Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: AUG 2 1 2014
Symbol: ENV-DO-14-0219
LAUR: 14-26308
Locates Action No.: N/A

Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Dear Mr. Kieling:

Subject: Notification of Waste Characterization Discrepancy Regarding Application of EPA Hazardous Waste Number D001 to Nitrate-Salt-Bearing Waste Containers Shipped Off-Site From Los Alamos National Laboratory

The purpose of this letter is to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of a waste characterization discrepancy as required by the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). Section 2.4.7, *Waste Characterization Review*, of the Permit states that the Permittees shall "…(4) Recharacterize a hazardous waste stream whenever the Permittees are notified by a receiving off-site facility that the characterization of a hazardous waste they obtained from the Permittees' Facility does not match a pre-approved waste analysis certification or accompanying waste manifest or shipping paper. The Permittees shall notify the Department in writing within three days of their receipt of the notice of the discrepancy from a receiving facility." This letter is provided in follow-up to an August 13, 2014, electronic mail from Mark Haagenstad, Los Alamos National Security, LLC (LANS), to John Kieling, NMED-HWB, on the same subject.

The Department of Energy (DOE) and LANS (the Permittees) shipped nitrate-salt-bearing waste containers to the Waste Isolation Pilot Plant (WIPP) between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests. Additional shipments of this waste stream were made to Waste Control Specialists (WCS) in Andrews, Texas, and the Idaho National Laboratory. A list of the LANL manifest numbers for the referenced WIPP shipments is provided in Enclosure 1.

Since that time, the LANL and WIPP Permittees have each made the decision to add the Environmental Protection Agency (EPA) Hazardous Waste Number D001 for ignitability to the LANL nitrate-salt-bearing waste containers at their respective facilities. As a result, the characterization of the containers WIPP received from LANL no longer matches the pre-approved waste analysis certifications that accompanied the waste manifests and shipping papers associated with the original off-site shipments.

Based on the DOE/LANS' written concurrence that WIPP may correct the 49 original manifests (Enclosure 1), the Permittees are hereby notifying the Department of the newly-identified discrepancy, in accordance with Permit Section 2.4.7(4). This letter constitutes notification with respect to the wastes associated with the 49 referenced manifests.

If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or Mark P. Haagenstad (LANS) at (505) 665-2014.

Sincerely,

Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security LLC

Sincerely,

Gene E. Turner
Environmental Permitting Manager
Environmental Projects Office
Los Alamos Field Office
U.S. Department of Energy

AMD:GET:TAD/lm

Enclosure: August 13, 2014 LANL Concurrence Letter to WIPP

Cy: Ryan Flynn, NMED, Santa Fe, NM, (E-File)
Tom Blaine, NMED, Santa Fe, NM, (E-File)
Steve Pullen, NMED/HWB, Santa Fe, NM, (E-File)
Timothy Hall, NMED/HWB, Santa Fe, NM, (E-File)
Trais Kliphuis, NMED, Santa Fe, NM, (E-File)
Peter Maggiore, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Eric L. Trujillo, NA-LA, (E-File)
Kirsten Laskey, NA-LA, (E-File)
Carl A. Beard, PADOPS, (E-File to aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Jeffery D. Mousseau, ADEP, (E-File)
Daniel R. Cox, ADEP, (E-File)
Victoria A. George, REG-DO, (E-File)

Cy (Continued):
Kenneth M. Hargis, LTP-PTS, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
Paul Schumann, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
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Date: AUG 2 1 2014
Symbol: ENV-DO-14-0219
LAUR: 14-26308
Locates Action No.: N/A

RECEIVED
AUG 21 2014
NMED
Hazardous Waste Bureau

Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Dear Mr. Kieling:

Subject: Notification of Waste Characterization Discrepancy Regarding Application of EPA Hazardous Waste Number D001 to Nitrate-Salt-Bearing Waste Containers Shipped Off-Site From Los Alamos National Laboratory

