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: AUG 0 5 2014
Symbol: ENV-DO-14-0187
LAUR: 14-25441
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 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 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.

The Permittees shipped a non-regulated liquid waste container W743555 to Veolia ES Technical Solutions, LLC in Colorado on May 28, 2014 and shipment was received on June 12, 2014. The manifest was returned to the Permittees thereafter without any discrepancies. In accordance with normal operations at the treatment storage and disposal facility (TSDF) the pH levels were measured at 13.2. On June 20, 2014 the Permittees received a notification from Veolia ES Technical Solutions, LLC stating that the pH of the container (W743555) was higher than the waste profile allowed and was a hazardous waste.

On June 23, 2014, the Permittees provided the NMED-HWB with an email notification which served as the three day notice per Permit Section 2.4.7(4). As a result of the notification, the NMED-HWB requested additional information and the responses are as follows:

1. The unique waste stream identifier for the subject stream
   See the attached Enclosure 1

2. The active waste profile form for the stream at the time of the notification
   See the attached Enclosure 1

3. Documentation for the basis of the waste profile (analytical data if available, or documentation supporting the use of AK)
   See the attached Enclosure 1

4. The date and result of the most recent characterization review
   The most recent characterization review was conducted on January 14, 2014.

5. The location where the stream is generated (if not included on the WPF)
   Technical Area (TA) - 03, Building 40

6. A detailed description of the waste steam generation process that includes all relevant material inputs or other information that identifies the chemical content and physical form of the waste
   Container W743555 was sent for disposal under Waste Stream ID 21264, propylene glycol and water from a closed loop chiller process. The waste stream was described as containing 40-60% propylene glycol and 0.01-40% water. The total amount of waste was 100 mL (3.4 oz.).

7. A description of the variability of the waste stream or process that might cause pH differences
   The waste was improperly characterized by the waste generator. Container W743555 actually contained 45-55% propylene glycol and 45-55% aqueous potassium hydroxide. The waste should have been disposed of under an alternate Waste Stream ID 36130.

8. A history of the stream (*i.e.*, when first generated, approximate quantities generated per month, the number and times of off-site shipment)
   In November 2011 a hydrogen generator was taken offline because potassium hydroxide that had been used in the generator was corroding copper lines in the system. Propylene glycol was used in the hydrogen generator as a coolant.

   When it was discovered that the copper lines were breached, a sample of the propylene glycol was collected to determine if it had been contaminated with potassium hydroxide. This sample is the 100 ml that is mentioned above (Comment 6).

   In late April of 2012, 25 gallons of potassium hydroxide contaminated propylene glycol were evacuated from the hydrogen generator and drained into a 30 gallon drum. The 100 mL sample was stored in one of the group's laboratories and never returned to be disposed of with the 30 gallon drum. A request for disposal of the 30 gallon drum was submitted under Waste Stream ID 36130 (see comment # 7) on June 28, 2012 and the drum was transported to TA-54, Area L, on July 9, 2012.

   On March 19, 2013, the waste generator requested disposal of the 100 mL sample under waste stream ID 21264 (propylene glycol and water) which belonged to a different waste generator. On March 28, 2013, the waste generator was instructed by the waste management coordinator to obtain permission from the generator of waste stream ID 21264 for use of his waste profile and to ensure that the waste matched the waste profile criteria. On April 2, 2013, the waste generator obtained permission from the generator of waste

stream ID 21264 and confirmed that the waste was in fact propylene glycol and water, matching the waste stream ID 21264.

The generator failed to properly characterize the waste and submitted the request for disposal under Waste Stream ID 21264 instead of Waste Stream ID 36130.

9. Steps taken to recharacterize the waste stream as required by Permit Section 2.4.7 (4) prior to any future off-site shipments (including analytical data if available, or documentation supporting the use of AK)
   All waste from the hydrogen generator has been properly disposed. There is no longer any amount of the propylene glycol and aqueous potassium hydroxide waste in storage or use.

   The Corrective Actions to prevent this occurrence will require waste generators to test the pH of their waste streams prior to submitting a waste disposal request and waste streams must be sampled at a minimum of once per year to ensure that the waste meets the criteria established on the waste profile for the waste.

10. What checks (and results), in addition to pH, were performed by the TSDF when the pH variance was identified
    In accordance with the email sent to the Permittees on July 15, 2014, the types of checks performed on the waste included a basic fingerprint analysis. The pH was also measured using a strip and a probe, a visual of the waste was conducted, as well as a test to determine if the waste was flammable. If the waste burned then a flash point was conducted.

