



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 22 2014**
Symbol: ENV-DO-0196
LAUR: 14-26225
Locates Action No.: NA

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 Resolved Off-site Shipment Discrepancy

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(4) states the Permittees shall notify the NMED-HWB in writing within three days of receipt of a notice of a waste not matching the pre-approved waste analysis certification or accompanying waste manifest from the receiving facility.

The Permittees shipped waste container (W743790) to Veolia ES Technical Solutions, LLC in Colorado on May 28, 2014 and the shipment was received on June 12, 2014. The manifest was returned to the Permittees thereafter without any discrepancies. On July 16, 2014 Veolia ES Technical Solutions, LLC contacted the Permittees to notify that container W743790 was received at their facility with a pH of 1.32. This waste was shipped as non-regulated liquid under Environmental Protection Agency (EPA) manifest 006640125FLE. The Permittees corrected the waste profile form with the offsite facility. Both the LANL waste profile form and the corrected Veolia waste profile form are enclosed.

Per the NMED-HWB email request on June 24, 2014, the following questions are addressed below, as related to this waste container.

1. The unique waste stream identifier for the subject stream
See the attached Enclosure 1
2. The active waste profile form for the stream at the time of the notification
See the attached Enclosure 1

3. Documentation for the basis of the waste profile (analytical data if available, or documentation supporting the use of AK)
See the attached Enclosure 1
4. The date and result of the most recent characterization review
The waste profile was activated in 2007. A yearly review is conducted to ensure that there are no changes in the process, generator or waste management coordinator. The most recent review was conducted on March 24, 2014.
5. The location where the stream is generated (if not included on the WPF)
See the attached Enclosure 1
6. A detailed description of the waste stream generation process that includes all relevant material inputs or other information that identifies the chemical content and physical form of the waste
The hydrofluoric reactor located at TA-46-31 neutralizes hydrofluoric gas by bubbling it through an aqueous solution of calcium hydroxide. The hydrofluoric gas reacts to form solid calcium fluoride, resulting in a waste that consists of an aqueous solution of calcium hydroxide with a suspension of calcium fluoride solids.
7. A description of the variability of the waste stream or process that might cause pH differences
The generator has concluded that the decrease in pH is the result of hydrofluoric acid that was not reacted after the calcium hydroxide filter media was exhausted.
8. A history of the stream (*i.e.*, when first generated, approximate quantities generated per month, the number and times of off-site shipment)
The waste stream was activated in 2007.
2007 - 17 liters was generated; 5 containers shipped
2008 - 11 liters was generated; 5 containers shipped
2009 - 2 liters was generated; 1 container shipped
2010 - 2 liters was generated; 1 container shipped
2013 - 5 gallons was generated; 1 container shipped
9. Steps taken to recharacterize the waste stream as required by Permit Section 2.4.7(4) prior to any future off-site shipments (including analytical data if available, or documentation supporting the use of AK)
Waste shipments characterized under this waste profile have been paused. This waste stream will be recharacterized, sampled and re-profiled.
10. What checks (and results), in addition to pH, were performed by the TSDF when the pH variance was identified
In accordance with the email sent to the Permittees on July 15, 2014, the types of checks performed on the waste include a basic fingerprint analysis. The pH was also measured using a strip and a probe, a visual of the waste was conducted, as well as a test to determine if the waste was flammable. If the waste burned then a flash point was conducted.

11. An explanation of why an antifreeze might be, or need to be, so basic
The waste stream associated with waste container W743790 is not antifreeze.
12. A listing of the rules violated due to the mischaracterization of the stream
The generator improperly characterized the waste stream as required by Permit Section 2.4.1. As a result, the generator failed to make a hazardous waste determination in accordance with 40 Code of Federal Register (CFR) 262.11.

The Permittees notified the NMED-HWB via email on July 18, 2014 and has therefore met the three day notification as required in Permit Section 2.4.7(4). This letter serves as the formal follow-up to the email.

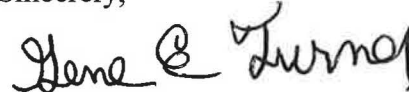
If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or Mark P. Haagenstad (LANS) at (505) 665-2014.

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/kt

Enclosure 1: LANL Waste Profile Form
Enclosure 2: Corrected Veolia Waste Profile Form

Cy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Tim Hall, NMED/HWB, Santa Fe, NM, (E-File)
Steve Pullen, NMED/HWB, Santa Fe, NM (E-File)
Peter Maggione, 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)
Alison M. Dorries, ENV-DO, (E-File)
Steven J. Singledecker, WM-SVS, (E-File)
Robert L. Dodge, WM-DO, (E-File)
Ronnie A. Garcia, WM-SVS, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Tammy A. Diaz, ENV-CP, (E-File)

Mr. John E. Kieling
ENV-DO-14-0196

- 4 -

Cy (continued):

lasomailbox@nnsa.doe.gov, (E-File)

locatesteam@lanl.gov, (E-File)

env-correspondence@lanl.gov, (E-File)



COPY



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RECEIVED

AUG 22 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:

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ENCLOSURE 1

Waste Profile Form

ENV-DO-14-0196

LAUR-14-26225

Date: **AUG 22 2014** _____



WASTE PROFILE FORM COVER SHEET

19952
APPROVED

Waste Characterization Information

Waste Stream ID: 19952
WPF ID (Legacy): 39841
Waste Stream Name: THE HF REACTOR LOCATED AT TA46-31-151 NETURALIZES HF GAS BY BUBBLING HF GAS THROUGH AN AQUEOUS SOLUTION OF CALCIUM HY...
Expiration Date: 04/20/2015
Waste Type: Solid Waste - Other
Radiological Type: Non Radioactive
RCRA Category: RCRA Solid Non-hazardous
Ancillary Types:
Primary Composition: Chemical
Composition (other):
EPA Codes:
Waste Acceptance:
EPA Form Code:
EPA Source Code:

