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Nevada Test Site Site Treatment Plan 1999 Annual Update

March 1999

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MASTER

**Waste Management
Division**

U.S. Department of Energy
Nevada Operations Office

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1.0 Introduction

A Site Treatment Plan (STP) is required for facilities at which the U.S. Department of Energy Nevada Operations Office (DOE/NV) generates or stores mixed waste (MW), defined by the Federal Facility Compliance Act (FFCAct) as waste containing both a hazardous waste subject to the Resource Conservation and Recovery Act (RCRA) and a radioactive material subject to the Atomic Energy Act. This STP was written to identify specific treatment facilities for treating DOE/NV generated MW and provides proposed implementation schedules. This STP was approved by the Nevada Division of Environmental Protection (NDEP) and provided the basis for the negotiation and issuance of the FFCAct Consent Order (CO) dated March 6, 1996, and revised June 15, 1998. The FFCAct CO sets forth stringent regulatory requirements to comply with the implementation of the STP.

1.1 Purpose and Scope of the Annual Update for the Nevada Test Site--Site Treatment Plan

DOE/NV is required by the FFCAct CO to submit a draft annual update of the *Nevada Test Site--Site Treatment Plan* to NDEP for review and comment by January 15 of each year. DOE/NV is then required to finalize the draft update by April 30 of each year. In accordance with the FFCAct CO, each Annual Update will bring the STP current to the end of the previous federal fiscal year (FY). In addition, this update contains information through March 1, 1999, for completeness. The Annual Update will provide a summary of the current status of DOE/NV's progress in implementing the STP as required by the CO, including proposed revisions, technology development, and other concerns that may affect the implementation of the STP.

The following Nevada Test Site (NTS) waste streams are discussed in this Annual Update:

- a. Polychlorinated Biphenyl (PCB) Soil
- b. Lead-Contaminated Soil
- c. Bulk Lead Waste
- d. Treatability Test Facility (TTF) Solvent
- e. Mixed Transuranic (MTRU) Waste.

MTRU waste information reported in the Annual Update meets the annual reporting requirement set forth in the Settlement Agreement between the NDEP and DOE/NV.

1.2 Framework for Developing the Annual Update

The framework for developing the Annual Update generally follows the framework of the STP. Information reported in the STP is divided into two volumes. However, for clarity, the information required in the Background and Plan Volumes to this Annual Update have been combined.

2.0 STP-Covered Mixed Waste

This section includes the current status of MW managed under the STP and the FFCAct CO.

2.1 PCB Soil

This waste stream (NT-W005) was originally contained in a 30-gallon drum holding 0.11m³ of soil and compactible trash (personal protective equipment (PPE), and rags) and exhibiting not only PCB but also the hazardous constituents methylene chloride, acetone, toluene, and 1,1,1-trichloroethane. The U.S. Environmental Protection Agency (EPA) waste codes of F001, F003, and F005 were applied.

On November 19, 1996, the soil portion (0.01m³ - a three-liter sample) was shipped to the DOE Oak Ridge Toxic Substance Control Act (TSCA) Incinerator Facility for analysis. The TSCA Incinerator Facility used the entire sample in their analysis procedure. A request for closure on this portion of the PCB Soil waste stream has been submitted to NDEP via a letter dated November 19, 1998. NDEP concurred on closure of the soil portion via letter dated December 4, 1998.

The remaining portion of the PCB Soil waste stream stored on the Transuranic Waste Storage Pad (TRU Pad) consists of compactible trash (0.10m³). The compactible trash portion of this waste stream was originally referenced in the STP and continues to carry the waste codes (F001, F003, and F005) that were associated with the soil portion. NDEP concurred on this waste stream determination, made through process knowledge, via a letter dated March 16, 1998.

The compactible trash is planned to be treated at the DOE Oak Ridge TSCA Incinerator Facility. The PCB Soil associated compactible trash has been placed on the TSCA Incinerator Facility FY99 Burn Plan but shipment has not been scheduled. DOE Oak Ridge granted written approval to place this waste stream on the TSCA Facility FY99 Burn Plan on June 25, 1997. DOE/NV initiated discussions with NDEP via letter dated February 22, 1999. The compactible trash portion of the PCB Soil waste stream continues to be managed on the TRU Pad as MW.