11. An explanation of why an antifreeze might be, or need to be, so basic
    Propylene glycol had been contaminated with potassium hydroxide, creating elevated pH levels.

12. A listing of the rules violated due to the mischaracterization of the stream
    The generator improperly characterized the waste stream as required by Permit Section 2.4.1. As a result, the generator failed to make a hazardous waste determination in accordance with 40 CFR 262.11.

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 1: Waste Profile Form

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 Maggiore, 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)
Robert L. Dodge, WM-DO, (E-File)
Ronnie A. Garcia, WM-SVS, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Tammy A. Diaz, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)

COPY

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RECEIVED
AUG - 5 2014
NMED
Hazardous Waste Bureau

Mr. John E. Kieling
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New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

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2. The active waste profile form for the stream at the time of the notification
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ENCLOSURE 1

Waste Profile Form

ENV-DO-14-0187

LAUR-14-25441

Date: AUG 0 5 2014

RECD MAR 1 3 2006

ORIGINAL

WASTE PROFILE FORM

Contact (if other than given below)	For rapid processing, complete all sections in black or blue ink and mail to: SOLID WASTE OPERATIONS GROUP at MS J595. For assistance with completing this form, call SOLID WASTE OPERATIONS GROUP at 5-4000.	Reference Number 39184 (For SOLID WASTE OPERATIONS GROUP use only.)

Generator's Z Number	Waste Generator's Name (print)		WMC's Z Number	WMC's Name (print)		
167875	Christopher Romero		193789	Sunee Sandoval		
Generator's Telephone	**Generator's Mail Stop**	**Waste Generating Group**	**Waste Stream Technical Area**	**Building**	**Room**	**WMC Telephone**
5-3978	D429	MST-11	3	40	A11	606-1460

Waste Accumulation (Check only one.)	☐ Satellite Accumulation Area	Site no:	☐ PCBs Storage Area	Site no:	
	☐ Less-than-90-days Storage Area	Site no:	☐ NM Special Waste	Site no:	
	☐ TSDF	Site no:	☐ Rad Staging Area	Site no:	
	☐ Universal Waste Storage Area	Site no:	☐ Rad Storage Area	Site no:	
	☐ Used Oil for Recycle	Site no:	☒ None of the Above		
ER Use Only	☐ ER Site	SWMU/AOC #:			

Method of Characterization (Check as many as apply.)	☐ Chemical/Physical Analysis	☐ Attached	Sample #:
	☐ Radiological Analysis	☐ Attached	Sample #:
	☐ PCB Analysis	☐ Attached	Sample #:
	☐ Acceptable Knowledge Documentation	☐ Attached	Documentation #:
	☒ MSDS	☐ Attached	

Section 1 – Waste Prevention/Minimization (answer all questions)

Can hazard segregation, elimination, or material substitution be used?	☐ Yes (Provide comments)	☒ No	
Can any of the materials in the waste stream be recycled or reused?	☐ Yes (Provide comments)	☒ No	
Has waste minimization been incorporated into procedures or other process controls?	☒ Yes	☐ No (Provide comments)	
Can this waste be generated outside a RCA?	☐ Yes (Provide comments)	☐ No	☒ N/A

Section 2 - Chemical and Physical Information

Waste Type (Check only one.)
- ☐ Unused/Unspent Chemical (Complete all sections as appropriate.)
- ☒ Process Waste/Spent Chemical/ Other (Complete all sections.)

Radiological Information

Was Waste Generated in a RCA?
☐ Yes ☒ No

- ☒ Non-radioactive
- ☐ Radioactive – Low Level
- ☐ Radioactive - Transuranic

Waste Destination (Check only one)
- ☐ SWWS (Complete Attachment 1)
- ☐ RLWTF (Complete Attachment 2)
- ☐ RLWTP (Complete Attachment 3)
- ☐ TA-16/HE (Complete Attachment 4)
- ☐ NTS (Complete Attachment 5)

Classification Information
- ☒ Unclassified
- ☐ Classified/Sensitive

Waste Category (Check all that apply.)
- ☒ Inorganic
- ☒ Organic
- ☐ Solvent *
- ☐ Degreaser *
- ☐ Dioxin
- ☐ Electroplating
- ☐ Treated Hazardous waste or residue
- ☐ No-Longer Contained-In
- ☐ Explosive process
- ☐ Infectious/Medical
- ☐ Biological
- ☐ Beryllium
- ☐ Empty Container (See instructions)
- ☐ Battery (See instructions)
- Asbestos ☐ friable ☐ non-friable

PCB Source Concentration
- ☐ PCB < 50 ppm
- ☐ PCB ≥ 50 - < 500 ppm
- ☐ PCB ≥ 500 ppm

- ☐ Hazardous Waste Contaminated Soil
- ☐ Untreated Hazardous Debris
- ☐ Commercial Solid Waste
- ☐ Other (Describe below)

* See instructions.

