

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

National Nuclear Security Administration
Los Alamos Field Office
3747 West Jemez Road, MS A316
Los Alamos, New Mexico 87544
(505) 667-5794/Fax (505) 606-5948

Date: **MAR 07 2019**
Symbol: EPC-DO: 19-063
LA-UR: 19-21725

Locates Action No.: N/A

RETURN RECEIPT REQUESTED

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

Subject: Resubmittal of the Notice of Completion of Expedited Off-Site Waste Shipment Activity 3.3.4 (B and C), Compliance Plan, Site Treatment Plan, Federal Facility Compliance Order, Los Alamos National Laboratory

Dear Ms. Briley:

The purpose of this letter is to resubmit a notification sent to the New Mexico Environment Department (NMED) from Triad National Security, LLC, Los Alamos National Laboratory (LANL), regarding a notice of completion of required activities set forth in the Federal Facility Compliance Order (FFCO), Activity 3.3.4 (B) in the Compliance Plan (CP) of the Site Treatment Plan (STP). Activity 3.3.4 (C) requires that the U.S. Department of Energy (DOE) and LANL notify the NMED of the shipment of off-site waste included in the STP, and provide documentation of the receipt of the waste at an off-site treatment facility within 45 days of its receipt.

The initial notification, dated January 7, 2019 and referenced by EPC-DO:18-438 included notification of three shipments made during Fiscal Year 2017 (FY17).

1. May 23, 2017, LANL shipped one (1) container of 10-100 nCi/g waste (LA-W935) to Waste Control Specialist, LLC, Andrews, Texas.



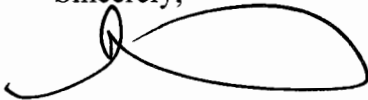
2. August 17, 2017, LANL shipped one (1) container of 10-100 nCi/g waste to Energy Solutions, LLC, Clive, Utah.
3. September 13, 2017, LANL shipped one (1) container of 10-100 nCi/g waste to Energy Solutions, LLC, Clive, Utah.

This notification is being resubmitted to incorporate changes to the document as suggested by the NMED and agreed upon in a telephone conference on January 24, 2019 by LANL. The changes to the document include changes to Table 1 (Enclosure 1) to include the deletion of "value-like fractions" in the "Number of Containers" column.

The NMED has also requested an explanation for the shipment notification exceeding the required 45 day notice. The reason for the exceedance is as follows: The shipping manifest were discovered while working on the FY17 STP report, submitted to NMED January 7, 2019. There was a MLLW shipment that had not been reported to NMED per the rules within the Federal Facility Compliance Order (FFCO). Therefore, LANL voluntarily disclosed this information to NMED in the above referenced letter.

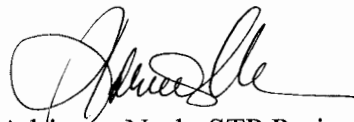
If you have further questions, please contact Avril Millensted at 505-665-3350, millensted@lanl.gov or Adrienne Nash at 505-665-5026, adrienne.nash@nnsa.doe.gov.

Sincerely,



Avril Millensted, STP Project Manager
Waste Management Program
Triad National Security, LLC
Los Alamos National Security

Sincerely,



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

AM/AN

- Enclosures (s): 1) Table 1. STP-Covered Mixed Low-Level Waste Shipments
2) Mixed Low-Level Waste Shipment Manifest

Copy: (w/enc. And electronic copy)

Laurie King, USEPA/Region 6, Dallas, TX, (E-File)
John Kieling, NMED-HWB, Santa Fe, NM (E-File)
Neelam Dhawan, NMED-HWB, Santa Fe, NM (E-File)
Siona Briley, NMED-HWB, Santa Fe, NM, (E-File)
William S. Goodrum, LASO-LA, (E-File)
Jody M. Pugh, LASO-LA, (E-File)
Karen E. Armijo, LASO-LA, (E-File)
Adrienne L. Nash, LASO-LA, (E-File)
Michael W. Hazen, ESHQSS, (E-File)

