



NMED
Hazardous Waste Bureau

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AUG 21 2014

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*Date: AUG 21 2014
Symbol: ENV-DO-14-0219
LAUR: 14-26308
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 Waste Characterization Discrepancy Regarding Application of EPA Hazardous Waste Number D001 to Nitrate-Salt-Bearing Waste Containers Shipped Off-Site From Los Alamos National Laboratory

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, *Waste Characterization Review*, of the Permit states that the Permittees shall "...(4) Recharacterize a hazardous waste stream whenever the Permittees are notified by a receiving off-site facility that the characterization of a hazardous waste they obtained from the Permittees' Facility does not match a pre-approved waste analysis certification or accompanying waste manifest or shipping paper. The Permittees shall notify the Department in writing within three days of their receipt of the notice of the discrepancy from a receiving facility." This letter is provided in follow-up to an August 13, 2014, electronic mail from Mark Haagenstad, Los Alamos National Security, LLC (LANS), to John Kieling, NMED-HWB, on the same subject.

The Department of Energy (DOE) and LANS (the Permittees) shipped nitrate-salt-bearing waste containers to the Waste Isolation Pilot Plant (WIPP) between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests. Additional shipments of this waste stream were made to Waste Control Specialists (WCS) in Andrews, Texas, and the Idaho National Laboratory. A list of the LANL manifest numbers for the referenced WIPP shipments is provided in Enclosure 1.



Since that time, the LANL and WIPP Permittees have each made the decision to add the Environmental Protection Agency (EPA) Hazardous Waste Number D001 for ignitability to the LANL nitrate-salt-bearing waste containers at their respective facilities. As a result, the characterization of the containers WIPP received from LANL no longer matches the pre-approved waste analysis certifications that accompanied the waste manifests and shipping papers associated with the original off-site shipments.

Based on the DOE/LANS' written concurrence that WIPP may correct the 49 original manifests (Enclosure 1), the Permittees are hereby notifying the Department of the newly-identified discrepancy, in accordance with Permit Section 2.4.7(4). This letter constitutes notification with respect to the wastes associated with the 49 referenced manifests.

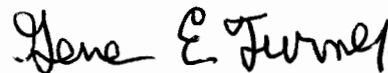
If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or Mark P. Haagenstad (LANS) at (505) 665-2014.

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

AMD:GET:TAD/lm

Enclosure: August 13, 2014 LANL Concurrence Letter to WIPP

Cy: Ryan Flynn, NMED, Santa Fe, NM, (E-File)
Tom Blaine, NMED, Santa Fe, NM, (E-File)
Steve Pullen, NMED/HWB, Santa Fe, NM, (E-File)
Timothy Hall, NMED/HWB, Santa Fe, NM, (E-File)
Trais Kliphuis, NMED, Santa Fe, NM, (E-File)
Peter Maggiore, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Eric L. Trujillo, NA-LA, (E-File)
Kirsten Laskey, NA-LA, (E-File)
Carl A. Beard, PADOPS, (E-File to aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Jeffery D. Mousseau, ADEP, (E-File)
Daniel R. Cox, ADEP, (E-File)
Victoria A. George, REG-DO, (E-File)

Mr. John E. Kieling
ENV-DO-14-0219

- 3 -

Cy (Continued):

Kenneth M. Hargis, LTP-PTS, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
Paul Schumann, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatsteam@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)

ENCLOSURE 1

August 13, 2014, LANL Concurrence Letter to WIPP

ENV-DO-14-0219

LAUR-14-26308

Date: AUG 21 2014



Associate Director for ESH
Environment, Safety, and Health
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Los Alamos, New Mexico 87545
505-667-4218/Fax 505-665-3811

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(505) 667-5794/Fax (505) 667-5948

Date: **AUG 13 2014**
Ref: ADESH-14-041

J. R. Stroble, Acting Assistant Manager
Office of Program Management
Carlsbad Field Office
U. S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Stroble,