2.1.1 PCB Soil Schedule (Compatible Trash)

Complete All Additional Waste Characterization Required by Receiving Site's WAC (STP/CO milestone)	DEADLINE: December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site (STP/CO milestone)	DEADLINE: June 30, 1997 COMPLETED: June 25, 1997
If Waste Rejected, Initiate Revision Process (STP/CO milestone)	DEADLINE: July 31, 1997 Not Applicable

Interim Status Report Submitted to NDEP	DEADLINE: November 30, 1998 COMPLETED: October 29, 1998
Notification to NDEP of Approval, by the Receiving Site, of the Shipping Schedule or Initiate Discussions with NDEP to Modify the Shipping Schedule.	DEADLINE: February 26, 1999 COMPLETED: February 22, 1999 Initiated Discussions
Initiate Preparation of Waste for Shipment if Approved (STP/CO milestone)	DEADLINE: In accordance with receiving site approved schedule
Complete Shipment of Waste	INTERIM ACTIVITY DATE: Dependent upon outcome of negotiations with appropriate parties

2.2 Lead-Contaminated Soil

The Lead-Contaminated Soil waste stream consists of soil (31.62m³) from the Area 3 Field Operations Department (FOD) (NT-W019, 29.8m³), the NTS T2 Site (NT-W019, NT-W020, 1.0m³), Area 12 (NT-W019, 0.62m³), and the Area 27 Explosive Ordnance Disposal (EOD) Unit (NT-W021, 0.20m³).

Portions of the above waste streams were combined with similar wastes from Federal Facility Agreement Consent Order (FFACO) corrective action units (CAU) 08-26-02 (Area 8, 0.02m³) and CAU 25-26-15 (Area 25, 0.02m³) which otherwise would have been regulated under the Mutual Consent Agreement (MCA).

In a letter to DOE/NV dated March 18, 1997, NDEP concurred with the DOE/NV assertion that eight boxes (16.33m³) were no longer MW and agreed to close this portion of the waste stream from the FFCAct CO. On July 10, 1997, the eight boxes of LLW were shipped to the NTS Area 5 Radioactive Waste Management Site (RWMS) for disposal. This portion has been closed from the STP (Letter from NDEP to DOE/NV dated May 18, 1998).

The Area 27 EOD soil contained in one 55-gallon drum (0.20m³) was originally thought to be contaminated with lead, radionuclides, and barium. Upon further characterization, it was determined to be hazardous waste. NDEP concurrence was received on August 11, 1997, and in November 1997, the Area 27 EOD hazardous waste soil was shipped off-site for disposal. This portion has been closed from the STP (Letter from NDEP to DOE/NV dated May 18, 1998). Seven boxes (15.13m³) were initially characterized as MW with lead above the Toxicity Characterization Leaching Procedure (TCLP) limits established by RCRA. Stabilization at Envirocare had been the preferred option for treatment of this waste stream. However, the seven boxes of MW containing lead shot, lead fines, and soil, did not meet the waste acceptance criteria (WAC) for macroencapsulation at Envirocare. In addition, Envirocare's proposed stabilization facility was not yet available. After additional review of the characterization data, it was

determined that three of the remaining seven boxes did not have properties of MW based on the NTS standards for radionuclides. NDEP granted concurrence via letter dated August 11, 1997, and the three boxes (6.26m^3) were shipped off-site for hazardous waste disposal on November 5, 1997. This portion has been closed from the STP (Letter from NDEP to DOE/NV dated May 18, 1998).

The only remaining MW is contained in four B-25 boxes (8.87m^3). Stabilization at a RCRA-permitted off-site facility was pursued for the soil contaminated with lead and radionuclides. The original FFCAct STP/CO deadline for shipping the remaining B-25 boxes of MW was September 30, 1997. In a letter dated July 31, 1997, DOE/NV requested a revision of this deadline due to problems contracting with the preferred treatment vendor. NDEP responded in a letter dated August 11, 1997, requesting more information and a new schedule. On September 17, 1997, a response letter with a new, revised schedule was sent to NDEP. After discussion at a DOE/NV and NDEP September 17, 1997, meeting, DOE/NV sent another letter dated October 9, 1997. This letter requested an extension of the deadline for shipping this waste, and provided additional information about the waste and appropriate treatment technologies. Based on discussion at the FFCAct First Quarter Meeting on November 5, 1997, another letter dated December 2, 1997, was sent to NDEP providing an revised action schedule and requesting that the September 30, 1997, deadline be held in abeyance. NDEP concurred on the abeyance and new schedule via letter dated December 19, 1997, as shown in Section 2.2.1 Alternate Schedule.