The purpose of this letter is to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of a waste characterization discrepancy as required by the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). Section 2.4.7, *Waste Characterization Review*, of the Permit states that the Permittees shall "...(4) Recharacterize a hazardous waste stream whenever the Permittees are notified by a receiving off-site facility that the characterization of a hazardous waste they obtained from the Permittees' Facility does not match a pre-approved waste analysis certification or accompanying waste manifest or shipping paper. The Permittees shall notify the Department in writing within three days of their receipt of the notice of the discrepancy from a receiving facility." This letter is provided in follow-up to an August 13, 2014, electronic mail from Mark Haagenstad, Los Alamos National Security, LLC (LANS), to John Kieling, NMED-HWB, on the same subject.

The Department of Energy (DOE) and LANS (the Permittees) shipped nitrate-salt-bearing waste containers to the Waste Isolation Pilot Plant (WIPP) between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests. Additional shipments of this waste stream were made to Waste Control Specialists (WCS) in Andrews, Texas, and the Idaho National Laboratory. A list of the LANL manifest numbers for the referenced WIPP shipments is provided in Enclosure 1.

ENCLOSURE 1

August 13, 2014, LANL Concurrence Letter to WIPP

ENV-DO-14-0219

LAUR-14-26308

Date: AUG 2 1 2014

Los Alamos
NATIONAL LABORATORY
EST. 1943

Associate Director for ESH
Environment, Safety, and Health
P.O. Box 1663, MS K491
Los Alamos, New Mexico 87545
505-667-4218/Fax 505-665-3811

National Nuclear Security Administration
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(505) 667-5794/Fax (505) 667-5948

Date: AUG 1 3 2014
Ref: ADESH-14-041

J. R. Stroble, Acting Assistant Manager
Office of Program Management
Carlsbad Field Office
U. S. Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Stroble,

Subject: Written Concurrence for Correction of Waste Manifests

The purpose of this letter is to follow up our recent conversation regarding a discrepancy on manifests for containers (see attachment) that were shipped from the Los Alamos National Laboratory (LANL) to the Waste Isolation Pilot Plant (WIPP). The containers were received at the WIPP facility between August 8, 2013, and January 29, 2014, in shipments associated with 49 separate manifests (see attachment). WIPP accepted the shipments for disposal, and the manifests were returned to LANL without any discrepancies identified. Due to recent events at WIPP, and re-evaluation of Acceptable Knowledge information, the Carlsbad Field Office (CBFO) notified LANL that there was a manifest discrepancy based on WIPP's determination that nitrate salt-bearing waste containers required application of the EPA Hazardous Waste Number D001 and DOT subsidiary Hazard Division 5.1. Further, CBFO requested concurrence from LANL that the manifests can be corrected pursuant to Section C-5b(1) of the WIPP Waste Analysis Plan (the WAP) which provides that errors on a manifest can be corrected by WIPP with a verbal (followed by a mandatory written) concurrence by the generator/storage site technical contact. This letter provides that written concurrence.

At the time LANL shipped the containers to WIPP, the manifests identified the hazardous waste numbers and hazard class determined to be appropriate at that time based on acceptable knowledge. Due to the recent events at WIPP, LANL has been re-evaluating the characterization of the waste stream. On July 30, 2014, the Department of Energy, National Nuclear Administration (DOE/NNSA) and Los Alamos National Security, LLC (LANS) notified the New Mexico Environment Department that LANL had decided to provisionally apply EPA Hazardous Waste

Number D001 for the characteristic of ignitability to certain nitrate salt-bearing waste containers stored at LANL.

We are continuing to re-evaluate the waste characterization information concerning these nitrate salt waste streams, and will keep you updated as to new relevant information. If you have questions please contact Michael Brandt (LANS) at (505) 667-4218, or Pete Maggiore (DOE) at (505) 665-5025.

