are proposed to more accurately reflect the LANL STP inventory as of the end of FY15,4.

## 8.0 ANTICIPATED LENGTH OF ANY DELAY IN PERFORMANCE

In accordance with FFCO Section X.C.2.c, DOE/LANS cannot confidently predict the anticipated delay in performance for shipping covered STP MTRU waste for which the only currently allowed deletion pathway is disposal at WIPP. All shipments of MTRU covered waste inventory ~~offsite to WIPP~~ were suspended in May 2014 due to the WIPP shutdown. ~~Off-site management of STP-covered MLLW that may have been associated with or derived from processing MTRU nitrate salts containers has been placed on hold until a regulatory determination can be made confirming that such waste is acceptable for shipping offsite.~~ At this time, DOE/LANS cannot confidently predict when the TA-54 processing lines will come back online for further processing of MTRU and/or MLLW covered waste.

## 9.0 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 (FFCO Section X.C.2.d).

## PART III COMPLIANCE PLAN – PROPOSED REVISION 265.0

### 1.0 PURPOSE AND SCOPE OF THE COMPLIANCE PLAN

#### 1.1 Introduction

Part III of this document identifies changes that require NMED approval as a revision under Section X, *Revisions*, or an amendment under Section XI, *Other Amendments to the STP*.

The CP includes a schedule for offsite 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 [New Mexico Administrative Code \(NMAC\)](#) 4.1, that incorporates by reference 40 CFR Parts 260 through 270. Part I, Background, contains progress reports as required in the FFCO. Respondents shall carry out the activities described in the STP, including the CP, in accordance with the schedules and requirements set forth in the STP and the FFCO.

#### 1.2 STP Revisions and Amendments

The STP CP 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, FFCO, as amended and revised. The history of revisions is provided in Appendix J.

### 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 timeframe 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~~ were identified and developed. For the waste that will be treated onsite, the categories of activities for compliance dates identified in Table 2.1.1-1 shall apply.

Table 2.1.1-1 Categories of Activities for Compliance for Mixed Waste with Existing Treatment Technologies

- |  |
|--|
| <ul style="list-style-type: none"><li>A. Submit permit applications to <del>the</del> NMED.</li><li>B. Initiate construction as specified in the NMED permit.</li><li>C. Complete system testing and commence operation.</li><li>D. Begin treating mixed waste.</li><li>E. Complete treatment of existing wastes to applicable regulatory standards.</li></ul> |
|--|

### 2.1.2 Plans Where Technology Must Be Developed

For some mixed waste, no treatment technologies ~~have been~~ were identified and developed, or the treatment technology must be modified or adapted to apply to such waste. For the waste that will be treated onsite, the categories of activities for compliance dates are identified in Table 2.1.2-1 and shall apply.

Table 2.1.2-1 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

Offsite treatment at a commercial or noncommercial mixed waste treatment facility is the primary preferred treatment option applicable to all mixed waste streams in the STP inventory unless otherwise indicated in the descriptions of individual waste treatability groups. DOE may also pursue parallel treatment options, such as recycling/re-use or radiological decontamination. Requirements for waste shipped offsite for recycling are discussed under Part III, Section 2.6. All activities and compliance dates related to the construction, permitting, and operation of onsite treatment skids were removed from this document. This change was due to the increased availability of offsite treatment and disposal capacity for mixed waste. Respondents will continue evaluating new commercial and DOE offsite treatment facilities as potential options for managing mixed waste, as they become available.

## 2.3 Plans for Mixed Waste to be Shipped Offsite for Treatment

Should DOE decide to treat or recycle waste at a commercial offsite facility (Table 2.3-1), 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/recycling facility.

Table 2.3-1 Activities for Offsite Shipment for Treatment or Recycling at a Commercial Facility

A.	Meet all regulatory requirements for shipment.
B.	Provide documentation to <del>the</del> NMED that waste has been received at an offsite facility for treatment or recycling within 45 working days of receipt of waste at the treatment facility.

DOE shall notify the NMED Project Manager in writing as soon as possible if mixed waste is planned to be sent to a noncommercial facility. Notification should be made if possible when DOE is first

considering such an option to allow ~~the~~ NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed offsite noncommercial 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 45 working days of receipt of waste at the treatment/recycling facility. Activities for mixed waste to be shipped offsite for treatment/recycling at a noncommercial facility are identified in Table 2.3-2.

Table 2.3-2 Activities for Shipment Offsite for Treatment or Recycling at a Noncommercial Facility

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

### 2.3.1 Specific Site Requirements for Noncommercial Treatment Facilities

#### Shipment to Idaho National Laboratory

Prior to shipment, ~~Idaho~~ National Laboratory (INL) and Idaho Division of Environmental Quality shall be notified of any pending shipments of waste should DOE ship MLLW to INL. 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 ~~the~~ 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 30 working days after receipt of shipment of treatment residuals or newly-generated waste streams from INL.

Shipments of MLLW to planned facilities (not yet existing) will occur only after treatment and schedules are approved by ~~the~~ DOE, ~~the~~ Idaho Field Office 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

If Oak Ridge Reservation may not dispose of mixed-waste residues or new waste streams generated from offsite 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 30 working days after receipt of shipment of treatment residuals or newly-generated waste streams from [the](#) Oak Ridge Reservation.

## 2.4 Requirements Pertaining to Radionuclide Separation

The FFCA sets additional requirements in cases where DOE intends to conduct radionuclide separation of mixed waste. Should DOE determine to do radionuclide separation of such mixed waste, DOE will schedule specific compliance dates based on category activities identified in Table 2.4-1. "Radionuclide separation" shall mean segregating the radioactive portion of the mixed waste from the hazardous portion of the mixed waste.

Table 2.4-1 Activities for Radionuclide Separation

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 an NMED permit application.

## 2.5 Plans Related to Other Mixed Waste Activities

Activities other than the types of activities specifically called for in the FFCA as requiring schedules are described in this STP. Some of these activities may be associated with schedules that may contain compliance dates related to treatment of DOE's mixed waste.

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 FFCO. 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 FFCO.

DOE will notify ~~the~~ NMED when offsite 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 offsite 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 onsite or offsite 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 offsite for treatment. Any and all requirements by the recycling facility and all state, federal, 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 offsite noncommercial recycling facility. Notification should be made if possible when DOE is first considering such an option to allow ~~the~~ NMED and the state to address any state issues or concerns with other states. The NMED Project Manager shall approve in writing the proposed offsite noncommercial 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 45 working days of receipt of waste at the recycling facility. Activities for mixed waste to be recycled are identified in Table 2.6-1.

Table 2.6-1 Requirements for Recycling

- |  |
|--|
| <ul style="list-style-type: none"><li>A. Meet all regulatory requirements for recycling/re-use.</li><li>B. Provide documentation to <del>the</del> NMED that waste has been received within 45 working days of receipt of waste at the recycling facility.</li></ul> |
|--|

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 offsite for treatment. DOE will submit a notification letter to ~~the~~ NMED within 45 days, in place of documentation, that waste was received at a recycling facility.

### 2.7 Onsite Radiological Decontamination

DOE will pursue onsite 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 CP 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 2.7-1.

Table 2.7-1 Activities for Radiological Decontamination

- |   |
|---|
| <ul style="list-style-type: none"><li>A. Meet all DOE requirements for radiological decontamination.</li><li>B. Provide documentation to <del>the</del> NMED that waste has been received within 45 working days of receipt of waste at the recycling facility; or</li><li>C. Propose waste for deletion in accordance with Section IX of the FFCO.</li></ul> |
|---|

### 3.0 MIXED LOW-LEVEL WASTE STREAMS

This section presents the preferred options to treat MLLW at LANL. All preferred options not described below must be approved by ~~the~~ NMED in accordance with the revision process pursuant to the FFCO.

The original October 4, 1995, STP inventory in each MLLW treatability group ~~has been~~ was modified through the revision process in the FFCO. The tables in the STP Background (Part I) Appendices A–M of the FY09 STP Annual Update provide a comprehensive summary of changes to the CP covered waste inventories (additions, deletions, and shifts of waste between treatability groups) occurring as of the date of that revision. In Part III, 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 subsections of this section, 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 were assigned Activities and Compliance Dates unique to that subgroup, those subgroups are detailed in the text. Activities and Compliance Dates that have been were met in previous years are not shown in this document.

### 3.1 Mixed Waste Streams

The following subsections summarize MLLW treatability groups.

#### 3.1.1 IPA Wastes and Scintillation Fluids

Table 3.1.1-1 Treatability Groups for IPA Wastes and Scintillation Fluids

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
IPA Wastes	LA-W901	D001, D009, F002, F003, F005	0.00
Scintillation Fluids	LA-W902	D001, F003, F005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** The waste will be treated at an offsite facility that combusts organic liquid waste.

#### 3.1.2 Lead Blankets, Soil with Heavy Metals, Environmental Restoration (ER) Soils

Table 3.1.2-1 Treatability Groups for Lead Blankets, Soil with Heavy Metals, ER Soils

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** The waste will be treated at an offsite facility that stabilizes or macroencapsulates wastes.

#### 3.1.3 Aqueous Organic Liquids

Table 3.1.3-1 Treatability Groups for Aqueous Organic Liquids

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.1.3-2 Additional Treatability Groups for Aqueous Organic Liquids

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Aqueous Organic Liquids	LA-W906-6 LA-W906-9 LA-W906-10 LA-W906-15	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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.4 Organic-Contaminated Combustible Solids

Table 3.1.4-1 Treatability Groups for Organic-Contaminated Combustible Solids

Treatability Group	MWIR* Waste ID	RCRA codes	Net Volume (m <sup>3</sup> )
Organic-Contaminated Combustible Solids	LA-W911	D001, D004, D008, D009, F001, F002, F003, F005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.1.4-2 Treatability Groups for Organic-Contaminated Noncombustible Solids

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

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

Table 3.1.5-1 Treatability Groups for Combustible Lead, Activated or Inseparable Lead, and Noncombustible Debris

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Combustible Debris	LA-W912	D001, D002, D003, D005, D006, D007, D008, D009, D011, D035, F001, F002, F003, F005	0.00
Activated Or Inseparable Lead	LA-W921	D008	0.00
Noncombustible Debris	LA-W922 LA-W922-17 LA-W922-22 LA-W922-23 LA-W922-24 LA-W922-25	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

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

Table 3.1.6-1 Treatability Groups for Aqueous Wastes with Heavy Metals, Corrosive Solutions, Aqueous Cyanides, Nitrates, Chromates, and Arsenates

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.7 Water-Reactive Metal

Table 3.1.7-1 Treatability Groups for Water-Reactive Metal

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Water-Reactive Metal	LA-W916	D001, D003, D004, D005, D007, D008, D010, D011	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.8 Compressed Gases Requiring Scrubbing

Table 3.1.8-1 Treatability Groups for Compressed Gases Requiring Scrubbing

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Compressed Gases Requiring Scrubbing	LA-W917 LA-W917-21 LA-W917-24 LA-W917-25 <del>LA-W917-26</del>	D001, D002, D003, D008, D009, P056	<del>0.833</del> 1.248
<b>Totals</b>			<b>1.2480.833</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.1.8-2 Activities and Compliance Dates for Compressed Gases Requiring Scrubbing

Activity	Compliance Dates
A. Complete shipping of existing wastes to an offsite treatment facility or complete parallel option.	September 30, 2018
B. Provide documentation to the NMED that waste was received at offsite 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

Table 3.1.9-1 Treatability Groups for Compressed Gases Requiring Oxidation

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Compressed Gases Requiring Oxidation	LA-W918	D001, U226	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.10 Elemental Mercury

Table 3.1.10-1 Treatability Groups for Elemental Mercury

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Elemental Mercury	LA-W920 LA-W920-16	D006, D009, F005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.1.11 Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, Polychlorinated Biphenyl (PCB) Wastes with RCRA Components, Liquid and Solid Oxidizers

Table 3.1.11-1 Treatability Groups for Halogenated Organic Liquids, Nonhalogenated Organic Liquids, Bulk Oils, PCB Wastes with RCRA Components

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
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	0.00
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	0.00
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	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.1.11-2 Additional Treatability Groups

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Liquid And Solid Oxidizers	LA-W923	D001, D003, D005	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

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

Table 3.2-1 Treatability Groups for Waste Requiring Characterization or Assessment

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Lead Wastes – to be determined (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		0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.2-2 Additional Wastes Requiring Characterization or Assessment

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
Lead Wastes - TBD	LA-W924-15	D003, D008	0.00
	LA-W924-16		0.00
	LA-W924-17		0.00
Mercury Wastes – TBD	LA-W925-4	D003, D007, D008, D009 F001, F002, F005	0.00
	LA-W925-5		
	LA-W925-6		
	LA-W925-15		
	LA-W925-16		
	LA-W925-17		
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	0.00
	LA-W933-17		
High Activity Waste	LA-W934	D001, D003, D008, D009	1.301
	LA-W934-16		
	LA-W934-19		
	LA-W934-20		
	LA-W934-24		
<b>Totals</b>			<b>1.301</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.2-3 Activities and Compliance Dates for Wastes Requiring Characterization or Assessment

Activity	Compliance Dates
<del>A.</del> Complete shipping of wastes to an offsite treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option.	June 30, 2018
<del>B.</del> Provide documentation to <del>the</del> NMED that waste was received at offsite facility or provide notification of parallel option.	Within 45 days of receipt of waste at offsite facility or within 45 days after completion of parallel option.