Subject: Written Concurrence for Correction of Waste Manifests

The purpose of this letter is to follow up our recent conversation regarding a discrepancy on manifests for containers (see attachment) that were shipped from the Los Alamos National Laboratory (LANL) to the Waste Isolation Pilot Plant (WIPP). The containers were received at the WIPP facility between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests (see attachment). WIPP accepted the shipments for disposal, and the manifests were returned to LANL without any discrepancies identified. Due to recent events at WIPP, and re-evaluation of Acceptable Knowledge information, the Carlsbad Field Office (CBFO) notified LANL that there was a manifest discrepancy based on WIPP's determination that nitrate salt-bearing waste containers required application of the EPA Hazardous Waste Number D001 and DOT subsidiary Hazard Division 5.1. Further, CBFO requested concurrence from LANL that the manifests can be corrected pursuant to Section C-5b(1) of the WIPP Waste Analysis Plan (the WAP) which provides that errors on a manifest can be corrected by WIPP with a verbal (followed by a mandatory written) concurrence by the generator/storage site technical contact. This letter provides that written concurrence.

At the time LANL shipped the containers to WIPP, the manifests identified the hazardous waste numbers and hazard class determined to be appropriate at that time based on acceptable knowledge. Due to the recent events at WIPP, LANL has been re-evaluating the characterization of the waste stream. On July 30, 2014, the Department of Energy, National Nuclear Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS) notified the New Mexico Environment Department that LANL had decided to provisionally apply EPA Hazardous Waste

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National Nuclear Security Administration of the U.S. Department of Energy

Number D001 for the characteristic of ignitability to certain nitrate salt-bearing waste containers stored at LANL.

We are continuing to re-evaluate the waste characterization information concerning these nitrate salt waste streams, and will keep you updated as to new relevant information. If you have questions please contact Michael Brandt (LANS) at (505) 667-4218, or Pete Maggiore (DOE) at (505) 665-5025.

Sincerely,



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC



Peter Maggiore
Assistant Manager
Environmental Projects Office
Los Alamos Field Office

Enclosures: (1) List of Manifests Requiring Correction

Cy: Kimberly Davis Lebak, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Kirsten M. Laskey, 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)
Raeanna R. Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Jeffery D. Mousseau, ADEP, (E-File)
Daniel R. Cox, ADEP, (E-File)
Victoria A. George, REG-DO, (E-File)
Anthony R. Grieggs, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
Debra Nevergold, LTP, (E-File)
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List of applicable manifest numbers, shipment numbers, dates of receipt and container numbers from Waste Stream LA-MIN02-V.001				
Manifest Number	Shipment Number	Received	Container Number	Container Count
001600826GBF	IN130186	8-Sep-13	LA00000062547	1
001600826GBF	IN130186	8-Sep-13	LA00000063116	2
001600826GBF	IN130186	8-Sep-13	LA00000063198	3
001600826GBF	IN130186	8-Sep-13	LA00000063497	4
001600826GBF	IN130186	8-Sep-13	LA00000064665	5
001600826GBF	IN130186	8-Sep-13	LA00000064863	6
001600826GBF	IN130186	8-Sep-13	LAS822714	7
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010784176JJK	LA130125	29-Aug-13	LA00000092347	10
010784176JJK	LA130125	29-Aug-13	LA00000092555	11
010784176JJK	LA130125	29-Aug-13	LA00000093588	12
010784176JJK	LA130125	29-Aug-13	LA00000093589	13
010784179JJK	LA130128	3-Sep-13	LA00000092220	14
010784180JJK	LA130129	4-Sep-13	LA00000092140	15
010784180JJK	LA130129	4-Sep-13	LA00000092219	16
010784180JJK	LA130129	4-Sep-13	LA00000092235	17
010784180JJK	LA130129	4-Sep-13	LA00000092495	18
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010784182JJK	LA130131	6-Sep-13	LA00000092251	27
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010784234JJK	LA130175	20-Nov-13	LA00000068458	205
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010784234JJK	LA130175	20-Nov-13	LA00000068467	207
010784234JJK	LA130175	20-Nov-13	LA00000068468	208
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