



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

NOV 11 2003



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 sections 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:

Shipment 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-HETA. Two of these drums (indicated below in bold) are from waste stream SR-W027-FB-Pre86-C.



TDOP CONTAINER # SRTP00288	
Drum #	WSPF
SR204608	WSPF SR-W027-FB-Pre86-C
SR235406	WSPF SR-W027-221F-HETA
SR235657	WSPF SR-W027-221F-HETA
SR257100	WSPF SR-W027-221F-HETA
SR257117	WSPF SR-W027-221F-HETA
SR257208	WSPF SR-W027-221F-HETA
SR264835	WSPF SR-W027-221F-HETA
SR264859	WSPF SR-W027-221F-HETA
SR264893	WSPF SR-W027-221F-HETA
SR504123	WSPF 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;

TDOP CONTAINER # SRTP00294	
Drum #	WSPF
SR100038	WSPF SR-W027-FB-Pre86-C
SR100149	WSPF SR-W027-FB-Pre86-C
SR118254	WSPF SR-W027-FB-Pre86-C
SR226954	WSPF SR-W027-221F-HETA
SR236167	WSPF SR-W027-221F-HETA
SR236195	WSPF SR-W027-221F-HETA
SR236519	WSPF SR-W027-221F-HETA
SR246577	WSPF SR-W027-221F-HETA
SR246660	WSPF SR-W027-221F-HETA
SR246714	WSPF SR-W027-221F-HETA

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.

Steve Zappe

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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



Steven D. Warren, General Manager
Washington TRU Solutions LLC

Enclosures (2)

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



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt
 2600 Bull Street, Columbia, SC 29201
 Phone: (803) 896-4000
 Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE (Form designed for use on elite[12-pitch] typewriter) Form Approved OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. S C 1 8 9 0 0 0 8 9 8 9 8 3 1 1 7	Manifest Document No. 3 1 1 7	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State Law
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3. Generator's Name and Mailing Address Westinghouse Savannah River Company Bldg. 705-3C Savannah River Site Aiken, SC 29808 Attn: Lynn Martin	A. State Manifest Document Number
4. Generator's Phone (803) 725-3333 (24 hour emergency number)	B. State Generator's ID
5. Transporter 1 Company Name Tri-state Motor Transit Company	C. State Transporter's ID
6. U.S. EPA ID Number M O R 0 0 0 5 0 5 3 4 7	D. Transporter's Phone 1-800-234-8768
7. Transporter 2 Company Name	E. State Transporter's ID
8. U.S. EPA ID Number	F. Transporter's Phone
9. Designated Facility Name and Site Address Waste Isolation Pilot Plant Washington TRU Solutions For the U.S. DOE 130 Miles SE of Carlsbad, JAL Highway Carlsbad, NM 88220	G. State Facility's ID
10. U.S. EPA ID Number N M 4 8 9 0 1 3 9 0 8 8	H. Facility's Phone 605-188-6884

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	Waste Number
a. RQ Waste Radioactive Material, n.o.s., 7 UN2982, Pu-238 Pu-239 Pu-240 Pu-241 Am-241 Waste Codes F001 F002 F003 F005 D008, SOLID / OXIDE, RADIOACTIVE YELLOW-II, TI=0.2 FISSILE EXCEPTED USA/9218B(U) F-85 0.005 TBq, Also RQ(F001 F002)	0 0 1	C M	0 1 3 3 2	K	F 0 0 1
b. RQ Waste Radioactive Material, n.o.s., 7 UN2982, Pu-238 Pu-239 Pu-240 Pu-241 Am-241 Waste Codes F001 F002 F003 F005 U002 U151 D005 D006 D007 D008 D009 D011 D018 D019 D022 D029 D039 D040 D043, SOLID / OXIDE, RADIOACTIVE YELLOW-II, TI=0.2 FISSILE EXCEPTED USA/9218B(U) F-85 0.103 TBq, Also RQ(F001 F002)	0 0 1	C M	0 1 2 8 5	K	F 0 0 1
c. RQ Waste Radioactive Material, n.o.s., 7 UN2982, Pu-238 Pu-239 Pu-240 Pu-241 Am-241 Waste Codes F001 F002 F003 F005 U002 U151 D005 D006 D007 D008 D009 D011 D018 D019 D022 D029 D039 D040 D043, SOLID / OXIDE, RADIOACTIVE YELLOW-II, TI=0.2 FISSILE EXCEPTED USA/9218B(U) F-85 0.161 TBq, Also RQ(F001 F002)	0 0 1	C M	0 1 2 6 9	K	F 0 0 1
d.					