Sincerely,

Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC

Peter Maggiore
Assistant Manager
Environmental Projects Office
Los Alamos Field Office

Enclosures: (1) List of Manifests Requiring Correction

Cy: Kimberly Davis Lebak, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Gene E. Turner, NA-LA, (E-File)
Kirsten M. Laskey, NA-LA, (E-File)
Eric L. Trujillo, NA-LA, (E-File)
Carl A. Beard, PADOPS, (E-File to aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Raeanna R. Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Jeffery D. Mousseau, ADEP, (E-File)
Daniel R. Cox, ADEP, (E-File)
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Anthony R. Grieggs, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
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Luciana Vigil-Holterman, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)

ENCLOSURE 1

List of Manifests Requiring Correction

ADESH-14-041

Date: AUG 1 3 2014

List of applicable manifest numbers, shipment numbers, dates of receipt and container numbers from Waste Stream LA-MIN02-V.001				
Manifest Number	**Shipment Number**	**Received**	**Container Number**	**Container Count**
001600826GBF	IN130186	8-Sep-13	LA00000062547	1
001600826GBF	IN130186	8-Sep-13	LA00000063116	2
001600826GBF	IN130186	8-Sep-13	LA00000063198	3
001600826GBF	IN130186	8-Sep-13	LA00000063497	4
001600826GBF	IN130186	8-Sep-13	LA00000064665	5
001600826GBF	IN130186	8-Sep-13	LA00000064863	6
001600826GBF	IN130186	8-Sep-13	LAS822714	7
010784176JJK	LA130125	29-Aug-13	LA00000092217	8
010784176JJK	LA130125	29-Aug-13	LA00000092237	9
010784176JJK	LA130125	29-Aug-13	LA00000092347	10
010784176JJK	LA130125	29-Aug-13	LA00000092555	11
010784176JJK	LA130125	29-Aug-13	LA00000093588	12
010784176JJK	LA130125	29-Aug-13	LA00000093589	13
010784179JJK	LA130128	3-Sep-13	LA00000092220	14
010784180JJK	LA130129	4-Sep-13	LA00000092140	15
010784180JJK	LA130129	4-Sep-13	LA00000092219	16
010784180JJK	LA130129	4-Sep-13	LA00000092235	17
010784180JJK	LA130129	4-Sep-13	LA00000092495	18
010784180JJK	LA130129	4-Sep-13	LA00000093597	19
010784181JJK	LA130130	6-Sep-13	LA00000092246	20
010784181JJK	LA130130	6-Sep-13	LA00000092249	21
010784181JJK	LA130130	6-Sep-13	LA00000092252	22
010784181JJK	LA130130	6-Sep-13	LA00000093593	23
010784181JJK	LA130130	6-Sep-13	LA00000093598	24
010784182JJK	LA130131	6-Sep-13	LA00000092211	25
010784182JJK	LA130131	6-Sep-13	LA00000092239	26
010784182JJK	LA130131	6-Sep-13	LA00000092251	27
010784183JJK	LA130132	9-Sep-13	LA00000063182	28
010784183JJK	LA130132	9-Sep-13	LA00000064627	29
010784183JJK	LA130132	9-Sep-13	LA00000066376	30
010784183JJK	LA130132	9-Sep-13	LA00000092134	31
010784183JJK	LA130132	9-Sep-13	LA00000092145	32
010784183JJK	LA130132	9-Sep-13	LA00000092496	33
010784184JJK	LA130133	11-Sep-13	LA00000062912	34
010784184JJK	LA130133	11-Sep-13	LA00000063365	35

