

General



**ENTERED
RECEIVED**

AUG - 5 2014



**NMED
Hazardous Waste Bureau**

**Environmental Protection Division
Environmental Compliance Programs (ENV-CP)**
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

**National Nuclear Security Administration
Los Alamos Field Office, A316**
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: **AUG 05 2014**

Symbol: ENV-DO-14-0187

LAUR: 14-25441

Locates Action No.: N/A

Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Dear Mr. Kieling:

Subject: Notification of Resolved Off-site Shipment Discrepancy

The purpose of this letter is to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of a waste characterization discrepancy as required by the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. Permit Section 2.4.7(4) states the Permittees shall notify the NMED-HWB in writing within three days of receipt of a notice of a waste not matching the pre-approved waste analysis certification or accompanying waste manifest from the receiving facility.

The Permittees shipped a non-regulated liquid waste container W743555 to Veolia ES Technical Solutions, LLC in Colorado on May 28, 2014 and shipment was received on June 12, 2014. The manifest was returned to the Permittees thereafter without any discrepancies. In accordance with normal operations at the treatment storage and disposal facility (TSDF) the pH levels were measured at 13.2. On June 20, 2014 the Permittees received a notification from Veolia ES Technical Solutions, LLC stating that the pH of the container (W743555) was higher than the waste profile allowed and was a hazardous waste.

On June 23, 2014, the Permittees provided the NMED-HWB with an email notification which served as the three day notice per Permit Section 2.4.7(4). As a result of the notification, the NMED-HWB requested additional information and the responses are as follows:

1. The unique waste stream identifier for the subject stream
See the attached Enclosure 1
2. The active waste profile form for the stream at the time of the notification
See the attached Enclosure 1



36566



3. Documentation for the basis of the waste profile (analytical data if available, or documentation supporting the use of AK)
See the attached Enclosure 1
4. The date and result of the most recent characterization review
The most recent characterization review was conducted on January 14, 2014.
5. The location where the stream is generated (if not included on the WPF)
Technical Area (TA) - 03, Building 40
6. A detailed description of the waste steam generation process that includes all relevant material inputs or other information that identifies the chemical content and physical form of the waste
Container W743555 was sent for disposal under Waste Stream ID 21264, propylene glycol and water from a closed loop chiller process. The waste stream was described as containing 40-60% propylene glycol and 0.01-40% water. The total amount of waste was 100 mL (3.4 oz.).
7. A description of the variability of the waste stream or process that might cause pH differences
The waste was improperly characterized by the waste generator. Container W743555 actually contained 45-55% propylene glycol and 45-55% aqueous potassium hydroxide. The waste should have been disposed of under an alternate Waste Stream ID 36130.
8. A history of the stream (*i.e.*, when first generated, approximate quantities generated per month, the number and times of off-site shipment)
In November 2011 a hydrogen generator was taken offline because potassium hydroxide that had been used in the generator was corroding copper lines in the system. Propylene glycol was used in the hydrogen generator as a coolant.

When it was discovered that the copper lines were breached, a sample of the propylene glycol was collected to determine if it had been contaminated with potassium hydroxide. This sample is the 100 ml that is mentioned above (Comment 6).

In late April of 2012, 25 gallons of potassium hydroxide contaminated propylene glycol were evacuated from the hydrogen generator and drained into a 30 gallon drum. The 100 mL sample was stored in one of the group's laboratories and never returned to be disposed of with the 30 gallon drum. A request for disposal of the 30 gallon drum was submitted under Waste Stream ID 36130 (see comment # 7) on June 28, 2012 and the drum was transported to TA-54, Area L, on July 9, 2012.

On March 19, 2013, the waste generator requested disposal of the 100 mL sample under waste stream ID 21264 (propylene glycol and water) which belonged to a different waste generator. On March 28, 2013, the waste generator was instructed by the waste management coordinator to obtain permission from the generator of waste stream ID 21264 for use of his waste profile and to ensure that the waste matched the waste profile criteria. On April 2, 2013, the waste generator obtained permission from the generator of waste

stream ID 21264 and confirmed that the waste was in fact propylene glycol and water, matching the waste stream ID 21264.

The generator failed to properly characterize the waste and submitted the request for disposal under Waste Stream ID 21264 instead of Waste Stream ID 36130.

