

COPY



U.S. DEPARTMENT OF
ENERGY



ESHID-603639

National Nuclear Security Administration

Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, New Mexico 87544
(505) 667-5105/Fax (505) 667-5948

Environmental Management

Los Alamos Field Office
P.O. Box 1663, M984
Los Alamos, New Mexico 87544
(505) 257-7950/Fax (505) 665-5903

Mr. Kevin Pierard, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Los Alamos National Laboratory Response to Supplemental Information Request Fiscal Year (FY) 2020 Status Update for Non-Conformance Report (NCR) Containers, EPA ID# NM0890010515

Dear Mr. Pierard:

The United States Department of Energy (DOE) and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Environmental Management Los Alamos Field Office (EM-LA), along with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) (collectively, the Permittees), provide this supplemental information as requested in the April 5, 2021, New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) letter "Supplemental Information Request Fiscal Year (FY) 2020 Status Update for Non-Conformance Report (NCR) Containers." This correspondence supplements the information previously provided to the NMED-HWB in the FY 2020 Status Update for Non-Conformance Report (NCR) Containers (NCR Report), dated December 22, 2020, for Los Alamos National Laboratory (LANL). We hope that this additional information satisfies the NMED-HWB request and contributes to shared goals for the annual NCR Report.

Two enclosures, one for each responsible party, are provided as attachments to this letter. The enclosures contain tables that summarize information regarding each container in NMED-HWB's request, provide NMED-HWB's comments for each container, and provide the Permittees' responses to NMED-HWB's comments.

Enclosure 1 includes Requested Supplemental Information of NA-LA/Triad.

Enclosure 2 includes Requested Supplemental Information of EM-LA/N3B.

If you have questions or comments concerning this submittal for Triad, please contact Karen E. Armijo (NA-LA) at (505) 665-7314 or Patrick L. Padilla (Triad) at (505) 412-0462.

If you have questions or comments concerning this submittal for N3B, please contact Arturo Duran (EM-LA) at (505) 257-7907 or Emily Day (N3B) at (505) 695-4243.

Sincerely,

Karen E. Armijo
Digitally signed by Karen E. Armijo
Date: 2021.06.03 10:25:14 -06'00'

Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

Sincerely,

M Lee Bishop
Digitally signed by M Lee Bishop
Date: 2021.06.03 11:58:12 -06'00'

M. Lee Bishop,
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office
U.S. Department of Energy

- Enclosure(s): 1) Requested Supplemental Information of NA-LA/Triad
2) Requested Supplemental Information of EM-LA/N3B

Copy w/enclosures:

Kevin Pierard, NMED-HWB, kevin.pierard@state.nm.us
Neelam Dhawan, NMED-HWB, Santa Fe, NM neelam.dhawan@state.nm.us
Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@state.nm.us
Mitchell Schatz, NMED-HWB, Santa Fe, NM, mitchell.schatz@state.nm.us
Peter D. Rodrik, NA-LA, Peter.Rodrik@nnsa.doe.gov
Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
Stephen Jochem, NA-LA, stephen.jochem@nnsa.doe.gov
Adrienne L. Nash, NA-LA, adrienne.nash@nnsa.doe.gov
Marcus Pinzel, NA-LA, marcus.pinzel@nnsa.doe.gov
Darlene Rodriguez, NA-LA, darlene.rodriguez@nnsa.doe.gov
P. Erika Wisdom, NA-LA, erika.wisdom@nnsa.doe.gov
Jason Saenz, NA-LA, jason.saenz@nnsa.doe.gov
M. Lee Bishop, EM-LA, lee.bishop@em.doe.gov
Elizabeth Churchill, EM-LA, elizabeth.churchill@em.doe.gov
Arturo Q. Duran, EM-LA, arturo.duran@em.doe.gov
Stephen Hoffman, EM-LA, stephen.hoffman@em.doe.gov
Jesse Kahler, EM-LA, jesse.kahler@em.doe.gov
Kirk D. Lachman, EM-LA, kirk.lachman@em.doe.gov
David Nickless, EM-LA, david.nickless@em.doe.gov
Cheryl Rodriguez, EM-LA, cheryl.rodriguez@em.doe.gov
Susan McMichael, Triad, GC-ESH, smcmichael@lanl.gov
Enrique Torres, Triad, EWP, etorres@lanl.gov
Jennifer E. Payne, Triad, EPC-DO, jpayne@lanl.gov
Andie McLaughlin-Kysar, Triad, EPC-DO, andiek@lanl.gov
Jackie C. Hurtle, Triad, EPC-WMP, jhurtle@lanl.gov
Cecilia M. Trujillo, Triad, EPC-WMP, ceciliat@lanl.gov
Patrick L. Padilla, Triad, EPC-WMP, plpadilla@lanl.gov
Catherine L. Juarez, Triad, EPC-WMP, cjuarez@lanl.gov
Oral S. Saulters, Triad, EPC-WMP, osaulters@lanl.gov
Kristen Van Horn, Triad, EPC-WMP, klv@lanl.gov
William Alexander, N3B, william.alexander@em-la.doe.gov
Emily Day, N3B, emily.day@em-la.doe.gov
Ellen Gammon, N3B, ellen.gammon@em-la.doe.gov
Jeff Holland, N3B, jeff.holland@em-la.doe.gov
Kim Lebak, N3B, kim.lebak@em-la.doe.gov