010784184JJK	LA130133	11-Sep-13	LA00000092136	36
010784184JJK	LA130133	11-Sep-13	LA00000092152	37
010784185JJK	LA130134	11-Sep-13	LA00000092171	38
010784185JJK	LA130134	11-Sep-13	LA00000092213	39
010784185JJK	LA130134	11-Sep-13	LA00000092215	40
010784185JJK	LA130134	11-Sep-13	LA00000092216	41
010784189JJK	LA130135	13-Sep-13	LA00000092122	42
010784189JJK	LA130135	13-Sep-13	LA00000092173	43
010784189JJK	LA130135	13-Sep-13	LA00000092470	44
010784189JJK	LA130135	13-Sep-13	LA00000092477	45
010784189JJK	LA130135	13-Sep-13	LA00000092482	46
010784189JJK	LA130135	13-Sep-13	LA00000092540	47
010784189JJK	LA130135	13-Sep-13	LA00000092565	48
010784189JJK	LA130135	13-Sep-13	LA00000092570	49
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010784189JJK	LA130135	13-Sep-13	LA00000092902	51
010784189JJK	LA130135	13-Sep-13	LA00000092937	52
010784189JJK	LA130135	13-Sep-13	LA00000092938	53
010784189JJK	LA130135	13-Sep-13	LA00000092940	54
010784188JJK	LA130136	14-Sep-13	LA00000063401	55
010784188JJK	LA130136	14-Sep-13	LA00000092156	56
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010784188JJK	LA130136	14-Sep-13	LA00000092572	58
010784188JJK	LA130136	14-Sep-13	LA00000092684	59
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010784190JJK	LA130137	17-Sep-13	LA00000092580	63
010784190JJK	LA130137	17-Sep-13	LA00000092674	64
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010784190JJK	LA130137	17-Sep-13	LA00000092892	67
010784190JJK	LA130137	17-Sep-13	LA00000092898	68
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010784203JJK	LA130149	1-Oct-13	LA00000092896	82
010784203JJK	LA130149	1-Oct-13	LA00000093487	83
010784203JJK	LA130149	1-Oct-13	LA00000093516	84
010784203JJK	LA130149	1-Oct-13	LA00000093577	85
010784204JJK	LA130150	2-Oct-13	LA00000093572	86
010784204JJK	LA130150	2-Oct-13	LA00000093573	87
010784204JJK	LA130150	2-Oct-13	LA00000093581	88
010784204JJK	LA130150	2-Oct-13	LA00000093601	89
010784204JJK	LA130150	2-Oct-13	LA00000093603	90
010784205JJK	LA130151	3-Oct-13	LA00000092680	91
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010784205JJK	LA130151	3-Oct-13	LA00000093609	96
010784205JJK	LA130151	3-Oct-13	LA00000093610	97
010784207JJK	LA130153	7-Oct-13	LA00000092212	98
010784207JJK	LA130153	7-Oct-13	LA00000093568	99
010784208JJK	LA130155	9-Oct-13	LA00000092127	100
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010784229JJK	LA130171	14-Nov-13	LA00000068383	163
010784229JJK	LA130171	14-Nov-13	LA00000068410	164
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010784230JJK	LA130172	15-Nov-13	LA00000068335	168
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010784230JJK	LA130172	15-Nov-13	LA00000068411	172
010784230JJK	LA130172	15-Nov-13	LA00000068417	173
010784230JJK	LA130172	15-Nov-13	LA00000082952	174
010784230JJK	LA130172	15-Nov-13	LA00000092221	175
010784231JJK	LA130173	19-Nov-13	LA00000068317	176
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010784231JJK	LA130173	19-Nov-13	LA00000068374	178
010784231JJK	LA130173	19-Nov-13	LA00000068407	179
010784231JJK	LA130173	19-Nov-13	LA00000068413	180
010784231JJK	LA130173	19-Nov-13	LA00000068451	181
010784231JJK	LA130173	19-Nov-13	LA00000092231	182
010784231JJK	LA130173	19-Nov-13	LA00000094149	183
010784231JJK	LA130173	19-Nov-13	LA00000094151	184
010784233JJK	LA130174	20-Nov-13	LA00000068337	185
010784233JJK	LA130174	20-Nov-13	LA00000068373	186
010784233JJK	LA130174	20-Nov-13	LA00000068453	187
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010784233JJK	LA130174	20-Nov-13	LA00000068462	189
010784233JJK	LA130174	20-Nov-13	LA00000068466	190
010784233JJK	LA130174	20-Nov-13	LA00000068479	191
010784233JJK	LA130174	20-Nov-13	LA00000068484	192
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