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Environmental Protection Division

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National Nuclear Security Administration

Los Alamos Site Office, MS A316
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Los Alamos, New Mexico 87544
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Date: April 18, 2008
Refer To: ENV-RCRA-08-077

Mr. James P. Bearzi
Chief Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87501-6303

Dear Mr. Bearzi:

SUBJECT: RESPONSE TO NEW MEXICO ENVIRONMENT DEPARTMENT NOTICE OF DISAPPROVAL OF LOS ALAMOS NATIONAL LABORATORY (LANL) SITE TREATMENT PLAN (STP) MIXED TRU WASTE TRACKING, JANUARY 28, 2008, (HWB-LANL-07-019), DATED MARCH 5, 2008

The purpose of this letter is to respond to the comments provided by New Mexico Environment Department (NMED) in the above-referenced Notice of Disapproval, dated March 5, 2008, to the National Nuclear Security Administration and Los Alamos National Security, LLC (NNSA/LANS). NNSA/LANS are pleased to provide NMED its plan to fulfill the requirements set forth in the Site Treatment Plan (STP) for Mixed Transuranic (MTRU) waste sent to the Waste Isolation Pilot Plant (WIPP).

NNSA/LANS will submit quarterly reports to NMED throughout LANL's fiscal year on the Covered STP MTRU waste shipped to WIPP according to the schedule in the following table:

Quarterly Report	Quarterly Period	Date Submitted to NMED
1 st Quarterly Report	October 1 - December-31	No later than 45 days after the last day of the Quarterly period
2 nd Quarterly Report	January 1 - March 31	No later than 45 days after the last day of the Quarterly period
3 rd Quarterly Report	April 1 - July 31	No later than 45 days after the last day of the Quarterly period
4 th Quarterly Report	August 1 - September 30	No later than 45 days after the last day of the Quarterly period

Each quarterly report generated under the MTRU plan will account for, track, and verify STP Covered MTRU waste shipped off-site to WIPP as requested in the referenced NMED Notice of Disapproval. The data provided in the quarterly reports will allow NMED to accurately identify the MTRU waste quantities covered in the STP. The data will provide NMED the information necessary to track the STP MTRU waste volumes shipped to WIPP by shipment manifest, treatability group, and/or Acceptable Knowledge (AK) group.

Each quarterly report will provide the following details for each MTRU STP Covered drum sent to WIPP from LANL: (a) STP section, (b) generator AK alpha/numeric identification number, (c) WIPP Waste Stream number I.D. (d) treatability group I.D., (e) WIPP TRU waste shipment manifest number, (f) drum/container I.D. number, (g) volume shipped in cubic meters, and (h) date shipped (see Attachment A). The quarterly report will include a paper copy of the tabular data as well as a CD with the same data in a spreadsheet file. The tables provided in the quarterly reports will be organized by Treatability Group (i.e., cemented process sludge, combined combustible and non-combustible waste, combustible waste, leaded glove box gloves, metallic waste, and non-combustible waste). See Attachment A as an example of the Quarterly Report. As part of the process to improve reporting of STP waste, NNSA/LANS have modified its TRU database to identify the containers covered under the STP. As agreed with Ms. Rebecca Kay of your staff, the first report submitted will be for the 3rd quarter of fiscal year 2008 (April 1, 2008 to June 30, 2008) and the report will be delivered on or before August 14, 2008.

The STP Annual Update, Background Volume will provide a synopsis of the prior fiscal year's MTRU waste shipments to WIPP as specified in the quarterly reports. This Background Volume will include all Covered MTRU waste at LANL. See Attachment B as an example of the revised STP Update Background Volume Table 2.2-2.

The quarterly reports and the incorporation of Table 2.2-2 to the STP Annual Update will provide the information requested by NMED under the Federal Facilities Compliance Order and will allow NMED to verify the inventory LANL reports throughout the fiscal year. The information in the plan will provide the traceability and verifiability necessary for NMED to trace the amount of STP Covered MTRU waste shipped by NNSA/LANS to WIPP and reported in the STP.

If you have any questions, please call Albert Dye at 667-4715.

Sincerely,



Albert Dye
STP Project Manager
Water Quality & RCRA Group
Los Alamos National Laboratory



Gene Turner
Environmental Operations
Los Alamos Site Office

AD:GT/lm

Enclosure: a/s

Cy: James Bearzi, NMED/HWB, Santa Fe, NM, w/enc.
Gene Turner, LASO, A316, w/enc.
Michael B. Mallory, PADOPS, w/o enc., A102
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Gerald O'Leary, WDP-DO, w/o enc., J591
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Ellen Louderbough, LC-LESH, w/o enc., A187
ENV-RCRA, File, w/enc., K490
IRM-RMMSO, w/enc., A150

**Attachment A
EXAMPLE ONLY**

*Environmental Protection Division
Water Quality & RCRA Group (ENV-RCRA)*
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date:
Refer To:

Ms. Rebecca Kay
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Ms. Kay:

**SUBJECT: NOTICE OF COMPLETION OF OFF-SITE WASTE SHIPMENT
ACTIVITY 4.0 IN THE COMPLIANCE PLAN VOLUME (CPV),
SITE TREATMENT PLAN (STP), LOS ALAMOS NATIONAL
LABORATORY (LANL)**

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of completion of required activities set forth in the Federal Facility Compliance Order (FFCO).