Enrique Torres, EPC-DO (E-File)
Peter H. Carson, EPC-WMP, (E-File)
Ellena Martinez, EPC-WMP, (E-File)
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Enclosure 1

Table 1. STP Covered Mixed Low-Level Waste Shipments

EPC-DO: 19-063

LA-UR-19-21725

Date: MAR 07 2019

Table 1. STP-Covered Mixed Low-Level Waste Shipments

STP/CP Section	MWIR Waste ID	Treatability Group	Off-site Facility	Manifest Number	Number of Containers	Container Numbers	Volume Removed from STP (m³)	MLLW Volume Shipped (m³)
3.3.4	LA-W935	<i>10-100 nCi/g Waste</i>	WCS	006641098FLE	1	W831601	0.208	0.208
3.3.4	LA-W935	<i>10-100 nCi/g Waste</i>	Energy Solutions, LLC	006649771FLE	1	W833447	0.3215	0.3215
3.3.4	LA-W935	<i>10-100 nCi/g Waste</i>	Energy Solutions, LLC	*006649706FLE	1	W836947	36.25	34.20
Total Volume							36.779	34.729

* Container #W836947 was repacked into a sealand container #W837670, as referenced in shipping manifest above.

Enclosure 2

**Mixed Low-Level
Waste Shipment Manifest**

EPC-DO: 19-063

LA-UR-19-21725

Date: MAR 07 2019

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NM0890010515	2. Page 1 of 2	3. Emergency Response Phone 505-567-6211	4. Manifest Tracking Number 006641038 FLE	
5. Generator's Name and Mailing Address ATTN: LORI MULLEN Los Alamos National Security LLC for USDOE P.O. Box 1663, MS H834 Los Alamos, NM 87545				Generator's Site Address (if different than mailing address) Los Alamos National Security LLC for USDOE Technical Area 54 - Area 1 Los Alamos, NM 87545		
6. Generator's Phone 505-567-6200				U.S. EPA ID Number CAT000624247		
7. Transporter 1 Company Name MP Environmental Services, Inc. (AZ)				U.S. EPA ID Number		
8. Designated Facility Name and Site Address Waste Control Specialists LLC TSD Facility 9999 Highway 176 West Andrews, TX 79714				U.S. EPA ID Number TXD988088464		
Facility's Phone: 4325258500						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
		No.	Type			
1	RD, UN3321, RADIOACTIVE MATERIAL, -LOW SPECIFIC ACTIVITY (LSA-II) FISSILE-EXCEPTED, 7, (PU-239, AM-241, PU-239), SOLID OXIDE, 2.352 05 720	1	CM	3443	K	
2	UN3321, WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSILE-EXCEPTED, 7, (AM-241, PU-239, PU-240), SOLID OXIDE, 4.052 05 720	1	DM	70	K	D001, D005, D006, D601, D606, D005
3	UN3321, WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSILE-EXCEPTED, 7, (PU-239, PU-240, AM-241, PU-241), SOLID OXIDE, 6.285 04 720	1	CM	633	K	D001, D006
4	UN3321, WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II) FISSILE-EXCEPTED, 7, (PU-239, PU-240, PU-241), SOLID OXIDE, 7.227 04 720	1	DM	95	K	D006
14. Special Handling Instructions and Additional Information 1.1 46462, W83321, 162 <i>2/2/2017</i> 1.2 43163, W831601, 162 1.3 39395, W834644, 162 1.4 36573, W872447, 162 <div style="text-align: right;">Exclusive Use Shipment</div>						
15. GENERATOR'S/CERTIFIER'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/Certifier's Printed/Typed Name: LORI MULLEN Signature: _____ Month: _____ Day: _____ Year: _____						
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: THAD WHITE Signature: <i>Thad White</i> Month: 5 Day: 23 Year: 17 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____						
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____ U.S. EPA ID Number: _____ 18b. Alternate Facility (for Generator) Facility's Phone: _____ 18c. Signature of Alternate Facility (for 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. _____						
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: _____ Month: _____ Day: _____ Year: _____						

