



WIPP: Shipments of LANL Wastes to the Waste Isolation Pilot Plant

Review of documents relating to the proposed shipments of LANL TA-55-43 Wastes to the Waste Isolation Pilot Plant

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1 Introduction

Los Alamos National Laboratory proposes to ship waste from the TA-55 facility to the Waste Isolation Pilot Plant prior to WIPP receiving a Resource Conservation and Recovery Act (RCRA) permit. According to LANL, this waste consists of retrievably stored debris waste designated as waste stream TA-55-43 and is not regulated under RCRA. This claim is made by what LANL calls using “Acceptable Knowledge” of the waste generation process.

The purpose of this report is to provide an analysis of whether this waste may actually be subject to RCRA regulation. There are two issues that will be examined. First, we will show that the waste may actually fall under RCRA regulation because it exhibits the characteristics of hazardous waste. Second, we will show that flaws in the documentation of the waste LANL proposes to ship are substantial enough to invalidate LANL’s claim that it has “Acceptable Knowledge” that the wastes are not hazardous.

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