Listed below is the Quarterly Report of STP Covered MTRU waste that was sent to WIPP during the first quarter of FY08. The volume of STP waste was shipped by treatability group. The total volumes shipped are indicated in the following table:

Table 1. Total Volume of MTRU waste shipped to WIPP by Treatability Group

STP Section	Treatability Group	Volume Shipped (m ³)
4.0	CEMENTED PROCESS SLUDGE	69.86
4.0	COMBINED COMBUSTIBLE AND NON-COMBUSTIBLE WASTE	11.23
4.0	COMBUSTIBLE WASTE	9.57
4.0	LEADED GLOVEBOX GLOVES	0.21
4.0	METALLIC WASTE	0.62
4.0	NON-COMBUSTIBLE WASTE	0.21
Total MTRU Waste Volume Shipped		91.7

**Table 2. Volumes of STP Covered MTRU Waste Shipped to WIPP by
Treatability Group.**

STP Section	Generator Acceptable Knowledge #	WIPP Waste Stream #	Treatability Group	Shipping Manifest Number	Container Number	Volume Shipped (m ³)	Date Shipped
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511419JJK	S79429127	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511419JJK	S79429129	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511419JJK	S79429130	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511419JJK	S79429131	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511419JJK	S79429132	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511420JJK	S79429124	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511420JJK	S79429126	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511421JJK	S79429111	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511421JJK	S79429114	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511421JJK	S79429128	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511422JJK	S79429112	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511422JJK	S79429116	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511422JJK	S79429119	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511422JJK	S79429120	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511422JJK	S79429121	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD03.001	Cemented Sludge	001511422JJK	S79429123	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511423JJK	S79429101	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511423JJK	S79429102	0.208	4/1/2008
4.0	CCP-AK-LANL-6	LA-MHD01.001	Cemented Sludge	001511423JJK	S79429118	0.208	4/1/2008

Documentation that waste was received at the aforementioned facility is provided in Table 2 above. Also included as Enclosure A is a Certification Statement prepared in accordance with the requirements of Section XX, "Documents, Information, and Reporting Requirements;" of the FFCO.

Please contact me at (505) 667-4715 or by email at dyea@lanl.gov if you have any questions.

**Attachment B
EXAMPLE ONLY**

FY07 Annual STP Update Background Volume Table

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY06-FY10 (m3)
Cemented Sludge	1684	-25.9	Reclassified as MLL waste	1547	
	-2.912	Shipped to WIPP 10/11/06			
	-1.456	Shipped to WIPP 10/13/06			
	-1.04	Shipped to WIPP 11/01/06			
	-2.912	Shipped to WIPP 11/30/06			
	-1.456	Shipped to WIPP 01/17/07			
	-2.704	Shipped to WIPP 01/18/07			
	-0.624	Shipped to WIPP 01/26/07			
	-1.248	Shipped to WIPP 03/06/07			
	-1.456	Shipped to WIPP 03/07/07			
	-1.456	Shipped to WIPP 03/08/07			
	-1.456	Shipped to WIPP 03/09/07			
	-1.456	Shipped to WIPP 03/14/07			
	-1.456	Shipped to WIPP 03/15/07			
	-1.456	Shipped to WIPP 03/16/07			
	-1.456	Shipped to WIPP 03/21/07			
	-1.456	Shipped to WIPP 03/22/07			
	-1.456	Shipped to WIPP 03/23/07			
	-1.456	Shipped to WIPP 03/28/07			
	-1.456	Shipped to WIPP 03/29/07			
	-2.704	Shipped to WIPP 03/30/07			
	-2.496	Shipped to WIPP 04/02/07			
	-2.704	Shipped to WIPP 04/03/07			
	-2.704	Shipped to WIPP 04/04/07			
	-2.704	Shipped to WIPP 04/11/07			
	-2.288	Shipped to WIPP 04/12/07			
	-2.496	Shipped to WIPP 04/13/07			
	-2.496	Shipped to WIPP 04/18/07			
	-2.496	Shipped to WIPP 04/19/07			
	-2.496	Shipped to WIPP 04/20/07			
	-2.288	Shipped to WIPP 04/25/07			
-2.496	Shipped to WIPP 04/26/07				
-2.496	Shipped to WIPP 04/27/07				
-2.496	Shipped to WIPP 05/02/07				
-2.288	Shipped to WIPP 05/03/07				
-2.496	Shipped to WIPP 05/04/07				
-2.496	Shipped to WIPP 05/17/07				
-2.288	Shipped to WIPP 05/18/07				
-1.456	Shipped to WIPP 05/31/07				
-1.456	Shipped to WIPP 06/01/07				

Treatability Group	FY06 Annual Update (m3)	Proposed Revision 18.0 (m3)	Comments	FY07 Annual Update (m3)	Projection FY06-FY10 (m3)
		-1.456	Shipped to WIPP 06/05/07		
		-1.456	Shipped to WIPP 06/06/07		
		-1.456	Shipped to WIPP 06/07/07		
		-1.456	Shipped to WIPP 06/12/07		
		-1.456	Shipped to WIPP 06/13/07		
		-1.456	Shipped to WIPP 06/14/07		
		-1.456	Shipped to WIPP 06/19/07		
		-1.248	Shipped to WIPP 06/20/07		
		-1.456	Shipped to WIPP 06/27/07		
		-1.57	Shipped to WIPP 06/28/07		
		-1.456	Shipped to WIPP 07/02/07		
		-1.456	Shipped to WIPP 07/05/07		
		-0.624	Shipped to WIPP 07/06/07		

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