9. Steps taken to recharacterize the waste stream as required by Permit Section 2.4.7 (4) prior to any future off-site shipments (including analytical data if available, or documentation supporting the use of AK)

All waste from the hydrogen generator has been properly disposed. There is no longer any amount of the propylene glycol and aqueous potassium hydroxide waste in storage or use.

The Corrective Actions to prevent this occurrence will require waste generators to test the pH of their waste streams prior to submitting a waste disposal request and waste streams must be sampled at a minimum of once per year to ensure that the waste meets the criteria established on the waste profile for the waste.

10. What checks (and results), in addition to pH, were performed by the TSDF when the pH variance was identified

In accordance with the email sent to the Permittees on July 15, 2014, the types of checks performed on the waste included a basic fingerprint analysis. The pH was also measured using a strip and a probe, a visual of the waste was conducted, as well as a test to determine if the waste was flammable. If the waste burned then a flash point was conducted.

11. An explanation of why an antifreeze might be, or need to be, so basic

Propylene glycol had been contaminated with potassium hydroxide, creating elevated pH levels.

12. A listing of the rules violated due to the mischaracterization of the stream

The generator improperly characterized the waste stream as required by Permit Section 2.4.1. As a result, the generator failed to make a hazardous waste determination in accordance with 40 CFR 262.11.

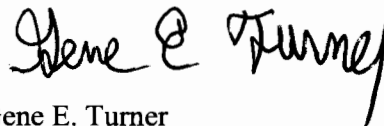
If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or Mark P. Haagenstad (LANS) at (505) 665-2014.

Sincerely,



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security LLC

Sincerely,



Gene E. Turner
Environmental Permitting Manager
Environmental Projects Office
Los Alamos Field Office
U.S. Department of Energy

Mr. John E. Kieling
ENV-DO-14-0187

- 4 -

AMD:GET:TAD/lm

Enclosure 1: Waste Profile Form

Cy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Tim Hall, NMED/HWB, Santa Fe, NM, (E-File)
Peter Maggiore, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Eric L. Trujillo, NA-LA, (E-File)
Carl A. Beard, PADOPS, (E-File to aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Steven J. Singledecker, WM-SVS, (E-File)
Robert L. Dodge, WM-DO, (E-File)
Ronnie A. Garcia, WM-SVS, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Tammy A. Diaz, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)



REC'D MAR 13 2006

ORIGINAL

WASTE PROFILE FORM

Contact (if other than given below)		For rapid processing, complete all sections in black or blue ink and mail to: SOLID WASTE OPERATIONS GROUP at MS J595. For assistance with completing this form, call SOLID WASTE OPERATIONS GROUP at 5-4000.				Reference Number 39184 (For SOLID WASTE OPERATIONS GROUP use only.)	
Generator's Z Number 1167875	Waste Generator's Name (print) Christopher Romero		WMC's Z Number 193789	WMC's Name (print) Suneer Sandoval			
Generator's Telephone 5-3978	Generator's Mail Stop D429	Waste Generating Group MST-11	Waste Stream Technical Area 3	Building 40	Room A11	WMC Telephone 606-1460	
Waste Accumulation (Check only one.)	<input type="checkbox"/> Satellite Accumulation Area	Site no: _____	<input type="checkbox"/> PCBs Storage Area	Site no: _____			
	<input type="checkbox"/> Less-than-90-days Storage Area	Site no: _____	<input type="checkbox"/> NM Special Waste	Site no: _____			
	<input type="checkbox"/> TSDF	Site no: _____	<input type="checkbox"/> Rad Staging Area	Site no: _____			
	<input type="checkbox"/> Universal Waste Storage Area	Site no: _____	<input type="checkbox"/> Rad Storage Area	Site no: _____			
	<input type="checkbox"/> Used Oil for Recycle	Site no: _____	<input checked="" type="checkbox"/> None of the Above				
ER Use Only	<input type="checkbox"/> ER Site	SWMU/AOC #: _____					
Method of Characterization (Check as many as apply.)	<input type="checkbox"/> Chemical/Physical Analysis	<input type="checkbox"/> Attached	Sample #: _____				
	<input type="checkbox"/> Radiological Analysis	<input type="checkbox"/> Attached	Sample #: _____				
	<input type="checkbox"/> PCB Analysis	<input type="checkbox"/> Attached	Sample #: _____				
	<input type="checkbox"/> Acceptable Knowledge Documentation	<input type="checkbox"/> Attached	Documentation #: _____				
	<input checked="" type="checkbox"/> MSDS	<input type="checkbox"/> Attached					