LANL's inventory of *High Activity Waste* consists of five containers with a combined volume of 1.301 m<sup>3</sup>. Assuming that shipping issues can be resolved, LANL expects to meet the June 30, 2018, milestone for the remaining *High Activity Waste*.

DOE/LANS continues to diligently pursue all possible options to ship the waste offsite prior to the milestone for the remaining five containers (tritium traps with mercury contamination and the mole sieves and squib assemblies with very high tritium). ~~Since the submission of the FY13 Annual Update, DOE/LANS is still pursuing the 10-160B cask as an alternate shipping method. However, since confirming the receiving facility, DOE/LANS no longer needs to open and characterize the waste onsite. The contract DOE/LANS has put into place a contract with Perma-Fix that would will allow for LANL to ship the High Activity Waste offsite for treatment and disposal. Perma-Fix has been confirmed as the receiving commercial facility. This contract requires complete characterization, packaging, transportation, treatment and disposal for containers of the high activity waste. Perma-Fix has completed the characterization (evaluation including calculations and certification statement identifying all hazardous and radioactive characteristics of the waste); the transportation plan that addresses all aspects of the Department of Transportation requirements to compliantly package and ship the waste; and the Nuclear Regulatory Commission permit with the State of Tennessee for a tritium project-specific license required to handle the curie content in the High Activity Waste has been completed by Perma-Fix. The Contractor Perma-Fix is in the process of preparing 1) a Certificate of Compliance modifications for the selected 10-160B cask for transport to the commercial treatment facility. The Type B Cask (TRU PAC II) became unavailable for use so the 10-160B cask is being pursued as the shipping method for this high activity waste. Transportation Plan that will address all aspects of Department of Transportation requirements to compliantly package and ship the waste; 2) Certificate of Compliance modifications for the selected Type B Cask (TRU Pac II) for transport to the commercial treatment facility; and 3) the Nuclear Regulatory Commission permit with the State of Tennessee for a tritium project specific license required to handle the curie content in the High Activity Waste.~~

### 3.3 Plans for Other Types of Activities

The following subsection summarizes plans for other types of activities.

#### 3.3.1 Lead Decontamination

Table 3.3.1-1 Treatability Groups for Lead Decontamination

Treatability Group	MWIR* Waste ID	First Category	Second Category	Totals
		Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )
Lead For Surface Decontamination	LA-W930-0	0.00	0.00	0.00
	LA-W930-5			

<b>Totals</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
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\*MWIR is Mixed Waste Inventory Report

**Treatment:** Any lead not acceptable for onsite or offsite lead decontamination, and any lead unsuccessfully decontaminated, will be designated in the following two categories: 1) for treatment and disposal at an offsite facility or 2) for recycle through an offsite 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.

Table 3.3.1-2 Additional Wastes for Lead Decontamination

Treatability Group	MWIR* Waste ID	First Category	Second Category	Totals
		Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )	Net Volume (m <sup>3</sup> )
Lead For Surface Decontamination	LA-W930-6	0.00	0.00	0.00
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.3.2 Sorting, Surveying, and Decontamination

Table 3.3.2-1 Treatability Groups for Sorting, Surveying, and Decontamination

Treatability Group	MWIR* Waste ID	Net Volume (m <sup>3</sup> )
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
<b>Totals</b>		<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

Table 3.3.2-2 Additional Wastes for Sorting, Surveying, and Decontamination

Treatability Group	MWIR* Waste ID	Net Volume (m <sup>3</sup> )
Nonradioactive or Suspect Waste Items	LA-W929-5	0.00
<b>Totals</b>		<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

### 3.3.3 Lead Requiring Sorting

Table 3.3.3-1 Treatability Groups for Lead Requiring Sorting

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m3)
Lead Requiring Sorting	LA-W931	D008	0.00
<b>Totals</b>			<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** Wastes in this treatability group 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~~ were packaged in the same drum.

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

### 3.3.4 10–100 nCi/g Waste

Table 3.3.4-1 Treatability Groups for 10–100 nCi/g Waste

Treatability Group	MWIR* Waste ID	RCRA Codes	Net Volume (m <sup>3</sup> )
10–100 nCi/g	LA-W935 LA-W935-19 LA-W935-20 LA-W935-21 LA-W935-22 LA-W935-23 LA-W935-24 LA-W935-25 <del>LA-W935-26</del>	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	<del>33.14041.545</del>
<b>Totals</b>			<del>33.14041.545</del>

\*MWIR is Mixed Waste Inventory Report

**Treatment:** Wastes in this treatability group ~~are consist of~~ a population of legacy drums packaged and managed as MTRU (>100 nCi/g) but, after assay, ~~are were~~ determined to be MLLW (<100 nCi/g). 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 low-level waste population, and drums are relabeled appropriately. The drum is reclassified from TRU to MLLW in the database. ~~TRU programs will be notified of the drums reclassified from TRU to MLLW for evaluation of possible other drums based on waste stream.~~

~~The drum numbers will be submitted to Production Control for retrieval and staging as MLLW prior to offsite disposal. The MLLW drums are prepared for treatment and disposal to an offsite facility using CCP-Acceptable Knowledge documentation and onsite and offsite profiles generated for debris or sludge drums.~~

Table 3.3.4-2 Activities and Compliance Dates for 10–100 nCi/g Waste

Activity	Compliance Dates
A. Complete radiological characterization.	September 1, 2018
B. Complete shipment of existing waste to offsite facility for treatment, or complete parallel options.	September 30, 2018
C. Provide documentation to <del>the</del> NMED that waste was received at offsite 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.

~~A substantial inventory of LA-W935 waste that resulted from reclassifying MTRU waste between FY07 and FY12 (a total of 201.4007 m<sup>3</sup>) was shipped offsite, completing the proposed FY12 Annual Update milestone of April 16, 2014. As much waste as possible that was reclassified in FY13 and FY14 was~~

~~shipped offsite during FY14.~~ These estimated waste volumes will be subtracted from the MTRU STP inventory and added to the MLLW STP inventory as the waste is reclassified as MLLW. However, because of the repackaging process, the apparent volume of waste will reflect the number of additional containers needed to repackage the waste into compliant configurations for transportation and disposal. The Ongoing repackaging process for waste to be accepted at offsite treatment and disposal facilities will continue to produce 10–100 nCi/g Waste (LA-W935); therefore, DOE/LANS will seek updates to milestone(s) annually.

### 3.4 Management of “Missing” Items

Table 3.4-1 Waste Category for “Missing Waste”

Category	MWIR* Waste ID	Net Volume (m <sup>3</sup> )
Missing/Nonexistent/To be verified (TBV)	None	0.00
<b>Totals</b>		<b>0.00</b>

\*MWIR is Mixed Waste Inventory Report

**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 expected containers, according to the LANL data files for the waste item. In some instances, such items cannot be verified as having been received in storage at LANL, and follow-up investigations of the record files reveal that although they were included in the original STP inventory, the waste items were never generated.

Some waste items were determined not to exist after visual inspection and document review. When DOE/LANS determines 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 verified the absence of all “Missing/nonexistent/TBV” items container by container as each STP waste item was being sampled, repackaged, or otherwise prepared for onsite or offsite treatment. The final verification of all “Missing/nonexistent/TBV” items was completed by 2004. All missing or nonexistent items ~~have been~~ were deleted from the STP. All remaining MLLW items in the original STP inventory ~~have been~~ were treated and disposed of.

If, at any time, any of these items is discovered in the inventory, the NMED would be notified and approval requested for assignment of the rediscovered items to the appropriate treatability group. If necessary, they would be assigned new Activities and Compliance Dates in accordance with the terms of the FFCO.

### 4.0 MIXED TRANSURANIC WASTE

**Treatment Group(s):** Assorted MTRU Waste

**Offsite Disposal:** MTRU waste at LANL will be shipped for disposal at WIPP, located in Carlsbad, New Mexico.

**Disposal:** Waste volumes listed in Table 4.0-1 constitute the remaining original population of the Framework Agreement of “non-cemented above-ground EM Legacy TRU” and “above-ground cemented EM Legacy TRU” that is MTRU waste only. Volume adjustments noted below are due to corrections of

database entries, treatability group, EPA codes, overpacks removed/added, containers repacked and shipped/hold for waste items identified as the non-cemented and cemented above-ground EM Legacy TRU for MTRU STP waste.

Table 4.0-1 Treatability Groups for The Framework Agreement MTRU Waste (remaining original containers)

Treatability Group	CP Section	FY13 Volume (m <sup>3</sup> )	FY14 Administrative Adjustments	Shipped-to-WIPP (approved to removed)	FY14 Shipped (on hold) <sup>2</sup>	FY14 Volume (m <sup>3</sup> )
Cemented Sludge	4.0	0.000	0.416	-0.416	0.000	0.000
Combustible—Noncombustible Waste	4.0	290.383	-216.621	-21.728	30.736	52.034
Combustible Waste	4.0	0.208	0.530	-0.530	0.000	0.208
Metallic Waste	4.0	19.258	-19.050	-0.000	0.208	0.208
Noncombustible Waste	4.0	1.248	2.838	-2.838	1.040	1.248
Solidified Inorganic and Organic Waste	4.0	29.172	-8.440	-0.832	9.588	19.900
<b>Totals</b>		<b>340.269</b>				<b>73.598</b>
	CP Section	FY14 Shipped (on hold) <sup>1</sup>	FY14 Volume (m <sup>3</sup> )	FY15 Administrative Adjustments	FY15 Volume (m <sup>3</sup> )	
Cemented Sludge	4.0	0.000	0.000	0.000	0.000	
Combustible – Noncombustible Waste	4.0	30.736	21.298	11.640	63.674	
Combustible Waste	4.0	0.000	0.208	0.000	0.208	
Metallic Waste	4.0	0.208	0.000	0.000	0.208	
Noncombustible Waste	4.0	1.040	0.208	0.000	1.248	
Solidified Inorganic and Organic Waste	4.0	9.588	10.312	0.000	19.900	
<b>Totals</b>			<b>73.598<sup>2</sup></b>		<b>85.238</b>	

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<sup>1</sup>This waste was shipped offsite to WIPP or a WCS facility but has not yet been disposed. Therefore, the volume is not to be subtracted from the STP inventory. Removal of waste from the STP inventory is on hold until NMED approval is received.  
<sup>2</sup>Total volume is the sum of both columns: FY14 Shipped (on hold) and FY14 Volumes.

**Covered MTRU Inventory at TA 55:** The FY14 reported waste volume for STP-covered MTRU inventory at TA 55 and CMR is 42.357 m<sup>3</sup>. In FY14, approximately 20 m<sup>3</sup> of the 42 m<sup>3</sup> of TA 55's STP waste is associated with the Confinement Vessel Disposition (CVD) Project (formerly referred to as the Bolas Grande Project), that started in the summer of FY14. This is still a relatively new process that has never been attempted before and because of the uncertainty of how long it will take to process each vessel, the project ending date is expected to be September 30, 2017. The remainder of the covered MTRU waste inventory at TA 55 consists of radioactive-free liquids, requiring management at the Waste Characterization, Reduction, and Repacking Facility. TA 55 PF 4 is under a safety pause that restricted the movement of MTRU waste within and out of the facility; and TA 54 is up-dating its Safety Basis documents that govern Material at Risk and TA 54's Composite Source Term Limits (amount of

combustible waste that can be stored at TA-54). This up-dating process reduced the receipt of TA-55 TRU and MTRU waste at TA-54.

Table 4.0-2 Activities and Compliance Dates for MTRU Inventory at TA-55 and CMR from Table E-2

Activity	Compliance Dates
A. Complete transfer of existing waste (excluding Metallic Waste) to TA-54 facility	September 30, 2017
C. Complete transfer of Metallic Waste to CMR for material retrieval	<del>November 30, 2018</del> September 30, 2017

**Transfer of Covered MTRU Inventory at TA-55:** The FY15/14 reported waste volume for STP-covered MTRU inventory at TA-55 and CMR is 45.84442.357 m<sup>3</sup>. In FY15/14, approximately 22.29 m<sup>3</sup> of the 36.42 m<sup>3</sup> of TA-55's STP waste at TA-55 is associated with the Confinement Vessel Disposition (CVD) Project (formerly referred to as the Bolas Grande Project), that started in the summer of FY 14. This is still a relatively new process that has never been attempted before and because of the uncertainty of how long it will take to process each vessel, the project ending date is expected to be A milestone extension request to November 30, 2018, is proposed as discussed in the Compliance Plan CP Update Part II, Section 5.0, September 30, 2017. The remainder of the covered MTRU waste inventory at TA-55 consists of radioactive-free liquids, requiring management at the Waste Characterization, Reduction, and Repacking Facility (WCRRF). WCRRF is currently not receiving waste until it has implemented corrective actions as directed by the Department of Energy DOE's Accident Investigation Board, including updating its Safety Basis documents. TA-55 PF-4 is under a safety pause that restricted the movement of MTRU waste within and out of the facility, and TA-54 is up-dating its Safety Basis documents that govern Material at Risk and TA-54's Composite Source Term Limits (amount of combustible waste that can be stored at TA-54). This up-dating process has temporarily stopped or significantly reduced the receipt of LANL-generated TRU and MTRU waste at TA-54. Therefore, newly-generated MTRU waste is primarily being stored at TA-55 until the TA-63 Transuranic TRU Waste Facility becomes operational. This up-dating process reduced the receipt of TA-55 TRU and MTRU waste at TA-54.

