Waste Management Programs Group
Los Alamos National Laboratory
P.O. Box 1663, M969
Los Alamos, NM 87545
(505) 667-8160

RECEIVED
FEB 14 2018
NMED
Hazardous Waste
Bureau

ENTERED

National Nuclear Security Administration
Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, NM 87544
(505) 667-5105/Fax (505) 667-5948

Date: FEB 14 2018
Symbol: EPC-DO: 18-043
LA-UR: LA-UR-18-21081
Locates Action No.:

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

Subject: **Notice of Completion of Off-Site Waste Shipment for Final Disposal, Activity 4.0, Compliance Plan, Site Treatment Plan, Federal Facility Compliance Order, Los Alamos National Laboratory**

Dear Ms. Briley:

This letter notifies the New Mexico Environment Department (NMED), per Section IX(A)(1), Deletion of Waste in the Federal Facility Compliance Order (FFCO), which requires that the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) notify NMED of off-site shipments of waste included in the Site Treatment Plan (STP), and provide documentation of the receipt of the waste at an off-site storage facility within 45 days of its receipt.

In April 2014, LANS shipped waste to the Waste Control Specialists (WCS) facility in Andrews Texas for temporary off-site storage due to the closure of the Waste Isolation Pilot Plant (WIPP). WIPP is now operational and is accepting waste for final disposal.

38394

This letter also notifies NMED that a total of 6 Standard Waste Boxes (SWB) on the STP inventory list (16-55 gallon inner containers packaged in 6 SWBs), were received by WIPP for final disposal in January 2018, as detailed in the enclosed waste manifests (Enclosure 2).

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, which, 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 Ellen E. Gammon at (505) 665-5587, or by email at eboyea@lanl.gov, or Adrienne L. Nash at (505) 665-5026, or by email at adrienne.nash@nnsa.doe.gov.

Sincerely,

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

Sincerely,

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

EG/AN:aomm

Enclosure 1: MTRU Waste Shipment Detail
Enclosure 2: MTRU Waste Shipment Manifest
Enclosure 3: Letter from John E. Kieling (Notice of Completion of Off-Site Waste Shipment for Storage Pending Disposal, Activity 4.0, Compliance Plan, Site Treatment Plan, Federal Facility Compliance Order Los Alamos National Laboratory HWB-LANL-14-0426)

Cy: John Kieling, NMED-HWB, (E-File)
Adrienne L. Nash, LASO-LA, (E-File)
Jody M. Pugh, NA-LA, (E-File)
Darlene S. Rodriguez, LASO-NS-LP, (E-File)
David J. Nickless, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Susan L. McMichael, LC-ESH, (E-File)
John C. Bretzke, ADESH, (E-File)
Benjamine B. Roberts, EPC-DO, (E-File)
Tammy A. Diaz, EPC-WMP, (E-File)
Alice Olivia Michelle Martinez, EPC-WMP, (E-File)
David J. Funk, ADEM, (E-File)
Patrice A. Stevens, ADPSM, (E-File)

Wayne P. Hohs, WD-DO, (E-File)
Donald L. Allen, WD-WPE, (E-File)
David E. Frederici, WD-WPE, (E-File)
Sean B. French, WD-WPE, (E-File)
Dawn Ramirez, WD-WPE, (E-File)
Taunia S. Van Valkenburg, EPC-CP, (E-File)
Mark P. Haagenstad, EPC-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)
adesh-records@lanl.gov, (E-File)

