Mr. Steve Zappe, WIPP Project Leader  
Hazardous Waste Permits Program  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 E. Rodeo Park Dr. Bldg. 1  
Santa Fe, New Mexico 87505-6303

Subject: Report of Manifest Discrepancies, Hazardous Waste Facility Permit Number NM4890139088-TSDF

Dear Mr. Zappe:

The purpose of this letter is to report two significant manifest discrepancies as required by Section B-4b(2)(i) of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) Number: NM4890139088-TSDF. These discrepancies were identified post-receipt and were not identifiable during the Phase I Waste Stream Screening and Verification or Phase II Waste Shipment Screening and Verification required by WIPP HWFP actions B-4b(1) and B-4b(2) respectively.

On November 8, 2003, during a pre-shipment data review, Central Characterization Project (CCP) personnel discovered a waste stream identification data entry error in the WIPP Waste Information System (WWIS) for one container in a pending shipment. Following the discovery of this data entry error, CCP personnel conducted a review of all CCP container data that have been entered into the WWIS. On November 12, 2003, it was determined that incorrect waste stream identification data for seven additional containers had been entered into the WWIS. Of these seven containers, five have been shipped to WIPP.

As a result of these waste stream data entry errors, we have concluded that fourteen EPA Hazardous Waste Numbers were not listed on the Uniform Hazardous Waste Manifests for shipment SR030117, received at the WIPP on August 5, 2003, and shipment SR 030119, received at the WIPP on August 7, 2003. The following provides the related specific information:

Shipments Number SR030117, Manifest Item 11.a., TRUPACT-II #144; the Ten-Drum Overpack (TDOP) Container #SRTP00288, received in TRUPACT-II #144 contained 10 fifty-five gallon waste drums assigned to WSPF SR-W027-221F-HET. Two of these drums (indicated below in bold) are from waste stream SR-W027-FB-Pre86-C.
Shipment Number SR030119, Manifest Item 11.a., TRUPACT-II #134; the TDOP Container #SRTP00294, in TRUPACT-II #134 contained 10 fifty-five gallon waste drums assigned to WSPF SR-W027-221F-HETA. Three of these drums (indicated below in bold) are from waste stream SR-W027-FB-Pre86-C;

The following actions have been or will be taken to resolve the discrepancy:

- Completed the review of the characterization data on the five drums and have determined that they were adequately characterized and are from an approved waste stream SR-W027-FB-Pre86-C.

- Completed the evaluation by the Acceptable Knowledge Expert, and will re-assign drums within TDOPs SRTP00288 and SRTP00294 to SR-W027-FB-Pre86-C.

- Correct manifests and WWIS to add the required EPA Hazardous Waste Numbers and appropriate waste stream identification numbers in accordance with the HWFP Section B-4 Data Verification and Quality Assurance.

Copies of the manifests at issue are attached.
If you have any questions regarding this matter, please contact Mr. Kerry Watson at 234-7357 or 706-0066.

Sincerely:

Inés Triay, CBFO Manager
U. S. Department of Energy

CC:
S. Martin, NMED HWB
B. Forinash, EPA ORIA
E. Rose, CBFO
K. Watson, CBFO
D. Bignell, WRES
G. Johnson, WTS
F. Sharif, WTS
K. Jackson, WTS
D. Kump, WTS
D. Speed, WTS
CBFO M&RC

Sincerely:

Steven D. Warren, General Manager
Washington TRU Solutions LLC
# UNIFORM HAZARDOUS WASTE MANIFEST