#### 4.1 Management of "Missing" Items

Table 4.1-2 Waste Category for "Missing Waste"

Category	Treatability Groups	Net Volume (m <sup>3</sup> )
Missing/Nonexistent/TBV	Cemented Sludge	0.00
	Combustible-Noncombustible Waste	0.000
	Combustible Waste	0.000
<b>Totals</b>		<b>0.000</b>

**Treatment:** During visual inspections in support of STP waste work-off, occasionally an item cannot be found, or it is not located in the expected containers, according to the LANL data files for the waste item. In some instances, such items cannot be verified as having been received in storage at LANL, and follow-up investigations of the record files reveal that although the items were included in the original STP inventory, the waste items were never generated.

Some items were determined not to exist after visual inspection and document review. When LANS determines that an STP-covered waste item does not exist, transfer of the item to the category called “Missing/nonexistent/TBV” is requested through this revision Annual Update.

- | If, at any time, any of these items is discovered in the inventory, ~~the~~ NMED would be notified and approval requested for assignment of the rediscovered items to the appropriate treatability group.

*Table 4.1-2 Waste Category for “Missing Waste” – Detail [Table Omitted]*

## **APPENDICES**

**APPENDIX A CURRENT YEAR MLLW INVENTORY DETAIL**

Table A-1 FY154 MLLW Inventory Detailed Update by Treatability Group

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.1.1	LA-W901 <i>IPA Wastes</i>	0	0		0	0
3.1.1	LA-W902 <i>Scintillation Fluids</i>	0	0		0	0
3.1.2	LA-W903 <i>Lead Blankets</i>	0	0		0	0
3.1.2	LA-W904 <i>Soil with Heavy Metals</i>	0	0		0	0
3.1.2	LA-W905 <i>ER Soils</i>	0	0		0	0
3.1.3	LA-W906 <i>Aqueous Organic Liquids</i>	0	0		0	0
3.1.4	LA-W911 <i>Organic-Contaminated Combustible Solids</i>	0	0		0	0
3.1.4	LA-W919 <i>Organic-Contaminated Noncombustible Solids</i>	0	0		0	0
3.1.5	LA-W912 <i>Combustible Debris</i>	0	0		0	0
3.1.5	LA-W921 <i>Activated or Inseparable Lead</i>	0	0		0	0
3.1.5	LA-W922 <i>Noncombustible Debris</i>	0.624	029.375	Administrative Adjustment	0	0
			0-29.999	Shipped offsite for treatment/disposal		
3.1.6	LA-W913 <i>Aqueous Wastes with Heavy Metals</i>	0	0		0	0
3.1.6	LA-W914 <i>Corrosive Solutions</i>	0	0		0	0
3.1.6	LA-W915 <i>Aqueous Cyanides, Nitrates, Chromates, and Arsenates</i>	0	0		0	0
3.1.7	LA-W916 <i>Water-Reactive Wastes</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.1.8	LA-W917 <sup>4</sup> <i>Compressed Gases Requiring Scrubbing</i>	0.8331-456	0.4150-624	Administrative Adjustment	1.2480-833	0
			-1.249	Administrative Adjustment		
			0-1.872	Shipped offsite for treatment/disposal		
3.1.9	LA-W918 <i>Compressed Gases Requiring Oxidation</i>	0	0		0	0
3.1.10	LA-W920 <i>Elemental Mercury</i>	0	0		0	0
3.1.11	LA-W907 <i>Halogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W909 <i>Bulk Oils</i>	0	0		0	0
3.1.11	LA-W910 <i>PCB Wastes with RCRA Components</i>	0	0		0	0
3.1.11	LA-W923 <i>Liquid and Solid Oxidizers</i>	0	0		0	0
3.2	LA-W924 <i>Lead Wastes – TBD</i>	0	0		0	0
3.2	LA-W925 <i>Mercury Wastes – TBD</i>	0	0		0	0
3.2	LA-W926 <i>Compressed Gases – TBD</i>	0	0		0	0
3.2	LA-W927 <i>Biochemical Laboratory Wastes</i>	0	0		0	0
3.2	LA-W928 <i>Dewatered Treatment Sludge</i>	0	0		0	0
3.2	LA-W932 <i>Explosives</i>	0	0		0	0
3.2	LA-W933 <i>Labpacks</i>	0	0		0	0
3.2	LA-W934 <i>High Activity Waste</i>	1.301	0	Shipped offsite for treatment/disposal	1.301	0
			0	Administrative Adjustment		
3.3.1	LA-W930 <i>Lead for Surface Decontamination</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15 – FY19 (m <sup>3</sup> )
3.3.2	LA-W929 <i>Nonradioactive or Suspect Waste Items to be Surveyed</i>	0	0		0	0
3.3.3	LA-W931 <i>Lead Requiring Sorting</i>	0	0		0	0
3.3.4	LA-W935 <i>10–100 nCi/g Waste</i>	11,545,970.000	20,951,594.305	Administrative Adjustment	33,140,445.45	50
			0.644	New covered		
			0-676.76	Shipped offsite for treatment/disposal		
3.4	<i>Missing/ nonexistent/ TBV category</i>	0	0		0	N/A
<b>TOTALS</b>		<del>13,679,100.381</del>			<del>35,689,136.79</del>	

<sup>1</sup> CP is Compliance Plan; MWIR is Mixed Waste Inventory Report.

<sup>2</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>; ~~however, due to FY13 changes in the way that the MTRU are process (repackaged) into several different containers and are no longer equal to those added to the MLLW inventory of LA-W935.~~

<sup>3</sup> Shipment details are in Appendix B; Administrative adjustments are in Appendix C.

<sup>4</sup> Items prohibited from shipment to WIPP are removed from MTRU STP containers and consolidated; some are MLLW and are included in Table A-1 as LA-W917 waste; others are MTRU waste and are considered *Combustible-Noncombustible Waste* in Table E-1.

**APPENDIX B CURRENT YEAR MLLW SHIPMENT DETAIL**

Table B-1 MLLW Shipped Offsite for Treatment and Disposal in FY15<sup>1</sup>

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CP Section	MWIR* No.	Treatability Group	Manifest Number	Destination	Date Shipped	Date NMED Notified	Volume (m <sup>3</sup> )
3.1.8	LA-W917	Compressed Gases Requiring Scrubbing Waste	006640143FLE	PermaFix FL	6/19/2014	7/9/2014 (WM-DO-14-049)	0.416
			006640108FLE	PermaFix FL	5/19/2014	3/24/2015 (WM-DO-15-006)	1.456
<b>LA-W917 Total</b>							<b>01.872</b>
3.1.5	LA-W922	Noncombustible Debris	006639997FLE	PermaFix FL	2/27/2014	4/15/2014 (WM-DO-14-027)	0.416
			006640116FLE	PermaFix NW	5/19/2014	7/3/2014 (wm-do-14-046)	0.416
			006640140FLE	Waste Control Specialists-LLC	6/24/2014	8/7/2014 (WM-DO-14-051)	4.800
			006640141FLE	Waste Control Specialists-LLC	6/24/2014	8/7/2014 (WM-DO-14-051)	24.367
<b>LA-W922 Total</b>							<b>029.999</b>
3.3.4	LA-W935	10-100 nCi/g Waste	006639825FLE	Waste Control Specialists-LLC	11/20/2013	1/2/2014 (WM-DO-13-0092)	46.931
			006639830FLE	Waste Control Specialists-LLC	11/20/2013	1/2/2014 (WM-DO-13-0092)	39.999
			006639881FLE	Waste Control Specialists-LLC	12/4/2013	1/15/2014 (WM-DO-14-004)	2.560
			006639890FLE	Waste Control Specialists-LLC	12/4/2013	1/15/2014 (WM-DO-14-004)	29.227
			006639891FLE	Waste Control Specialists-LLC	12/4/2013	1/15/2014 (WM-DO-14-004)	14.494
			006639892FLE	Waste Control Specialists-LLC	12/4/2013	1/15/2014 (WM-DO-14-004)	19.322
			006639912FLE	Material & Energy Corporation	12/10/2013	1/23/2014 (WM-DO-14-015)	3.972
			006639904FLE	Waste Control Specialists-LLC	12/12/2013	1/23/2014 (WM-DO-14-015)	13.540
			006639906FLE	Waste Control Specialists-LLC	12/12/2013	1/23/2014 (WM-DO-14-015)	6.662
			006639922FLE	Waste Control Specialists-LLC	12/13/2013	1/23/2014 (WM-DO-14-015)	23.207
			006639882FLE	PermaFix NW	12/12/2013	1/23/2014 (WM-DO-14-015)	2.560
			006639903FLE	PermaFix NW	12/12/2013	1/23/2014 (WM-DO-14-015)	1.684

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CP Section	MWIR* No.	Treatability Group	Manifest Number	Destination	Date Shipped	Date NMED Notified	Volume (m <sup>3</sup> )
3.3.4	LA W935	10-100 nCi/g Waste	006639921FLE	Waste Control Specialists LLC	1/28/2014	2/28/2014 (WM-DO-14-019)	8.903
			006639945FLE	Waste Control Specialists LLC	1/21/2014	2/28/2014 (WM-DO-14-019)	6.058
			006639968FLE	Waste Control Specialists LLC	2/11/2014	2/28/2014 (WM-DO-14-019)	2.496
			006639969FLE	Waste Control Specialists LLC	2/11/2014	2/28/2014 (WM-DO-14-019)	3.314
			006639930FLE	Waste Control Specialists LLC	2/18/2014	4/2/2014 (WM-DO-14-021)	18.663
			006639988FLE	Waste Control Specialists LLC	2/18/2014	4/2/2014 (WM-DO-14-021)	1.900
			006639996FLE	Waste Control Specialists LLC	2/25/2014	4/2/2014 (WM-DO-14-021)	40.776
			006639998FLE	Waste Control Specialists LLC	3/11/2014	4/2/2014 (WM-DO-14-021)	54.198
			006640007FLE	Waste Control Specialists LLC	3/18/2014	4/15/2014 (WM-DO-14-026)	48.437
			006640010FLE	Waste Control Specialists LLC	3/18/2014	4/15/2014 (WM-DO-14-026)	11.091
			006640012FLE	Waste Control Specialists LLC	3/18/2014	4/15/2014 (WM-DO-14-026)	11.485
			006640013FLE	Waste Control Specialists LLC	3/18/2014	4/15/2014 (WM-DO-14-026)	6.100
			006640024FLE	Waste Control Specialists LLC	4/1/2014	4/15/2014 (WM-DO-14-026)	17.766
			006640028FLE	Waste Control Specialists LLC	4/1/2014	4/15/2014 (WM-DO-14-026)	13.573
			006640033FLE	Waste Control Specialists LLC	4/1/2014	4/15/2014 (WM-DO-14-026)	15.722
			006640034FLE	Waste Control Specialists LLC	4/1/2014	4/15/2014 (WM-DO-14-026)	28.455
			006639999FLE	Waste Control Specialists LLC	3/4/2014	4/16/2014 (WM-DO-14-028)	17.179
			006640051FLE	Waste Control Specialists LLC	4/8/2014	4/24/2014 (WM-DO-14-030)	10.328
			006640052FLE	Waste Control Specialists LLC	4/8/2014	4/24/2014 (WM-DO-14-030)	15.555
			006640050FLE	Waste Control Specialists LLC	4/8/2014	4/24/2014 (WM-DO-14-030)	32.103
			006640011FLE	Waste Control Specialists LLC	3/25/2014	5/9/2014 (WM-DO-14-037)	11.840
			006640022FLE	Waste Control Specialists LLC	3/25/2014	5/9/2014 (WM-DO-14-037)	7.646

CP Section	MWIR* No.	Treatability Group	Manifest Number	Destination	Date Shipped	Date NMED Notified	Volume (m <sup>3</sup> )
3.3.4	LA-W935	10-100 nCi/g Waste	006640023FLE	Waste Control Specialists LLC	3/25/2014	5/9/2014 (WM-DO-14-037)	32.353
			006640062FLE	PermaFix NW	4/15/2014	5/9/2014 (WM-DO-14-037)	3.120
			006640063FLE	Material & Energy Corporation	4/16/2014	5/9/2014 (WM-DO-14-037)	3.536
			006640067FLE	Material & Energy Corporation	4/16/2014	5/9/2014 (WM-DO-14-037)	0.208
			006640073FLE	PermaFix NW	4/23/2014	6/9/2014 (WM-DO-14-045)	9.500
			006640086FLE	Waste Control Specialists LLC	4/30/2014	6/9/2014 (WM-DO-14-045)	21.061
			006640088FLE	Waste Control Specialists LLC	4/30/2014	6/9/2014 (WM-DO-14-045)	4.560
			006640091FLE	Waste Control Specialists LLC	4/30/2014	6/9/2014 (WM-DO-14-045)	2.081
			006640092FLE	Waste Control Specialists LLC	4/30/2014	6/9/2014 (WM-DO-14-045)	6.554
			006640113FLE	PermaFix NW	5/19/2014	7/3/2014 (WM-DO-14-047)	6.022
			006640194FLE	PermaFix FL	7/29/2014	9/9/2014 (WM-DO-14-054)	0.019
<b>LA-W935 Total</b>							<b>0676.760</b>
<b>Grand Total</b>							<b>0708.631</b>

\*MWIR is Mixed Waste Inventory Report.