Envirocare declined DOE/NV access to perform an on-site audit of their treatment facility. A Request for Proposal (RFP) was sent January 8, 1998, to nine vendors. Three vendors responded to the RFP. A technical review has been completed and recommendations have been forwarded to procurement.

Waste Control Specialists, LLD (WCS) was selected as the preferred vendor. The contract was signed on May 11, 1998, and became effective May 14, 1998. The treated waste will ultimately be returned to DOE/NV for disposal at the Area 5 Radioactive Waste Management Site (RWMS). A schedule for treatment and disposal was submitted to NDEP via a letter dated May 18, 1998. Concurrence on this schedule was received via a letter dated June 24, 1998, as shown in Section 2.2.1 Alternate Schedule. On August 18, 1998, the four boxes of lead soil (8.87m^3) were shipped to WCS for treatment. The treated waste was returned to the NTS on December 17, 1998.

2.2.1 Lead-Contaminated Soil Schedule

Complete Soil Screening and Initiate Sampling of Screened Soil (STP/CO milestone)	DEADLINE: September 30, 1996 COMPLETED: August 22, 1996
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Complete All Additional Waste Characterization Required by Envirocare WAC	INTERIM ACTIVITY DATE: April 1, 1997 CANCELED: Pursuing Alternate Treatment Options
Receive Written Approval of Acceptance from Envirocare	INTERIM ACTIVITY DATE: May 30, 1997 CANCELED: Pursuing Alternate Treatment Options
Submit Schedule for Processing Backlogged Waste or Initiate Revision Process Detailed in NTS FFCA Act CO (STP/CO milestone)	DEADLINE: July 31, 1997 COMPLETED: July 31, 1997 Initiated Revision Process
Complete Shipment of Waste to Receiving Site (STP/CO milestone)	DEADLINE: September 30, 1997 HELD IN ABEYANCE Alternate Schedule Submitted December 2, 1997 NDEP concurred December 19, 1997
<ul style="list-style-type: none"> Eight boxes of lead soil (16.33m³) shipped to the NTS Area 5 RWMS for disposal Three boxes of lead soil (6.26m³) shipped off-site as hazardous waste One drum of Area 27 EOD soil (0.2m³) shipped off-site as hazardous waste 	<p>COMPLETED: July 10, 1997</p> <p>COMPLETED: November 5, 1997</p> <p>COMPLETED: November 5, 1997</p>

Alternate Schedule: Lead-Contaminated Soil

Envirocare is Approved as a Qualified Treatment Vendor by BN or a Request for Proposal (RFP) will be Issued Asking for Proposals from Other Qualified Vendors (milestone)	DEADLINE: January 30, 1998 COMPLETED: January 8, 1998 RFP Issued
If Envirocare is Approved as a Qualified Treatment Vendor, a Processing Schedule for Treatment at Envirocare will be Submitted (milestone)	DEADLINE: March 31, 1998 Not Applicable
If an RFP is Issued, a Processing Schedule with a Treatment Vendor will be Submitted or DOE/NV will Request in Writing that the Shipping Date be Held in Abeyance until a Contract with a Treatment Vendor can be Procured and Initiate Discussions with NDEP on Possible Alternative Solutions (milestone)	DEADLINE: May 29, 1998 COMPLETED: May 18, 1998

Submit Waste Characterization Profile to Treatment Vendor	DEADLINE: August 28, 1998 COMPLETED: June 29, 1998
Ship Waste to Treatment Facility	DEADLINE: September 30, 1998 COMPLETED: August 18, 1998
Receive Treated Waste Back from Treatment Facility	DEADLINE: January 29, 1999 COMPLETED: December 17, 1998
Dispose of Treated Waste at Area 5 RWMS	DEADLINE: April 30, 1999

2.3 Bulk Lead Waste

Approximately 70 percent of the bulk lead, which included the Defense Special Weapons Agency (DSWA) formerly the Defense Nuclear Agency (DNA) Lead Cylinders (NT-W020, 0.21m³), the Junior Hot Cell Mesh (NT-W022, 0.37m³), the Area 25 Test Cell C (NT-W023, 0.01m³), and a portion of T2 Lead (NT-W019, 2.10m³) was shipped off-site as MW to Envirocare on September 27, 1996, for treatment and disposal. This portion has been closed from the STP (Letter from NDEP to DOE/NV dated May 18, 1998).

