



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: JUN 30 2014
Symbol: ENV-DO-14-0141
LAUR: 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

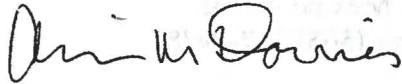
The purpose of this letter is to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of a waste characterization discrepancy as required by the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). Permit Section 2.4.7(4) states the Permittees shall 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.

On February 28, 2014, a hazardous waste shipment was sent to Veolia ES Technical Solutions under an incorrect waste number and waste profile. Additionally, the correct waste profile was missing an Environmental Protection Agency (EPA) Hazardous Waste Number. The discrepancy was discovered by Veolia ES Technical Solutions after the original manifest had been returned to the Permittees; therefore, the return manifest did not include a discrepancy. On May 7, 2014, the Permittees were notified by Veolia ES Technical Solutions via email of these discrepancies and the necessary changes were made by LANL to correct the off-site waste profile form (345606) and to include the additional waste number (D002, corrosivity). The amended waste profile form is included as Enclosure 1.

The Permittees did not notify the NMED-HWB within three days. As a result, the Permittees will include this discrepancy in the 2014 Report of Noncompliance as required by Permit Section 1.9.14.

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: Waste Information Profile Form # 345606

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 Maggione, 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)
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ENV-CP Correspondence File, (E-File)

ENCLOSURE 1

Waste Information Profile Form # 345606

ENV-DO-14-0141

Date: JUN 3 0 2014



WASTESTREAM INFORMATION PROFILE

WIP NO. 345606

Disposal Code

Recertification

Veolia Location HENDERSON FACILITY HENDERSON CO OFFICE CITY ST

Invoice Address

Veolia TSDf requested Technology requested Generator No. 426268 Generator EPA ID No. NM0890010515 1. Generator Name LOS ALAMOS NATIONAL LABORATORY Generator State No. Address TA 54 MESITA DEL BUEY ,PO State Wastestream No. BOX 1663 MS J595 City LOS ALAMOS State NM Country US ZIP 87545-2201 SIC Code 8734 NAICS Codes Source Code G09 Origin 1 Form W219 System Type

2. Waste Name WASTE SOLVENTS, ACIDS, WATER Lab or Waste Area

3. Process Generating Waste ORGANIC REACTIONS

4. Shipping Name FLAMMABLE LIQUIDS, CORROSIVE, n.o.s.

Hazard Class 3 UN/NA No. UN2924 PG 1 RQ amt 100 lb Waste: Y PIH: N IH: N DWW: N P: N

Wastewater Yes X No

RQ Desc: 1. D001 2. D002

DOT Desc: 1. ETHANOL, NITRIC ACID, DICHLOROETHANE 2.

5. Waste Codes Sub Category

D001 IL D002 D028 F002 F003 NA F005 NA

6. Physical and Chemical Properties (check all that apply)

pH a < 2 b 2 - 5 c 5 - 9 d 9 - 12.5 e > 12.5 0.0 - 0.0 other Specific Gravity a < 0.8 b X 0.8 - 1.0 c 1.0 d 1.0 - 1.2 e > 1.2 other Flash Point (F) a < 80 b X 80 - 100 c 100 - 140 d 140 - 200 e > 200 f no flash other Solids 0 - 0 % suspended 0 - 0 % settleable 0 - 0 % dissolved 0 - 0 % ash 0 - 0 % water solubility 0 - 0 BTU/lb Free Liquid Range 100 to 100%

Physical State

s _ solid
 m _ semi-solid
 l liquid
 p _ pumpable semi-solid
 f _ flowable powder
 g _ gas
 a _ aerosol
 r _ pressurized liquid
 d _ debris per 40 CFR 268.45
 h _ sharps
 q _ pumpable liquid

Hazardous Characteristics

a _ air reactive
 w _ water reactive
 c _ cyanide reactive
 f _ sulfide reactive
 e _ explosive
 o _ oxidizing acid
 p _ peroxide former
 r _ radioactive or NRC regulated
 s _ shock sensitive
 t _ temp sensitive
 m _ polymerization/monomer
 n _ OSHA carcinogen
 i _ infectious
 h _ inhalation hazard
 Zone