<sup>1</sup>DOE/LANS have not shipped MLLW STP covered waste during FY15.

**APPENDIX C CURRENT YEAR MLLW ADMINISTRATIVE ADJUSTMENTS**

Table C-1 Administrative Adjustments

CP Section	MWIR* Number	Administrative Adjustment	Volume (m <sup>3</sup> )
3.3.4	LA-W935	<del>Transferred from LA-W935 to LA-W917 as a result of treatability group reassignment</del> <del>Transferred into LA-W935 from TA-55</del>	<del>-0.2080-049</del>
		Removed as a result of reconciliation of inconsistencies in the current inventory	-2.549
		Added as a result of reconciliation of inconsistencies in the current inventory	42.964
		Transferred into LA-W935 from repackaging of TRU/MTRU STP Inventory	458.185
		Added/Transferred into LA-W935 from (RTR/real-time radiography) recharacterization process	19.4142-576
		Transferred into LA-W935 from reclassification of MTRU waste	4.2948-548
		Transferred into LA-W935 from reclassification of TRU waste	90.423
		Removed from LA-W935 as a result of not being STP covered waste. This waste was declared hazardous waste for reduced worker exposures (improve worker safety — as low as reasonably achievable) and efficiency of waste handling (putting this waste in the same transportainer with other STP waste)	-5.650
		Removed from LA-W935 as a result of reclassifying back to TRU/MTRU waste	-5.730
<b>Total Net Adjustments for LA-W935</b>			<b>20.951591-305</b>
3.1.8	LA-W917	Transferred from LA-W935 to into LA-W917 as a result of treatability group reassignment <del>from TRU/MTRU repackaging</del>	0.2084-665
		Volume changes due to addition or removal of packaging <del>Re-assayed to TRU MLLW waste</del>	0.207-0.416
<b>Total Net Adjustments for LA-W917</b>			<b>0.4154-249</b>
3.1.5	LA-W922	Transferred into LA-W922 from LLW	29.167
<b>Total Net Adjustments for LA-W922</b>			<b>29.167</b>
<b>Total Net Adjustments</b>			<b>21.366621-724</b>

\*MWIR is Mixed Waste Inventory Report

Table C-2 Administrative Adjustment – Detail

CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment			
3.3.4	LA-W935	10-100 nCi/g	Reassigned treatability group Reclassified/ Repackaged MTRU STP and TRU inventory to MLLW STP inventory	-0.2080.019			Transferred into LA-W91735 from TA-55 for prohibited items			
						W819835 W820785	-0.2080.019	Parent MTRU Container 10095775.0.019 m <sup>3</sup>		
		10-100 nCi/g	Removed as a result of reconciliation of inconsistencies in the current inventory Reclassified/ Repackaged MTRU STP and TRU inventory to MLLW STP inventory	= 2.54942.964				Removed/Added as a result of reconciliation wall-to-wall inventory and database inconsistencies in the current inventory		
						W796933	39.999			
						W797136	0.208	Volume included		
						C07194641	0.208			
						W729563	-2.549			
		10-100 nCi/g	Reclassified/ Repackaged MTRU STP and TRU inventory to MLLW STP inventory	458.185					Transferred into LA-W935 from combustible-noncombustible MTRU inventory as a result of repackaging process	
								W793121	1.900	Parent MTRU Container 3439, 5 m <sup>3</sup>
								W792816	1.900	Parent MTRU Container 3439, 5 m <sup>3</sup>
								W792817	1.900	Parent MTRU Container 3439, 5 m <sup>3</sup>
								W792840	1.900	Parent MTRU Container 53878, 2.56 m <sup>3</sup>
								W798410	6.662	Parent MTRU Container 62189, 10.95 m <sup>3</sup>
								W801243	28.455	Parent MTRU Container 62450, 26.63 m <sup>3</sup>
								W801331	15.722	Parent MTRU Container 8792118, 14.16 m <sup>3</sup>
								W798129	13.54	Parent MTRU Container 8792123, 14.16 m <sup>3</sup>
								W798967	40.776	Parent MTRU Container 8792124, 23.59 m <sup>3</sup>
			W797904	14.494	Parent MTRU Container 8792125, 15.09 m <sup>3</sup>					
			W797945	19.322	Parent MTRU Container 8794030, 32.26 m <sup>3</sup>					

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W800557	11.485	Parent MTRU Container S794036, 22.73 m <sup>3</sup>
					W800558	11.84	Parent MTRU Container S794036, 22.73 m <sup>3</sup>
					W793391	1.9	Parent MTRU Container S794037, 28.34 m <sup>3</sup>
3.3.4	LA-W935				W800161	48.437	Parent MTRU Container S794037, 28.34 m <sup>3</sup>
					W800787	11.091	Parent MTRU Container S794038, 16.3 m <sup>3</sup>
					W800803	6.1	Parent MTRU Container S794038, 16.3 m <sup>3</sup>
					W799643	17.179	Parent MTRU Container S794071, 27.187 m <sup>3</sup>
					W793384	1.9	Parent MTRU Container S794071, 27.187 m <sup>3</sup>
					W799353	54.198	Parent MTRU Container S794075, 35.75 m <sup>3</sup>
					W801244	13.573	Parent MTRU Container S794076, 13.594 m <sup>3</sup>
					W801094	32.353	Parent MTRU Container S794125, 33.84 m <sup>3</sup>
					W793400	1.9	Parent MTRU Container S794125, 33.84 m <sup>3</sup>
					W798053	18.663	Parent MTRU Container S794128, 23.11 m <sup>3</sup>
					W797833	29.227	Parent MTRU Container S803221, 30.84 m <sup>3</sup>
					W798628	23.207	Parent MTRU Container S803222, 8.82 m <sup>3</sup>
					W798581	8.903	Parent MTRU Container S813232, 11.894 m <sup>3</sup>
							Transferred into LA-W935 from metallic MTRU inventory as a result of repackaging process
					W801162	17.766	Parent MTRU Container S6066, 19.05 m <sup>3</sup>
							Transferred into LA-W935 from noncombustible MTRU inventory as a result of repackaging process
					W798825	0.322	Parent MTRU Container S6103, 0.322 m <sup>3</sup>
							Transferred into LA-W935 from solidified inorganic and organic MTRU inventory as a result of repackaging process
					W801972	0.322	Parent MTRU Container S870223, 0.416 m <sup>3</sup>

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W793049	0.208	Parent MTRU Container S803996, 0.208 m <sup>3</sup>
					W796350	0.208	Parent MTRU Container S814063, 0.208 m <sup>3</sup>
					W793052	0.208	Parent MTRU Container S833677, 0.208 m <sup>3</sup>
3.3.4	LA-W935				W793042	0.208	Parent MTRU Container S834144, 0.208 m <sup>3</sup>
					W798019	0.208	Parent MTRU Container S841588, 0.208 m <sup>3</sup>
					W793046	0.208	Parent MTRU Container S841594, 0.208 m <sup>3</sup>
		10-100 nCi/g	Reclassified/Repackaged MTRU STP and TRU inventory to MLLW STP inventory	19.4142-576			Transferred into LA-W935 from solidified inorganic and organic MTRU inventory as a result of <del>RTR</del> real-time radiography recharacterization process from TRU inventory
					W788184	0.322	
					W788255	0.322	
					W777004	0.322	
					W788228	0.322	
					W788533	0.322	
					W788584	0.322	
					W788907	0.322	
					W788939	0.322	
					W789169	0.322	
					W789458	0.322	
					W790811	0.322	
					W790872	0.322	
					W790905	0.322	
					W790908	0.322	
					W791681	0.322	
					W801418	0.322	
					W801477	0.322	
					W801478	0.322	
					W801504	0.322	
					W801522	0.322	
					W801540	0.322	
					W802047	0.322	
					W802087	0.322	
					W802120	0.322	
					W91592	0.322	
					W91817	0.322	
					W91884	0.322	

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					<a href="#">W92518</a>	<a href="#">0.322</a>	
					<a href="#">W92527</a>	<a href="#">0.322</a>	
					<a href="#">W92537</a>	<a href="#">0.322</a>	
					<a href="#">W92539</a>	<a href="#">0.322</a>	
					<a href="#">W92714</a>	<a href="#">0.322</a>	
					<a href="#">W92757</a>	<a href="#">0.322</a>	
					<a href="#">W92772</a>	<a href="#">0.322</a>	
					<a href="#">W92808</a>	<a href="#">0.322</a>	
					<a href="#">W93039</a>	<a href="#">0.322</a>	
					<a href="#">W93070</a>	<a href="#">0.322</a>	
					<a href="#">W93321</a>	<a href="#">0.322</a>	
					<a href="#">W93514</a>	<a href="#">0.322</a>	
					<a href="#">W93522</a>	<a href="#">0.322</a>	
					<a href="#">W93744</a>	<a href="#">0.322</a>	
					<a href="#">W93768</a>	<a href="#">0.322</a>	
					<a href="#">W93813</a>	<a href="#">0.322</a>	
					<a href="#">W93818</a>	<a href="#">0.322</a>	
					<a href="#">W93922</a>	<a href="#">0.322</a>	
					<a href="#">W93961</a>	<a href="#">0.322</a>	
					<a href="#">W94102</a>	<a href="#">0.322</a>	
					<a href="#">W94105</a>	<a href="#">0.322</a>	
					<a href="#">W798033</a>	<a href="#">0.322</a>	
					<a href="#">W798112</a>	<a href="#">0.322</a>	
					<a href="#">W798153</a>	<a href="#">0.322</a>	
					<a href="#">W798642</a>	<a href="#">0.322</a>	
					<a href="#">W799173</a>	<a href="#">0.208</a>	
					<a href="#">W799253</a>	<a href="#">0.208</a>	
					<a href="#">W802185</a>	<a href="#">0.322</a>	
					<a href="#">W802487</a>	<a href="#">0.322</a>	
					<a href="#">W802517</a>	<a href="#">0.322</a>	
					<a href="#">W816860</a>	<a href="#">0.322</a>	
					<a href="#">W816887</a>	<a href="#">0.322</a>	
					<a href="#">W819936</a>	<a href="#">0.322</a>	
					<a href="#">W91480</a>	<a href="#">0.322</a>	
					<a href="#">W93890</a>	<a href="#">0.322</a>	Repackaged from MTRU S860196, 0.208 m <sup>3</sup>
					<a href="#">W790710</a>	<a href="#">0.322</a>	Repackaged from MTRU S802765, 0.208 m <sup>3</sup>
					<a href="#">W791177</a>	<a href="#">0.322</a>	Repackaged from MTRU S834721, 0.208 m <sup>3</sup>
					<a href="#">W791350</a>	<a href="#">0.322</a>	Repackaged from MTRU S813357, 0.208 m <sup>3</sup>

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W93893	0.322	Repackaged from MTRU S861827, 0.208 m <sup>3</sup>
					W93939	0.322	Repackaged from MTRU S822945, 0.208 m <sup>3</sup>
					W93484	0.322	Repackaged from MTRU S813442, 0.208 m <sup>3</sup>
					W93567	0.322	Repackaged from MTRU S815139, 0.208 m <sup>3</sup>
		10-100 nCi/g	Reclassified/Repackaged MTRU STP and TRU inventory to MLLW STP inventory	1.8728.548			Less than 100 nCi/g; Derived from combustible-noncombustible MTRU inventory
					W87386W-793140	0.2080.644	Parent MTRU Container 8738669409, 0.322 m <sup>3</sup> & 68692, 0.2080.322 m <sup>3</sup>
					W88664W-53888	0.2082.56	Parent MTRU Container 8866453888, 0.2082.56 m <sup>3</sup>
					W85506W-60595	0.2080.322	Parent MTRU Container 8550660595, 0.2080.322 m <sup>3</sup>
					W88610W-21495	0.208	Parent MTRU Container 8861065382, 0.208 m <sup>3</sup>
					W88939W-20823	0.208	Parent MTRU Container 8893965620, 0.208 m <sup>3</sup>
					W88959W-22600	0.208	Parent MTRU Container 8895965649, 0.208 m <sup>3</sup>
					W816064W-20833	0.208	Parent MTRU Container S81606465653, 0.208 m <sup>3</sup>
					W846515W-22202	0.208	Parent MTRU Container S84651565789, 0.208 m <sup>3</sup>
3.3.4	LA-W935				W850048W-22948	0.208	Parent MTRU Container S85004865947, 0.208 m <sup>3</sup>
					W22771	0.208	Parent MTRU Container 66074, 0.208 m <sup>3</sup>
					W66083	0.208	Parent MTRU Container 66083, 0.208 m <sup>3</sup>
					W782593	0.208	Parent MTRU Container 86229, 0.208 m <sup>3</sup>
					W780908	0.208	Parent MTRU Container 86330, 0.208 m <sup>3</sup>
					W86840	0.208	Parent MTRU Container 86840, 0.208 m <sup>3</sup>
					W784722	0.208	Parent MTRU Container 87171, 0.208 m <sup>3</sup>
					W785495	0.208	Parent MTRU Container 87275, 0.322 m <sup>3</sup>
					W784268	0.208	Parent MTRU Container 88464, 0.208 m <sup>3</sup>
					W78542	0.208	Parent MTRU Container 88486, 0.208 m <sup>3</sup>