ENCLOSURE 1

MTRU Shipment Details Table

EPC-DO: 18-043

LA-UR: 18-21081

Date: FEB 14 2018

MTRU Shipment Details Table

CP Section	Container ID	Waste Stream	Acceptable Knowledge ID	Treatability Group	Manifest No.	Volume Removed from STP Inventory (m3)	Volume Shipped (m3)	Shipment Date
4	LASB50097\LA00000069075	LA-MHD01.001	CCP-AK-LANL-006	*Combustible-Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50097\93828	LA-CIN01.001	CCP-AK-LANL-006	*Combustible-Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50097\LA00000069328	LA-MHD01.001	CCP-AK-LANL-006	*Combustible-Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50029\S850246	LA-MIN03-NC.001	CCP-AK-LANL-004	*Solidified Organic and Inorganic Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50029\LA00000069252	LA-MHD01.001	CCP-AK-LANL-006	*Combustible-Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50029\LA00000069328	LA-MHD01.001	CCP-AK-LANL-006	*Combustible-Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50042\92985	LA-MHD01.001	CCP-AK-LANL-006	*Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50042\85894	LA-MHD01.001	CCP-AK-LANL-006	*Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50016\LA00000057974	LA-MIN04-S.001	CCP-AK-LANL-006	*Solidified Organic and Inorganic Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50016\LA00000069371	LA-MHD01.001	CCP-AK-LANL-006	*Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB 50016\84455	LA-MHD01.001	CCP-AK-LANL-006	*Noncombustible Waste*	014974169JJK	0.208	0.208	1/5/2018
4	LASB50065\87521	LA-MHD03.001	CCP-AK-LANL-009	*Combustible-Noncombustible Waste*	014974170JJK	0.208	0.208	1/5/2018
4	LASB50065\S864656	LA-CIN01.001	CCP-AK-LANL-006	*Solidified Organic and Inorganic Waste*	014974170JJK	0.208	0.208	1/5/2018
4	LASB50054\LA00000069051	LA-MHD03.001	CCP-AK-LANL-009	*Combustible-Noncombustible Waste*	014974170JJK	0.208	0.208	1/5/2018
4	LASB50054\S850109	LA-MIN03-NC.001	CCP-AK-LANL-004	*Solidified Organic and Inorganic Waste*	014974170JJK	0.322	0.208	1/5/2018
4	LASB50054\LA00000069231	LA-CIN01.001	CCP-AK-LANL-006	*Combustible-Noncombustible Waste*	014974170JJK	0.208	0.208	1/5/2018

ENCLOSURE 2

MTRU Shipment Manifests

EPC-DO: 18-043

LA-UR: 18-21081

Date: FEB 14 2018

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: NM0890010515
2. Page 1 of: 1
3. Emergency Response Phone: 505 667 6211
4. Manifest Tracking Number: 014974169 JJK

5. Generator's Name and Mailing Address: WCS on behalf of LANL on behalf of U.S.DOE, 9998W State HWY 176, Andrews, TX 79714
Generator's Phone: 432-525-8500

Generator's Site Address (if different than mailing address): Los Alamos National Security LLC for TA-54 WEST, BLDG. 38, Los Alamos, MN

6. Transporter 1 Company Name: CAST SPECIALTY INC — U.S. EPA ID Number: COR000206722

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: USDOE in care of WIPP Nuclear Waste Partnership, 30 Miles SE of Carlsbad on Jal Highway, Carlsbad, NM 88221 USA — U.S. EPA ID Number: NM4890139088
Facility's Phone: 575-234-8125

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
X	1. RQ UN2916, Waste, Radioactive Material, Type B(U) Package, fissile excepted, 7, Am-241, Pu-239, Pu-240, 2.75E+00 TBq, Solid Oxide, Radioactive Yellow-II, TI= 0.4, USA/9218/B(U)F-96, TP 136	1	CM	1596	K	F001 F002 F005 D004 D005 D006
X	2. RQ UN2916, Waste, Radioactive Material, Type B(U) Package, fissile excepted, 7, Am-241, Pu-239, Pu-240, 2.592E+00 TBq, Solid Oxide, Radioactive Yellow-II, TI=0.4, USA/9218/B(U)F-96, TP-157	1	CM	1492	K	F001 F002 F005 D004 D005 D006
X	3. UN2908, Radioactive material, excepted package-empty packaging, 7, Dunnage, TP-203	1	CM	6279	K	
	4.					

14. Special Handling Instructions and Additional Information

Shipment# WC180001; ERG# 163, Tractor# C 43 Trailer# C378, Gross weight (KG)
TP# 136= 7586 KG,14-108544/LASB50097,14-108459/LASB50039 TP# 157=7294KG, 14-108543/LASB50042,
14-108525/LASB50016 TP-203=6279KG, 2 SWB- Dunnage

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Barbara Vogler — Signature: [signature] — Month 1 Day 5 Year 18

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Jose A. Brito III — Signature: [signature] — Month 1 Day 5 Year 18
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132	H132		

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a
Printed/Typed Name: [signature] — Signature: [signature] — Month 01 Day 05 Year 18

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: NM0890010515
2. Page 1 of 1
3. Emergency Response Phone: 505-667-5211
4. Manifest Tracking Number: 014974170 JJK

5. Generator's Name and Mailing Address: WCS on behalf of LANL on behalf of U S DOE, 9998W State HWY 176, Andrews, TX 79714
Generator's Phone: 432-525-8500

Generator's Site Address (if different than mailing address): Los Alamos National Security LLC for TA-54 WEST, BLDG. 35, Los Alamos, MN

6. Transporter 1 Company Name: CAST SPECIALTY INC
U.S. EPA ID Number: COR000206722

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: USDOE/in care of WIPP/Nuclear Waste Partnership, 30 Miles SE of Carlsbad on Jal Highway, Carlsbad, NM 88221 USA
U.S. EPA ID Number: NM4890139088
Facility's Phone: 575-234-8125