J. Additional Descriptions for Materials Listed Above	K. Handling Codes for Wastes Listed Above
a. [] - [] - []	
b. [] - [] - []	
c. [] - [] - []	
d. [] - [] - []	

15. Special handling Instructions and Additional Information If undeliverable, return to generator. WSRC BOL# SRS-19699 Send Certificate of Destruction and Manifest Discrepancies to: Leah Lavallee, 803-952-2087, Bldg. 724-35E Aiken, SC 29808 LDR Notification on File 741# VZD-VPA-167	11a. TRUPACT # 144 11b. TRUPACT # 149 11c. TRUPACT # 188 SR030117
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Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to Chief, Information Policy Branch, PM-223, US Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed / Typed Name F. D. Wooldridge, On behalf of WSRC, Co-Operator	Signature <i>F.D. Wooldridge</i>	Month Day Year 10 8 0 4 0 3
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17. Transporter 1 Acknowledgment of Receipt of Materials Printed / Typed Name <i>Jemas Prater</i>	Signature <i>Jemas Prater</i>	Month Day Year 10 8 10 10 3
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18. Transporter 2 Acknowledgment of Receipt of Materials Printed / Typed Name	Signature	Month Day Year
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19. Discrepancy Indication Space

11a - 2438 lbs
11b - 2833 lbs
11c - 2797 lbs AW 9/17/03

20. Facility Owner or operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed / Typed Name ALVY WILLIAMS	Signature <i>Alvy Williams</i>	Month Day Year 10 8 10 15 0 3
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9. Designated Facility Name and Site Address Waste Isolation Pilot Plant Washington TRU Solutions For the U.S. DOE 130 Miles SE of Carlsbad, JAL Highway Carlsbad, NM 88220						E. State Transporter's ID			
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a. RQ Waste Radioactive Material, n.o.s., 7 UN2982, Pu-238 Pu-239 Pu-240 Pu-241 Am-241 Waste Codes F001 F002 F003 F005 D008, SOLID / OXIDE, RADIOACTIVE YELLOW-II, TI=0.2 FISSILE EXCEPTED USA/9218B(U) F-85 0.031 TBq, Also RQ(F001 F002)						0 0 1 C M		0 1 2 6 7 K	
b. RQ Waste Radioactive Material, Fissile, n.o.s., 7 UN2918, Pu-238 Pu-239 Pu-240 Pu-241 Am-241 Waste Codes F001 F002 F003 F005 U002 U151 D005 D006 D007 D008 D009 D011 D018 D019 D022 D029 D039 D040 D043, SOLID / OXIDE, RADIOACTIVE YELLOW-II, TI=0.2 USA/9218B(U) F-85 0.163 TBq, Also RQ(F001 F002)						0 0 1 C M		0 1 3 0 1 K	
c. RQ Waste Radioactive Material, Fissile, n.o.s., 7 UN2918, Pu-238 Pu-239 Pu-240 Pu-241 Am-241 Waste Codes F001 F002 F003 F005 U002 U151 D005 D006 D007 D008 D009 D011 D018 D019 D022 D029 D039 D040 D043, SOLID / OXIDE, RADIOACTIVE YELLOW-II, TI=0.2 USA/9218B(U) F-85 0.227 TBq, Also RQ(F001 F002)						0 0 1 C M		0 1 3 0 3 K	
d.									
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above			
15. Special handling Instructions and Additional Information If undeliverable, return to generator. WSRC BOL# SRS-19701 Send Certificate of Destruction and Manifest Discrepancies to: Leah Lavallee, 803-952-2087, Bldg. 724-35E Aiken, SC 29808 LDR Notification on File 741# VZD-VPA-169						11a. TRUPACT # 134 11b. TRUPACT # 156 11c. TRUPACT # 199 SR030119			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to Chief, Information Policy Branch, PM-223, US Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503			
Printed / Typed Name W. L. Johnson, On behalf of WSRC, Co-Operator			Signature <i>W. L. Johnson</i>		Month Day Year 10 8 10 13				
17. Transporter 1 Acknowledgment of Receipt of Materials Printed / Typed Name <i>Randy Westcott</i>			Signature <i>Randy Westcott</i>		Month Day Year 10 8 10 13				
18. Transporter 2 Acknowledgment of Receipt of Materials Printed / Typed Name			Signature		Month Day Year				
19. Discrepancy Indication Space 11a 2794 lbs 11b 2867 lbs 11c 2872 lbs									
20. Facility Owner or operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed / Typed Name <i>GA BURNS</i>						Signature <i>GA Burns</i>		Month Day Year 10 8 10 13	