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W784265	0.208	Parent MTRU Container S8601, 0.208 m <sup>3</sup>
					W784311	0.208	Parent MTRU Container S8666, 0.208 m <sup>3</sup>
					W789710	0.208	Parent MTRU Container 91804, 1.9 m <sup>3</sup>
					W773037	0.416	Parent MTRU Container S821866, 0.416 m <sup>3</sup>
				2.422			Less than 100 nCi/g; Derived from Solidified Inorganic and Organic cemented sludge MTRU inventory
					W834290 W748153	0.3220-208	Parent MTRU Container S834290S834124, 0.3220-208 m <sup>3</sup>
					W841376 W766258	0.208	Parent MTRU Container S841376S850595, 0.208 m <sup>3</sup>
					W841467 W755795	0.208	Parent MTRU Container S841467S870647, 0.208 m <sup>3</sup>
					W850026	0.208	Parent MTRU Container S850026, 0.208 m <sup>3</sup> ; Less than 100 nCi/g; Derived from noncombustible MTRU inventory
					W850576 W760768	0.208	Parent MTRU Container S850576S830749, 0.208 m <sup>3</sup>
					W860218	0.208	Parent MTRU Container S860218, 0.208 m <sup>3</sup>
					W880983	0.208	Parent MTRU Container S880983, 0.208 m <sup>3</sup>
					W881006	0.322	Parent MTRU Container S881006, 0.322 m <sup>3</sup>
					W881011	0.208	Parent MTRU Container S881011, 0.208 m <sup>3</sup>
					W893323	0.322	Parent MTRU Container S893323, 0.322 m <sup>3</sup>
		10-100 nCi/g	Reclassified/Repack aged MTRU STP and TRU inventory to MLLW STP inventory	90.423			Less than 100 nCi/g; Derived from TRU inventory
					W57984	0.208	
					W61852	0.208	
					W797204	0.322	
3.3.4	LA-W935				W797953	0.322	
					W798794	0.322	
					L12226561	0.322	
					W799584	0.322	
					W757586	0.322	

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W748685	0.208	
					W750224	0.322	
					W753340	0.322	
					W751268	0.322	
					W757754	0.322	
					W756454	0.322	
					W751605	0.322	
					W747639	0.322	
					W747719	0.208	
					W749149	0.322	
					W756853	0.322	
					W750293	0.416	
					W755853	0.322	
					W753023	0.322	
					W754606	0.322	
					W754979	0.208	
					W750689	0.208	
					W750370	0.208	
					W756866	0.208	
					W749993	0.208	
					W776678	0.208	
					W766409	0.208	
					W789344	0.208	
					W765123	0.208	
					W776584	0.208	
					W763305	0.208	
					W772237	0.208	
					W759859	0.208	
					W771284	0.208	
					W772174	0.208	
					W762503	0.208	
					W772544	0.322	
					W773044	0.322	
					W760345	0.322	
					W759973	0.322	
					W759622	0.322	
3.3.4	LA-W935				W776406	0.322	
					W758917	0.322	
					W764642	0.322	
					W759067	0.322	
					W801650	32.103	

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					W799923	7.646	
					W13995	0.208	
					W21309	0.208	
					W782169	0.208	
					W760466	0.208	
					W14233	0.208	
					W756715	0.208	
					L05179877	21.061	
					L05179878	4.56	
					L05180415	2.081	
					W801888	6.554	
					W792852	1.9	
		10-100 nCi/g	Reclassified/Repack aged MTRU-STP and TRU inventory to MLLW-STP inventory	-5.650			Removed from LA-W935 as a result of not being STP covered waste. This waste was declared hazardous waste for reduced worker exposures and efficiency of waste handling
					L12226676	-3.750	
					L12226738	-1.9	
		10-100 nCi/g	Reclassified/Repack aged MLLW-STP inventory to TRU and MTRU-STP inventory	-5.730			Removed from LA-W935 as a result of reclassifying back to combustible noncombustible MTRU inventory
					C07194649	-0.208	Parent MTRU Container S860214, 0.208 m <sup>3</sup>
					C08196360	-0.208	Parent MTRU Container S824352, 0.208 m <sup>3</sup>
					C09207712	-0.208	Parent MTRU Container S860220, 0.208 m <sup>3</sup>
					C09207715	-0.208	Parent MTRU Container S860340, 0.208 m <sup>3</sup>
					C10211008	-0.208	Parent MTRU Container S816064, 0.208 m <sup>3</sup>
					C10211021	-0.208	Parent MTRU Container S841090, 0.208 m <sup>3</sup>
					C10211030	-0.208	Parent MTRU Container S846515, 0.208 m <sup>3</sup>
					C10211032	-0.208	Parent MTRU Container S850048, 0.208 m <sup>3</sup>
3.3.4	LA-W935				C10211041	-0.208	Parent MTRU Container S860206, 0.208 m <sup>3</sup>
					C10211042	-0.208	Parent MTRU Container S860207, 0.208 m <sup>3</sup>
					C10211055	-0.208	Parent MTRU Container S880973, 0.208 m <sup>3</sup>

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
					C10211056	-0.208	Parent MTRU Container S880976, 0.208 m <sup>3</sup>
					C10211370	-0.208	Parent MTRU Container S860304, 0.208 m <sup>3</sup>
					C10211674	-0.208	Parent MTRU Container 52370, 0.208 m <sup>3</sup>
							Removed from LA-W935 as a result of reclassifying back to combustible MTRU inventory
					C09207693	-0.208	Parent MTRU Container 55719, 0.208 m <sup>3</sup>
					C10211362	-0.208	Parent MTRU Container 55092, 0.208 m <sup>3</sup>
					C10211363	-0.208	Parent MTRU Container 55736, 0.208 m <sup>3</sup>
							Removed from LA-W935 as a result of reclassifying back to solidified inorganic and organic MTRU inventory
					C10211000	-0.322	Parent MTRU Container S800683, 0.322 m <sup>3</sup>
					C10211001	-0.208	Parent MTRU Container S803810, 0.208 m <sup>3</sup>
							Removed from LA-W935 as a result of reclassifying back to TRU waste
					C08200663	-0.208	Parent TRU Container
					C08200664	-0.208	Parent TRU Container
					C09201754	-0.208	Parent TRU Container
					C09207694	-0.208	Parent TRU Container
					C07207695	-0.208	Parent TRU Container
					C09207700	-0.208	Parent TRU Container
					C09207701	-0.208	Parent TRU Container
					C10211153	-0.208	Parent TRU Container
3.1.8	LA-W917	Compressed Gases Requiring Scrubbing Waste	Reassigned treatability group	0.2081.665			Transferred into LA-W917 from LA-W935 for prohibited items
	Repackaged MTRU STP and TRU inventory to MLLW STP inventory					Transferred into LA-W917 from combustible noncombustible MTRU inventory as a result of repackaging process	
					W819835	0.2080.004	Parent MTRU Containers
					W801216		S794076, 13.594 m <sup>3</sup>
					W801210	0.208	Parent MTRU Container S824498, 0.208 m <sup>3</sup>
			Repackaged MLLW STP inventory	0.207			Volume change due to repackaged item into 55-gallon container
3.1.8	LA-W917				W728258	0.2078	Parent MTRU Container
					W799653		65201, 0.208 m <sup>3</sup>

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CP Section	MWIR*	Treatability Group	Type of Adjustment	Cumulative Volume Adjustment (m <sup>3</sup> )	Item or Container Number	MLLW Container Volume (m <sup>3</sup> )	Reason for Administrative Adjustment
							Transferred into LA W917 from solidified Inorganic and Organic MTRU inventory as a result of repackaging process
					W793056	0.208	Parent MTRU Container S834064, 0.208 m <sup>3</sup>
					W793135	0.208	Parent MTRU Container S821620, 0.208 m <sup>3</sup>
					W802320	0.208	Parent MTRU Container S821620, 0.208 m <sup>3</sup>
							Transferred into LA W917 from TRU inventory as a result of repackaging process
					W800054	0.208	Parent TRU Container
					W801570	0.208	Parent TRU Container
					W800746	0.208	Parent TRU Container
		Compressed Gases Requiring Scrubbing Waste	Reclassified/ Repackaged MLLW STP inventory to TRU and MTRU STP inventory	-0.416			Removed from LA W917 as a result of reclassifying back to TRU/MTRU waste
					65216	-0.208	
					65211	-0.208	
3.1.5	LA-W922	Non-combustible Debris	Reclassified/ Repackaged LLW inventory to MLLW STP inventory	29.167			Transferred into LA W922 as a result of reclassifying LLW (glovebox) inventory
					W499644	4.8	
					W801575	24.367	
<b>Subtotal MLLW Volume</b>						<b>21.366621.72</b>	<b>↓</b>

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\*MWIR is Mixed Waste Inventory Report

**APPENDIX D PREVIOUS YEAR MLLW INVENTORY DETAIL**

Table D-1 FY143 MLLW Inventory1 Detailed Update by Treatability Group

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15- FY19 (m <sup>3</sup> )
3.1.1	LA-W901 <i>IPA Wastes</i>	0	0	-	0	0
3.1.1	LA-W902 <i>Scintillation Fluids</i>	0	0	-	0	0
3.1.2	LA-W903 <i>Lead Blankets</i>	0	0	-	0	0
3.1.2	LA-W904 <i>Soil with Heavy Metals</i>	0	0	-	0	0
3.1.2	LA-W905 <i>ER Soils</i>	0	0	-	0	0
3.1.3	LA-W906 <i>Aqueous Organic Liquids</i>	0	0	-	0	0
3.1.4	LA-W911 <i>Organic-Contaminated Combustible Solids</i>	0	0	-	0	0
3.1.4	LA-W919 <i>Organic-Contaminated Noncombustible Solids</i>	0	0	-	0	0
3.1.5	LA-W912 <i>Combustible Debris</i>	0	0	-	0	0
3.1.5	LA-W921 <i>Activated or Inseparable Lead</i>	0	0	-	0	0
3.1.5	LA-W922 <i>Noncombustible Debris</i>	0.624	29.375 -29.999	Administrative Adjustment Shipped offsite for treatment/disposal	0	0
3.1.6	LA-W913 <i>Aqueous Wastes with Heavy Metals</i>	0	0	-	0	0
3.1.6	LA-W914 <i>Corrosive Solutions</i>	0	0	-	0	0
3.1.6	LA-W915 <i>Aqueous Cyanides, Nitrates, Chromates, and Arsenates</i>	0	0	-	0	0
3.1.7	LA-W916 <i>Water-Reactive Wastes</i>	0	0	-	0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15- FY19 (m <sup>3</sup> )
3.1.8	LA-W917 <sup>4</sup> <i>Compressed Gases Requiring Scrubbing</i>	1,456	0.624	Administrative Adjustment	0.833	0
			1.249	Administrative Adjustment		
			-1.872	Shipped offsite for treatment/disposal		
3.1.9	LA-W918 <i>Compressed Gases Requiring Oxidation</i>	0	0		0	0
3.1.10	LA-W920 <i>Elemental Mercury</i>	0	0		0	0
3.1.11	LA-W907 <i>Halogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W909 <i>Bulk Oils</i>	0	0		0	0
3.1.11	LA-W910 <i>PCB Wastes with RCRA Components</i>	0	0		0	0
3.1.11	LA-W923 <i>Liquid and Solid Oxidizers</i>	0	0		0	0
3.2	LA-W924 <i>Lead Wastes – TBD</i>	0	0		0	0
3.2	LA-W925 <i>Mercury Wastes – TBD</i>	0	0		0	0
3.2	LA-W926 <i>Compressed Gases – TBD</i>	0	0		0	0
3.2	LA-W927 <i>Biochemical Laboratory Wastes</i>	0	0		0	0
3.2	LA-W928 <i>Dewatered Treatment Sludge</i>	0	0		0	0
3.2	LA-W932 <i>Explosives</i>	0	0		0	0
3.2	LA-W933 <i>Labpacks</i>	0	0		0	0
3.2	LA-W934 <i>High Activity Waste</i>	1,301	0	Shipped offsite for treatment/disposal	1,301	0
			0	Administrative Adjustment		
3.3.1	LA-W930 <i>Lead for Surface Decontamination</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY13 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 25.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY14 Annual Update (m <sup>3</sup> )	Projection FY15- FY19 (m <sup>3</sup> )
3.3.2	LA-W929 <i>Nonradioactive or Suspect Waste Items to be Surveyed</i>	0	0		0	0
3.3.3	LA-W931 <i>Lead Requiring Sorting</i>	0	0		0	0
3.3.4	LA-W935 <i>10-100 nCi/g Waste</i>	97,000	591,305	Administrative Adjustment	11,545	50
			-676.76	Shipped offsite for treatment/disposal		
3.4	<i>Missing/ nonexistent/ TBV category</i>	0	0		0	N/A
<b>TOTALS</b>		<b>100,381</b>			<b>13,679</b>	

<sup>1</sup> CP is Compliance Plan; MWIR is Mixed Waste Inventory Report.

<sup>2</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>; however, due to FY13 changes in the way that the MTRU are process (repackaged) into several different containers and are no longer equal to those added to the MLLW inventory of LA-W935.

<sup>3</sup> Shipment details are in Appendix B; Administrative adjustments are in Appendix C.

<sup>4</sup> Items prohibited from shipment to WIPP are removed from MTRU STP containers and consolidated; some are MLLW and are included in Table A-1 as LA-W917 waste; others are MTRU waste and are considered *Combustible-Noncombustible Waste* in Table E-1.