Joseph Legare, N3B, joseph.legare@em-la.doe.gov
Dana Lindsay, N3B, dana.lindsay@em-la.doe.gov
Pamela Maestas, N3B, pamela.maestas@em-la.doe.gov
Glenn Morgan, N3B, glenn.morgan@em-la.doe.gov
Joseph Murdock, N3B, joseph.murdock@em-la.doe.gov
Gerald O'Leary III, N3B, gerald.oleary@em-la.doe.gov
Anthony Stone, N3B, anthony.stone@em-la.doe.gov
rcra-prr@lanl.gov
eshqss-dcrm@lanl.gov
locatesteam@lanl.gov
epccorrespondence@lanl.gov
lasomailbox@nnsa.doe.gov
n3brecords@em-la.doe.gov
EMLA.docs@em.doe.gov

ENCLOSURE 1

Requested Supplemental Information of
NA-LA/Triad

EPC-DO-21-166

LA-UR-21-24492

Date: JUN 03 2021

Supplemental Information Request Fiscal Year (FY) 2020 Status Update for Non-Conformance Report (NCR) Containers
NA-LA/Triad

Container Numbers and Dates of Generation	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	NMED Comment (4/5/2021)	Permittees Response	Status
LA00000067822	NCR-LANL-0461-20	Oxidizing chemicals that are the sole component of waste (BoK 24 Addendum 2 Section 4.8)	N/A	TA-55	5/9/2013 D005-D011	"Oxidizing chemicals that are sole component of the waste". Please explain why D002 was not conservatively applied to this container or provide documentation supporting the fact that liquids are not present.	The chemical process used at this facility results in a dried nitric acid. At the point of generation, there is no liquid present and therefore the EPA Hazardous Waste Code D002 was not applied to the waste container. Subsequent AKE showed that the acid was a dry residual, not a liquid, and was characterized appropriately.	NCR Open, Technical justification for container to pass BoK will be submitted for CBFO review and approval.
LA00000068163	NCR-LANL-0452-19	Container includes a repackaged fiberglass re-enforced plywood box and plastic. An unknown amount of liquid waste potentially absorbed either an engineered organic polymer sorbent or an inorganic sorbent. Per the BoK process, it is assumed that Waste Lock 770 was used as the sorbent. It is not possible to do a defensible mass balance for this container and is conservatively returned back to host site.	57457 03/07/2014	TA-03-0029 (CMR)	3/25/2014 D004-D011, D018, D019, D021, D022, D035, D038- D040, F001, F002 and F005	"an unknown amount of liquid waste." Please explain why D002 was not conservatively applied to this container or provide documentation supporting absence of liquids in the container.	As part of the process, the liquid mentioned in the description documentation was absorbed with a WIPP-approved absorbent prior to waste generation. Therefore, at the point of waste generation, the waste did not contain liquids and did not meet the criteria for the EPA Hazardous Waste Code D002 designation.	NCR Open, Containers being evaluated in next BoK addendum for LA-MHD03.001
LA00000069506	NCR-LANL-0452-19	Lead-lined gloves, plastic vials, wood, plastic, cheese-cloth, and 3 oz. of containerized absorbed liquid, Basis of knowledge (BoK) process conservatively assumes that all liquid is nitric acid. In addition, the BoK process assumes that polyol organic kitty litter (10 kg) was utilized to absorb the 3 oz. of liquid.	53700 02/27/2014	TA-03-0029 (CMR)	11/01/2017 D004-D011, D018, D019, D021, D022, D035, D038- D040, F001, F002 and F005	"assumes that the liquid is nitric acid." However, D002 HWN was not applied. Provide an explanation.	While the description of the contents within the container includes liquids, at the point of waste generation there were no liquids present. As part of the process, the liquid mentioned in the documentation was absorbed with a WIPP-approved absorbent prior to waste generation. Therefore, at the point of waste generation, the waste did not contain liquids and did not meet the criteria for the EPA Hazardous Waste Code D002 designation.	NCR Open, Containers being evaluated in next BoK addendum for LA-MHD03.001

