



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

SEP 17 2014

Mr. John E. Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87508-6303

Subject: Update to the Information provided to the New Mexico Environment Department Regarding the WIPP Nitrate Salt Bearing Waste Container Isolation Plan dated September 5, 2014

Reference: New Mexico Environment Department Correspondence from Ryan Flynn, Secretary, to Jose Franco, Carlsbad Field Office and Robert L. McQuinn, Nuclear Waste Partnership LLC, dated August 7, 2014, subject: WIPP Nitrate Salt Bearing Waste Container Isolation Plan, Waste Isolation Pilot Plant, and EPA I.D. Number NM4890139088

Dear Mr. Kieling:

The purpose of this letter is to provide an additional hazardous waste manifest in response to the above referenced letter. The revision to this manifest was completed subsequent to the submittal of the requested information to the New Mexico Environment Department on September 5, 2014. The Manifest Number 010784205 JJK for Shipment LA130151 is included as an enclosure to this letter.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. George T. Basabilvazo at (575) 234-7488.

Sincerely,

Original Signatures on File

Jose R. Franco, Manager
Carlsbad Field Office

Robert L. McQuinn, Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure
R. Maestes, NMED *ED
CBFO M&RC
*ED denotes electronic distribution
CBFO:EPD:GTB:MN:14-2610: UFC 5486.00

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number NM0890010515	2. Page 1 of 1	3. Emergency Response Phone (505) 667-6211	4. Manifest Tracking Number 010784205 JJK
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5. Generator's Name and Mailing Address
LOS ALAMOS NATIONAL SECURITY, LLC ON BEHALF OF U.S. DOE
TA-54 WEST, BLDG. 38
LOS ALAMOS NM 87645
Generator's Phone: **(505) 665-6037**

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name
LANS, LLC FOR DOE

U.S. EPA ID Number
NM0890010515

7. Transporter 2 Company Name
CAST SPECIALTY INC.

U.S. EPA ID Number
COR000206722

8. Designated Facility Name and Site Address
U.S. DEPT. OF ENERGY C/O NUCLEAR WASTE PARTNERSHIP, LLC
30 MILES EAST OF CARLSBAD ON JAL HWY
CARLSBAD NM 88221
Facility's Phone: **(575) 234-8457**

U.S. EPA ID Number
NM4890139088

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol	13. Waste Codes		
		No.	Type			F001	F002	F005
RQ	¹ UN3328, Waste, Radioactive Material, Type B(U) Package, Fissile, 7, Am241 Pu239 Pu240, 3.766 TBq Solid Elemental, Radioactive Yellow-II, TI=0.4, CSI=0.0 USA/9218/ B(U)F-96, TP-146	1	CM	835	K	F001	F002	F005
						D004	D005	D006
RQ	² UN3328, Waste, Radioactive Material, Type B(U) Package, Fissile, 7, Am241 Pu239 Pu240, 2.792 TBq Solid Elemental, Radioactive Yellow-II, TI=0.4, CSI=0.0 USA/9218/ B(U)F-96, TP-210	1	CM	834	K	F001	F002	F004
						F005	D004	D005
RQ	³ UN3328, Waste, Radioactive Material, Type B(U) Package, Fissile, 7, Am241 Pu239 Pu240, 2.908 TBq Solid Elemental, Radioactive Yellow-II, TI=0.4, CSI=0.0 USA/9218/ B(U)F-96, TP-156	1	CM	698	K	F001	F002	F005
						D004	D005	D006
X								

14. Special Handling Instructions and Additional Information
SHIPMENT # LA130151, LANL POC: LANCE LACKAS (505) 699-7526, ERG #165, TRACTOR # C-39, TRAILER # V-373
GROSS WEIGHT IN KILOGRAMS: TP#146 = 6554 KG, TP#210 = 6701 KG, TP#156 = 6614 KG
EMERGENCY RESPONSE INFORMATION PROVIDER: LOS ALAMOS NATIONAL LABORATORY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: **LANCE LACKAS** Signature: *[Signature]* Month: **1** Day: **0** Year: **01 13**

16. International Shipments Import to U.S. Export from U.S. Part of entry/exit: _____ Date leaving U.S.: _____

Transporter signature (for exports only): _____

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: **Rick Tucker** Signature: *[Signature]* Month: **10** Day: **02** Year: **13**

Transporter 2 Printed/Typed Name: **Steve EASON** Signature: *[Signature]* Month: **10** Day: **02** Year: **13**

18. Discrepancy

18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection

SECTION 9b ITEMS 1, 2, 3: ADD SUBSIDIARY HAZARD DIVISION 5.1 AND HAZARD CLASS 80- EPA HAZARDOUS WASTE CODE D001

SEE ATTACHED FOR DETAILS ADD 9/21/14 Manifest Reference Number: _____

18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____

Facility's Phone: _____

18c. Signature of Alternate Facility (or Generator) _____ Month: _____ Day: _____ Year: _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H132	2. H132	3. H132	4.
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20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: **A. Kecker** Signature: *[Signature]* Month: **10** Day: **03** Year: **13**



Associate Director for ESH
Environment, Safety, and Health
P.O. Box 1663, MS K491
Los Alamos, New Mexico 87545
505-867-4218/Fax 505-865-3811

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 867-5784/Fax (505) 867-5948

Date: **AUG 13 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

PO Box 1663, MS A100, Los Alamos, NM 87545
505-667-5101 FAX 505-665-2679

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National Nuclear Security Administration of the U. S. Department of Energy

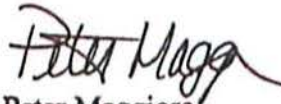
Number D001 for the characteristic of ignitability to certain nitrate salt-bearing waste containers stored at LANL.

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)
Victoria A. George, REG-DO, (E-File)
Anthony R. Grieggs, ENV-CP, (E-File)
Deborah K. Woitte, LC-ESH, (E-File)
Debra Nevergold, LTP, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatsteam@lanl.gov, (E-File)

Emplaced Containers from Waste Stream LA-MIN02-V.001:

Manifest	Shipment	Date Received	Container	Line Item	OverPack#
010784205JJK	LA130151	3-Oct-13	LA00000093515	1	N/A
010784205JJK	LA130151	3-Oct-13	LA00000093609	1	N/A
010784205JJK	LA130151	3-Oct-13	LA00000092680	2	N/A
010784205JJK	LA130151	3-Oct-13	LA00000093576	2	N/A
010784205JJK	LA130151	3-Oct-13	LA00000092919	3	N/A
010784205JJK	LA130151	3-Oct-13	LA00000093571	3	N/A
010784205JJK	LA130151	3-Oct-13	LA00000093610	3	N/A