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY12 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 24.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY13 Annual Update (m <sup>3</sup> )	Projection FY14- FY18 (m <sup>3</sup> )
3.1.1	LA-W901 <i>IPA Wastes</i>	0	0	-	0	0
3.1.1	LA-W902 <i>Scintillation Fluids</i>	0	0	-	0	0
3.1.2	LA-W903 <i>Lead Blankets</i>	0	0	-	0	0
3.1.2	LA-W904 <i>Soil with Heavy Metals</i>	0	0	-	0	0
3.1.2	LA-W905 <i>ER Soils</i>	0	0	-	0	0
3.1.3	LA-W906 <i>Aqueous Organic Liquids</i>	0	0		0	0
3.1.4	LA-W911 <i>Organic-Contaminated Combustible Solids</i>	0	0		0	0
3.1.4	LA-W919 <i>Organic-Contaminated Noncombustible Solids</i>	0	0		0	0
3.1.5	LA-W912 <i>Combustible Debris</i>	0	0		0	0
3.1.5	LA-W921 <i>Activated or</i>	0	0	-	0	0

CP <sup>1</sup> Sec.	MWRIR <sup>1</sup> Waste ID and Treatability Group/Category	FY12 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 24.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY13 Annual Update (m <sup>3</sup> )	Projection FY14– FY18 (m <sup>3</sup> )
	<i>Inseparable Lead</i>					
3.1.5	LA-W922 <i>Noncombustible Debris</i>	0.2082	0.416	Administrative Adjustment	0.624	0
			-0.0002	Administrative Adjustment (rounding corrections due to converting from 4 to 3 decimal places)		
3.1.6	LA-W913 <i>Aqueous Wastes with Heavy Metals</i>	0	0		0	0
3.1.6	LA-W914 <i>Corrosive Solutions</i>	0	0		0	0
3.1.6	LA-W915 <i>Aqueous Cyanides, Nitrates, Chromates, and Arsenates</i>	0	0	-	0	0
3.1.7	LA-W916 <i>Water- Reactive Wastes</i>	0	0		0	0
3.1.8	LA-W917 <sup>4</sup> <i>Compressed Gases Requiring Scrubbing</i>	0.8328	0.624	Administrative Adjustment	1.456	0
			-0.0008	Administrative Adjustment (rounding corrections due to converting from 4 to 3 decimal places)		
			0	Shipped offsite for treatment/disposal		
3.1.9	LA-W918 <i>Compressed Gases Requiring Oxidation</i>	0	0		0	0
3.1.10	LA-W920 <i>Elemental Mercury</i>	0	0		0	0
3.1.11	LA-W907 <i>Halogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W908 <i>Nonhalogenated Organic Liquids</i>	0	0		0	0
3.1.11	LA-W909 <i>Bulk Oils</i>	0	0		0	0
3.1.11	LA-W910 <i>PCB Wastes with RCRA Components</i>	0	0		0	0
3.1.11	LA-W923 <i>Liquid and Solid Oxidizers</i>	0	0		0	0
3.2	LA-W924 <i>Lead Wastes—TBD</i>	0	0		0	0
3.2	LA-W925 <i>Mercury Wastes—TBD</i>	0	0		0	0

CP <sup>1</sup> Sec.	MWIR <sup>1</sup> Waste ID and Treatability Group/Category	FY12 Annual Update (m <sup>3</sup> ) <sup>2</sup>	Proposed Revision 24.0 (m <sup>3</sup> )	Comments <sup>3</sup>	FY13 Annual Update (m <sup>3</sup> )	Projection FY14– FY18 (m <sup>3</sup> )
3.2	LA-W926 <i>Compressed Gases— TBD</i>	0	0		0	0
3.2	LA-W927 <i>Biochemical Laboratory Wastes</i>	0	0		0	0
3.2	LA-W928 <i>Dewatered Treatment Sludge</i>	0	0		0	0
3.2	LA-W932 <i>Explosives</i>	0	0		0	0
3.2	LA-W933 <i>Labpacks</i>	0	0		0	0
3.2	LA-W934 <i>High Activity Waste</i>	1,5079	-0.208  0.0011	Shipped offsite for treatment/disposal  Administrative Adjustment (rounding corrections due to converting from 4 to 3 decimal places)	1,301	0
3.3.1	LA-W930 <i>Lead for Surface Decontamination</i>	0	0		0	0
3.3.2	LA-W929 <i>Nonradioactive or Suspect Waste Items to be Surveyed</i>	0	0		0	0
3.3.3	LA-W931 <i>Lead Requiring Sorting</i>	0	0		0	0
3.3.4	LA-W935 <i>10–100 nCi/g Waste</i>	201,4007	1058,556  -23,0917  -1139,865	Administrative Adjustment  Administrative Adjustment (rounding corrections due to converting from 4 to 3 decimal places and removal or addition of overpack)  Shipped offsite for treatment/disposal	97,000	50
3.4	<i>Missing/ nonexistent/ TBD category</i>	0	0		0	N/A
	<b>TOTALS</b>	<b>203,9496</b>			<b>100,381</b>	

<sup>1</sup> CP is Compliance Plan; MWIR is Mixed Waste Inventory Report

<sup>2</sup> MLLW volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>; however, due to FY13 changes in the way that the MTRU are processed (repackaged) into several different containers, volumes are no longer equal to those added to the MLLW inventory of LA-W935.

<sup>3</sup> Shipment details are in Appendix B; Administrative adjustments are in Appendix C.

<sup>4</sup> Items prohibited from shipment to WIPP are removed from MTRU-STP containers and consolidated; some are MLLW and are included in Table A-1 as LA-W917 waste; others are MTRU waste and are considered *Combustible-Noncombustible Waste* in Table E-1.

**APPENDIX E CURRENT MTRU INVENTORY DETAIL**

Table E-1 TA-54 MTRU Covered Inventory (by Treatability Group)

Treatability Group	FY143 Annual Update (m <sup>3</sup> )	Proposed Revision 265.0 (m <sup>3</sup> ) <sup>1,2</sup>	Comments <sup>3</sup>	FY154 Annual Update (m <sup>3</sup> )	Projection FY165-2019 (m <sup>3</sup> )
Cemented Sludge	57,876,781.46				
		<del>(00.416)</del> <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		<del>(0.000)</del>	FY14 Shipped Offsite on Hold <sup>5</sup>		
		<del>0.8.882</del>	Shipped to WIPP (placed below grade)		
		<del>0.11.388</del>	Administrative Adjustments		
<b>FY154 Subtotal Cemented Sludge</b>				<b>57,876</b>	<b>0</b>
Combustible – Noncombustible Waste	473,246,694.935				
		<del>(63.67473.762)</del> <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		<del>6.0382.912</del>	New Covered		
		<del>(-153.204)</del>	FY14 Shipped Offsite on Hold <sup>5</sup>		
		<del>0.150.184</del>	Shipped to WIPP (placed below grade)		
		<del>-83.718.74.417</del>	Administrative Adjustments		
<b>FY154 Subtotal Combustible-Noncombustible Waste</b>				<b>395,566,473.246</b>	<b>100</b>
Combustible Waste	4,468,329.4				
		<del>(0.2080.738)</del> <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0.000	New Covered		
		<del>(0.000)</del>	FY14 Shipped Offsite on Hold <sup>5</sup>		
		<del>0.0.530</del>	Shipped to WIPP (placed below grade)		
		<del>01.704</del>	Administrative Adjustments		
<b>FY154 Subtotal Combustible Waste</b>				<b>4,468</b>	<b>0</b>
Glass Waste	0				
		(0) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		0	Shipped Offsite		
		0	Administrative Adjustments		
		<b>FY154 Subtotal Glass Waste</b>			
Leaded Glovebox Waste	0				
		(0) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		

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Treatability Group	FY143 Annual Update (m <sup>3</sup> )	Proposed Revision 265.0 (m <sup>3</sup> ) <sup>1,2</sup>	Comments <sup>3</sup>	FY154 Annual Update (m <sup>3</sup> )	Projection FY165–FY2019 (m <sup>3</sup> )
		0	New Covered		
		0	Shipped Offsite		
		0	Administrative Adjustments		
			<b>FY154 Subtotal Leaded Glovebox Waste</b>	<b>0</b>	<b>0</b>
<b>Metallic Waste</b>	<b>3,349,205.06</b>				
		(0.208) <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(-0.208)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		<del>0-17.157</del>	Administrative Adjustments		
			<b>FY154 Subtotal Metallic Waste</b>	<b>3,349</b>	<b>0</b>
<b>Noncombustible Waste</b>	<b>34,242,354.00</b>				
		<del>(1,248+086)</del> <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		0	New Covered		
		(-14.050)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		<del>0-30.294</del>	Shipped to WIPP (placed below grade)		
		<del>1,226,291.36</del>	Administrative Adjustments		
			<b>FY154 Subtotal Noncombustible Waste</b>	<b>35,468,342.43</b>	<b>100</b>
<b>Solidified Inorganic and Organic Waste</b>	<b>300,578,432.44</b> <sup>2</sup>				
		<del>(19,900,207.732)</del> <sup>4</sup>	3706 Non-cemented Above-ground EM Legacy TRU (MTRU waste only)		
		<del>00.208</del>	New Covered		
		(-20.196)	FY14 Shipped Offsite on Hold <sup>5</sup>		
		<del>0-18.324</del>	Shipped to WIPP (placed below grade)		
		<del>94,476-113.748</del>	Administrative Adjustments		
			<b>FY154 Subtotal Solidified Inorganic and Organic Waste</b>	<b>395,054,300.578</b>	<b>10</b>
<b>TOTAL FY143:</b>	<b>873,759,126.4723</b>		<b>Total FY154 Inventory:</b>	<b>891,781,873.759</b>	<b>210</b>

<sup>1</sup> MTRU waste volumes are calculated using the conversion: 55-gallon container = 0.208 m<sup>3</sup>; 85-gallon container = 0.322 m<sup>3</sup>.

<sup>2</sup> Volumes are represented to three decimal places.

<sup>3</sup> Shipping details are found in Appendix F, and Administrative Adjustments are found in Appendix G.

<sup>4</sup> Amount already included in the MTRU STP covered inventory.

<sup>5</sup> NMED has determined that the removal of MTRU from the STP will be deferred until more information becomes available and is the final disposition of the waste currently stored at the off-site facility is determined. Amount already included in the MTRU STP covered inventory.

Table E-2 MTRU Inventory at TA-55 and CMR

Location	FY143 MTRU Inventory (m <sup>3</sup> ) <sup>1</sup>	Treatability Group	Proposed Revision 265.0 (m <sup>3</sup> )	Comments <sup>1</sup>	FY154 MTRU Inventory (m <sup>3</sup> )
CMR	<del>5.7004.9</del>	Combustible-Noncombustible Waste	<del>4.1883.800</del>	New Covered	
			<del>-0.0880.000</del>	Administrative Adjustment	
<b>Total FY154 CMR Inventory</b>					<b><u>9.8005.7</u></b>
TA-55	<del>3.0313.254</del>	Combustible-Noncombustible Waste	<del>2.9124.252</del>	New Covered	
			<del>-0.6244.475</del>	Administrative Adjustment	
<b>FY154 TA-55 Combustible-Noncombustible Waste Inventory</b>					<b><u>5.3193.034</u></b>
TA-55	<b>0.019</b>	Combustible Waste	<del>3.1260.208</del>	New Covered	
			<del>1.8590.208</del>	Administrative Adjustment	
<b>FY154 TA-55 Combustible Waste Inventory</b>					<b><u>5.0040.019</u></b>
TA-55	<del>28.79131.987</del>	Metallic Waste	<del>-6.3983.196</del>	Administrative Adjustment	
<b>FY154 TA-55 Metallic Waste Inventory</b>					<b><u>22.39328.791</u></b>
TA-55	<del>4.6089.597</del>	Noncombustible Waste	0.832	New Covered	
			<del>-2.3205.821</del>	Administrative Adjustment	
<b>FY154 TA-55 Noncombustible Waste Inventory</b>					<b><u>3.1204.608</u></b>
TA-55	<b>0.208</b>	Solid Inorganic and Organic Waste			
<b>FY154 TA-55 Solidified Inorganic and Organic Waste Inventory</b>					<b><u>0.208</u></b>
<b>Total FY154 TA-55 Inventory</b>					<b><u>36.04436.657</u></b>
	<del>42.35746.965</del>	<b>Total FY154 CMR/TA-55 Inventory</b>			<b><u>45.84442.357</u></b>

<sup>1</sup> Shipping details are found in Appendix F and Administrative Adjustments are found in Appendix G. Since all waste is shipped from TA-54, there are no shipping data for CMR/TA-55, only transfers to TA-54, which are included in the Appendix G.

