

New Mexico Environment Department's (NMED's) Proposed Modifications to Los Alamos National Laboratory (LANL) Site Treatment Plan (STP) Revision 17.0, March 2007

NMED is proposing the following modifications to the STP Revision 17.0:

On page 4, Revision 17.0 Proposal, Attachment C, Table X.C.2.a.-7: Proposed Extensions of Milestone Activity Compliance Dates (see Table X.C.2.a.-7 below) – NMED is proposing to add treatability groups LA-W-925 Mercury Wastes, LA-W933 Lab Packs and LA-W924 Lead Wastes to Milestone Activity 3.2(J). NMED is proposing to modify the dates on Table X.C.2.a.-7 for milestone activities 3.1.8(A) from 08/28/2009 to 08/28/2008, 3.1.9(A) from 08/28/2009 to 08/28/2008 and 3.2(J) from 12/31/2010 to 12/31/2008.

On page 19, LANL CPV, 3.1.8(A) Treatment for Compressed Gases Requiring Scrubbing – NMED is proposing to modify the Compliance Date for Activity A from 8/28/09 to 8/28/2008. (See page 19 below.)

On page 20, LANL CPV, 3.1.9(A) Treatment for Compressed Gases Requiring Oxidation – is proposing to modify the Compliance Date for Activity A from 8/28/09 to 8/28/2008. (See page 20 below.)

On page 27, LANL CPV, 3.2(J) – Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done – NMED is proposing to modify the compliance date of 3.2(J) from 12/31/10 to 12/31/2008. (See page 27 below.)

On page 40, LANL CPV, Appendix A, History of STP Revisions and Amendment, Table A-1, Summary of Changes to the CPV and the FFCO – NMED is proposing to modify the compliance dates for Rev 17.0 of the table to reflect the modifications of 3.1.8(A), 3.1.9(A) and 3.2(J). (See page 40 below.)

DOE and LANS are requesting that the following milestone activity dates be extended to secure offsite shipment and treatment or because currently there is no path forward for the waste streams.

Table X.C.2.a.-7: Proposed Extensions of Milestone Activity Compliance Dates

Milestone Activity	Treatability Group	Revision 16 Compliance Date	Proposed Extended Compliance Date	Rationale for Extension
3.1.5(A)	<i>LA-W922 Noncombustible Debris</i>	08/25/2003	12/31/08	An extension of this Compliance Date is requested to secure offsite treatment and to complete shipment of this waste stream newly generated in FY06.
3.1.8(A)	<i>LA-W917 Compressed Gases Requiring Scrubbing</i>	08/09/2007	08/28/2009 08/28/2008	An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream. It is hoped that radioactivity will have decayed to an amount acceptable to commercial Treatment Storage and Disposal Facilities (TSDF), or that the items will be found amenable to treatability studies, and can be removed from inventory
3.1.9(A)	<i>LA-W918 Compressed Gases Requiring Oxidation</i>	08/09/2007	08/31/2009 08/28/2008	An extension of this Compliance Date is requested because there is no path forward at this time for this waste stream. It is hoped that radioactivity will have decayed to an amount acceptable to commercial TSDFs, or that the items will be found amenable to treatability studies, and can be removed from inventory
3.2(J)	<i>LA-W934 High Activity Wastes LA-W925 Mercury Wastes LA-W933 Lab Packs LA-924 Lead Wastes</i>	12/31/2007	12/31/2010 12/31/2008	An extension of this Compliance Date is requested because there is no path forward at this time for some items within these waste streams. In addition, this treatability group includes waste stream items newly generated in FY06. It is hoped that radioactivity will have decayed to an amount acceptable to commercial TSDFs, or that the items will be found amenable to treatability studies, and can be removed from inventory.

DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	12/21/06
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.8 Compressed Gases Requiring Scrubbing.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring scrubbing	LA-W917	D001, D002, P056	0.0080
Totals			0.0080

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/0709 8/28/08
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.9 Compressed Gases Requiring Oxidation.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
compressed gases requiring oxidation	LA-W918	D001, U226	0.06820.0758
Totals			-0.06820.0758

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

Any and all requirements imposed by the off-site (commercial or non-commercial) treatment facility and state regulatory, federal regulatory or other regulatory requirements applicable at the treatment site shall be met by DOE. DOE will notify the NMED Project Manager in writing as soon as possible and in any event within forty-five (45) working days of receipt of waste at the treatment facility.

Should DOE elect to use on-site recycling/re-use facilities in lieu of (or in combination with) treatment, it will follow the requirements prescribed in Section 2.3, as if the waste were shipped off-site for treatment. DOE will provide a notification letter to the NMED within forty-five days, in place of documentation that waste was received at an offsite facility.