GENERATOR

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NN0890010515	2. Page 1 of 1	3. Emergency Response Phone 505-667-6211	4. Manifest Tracking Number 006649771 FLE	
5. Generator's Name and Mailing Address LAHS LLC on behalf of USEDOE the U.S. Department of Energy SS 9/5/17 P.O. Box 1563, MS R834 Los Alamos, NM 87545						
6. Generator's Site Address (if different than mailing address) LAHS LLC on behalf of USEDOE the U.S. Department of Energy SS 9/5/17 Technical Area 54 - Area 6 Los Alamos, NM 87545						
7. Transporter 1 Company Name NP Environmental Services, Inc. (AZ)				U.S. DOT ID Number CAT000624247		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address Energy Solutions LLC Interstate 80, Exit 49 Clive, UT 84029 Facility's Phone: 4358840155				U.S. EPA ID Number UT0982598898		
9a. HAZ	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 Wt./Vol.	13. Waste Codes
	1 UN3321, WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II), 7, PU-239, AM-241, PU-240, PU-241, SOLID OXIDE, 1.65E-01 TBQ, PICTURE EXCEPTED	1 CM		3420	K	D004 D005 D006 D007 D008 D009
	2					
	3					
	4					
14. Special Handling Instructions and Additional Information 1.) 42822, W833447, 162 ES# 9334-03-0031						
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/Officer's Printed/Typed Name LORI SHELTON		Signature <i>Lori Shelton</i>		Month Day Year 11/13/17		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> 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 PAUL POLAND Signature <i>Paul Poland</i> Month Day Year 11/13/17 Transporter 2 Printed/Typed Name Signature Month Day Year						
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____						
18b. Alternate Facility (or Generator) Facility's Phone: _____ U.S. EPA ID Number: _____						
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.		5.		6.		
Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Typed Name: _____ Signature: _____ Month Day Year: _____						

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 006649706 FLE			
5. Generator's Name and Mailing Address ATTR: LORI SHELTON LANE LLC on behalf of WEDGE the U.S. P.O. Box 1663, MS R834 Los Alamos, NM 87545 Department of Energy SS 8/17/17		Generator's Site Address (if different than mailing address) LANE LLC on behalf of WEDGE the U.S. Technical Area 54 - Area G Los Alamos, NM 87545 Department of Energy SS 8/17/17						
6. Transporter 1 Company Name MP Environmental Services, Inc. (AZ)		U.S. EPA ID Number CAT000624247						
7. Transporter 2 Company Name		U.S. EPA ID Number						
8. Designated Facility Name and Site Address Energy Solutions LLC Interstate 80, Exit 49 Clive, UT 84029 Facility's Phone: 4358840155		U.S. EPA ID Number UT0902598898						
9a. HWM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes		
		No.	Type					
1	RO, UN3321, WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II), 7, PU-239, PU-240, AM-241, PU-241, SOLID OXIDE, 8.12E-01 TBQ, FISSILE EXCEPTED, (HS 2803);	1	CM	6908	K	D005	D006	D007
2	UN3321, WASTE RADIOACTIVE MATERIAL, LOW SPECIFIC ACTIVITY (LSA-II), 7, PU-239, PU-240, AM-241, PU-241, SOLID OXIDE, 1.57E-01 TBQ, FISSILE EXCEPTED	1	CM	481	K	D006	D007	D008
3						D009	D010	D011
4								
14. Special Handling Instructions and Additional Information 1.1 35717, W837670, 162 1.2 40905, W834859, 162 Exclusive Use shipment Line 1-9334-08-0002 1-9334-00-0002 SS 8/17/17 Line 2-9334-03-0030								
15. GENERATOR'S/EXPORTER'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/Exporter's Printed/Typed Name LORI SHELTON		Signature <i>Lori Shelton</i>				Month Day Year 8 17 17		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: Date leaving U.S.:								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name TUDIE HITE		Signature <i>Tudie Hite</i>				Month Day Year 8 17 17		
Transporter 2 Printed/Typed Name		Signature				Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:								
18b. Alternate Facility (for Generator) U.S. EPA ID Number								
Facility's Phone:								
18c. Signature of Alternate Facility (for 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.					
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				Month Day Year		

Edin Gar 8/17/17