The spent batteries (NT-W020, 0.076 m³) underwent additional sampling and analysis, as requested by Envirocare, in November 1996. They were added to bulk lead waste from FFACO CAU 386 Site #04-26-03 (0.10 m³) that was to be managed under the MCA. This waste, comprised of four percent of the total bulk lead waste stream, was shipped to Envirocare as MW on April 2, 1997, for treatment and disposal. This portion has been closed from the STP (Letter from NDEP to DOE/NV dated May 18, 1998).

The T2 lead cylinders (NT-W020, 1.0 m³) exceeded Envirocare's size constraint for macroencapsulation. DOE contended the T2 lead cylinders could be decontaminated and recycled as scrap metal and requested their redesignation as such from NDEP. NDEP concurred with DOE's request to redesignate the T2 lead cylinders as recyclable material in a letter dated April 10, 1997. As a condition of NDEP concurrence, DOE/NV continued to manage the T2 lead cylinders as a MW until they were shipped to Scientific Ecology Group (SEG) in Tennessee. The T2 lead cylinders, comprised of 26 percent of the total bulk lead waste stream, were shipped to SEG on July 2, 1997. Confirmation surveys have been done to demonstrate that the decontamination efforts were effective. Documentation regarding SEG receipt of T2 lead cylinders was forwarded to NDEP on November 28, 1997. This portion has been closed from the STP (Letter from NDEP to DOE/NV dated May 18, 1998).

The only waste remaining from this waste stream is compactible trash and PPE (0.42 m³) generated during sampling and repackaging operations. Sampling of this waste was completed November 20, 1997 and declared a MW by DOE/NV in a letter dated February 23, 1998. NDEP

concurrent with the schedule via letter dated March 16, 1998, as shown below in Section 2.3.1.3. DOE/NV submitted a disposition schedule to NDEP via a letter dated May 18, 1998. Concurrence on this schedule was received via a letter dated June 24, 1998. On August 18, 1998, the compactible trash and PPE was shipped to WCS for treatment. The treated waste was returned to the NTS on December 17, 1998.

2.3.1 Bulk Lead Waste Schedule

Complete All Additional Waste Characterization Required by Receiving Facility (STP/CO milestone)	DEADLINE: June 30, 1996 COMPLETED: June 6, 1996
Initiate Preparation of Waste for Shipment, If Approved, or Initiate Revision Process Detailed in the FFCAct CO (STP/CO milestone)	DEADLINE: September 30, 1996 COMPLETED: Waste Shipped September 27, 1996
Submit Schedule of Processing Backlogged Waste Based Upon Completion of Demonstration Project (STP/CO milestone)	DEADLINE: December 31, 1996 COMPLETED: December 31, 1996
Complete Shipment of Waste	INTERIM ACTIVITY DATE: February 28, 1997 COMPLETED: September 27, 1996

2.3.1.1 Spent Batteries Schedule

Initiate Contract with Permitted MW Treatment Facility to Treat Spent Batteries (milestone)	DEADLINE: April 1, 1997 COMPLETED: March 10, 1997
Initiate Preparation of Spent Battery Shipment to Receiving Site After Formalizing Contract with Designated Waste Treatment Facility (milestone)	DEADLINE: Within 60 Days of Successful Negotiation of Contract COMPLETED: April 2, 1997
Complete Spent Battery Shipment (milestone)	DEADLINE: Within 30 Days of Initiating Preparation of Waste Shipment COMPLETED: April 2, 1997

2.3.1.2 T2 Lead Cylinders Schedule

Initiate Contract with Designated Decontamination Facility for T2 Lead Reclamation (milestone)	DEADLINE: Within 60 Days of NDEP Concurrence that Lead Cylinders can be Categorized as Recyclable Scrap Metal NDEP Concurrence: April 10, 1997 DEADLINE: June 9, 1997 COMPLETED: May 1, 1997 Waste Shipped: July 2, 1997
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2.3.1.3 Compactible Trash and PPE Schedule

