



**Environmental Protection and Compliance Division**

Los Alamos National Laboratory  
P.O. Box 1663, MS M969  
Los Alamos, NM 87545  
505-667-8160

**National Nuclear Security Administration**

Los Alamos Field Office  
3747 West Jemez Road, A316  
Los Alamos, NM 87544  
505-667-5794/Fax 505-606-5948

**Symbol:** EPC-DO-24-036

**Date:** January 26, 2024

**LA-UR:** 24-20698

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

**Subject: Notification of Resolved Off-site Shipment Discrepancy**

Dear Mr. Maestas:

The United States Department of Energy (DOE) National Nuclear Security Administration Los Alamos Field Office (NA-LA), in association with Triad National Security, LLC (Triad) (the Permittees) have drafted this letter to provide the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) notification of a three-day notice per Permit Section 2.4.7(4). This section requires the Permittees notify the NMED-HWB in writing within three days of receipt of a notice reporting waste not matching the pre-approved waste analysis certification or accompanying waste manifest from the receiving facility.

On December 19, 2023, a monthly hazardous waste shipment of 90 containers was made from Technical Area 60, Building 17 to the Veolia 10-day waste transfer station in Albuquerque, New Mexico. The shipment included one container that was mis-identified/mis-labeled and incorrectly included in the shipment. The mis-labeled container was likely confused with other containers of similar size and shape. The Permittees are investigating the error and developing a detailed timeline of events. Notification to Veolia occurred at the time of discovery, and when the error was confirmed on January 23, 2024, the Permittees initiated this notification.

The corrected manifest of the accepted shipment is provided in Enclosure 1. The Permittees will continue to confer with Veolia on measures needed correct any error made.

If you have any questions or comments concerning this communication, please contact Robert A. Gallegos (NA-LA) at 208-569-0377 or by email at [robert.gallegos@nnsa.doe.gov](mailto:robert.gallegos@nnsa.doe.gov) or Jason Hill (Triad) at 505-551-2218 or by email at [jshill@lanl.gov](mailto:jshill@lanl.gov).

Sincerely,

STEVEN STORY  
(Affiliate)

Digitally signed by STEVEN  
STORY (Affiliate)  
Date: 2024.01.25 13:43:07  
-07'00'

Steven L. Story  
Division Leader  
Environmental Protection and Compliance Division  
Triad National Security, LLC  
Los Alamos National Laboratory

Sincerely,

Robert A.  
Gallegos

Digitally signed by Robert A. Gallegos  
Date: 2024.01.26 07:57:36 -07'00'

Robert A. Gallegos  
Program Manager  
Environmental Permitting and Compliance Program  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

SLS/RAG

Enclosure: Corrected Manifest Container W887744

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### Subject: Notification of Resolved Off-site Shipment Discrepancy

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# ENCLOSURE 1

Corrected Manifest Container W887744

EPC-DO: 24-036

Date: January 26, 2024

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number <b>NM0890010515</b>	22. Page <b>7 of 10</b>	23. Manifest Tracking Number <b>013905710ELE</b>				
24. Generator's Name <b>TRIAD on behalf of US Department of Energy Technical Area 60, Los Alamos, NM 87545 TRIAD on behalf of US Department of Energy</b>								
25. Transporter _____ Company Name				U.S. EPA ID Number				
26. Transporter _____ Company Name				U.S. EPA ID Number				
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
		No.	Type					
x 5	UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3 (6.1), II, (LABPACK)	1	DF	23	K	D001	F002	F003
x 6	UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3 (6.1), II, (LABPACK)	1	DF	42	K	D001	D018	D022 D028 D035 D038
x 7	UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3 (6.1), II, (LABPACK)	1	DF	27	K	D001	D018	D022 D038 F002 F003
x 8	UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3 (6.1), II, (LABPACK)	1	DF	8	K	D001	D003	D004 D005 D006 D007
x 9	UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., 3 (6.1), II, (LABPACK)	1	DF	5	K	D001	D022	F002 F003
x 10	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, II, (ETHANOL, ISOPROPANOL)	1	DF	42	K	D001		
<del>x 11</del>	<del>UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, II, (LABPACK)</del> <i>1/23/24 N.O.S., 9, III, (D008, D011)</i> <i>3077, Hazardous Waste, Solid,</i>	<del>1</del>	<del>DF</del>	<del>14</del>	<del>K</del>	<del>D008</del>	<del>D011</del>	<del>D021</del> <del>D001</del> <del>D012</del> <del>D013</del> F002
x 12	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, II, (LABPACK)	1	DF	30	K	D001	F002	F003
x 13	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, II, (LABPACK)	1	DF	15	K	D001	D010	F003
x 14	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, II, (LABPACK)	1	DF	7	K	D001	F003	
32. Special Handling Instructions and Additional Information								
<p>2.5 35718, W887327, 131 - <i>433469</i></p> <p>2.6 49999, W887399, 131 - <i>W887744</i></p> <p>2.7 51291, W887520, 131 - <i>547271</i></p> <p>2.8 51323, W887585, 131 - <i>547271</i></p> <p>2.9 53653, W887391, 131 - <i>433469</i></p> <p>2.10 50019, W887421, 128 - <i>547416</i></p> <p>2.11 51945, W890044, 128 - <i>433469</i></p> <p>2.12 49590, W887398, 128 - <i>1/23/24</i></p> <p>2.13 51416, W887708, 128 - <i>↓</i></p> <p>2.14 51431, W887392, 128 - <i>↓</i></p>								
33. Transporter _____ Printed/Typed Name		Signature			Month Day Year			
34. Transporter _____ Printed/Typed Name		Signature			Month Day Year			
35. Discrepancy								
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								

