

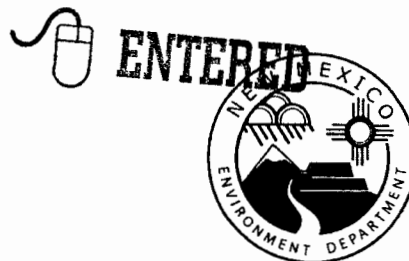


**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

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**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 9, 2019

Adrienne Nash  
STP Project Manager  
National Nuclear Safety Administration  
Los Alamos Field Office  
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Avril Millensted  
STP Project Manager  
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P.O. Box 1663, MS-M969  
Los Alamos, NM 87545

**RE: DISAPPROVAL  
RESUBMITTAL OF THE SITE TREATMENT PLAN, FISCAL YEAR 2017  
ANNUAL UPDATE AND PROPOSED REVISION 28.0, FEDERAL FACILITY  
COMPLIANCE ORDER, OCTOBER 4, 1995  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID#NM0890010515  
HWB-LANL-18-031**

Dear Ms. Nash and Ms. Millensted:

The New Mexico Environment Department (NMED) has received the U.S. Department of Energy (DOE), and Triad National Security, LLC (Triad), collectively referred to as the Respondents, *Resubmittal of Site Treatment Plan (STP), Fiscal Year 2017 Update and Proposed Revision 28.0, Federal Facility Compliance Order, October 4, 1995* (Resubmittal) dated and received March 7, 2019, and referenced by EPC-DO-19-068/LA-UR-19-21961.



NMED has completed its review of the Resubmittal and has the following comments.

**Comments**

**1. Part II, Section 6.1.1 and Table 6.1.1-1 (page 12)**

The waste activity number associated with this waste stream LA-W922 *Noncombustible Debris*, should be 3.1.5, and not 3.3.4. In addition, revise the text in Section 6.1.1 to be consistent with the information reported in Table 6.1.1-1 once it has been revised.

**2. Part III, Section 3.1.8, Table 3.1.8-2 (page 24)**

NMED approves of the proposed compliance date (September 30, 2021) for waste activity 3.1.8 (A).

**3. Part III, Section 3.3.4, Table 3.3.4-2 (page 29)**

NMED approves of the proposed compliance date (September 30, 2022) for waste activity 3.3.4 (A) and (B).

**4. Part III, Section 4.0, Table 4.0-1 (page 30)**

NMED has found the following inconsistencies between the Administrative Adjustment Volumes reported in Table 4.0 and Appendix E, Table E-1 for the following MTRU Treatability Groups, please review and resolve the inconsistencies:

**a. *Cemented Sludge***

Table 4.0-1 reports a volume of 0 m<sup>3</sup> but Attachment E, Table E-1 reports a volume of -82.25 m<sup>3</sup>.

**b. *Combustible-Noncombustible Waste***

Table 4.0-1 reports a volume of -66.906 m<sup>3</sup> but Attachment E, Table E-1 reports a volume of -186.503 m<sup>3</sup>.

**c. *Combustible Waste***

Table 4.0-1 reports a volume of -0.208 m<sup>3</sup> but Attachment E, Table E-1 reports a volume of -1.154 m<sup>3</sup>.

**d. *Metallic Waste***

Table 4.0-1 reports a volume of -0.208 m<sup>3</sup> but Attachment E, Table E-1 reports a volume of -2.101 m<sup>3</sup>.

**e. *Noncombustible Waste***

Table 4.0-1 reports a volume of -1.246 m<sup>3</sup> but Attachment E, Table E-1 reports a volume of -22.108 m<sup>3</sup>.

**f. *Solidified Inorganic and Organic Waste***

Table 4.0-1 reports a volume of 219.311 m<sup>3</sup> but Attachment E, Table E-1 reports a volume of 292.727 m<sup>3</sup>.