Waste Generation Estimates

YEAR	VOLUME
2007	0.50 CM



WASTE PROFILE FORM

Reference Number	
WCATS ID 19952	Legacy WPF ID 39841

Generator's Z Number 115205	Waste Generator's Name (print) HEHLEN, MARKUS P	WMC's Z Number 193789	WMC's Name (print) SANDOVAL, SUNEE R	Generator's Phone 5056651737
Generator's Mail Stop E546	Waste Generating Group C-ADI	Waste Stream Technical Area 46	Building 000031	Room 151
Waste Accumulation (check only one) ☒ Satellite Accumulation Area Site No: <u>3283</u> ☐ Less-than-90 Days Storage Area Site No: _____ ☐ TSDF Site No: _____ ☐ Universal Waste Storage Area Site No: _____ ☐ Used Oil for Recycle Site No: _____ ER Use Only ☐ ER Site SWMU/AOC No. _____			☐ PCBs Storage Area Site No: _____ ☐ NM Special Waste Site No: _____ ☐ Rad Staging Area Site No: _____ ☐ Rad Storage Area Site No: _____ ☐ None of the Above Site No: _____	
Method of Characterization (check as many as apply) ☐ Chemical/Physical Analysis ☐ Attached Sample No: _____ ☐ Radiological Analysis ☐ Attached Sample No: _____ ☐ PCB Analysis ☐ Attached Sample No: _____ ☒ Acceptable Knowledge Documentation ☐ Attached Documentation No: GLASS LABORATORY NOTEBOOK ☐ Material Safety Data Sheet (MSDS) ☐ Attached				

Section 1 - Waste Prevention/Minimization (answer all questions)

Can hazard segregation, elimination, or material substitution be used?	☐ Yes (provide comments)	☒ No
Can any of the materials in the waste stream be recycled or reused?	☐ Yes (provide comments)	☒ No
Has waste minimization been incorporated into procedures or other process controls?	☒ Yes	☐ No (provide comments)
Can this waste be generated outside a RCA?	☐ Yes (provide comments)	☐ No ☒ N/A
Comments:		

Section 2 - Chemical and Physical Information

Waste Type (check only one) ☐ Unused/Unspent Chemical ☒ Process Waste/Spent Chemical/Other	Waste Category (check all that apply) ☒ Inorganic ☐ Organic ☐ Solvent (see instructions) ☐ Degreaser (see instructions) ☐ Dioxin ☐ Electroplating ☐ Treated Hazardous Waste or Residue ☐ No-Longer Contained-In ☐ Explosive Process ☐ Infectious/Medical ☐ Biological ☐ Beryllium ☐ Empty Container (see instructions) ☐ Battery (see instructions) Asbestos ☐ Friable ☐ Non-Friable PCB Source Concentration ☐ PCB < 50 ppm ☐ PCB >= 50 - < 500 ppm ☐ PCB >= 500 ppm ☐ Hazardous Waste Contaminated Soil ☐ Untreated Hazardous Debris ☐ Commercial Solid Waste ☐ Other [Describe]	Waste Source (check only one) Waste Source A ☐ Decon ☐ Materials Processing/Production ☒ Research/Development/Testing ☐ Scheduled Maintenance ☐ Housekeeping - Routine ☐ Spill Cleanup - Routine ☐ Sampling - Routine Monitoring ☐ Other (describe) Waste Source B ☐ Abatement ☐ Construction/Upgrades ☐ Demolition ☐ Decon/Decom ☐ Investigative Derived ☐ Orphan/Legacy ☐ Remediation/Restoration ☐ Repacking (secondary) ☐ Unscheduled Maintenance ☐ Housekeeping (non-routine) ☐ Spill Cleanup (non-routine) ☐ Non-Petroleum Tanks ☐ Petroleum Tanks ☐ Other (describe)	Waste Matrix (check only one) Gas ☐ ≤1.5 Atmospheres Pressure ☐ >1.5 Atmospheres Pressure ☐ Liquefied Compressed Gas Liquid ☐ Aqueous ☐ Non-Aqueous ☒ Suspended Solids/Aqueous ☐ Suspended Solids/Non-Aqueous Solid ☐ Powder/Ash/Dust ☐ Solid ☐ Sludge ☐ Absorbed/Solidified Liquid ☐ Debris Matrix Type (check only one) ☒ Homogeneous ☐ Heterogeneous Estimate Annual Volume (m³): 0.5000
Classified Information ☐ Unclassified ☐ Classified/Sensitive	Other:	Other:	

Section 3 - Process and Waste Description

Process Description:

THE HF REACTOR LOCATED AT TA46-31-151 NETURALIZES HF GAS BY BUBBLING HF GAS THROUGH AN AQUEOUS SOLUTION OF CALCIUM HYDROXIDE. THE HF REACTS TO FORM SOLID CALCIUM FLUORIDE.

Waste Description:

THE WASTE CONSISTS OF AN AQUEOUS SOLUTION OF CALCIUM HYDROXIDE WITH A SUSPENSION OF CALCIUM FLUORIDE SOLIDS.