Characterize Waste as Hazardous, LLW, or MW	February 27, 1998 COMPLETED: February 23, 1998 Waste Declared MW
If Waste is Characterized as Hazardous or LLW, DOE/NV will provide NDEP with a Letter for Concurrence	March 31, 1998 Not Applicable
Submission of a Processing Schedule for Treatment and Disposal, or a Request to NDEP for Continued Storage. If a Request for Continued Storage is made, Steps will be Taken to Treat and Dispose.	DEADLINE: May 29, 1998 COMPLETED: May 18, 1998
Submit Waste Characterization Profile to Treatment Vendor	DEADLINE: August 28, 1998 COMPLETED: June 29, 1998
Ship Waste to Treatment Facility	DEADLINE: September 30, 1998 COMPLETED: August 18, 1998
Receive Treated Waste Back from Treatment Facility	DEADLINE: January 29, 1999 COMPLETED: December 17, 1998
Dispose of Treated Waste at Area 5 RWMS	DEADLINE: April 30, 1999

2.4 TTF Solvent

This waste stream (NT-W015) containing approximately 0.21m³ of liquid was discovered in a drum that emitted a strong odor when opened. The liquid was sampled for the first time on August 14, 1994; results indicated the presence of acetone (F003) and Cesium-137. The liquid was again sampled on August 30, 1995, to determine the flash point. Results indicated a flash point of 82°F which added the EPA waste code D001. Samples of this waste were shipped for analysis on November 19, 1996, to the Lockheed Martin Energy Systems (LMES) laboratory in Oak Ridge, Tennessee. The LMES analyses contradicted results from previous analyses done during sampling efforts. LMES found that the flashpoint of the TTF Solvent was above 200°F. This would mean that the liquid is not a D001 coded waste. LMES also determined that the liquid is not a organic solvent, but an acidic aqueous solution, exhibiting corrosivity and the EPA waste code D002. LMES also determined the EPA waste codes D006, D008, D010, and F001 should be applied. Incineration at the DOE Oak Ridge TSCA Incinerator Facility was considered to be the preferred treatment option.

DOE Oak Ridge granted written approval of this waste stream on June 25, 1997. The waste was included on the DOE Oak Ridge TSCA Incinerator Facility FY99 Burn Plan but was not scheduled for shipment. However, after further investigation, it was determined that the TTF

Solvent according to RCRA regulation was not suitable for the TSCA Incinerator Facility. The Statement of Policy under RCRA 40 CFR 268.3 clarifies the application of the LDR prohibition on dilution to combustion of certain inorganic metal-bearing hazardous wastes. Because combustion normally does not represent effective treatment of this waste, such burning can be considered impermissible dilution.

Per RCRA 40 CFR 262.11, the waste will be coded as D001, D002, D006, D008, and D010. There is no reason to believe or suspect the trace amounts of organics were used as solvents or degreasers since we do not know the process from which the waste was derived eliminating the need for the above stated F001 code. The liquid continues to be managed on the TRU Pad as MW. WSC a permitted treatment facility, has agreed to perform final characterization and a treatability study on the 55-gallon drum contents (25 gal). If WCS determines that they can successfully treat this waste, it will be treated and returned to the NTS for disposal. If WCS cannot successfully treat the waste, it will be returned to the NTS as a MW. DOE/NV submitted to NDEP a status report and requested return of the TTF Solvent to the NTS via letter dated November 5, 1998. NDEP concurred on the treatment plan and the new schedule via letter dated November 30, 1998, as shown in Section 2.4.1 Alternate Schedule. On January 12, 1999, the TTF Solvent was shipped to WSC for treatment as stated in a letter to NDEP dated February 2, 1999.