**5. Appendix A, Table A-1 (page 36)**

- a. NMED has found inconsistencies between the Administrative Adjustment Volume reported for waste activity 3.3.4, MWIR Waste ID: LA-W935, Treatability Group: *10-100nCi/g* in Tables A-1, C-1, and C-2. Table A-1 list an Administrative Adjustment volume of  $19.277 \text{ m}^3$ , but Table C-1 lists a Net Administrative Adjustment of  $19.278 \text{ m}^3$ , and Table C-2 list a Subtotal Total of  $21.545 \text{ m}^3$ . Please review and resolve the inconsistencies between tables.
- b. NMED notes that the MLLW Treatability Group 3.3.4 LA-395 *10-100nCi/g* for FY16 Annual Update Volume reported ( $59.927 \text{ m}^3$ ) is inconsistent with the volume previously reported in STP Revision 27.0 for FY2016 ( $57.410 \text{ m}^3$ ) and is inconsistent with the volume which was previously reported to NMED in the October submittal of this STP ( $57.410 \text{ m}^3$ ). Please review this waste volume ( $59.927 \text{ m}^3$ ) and ensure that is consistent with the volume previously reported to NMED for FY2016.
- c. It is unclear from the values provided for MLLW Treatability Group 3.3.4 LA-395 *10-100nCi/g* how the FY17 Annual Update volume of  $170.426 \text{ m}^3$  was calculated. NMED calculate the value to be  $172.9426 \text{ m}^3$  (i.e.,  $59.927 + 19.277 + 36.7795 + 105.0781 - 48.119$ ). Please resolve the discrepancy.

**6. Appendix D, Table D-1 (page 40)**

NMED notes that the FY16 Annual Update volume reported for waste activity 3.2 MWIR Waste Id LA-W394 *High Activity Waste* ( $1.477 \text{ m}^3$ ) is inconsistent with the volume previously reported in STP Revision 27.0 for FY2016 for *FY2015 Annual Update* ( $1.301 \text{ m}^3$ ) and is inconsistent from the volume which has been previously reported to NMED in the October submittal of this STP for FY2017 ( $1.301 \text{ m}^3$ ). Please review this waste volume ( $1.477 \text{ m}^3$ ) and ensure that is consistent with the volume previously reported to NMED for FY2016.

**7. Appendix E, Table E-2 (page 45)**

NMED has found an inconsistency between the *Combustible-Noncombustible Waste from CMR* Volumes reported in Part II, Table 6.1.2-1, and Appendix E, Table E-2 for the MTRU Treatability Group *Combustible-Noncombustible Waste* located at the Chemistry and Metallurgy Research (CMR) Building. Table 6.1.2-1 lists a total volume of 12.499 (i.e.,  $4.164 + 8.335$ ), but Table E-2 lists a volume of 22.0197, please resolve the inconsistency.

**8. Appendix G, Table G-1 (page 49)**

It is unclear from the values provided in this table how the Total Net TA-54 Adjustment volume of  $756.077 \text{ m}^3$  was calculated. NMED has calculated the value to be  $378.037 \text{ m}^3$  (i.e.,  $-82.25 - 186.503 - 1.154 - 2.517 - 22.108 + 672.569$ ). Please resolve the discrepancy.

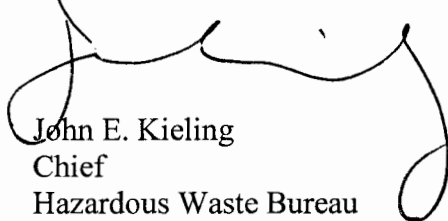
Ms. Nash and Ms. Millensted  
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Page 4

NMED hereby issues this Disapproval. The Respondents must submit a revised document that incorporates the comments listed above, to NMED by May 9, 2019.

The Respondents must submit two hard copies, and an electronic copy of the revised document. In addition, the Respondents must include an electronic redline-strikeout version that indicates where all the revisions have been made.

If you have any questions regarding this letter, please contact Siona Briley at (505) 476-6049.

Sincerely,



John E. Kielsing  
Chief  
Hazardous Waste Bureau

cc:

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File: 2019 LANL, NOD Letter Resubmittal of Site Treatment Plan, Fiscal Year 2017 Annual Update and Proposed Revision  
LANL-18-031