Activity	Compliance Dates
A. Complete shipping of existing wastes to an off-site treatment facility or complete parallel option	8/28/07 8/28/08
B. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

3.1.10 Elemental Mercury.

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
elemental mercury	LA-W920	D006, D009, F005	0
	LA-W920-16		0.0009
Totals			0.0009

Treatment:

Shipment off-site for treatment is the preferred option. Parallel preferred options include on-site or off-site recycling/re-use or radiological decontamination. Should DOE decide to treat waste at an off-site non-commercial facility the DOE shall notify the NMED Project Manager in writing as soon as possible and in any event within fourteen (14) working days after confirmation of a shipment date with the affected off-site facility. The NMED Project Manager shall approve in writing the off-site non-commercial treatment option proposed by DOE prior to any shipment by DOE.

3.2 Mixed Waste Requiring Further Characterization or for Which Technology Assessment Has Not Been Done

Treatability Group(s):

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
lead wastes - TBD	LA-W924	D003, D008	0.00
mercury wastes - TBD	LA-W925-0	D007, D008, D009, F001	0.00
compressed gases - TBD	LA-W926	D001, D007, D009, D022, P056, U080, U226	0.00
biochemical laboratory wastes	LA-W927	D001, D003	0.00
dewatered treatment sludge	LA-W928	see Subsection 3.3 in the Background Volume	0.00
Totals			0.00

Note: See below for additional wastes in some of these treatability groups

Treatment:

The following steps will be taken to properly characterize this waste:

- Conduct additional generator interviews
- Prepare a sampling plan for waste not adequately characterized
- Conduct sampling and analysis
- Determine treatment options

Activities for wastes originally belonging to these treatability groups as listed above.

Activity	Compliance Dates
A. Complete generator interviews	10/30/95
B. Complete sampling and analysis plan	1/30/96
C. Complete sampling and analysis	9/30/98
D. Complete determination of treatment options	12/20/98
E. Complete shipping of existing wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/20/01
F. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at treatment facility or within 45 days after completion of parallel option

Additional wastes and treatability groups:

The following additional wastes will require management in this category, according to the Activities and Compliance Dates listed below.

Treatability group	MWIR waste ID	RCRA codes	Net volume (m ³)
lead wastes - TBD	LA-W924-15 LA-W924-16 LA-W924-17	D003, D008	0 0.21000 0.7003
mercury wastes-TBD	LA-W925-4 LA-W925-5 LA-W925-6 LA-W925-15 LA-W925-16 LA-W925-17	D003, D007, D008, D009 F001, F002, F005	0.7779 1.3231
explosives	LA-W932	D003	0.00
labpacks	LA-W933 LA-W933-17	D001, D002, D003, D004, D005, D006, D007, D008, D010, F003, F005, D011, P012, P029, P098, P106, P113, P120, U131, U144, U145, U188, U190, U204, U216, U219	0.00 0.4164
high activity waste	LA-W934 LA-W934-16	D001, D003, D008, D009	1.7378 1.5296
Totals			2.7257 3.9694

Activities for wastes belonging to these treatability groups and subgroups.

Activity	Compliance Dates
G. Complete sampling and analysis plan	1/30/99
H. Complete sampling and analysis	9/30/01
I. Complete determination of treatment options	12/20/01

J. Complete shipping of wastes to an off-site treatment facility, or submit documentation assigning waste items to applicable treatability groups or complete parallel option	12/31/07 12/31/08
K. Provide documentation to NMED that waste was received at off-site facility or provide notification of parallel option	Within 45 days of receipt of waste at off-site facility or within 45 days after completion of parallel option

3.3 Plans for Other Types of Activities.

The following subsection summarizes plans for other types of activities.

3.3.1 Lead Decontamination

Treatability Group(s):

Treatability group	MWIR waste ID	First Category	Second Category	Totals
		Net volume (m ³)	Net volume (m ³)	Net volume (m ³)
lead for surface decontamination	LA-W930-0 LA-W930-5	0.00	0.00	0.00
Totals		0.00	0.00	0.00

Note: See below for additional wastes in this treatability group

CPV APPENDIX A.
HISTORY OF STP REVISIONS AND AMENDMENT.

As discussed in CPV Section 1.3, the STP Compliance Plan Volume has been modified several times since it was originally issued, in accordance with the provisions of Section X, "Revisions," and Section XI, "Other Amendments to the STP," of the October 4, 1995 Federal Facility Compliance Order, as amended and revised. This Appendix provides a summary of these CPV changes, and of modifications to the FFCO since its issuance.