Section 4 - Characteristics

Ignitability (check only one) ☐ < 73 F (< 22.8 C) ☐ 73 - 99 F (22.8 - 37.2 C) ☐ 100 - 139 F (37.8 - 59.4 C) ☐ 140 - 200 F (60.0 - 99.3 C) ☐ > 200 (> 99.3 C) ☐ EPA Ignitable - Non-liquid ☐ DOT Flammable Gas ☐ DOT Oxidizer ☒ Not Ignitable	Corrosivity (check only one) (pH) ☐ <= 2.0 ☐ 2.1 - 4.0 ☐ 4.1 - 6.0 ☒ 6.1 - 9.0 ☐ 9.1 - 12.4 ☐ >= 12.5 ☐ Liquid Corrosive to Steel ☐ Non-aqueous	Reactivity (check as many as apply) ☐ RCRA Unstable ☐ Water Reactive ☐ Cyanide Bearing ☐ Sulfide Bearing ☐ Pyrophoric ☐ Shock Sensitive ☐ Explosive [Specify DOT Div.] ☒ Non-Reactive	Boiling Point (check only one) ☐ <= 95 F (<= 35 C) ☒ >95 F (> 35 C) ☐ Not Applicable
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Identify for all contaminants listed	Characterization Method				Concentration of Contaminants		Regulatory Limit
	AK	TCLP	Total	None or Non-detect	Minimum	Maximum	
Toxicity Characteristic Metals	(10,000 ppm = 1%)						
Arsenic	☐	☐	☐	☐	to	ppm	5.0 ppm
Barium	☐	☐	☐	☐	to	ppm	100.0 ppm
Cadmium	☐	☐	☐	☐	to	ppm	1.0 ppm
Chromium	☐	☐	☐	☐	to	ppm	5.0 ppm
Lead	☐	☐	☐	☐	to	ppm	5.0 ppm
Mercury	☐	☐	☐	☐	to	ppm	0.2 ppm
Selenium	☐	☐	☐	☐	to	ppm	1.0 ppm
Silver	☐	☐	☐	☐	to	ppm	5.0 ppm
Toxicity Characteristic Organics							
Benzene	☐	☐	☐	☐	to	ppm	0.5 ppm
Carbon tetrachloride	☐	☐	☐	☐	to	ppm	0.5 ppm
Chlorobenzene	☐	☐	☐	☐	to	ppm	100.0 ppm
Chloroform	☐	☐	☐	☐	to	ppm	6.0 ppm
Cresol	☐	☐	☐	☐	to	ppm	200.0 ppm
p-Cresol	☐	☐	☐	☐	to	ppm	200.0 ppm
m-Cresol	☐	☐	☐	☐	to	ppm	200.0 ppm
o-Cresol	☐	☐	☐	☐	to	ppm	200.0 ppm
1,4-Dichlorobenzene	☐	☐	☐	☐	to	ppm	7.5 ppm
1,2-Dichloroethane	☐	☐	☐	☐	to	ppm	0.5 ppm
1,1-Dichloroethylene	☐	☐	☐	☐	to	ppm	0.7 ppm
2,4-Dinitrotoluene	☐	☐	☐	☐	to	ppm	0.13 ppm
Hexachlorobenzene	☐	☐	☐	☐	to	ppm	0.13 ppm
Hexachlorobutadiene	☐	☐	☐	☐	to	ppm	0.5 ppm
Hexachloroethane	☐	☐	☐	☐	to	ppm	3.0 ppm
Methyl ethyl ketone	☐	☐	☐	☐	to	ppm	200.0 ppm
Nitrobenzene	☐	☐	☐	☐	to	ppm	2.0 ppm
Pentachlorophenol	☐	☐	☐	☐	to	ppm	100.0 ppm
Pyridine	☐	☐	☐	☐	to	ppm	5.0 ppm
Tetrachloroethylene	☐	☐	☐	☐	to	ppm	0.7 ppm
Trichloroethylene	☐	☐	☐	☐	to	ppm	0.5 ppm
2,4,6-Trichlorophenol	☐	☐	☐	☐	to	ppm	2.0 ppm
2,4,5-Trichlorophenol	☐	☐	☐	☐	to	ppm	400.0 ppm
Vinyl chloride	☐	☐	☐	☐	to	ppm	0.2 ppm
Herbicides and Pesticides							
Chlordane	☐	☐	☐	☐	to	ppm	0.03 ppm
2,4-D	☐	☐	☐	☐	to	ppm	10.0 ppm
Endrin	☐	☐	☐	☐	to	ppm	0.02 ppm
Heptachlor (& its epoxide)	☐	☐	☐	☐	to	ppm	0.008 ppm
Lindane (gamma-BHC)	☐	☐	☐	☐	to	ppm	0.4 ppm
Methoxychlor	☐	☐	☐	☐	to	ppm	10.0 ppm
2,4,5-TP (Silvex)	☐	☐	☐	☐	to	ppm	1.0 ppm
Toxaphene	☐	☐	☐	☐	to	ppm	0.5 ppm

Additional Constituents and Contaminants. Please account for 100% of waste. Range should be given within guidelines of individual constituents. List all other constituents (including inerts) not identified above and attach any applicable analysis. No chemical formula allowed in this field. Continue in Section 3 Additional information as necessary. CAS numbers are needed for all chemical constituents, for material without a CAS number, enter "No CAS Number".

Section 6 - Work Control Documentation	
Do the procedures for this process cover how to manage this waste?	☒ Yes ☐ No <i>(provide comments)</i>
Do the procedures for this process address controls to prevent changes to waste constituents and concentrations or addition or removal of waste to/from containers?	☒ Yes ☐ No <i>(provide comments)</i>
Comments:	

Describe how the waste will be packaged in according to the applicable WAC. COMPATIBLE CONTAINERS PRIOR TO PACKAGING IN DOT APPROVED CONTAINERS.
Identify the storage management controls that will be used for this waste stream: <i>(check all that apply)</i> ☐ Tamper Indication Devices ☐ Limited use locks with log-in for waste ☒ Locked cabinet or building ☐ Other (describe)

☒	Waste appears to meet WAC attachment for: SW-OTHER
☐	Waste stream needs exception/exemption for treatment, storage, or disposal.
☐	Waste does not meet the criteria for any known TSDF. (DOE approval is required. Contact the office of the Principle Associate Director for Weapons Programs [PADWP] for assistance.)
Waste Generator Certification: Based on my knowledge of the waste and/or chemical/physical analysis, I certify that the waste characterization information on this form is correct and that it meets the requirements of the applicable waste acceptance criteria. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.	
Signature: <u>WCATS APPLICATION (000000)</u> Date: <u>01/03/07 12:00 AM</u>	
Waste Management Coordinator: I have reviewed this form and any associated attachments and the characterization information provided appears to be complete and accurate. I certify, to the best of my knowledge, that the waste characterization information provided by the waste generator meets the requirements of the applicable WAC.	
Signature: <u>WCATS APPLICATION (000000)</u> Date: <u>01/03/07 12:00 AM</u>	

Attachment 4 - LDR and UHC

Identify category and presence of any constituents listed below (equal to or above limit).

