

**Vigil-Holterman, Luciana R**

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**From:** Haagenstad, Mark P  
**Sent:** Thursday, August 14, 2014 5:26 PM  
**To:** Kieling, John, NMENV; Hall, Timothy, NMENV; Pullen, Steve, NMENV  
**Cc:** Brandt, Michael Thomas; Sharp-Geiger, Raeanna Racine; Dorries, Alison Marie; Grieggs, Tony; Mousseau, Jeffrey David; George, Victoria A; Torres, Enrique; Vigil-Holterman, Luciana R; Diaz, Tammy; Martinez, Angela M; Bacigalupa, Gian A; Schumann, Paul B; Hopkins, John K; Turner, Gene E; Maggiore, Peter; Nickless, David J  
**Subject:** Notification of Waste Profile Discrepancy Regarding Application of EPA Haz Waste Number D001  
**Attachments:** ADESH-14-042-R Williams Written Concurrence Correction Waste Manifests for Waste Shipped to Waste Control Specialists Facility.pdf

Dear Mr. Kieling:

**Subject: Notification of Waste Profile Discrepancy Regarding Application of EPA Hazardous Waste Number D001 to Nitrate-Salt-Bearing Waste Containers Shipped to Waste Control Specialists (WCS) From Los Alamos National Laboratory**

The purpose of this email 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). This regards a discrepancy on manifests for 119 nitrate-salt-bearing waste containers that were shipped by the Department of Energy and Los Alamos National Security, LLC (DOE/LANS) (the Permittees) to the Waste Control Specialists facility in Andrews, Texas.

Section 2.4.7, Waste Characterization Review, of the Permit states that the Permittees shall "...(4) [R]echaracterize a hazardous waste stream whenever the Permittees are notified by a receiving off-site facility that the characterization of a hazardous waste they obtained from the Permittees' Facility does not match a pre-approved waste analysis certification or accompanying waste manifest or shipping paper. The Permittees shall notify the Department in writing within three days of their receipt of the notice of the discrepancy from a receiving facility."

Since the 119 containers were shipped to WCS, WCS and the LANL Permittees have each made the decision to add the Environmental Protection Agency (EPA) Hazardous Waste Number D001 for ignitability to the LANL nitrate-salt-bearing waste containers at their respective facilities. As a result, the characterization of the containers WCS received from LANL no longer match the pre-approved waste analysis certifications that accompanied the waste manifests and shipping papers associated with the original off-site shipments.

Based on the DOE/LANS' written concurrence allowing WCS to correct the original manifests (see attached document), the Permittees are hereby notifying the Department of the newly-identified discrepancy, in accordance with Permit Section 2.4.7(4). This email constitutes notification with respect to the wastes associated with the referenced manifests.

If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or me at (505) 665-2014.

Mark Haagenstad  
Environmental Protection Division  
RCRA Permitting and Compliance Team Leader

Los Alamos National Security  
Los Alamos National Laboratory  
Office: (505) 665-2014  
Mobile: (505) 699-1733



*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: **AUG 14 2014**  
Ref: ADESH-14-042

Ryan Williams  
Vice President of Integrated Services  
Waste Control Specialists LLC  
Three Lincoln Centre  
5430 LBJ Freeway, Ste. 1700  
Dallas, Texas 75240

Dear Mr. Williams,

**Subject: Written Concurrence for Correction of Waste Manifests for Waste Shipped to Waste Control Specialists Facility**

The purpose of this letter is to follow up on our recent conversation regarding a discrepancy on manifests for containers (see attachment) that were shipped from the Los Alamos National Laboratory (LANL) to the Waste Control Specialists (WCS) facility in Andrews, Texas. The referenced containers were accepted by WCS for storage, and the manifests were returned to LANL without any discrepancies identified. At the time LANL shipped the containers to WCS, the manifests identified the hazardous waste numbers determined to be appropriate based on acceptable knowledge. Due to the recent events at WIPP, LANL has been re-evaluating the characterization of the waste stream. As we have discussed, it was determined, based on a review of Acceptable Knowledge information, that it would be prudent to conservatively add hazardous waste number (HWN) D001 for the 119 containers on the attached list. It is our understanding that WCS is required to amend the manifests associated with those containers. This letter provides LANL's concurrence with that decision.

We are continuing to re-evaluate the waste characterization information concerning these nitrate salt waste streams, and will keep you updated as to new relevant information. If you have questions please contact Michael Brandt (LANS) at (505) 667-4218, or Pete Maggiore (DOE) at (505) 665-5025.

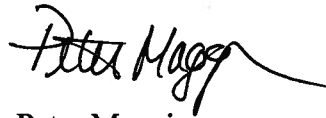
PO Box 1663, MS A100, Los Alamos, NM 87545  
505-667-5101 / FAX 505-665-2679

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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

Enclosures: (1) List of Manifests Requiring Correction

Cy: Kimberly Davis Lebak, NA-LA, (E-File)  
Lisa Cummings, NA-LA, (E-File)  
Gene E. Turner, NA-LA, (E-File)  
Kirsten M. Laskey, NA-LA, (E-File)  
Eric L. Trujillo, NA-LA, (E-File)  
Carl A. Beard, PADOPS, (E-File to [aosburn@lanl.gov](mailto:aosburn@lanl.gov))  
Michael T. Brandt, ADESH, (E-File)  
Raeanna R. Sharp-Geiger, 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)  
Debra Nevergold, LTP, (E-File)  
Mark P. Haagenstad, ENV-CP, (E-File)  
Luciana Vigil-Holterman, ENV-CP, (E-File)  
[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov), (E-File)  
[locatesteam@lanl.gov](mailto:locatesteam@lanl.gov), (E-File)  
[env-correspondence@lanl.gov](mailto:env-correspondence@lanl.gov) (E-File)