Section 1 - Waste Prevention/Minimization (answer all questions)

Can hazard segregation, elimination, or material substitution be used?	<input type="checkbox"/> Yes (Provide comments)	<input checked="" type="checkbox"/> No
Can any of the materials in the waste stream be recycled or reused?	<input type="checkbox"/> Yes (Provide comments)	<input checked="" type="checkbox"/> No
Has waste minimization been incorporated into procedures or other process controls?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No (Provide comments)
Can this waste be generated outside a RCA?	<input type="checkbox"/> Yes (Provide comments)	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Section 2 - Chemical and Physical Information

Waste Type (Check only one.) <input type="checkbox"/> Unused/Unspent Chemical (Complete all sections as appropriate.) <input checked="" type="checkbox"/> Process Waste/Spent Chemical/ Other (Complete all sections.)	Waste Category (Check all that apply.) <input checked="" type="checkbox"/> Inorganic <input checked="" type="checkbox"/> Organic <input type="checkbox"/> Solvent * <input type="checkbox"/> Degreaser * <input type="checkbox"/> Dioxin <input type="checkbox"/> Electroplating <input type="checkbox"/> Treated Hazardous waste or residue <input type="checkbox"/> No-Longer Contained-In <input type="checkbox"/> Explosive process <input type="checkbox"/> Infectious/Medical <input type="checkbox"/> Biological <input type="checkbox"/> Beryllium <input type="checkbox"/> Empty Container (See instructions) <input type="checkbox"/> Battery (See instructions) Asbestos <input type="checkbox"/> friable <input type="checkbox"/> non-friable PCB Source Concentration <input type="checkbox"/> PCB < 50 ppm <input type="checkbox"/> PCB ≥ 50 - < 500 ppm <input type="checkbox"/> PCB ≥ 500 ppm <input type="checkbox"/> Hazardous Waste Contaminated Soil <input type="checkbox"/> Untreated Hazardous Debris <input type="checkbox"/> Commercial Solid Waste <input type="checkbox"/> Other (Describe below) * See instructions.	Waste Source (Check only one.) Waste Source A <input type="checkbox"/> Decon <input type="checkbox"/> Materials Processing/Production <input checked="" type="checkbox"/> Research/Development/Testing <input type="checkbox"/> Scheduled Maintenance <input type="checkbox"/> Housekeeping - Routine <input type="checkbox"/> Spill Cleanup - Routine <input type="checkbox"/> Sampling - Routine Monitoring <input type="checkbox"/> Other (Describe below) Waste Source B <input type="checkbox"/> Abatement <input type="checkbox"/> Construction/Upgrades <input type="checkbox"/> Demolition <input type="checkbox"/> Decon/Decom <input type="checkbox"/> Investigative Derived <input type="checkbox"/> Orphan/Legacy <input type="checkbox"/> Remediation/Restoration <input type="checkbox"/> Repacking (Secondary) <input type="checkbox"/> Unscheduled Maintenance <input type="checkbox"/> Housekeeping (Non-routine) <input type="checkbox"/> Spill Cleanup (Non-routine) <input type="checkbox"/> UST - Non-petroleum <input type="checkbox"/> UST - Petroleum <input type="checkbox"/> Other (Describe below)	Waste Matrix (Check only one.) Gas <input type="checkbox"/> ≤ 1.5 Atmospheres pressure <input type="checkbox"/> > 1.5 Atmospheres pressure <input type="checkbox"/> Liquefied compressed gas Liquid <input checked="" type="checkbox"/> Aqueous <input type="checkbox"/> Non-aqueous <input type="checkbox"/> Suspended Solids/ Aqueous <input type="checkbox"/> Suspended Solids/ Non-aqueous Solid <input type="checkbox"/> Powder/Ash/Dust <input type="checkbox"/> Solid <input type="checkbox"/> Sludge <input type="checkbox"/> Absorbed/solidified liquid <input type="checkbox"/> Debris Matrix Type (Check only one.) <input type="checkbox"/> Homogeneous <input checked="" type="checkbox"/> Heterogeneous (Describe below) Estimated Annual Volume (m³): 100 x 10⁻³ = 0.1
Radiological Information Was Waste Generated in a RCA? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Non-radioactive <input type="checkbox"/> Radioactive - Low Level <input type="checkbox"/> Radioactive - Transuranic	Waste Destination (Check only one) <input type="checkbox"/> SWWS (Complete Attachment 1) <input type="checkbox"/> RLWTF (Complete Attachment 2) <input type="checkbox"/> RLWTP (Complete Attachment 3) <input type="checkbox"/> TA-16/HE (Complete Attachment 4) <input type="checkbox"/> NTS (Complete Attachment 5)		
Classification Information <input checked="" type="checkbox"/> Unclassified <input type="checkbox"/> Classified/Sensitive			