GENERATOR

TRANSPORTER

DESIGNATED FACILITY



# LAND DISPOSAL RESTRICTIONS NOTIFICATION FORM

F005 Spent non-halogenated solvents: Pyridine

F005 Spent non-halogenated solvents: Toluene

**UHCs (if applicable):** Acetone, Barium, p-Cresol, m-Cresol, o-Cresol, Nickel, Methanol, Chloroform, Carbon tetrachloride, Methylene chloride, Lead, Trichloroethylene, Tetrachloroethylene, 1,1-Dichloroethylene, Ethyl ether, 1,2-Dichloroethane, Chromium, Carbon disulfide, Cadmium, Nitrobenzene, Toluene, Xylene, o-Dichlorobenzene, Antimony, Acetonitrile, Ethyl acetate, Methyl ethyl ketone, n-Butyl alcohol, Silver, Selenium, Chlorobenzene, Benzene, Arsenic, Pyridine, Zinc

P2 L9  
[W887391]

**Treatability Group:**  NWW  WW  Lab Pack (Appendix IV)  Lab Pack (268.42[c])

**EPA Code Waste Desc / Subcategory or Constituent**

D001 Ignitable: High TOC Ignitable Characteristic Liquids- >= 10% total organic carbon.

D022 Chloroform

F002 Spent halogenated solvents: Methylene chloride

F003 Spent non-halogenated solvents: Acetone

F003 Spent non-halogenated solvents: Methanol

**UHCs (if applicable):** Acetone, Methanol, Chloroform, Methylene chloride

P2 L10  
[W887421]

**Treatability Group:**  NWW  WW  Lab Pack (Appendix IV)  Lab Pack (268.42[c])

**EPA Code Waste Desc / Subcategory or Constituent**

D001 Ignitable: High TOC Ignitable Characteristic Liquids- >= 10% total organic carbon.

**UHCs (if applicable):**

P2 L11 <sup>1/23/24</sup>  
[W890044]  
W887744

**Treatability Group:**  NWW  WW  Lab Pack (Appendix IV)  Lab Pack (268.42[c]) <sup>1/23/24</sup>

**EPA Code Waste Desc / Subcategory or Constituent**

~~D001 Ignitable: Ignitable Characteristic Liquids, except for the § 261.21 (a)(1) High TOC~~ <sup>1/23/24</sup>

~~U162 Methyl methacrylate~~

~~U213 Tetrahydrofuran~~

**UHCs (if applicable):** <sup>D008 Lead</sup>  
<sup>D011 Silver</sup>  
<sup>D021 Chlorobenzene</sup>  
<sup>F002 Spent Halogenated Solvents: Chlorobenzene</sup>  
Chlorobenzene, Lead, Silver

P2 L12  
[W887398]

**Treatability Group:**  NWW  WW  Lab Pack (Appendix IV)  Lab Pack (268.42[c])

**EPA Code Waste Desc / Subcategory or Constituent**

D001 Ignitable: High TOC Ignitable Characteristic Liquids- >= 10% total organic carbon.

F002 Spent halogenated solvents: Methylene chloride

F003 Spent non-halogenated solvents: Acetone

F003 Spent non-halogenated solvents: Ethyl acetate

F003 Spent non-halogenated solvents: Methanol

**UHCs (if applicable):** Acetone, Methanol, Methylene chloride, Ethyl acetate