



Associate Director for ESH
 Environment, Safety, and Health
 P.O. Box 1663, MS K491
 Los Alamos, New Mexico 87545
 505-667-4218/Fax 505-665-3811

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: **JUL 30 2014**
 Ref: ADESH-14-032

John Kieling, Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

Mr. Tom Blaine, Division Director
 Environmental Health Division
 Harold Runnels Building
 1190 Saint Francis Drive, Room 4050
 Santa Fe, NM 87502-5469

Dear Mr. Kieling and Mr. Blaine,

Subject: Written Notice Regarding Application of EPA Hazardous Waste Number D001 to Certain Nitrate Salt Bearing Waste Containers at the Los Alamos National Laboratory

The purpose of this letter is to provide you written notice that the Department of Energy, National Nuclear Administration (DOE/NNSA) the owner and co-operator of LANL (EPA ID Number NM 0890010515), and Los Alamos National Security, LLC (LANS), co-operator ("the Permittees") under LANL Hazardous Waste Facility Permit (EPA No. NM0890010515) are provisionally applying EPA Hazardous Waste Number D001 for the characteristic of ignitability to 57 remediated nitrate salt-bearing waste containers and 29 un-remediated nitrate salt-bearing waste containers stored at LANL.

The LANL Permit, at Section 2.4.7, requires the Permittees to ensure that the "initial characterization of any hazardous waste stream managed under this Permit is reviewed or repeated to verify that the characterization is accurate and up-to-date" (40 CFR §264.13(b)(4)). Permit Section 2.4.7(2) requires the Permittees to "Recharacterize hazardous wastes whenever there is a change in the waste generating processes which includes a change in the status of the waste for purposes of Land Disposal Restrictions or when analytical results indicate a change in the waste stream."

The Permittees are reevaluating the waste characterization information concerning these nitrate salt waste streams. This reevaluation includes factual review, scientific analysis, and testing. Pending completion of this reevaluation, Permittees are conservatively adding the D001 waste number. Because this reevaluation is ongoing, the application of D001 is considered provisional and may change to include and/or remove containers/waste streams in the future.

PO Box 1663, MS A100, Los Alamos, NM 87545
 505-667-5101 / FAX 505-665-2679

An Equal Opportunity Employer / Operated by Los Alamos National Security, LLC for the
 National Nuclear Security Administration of the U.S. Department of Energy

Mr. John E. Kieling and Mr. Tom Blaine - 2 -
ADESH-14-032

We will keep you informed as our reevaluation continues. If you have comments or questions regarding this submittal, please contact Mark P. Haagenstad at (505) 665-2014 or Gene E. Turner at (505) 667-5794.

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

Cy: Ryan Flynn, 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)
Kimberly Davis Lebak, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Kirsten 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)
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)
Bill D. Zwick, MQ, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)

COPY

RECEIVED

JUL 31 2014



**NMED
Hazardous Waste Bureau**

Associate Director for ESH
Environment, Safety, and Health
P.O. Box 1663, MS K491
Los Alamos, New Mexico 87545
505-667-4218/Fax 505-665-3811

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: **JUL 30 2014**
Ref: ADESH-14-032

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Mr. Tom Blaine, Division Director
Environmental Health Division
Harold Runnels Building
1190 Saint Francis Drive, Room 4050
Santa Fe, NM 87502-5469

Dear Mr. Kieling and Mr. Blaine,

Subject: Written Notice Regarding Application of EPA Hazardous Waste Number D001 to Certain Nitrate Salt Bearing Waste Containers at the Los Alamos National Laboratory

The purpose of this letter is to provide you written notice that the Department of Energy, National Nuclear Administration (DOE/NNSA) the owner and co-operator of LANL (EPA ID Number NM 0890010515), and Los Alamos National Security, LLC (LANS), co-operator ("the Permittees") under LANL Hazardous Waste Facility Permit (EPA No. NM0890010515) are provisionally applying EPA Hazardous Waste Number D001 for the characteristic of ignitability to 57 remediated nitrate salt-bearing waste containers and 29 un-remediated nitrate salt-bearing waste containers stored at LANL.

The LANL Permit, at Section 2.4.7, requires the Permittees to ensure that the "initial characterization of any hazardous waste stream managed under this Permit is reviewed or repeated to verify that the characterization is accurate and up-to-date" (40 CFR §264.13(b)(4)). Permit Section 2.4.7(2) requires the Permittees to "Recharacterize hazardous wastes whenever there is a change in the waste generating processes which includes a change in the status of the waste for purposes of Land Disposal Restrictions or when analytical results indicate a change in the waste stream."

The Permittees are reevaluating the waste characterization information concerning these nitrate salt waste streams. This reevaluation includes factual review, scientific analysis, and testing. Pending completion of this reevaluation, Permittees are conservatively adding the D001 waste number. Because this reevaluation is ongoing, the application of D001 is considered provisional and may change to include and/or remove containers/waste streams in the future.

PO Box 1663, MS A100, Los Alamos, NM 87545
505-667-5101 / FAX 505-665-2679

An Equal Opportunity Employer / Operated by Los Alamos National Security, LLC for the
National Nuclear Security Administration of the U.S. Department of Energy