

SNL 07



National Nuclear Security Administration  
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MAR 15 2007

Mr. John E. Kieling  
Manager  
Permits Management Program  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. East, Bldg. 1  
Santa Fe, New Mexico 87505



Subject: Quantities of Hazardous Waste Managed at Hazardous Waste Management Facility in 2006, Department of Energy (DOE)/Sandia Corporation (Sandia)/Sandia National Laboratories/New Mexico (SNL/NM), Permit No. NM5890110518-1

Dear Mr. Kieling:

On behalf of the Department of Energy and Sandia, DOE is providing information regarding quantities of hazardous waste managed during calendar year 2006 at the Hazardous Waste Management Facility (HWMF) at SNL/NM.

Permit Condition III.G.2 requires that DOE and Sandia submit a report to the New Mexico Environmental Department explaining the situation for any waste code whose quantity managed in a calendar year exceeded the estimated annual quantity listed in Permit Attachment G (Part A of the permit application).

During 2006 four managed wastes were in exceedance of their respective quantities listed on the individual lines in the Part A. The excess quantities of the four wastes were generated during one-time activities. The total quantity of waste managed at the HWMF during 2006 was less than 15 percent of the total quantity shown on the Part A. The estimated annual quantity shown on the Part A is 594,925 kilograms (kg); 72,314 kg were handled during 2006. All the wastes that exceeded their respective quantities are discussed in Tables 1 and 2.

In summation, since all of the wastes discussed in the tables were generated through one-time activities, these wastes are not expected to be routinely generated in quantities exceeding the Part A listed amounts. Therefore, DOE and Sandia are not revising the Part A at this time. DOE and Sandia will continue to monitor quantities of hazardous wastes managed at the HWMF, and will submit a request for modification in the future if it becomes necessary, in compliance with Permit Condition III.G.2.

Please note that DOE and Sandia continue to comply with the maximum storage capacity limits of Permit Conditions III.B and III.C.



John Kieling

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As required by Section I. F. of the Permit and in accordance with 40 CFR 270.11 and 270.30(k), a signed certification is enclosed. DOE and Sandia are available to provide additional information as needed. If you have any questions regarding this submittal, please contact David Rast, of my staff, at (505) 845-5349.

Sincerely,

  
Patty Wagner  
Manager

Enclosure (3)

cc:

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D. Rast, SSO

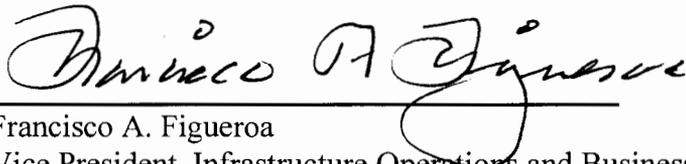
M. Reynolds, SSO

SSO Legal File

Annual Part A Report for Calendar Year 2006  
NMED Permit No. NM5890110518-1

CERTIFICATION STATEMENT

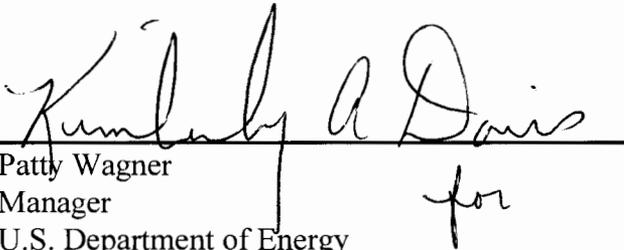
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



Francisco A. Figueroa  
Vice President, Infrastructure Operations and Business Management  
Chief Financial Officer  
Sandia Corporation  
Albuquerque, New Mexico  
Co-Operator

3/1/07

Date signed



Patty Wagner  
Manager  
U.S. Department of Energy  
National Nuclear Security Administration  
Sandia Site Office  
Owner and Co-Operator

3/14/07

Date signed

**Table 1. 2006 Waste Quantities that Exceeded Estimated Annual Quantity in Part A Form  
Permit No. NM5890110518-1**

1. Waste code(s)	2. Line in Part A form	3. Estimated annual quantity in Part A, kg	4. Description	5. Activities generating waste	6. Total quantity generated during 2006, kg <sup>1</sup>	7. Exceedance, kg	8. Quantity generated by one-time activities, kg <sup>2,3</sup>	9. Line(s) in Table 2 <sup>4</sup>
D008	31	17,000	Scrap lead metal	Various	17,389	389	5,291	1
D038	62	100	Spent solvents and reagents	Various	117	17	17	2
U098	298	10	1,1-dimethylhydrazine	Various	14	4	14	3
U125	323	10	Furfural	Various	27	17	22	4

**NOTES FOR TABLE 1**

- 1 The quantity shown in Column 6 includes all the wastes generated at SNL/NM that have the waste code(s) listed in Column 1 that are not accounted for in any other line of the Part A form. Many of the wastes that are included in this quantity have multiple waste codes. Each of these wastes is considered with respect to each waste code in reaching the total quantities shown in Column 6. See example below.
- 2 Selected quantities of one-time wastes generated at SNL/NM are included in this total quantity shown in Column 8. Most of these one-time wastes have multiple waste codes (see note 1). Each of these wastes is considered with respect to each waste code in reaching the total quantities shown. Only one-time wastes are shown in this column. See example below.
- 3 Small quantities of numerous one-time wastes were generated at SNL/NM during 2006. For simplicity, only the wastes that contributed to exceedance of the Part A estimated annual quantities are considered and shown in Tables 1 and 2.
- 4 The individual one-time wastes that contribute to the total quantity in Column 6 are listed in Table 2. See example below.

## EXAMPLE

- Lead and lead-containing wastes (D008) generated by all Sandia operations are included on Line 31 of the Part A form (Attachment G to permit NM5890110518-1). The estimated annual quantity is 17,000 kilograms (kg), as shown in Column 3.
- The total quantity of D008 wastes generated during 2006 was 17,389 kg, as shown in Column 6 on Table 1. This quantity exceeded the estimated annual quantity in Line 31 by 389 kg, as shown in Column 7.
- Column 8 shows that 5,291 kg of one-time D008 wastes were generated in 2006 (see notes 2 and 3 above). Note that this quantity exceeds the quantity in Column 7.
- Therefore the D008 exceedance in 2006 is due entirely to one-time waste-generating activities. These one-time wastes and generating activities are summarized in Table 2.
- The line in Table 2 that describes large-quantity lead-containing wastes is listed in Column 9: line 1. The waste consists of lead metal that is not suitable for recycling and is no longer needed for operations at SNL/NM.

**Table 2. Details Regarding 2006 Wastes Reported in Table 1  
Permit No. NM5890110518-1**

<b>Line no.</b>	<b>Waste code(s)</b>	<b>Description of waste</b>	<b>Activity generating waste</b>	<b>Quantity generated, kg</b>	<b>One-time activity?</b>
1	D008	Scrap lead metal	Scrap lead that is not suitable for recycling and is no longer needed for SNL/NM activities	5,291	yes
2	D001, D038, F003, F005	Spent solvents and reagents	Mixture of several spent solvents and reagents from research and chemical analyses	17	yes
3	D001, D002, U098	1,1-dimethylhydrazine	Chemical that is no longer needed and is not suitable for recycling	14	yes
4	D001, U125	Furfural	Chemical that is no longer needed and is not suitable for recycling	22	yes