Waste Source (Check only one.)

Waste Source A
- ☐ Decon
- ☐ Materials Processing/Production
- ☒ Research/Development/Testing
- ☐ Scheduled Maintenance
- ☐ Housekeeping - Routine
- ☐ Spill Cleanup – Routine
- ☐ Sampling - Routine Monitoring
- ☐ Other (Describe below)

Waste Source B
- ☐ Abatement
- ☐ Construction/Upgrades
- ☐ Demolition
- ☐ Decon/Decom
- ☐ Investigative Derived
- ☐ Orphan/Legacy
- ☐ Remediation/Restoration
- ☐ Repacking (Secondary)
- ☐ Unscheduled Maintenance
- ☐ Housekeeping (Non-routine)
- ☐ Spill Cleanup (Non-routine)
- ☐ UST - Non-petroleum
- ☐ UST - Petroleum
- ☐ Other (Describe below)

Waste Matrix (Check only one.)

Gas
- ☐ ≤ 1.5 Atmospheres pressure
- ☐ > 1.5 Atmospheres pressure
- ☐ Liquefied compressed gas

Liquid
- ☒ Aqueous
- ☐ Non-aqueous
- ☐ Suspended Solids/ Aqueous
- ☐ Suspended Solids/ Non-aqueous

Solid
- ☐ Powder/Ash/Dust
- ☐ Solid
- ☐ Sludge
- ☐ Absorbed/solidified liquid
- ☐ Debris

Matrix Type (Check only one.)
- ☐ Homogeneous
- ☒ Heterogeneous (Describe below)

Estimated Annual Volume (m^3):

~~100 X10~~ $^{-3}$ .1

per unc 3/15/06

Section 3 – Process and Waste Descriptions

Process Description:

Propylene Glycol & water in a closed loop, a chiller process

Waste Description:

Propylene Glycol & Water

Section 4 – Characteristics

Ignitability (Check only one.)

(°F)	(°C)	
☐	< 73	< 22.8
☐	73 - 99	22.8 - 37.2
☐	100 - 139	37.8 - 59.4
☐	140 -200	60.0 - 93.3
☐	> 200	> 93.3

☐ EPA Ignitable – Non-liquid
☐ DOT Flammable Gas
☐ DOT Oxidizer
☒ Not ignitable

Corrosivity (Check only one.) (pH)

☐ ≤ 2.0
☐ 2.1 – 4.0
☐ 4.1 – 6.0
☐ 6.1 – 9.0
☐ 9.1 - 12.4
☐ ≥ 12.5
☐ Liquid corrosive to steel
☒ Non-aqueous

Reactivity (Check as many as apply.)

☐ RCRA Unstable
☐ Water Reactive
☐ Cyanide Bearing
☐ Sulfide Bearing
☐ Pyrophoric
☐ Shock Sensitive
☐ Explosive - DOT Div. _____
☒ Non-reactive

Boiling Point (Check only one.)

