



ESHID-601114

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Date: JAN 13 2016
Symbol: ADESH-15-186
LA-UR: 15-29410
Locates Action No.: Not Applicable

Mr. 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: Waste Manifests that Require Correction- Waste Control Specialists Facility

The purpose of this letter is to provide a list of containers and associated manifest numbers that were shipped from the Los Alamos National Laboratory (LANL) to the Waste Control Specialists (WCS) facility in Andrews, Texas that require correction. The referenced containers were accepted by WCS for storage in April 2014, and the manifests were returned to LANL without any discrepancies identified. This list of containers and associated manifests that require correction is included as Enclosure 1.

The Department of Energy, National Nuclear Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS), (the LANL Permittees), determined that re-characterization was necessary for a subset of the TA-55 cemented waste stream (LA-CIN01) that includes small quantities of dewatered liquids with the potential for containing nitrate compounds. Dewatered liquids within the containers are believed to have originated from dewatering of the cemented waste over time. Re-characterization was conducted to determine the applicability of the Environmental Protection Agency (EPA) hazardous waste characteristics for ignitability and corrosivity (EPA Hazardous Waste Numbers D001 and D002) in the free liquids present in the containers. Waste containers were sampled and analyzed to confirm the chemical composition of the contents and analytical results were used to determine that EPA Hazardous Waste Numbers D001 and D002 were applicable for the subset of the LA-CIN01 waste stream that contain liquids.

While most LA-CIN01 containers confirmed with or suspected to contain free liquids are still located at LANL, 6 LA-CIN01 containers confirmed with or suspected to contain free liquids were shipped to the WCS facility. This letter and the table in Enclosure 1 provide the WCS, LLC notification of manifest

discrepancies based on the LANL conservative re-characterization and the addition of EPA Hazardous Waste Numbers D001 and D002 to the waste. The LANL Permittees, request that the manifests on the table in Enclosure 1 be corrected.

At the time LANL shipped the containers to the WCS facility, the manifests identified the hazardous waste numbers and hazard class determined to be appropriate at that time based on acceptable knowledge. The LANL Permittees and DOE/Environmental Management Programs notified the New Mexico Environment Department (NMED) of this re-characterization effort verbally on July 31, 2015, and formally by letter on August 31, 2015 (ESHID-600898). The confirmation of the application of these EPA Hazardous Waste Numbers was submitted to the NMED formally by letter on November 10, 2015 (ESHID-601002).

If you have questions please contact Mark P. Haagenstad at (505) 665-2014 or David Nickless at (505) 665-6448.

Sincerely,



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety & Health

Sincerely,



Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

MTB:KBLMPH:LRVH/lm

Enclosures: (1) List of applicable manifest numbers, dates of shipment and container numbers from Waste Stream LA-CIN01

Cy: Ryan Flynn, NMED, Santa Fe, NM, (E-File)
Kathryn Roberts, NMED, Santa Fe, NM, (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)
Douglas E. Hintze, EM-LA, (E-File)
Kimberly Davis Lebak, LASO-OOM, (E-File)
David J. Nickless, EM-WM, (E-File)
Lisa K. Cummings, LASO-OC, (E-File)
Gene E. Turner, LASO-NS-LP, (E-File)
Jordan Arnsward, LASO-NS-PI, (E-File)
Kirsten M. Laskey, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
Amy E. De Palma, PADOPS, (E-File)
Randall M. Erickson, ADEP, (E-File)
Cheryl D. Cabbil, ADNHHO, (E-File)
Michael T. Brandt, ADESH, (E-File)

Cy (continued):

Racanna Sharp-Geiger, ADESH, (E-File)
Enrique Torres, ADEP, (E-File)
David J. Funk, ADEP, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Kenneth M. Hargis, WD-WPE, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Deborah L. Guffee, SI-DC, (E-File)
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locatesteam@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)

ENCLOSURE 1

List of applicable manifest numbers, dates of shipment and
container numbers from Waste Stream LA - CIN01

ADESH-15-186

LA-UR-15-29410

Date: JAN 13 2016

List of applicable manifest numbers, dates of shipment and container numbers from Waste Stream LA-CIN01

PKG_ID	Grouping Category	Status	Location Site	Ship Date	Manifest Number
69213	EOC Swheat	Liquids Absorbed with Swheat	WCS	4/9/2014	010784288JJK
69229	EOC Swheat	Liquids Absorbed with Swheat	WCS	4/15/2014	010784296JJK
93031	EOC Swheat	Liquids Absorbed with Swheat	WCS	4/30/2014	010784323JJK
93525	EOC Swheat	Liquids Absorbed with Swheat	WCS	4/15/2014	010784298JJK
S855638	Certified RTR Pass	Liquids Identified	WCS	4/30/2014	010784321JJK
S860020	Certified RTR Pass	Liquids Identified	WCS	4/24/2014	010784314JJK