Supplemental Information Request Fiscal Year (FY) 2020 Status Update for Non-Conformance Report (NCR) Containers
NA-LA/Triad

Container Numbers and Dates of Generation	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	NMED Comment (4/5/2021)	Permittees Response	Status
LA00000073938	NCR-LANL-0466-200	The container does not meet the requirements outlined in Technical Evaluation 5 in Compatibility Evaluation Memorandum (CCE) 18 LA-MHD01 .001 revision 2.	N/A	TA-55	N/A – non-hazardous	“Compatibility Evaluation.” Provide additional details on this evaluation and findings.	The CCE 18-LA –MHD01.001 Rev.2 was enhanced to require formal documentation and generation of chemical compatibility at ambient temperature and pressure. The CCE for the MHD001.001 states that “contents of this waste stream will not lead to an adverse reaction consequence... The waste form and characteristics render components unavailable for adverse reaction.” This is a non-hazardous drum containing wipes used to radiologically decontaminate the exterior of a welded product. During review, there was no evidence of incompatible wastes as the wipes were never in contact with liquid acid or any other hazardous waste that would cause the container to carry hazardous waste codes.	NCR Closed, containers resolved
LA00000073935	NCR-LANL-0466-200	The container does not meet the requirements outlined in Technical Evaluation 5 in Compatibility Evaluation Memorandum (CCE) 18 LA-MHD01 .001 revision 2.	N/A	TA-55	N/A – non-hazardous	“Compatibility Evaluation.” Provide additional details on this evaluation and findings.	The CCE 18-LA –MHD01.001 Rev.2 was enhanced to require formal documentation and generation of chemical compatibility at ambient temperature and pressure. The CCE for the MHD001.001 states that “contents of this waste stream will not lead to an adverse reaction consequence... The waste form and characteristics render components unavailable for adverse reaction.” This is a non-hazardous drum containing wipes used to radiologically decontaminate the exterior of a	NCR Closed, containers resolved

Supplemental Information Request Fiscal Year (FY) 2020 Status Update for Non-Conformance Report (NCR) Containers
NA-LA/Triad

Container Numbers and Dates of Generation	NCR Document Identification	Reason Container Failed for BoK	Container Numbers and Dates of Generation	Location of Waste Generation	Hazardous Waste Numbers and Dates Numbers Assigned to Containers	NMED Comment (4/5/2021)	Permittees Response	Status
							welded product. During review, there was no evidence of incompatible wastes as the wipes were never in contact with liquid acid or any other hazardous waste that would cause the container to carry hazardous waste codes.	