Odor

a none
 b _ mild
 c _ strong
 describe

Halogens

Br 0.0 - 0.0 % Bromine
 Cl 0.0 - 0.0 % Chlorine
 F 0.0 - 0.00 % Fluorine
 I 0.0 - 0.0 % Iodine

Layers: a _ multilayered:

Top Layer

Viscosity _ high (syrup)
 by _ medium (oil)
 Layer: low (water)
 _ solid

b _ bi-layered:

Second Layer

_ high (syrup)
 _ medium (oil)
 _ low (water)
 _ solid

c single phase:

Bottom Layer

_ high (syrup)
 _ medium (oil)
 _ low (water)
 _ solid

Color

VAR

Used oil y/n HOC < 1000 ppm _ or HOC > 1000 ppm _

7. Chemical Composition

[M = Marine Pollutant, S = Severe Marine Pollutant, O = Ozone Depleting Substance, U = Underlying Hazardous Constituent, B = Benzene NESHP, T = TRI Chemical, C = OSHA Carcinogen]

Constituents	Range	Units
<u>U</u> <u>ACETONE</u> (% WITH TOLUENE, ETHANOL)	<u>10.00 - 12.00</u>	%
<u>T U</u> <u>ACETONITRILE</u> (% WITH DICHLOROMETHANE)	<u>3.00 - 4.00</u>	%
<u>M T U</u> <u>DICHLOROETHANE</u>	<u>.05 - .05</u>	%
<u>T U</u> <u>DICHLOROMETHANE</u> (% WITH ACETONITRILE)	<u>3.00 - 4.00</u>	%
<u>U</u> <u>ETHYL ACETATE</u> (% WITH SULFOLANE AND PROPANOL)	<u>10.00 - 15.00</u>	%
<u>U</u> <u>ETHYL ALCOHOL</u> (% WITH TOLUENE AND ACETONE)	<u>10.00 - 12.00</u>	%
<u>I</u> <u>HYDROCHLORIC ACID SOLUTION</u>	<u>2.00 - 8.00</u>	%
<u>I</u> <u>PROPANOL</u> (% WITH ETHYL ACETATE AND SULFOLANE)	<u>10.00 - 15.00</u>	%
<u>I</u> <u>METHYLPYRROLIDONE</u>	<u>6.00 - 7.00</u>	%
<u>I</u> <u>NITRIC ACID (70% OR LESS)</u> (% WITH SULFURIC ACID)	<u>7.00 - 10.00</u>	%
<u>U</u> <u>SULFOLANE</u> (% WITH ETHYL ACETATE AND PROPANOL)	<u>10.00 - 15.00</u>	%
<u>I</u> <u>SULFURIC ACID</u> (% WITH NITRIC ACID)	<u>7.00 - 10.00</u>	%
<u>T U</u> <u>TOLUENE</u> (% WITH ETHANOL AND ACETONE)	<u>10.00 - 12.00</u>	%
<u>U</u> <u>WATER</u>	<u>38.00 - 39.00</u>	%

Total Composition Must Equal or Exceed 100%

Other

8. Is the wastestream being imported into the USA? Yes _ No
9. Does the wastestream contain PCBs regulated by 40CFR?
 PCB concentration 0.00 ppm Yes _ No
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes _ No
11. Is the wastestream subject to Benzene NESHP? Yes _ No
- If yes...

- Is the wastestream subject to Notification and Control Requirements? Yes No
- Benzene concentration 0.00 ppm
- Does it contain >= 10% water? Yes No
- What is the TAB at your facility? 0.00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes No
- Volatile organic concentration, if known 0.00 ppmw
- CC approved analytical method Generator Knowledge
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes No

14. **Container Information** (Identify UN container marking if known)

Packaging: Bulk Solid Type/Size: Bulk Liquid Type/Size: Drum Type/Size:

Other _____

Shipping Frequency: Units 4.00 Per Month Quarter Year One Time Other

UOM Drums Description

15. **Additional Information**

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

NAME (PRINT OR TYPE)

PHONE

DATE

SIGNATURE

TITLE

FACILITY NOTIFICATION

If approved for management, Veolia Environmental Services has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.



COPY



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