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**From:** Haagenstad, Mark P  
**Sent:** Wednesday, November 09, 2016 4:17 PM  
**To:** 'Kieling, John, NMENV'; Dhawan, Neelam, NMENV; 'Briley, Siona, NMENV'  
**Cc:** Bretzke, John Clifford; Grieggs, Tony; 'Armijo, Karen'; Pugh, Jody M; Maggiore, Peter; Gammon, Ellen; Brandt, Michael Thomas; Padilla, Patrick L  
**Subject:** Waste Characterization Discrepancy Notification

Dear Mr. Kieling:

Per the voice message I left for yourself and Neelam Dhawan today (November 9, 2016), this email is being provided to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of a waste characterization discrepancy as required by Permit Section (PS) 2.4.7(4). Due to the limited timing of the notification requirement, the Permittees are hereby providing the information via email in order to satisfy the 3-day notification requirement pursuant to PS 2.4.7(4).

The Permittees shipped hazardous waste container W830372 to Veolia ES Technical Solutions, LLC in Colorado on September 29, 2016. The shipment was received on October 5, 2016, and the manifest was returned to LANS with no discrepancies. The Permittees received notification on November 8, 2016 that the pH of the liquid in the container was verified by the receiving facility to be lower than what was described in the Waste Stream Profile (WSP).

The WSP describes the waste within container W830372 to be water with sodium hydroxide. EPA Hazardous Waste Number D002 was originally applied to this waste and it was shipped as a RCRA-Regulated Liquid. During normal operations at the Treatment Storage Disposal Facility (TSDF), pH checks were performed, and the pH was measured/determined to be 2.22.

The Permittees are in the process of evaluating the waste characterization discrepancy and developing a formal letter notification to the NMED-HWB. The Permittees are also in the process of evaluating and re-characterizing the waste pursuant to PS 2.4.7(4).

Please contact me at (505) 665-2014 if additional information would be helpful.

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