Non-Wastewater/Wastewater Category (check only one)

☐ Non Wastewater ☐ Wastewater [as defined by 40 CFR 268.2(f)] ☐ Lab Pack [40 CFR 268.2(f)] **Sign Certification #1**

Notifications and Certifications - Check the applicable boxes

Generator Requirements:

☐ This shipment contains hazardous waste contaminated soil that does not meet treatment standards **Sign Certification #2**
☐ This shipment contains untreated hazardous debris to be treated to 40 CFR 268.45 treatment standards **(No certification)**
☐ Hazardous wastes (except soil) meeting treatment standards at point of generation **Sign Certification #3**
☐ Hazardous wastes contaminated soil meeting treatment standards at point of generation **Sign Certification #4**

TSDF or Generator Treatment:

☐ TSDF treated hazardous debris meeting the alternative treatment standards of 40 CFR 268.45 **Sign Certification #5**
☐ Generator treated hazardous debris meeting the alternative treatment standards of 40 CFR 268.45 **Sign Certification #6**
☐ Hazardous wastes contaminated soil treated to 40 CFR 268.49 **Sign Certification #7**
☐ Wastes or residues from characteristic hazardous waste treatment meeting treatment standards and UTS **Sign Certification #8**
☐ Wastes or residues from characteristic hazardous waste treatment not meeting UTS **Sign Certification #9**
☐ Other TSDF wastes meeting the more stringent 40 CFR 268.40 treatment standards to be land disposed **Sign Certification #10**
☐ Other generator wastes meeting the more stringent 40 CFR 268.40 treatment standards to be land disposed **Sign Certification #11**

Notification of Underlying Hazardous Constituents

(Check the applicable underlying constituents above the concentration levels for D001 through D043 characteristic wastes only)

☐ **No Underlying Hazardous Constituents in this waste stream.**

	Organic Constituents	CASRN	Wastewater Standard (mg/L)	Non Wastewater Standard (mg/kg unless noted otherwise)	Hazardous Soil 10Xs UTS (mg/kg unless noted otherwise)
☐	Acenaphthene	83-32-9	0.059	3.4	34.0
☐	Acenaphthylene	208-96-8	0.059	3.4	34.0
☐	Acetone	67-64-1	0.28	160.0	1600.0
☐	Acetonitrile	75-05-8	5.6	38.0	380.0
☐	Acetophenone	98-86-2	0.01	9.7	97.0
☐	2-Acetylaminofluorene	53-96-3	0.059	140.0	1400.0
☐	Acrolein	107-02-8	0.29	N/A	N/A
☐	Acrylamide	79-06-1	19.0	23.0	230.0
☐	Acrylonitrile	107-13-1	0.24	84.0	840.0
☐	Aldicarb sulfone	1646-88-4	0.056	0.28	2.8
☐	Aldrin	309-00-2	0.021	0.066	0.66
☐	4-Aminobiphenyl	92-67-1	0.13	N/A	N/A
☐	Aniline	62-53-3	0.81	14.0	140.0
☐	o-Anisidine	90-04-0	0.01	0.66	6.6
☐	Anthracene	120-12-7	0.059	3.4	34.0
☐	Aramite	140-57-8	0.36	N/A	N/A
☐	alpha-BHC	319-84-6	0.00014	0.066	0.66
☐	beta-BHC	319-85-7	0.00014	0.066	0.66
☐	delta-BHC	319-86-8	0.023	0.066	0.66
☐	Barban	101-27-9	0.056	1.4	14.0
☐	Bendiocarb	22781-23-3	0.056	1.4	14.0
☐	Benomyl	17804-35-2	0.056	1.4	14.0
☐	Benz[a]anthracene	56-55-3	0.059	3.4	34.0
☐	Benzal chloride	98-87-3	0.055	6.0	60.0
☐	Benzene	71-43-2	0.14	10.0	100.0
☐	Benzo(b)fluoranthene	205-99-2	0.11	6.8	68.0
☐	Benzo[a]pyrene	50-32-8	0.061	3.4	34.0
☐	Benzo[ghi]perylene	191-24-2	0.0055	1.8	18.0
☐	Benzo[k]fluoranthene	207-08-9	0.11	6.8	68.0
☐	Bis(2-Chloroethoxy)methane	111-91-1	0.036	7.2	72.0
☐	Bis(2-chloroethyl) ether	111-44-4	0.033	6.0	60.0
☐	Bis(2-chloroisopropyl) ether	39638-32-9	0.055	7.2	72.0
☐	Bis(2-ethylhexyl) phthalate	117-81-7	0.28	28.0	280.0
☐	Bromodichloromethane	75-27-4	0.35	15.0	150.0
☐	Bromomethane	74-83-9	0.11	15.0	150.0
☐	4-Bromophenyl phenyl ether	101-55-3	0.055	15.0	150.0
☐	n-Butyl alcohol	71-36-3	5.6	2.6	26.0
☐	Butyl benzyl phthalate	85-68-7	0.017	28.0	280.0
☐	Butylate	2008-41-5	0.042	1.4	14.0
☐	Carbaryl	63-25-2	0.006	0.14	1.4