2.4.1 TTF Solvent Schedule

Complete All Additional Waste Characterization Required by Receiving Site's WAC (STP/CO milestone)	DEADLINE: December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site (STP/CO milestone)	DEADLINE: June 30, 1997 COMPLETED: June 25, 1997
If Waste Rejected, Initiate Revision Process Detailed in NTS FFCAct CO (STP/CO milestone)	DEADLINE: July 31, 1997 CANCELED: Waste not Rejected
Management Plan Submitted to NDEP (Per telephone conversation on 6/5/98 with NDEP, Management Plan was meant to be Interim Status Report)	DEADLINE: November 30, 1998 COMPLETED: November 5, 1998
Notification to NDEP of Intent to Treat Waste <u>or</u> Request to Hold this Date in Abeyance (milestone)	DEADLINE: April 16, 1999 COMPLETED: November 5, 1998
Initiate Preparation of Waste for Shipment, if Approved (STP/CO milestone)	DEADLINE: In accordance with receiving site approved schedule
Complete Shipment of Waste	INTERIM ACTIVITY DATE: Dependent upon outcome of negotiations with appropriate parties

Alternate Schedule: TTF Solvent

Ship Entire Volume of TTF Solvent as Sample to WCS	DEADLINE: March 30, 1999 COMPLETED: January 12, 1999
If WCS cannot Successfully Treat the TTF Solvent, the Waste will be Returned to the NTS as a Sample and an RFP will be Issued	DEADLINE: July 30, 1999
If an RFP is Issued, a Processing Schedule will be Submitted for the TTF Solvent, or DOE/NV will Initiate Discussions with NDEP on an Alternate Solution	DEADLINE: October 31, 1999

2.5 Mixed Transuranic Waste

There are approximately 617m³ of MTRU currently stored on the TRU Pad. Examination of the MTRU (non-classified drums containing 350m³) at the NTS Waste Examination Facility (WEF) is on schedule. Construction and operation of the facility was covered under the NTS Environmental Impact Statement Record of Decision that was signed December 10, 1996. Construction of the WEF was completed on June 26, 1997. A pilot demonstration project for visual inspection and repackaging of the MTRU waste drums was completed on October 9, 1997. The process to characterize the waste will undergo its certification audit in FY98, and characterization is scheduled to begin when certification is granted. A request to revise the deadline to complete pre-characterization activities by June 1, 1998, was formally transmitted to NDEP in a letter dated January 22, 1998. NDEP approved the request with the Alternate Schedule below replacing the FFCAct CO deadline of June 1, 1998, via letter dated February 20, 1998.

There are 58 nonstandard waste boxes of MTRU waste currently stored in Area 5 on the TRU Pad. These boxes comprise 267m³ of the total NTS MTRU inventory. Disposition alternatives for these boxes are currently being investigated by DOE/NV. Los Alamos National Laboratory (LANL) was contacted about the use of their Decontamination Volume Reduction System (DVRS) and whether the nonstandard boxes could be accepted. The LANL system was originally conceived as a mobile system, and the NTS would have been a user after LANL finished their scope of work. When the mobile criteria for the DVRS was eliminated, this option was dismissed as a viable option for the NTS due to the shipping and permitting constraints. A Deployment Plan was approved by the DOE Accelerated Site Technology Deployment Program for the Oversize TRU Waste Laser Cutting System at the NTS. Currently, DOE/NV is investigating locations at the NTS to deploy this project.

2.5.1 Mixed Transuranic Waste Schedule

Submit Work Plan to state of Nevada for TRU Waste Characterization Project (STP/CO milestone)	DEADLINE: February 29, 1996 COMPLETED: February 29, 1996
Complete Construction of Facility and Submit Processing Schedule (STP/CO milestone)	DEADLINE: June 30, 1997 COMPLETED: June 26, 1997
Complete Pre-Characterization Activities Required by Waste Isolation Pilot Plant (WIPP) with all Required Information Submitted for Incorporation into the WIPP Waste Information System or Initiate Discussions with state of Nevada if WIPP Does Not Open (STP/CO milestone)	DEADLINE: June 1, 1998 See Revised Schedule below
Prepare a Plan to Ship MTRU to WIPP	INTERIM ACTIVITY DATE: Within 12 months of decision to operate WIPP
Provide a Timetable for Submitting a Shipping Schedule	INTERIM ACTIVITY DATE: Within 12 months of decision to operate WIPP