(°F)	(°C)	
☐	≤ 95	≤ 35
☐	> 95	> 35

☒ Not applicable

Identify for all contaminants listed.	Characterization Method: AK	TCLP	Total	None or Non-detect	Concentration of Contaminants: Contaminant present at Minimum to Maximum	Regulatory Limit
Toxicity Characteristic Metals					(10,000 ppm = 1%)	
Arsenic	☐	☐	☐	☐	_____ to _____ ppm	5.0 ppm
Barium	☐	☐	☐	☐	_____ to _____ ppm	100.0 ppm
Cadmium	☐	☐	☐	☐	_____ to _____ ppm	1.0 ppm
Chromium (Total)	☐	☐	☐	☐	_____ to _____ ppm	5.0 ppm
Lead	☐	☐	☐	☐	_____ to _____ ppm	5.0 ppm
Mercury	☐	☐	☐	☐	_____ to _____ ppm	0.2 ppm
Selenium	☐	☐	☐	☐	_____ to _____ ppm	1.0 ppm
Silver	☐	☐	☐	☐	_____ to _____ ppm	5.0 ppm
Toxicity Characteristic Organics						
Benzene	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm
Carbon tetrachloride	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm
Chlorobenzene	☐	☐	☐	☐	_____ to _____ ppm	100.0 ppm
Chloroform	☐	☐	☐	☐	_____ to _____ ppm	6.0 ppm
o – cresol	☐	☐	☐	☐	_____ to _____ ppm	200.0 ppm
m – cresol	☐	☐	☐	☐	_____ to _____ ppm	200.0 ppm
p – cresol	☐	☐	☐	☐	_____ to _____ ppm	200.0 ppm
Cresol – mixed	☐	☐	☐	☐	_____ to _____ ppm	200.0 ppm
1,4-Dichlorobenzene	☐	☐	☐	☐	_____ to _____ ppm	7.5 ppm
1,2-Dichloroethane	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm
1,1-Dichloroethylene	☐	☐	☐	☐	_____ to _____ ppm	0.7 ppm
2,4-Dinitrotoluene	☐	☐	☐	☐	_____ to _____ ppm	0.13 ppm
Hexachlorobenzene	☐	☐	☐	☐	_____ to _____ ppm	0.13 ppm
Hexachlorobutadiene	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm
Hexachloroethane	☐	☐	☐	☐	_____ to _____ ppm	3.0 ppm
Methyl ethyl ketone	☐	☐	☐	☐	_____ to _____ ppm	200.0 ppm
Nitrobenzene	☐	☐	☐	☐	_____ to _____ ppm	2.0 ppm
Pentachlorophenol	☐	☐	☐	☐	_____ to _____ ppm	100.0 ppm
Pyridine	☐	☐	☐	☐	_____ to _____ ppm	5.0 ppm
Tetrachloroethylene	☐	☐	☐	☐	_____ to _____ ppm	0.7 ppm
Trichloroethylene	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm
2,4,5-Trichlorophenol	☐	☐	☐	☐	_____ to _____ ppm	400.0 ppm
2,4,6-Trichlorophenol	☐	☐	☐	☐	_____ to _____ ppm	2.0 ppm
Vinyl chloride	☐	☐	☐	☐	_____ to _____ ppm	0.2 ppm
Herbicides and Pesticides						
Chlordane	☐	☐	☐	☐	_____ to _____ ppm	0.03 ppm
2,4-D	☐	☐	☐	☐	_____ to _____ ppm	10.0 ppm
Endrin	☐	☐	☐	☐	_____ to _____ ppm	0.02 ppm
Heptachlor (& its epoxide)	☐	☐	☐	☐	_____ to _____ ppm	0.008 ppm
Lindane	☐	☐	☐	☐	_____ to _____ ppm	0.4 ppm
Methoxychlor	☐	☐	☐	☐	_____ to _____ ppm	10.0 ppm
Toxaphene	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm
2,4,5-TP (Silvex)	☐	☐	☐	☐	_____ to _____ ppm	0.5 ppm

Section 5 - Additional Constituents and Information

Additional Constituents and Contaminants. Please account for 100% of waste. Ranges should be given within guidelines of individual constituents. List all other constituents (including inerts) not identified above and attach any applicable analysis. No chemical formulas allowed in this field. Continue in Section 3 Additional Information as necessary. CAS Numbers are needed for all chemical constituents, for material without a CAS Number enter "No CAS Number." Contact Waste Services at 5-4000 for assistance.

CAS No.	Name of constituent	Minimum	Maximum
57-55-6	Propylene Glycol	40	60 %
	water	.01	40 %
			%
			%
			%
			%
			%
			%
			%
			%
			%
			%
	Total of max. ranges of this section and page 2	100	in %

Additional Information (Use additional sheet if necessary.)

If additional information is available on the chemical, physical, or radiological character of the waste not covered on this form, provide it below:

Section 6 - Work Control Documentation (answer all questions)

Do the procedures for this process cover how to manage this waste?	☒ Yes	☐ No (Provide comments)
Do the procedures for this process address controls to prevent changes to waste constituents and concentrations or addition or removal of waste to/from containers?	☒ Yes	☐ No (Provide comments)

Section 7 - Packaging and Storage Control

Describe how the waste will be packaged in according to the applicable WAC:

Will be packaged to meet the WAC

Identify the storage management controls that will be used for this waste stream: (check all that apply)

☐ Tamper indication devices
☒ Locked cabinet or building
☐ Limited use locks with log-in for waste
☐ Other (describe)

Section 8 – Waste Certification Statements (check only one)

☒ Waste appears to meet WAC chapter for: 17.2
☐ Waste stream needs exception/exemption for treatment, storage, or disposal at:
☐ Waste does not meet the criteria for any known TSDF. (DOE approval is required. Contact the Waste Management Program Office for assistance.)