Handwritten note: For WMC \$1500

Section 3 - Process and Waste Descriptions

Process Description:

Propylene Glycol & water in a closed loop, a chiller process

Waste Description:

Propylene Glycol & water

Section 4 - Characteristics

Ignitability (Check only one.) (°F) (°C)	Corrosivity (Check only one.) (pH)	Reactivity (Check as many as apply.)	Boiling Point (Check only one.) (°F) (°C)
<input type="checkbox"/> < 73 < 22.8	<input type="checkbox"/> ≤ 2.0	<input type="checkbox"/> RCRA Unstable	<input type="checkbox"/> ≤ 95 ≤ 35
<input type="checkbox"/> 73 - 99 22.8 - 37.2	<input type="checkbox"/> 2.1 - 4.0	<input type="checkbox"/> Water Reactive	<input type="checkbox"/> > 95 > 35
<input type="checkbox"/> 100 - 139 37.8 - 59.4	<input type="checkbox"/> 4.1 - 6.0	<input type="checkbox"/> Cyanide Bearing	
<input type="checkbox"/> 140 - 200 60.0 - 93.3	<input type="checkbox"/> 6.1 - 9.0	<input type="checkbox"/> Sulfide Bearing	
<input type="checkbox"/> > 200 > 93.3	<input type="checkbox"/> 9.1 - 12.4	<input type="checkbox"/> Pyrophoric	
<input type="checkbox"/> EPA Ignitable - Non-liquid	<input type="checkbox"/> ≥ 12.5	<input type="checkbox"/> Shock Sensitive	
<input type="checkbox"/> DOT Flammable Gas	<input type="checkbox"/> Liquid corrosive to steel	<input type="checkbox"/> Explosive - DOT Div. _____	
<input type="checkbox"/> DOT Oxidizer	<input checked="" type="checkbox"/> Non-aqueous	<input checked="" type="checkbox"/> Non-reactive	<input checked="" type="checkbox"/> Not applicable
<input checked="" type="checkbox"/> Not ignitable			

Identify for all contaminants listed.	Characterization Method			None or Non-detect	Concentration of Contaminants		Regulatory Limit
	AK	TCLP	Total		Minimum	Maximum	
Toxicity Characteristic Metals					(10,000 ppm = 1%)		
Arsenic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	5.0 ppm
Barium	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	100.0 ppm
Cadmium	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	1.0 ppm
Chromium (Total)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	5.0 ppm
Lead	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	5.0 ppm
Mercury	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.2 ppm
Selenium	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	1.0 ppm
Silver	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	5.0 ppm
Toxicity Characteristic Organics							
Benzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm
Carbon tetrachloride	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm
Chlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	100.0 ppm
Chloroform	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	6.0 ppm
o - cresol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	200.0 ppm
m - cresol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	200.0 ppm
p - cresol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	200.0 ppm
Cresol - mixed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	200.0 ppm
1,4-Dichlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	7.5 ppm
1,2-Dichloroethane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm
1,1-Dichloroethylene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.7 ppm
2,4-Dinitrotoluene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.13 ppm
Hexachlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.13 ppm
Hexachlorobutadiene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm
Hexachloroethane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	3.0 ppm
Methyl ethyl ketone	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	200.0 ppm
Nitrobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	2.0 ppm
Pentachlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	100.0 ppm
Pyridine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	5.0 ppm
Tetrachloroethylene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.7 ppm
Trichloroethylene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm
2,4,5-Trichlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	400.0 ppm
2,4,6-Trichlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	2.0 ppm
Vinyl chloride	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.2 ppm
Herbicides and Pesticides							
Chlordane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.03 ppm
2,4-D	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	10.0 ppm
Endrin	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.02 ppm
Heptachlor (& its epoxide)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.008 ppm
Lindane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.4 ppm
Methoxychlor	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	10.0 ppm
Toxaphene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm
2,4,5-TP (Silvex)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ to _____	ppm	0.5 ppm