	Organic Constituents	CASRN	Wastewater Standard (mg/L)	Non Wastewater Standard (mg/kg unless noted otherwise)	Hazardous Soil 10Xs UTS (mg/kg unless noted otherwise)
☐	Carbendazim	10605-21-7	0.056	1.4	14.0
☐	Carbofuran	1563-66-2	0.006	0.14	1.4
☐	Carbofuran phenol	1563-38-8	0.056	1.4	14.0
☐	Carbon disulfide	75-15-0	3.8	4.8	48.0
☐	Carbon tetrachloride	56-23-5	0.057	6.0	60.0
☐	Carbosulfan	55285-14-8	0.028	1.4	14.0
☐	Chlordane	57-74-9	0.0033	0.26	2.6
☐	p-Chloro-m-cresol	59-50-7	0.018	14.0	140.0
☐	p-Chloroaniline	106-47-8	0.46	16.0	160.0
☐	Chlorobenzene	108-90-7	0.057	6.0	60.0
☐	Chlorobenzilate	510-15-6	0.1	N/A	N/A
☐	Chlorodibromomethane	124-48-1	0.057	15.0	150.0
☐	Chloroethane	75-00-3	0.27	6.0	60.0
☐	2-Chloroethyl vinyl ether	110-75-8	0.062	N/A	N/A
☐	Chloroform	67-66-3	0.046	6.0	60.0
☐	Chloromethane	74-87-3	0.19	30.0	300.0
☐	2-Chloronaphthalene	91-58-7	0.055	5.6	56.0
☐	2-Chlorophenol	95-57-8	0.044	5.7	57.0
☐	Chloroprene	126-99-8	0.057	0.28	2.8
☐	3-Chloropropylene	107-05-1	0.036	30.0	300.0
☐	Chrysene	218-01-9	0.059	3.4	34.0
☐	p-Cresidine	120-71-8	0.01	0.66	6.6
☐	m-Cresol	108-39-4	0.77	5.6	56.0
☐	o-Cresol	95-48-7	0.11	5.6	56.0
☐	p-Cresol	106-44-5	0.77	5.6	56.0
☐	m-Cumenyl methylcarbamate	64-00-6	0.056	1.4	14.0
☐	Cyanide (Amenable)	57-12-5*	0.86	30.0	300.0
☐	Cyanide (Total)	57-12-5	1.2	590.0	5900.0
☐	Cyclohexanone	108-94-1	0.36	0.75	7.5
☐	2,4-D	94-75-7	0.72	10.0	100.0
☐	o,p'-DDD	53-19-0	0.023	0.087	0.87
☐	p,p'-DDD	72-54-8	0.023	0.087	0.87
☐	o,p'-DDE	3424-82-6	0.031	0.087	0.87
☐	p,p'-DDE	72-55-9	0.031	0.087	0.87
☐	o,p'-DDT	789-02-6	0.0039	0.087	0.87
☐	p,p'-DDT	50-29-3	0.0039	0.087	0.87
☐	Di-n-butyl phthalate	84-74-2	0.057	28.0	280.0
☐	Di-n-octyl phthalate	117-84-0	0.017	28.0	280.0
☐	Di-n-propylnitrosamine	621-64-7	0.4	14.0	140.0
☐	Dibenz[a,h]anthracene	53-70-3	0.055	8.2	82.0
☐	Dibenzo[a,e]pyrene	192-65-4	0.061	N/A	N/A
☐	1,2-Dibromo-3-chloropropane	96-12-8	0.11	15.0	150.0
☐	1,2-Dibromoethane	106-93-4	0.028	15.0	150.0
☐	Dibromomethane	74-95-3	0.11	15.0	150.0
☐	1,4-Dichlorobenzene	106-46-7	0.09	6.0	60.0
☐	m-Dichlorobenzene	541-73-1	0.036	6.0	60.0
☐	o-Dichlorobenzene	95-50-1	0.088	6.0	60.0
☐	Dichlorodifluoromethane	75-71-8	0.23	7.2	72.0
☐	1,1-Dichloroethane	75-34-3	0.059	6.0	60.0
☐	1,2-Dichloroethane	107-06-2	0.21	6.0	60.0
☐	1,1-Dichloroethylene	75-35-4	0.025	6.0	60.0
☐	trans-1,2-Dichloroethylene	156-60-5	0.054	30.0	300.0
☐	2,4-Dichlorophenol	120-83-2	0.044	14.0	140.0
☐	2,6-Dichlorophenol	87-65-0	0.044	14.0	140.0
☐	1,2-Dichloropropane	78-87-5	0.85	18.0	180.0
☐	trans-1,3-Dichloropropene	10061-02-6	0.036	18.0	180.0
☐	cis-1,3-Dichloropropylene	10061-01-5	0.036	18.0	180.0
☐	Dieldrin	60-57-1	0.017	0.13	1.3
☐	Diethyl phthalate	84-66-2	0.2	28.0	280.0