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ UN2916, Waste, Radioactive Material, Type B(U) Package, fissile excepted, 7, Am-241,Pu-238, Pu-239, 1.898E+00 TBq, Solid Oxide, Radioactive Yellow-II, TI= 0.4, USA/9218/B(U)F-96, TP-182	1	CM	1243	K	F001 F002 F005 D004 D005 D006
X	2. RQ UN2916, Waste, Radioactive Material, Type B(U) Package, fissile excepted, 7, Am-241, Pu-239, Pu-240 1.360E+00 TBq, Solid Oxide, Radioactive Yellow-II,TI=0.4, USA/9218/B(U)F-96, TP-198	1	CM	1195	K	F001 F002 F005 D004 D005 D006
X	3. UN2908, Radioactive material, excepted package-empty packaging, 7, TP-199	1	CM	5752	K	
	4.					

14. Special Handling Instructions and Additional Information

Shipment# WC180002; ERG# 163, Tractor# C 45 Trailer# C367, Gross weight (KG)
TP# 182- 6946 KG,14-108423/LA000000687622 14-108580/LA850065 TP# 198-6955KG, 14-108565/LA850054,
TP-199-5752KG, EMPTY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Isabella Vasler
Signature: [signature]
Month Day Year: 01 05 18

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: JAMES HAMPTON
Signature: James Hampton
Month Day Year: 01 05 18

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132	H132		

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: [illegible]
Signature: [illegible]
Month Day Year: 01 05 18

GENERATOR — TRANSPORTER — INT'L — DESIGNATED FACILITY

ENCLOSURE 3

NMED LETTER July 17 2014 Notice of Completion of Off-site Waste Shipment for Storage Pending Disposal

EPC-DO: 18-043

LA-UR: 18-21081

Date: FEB 14 2018

NEW MEXICO
ENVIRONMENT DEPARTMENT

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

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

July 17, 2014

Mr. Andrew Worker
STP Project Manager
Los Alamos Field Office
National Nuclear Safety Administration
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Ms. Monica Noll
STP Project Manager
Waste Management Programs (WM-PROG)
Los Alamos National Laboratory
P.O. Box 1663, MS-K996
Los Alamos, NM 87545

RE: NOTICE OF COMPLETION OF OFF-SITE WASTE SHIPMENT FOR STORAGE PENDING DISPOSAL, ACTIVITY 4.0, COMPLIANCE PLAN, SITE TREATMENT PLAN, FEDERAL FACILITY COMPLIANCE ORDER LOS ALAMOS NATIONAL LABORATORY EPA ID #NM0890010515 HWB-LANL-14-026

Dear Mr. Worker and Ms. Noll:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively, the Respondents) *Notice of Completion of Off-Site Waste Shipment for Storage Pending Disposal, Activity 4.0, Compliance Plan, Site Treatment Plan, Federal Facility Compliance Order, Los Alamos National Laboratory* dated May 14, 2014, and received May 15, 2014, and referenced by WM-DO-14-039 and LA-UR-14-23406.

NMED has reviewed shipment activity and enclosed manifest and has the following comment:

Comment:
On February 14, NMED received notice of a release at the Waste Isolation Pilot Plant (WIPP) nuclear waste repository. The DOE identified that drum 68660 experienced an energetic chemical reaction which ultimately led to the release of radioactive material. Drum 68660 is part

a nitrate salt waste stream identified as LA-MIN02-V.001. As stated in this manifest, approximately 153 containers from this waste stream were shipped to Waste Control Specialist, LLC, Texas (WCS) for temporary storage pending the reopening of WIPP between April 1-22, 2014.

As required by the NMED, the Permittees submitted the *Revised LANL Nitrate Salt-Bearing Waste Container Isolation Plan* on May 29, 2014, and the Permittees have begun to isolate all drums containing the associated nitrate salt-bearing waste stream (LA-MIN02-V.001). The Permittees report that these drums have been placed in standard waste boxes and are under continuous air and thermal monitoring (as of June 6, 2014).

The cause of the chemical reaction is still under investigation, and the need for additional remediation on these containers is unknown. In light of recent events, and the potential need to re-remediate all nitrate salt-bearing waste, NMED has determined that the removal of mixed transuranic waste (mixed-TRU) from the site treatment plan (STP) will be placed on hold until more information becomes available and it becomes clear that the waste currently stored at WCS will not be returned to LANL.

Please contact Siona Briley of my staff at (505) 476-6049 should you have any questions or concerns.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
T. Hall, NMED HWB
S. Briley, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
A. Dorries, ENV-DO

File: LANL, Site Treatment Plan 4.0, May 14, 2014 and
Fiscal Year 2014.