WASTE PROFILE FORM

WPF #: 39184

21-Feb-2007 10:56 AM

(Version: 1)

Generator : Romero, Christopher MST-11
WMC : SANDOVAL, SUNEE WS-WA
FROM : NWIS-SWO

MS : D429
MS : D435
MS : J962/5-4000

WASTE PROFILE (WPF) EXTENSION QUESTIONNAIRE

Our files indicate that your WPF#: 39184 was submitted approximately one year ago. Please review the attached copy and answer the following questions concerning your waste stream to determine whether to renew or void your WPF. Note: Only the generator can sign for the extension (to renew). Please return the signed questionnaire to NWIS-SWO at the address listed below. If your waste stream remains the same, your WPF will be extended for another year. Upon approval of this signed Extension Certification, you will receive a notice indicating that your WPF is valid for another year. If there are changes in your waste stream, a new WPF will need to be completed.

Are you currently the same generator as indicated above?

YES NO

Are you currently producing the same type of waste as indicated on WPF#: 39184

YES NO

If yes, please sign the Extension Certification below

If no, will you be producing the same type of waste in the near future?

YES NO

If yes, please sign the Extension Certification below

If no, will you be producing a different type of waste?

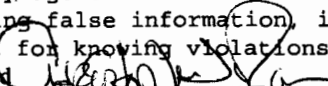
YES NO

If no, sign the Void Approval below to indicate that your WPF should be voided

If yes, please submit a new WPF, along with this memo. We will then void your previous WPF and process a new one

Extension Certification

I am producing or will produce the same type of waste as indicated in WPF# 39184 Based on my knowledge of the waste and/or chemical/physical analysis, I certify that the waste characterization information on this form is correct and that it meets the requirements of the applicable waste acceptance criteria. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Extension-> Signed  Z#167875 Date 02/27/07

Void Approval

I will no longer be generating or will be producing a different type or composition (a new WPF will be submitted) of waste as indicated in WPF# 39184

Void-> Signed _____ Date _____

NOTE: PLEASE FOLD AND STAPLE THE FORM TO THE LINE BELOW AND RETURN TO ADDRESS PROVIDED

TO: NWIS-SWO

MS: J962

PHONE: 5-4000



WASTE PROFILE FORM

WPF #: 39184

05-Mar-2007 03:05 PM

(Version: 1)

Generator : Romero, Christopher MST-11	MS : D429
WMC : SANDOVAL, SUNEE WS-WA	MS : D435
FROM : NWIS-SWO	MS : J962/5-4000

WASTE PROFILE (WPF) EXTENSION QUESTIONNAIRE

Our files indicate that your WPF#: 39184 was submitted approximately one year ago. Please review the attached copy and answer the following questions concerning your waste stream to determine whether to renew or void your WPF. Note: Only the generator can sign for the extension (to renew). Please return the signed questionnaire to NWIS-SWO at the address listed below. If your waste stream remains the same, your WPF will be extended for another year. Upon approval of this signed Extension Certification, you will receive a notice indicating that your WPF is valid for another year. If there are changes in your waste stream, a new WPF will need to be completed.

Are you currently the same generator as indicated above?

YES _____ NO _____

Are you currently producing the same type of waste as indicated on WPF#: 39184

YES _____ NO _____

If yes, please sign the Extension Certification below

If no, will you be producing the same type of waste in the near future?

YES _____ NO _____

If yes, please sign the Extension Certification below

If no, will you be producing a different type of waste?

YES _____ NO _____

If no, sign the Void Approval below to indicate that your WPF should be voided

If yes, please submit a new WPF, along with this memo. We will then void your previous WPF and process a new one

Extension Certification

I am producing or will produce the same type of waste as indicated in WPF# 39184 Based on my knowledge of the waste and/or chemical/physical analysis, I certify that the waste characterization information on this form is correct and that it meets the requirements of the applicable waste acceptance criteria. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Extension-> Signed Christopher Romero Z#167875 Date 4/02/07

Void Approval

I will no longer be generating or will be producing a different type or composition (a new WPF will be submitted) of waste as indicated in WPF# 39184

Void-> Signed _____ Date _____

NOTE: PLEASE FOLD AND STAPLE THE FORM TO THE LINE BELOW AND RETURN TO ADDRESS PROVIDED

TO: NWIS-SWO

MS: J962

PHONE: 5-4000