	Organic Constituents	CASRN	Wastewater Standard (mg/L)	Non Wastewater Standard (mg/kg unless noted otherwise)	Hazardous Soil 10Xs UTS (mg/kg unless noted otherwise)
☐	Dimethyl phthalate	131-11-3	0.047	28.0	280.0
☐	p-Dimethylaminoazobenzene	60-11-7	0.13	N/A	N/A
☐	2,4-Dimethylphenol	105-67-9	0.036	14.0	140.0
☐	4,6-Dinitro-o-cresol	534-52-1	0.28	160.0	1600.0
☐	1,4-Dinitrobenzene	100-25-4	0.32	2.3	23.0
☐	2,4-Dinitrophenol	51-28-5	0.12	160.0	1600.0
☐	2,4-Dinitrotoluene	121-14-2	0.32	140.0	1400.0
☐	2,6-Dinitrotoluene	606-20-2	0.55	28.0	280.0
☐	Dinoseb	88-85-7	0.066	2.5	25.0
☐	1,4-Dioxane	123-91-1	12.0	170.0	1700.0
☐	Diphenylamine	122-39-4	0.92	13.0	130.0
☐	1,2-Diphenylhydrazine	122-66-7	0.087	N/A	N/A
☐	Disulfoton	298-04-4	0.017	6.2	62.0
☐	Dithiocarbamates (total)	WCATS-001	0.028	28.0	280.0
☐	EPTC	759-94-4	0.042	1.4	14.0
☐	Endosulfan I	959-98-8	0.023	0.066	0.66
☐	Endosulfan II	33213-65-9	0.029	0.13	1.3
☐	Endosulfan sulfate	1031-07-8	0.029	0.13	1.3
☐	Endrin	72-20-8	0.0028	0.13	1.3
☐	Endrin aldehyde	7421-93-4	0.025	0.13	1.3
☐	Ethyl acetate	141-78-6	0.34	33.0	330.0
☐	Ethyl benzene	100-41-4	0.057	10.0	100.0
☐	Ethyl ether	60-29-7	0.12	160.0	1600.0
☐	Ethyl methacrylate	97-63-2	0.14	160.0	1600.0
☐	Ethylene oxide	75-21-8	0.12	N/A	N/A
☐	Famphur	52-85-7	0.017	15.0	150.0
☐	Fluoranthene	206-44-0	0.068	3.4	34.0
☐	Fluorene	86-73-7	0.059	3.4	34.0
☐	Fluoride	16984-48-8	35.0	N/A	N/A
☐	Formetanate hydrochloride	23422-53-9	0.056	1.4	14.0
☐	Heptachlor (& its epoxide)	76-44-8	0.0012	0.066	0.66
☐	Heptachlor epoxide	1024-57-3	0.016	0.066	0.66
☐	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	35822-46-9	0.000035	0.0025	0.025
☐	1,2,3,4,6,7,8-Heptachlorodibenzofuran	67562-39-4	0.000035	0.0025	0.025
☐	1,2,3,4,7,8,9-Heptachlorodibenzofuran	55673-89-7	0.000035	0.0025	0.025
☐	Hexachlorobenzene	118-74-1	0.055	10.0	100.0
☐	Hexachlorobutadiene	87-68-3	0.055	5.6	56.0
☐	Hexachlorocyclopentadiene	77-47-4	0.057	2.4	24.0
☐	Hexachloroethane	67-72-1	0.055	30.0	300.0
☐	Hexachloropropene	1888-71-7	0.035	30.0	300.0
☐	HxCDDs (All Hexachlorodibenzo-p-dioxins)	34465-46-8	0.000063	0.001	0.01
☐	HxCDFs (All Hexachlorodibenzo-furans)	55684-94-1	0.000063	0.001	0.01
☐	Indeno[1,2,3-cd]pyrene	193-39-5	0.0055	3.4	34.0
☐	Iodomethane	74-88-4	0.19	65.0	650.0
☐	Isobutyl alcohol	78-83-1	5.6	170.0	1700.0
☐	Isodrin	465-73-6	0.021	0.066	0.66
☐	Isosafrole	120-58-1	0.081	2.6	26.0
☐	Kepone	143-50-0	0.0011	0.13	1.3
☐	Lindane (gamma-BHC)	58-89-9	0.0017	0.066	0.66
☐	Mercury (Retort Residues)	7439-97-6*	N/A	0.2	2.0
☐	Methacrylonitrile	126-98-7	0.24	84.0	840.0
☐	Methanol	67-56-1	5.6	0.75	7.5
☐	Methapyrilene	91-80-5	0.081	1.5	15.0
☐	Methiocarb	2032-65-7	0.056	1.4	14.0
☐	Methomyl	16752-77-5	0.028	0.14	1.4
☐	Methoxychlor	72-43-5	0.25	0.18	1.8
☐	Methyl ethyl ketone	78-93-3	0.28	36.0	360.0
☐	Methyl isobutyl ketone	108-10-1	0.14	33.0	330.0
☐	Methyl methacrylate	80-62-6	0.14	160.0	1600.0