ENCLOSURE 2

Requested Supplemental Information of
EM-LA/N3B

Date: JUN 03 2021

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
68704	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	11/3/1981	TA-50-1	Date Codes Assigned 02/12/2018. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68705	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	9/8/1981	TA-50-1	Date Codes Assigned 02/12/2018. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68709	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	5/15/1980	TA-50-1	Date Codes Assigned 11/7/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68766	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	11/7/1983	TA-50-1	Date Codes Assigned 11/7/17. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68769	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	8/3/1981	TA-50-1	Date Codes Assigned 11/7/17. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68770	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	10/4/1982	TA-50-1	Date Codes Assigned 1/23/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
68774	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	11/7/1983	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68778	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/8/1982	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68795	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/4/1980	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68868	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	7/27/1980	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68869	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	11/7/1983	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68915	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	12/2/1980	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
68916	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	12/2/1980	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68918	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	3/9/1982	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68919	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	3/1/1983	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68921	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	7/13/1983	TA-50-1	Date Codes Assigned 2/12/18 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68922	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	3/9/1982	TA-50-1	Date Codes Assigned 2/12/18 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68931	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/9/1981	TA-50-1	Date Codes Assigned 11/7/2017 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
86669	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	12/1/1980	TA-50-1	Date Codes Assigned 11/07/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
91479	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	10/4/1982	TA-50-1	Date Codes Assigned 11/07/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
S850538	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	5/13/1985	TA50-1	Date Codes Assigned 11/17/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	Open
68859	NCR-LANL0453200	This container was lacking sufficient information to determine their status with the BoK Criteria. At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used.	2/8/1982 S822080	TA-50-1	Date Codes Assigned 11/7/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided additional documentation to CCP AKEs. Currently waiting for Central Characterization Project (CCP) re-evaluation to the BOK requirements with the new information and is expected to pass. This will allow the NCR to be resolved and closed.	open
69044	NCR-LANL0452192	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids. Per the BOK process, it is assumed to be organic kitty litter due to time of generation.	09/30/1986 S863122	TA-3-29 (CMR) TA-50-0069 (WCCRF)	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
69506	NCR-LANL0452192	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids. Per the BOK process, it is assumed to be organic kitty litter due to time of generation. Per the BOK the host site is to provide additional information or treat.	02/15/2014 53700	TA-03-0029 (CMR)	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
68658	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	10/04/82	TA-55-PF4 TA-50-0069 (WCCRF)	Date Codes Assigned 11/14/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open
68677	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	1/5/1981	TA-55-PF4 TA-50-0069 (WCCRF)	Date Codes Assigned 8/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open
69026	NCR-LANL0452192	This container was rejected for the possible use of vermiculite to absorb free liquids. Per the BOK proces , it is assume the vermiculite is used to absorb oxidizing liquids. Per the BOK the host site is to provide additional information or treat.	12/28/1981	TA-03-0029 (CMR) TA-50-0069 (WCCRF)	Date Codes Assigned 12/03/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain oxidizing liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open
69029	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	7/8/1985	TA-55-PF4	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open
69042	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	5/13/1985	TA-55-PF4 TA-50-0069 (WCCRF))	Date Codes Assigned 12/14/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open
69057	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	5/4/1981	TA-55*	Date Codes Assigned 12/13/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
69059	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	12/29/1982	TA-55-PF4 TA-50-0069 (WCCRF)	Date Codes Assigned 12/13/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
69199	NCR-LANL0452192	This container was rejected for the possible use of vermiculite to absorb free liquids. Per the BOK proces , it is assume the vermiculite is used to absord oxidizing liquids. Per the BOK the host site is to provide additional information or treat.	07/25/1984 S845017	TA-03-0029 (CMR)	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain oxidizing liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
69524	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	2/9/1981	TA-55-PF4 TA-50-0069 (WCCRF)	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
85072	NCR-LANL0452192	This container was rejected for the possible use of vermiculite to absorb free liquids. Per the BOK proces , it is assume the vermiculite is used to absord oxidizing liquids. Per the BOK the host site is to provide additional information or treat.	12/1/1979 S792740, 02/12/2014 LASB02210	TA-03-0029 (CMR)	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain oxidizing liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
88968	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	11/9/1982	TA-55-PF4	Date Codes Assigned 11/01/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
S844686	NCR-LANL0452192	This container was rejected for the possible use of vermiculite to absorb free liquids. Per the BOK proces , it is assume the vermiculite is used to absord oxidizing liquids. Per the BOK the host site is to provide additional information or treat.	5/9/1984	TA-03-0029 (CMR)	Date Codes Assigned 12/04/2017. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain oxidizing liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Open
68830	NCR-LANL0457191	This container was rejected for the possible use of vermiculite to absorb free liquids. The BOK does not allow the use of vermiculite (inorganic sorbent) for treating oxidizing chemicals. Per the BOK the host site is to provide additional information or treat.	2/15/1982	TA-55-PF4	Date Codes Assigned 3/22/17 D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	This container has the potential to contain liquids sorbed with vermiculite, which is not an allowed sorbent at WIPP. Remediation efforts are being planned for this container. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	open