To date, there have been sixteen revisions and three amendments to the CPV. In addition, the FFCO was amended once, on May 20, 1997. The following Table A-1 provides a summary of these changes. More detailed descriptions can be found in the CPV Update portion of each year's STP *Annual Update*, and the original correspondence requesting each change.

Table A-1. SUMMARY OF CHANGES TO THE CPV AND THE FFCO.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 1.0	STP/CPV	6/12/96	Added off-site treatment as a parallel preferred option for most MLLW treatability groups
Rev. 2.0	STP/CPV	12/9/96	Reduced volume of LA-W928 by approving reclassification of sludges as LLW
Amendment 1.0	STP/CPV	10/30/96	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Rev. 3.0	STP/CPV	1/27/97	Divided original volume of LA-W929 into three subgroups, and added new Activities and Compliance Dates
Amendment 1.0	FFCO	5/20/97	Modified FFCO Sections IV, V, IX, and X to streamline waste transfers and deletions
Amendment 2.0	STP/CPV	9/4/97	Extended CPV Activity 3.1.2B Compliance Date to 12/29/97
Rev. 4.0	STP/CPV	12/29/97	Transferred original volume of LA-W929 from three subgroups to other treatability groups, added treatability groups, and deleted treated items
Rev. 5.0	STP/CPV	12/29/97	Added volumes reported in FY95 and FY96 <i>Annual Updates</i> (and certain other items) to several treatability groups, added Activities and Compliance Dates, added CPV Appendices, and deleted treated items
Rev. 6.0	STP/CPV	7/31/98	Added volumes reported in FY97 <i>Annual Update</i> to several treatability groups, added certain Activities and Compliance Dates, adjusted several original inventory volumes, transferred one LA-W929 item to a new treatability group, and deleted treated items
Rev. 7.0	STP/CPV	11/30/98	Removed on-site treatment skids, added STP inventory items, added on-site recycling/re-use and radiological decontamination, added notification for off-site treatability studies,
Rev. 8.0	STP/CPV	12/3/98	Extended compliance dates for treatment of MTRU waste.

Action	Document Modified	Effective Date	Effect on FFCO/STP
Rev. 9.0	STP/CPV	6/7/00	Added and deleted volumes reported in FY98 <i>Annual Update</i> to certain treatability groups.
Amendment 3.0	STP/CPV	8/30/99	Transferred three items to MTRU, transferred one item to subgroup within same treatability group.
Rev. 10.0	STP/CPV	12/18/00	Added and deleted volumes reported in FY99 <i>Annual Update</i> to certain treatability groups.
Rev. 11.0	STP/CPV	4/18/01	Added and deleted volumes reported in FY00 <i>Annual Update</i> .
Rev. 12.0	STP/CPV	3/13/02	Added and deleted volumes reported in FY01 <i>Annual Update</i> . Extended CPV Activity 3.1.5A Compliance Date to 8/25/03. Extended CPV Activity 3.1.11A to 2/01/04. Removed the requirement to develop treatment technologies and the associated compliance schedule in CPV Activity 4.0 and added language specifying that MTRU waste would be shipped off-site to WIPP for disposal.
Rev 13.0	STP/CPV	7/14/03	Added and deleted volumes reported in FY02 <i>Annual Update</i>
Rev 14.0	STP/CPV	1/5/05	Added and deleted volumes reported in FY03 <i>Annual Update</i>
Rev 15.0	STP/CPV	8/16/05	Added and deleted volumes reported in FY04 <i>Annual Update</i>
Rev 16.0	STP/CPV	TBD 12/12/06	Added and deleted volumes reported in FY05 <i>Annual Update</i> . Extended CPV Activity 3.1.8(A) Compliance Date to 8/09/07. Extended CPV Activity 3.1.9(A) Compliance Date to 8/09/07. Extended CPV Activity 3.1.10(A) Compliance Date to 8/31/07. Extended CPV Activity 3.1.11(A) Compliance Date to 12/31/07. Extended CPV Activity 3.2(J) Compliance Date to 12/31/07. Reclassified 0.2082 m ³ of LA-W934 High Activity MLL waste to MTRU waste.
Rev 17.0	STP/CPV	TBD	Added and deleted volumes reported in FY06 <i>Annual Updates</i> , Extended CPV Activity 3.1.5(A) Compliance Date to 12/31/08. Extended CPV Activity 3.1.8(A) Compliance Date to 8/28/0908. Extended CPV Activity 3.1.9(A) Compliance Date to 8/28/0908. Extended CPV Activity 3.2(J) Compliance Date to 12/31/4008.