WCS Package ID (SWB)	INNERCONTAINER ID	Total MIN02	NWP ID (SWB)	Manifest #
14-108472	68509	3	LASB50018	010784286JJK
	69087			
	69188			
14-108474	68342	3	LASB50019	010784286JJK
	69103			
	68584			
14-108493	69077	2	LASB50032	010784288JJK
	69195			
14-108527	68643	4	SB10174	010784296JJK
	S870129			
	S841295			
	S824056			
14-108583	68350	1	LASB50067	010784305JJK
14-108424	68426	1	LASB02166	010784277JJK
14-108615	68428	1	LASB50028	010784317JJK
14-108495	68543	1	LASB50031	010784288JJK
14-108549	68546	1	LASB50083	010784299JJK
14-108585	68627	1	LASB50059	010784305JJK
14-108440	68656	1	LASB02206	010784279JJK
14-108500	68676	1	LASB50005	010784289JJK
14-108546	69064	1	LASB50089	010784299JJK
14-108532	69067	1	LASB50015	010784296JJK
14-108486	69085	1	LASB50021	010784287JJK
14-108578	69154	1	LASB50061	010784303JJK
14-108457	69209	1	LASB50010	010784285JJK
14-108524	69295	1	LASB50040	010784294JJK
14-108613	93953	1	LASB50060	010784317JJK
14-108631	63130	1	LASB50410	010784319JJK
14-108589	68311	1	LASB50086	010784306JJK
14-108548	68314	2	LASB50012	010784299JJK
	69068			
14-108442	68315	2	LASB02204	010784279JJK
	S832485			
14-108547	68325	3	LASB50045	010784299JJK
	69422			
	69105			
14-108470	68341	2	LASB50020	010784286JJK
	69187			
14-108484	68347	2	LASB50026	010784287JJK
	93935			
14-108558	68425	1	LASB50036	010784300JJK
14-108465	68429	2	LASB50017	010784284JJK
	68433			
14-108518	68431	2	LASB50048	010784292JJK
	69102			
14-108491	68432	3	LASB50037	010784288JJK
	69182			
	68583			
14-108606	68449	1	LASB50072	010784315JJK

14-108551	68508	1	LASB50094	010784298JJK
14-108505	68580	2	LASB50025	010784290JJK
	69179			
14-108559	68617	3	LASB50039	010784300JJK
	69177			
	69043			
14-108603	68619	1	LASB50079	010784314JJK
14-108498	68620	2	LASB50002	010784289JJK
	69191			
14-108463	68625	2	LASB50013	010784284JJK
	68632			
14-108550	68628	2	LASB50082	010784298JJK
	69210			
14-108515	68661	2	LASB50046	010784291JJK
	69196			
14-108587	68679	3	LASB50102	010784305JJK
	69233			
	69180			
14-108579	68686	3	LASB50062	010784303JJK
	69091			
	69073			
14-108556	69014	1	LASB50095	010784300JJK
14-108534	69033	2	LASB50063	010784297JJK
	69097			
14-108513	69034	1	LASB50027	010784291JJK
14-108574	69041	2	LASB50104	010784304JJK
	69226			
14-108554	69045	1	LASB50071	010784298JJK
14-108582	69060	3	LASB50100	010784303JJK
	69413			
	69080			
14-108522	69061	2	LASB50035	010784294JJK
	69161			
14-108599	69063	1	LASB50107	010784313JJK
14-108538	69066	2	LASB50033	010784297JJK
	69181			
14-108619	69074	2	LASB50087	010784318JJK
	69212			
14-108566	69081	1	LASB50052	010784302JJK
14-108571	69083	1	LASB50098	010784301JJK
14-108634	69094	2	LASB50424	010784322JJK
	69555			
14-108629	69099	2	LASB50432	010784319JJK
	S802985			
14-108570	69158	1	LASB50055	010784301JJK
14-108601	69159	1	LASB50074	010784313JJK
14-108529	69162	2	LASB50066	010784296JJK
	69237			
14-108577	69163	3	LASB50057	010784303JJK
	69216			
	69402			
14-108617	69185	2	LASB50043	010784318JJK

	69492			
14-108595	69189	1	LASB50108	010784312JJK
14-108590	69192	1	LASB50105	010784306JJK
14-108511	69193	1	LASB50041	010784291JJK
14-108597	69194	1	LASB50088	010784312JJK
14-108461	69217	1	LASB50014	010784284JJK
14-108572	69234	2	LASB50034	010784301JJK
	69430			
14-108628	69279	2	LASB50421	010784319JJK
	69428			
14-108608	69282	1	LASB50064	010784315JJK
14-108609	69313	2	LASB50103	010784315JJK
	69236			
14-108607	69493	1	LASB50081	010784315JJK
14-108630	69565	1	LASB50414	010784319JJK
14-108581	69691	2	LASB50058	010784303JJK
	69069			
14-108697	69285	1	LASB50416	010784321JJK