**APPENDIX F FY154 MTRU WASTE SHIPMENTS TO WIPP**

Table F-1 FY154 MTRU Shipments to WIPP

FY154 Quarter	Treatability Group	Existing FY154 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Removed from Inventory (placed below grade) (m <sup>3</sup> )	Total FY14 Inventory (above grade) on Hold (m <sup>3</sup> )	Total Volume Shipped (m <sup>3</sup> ) <sup>1</sup>
Q1	Cemented Sludge Total	7,594	0	7,594	0	5,200
	Combustible - Noncombustible Waste Total	106,888	0	106,888		122,408
	Combustible Waste Total	0,530	0	0,530	0	0,416
	Noncombustible Waste Total	24,886	0	24,886	0	24,544
	Solidified Inorganic and Organic Waste Total	8,548	0,208	8,756	0	8,528
Q1	Q1 Total	0148,446	0,208	0148,654	0	0161,096
Q2	Cemented Sludge Total	1,288	0	1,288	0	0,832
	Combustible - Noncombustible Waste Total	52,344	0	43,296	9,048	52,116
	Noncombustible Waste Total	5,408	0	5,408	0	5,408
	Solidified Inorganic and Organic Waste Total	9,568	0	9,568	0	9,568
Q2	Q2 Total	068,608	0	059,560	09,048	067,924
Q3	Q3 Total	0	0	0	0	0
Q4	Q4 Total	0	0	0	0	0
<b>Grand Total</b>		<b>0217,054</b>	<b>0,208</b>	<b>0208,214</b>	<b>09,048</b>	<b>0229,020</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

Table F-2 FY14 MTRU Shipments to WCS<sup>2</sup>

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FY14 Quarter	Treatability Group	Existing FY14 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Inventory on Hold (m <sup>3</sup> )	Total Volume Shipped (m <sup>3</sup> ) <sup>1</sup>
Q3	Combustible-Noncombustible Waste Total	120.848	0.416	121.264	121.264
	Metallic Waste Total	0.208	0	0.208	0.208
	Noncombustible Waste Total	14.050	0	14.050	13.936
	Solidified Inorganic and Organic Waste Total	20.196	0	20.196	19.968
<b>Grand Total</b>		<b>155.302</b>	<b>0.416</b>	<b>155.718</b>	<b>155.376</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

<sup>2</sup> Volumes shipped in FY14 but not removed from the STP inventory.

Table F-3 FY14 MTRU Shipments to AMWTP (INL)<sup>3</sup>

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FY14 Quarter	Treatability Group	Existing FY14 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Inventory on Hold <sup>2</sup> (m <sup>3</sup> )	Total Volume Shipped (m <sup>3</sup> ) <sup>1</sup>
Q1	Combustible-Noncombustible Waste Total	5.049	0	5.049	5.049
Q2	Combustible-Noncombustible Waste Total	15.294	0	15.294	15.294
Q3	Combustible-Noncombustible Waste Total	2.549	0	2.549	2.549
<b>Grand Total</b>		<b>22.892</b>	<b>0.416</b>	<b>22.892</b>	<b>22.892</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

<sup>2</sup> LANL -waste treated at INL and stored at a WCS facility as of November 2014. Original containers and volume continue to be tracked since treated containers were not created at LANL.

<sup>3</sup> Volumes shipped in FY14 but not removed from the STP inventory.

Table F-4 FY14 MTRU Shipments to WIPP<sup>2</sup>

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FY14 Quarter	Treatability Group	Existing FY14 Inventory Volume (m <sup>3</sup> )	New Covered Volume (m <sup>3</sup> )	Total Inventory on Hold (above grade) (m <sup>3</sup> )	Total Volume Shipped (above grade) (m <sup>3</sup> ) <sup>1</sup>
Q2	Combustible-Noncombustible Waste Total	9.048	0	9.048	8.820
<b>Grand Total</b>		<b>9.048</b>	<b>0</b>	<b>9.048</b>	<b>8.820</b>

<sup>1</sup> Volumes shipped may be lower than volumes removed from the STP inventory due to the removal of overpacks before shipping.

<sup>2</sup> Volumes shipped in FY14 but not removed from the STP inventory.

**APPENDIX G CURRENT YEAR MTRU INVENTORY –  
ADMINISTRATIVE ADJUSTMENTS**

Table G-1 FY154 MTRU Administrative Adjustments to TA-54 Inventory

Treatability Group	Administrative Adjustment	Volume (m <sup>3</sup> )
Cemented Sludge	Reclassified as MLLW (LA-W935)	-0.624
	Double counted volume for both reassigned treatability groups and volume changes in FY13.	-10.442
	Volume changes due to addition or removal of overpacks (85 or 110 gallon)	0.114
	S811822 counted as a reassigned treatability group but was not changed in FY13	0.208
	S811812 was reassigned treatability group but was not changed in FY13	-0.208
	STP containers from Cemented Sludge treatability groups were reassigned to 0.644 m <sup>3</sup> Solidified Organic and Inorganic Waste treatability groups consistent with current categorization of waste types for shipment to WIPP and volume changes are also include in this table.	-0.644
	STP containers from Solidified Organic and Inorganic treatability groups were reassigned to 0.208 m <sup>3</sup> Cemented Sludge Waste treatability groups consistent with current categorization of waste types for shipment to WIPP and volume changes are also include in this table.	0.208
<b>Cemented Sludge Net Adjustment</b>		<b><u>0-11.388</u></b>
Combustible- Noncombustible Waste	Reclassified as MLLW (LA-W935)	-1.872-7.572
	Added as a result from reconciliation of inconsistencies in the current inventory S793723 inadvertently mistaken for the wrong treatability group in FY13	<u>2.086-0.322</u>
	S811822 counted as a reassigned treatability group but was not changed in FY13	-0.208
	91908 volume increased due to addition of overpacks (496 gallon) in FY13	1.692
	Added as a result of a review of the initial radioactive assay which determined that these containers were originally reclassified to LLW without consideration of the minimum detectable activities for undetected radionuclides.	2.912
	Removed as a result of repackaging/remediation	-422.387
	Added as a result of repackaging/remediation	420.052
	Removed as a result of historical remediation; in that re-packaging activities were overlooked and not properly recorded. Clerical errors related to conversion from paper to database inventory.	-84.650
	63037, 87121, and 87122 counted twice in repacked and reclassified in FY13	2.316
	S822849 inadvertently reassigned to the wrong treatability group in FY13	0.208
	Two glove bags were added as a result of repack in FY13	0.416
	92302 was counted three times. Removed 2x the volume in FY13	-3.800
	Volume changes due to addition or removal of overpacks (85 gallon, or standard waste box [SWB], or TDOP ten drum overpack)	<u>8.2565-076</u>
	Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	-1.694
	94166, 94161, 94139, 94138 counted twice in Repacking in FY13	-0.832
	64741 counted twice in transfer and New Covered in FY13	-0.208
	STP containers from Combustible-Noncombustible Waste treatability groups were reassigned to 96,2009.530 m <sup>3</sup> Solidified Inorganic and Organic Combustible Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also included in this table.	<u>-94.666-0.530</u>
STP containers from Solidified Inorganic and Organic Waste treatability groups were reassigned to 1.174 m <sup>3</sup> Combustible Noncombustible Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also include in this table.	1.174	

Treatability Group	Administrative Adjustment	Volume (m <sup>3</sup> )
	Added as a result of recharacterizing TRU inventory as MTRU during repackaging	5.858
	Additional covered inventory transferred from TA-55 covered inventory	4,1727.388
	<b>Combustible-Noncombustible Net Adjustment</b>	<b>-83.718-74.417</b>
Combustible Waste	Added as a result of a review of the initial radioactive assay which determined that these containers were originally reclassified to LLW without consideration of the minimum detectable activities for undetected radionuclides.	0.624
	Double counted volume for both reassigned treatability groups and volume changes in FY13.	0.550
	STP containers from Combustible-Noncombustible Waste treatability groups were reassigned to 0.530 m <sup>3</sup> Combustible Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also include in this table.	0.530
	<b>Combustible Waste Net Adjustment</b>	<b>01.704</b>
Metallic Waste	Removed as a result of repackaging/remediation	-19.050
	Added as a result of repackaging/remediation	1.893
	<b>Metallic Waste Net Adjustment</b>	<b>0-17.157</b>
Noncombustible Waste	Added as a result of potentially hazardous constituents identification based on investigation of characterization of TRU nitrate salts waste Reclassified as MLLW (LA-W935)	1,288-0.208
	Removed as a result of repackaging/remediation	-0.322
	Added as a result of repackaging/remediation	29.666
	Volume changes due to addition or removal of overpacks (85 gallon, SWB, or TDOPten drum overpack)	0.114
	Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	-0.176
		<b>Noncombustible Waste Net Adjustment</b>
Solidified Inorganic and Organic Waste	Reclassified as MLLW (LA-W935) Additional covered inventory transferred from TA-55 covered inventory	-2.4220.416
	Added as a result from reconciliation of inconsistencies in the current inventory	0.208
	S793723 inadvertently mistaken for the wrong treatability group in FY13	0.322
	S843646 was reassigned a treatability group however, it was not added into that group in FY13	0.322
	Removed as a result of repackaging/remediation	-130.280
	Added as a result of repackaging/remediation	16.022
	Added as a result of a review of the initial radioactive assay which determined that these containers were originally reclassified to LLW without consideration of the minimum detectable activities for undetected radionuclides.	0.530
	Volume changes due to addition or removal of overpacks (85 or 110 gallon)	0.490-0.134
	S822849 inadvertently reassigned to the wrong treatability group in FY13	-0.208
	S811812 was reassigned treatability group but was not changed in FY13	0.208
	93667 counted twice in repackaging in FY13	-0.208
	STP containers from Combustible-Noncombustible Waste Cemented Sludge treatability groups were reassigned to 96,2000.644 m <sup>3</sup> Solidified Organic and Inorganic Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also include in this table.	96.2000.644
	STP containers from Solidified Inorganic and Organic Waste treatability groups were reassigned to 0.208 m <sup>3</sup> Cemented Sludge Waste treatability groups consistent with current categorization of waste types for shipment to WIPP and volume changes are	-0.208

Treatability Group	Administrative Adjustment	Volume (m <sup>3</sup> )
	<del>also include in this table.</del> <del>STP containers from Solidified Inorganic and Organic Waste treatability groups were reassigned to 1.174 m<sup>3</sup> Combustible Noncombustible Waste treatability groups consistent with current categorization of waste types for shipment to WIPP. Volume changes are also include in this table.</del>	<del>-1.174</del>
	<i>Solidified Inorganic and Organic Waste Net Adjustment</i>	<del>94,476-113,748</del>
	<i>Total Net TA-54 Adjustment</i>	<del>11,984-185,870</del>

Table G-2 FY154 MTRU Administrative Adjustments for CMR and TA-55 Inventory

Location	Treatability Group	Administrative Adjustment	Volume (m <sup>3</sup> )
CMR	Combustible-Noncombustible Waste	Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	<del>-0.0880</del> <b>-0.000</b>
<b>Net Adjustment CMR Inventory</b>			<b>-0.0880</b>
TA-55	Combustible-Noncombustible Waste	Volume changes due to addition or removal of overpacks (85 or 496 gallon) Container was reassayed and removed as a result of recharacterizing to MLLW in FY12.	<del>1.254</del> <b>0.019</b>
		Containers was reassay and removed as a result of recharacterizing to LLW	<del>-0.624</del>
		Transferred to TA-54 and assigned to Combustible-Noncombustible Waste in the TA-54 inventory	<del>-1.878</del> <b>-0.832</b>
<b>Net Adjustment TA-55 Combustible-Noncombustible Waste</b>			<b>-0.624</b> <del>-1.475</del>
TA-55	Combustible Waste	Volume changes due to addition or removal of overpacks (85 or 496 gallon) Transferred to TA 54 and assigned to Combustible Noncombustible Waste in the TA 54 inventory.	<del>1.859</del> <b>0.208</b>
<b>Net Adjustment TA-55 Combustible Waste</b>			<b>1.859</b> <del>0.208</del>
TA-55	Metallic Waste	Transferred to CMR for Material Retrieval	<del>-6.398</del> <b>-3.199</b>
		Volume corrections due to rounding to three decimal places.	<del>0.003</del>
<b>Net Adjustment TA-55 Metallic Waste</b>			<b>-6.398</b> <del>-3.196</del>
TA-55	Noncombustible Waste	Transferred to TA-54 and assigned to Combustible-Noncombustible Waste in the TA-54 inventory	<del>-2.294</del> <b>-5.405</b>
		Volume changes due to addition or removal of overpacks (85 or 496 gallon) Transferred to TA 54 and assigned to Solidified Inorganic and Organic Waste	<del>-0.004</del> <b>-0.416</b>
		Volume changes due to rounding corrections for SWB from 1 decimal to 3 decimal places for consistency throughout the report (1.9 to 1.878)	<del>-0.022</del>
<b>Net Adjustment TA-55 Noncombustible Waste</b>			<b>-2.320</b> <del>-5.821</del>
<b>Net Adjustment TA-55 Inventory</b>			<b>-7.483</b> <del>-10.700</del>
<b>Total Net TA-55/CMR Adjustment</b>			<b>-7.571</b> <del>-10.700</del>

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Table G-3 MTRU Administrative Adjustments – TA-54 Volume Adjustments [Table omitted]

Table G-4 MTRU Administrative Adjustments – TA-54 Containers Added [Table omitted]

## APPENDIX H MLLW TREATMENT FACILITIES

Table H-1 Commercial Facilities Contacted for Waste Treatment Capabilities

Commercial Facility	Location
Perma-Fix (including Material & Energy Corporation in Tennessee; Diversified Scientific Services, Inc. in Tennessee; and Perma-Fix North West in Washington)	Florida
Waste Control Specialists	Texas
EnergySolutions of Utah (including Bear Creek Operations in Tennessee)	Utah
Nuclear Fuel Services	Tennessee
Integrated Environmental Services	Tennessee
NSSI	Texas