<table>
<thead>
<tr>
<th>Field</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Generator's US EPA ID No.</td>
<td>MAN1Doc 117</td>
</tr>
<tr>
<td>2. Page 1 of 1</td>
<td>Information in the shaded areas is not required by Federal law, but is by State Law</td>
</tr>
<tr>
<td>3. Generator's Name and Mailing Address</td>
<td>Westinghouse Savannah River Company, Bldg. 705-3C Savannah River Site, Aiken, SC 29808 Attn: Lynn Martin</td>
</tr>
<tr>
<td>4. Generator's Phone</td>
<td>(803) 725-3333 (24 hour emergency number)</td>
</tr>
<tr>
<td>5. Transporter 1 Company Name</td>
<td>Tri-state Motor Transit Company</td>
</tr>
<tr>
<td>6. U.S. EPA ID Number</td>
<td></td>
</tr>
<tr>
<td>7. Transporter 2 Company Name</td>
<td></td>
</tr>
<tr>
<td>8. U.S. EPA ID Number</td>
<td></td>
</tr>
<tr>
<td>9. Designated Facility Name and Site Address</td>
<td>Waste Isolation Pilot Plant, Carlsbad, NM 88220</td>
</tr>
<tr>
<td>10. U.S. EPA ID Number</td>
<td></td>
</tr>
<tr>
<td>11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)</td>
<td>a. RO Waste Radioactive Material, n.o.s., 7 UN2982, Pu-238 Pu-239 Pu-240 Pu-241 Am-241</td>
</tr>
<tr>
<td>13. Total Quantity</td>
<td>F-85 0.005 TBq, Also RQ(F001 F002) 0 0 1 C</td>
</tr>
<tr>
<td>14. Unit wv</td>
<td></td>
</tr>
<tr>
<td>15. Additonal Descriptions for Materials Listed Above</td>
<td>a.</td>
</tr>
<tr>
<td>16. Special Handling Instructions and Additional Information</td>
<td>If undeliverable, return to generator. WSRC BOL# SRS-19669 Send Certificate of Destruction and Manifest Discrepancies to: Leah Lavallee, 803-952-2087, Bldg. 724-35E Aiken, SC 29808 LDR Notification on File 141# VZD- VPA-167</td>
</tr>
<tr>
<td>17. Transporter 1 Acknowledgment of Receipt of Materials</td>
<td>Printed / Typed Name: F. O. Wooldridge, On behalf of WSRC, Co-Operator Signature: F.D. Wooldridge, On behalf of WSRC, Co-Operator Month Day Year: 10/8/04/103</td>
</tr>
<tr>
<td>18. Transporter 2 Acknowledgment of Receipt of Materials</td>
<td>Printed / Typed Name: Signature: Month Day Year: 10/10/109</td>
</tr>
<tr>
<td>19. Discrepancy Indication Space</td>
<td></td>
</tr>
<tr>
<td>20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19</td>
<td>Printed / Typed Name: Aly Williams Signature: Aly Williams Month Day Year: 10/18/05/103</td>
</tr>
</tbody>
</table>

**Note:** The above text is a sample of the UNIFORM HAZARDOUS WASTE MANIFEST form, which includes various fields for information such as generator and transporter details, hazardous waste descriptions, and additional notes. The form is designed to be filled out by generators and transporters handling hazardous materials, ensuring compliance with federal and state regulations.
### UNIFORM HAZARDOUS WASTE MANIFEST

#### 1. Generator's US EPA ID No.
- SC 18900898

#### 2. Page 1 of 1

#### 3. Generator's Name and Mailing Address
- Westinghouse Savannah River Company
- Bldg. 705-3C Savannah River Site
- Aiken, SC 29808
- Attn: Lynn Martin

#### 4. Generator's Phone
- (803) 725-3333

#### 5. Transporter 1 Company Name
- Tri-state Motor Transit Company

#### 6. U.S. EPA ID Number
- MOO005000

#### 7. Transporter 2 Company Name
- Washington TAU Solutions

#### 8. U.S. EPA ID Number
- MOO005000

#### 9. Designated Facility Name and Site Address
- Waste Isolation Pilot Plant

#### 10. U.S. EPA ID Number
- MOO005000

#### 11. U.S. DOT Description
- a. RQ Waste Radioactive Material, n.o.s., 7 UN2982, Pu-238, Pu-239, Pu-240, Pu-241, Am-241
- b. RQ Waste Radioactive Material, Fissile, n.o.s., 7 UN2918, Pu-238, Pu-239, Pu-240, Pu-241, Am-241
- c. RQ Waste Radioactive Material, Fissile, n.o.s., 7 UN2918, Pu-238, Pu-239, Pu-240, Pu-241, Am-241
- d. [Partial text]

#### 12. Containers
- a. [Partial text]
- b. [Partial text]
- c. [Partial text]
- d. [Partial text]

#### 13. Total Quantity
- [Partial text]

#### 14. UAW
- [Partial text]

#### 15. Special handling Instructions and Additional Information
- [Partial text]

#### 16. GENERATOR'S CERTIFICATION
- [Partial text]

### Printed / Typed Name
- W. L. Johnson, On behalf of WSRC, Co-Operator

### Signature
- [Signature]

### Month Day Year
- 05/11/99

## Additional Instructions
- [Partial text]