	Organic Constituents	CASRN	Wastewater Standard (mg/L)	Non Wastewater Standard (mg/kg unless noted otherwise)	Hazardous Soil 10Xs UTS (mg/kg unless noted otherwise)
☐	Methyl methanesulfonate	66-27-3	0.018	N/A	N/A
☐	Methyl parathion	298-00-0	0.014	4.6	46.0
☐	3-Methylcholanthrene	56-49-5	0.0055	15.0	150.0
☐	4,4'-Methylene bis(2-chloroaniline)	101-14-4	0.5	30.0	300.0
☐	Methylene chloride	75-09-2	0.089	30.0	300.0
☐	Metolcarb	1129-41-5	0.056	1.4	14.0
☐	Mexacarbate	315-18-4	0.056	1.4	14.0
☐	Molinate	2212-67-1	0.042	1.4	14.0
☐	N-Nitroso-di-n-butylamine	924-16-3	0.4	17.0	170.0
☐	N-Nitrosodiethylamine	55-18-5	0.4	28.0	280.0
☐	N-Nitrosodimethylamine	62-75-9	0.4	2.3	23.0
☐	N-Nitrosodiphenylamine	86-30-6	0.92	13.0	130.0
☐	N-Nitrosomethylethylamine	10595-95-6	0.4	2.3	23.0
☐	N-Nitrosomorpholine	59-89-2	0.4	2.3	23.0
☐	N-Nitrosopiperidine	100-75-4	0.013	35.0	350.0
☐	N-Nitrosopyrrolidine	930-55-2	0.013	35.0	350.0
☐	Naphthalene	91-20-3	0.059	5.6	56.0
☐	2-Naphthylamine	91-59-8	0.52	N/A	N/A
☐	5-Nitro-o-toluidine	99-55-8	0.32	28.0	280.0
☐	o-Nitroaniline	88-74-4	0.27	14.0	140.0
☐	p-Nitroaniline	100-01-6	0.028	28.0	280.0
☐	Nitrobenzene	98-95-3	0.068	14.0	140.0
☐	o-Nitrophenol	88-75-5	0.028	13.0	130.0
☐	p-Nitrophenol	100-02-7	0.12	29.0	290.0
☐	1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	3268-87-9	0.000063	0.005	0.05
☐	1,2,3,4,6,7,8,9-Octachlorodibenzofuran	39001-02-0	0.000063	0.005	0.05
☐	Oxamyl	23135-22-0	0.056	0.28	2.8
☐	Parathion	56-38-2	0.014	4.6	46.0
☐	PeCDDs (All Pentachlorodibenzo-p-dioxins)	36088-22-9	0.000063	0.001	0.01
☐	PeCDFs (All Pentachlorodibenzo-furans)	30402-15-4	0.000035	0.001	0.01
☐	Pebulate	1114-71-2	0.042	1.4	14.0
☐	Pentachlorobenzene	608-93-5	0.055	10.0	100.0
☐	Pentachloroethane	76-01-7	0.055	6.0	60.0
☐	Pentachloronitrobenzene	82-68-8	0.055	4.8	48.0
☐	Pentachlorophenol	87-86-5	0.089	7.4	74.0
☐	Phenacetin	62-44-2	0.081	16.0	160.0
☐	Phenanthrene	85-01-8	0.059	5.6	56.0
☐	Phenol	108-95-2	0.039	6.2	62.0
☐	o-Phenylenediamine	95-54-5	N/A	N/A	N/A
☐	Phorate	298-02-2	0.021	4.6	46.0
☐	Phthalic acid	100-21-0	0.055	28.0	280.0
☐	Phthalic anhydride	85-44-9	0.055	28.0	280.0
☐	Physostigmine	57-47-6	0.056	1.4	14.0
☐	Physostigmine salicylate	57-64-7	0.056	1.4	14.0
☐	Promecarb	2631-37-0	0.056	1.4	14.0
☐	Pronamide	23950-58-5	0.093	1.5	15.0
☐	Propanenitrile	107-12-0	0.24	360.0	3600.0
☐	Propham	122-42-9	0.056	1.4	14.0
☐	Propoxur	114-26-1	0.056	1.4	14.0
☐	Prosulfocarb	52888-80-9	0.042	1.4	14.0
☐	Pyrene	129-00-0	0.067	8.2	82.0
☐	Pyridine	110-86-1	0.014	16.0	160.0
☐	Safrole	94-59-7	0.081	22.0	220.0
☐	Sulfide	18496-25-8	14.0	N/A	N/A
☐	2,4,5-T	93-76-5	0.72	7.9	79.0
☐	TCDDs (All Tetrachlorodi-benzo-p-dioxins)	41903-57-5	0.000063	0.001	0.01
☐	TCDFs (All Tetrachlorodibenzofurans)	30402-14-3	0.000063	0.001	0.01
☐	2,4,5-TP (Silvex)	93-72-1	0.72	7.9	79.0
☐	1,2,4,5-Tetrachlorobenzene	95-94-3	0.055	14.0	140.0

	Organic Constituents	CASRN	Wastewater Standard (mg/L)	Non Wastewater Standard (mg/kg unless noted otherwise)	Hazardous Soil 10Xs UTS (mg/kg unless noted otherwise)
☐	1,1,1,2-Tetrachloroethane	630-20-6	0.057	6.0	60.0
☐	1,1,1,2,2-Tetrachloroethane	79-34-5	0.057	6.0	60.0
☐	Tetrachloroethylene	127-18-4	0.056	6.0	60.0
☐	2,3,4,6-Tetrachlorophenol	58-90-2	0.03	7.4	74.0
☐	Thiodicarb	59669-26-0	0.019	1.4	14.0
☐	Thiophanate-methyl	23564-05-8	0.056	1.4	14.0
☐	Toluene	108-88-3	0.08	10.0	100.0
☐	Total PCBs (Polychlorinated biphenyls)	1336-36-3	0.1	10.0	100.0
☐	Toxaphene	8001-35-2	0.0095	2.6	26.0
☐	Triallate	2303-17-5	0.042	1.4	14.0
☐	Tribromomethane	75-25-2	0.63	15.0	150.0
☐	2,4,6-Tribromophenol	118-79-6	0.035	7.4	74.0
☐	1,1,2-Trichloro-1,2,2,-trifluoroethane	76-13-1	0.057	30.0	300.0
☐	1,2,4-Trichlorobenzene	120-82-1	0.055	19.0	190.0
☐	1,1,1-Trichloroethane	71-55-6	0.054	6.0	60.0
☐	1,1,2-Trichloroethane	79-00-5	0.054	6.0	60.0
☐	Trichloroethylene	79-01-6	0.054	6.0	60.0
☐	Trichloromonofluoromethane (R11)	75-69-4	0.02	30.0	300.0
☐	2,4,5-Trichlorophenol	95-95-4	0.18	7.4	74.0
☐	2,4,6-Trichlorophenol	88-06-2	0.035	7.4	74.0
☐	1,2,3-Trichloropropane	96-18-4	0.85	30.0	300.0
☐	Triethylamine	121-44-8	0.081	1.5	15.0
☐	Tris(2,3-dibromopropyl) phosphate	126-72-7	0.11	0.1	1.0
☐	Vernolate	1929-77-7	0.042	1.4	14.0
☐	Vinyl chloride	75-01-4	0.27	6.0	60.0
☐	Xylene	1330-20-7	0.32	30.0	300.0
☐	2,4-Xylidine	95-68-1	0.01	0.66	6.6
☐	Antimony	7440-36-0	1.9	1.15	11.5
☐	Arsenic	7440-38-2	1.4	5.0	50.0
☐	Barium	7440-39-3	1.2	21.0	210.0
☐	Beryllium	7440-41-7	0.82	1.22	12.2
☐	Cadmium	7440-43-9	0.69	0.11	1.1
☐	Chromium	7440-47-3	2.77	0.6	6.0
☐	Lead	7439-92-1	0.69	0.75	7.5
☐	Mercury	7439-97-6	0.15	0.025	0.25
☐	Nickel	7440-02-0	3.98	11.0	110.0
☐	Selenium	7782-49-2	0.82	5.7	57.0
☐	Silver	7440-22-4	0.43	0.14	1.4
☐	Thallium	7440-28-0	1.4	0.2	2.0
☐	Vanadium	7440-62-2	4.3	1.6	16.0
☐	Zinc	7440-66-6	2.61	4.3	43.0

Attachment 1 - Additional Radionuclides

Please list the supplementary radionuclides and their concentration values.