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
68163	NCR-LANL0452192	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids. <i>Per the BoK process, is assumed that Waste Lock 770 was used as the sorbent. It is not possible to do a defensible mass balance for this container and is conservatively returned back to host site.</i>	06/26/2013 745634	TA-03-0029 (CMR)	Date Codes Assigned 09/15/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	The unknown liquid was potentially absorbed with polyol organic sorbents. Remediation efforts are being planned for this container. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Open
64778	NCR-LANL0467200	BoK20 for LA-MHD03.001 rejects containers 64778 and 64786. <i>At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used. Per the BOK the host site is to provide additional information or treat.</i>	06/26/2013	TA-03-0029 (CMR)	Date Codes Assigned 09/15/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. <i>Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MHD03.001 and passed.</i>	Closed
64786	NCR-LANL0467200	BoK20 for LA-MHD03.001 rejects containers 64778 and 64786. <i>At initial BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to whether or not oxidizers were present and the type of absorbents used. Per the BOK the host site is to provide additional information or treat.</i>	11/7/2012	TA-03-0029 (CMR)	Date Codes Assigned 05/07/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. <i>Site AKE provided detailed container information to CCP and the container was re-reviewed under a BOK evaluation for LA-MHD03.001 and passed.</i>	Closed
68154	NCR-LANL0468200	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids resulting in a wt% above the allowable limit. <i>At original BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to the possible oxidizing chemical absorbed. Per the BOK the host site is to provide additional information or treat.</i>	05/25/1995 56066	TA-55-PF4	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. NCR currently closed. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Closed
68155	NCR-LANL0468200	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids resulting in a wt% above the allowable limit. <i>At original BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to the possible oxidizing chemical absorbed. Per the BOK the host site is to provide additional information or treat.</i>	05/25/1995 62450	TA-55-PF4	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	Provided Additional documentation to CCP for closure of NCR. NCR currently closed. <i>LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.</i>	Closed

Annual NCR Report for Containers That Did Not Meet BoK
FY2020

Container Put on Administrative Hold by CCP Through NCR	NCR Document Identification	Reason Container Failed for BoK (Description)	Container Numbers and Dates of Generation	Location of Waste Generation (Technical Area)	Hazardous Waste Numbers and Dates Assigned to Containers	Path Forward for Remediation of Container (Example of proposed language to be provided)	Resolved or Current Status
68161	NCR-LANL0468200	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids resulting in a wt% above the allowable limit. At original BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to the possible oxidizing chemical absorbed. Per the BOK the host site is to provide additional information or treat.	06/25/1993 55193	TA-55-PF4	Date Codes Assigned 08/23/2013. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	A re-evaluation under the BOK process was requested and the container passed BOK on 10/03/2019, currently waiting for CCP to close NCR. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Closed
68264	NCR-LANL0468200	This container was rejected for the potential for Polyol organic sorbents used for absorbing free liquids resulting in a wt% above the allowable limit. At original BOK evaluation the CCP did not have sufficient source documents to complete the evaluation for the containers with respect to the possible oxidizing chemical absorbed. Per the BOK the host site is to provide additional information or treat.	10/03/1988 55121	TA-55-PF4	Date Codes Assigned 01/28/2014. D004-D011, D018, D019, D021, D022, D035, D038-D040, F001, F002 and F005	A re-evaluation under the BOK process was requested and the container passed BOK on 10/03/2019, currently waiting for CCP to close NCR. LANL's TRU policy is carefully managed to prohibit liquids, and the word "dried" supports this. Dry material cannot meet the RCRA definition of D002.	Closed