



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Monday, December 02, 2013 9:27 AM
To: Allen, Pam, NMENV
Subject: FW: Approval of LANL MTRU Shipments to INL
Attachments: INL Shipment Approval Letter.pdf; Tim Hall 13-0082 FFCO-STP Noncommercial_Supplemental Info.pdf; Tim Hall 13-0080 FFCO-STP Noncommercial Shipment.pdf

Email and attachments for WIPP file.

From: Hall, Timothy, NMENV
Sent: Wednesday, November 20, 2013 8:21 AM
To: Kliphuis, Trais, NMENV; Holmes, Steve, NMENV; Maestas, Ricardo, NMENV; Smith, Coleman, NMENV
Subject: FW: Approval of LANL MTRU Shipments to INL

FYI... I also attached the letters from LANL requesting these shipments. I believe the first shipment is scheduled for today.

From: Hall, Timothy, NMENV
Sent: Wednesday, November 20, 2013 8:17 AM
To: Noll, Monica D (mdn@lanl.gov); Worker, Andrew (andrew.worker@nnsa.doe.gov)
Cc: Blaine, Tom, NMENV; Cobrain, Dave, NMENV; Briley, Siona, NMENV; Yanicak, Steve, NMENV; Bishop, M. Lee <Lee.Bishop@nnsa.doe.gov> (Lee.Bishop@nnsa.doe.gov); adorries@lanl.gov; Haagenstad, Mark P (mph@lanl.gov); king.laurie@epa.gov; 'susan.burke@deq.idaho.gov'; Kieling, John, NMENV
Subject: Approval of LANL MTRU Shipments to INL

Attached is the letter that went out in the mail yesterday. Please contact me with any questions.

Tim

SCANNED





SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO ENVIRONMENT DEPARTMENT **ENTERED**

Hazardous Waste Bureau

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



RYAN FYLNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

TOM BLAINE, P.E.
Director
Environmental Health Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 19, 2013

Mr. Andrew Worker
National Security Missions
Los Alamos Site Office
National Nuclear Safety Administration
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Ms. Monica Noll
Waste Management Generator Service Group
Waste Management Division
Los Alamos National Laboratory
P.O. Box 1663, MS-K996
Los Alamos, NM 87545

**RE: APPROVAL
SHIPMENT OF LOS ALAMOS NATIONAL LABORATORY (LANL) SITE
TREATMENT PLAN (STP) COVERED WASTE OFFSITE FOR TREATMENT
AND REPACKAGING AT IDAHO NATIONAL LABORATORY (INL)
EPA ID #NM0890010515**

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) request for approval to ship 18 containers of Site Treatment Plan (STP) covered mixed transuranic (MTRU) waste to Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Plant (AMWTP) for treatment, dated November 19, 2013, referenced as WM-DO-13-0082.

The Respondents are requesting approval to ship 18 corrugated metal boxes of STP-covered MTRU waste that are also part of the 3,706 cubic meters referenced in the January 2012 Framework Agreement. The request also indicates that some of the 18 containers may be shipped directly from LANL to the Waste Isolation Pilot Plant (WIPP). In a November 15, 2013 email the Respondents confirmed that; 1) any of the 18 containers that are shipped to INL will be shipped directly from INL to WIPP for disposal once treatment is completed; 2) no residual or newly generated waste will return



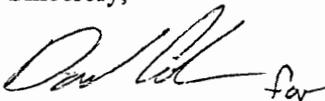
Mr. Worker and Ms. Noll
November 19, 2013
Page 2

to LANL; and 3) Respondents will remove the waste from the STP inventory once it has been shipped to INL. NMED hereby approves this request with these three conditions.

NMED also acknowledges the Respondents' commitment to send a weekly email update on the progress until all 18 containers have been shipped offsite. The update may be emailed to NMED's LANL STP Project Manager, Tim Hall, at timothy.hall@state.nm.us.