ENCLOSURE 2

Corrected Veolia Waste Profile Form

ENV-DO-14-0196

AUG 22 2014

Date: _____



WASTESTREAM INFORMATION PROFILE

WIP NO. **581081**

Disposal Code

☐ RecertificationVeolia Location HENDERSON FACILITY HENDERSON CO
OFFICE CITY ST☐ Invoice AddressVeolia TSDf requested _____ Technology requested _____
Generator No. 426268 Generator EPA ID No. NM0890010515

1. Generator Name	<u>LOS ALAMOS NATIONAL LABORATORY</u>	Generator State No.	_____
Address	<u>TA 54 MESITA DEL BUEY ,PO BOX 1663 MS J595</u>	State	_____
City	<u>LOS ALAMOS</u>	Wastestream No.	_____
SIC Code <u>2899</u>	NAICS Codes <u> </u>	State <u>NM</u> Country <u>US</u> ZIP <u>87545-2201</u>	
		Source Code <u>G09</u> Origin <u>1</u> Form <u>W119</u>	System Type _____

2. Waste Name CALCIUM HYDROXIDE HF FILTER PROCESS Lab or Waste Area3. Process Generating Waste USED HF NUTRALIZER FILTER4. Shipping Name CORROSIVE LIQUID, ACIDIC, INORGANIC, n.o.s.Hazard Class 8 UN/NA No. UN3264 PG I RQ amt 100 lb Waste: Y PIH: N IH: N DWW: N P: NWastewater Yes No X

RQ Desc: 1.

2.

DOT Desc: 1. HYDROFLUORIC ACID

2.

5. Waste Codes Sub Category

D002

6. Physical and Chemical Properties (check all that apply)

pH

a X < 2b 2 - 5c 5 - 9d 9 - 12.5e > 12.5

other

Specific Gravity

a < 0.8b X 0.8 - 1.0c 1.0d 1.0 - 1.2e > 1.2

other

Flash Point (F)

a < 80b 80 - 100c 100 - 140d 140 - 200e > 200f X no flash

other

Solids

0 - 0 % suspended0 - 0 % settleable0 - 0 % dissolved0 - 0 % ash0 - 0 % water solubility0 - 0 BTU/lbFree Liquid Range 50 to 75%

Physical State

s solidm semi-solidl X liquidp pumpable semi-solid

Hazardous Characteristics

a air reactivew water reactivec cyanide reactivef sulfide reactiver radioactive or NRC regulateds shock sensitivet temp sensitivem polymerization/monomer

Odor

a X noneb mildc strong

describe

f ☐ flowable powder e ☐ explosive n ☐ OSHA carcinogen
g ☐ gas o ☐ oxidizing acid i ☐ infectious
a ☐ aerosol p ☐ peroxide former h ☐ inhalation hazard
r ☐ pressurized liquid
d ☐ debris per 40 CFR 268.45
h ☐ sharps
q ☐ pumpable liquid

Halogens

Br - % Bromine
Cl - % Chlorine
F - % Fluorine
I - % Iodine

Layers:	a ☐ multilayered:	b ☐ bi-layered:	c ☒ single phase:	Color
	Top Layer	Second Layer	Bottom Layer	
Viscosity	☐ high (syrup)	☐ high (syrup)	☐ high (syrup)	VAR
by	☐ medium (oil)	☐ medium (oil)	☐ medium (oil)	
Layer:	☒ low (water)	☐ low (water)	☐ low (water)	Light
	☐ solid	☐ solid	☐ solid	

Used oil y/n ☒ HOC < 1000 ppm ☐ or HOC > 1000 ppm ☐

7. Chemical Composition

[M = Marine Pollutant, S = Severe Marine Pollutant, O = Ozone Depleting Substance, U = Underlying Hazardous Constituent, B = Benzene NESHP, T = TRI Chemical, C = OSHA Carcinogen]

Constituents	Range	Units
CALCIUM FLUORIDE	10.00 - 45.00	%
CALCIUM HYDROXIDE	10.00 - 45.00	%
WATER	40.00 - 50.00	%
T HYDROFLUORIC ACID SOLUTION, NOT MORE THAN 60% STRENGTH	1.00 - 5.00	%

Total Composition Must Equal or Exceed 100%

Other

8. Is the wastestream being imported into the USA? Yes ☐ No ☒
9. Does the wastestream contain PCBs regulated by 40CFR? Yes ☐ No ☒
PCB concentration ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes ☐ No ☒
11. Is the wastestream subject to Benzene NESHP? Yes ☐ No ☒
If yes...
Is the wastestream subject to Notification and Control Requirements? Yes ☐ No ☒
Benzene concentration ppm
Does it contain >= 10% water? Yes ☐ No ☒
What is the TAB at your facility? Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes ☐ No ☒
Volatile organic concentration, if known ppmw
CC approved analytical method Generator Knowledge
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes ☐ No ☒

14. Container Information (Identify UN container marking if known)

Packaging: Bulk Solid ☐ Type/Size: Bulk Liquid ☐ Type/Size: Drum ☐ Type/Size:
Other
Shipping Frequency: Units Per Month ☐ Quarter ☒ Year ☐ One Time ☐ Other
UOM [Drums](#) Description

15. Additional Information

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

_____	_____	_____
NAME (PRINT OR TYPE)	PHONE	DATE
_____	_____	
SIGNATURE	TITLE	

FACILITY NOTIFICATION

If approved for management, Veolia Environmental Services has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.