Processing Schedule: Mixed Transuranic Waste

End Review of Procedure and Operating Capability of Waste Examination Facility (WEF) for Non-Radioactive Material in Drums (STP/CO milestone)	December 15, 1997 COMPLETED: September 4, 1997
Submit to NDEP an Affirmation that the WEF is Fully Operational and Capable of Initiating Pre-Characterization Activities to meet the June 1, 1998 Deadline	DEADLINE: December 15, 1997 Established in NDEP letter September 22, 1997 COMPLETED: December 18, 1997
Initiate Visual Examination and Repackaging of Radioactive Material in 12 Drums	INTERIM ACTIVITY DATE: January 30, 1998 COMPLETED: September 22, 1997
Complete Examination and Repackaging of Radioactive Material in 12 Drums	INTERIM ACTIVITY DATE: April 30, 1998 COMPLETED: October 9, 1997

Alternate Schedule: Mixed Transuranic Waste

Submit to NDEP Complete Results and Conclusions from the DOE Carlsbad Area Office (CAO) Audit of the Certification of the WEF for Review by NDEP	DEADLINE: September 1, 1998 COMPLETED: August 31, 1998
Submit Shipping Schedule from the DOE/CAO for Processing of the MTRU at WIPP	DEADLINE: September 1, 1998 COMPLETED: August 31, 1998

3.0 Summary

All STP milestones or FFCAct CO deadlines were met for FY98.

The following waste streams in the Background Volume of the STP have been shipped for treatment and/or disposal. Therefore, they have been deleted from the STP issued on March 6, 1996. Location of documentation on the status for these waste streams is provided in parenthesis.

- a. Pico Fluor (miscellaneous correspondence)
- b. Analytical Services Department Solvent (miscellaneous correspondence)
- c. Basic Environmental Compliance and Monitoring Program (BECAMP) Scintillation Vials (Letter from NDEP to DOE/NV dated November 17, 1995)
- d. BECAMP Scintillation Vial-Associated Waste (Letter from NDEP to DOE/NV dated November 17, 1995)
- e. Shipping Cask (Letter from NDEP to DOE/NV dated September 13, 1996)
- f. Area 12 Solvent Sludge (Letter from NDEP to DOE/NV dated May 18, 1998)
- g. Cotter Concentrate (Letter from NDEP to DOE/NV dated November 9, 1998)
 - Cotter Concentrate (Population A, 1239 Drums, 197m³) shipped for recycling
 - Cotter Concentrate (Population B, 9 Drums, 0.9m³) shipped for recycling
 - Cotter Concentrate Associated Trash (368.0m³, new volume generated during sampling and repackaging of the STP Cotter Concentrate waste stream) shipped as LLW
 - Cotter Concentrate (Treatability Study, 0.06m³) shipped as MW meeting Land Disposal Restrictions (LDR).

The waste streams listed below have been closed in this Annual Update. Closure indicates NDEP concurrence that DOE/NV no longer has to include these in waste stream status reports. These wastes cannot be requested for deletion until the original waste stream and all its ancillary components have been dispositioned.

- a. Lead-Contaminated Soil
 - Eight boxes (16.33m³) shipped as Low-level Waste (LLW) (Letter from NDEP to

- DOE/NV dated March 18, 1997)
- Area 27 EOD Soil (0.20m^3) shipped as Hazardous Waste (Letter from NDEP to DOE/NV dated May 18, 1998)
- Three B-25 boxes (6.26m^3) shipped as Hazardous Waste (Letter from NDEP to DOE/NV dated May 18, 1998)
- b. A portion of the PCB Soil Waste (0.01m^3) entire sample used in analysis (Letter from NDEP to DOE/NV dated December 4, 1998).

The above listed waste streams represent a 74% completion of the STP. The remaining waste streams, listed below, will continue to be managed under the STP and FFCAct CO until such time that they can be closed or deleted and concurrence has been received by NDEP.

- a. PCB Soil Associated PPE and Rags (0.1m^3)
- b. Lead Contaminated Soil (8.87m^3)
- c. Bulk Lead Associated Compactible Trash (0.42m^3 , new volume generated during sampling and handling of STP bulk lead waste stream)
- d. TTF Solvent (0.21m^3)
- e. Mixed Transuranic Waste (620m^3 , additional volumes may be generated during the repackaging process).

Completion and submittal of a Annual Update to NDEP by April 30 of each year, meets reporting requirements of the FFCAct CO Part X.1.