**APPENDIX I CORRESPONDENCE**

Table I-1 Expedited Shipment Letters [\[Table omitted\]](#)

Letter Date	Description	Letter Number	Revision Reference	Listed in Revision 254.0 (Appendix I)
4-15-2014	Notice of Completion of Expedited Offsite Waste Shipment Activity 3.1.5	WM-DO-14-027	25	Yes

Table I-2 Correspondence

Letter Date	Description	Letter Number	Revision Reference	Listed in Revision 254.0 (Appendix I)
10-3-2013	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-13-0062	25	Yes
10-3-2013	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-13-0063	25	Yes
10-8-2013	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-13-0070	25	Yes
10-10-2013	Notification of Force Majeure and Lapse of Appropriations	ADESH-13-0056	25	Yes
10-14-2013	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-13-0072	25	Yes
11-1-2013	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-13-0077	25	Yes
11-7-2013	Update to the October 10, 2013 Notice of Force Majeure	ADESH-13-060	25	Yes
11-14-2013	Notification of Activity 4.0 Waste Shipment Offsite for Treatment or Recycling at a Noncommercial Facility	WM-DO-13-0080	25	Yes
11-14-2013	Notice of Completion of Offsite Waste Shipment, FY13, Q4, Activity 4.0	WM-DO-13-0079	25	Yes
11-19-2013	Notification of Activity 4.0 Waste Shipment Offsite for Treatment or Recycling at a Noncommercial Facility—Supplemental Information	WM-DO-13-0082	25	Yes
12-20-2013	Request for Extension for the Los Alamos National Laboratory's Site Treatment Plan FY12 and FY13 Annual Updates	WM-DO-13-0094	25	Yes
12-20-2013	Request to Extend Compliance Plan Milestone for Activity 3.2	WM-DO-13-0096	25	Yes
12-20-2013	Request for Amendment to Extend STP Compliance Milestone for Activity 3.3.4	WM-DO-13-0095	25	Yes
1-2-2014	Notice of Completion of Offsite Waste Shipment for Treatment or Recycling at a Noncommercial Facility, Activity 2.3.2	WM-DO-13-0093	25	Yes
1-2-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-13-0092	25	Yes

Letter Date	Description	Letter Number	Revision Reference	Listed in Revision 254.0 (Appendix I)
1-16-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-004	25	Yes
1-23-2014	Notice of Completion of Offsite Waste Shipment for Treatment or Recycling at a Noncommercial Facility, Activity 2.3.2	WM-DO-14-014	25	Yes
1-23-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-015	25	Yes
2-10-2014	Response to the 12-9-2013 Notice of Disapproval of the FY12 STP Annual Report and Proposed Revision 23.0	WM-DO-14-017	25	Yes
2-13-2014	Notice of Completion of Offsite Waste Shipment, FY14, Q1, Activity 4.0	WM-DO-14-018	25	Yes
2-27-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-019	25	Yes
4-2-2014	Notice of Completion of Offsite Waste Shipment for Treatment or Recycling at a Noncommercial Facility, Activity 2.3.2	WM-DO-14-022	25	Yes
4-2-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-021	25	Yes
4-15-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-026	25	Yes
4-15-2014	45 Day Notification, Proposed Deletion of Waste	WM-DO-14-023	25	Yes
4-15-2014	Notice of Completion of Offsite Waste Shipment for Treatment or Recycling at a Noncommercial Facility, Activity 2.3.2	WM-DO-14-025	25	Yes
4-16-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-028	25	Yes
4-24-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-030	25	Yes
5-8-2014	Notice of Completion of Offsite Waste Shipment Activity 3.3.4	WM-DO-14-037	25	Yes
5-8-2014	Notice of Completion of Offsite Waste Shipment for Treatment or Recycling at a Noncommercial Facility, Activity 2.3.2	WM-DO-14-036	25	Yes
5-8-2014	Notice of Completion of Offsite Waste Shipment, FY14 Q2, Activity 4.0	WM-DO-14-038	25	Yes
5-8-2014	Deletion of Covered Waste Under the STP	WM-DO-14-035	25	Yes
5-14-2014	Amendment to the Proposed FY12 Annual Update	WM-DO-14-034	25	Yes
5-14-2014	Notice of Completion of Offsite Waste Shipment for Storage Pending Disposal, Activity 4.0	WM-DO-14-039	25	Yes
5-21-2014	Correction of Off Site Waste Shipment Notifications, FY13, Activity 3.3.4	WM-DO-14-040	25	Yes
5-21-2014	45 Day Notification, Proposed Deletion of Waste	WM-DO-14-042	25	Yes
5-22-2014	Correction of Off Site Waste Shipment Notification, FY13, Activity 4.0	WM-DO-14-041	25	Yes

Letter Date	Description	Letter Number	Revision Reference	Listed in Revision 254.0 (Appendix I)
5-28-2014	Notice of Completion of Off-Site Waste Shipment for Storage Pending Disposal, Activity 4.0	WM-DO-14-043	25	Yes
6-9-2014	Submittal of FY13 Annual Update and Proposed 24.0	WM-DO-14-044	25	Yes
6-9-2014	Notice of Completion of Off-Site Waste Shipment Activity 3.3.4	WM-DO-14-045	25	No
7-2-2014	Notice of Completion of Off-Site Waste Shipment Activity 3.1.5	WM-DO-14-046	25	No
7-2-2014	Notice of Completion of Off-Site Waste Shipment Activity 3.3.4	WM-DO-14-047	25	No
7-9-2014	Notice of Completion of Off-Site Shipment Activity 3.1.8	WM-DO-14-049	25	No
8-7-2014	Notice of Completion of Off-Site Waste Shipment Activity 3.1.5	WM-DO-14-051	25	No
8-13-2014	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY14 Q3	WM-DO-14-052	25	No
9-8-14	Notice of Completion of Off-Site Waste Shipment Activity 3.3.4	WM-DO-14-054	25	No
11-12-2014	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY14 Q4	WM-DO-14-063	265	YesNo
1-12-2015	15-Day Notification, Proposed Deletion of Waste	WM-DO-15-001	265	YesNo
2-4-2015	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY15, Q1	WM-DO-15-002	265	YesNo
3-24-2015	Corrections of Off-Site Waste Shipment Notification, FY14, Activity 3.3.4 and 3.1.5	WM-DO-15-007	265	YesNo
3-24-2015	Corrections of Off-Site Waste Shipment Notifications, FY14, Activity 4.0	WM-DO-15-003	265	YesNo
3-24-2015	Notice of Completion of Off-Site Waste Shipment Activity 3.1.8	WM-DO-15-006	265	YesNo
3-30-2015	Submittal of FY14 Annual Update and Proposed 25.0	WM-DO-15-008	265	YesNo
4-23-2015	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY15, Q2	WM-DO-15-014	25	No
7-9-2015	Notice of Completion of Off-Site Waste Shipment Activity 4.0, FY15, Q3	WM-DO-15-025	25	No
8-13-2015	15-Day Notification, Proposed Deletion of Waste	WM-DO-15-028	25	No
9-24-2015	Response to the August 26, 2015, Notice of Disapproval of the Los Alamos National Laboratory's Federal Facility Compliance Order Annual Site Treatment Plan Update for Fiscal Year 2014 Revision 25.0	WM-DO-15-032	25	No

## APPENDIX J HISTORY OF CHANGES TO THE CP AND FFCO

As discussed in Part III (CP), Section 1.2, the STP CP 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, FFCO, as amended and revised. This Appendix provides a summary of these CP changes and of modifications to the FFCO since its issuance.

To date, there have been 25 revisions and three amendments to the CP. In addition, the FFCO was amended once on May 20, 1997. The following Table J-1 provides a summary of these changes. More detailed descriptions can be found in the CP Update portion of each year’s STP Annual Update and the original correspondence requesting each change.

Table J-1 Summary of Changes to the CP and the FFCO

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CP	6/12/96	Added offsite treatment as a parallel preferred option for most MLLW treatability groups.
Rev. 2.0	STP/CP	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW.
Amendment 1.0	STP/CP	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates.
Rev. 3.0	STP/CP	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/CP	9/4/97	Extended CP Activity 3.1.2B Compliance Date to 12/29/97.
Rev. 4.0	STP/CP	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/CP	12/29/97	Added volumes reported in FY95 and FY96 Annual Updates (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CP Appendices, and deleted treated items.
Rev. 6.0	STP/CP	7/31/98	Added volumes reported in FY97 Annual Update 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/CP	11/30/98	Removed onsite treatment skids, added STP inventory items, added onsite recycling/re-use and radiological decontamination, added notification for offsite treatability studies.
Rev. 8.0	STP/CP	12/3/98	Extended compliance dates for treatment of MTRU waste.
Rev. 9.0	STP/CP	6/7/00	Added and deleted volumes reported in FY98 Annual Update to certain treatability groups.
Amendment 3.0	STP/CP	8/30/99	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.
Rev. 10.0	STP/CP	12/18/00	Added and deleted volumes reported in FY99 Annual Update to certain treatability groups.
Rev. 11.0	STP/CP	4/18/01	Added and deleted volumes reported in FY00 Annual Update.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 12.0	STP/CP	3/13/02	Added and deleted volumes reported in FY01 <i>Annual Update</i> . Extended CP Activity 3.1.5A Compliance Date to 8/25/03. Extended CP Activity 3.1.11A to 2/01/04. Removed the requirement to develop treatment technologies and the associated compliance schedule in CP Activity 4.0 and added language specifying that MTRU waste would be shipped offsite to WIPP for disposal.
Rev 13.0	STP/CP	7/14/03	Added and deleted volumes reported in FY02 <i>Annual Update</i> .
Rev 14.0	STP/CP	1/5/05	Added and deleted volumes reported in FY03 <i>Annual Update</i> .
Rev 15.0	STP/CP	8/16/05	Added and deleted volumes reported in FY04 <i>Annual Update</i> .
Rev 16.0	STP/CP	12/12/06	Added and deleted volumes reported in FY05 <i>Annual Update</i> . Extended CP Activity 3.1.8(A) Compliance Date to 8/09/07. Extended CP Activity 3.1.9(A) Compliance Date to 8/09/07. Extended CP Activity 3.1.10(A) Compliance Date to 8/31/07. Extended CP Activity 3.1.11(A) Compliance Date to 12/31/07. Extended CP Activity 3.2(J) Compliance Date to 12/31/07. Reclassified 0.2082 m <sup>3</sup> of LA-W934 High Activity MLLW waste to MTRU waste.
Rev 17.0	STP/CP	6/26/08	Added and deleted volumes reported in FY06 <i>Annual Update</i> . Extended CP 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 CP Activity 3.1.9(A) Compliance Date to 8/28/08. Extended CP Activity 3.2(J) Compliance Date to 12/31/08.
Rev 18.0	STP/CP	1/9/09	Added and deleted volumes reported in FY07 <i>Annual Update</i> . Extended CP Activity 3.1.8(A) Compliance Date to 8/28/09. Extended CP 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 CP Activity 3.3.4 (A) Compliance Date 12/01/13 and CP Activity 3.3.4 (B) Compliance Date 12/31/13. Extended CP Activity 3.2(J) Compliance Date to 12/31/10.
Rev 19.0	STP/CP	2/5/10	Added and deleted volumes reported in FY08 <i>Annual Update</i> . Extended compliance date for CP Activities 3.1.8(A) and 3.1.9(A) to 8/28/12. Proposed a new milestone of 12/31/2010 for 3.1.4(A) and a new milestone 3.3.4(C) for 10-100 nCi/g Waste.
Rev 20.0	STP/CP	11/8/10	Added and deleted volumes reported in FY09 <i>Annual Update</i> . Proposed an extended compliance date for CP Activity 3.2(J).
Rev 21.0	STP/CP	3/21/12	Added and deleted volumes reported in FY10 <i>Annual Update</i> . Proposed new compliance date for CP Activity 3.1.8(A).
Rev 22.0	STP/CP	12/10/12	Added and deleted volumes reported in FY11 <i>Annual Update</i> .
Rev 23.0	STP/CP	<del>08-26-2015</del> FBD	Added and deleted volumes reported in FY12 <i>Annual Update</i> . Added Table 4.0-1 Treatability Groups for the Framework Agreement MTRU Waste
Rev 24.0	STP/CP	<del>08-26-2015</del> FBD	Added and deleted volumes reported in FY13 <i>Annual Update</i> . Proposed compliance date for CP Activity 3.1.5(A). Proposed compliance date for CP Activity 3.1.8(A). Extended CP Activity 3.2(J) Compliance Date to 6/30/2018. Proposed compliance date for CP Activity 3.3.4 (A and B)

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev 25.0	STP/CP	TBD	Added and deleted volumes reported in FY14 Annual Update On Hold volumes reported shipped in FY14 Annual Update Proposed compliance date for CP Activity 3.1.8(A) Proposed compliance date for CP Activity 3.3.4 (A and B)
<u>Rev 26.0</u>	<u>STP/CP</u>	<u>TBD</u>	<u>Added and deleted volumes reported in FY15 Annual Update</u> <u>On Hold volumes reported shipped in FY14 Annual Update</u> <u>Proposed compliance date for CP Activity 4.0-2 (C)</u>

## REFERENCES

1. *Federal Facility Compliance Order (Los Alamos National Laboratory)*, New Mexico Environment Department (October 4, 1995).
2. 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).
3. 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).