WASTE GENERATOR CERTIFICATION: Based on my knowledge of the waste and/or chemical/physical analysis, I certify that the waste characterization information on this form is correct and that it meets the requirements of the applicable waste acceptance criteria. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature [signature] Date 02/15/06

WASTE CERTIFYING OFFICIAL: I have reviewed this form and any associated attachments and the characterization information provided appears to be complete and accurate. I certify, to the best of my knowledge, that the waste characterization information provided by the waste generator meets the requirements of the applicable WAC.

Signature [signature] Date 2/15/06

Los Alamos NATIONAL LABORATORY

WASTE PROFILE FORM

WPF #: 39184

21-Feb-2007 10:56 AM (Version: 1)

Generator :	Romero, Christopher MST-11	MS :	D429
WMC :	SANDOVAL, SUNEE WS-WA	MS :	D435
FROM :	NWIS-SWO	MS :	J962/5-4000

WASTE PROFILE (WPF) EXTENSION QUESTIONNAIRE

Our files indicate that your WPF#: 39184 was submitted approximately one year ago. Please review the attached copy and answer the following questions concerning your waste stream to determine whether to renew or void your WPF. Note: Only the generator can sign for the extension (to renew). Please return the signed questionnaire to NWIS-SWO at the address listed below. If your waste stream remains the same, your WPF will be extended for another year. Upon approval of this signed Extension Certification, you will receive a notice indicating that your WPF is valid for another year. If there are changes in your waste stream, a new WPF will need to be completed.

Are you currently the same generator as indicated above?

YES X NO _____

Are you currently producing the same type of waste as indicated on WPF#: 39184

YES X NO _____

If yes, please sign the Extension Certification below

If no, will you be producing the same type of waste in the near future?

YES _____ NO _____

If yes, please sign the Extension Certification below

If no, will you be producing a different type of waste?

YES _____ NO _____

If no, sign the Void Approval below to indicate that your WPF should be voided

If yes, please submit a new WPF, along with this memo. We will then void your previous WPF and process a new one

Extension Certification

I am producing or will produce the same type of waste as indicated in WPF# 39184 Based on my knowledge of the waste and/or chemical/physical analysis, I certify that the waste characterization information on this form is correct and that it meets the requirements of the applicable waste acceptance criteria. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Extension-> Signed [signature] Z# 167875 Date 02/27/07

Void Approval

I will no longer be generating or will be producing a different type or composition (a new WPF will be submitted) of waste as indicated in WPF# 39184

Void-> Signed _____ Date _____

NOTE: PLEASE FOLD AND STAPLE THE FORM TO THE LINE BELOW AND RETURN TO ADDRESS PROVIDED

TO: NWIS-SWO **MS: J962** **PHONE: 5-4000**

Los Alamos
NATIONAL LABORATORY

WASTE PROFILE FORM

WPF #: 39184

05-Mar-2007 03:05 PM (Version: 1)

Generator :	Romero, Christopher MST-11	MS :	D429
WMC :	SANDOVAL, SUNEE WS-WA	MS :	D435
FROM :	NWIS-SWO	MS :	J962/5-4000

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Are you currently the same generator as indicated above?
YES _____ NO _____
Are you currently producing the same type of waste as indicated on WPF#: 39184
YES _____ NO _____
If yes, please sign the Extension Certification below
If no, will you be producing the same type of waste in the near future?
YES _____ NO _____
If yes, please sign the Extension Certification below
If no, will you be producing a different type of waste?
YES _____ NO _____
If no, sign the Void Approval below to indicate that your WPF should be voided
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Extension Certification

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Extension-> Signed Christopher Romero Z# 167875 Date 4/02/07

Void Approval

I will no longer be generating or will be producing a different type or composition (a new WPF will be submitted) of waste as indicated in WPF# 39184

Void-> Signed Date

NOTE: PLEASE FOLD AND STAPLE THE FORM TO THE LINE BELOW AND RETURN TO ADDRESS PROVIDED

TO: NWIS-SWO **MS: J962** **PHONE: 5-4000**