Please contact Tim Hall of my staff at (505) 222-9555 should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling" with a stylized flourish at the end.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: T. Blaine, NMED EHD
D. Cobrain, NMED HWB
T. Hall, NMED HWB
S. Briley, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
M. Bishop, LASO-EO, A316
A. Dorries, ENV-DO
M. Haagenstad, WM-PROG
L. King, EPA 6 PD-N
S. Burke, IDEQ

File: LANL, Site Treatment Plan FY 2013



Waste Management Division

P.O. Box 1663, Mail Stop K499
Los Alamos, New Mexico 87545
(505) 667-4873/Fax:(505) 667-9201

National Nuclear Security Administration

Los Alamos Field Office, A316
Los Alamos, New Mexico 87545
(505) 667-7203/Fax (505) 665-4504

Date: **NOV 19 2013**

Refer To: WM-DO-13-0082

HAND-DELIVERED

Mr. Timothy Hall, STP Project Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Notification of Activity 4.0 Waste Shipment Offsite for Treatment or Recycling at a Noncommercial Facility – Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO) Site Treatment Plan (STP) Compliance Milestones and Activities – Supplemental Information

Dear Mr. Hall:

The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively the Permittees) request approval from New Mexico Environment Department – Hazardous Waste Bureau (NMED-HWB) regarding Activity 4.0 mixed waste to be sent to a noncommercial facility.

Below is the list of 18 Corrugated Metal Boxes that LANL is requesting approval to send to Idaho National Laboratory (INL) for treatment. These containers are covered by the STP. These containers are also part of the 3706 Campaign. LANS is currently working on alternative approaches for some of these containers that would allow direct shipment from LANL to WIPP. The disposition status of all containers will be provided to you, weekly, in an email including shipment date and disposition path (i.e. INL or direct to WIPP).

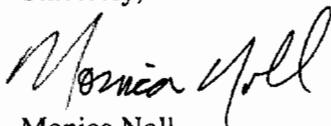
Count	Package ID
1	52301
2	53878
3	53882
4	53883
5	53884
6	53889
7	53892
8	53893
9	53898
10	54202
11	54203
12	54204
13	54206
14	54207
15	54208
16	54212
17	54213
18	54214

LANL will follow the process for deletion of covered waste in Section IX of the Federal Facility Compliance Order. LANL anticipates that it will request deletion of this waste from the STP as part of the normal STP Annual Update process for FY14. LANL will also provide documentation to NMED of receipt of waste at INL within 45 working days of receipt.

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, that, to the best of our knowledge and belief, the information in this document is true, accurate, and complete.

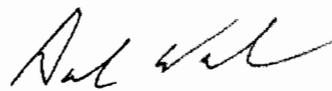
If you have any questions, please contact Monica Noll at (505) 667-5999 or Andrew Worker at (505) 606-0787.

Sincerely,



Monica Noll
Waste Management Programs (WM-PROG)
Los Alamos National Security, LLC

Sincerely,



Andrew Worker
Los Alamos Field Office
U.S. Department of Energy

Mr. Timothy Hall
WM-DO-13-0082

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National Nuclear Security Administration

MDN:AW

Cy: John E. Keiling, NMED/HWB, Santa Fe, NM, (E-File)
George C. Henckel III, NA-OO-LA, (E-File)
Andrew Worker, NA-OO-LA, (E-File)
Carl A. Beard, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Kathryn W. Johns-Hughes, LTP, (E-File)
Victoria A. George, REG-DO, (E-File)
Mike J. Romero, LTP-OCP, (E-File)
Robert L. Dodge, WM-DO, (E-File)
Mark P. Haagenstad, WM-PROG, (E-File)
Michelle L. Coriz, WM-PROG, (E-File)
Monica D. Noll, WM-PROG, (E-File)
Susan L. McMichael, LC-LESH, (E-File)
LASOmailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
WM-DO Correspondence File, K499



Waste Management Division

P.O. Box 1663, Mail Stop K499
Los Alamos, New Mexico 87545
(505)667-4873/Fax:(505)-667-9201

National Nuclear Security Administration

Los Alamos Field Office, A316
Los Alamos, New Mexico 87545
(505) 667-7203/Fax (505) 665-4504

NOV 14 2013

Date: ~~NOV 4 1 2013~~ *mv*

Refer To: WM-DO-13-0080

HAND-DELIVERED

Mr. Timothy Hall
New Mexico Environment Department
Albuquerque (District Office)
5500 San Antonio Dr., NE
Albuquerque, NM 87109

Subject: Notification of Activity 4.0 Waste Shipment Offsite for Treatment or Recycling at a Noncommercial Facility – Los Alamos National Laboratory (LANL) Federal Facility Compliance Order (FFCO) Site Treatment Plan (STP) Compliance Milestones and Activities

Dear Mr. Hall:

The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively the Permittees) submit this letter in the requirements in Sections 2.3 of the Compliance Plan Volume of the FFCO Site Treatment Plan. This letter provides written notice and request necessary approval from New Mexico Environment Department – Hazardous Waste Bureau (NMED-HWB) regarding Activity 4.0 mixed waste to be sent to a noncommercial facility.

