

From: owner-rcra-prr@maillist.lanl.gov on behalf of [Tymkowych, John M](#)
To: [Kieling, John, NMENV](#)
Cc: [Grieggs, Tony](#); [Haagenstad, Mark P](#); [Carmichael, Jeff Allen](#); [Vigil-Holterman, Luciana R](#); [Tymkowych, John M](#); [Bacigalupa, Gian A](#); [Armijo, Karen](#); rcra-prr@lanl.gov
Subject: Notice of Potential Waste Characterization Discrepancy
Date: Wednesday, June 07, 2017 3:29:59 PM

Dear Mr. Kieling:

This email is being provided to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of the notification from a receiving facility of a potential 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 waste container W831217 to Veolia ES Technical Solutions, LLC in Colorado on May 17, 2017. The shipment was received on May 18, 2017, and the manifest has not yet been returned to the Los Alamos National Security, LLC (LANS). The Permittees and the receiving facility are continuing to work to verify that the waste matches the shipping documentation. The Permittees received notification on June 5, 2017 that the pH of the liquid in one of three containers was measured by the receiving facility to be lower than what was described in the waste stream profile for the three containers.

The profile describes the waste within container W831217 to be "Cooling System Descaling Solution." It is described as "Solution generated from using a water/chemical mixture to soften and remove scale material from cooling system piping and equipment." The waste was shipped to Veolia as "NON-REGULATED, LIQUID, WATER". During normal operations at the Veolia facility, pH checks were performed, and the pH was measured to be 1.88.

The Permittees are in the process of evaluating the waste characterization discrepancy and developing a formal letter notification to the NMED-HWB. At this time, the generator is gathering additional process documentation for the evaluation.

Please contact me if additional information would be helpful.

John Tymkowych for

Mark Haagenstad
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