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

Subject: Quantities of Hazardous Waste Managed at Hazardous Waste Management Facility in 2007, US Department of Energy / Sandia Corporation / Sandia National Laboratories/New Mexico, Permit No. NM5890110518-1

Dear Mr. Kieling:

On behalf of the Department of Energy (DOE) and Sandia Corporation (Sandia), DOE is providing information regarding quantities of hazardous waste managed during calendar year 2007 at the Hazardous Waste Management Facility (HWMF) at Sandia National Laboratories.

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

During 2007, two managed wastes were in exceedance of their respective quantities listed on the individual lines in the Part A. The excess quantities of each waste were generated during one-time activities. The total quantity of waste managed at the HWMF during 2007 was less than 10 percent of the total quantity shown on the Part A. The estimated annual quantity shown on the Part A is 594,925 kilograms (kg); 52,911 kg were handled during 2007. 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.
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,

Kimberly A. Davis
Patty Wagner
Manager

cc:
W. Moats, NMED HWB
T. Skibitski, NMED DOE OB, HWB
D. Rast, DOE/SSO
M. Reynolds, DOE/SSO
SSO Legal File
M. Hazen, SNL/NM, Org. 4000, MS-0143
A. Blumberg, SNL/NM, Org. 11100, MS-0141
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R. Brandhuber, SNL/NM, Org. 4130, MS-1037
T. Cooper, SNL/NM, Org. 4133, MS-1042
J. Thompson, SNL/NM, Org. 4139, MS-1151
A. Reiser, SNL/NM, Org. 4133, MS-1042
L. Spangler, SNL/NM, Org. 4139, MS-1117
SNL ES&H Record Center, SNL/NM, Org 9532, MS-0651
Annual Part A Report for Calendar Year 2007
NMED Permit No. NMS90110518-1

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.

Michael W. Hazen, Vice President
Sandia Corporation
Albuquerque, New Mexico
Co-Operator

3 May 2008
Date signed

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

3/20/08
Date signed
### Table 1. 2007 Waste Quantities that Exceeded Estimated Annual Quantity in Part A Form

Permit No. NM5890110518-1

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>D038</td>
<td>62</td>
<td>100</td>
<td>Spent solvents and reagents</td>
<td>Various</td>
<td>101</td>
<td>1</td>
<td>8</td>
<td>1</td>
</tr>
<tr>
<td>U098</td>
<td>298</td>
<td>10</td>
<td>1,1-dimethylhydrazine</td>
<td>Various</td>
<td>12</td>
<td>2</td>
<td>12</td>
<td>2</td>
</tr>
</tbody>
</table>

### 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. All 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 2007. 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 quantities in Column 8 are listed in Table 2. See example below.
EXAMPLE

- Pyridine and pyridine-containing wastes (D038) generated by all Sandia operations are included on Line 62 of the Part A form (Attachment G to permit NM5890110518-1). The estimated annual quantity is 100 kilograms (kg), as shown in Column 3.

- The total quantity of D038 wastes generated during 2007 was 101 kg, as shown in Column 6 on Table 1. This quantity exceeded the estimated annual quantity in Line 62 by 1 kg, as shown in Column 7.

- Column 8 shows that 8 kg of one-time D038 wastes were generated in 2007 (see notes 2 and 3 above). Note that this quantity exceeds the quantity in Column 7.

- Therefore the D038 exceedance in 2007 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 the one-time pyridine-containing wastes is listed in Column 9: line 1. As detailed in Line 1 of Table 2, the waste consists of filters, gloves, and other solid waste contaminated with silver and various spent solvents including pyridine.

<table>
<thead>
<tr>
<th>Line no.</th>
<th>Waste code(s)</th>
<th>Description of waste</th>
<th>Activity generating waste</th>
<th>Quantity generated, kg</th>
<th>One-time activity?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>D011, D038, F005</td>
<td>Filters, gloves, and other solid waste contaminated with silver and various spent solvents</td>
<td>Research and chemical analyses</td>
<td>8</td>
<td>yes</td>
</tr>
<tr>
<td>3</td>
<td>D001, D002, U098</td>
<td>1,1-dimethylhydrazine</td>
<td>Chemical that is no longer needed and is not suitable for recycling</td>
<td>12</td>
<td>yes</td>
</tr>
</tbody>
</table>