There is a population of 18 corrugated metal boxes (CMBs) that have the potential to go to INL for TRU waste remote handling and repackaging with final disposition at WIPP. These containers are part of the 3706 m3 project framework agreement with the state of New Mexico and DOE. The waste in the CMBs were packaged at WCRRF in the early 1980s/late 1990s in a large hot cell. The waste consists of gloveboxes that were size-reduced with plasma arc cutting techniques and bagged-out in a liner bag into CMB containers. The waste contains lead, thus the D008 EPA code has been assigned. Additionally, there are 7 CMBs containing punctured, dry spray paint aerosol cans that were used to apply a contamination fixative during D&D operations. These aerosol cans have been assigned a D001 EPA code.

The CMB container is a Type 7A container that was designed to be placed in a WIPP TRUPACT I container, which never became certified for use. Thus, the CMB is not certified to go to WIPP in its current configuration, so the waste must be repackaged before it can be sent to WIPP. At TA-54,

Mr. Timothy Hall
WM-DO-13-0080

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we currently have two box lines for processing TRU waste. This is a hands-on process utilizing workers performing size reduction with small hand tools and decontamination when desirable. However, the wastes in the CMBs possess unique hazards due to the sharp edges and heavy metallic waste (e.g. glovebox pieces), as well as a contamination hazard due to the nature of dispersability of the contamination during cutting. Such contamination hazards will require special respiratory protection (e.g. supplied air), which the LANL box lines are not conjured to provide, based on their design. Therefore, LANL must send the CMBs off-site to be repackaged before they can be sent to WIPP.

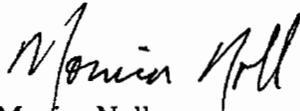
The INL Advanced Mixed Waste Treatment Plant is the desired receiving facility for this work. It has a 300 million dollar state of the art repackaging facility that uses robotic equipment to size-reduce metallic waste in a hot cell. As required by STP-CPV Table 2.3-2, item C, LANL should provide confirmation of the first shipment date within 14 days prior to making the first shipment. However, it is LANL's desire to ship the CMBs from LANL to INL in a 10-160B type Cask starting November 18, 2013. One shipment per week is planned to go to INL AMWTP, excluding holidays. LANL will follow all regulatory requirements for off-site shipment (item B); provided documentation to NMED of receipt of waste at INL within 45 working days of receipt (item D); meet all regulatory requirements applicable to any returned residues (item E); and provide documentation to NMED of receipt of any returned waste or residues at LANL within 45 working days of receipt (item F).

Notifications to address any state issues or concerns with this waste stream have already been made in August 2013, pursuant to the Western Governors Association Members protocols.

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, that, 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 Monica Noll at (505) 667-5999 or Andrew Worker at (505) 606-0787.

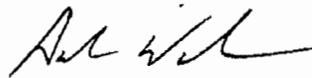
Sincerely,



Monica Noll
Waste Management Programs (WM-PROG)
Los Alamos National Security, LLC

MDN:AW

Sincerely,



Andrew Worker
Los Alamos Field Office
U.S. Department of Energy
National Nuclear Security Administration

Cy: John E. Keiling, NMED/HWB, Santa Fe, NM, w/enc.
George C. Henckel III, LA Field Office, w/enc., A316
Andrew Worker, LA Field Office, w/enc., A316

Mr. Timothy Hall
WM-DO-13-0080

- 2 -

Carl A. Beard, PADOPS, w/o enc., A102
Michael T. Brandt, AD-ESHQ, w/o enc., (E-File)
Kathryn W. Johns-Hughes, WDP-DO, w/o enc., (E-File)
Davis V. Christensen, WDP-DO, w/o enc., (E-File)
Susan L. McMichael, LC-LESH, w/o enc., (E-File)
Robert L. Dodge, WM-DO, w/o enc., (E-File)
Mark P. Haagenstad, WM-PROG, w/o enc., (E-File)
Michelle L. Coriz, WM-PROG, w/o enc., (E-File)
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LASOmailbox@nnsa.doe.gov, w/enc., (E-File)
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