



**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 <b>NM0890010515</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(505) 667-6211</b>	4. Manifest Tracking Number <b>010784205 JJK</b>
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5. Generator's Name and Mailing Address <b>LOS ALAMOS NATIONAL SECURITY, LLC ON BEHALF OF U.S. DOE TA-54 WEST, BLDG. 38 LOS ALAMOS NM 87645</b>		Generator's Site Address (if different than mailing address)	
Generator's Phone: <b>(505) 665-6037</b>			

6. Transporter 1 Company Name <b>LANS, LLC FOR DOE</b>	U.S. EPA ID Number <b>NM0890010515</b>
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7. Transporter 2 Company Name <b>CAST SPECIALTY INC.</b>	U.S. EPA ID Number <b>COR000206722</b>
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8. Designated Facility Name and Site Address <b>U.S. DEPT. OF ENERGY C/O NUCLEAR WASTE PARTNERSHIP, LLC 30 MILES EAST OF CARLSBAD ON JAL HWY CARLSBAD NM 88221</b>	U.S. EPA ID Number <b>NM4890139088</b>
Facility's Phone: <b>(575) 234-8457</b>	

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	<sup>1</sup> 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	<sup>2</sup> 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	<sup>3</sup> 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 <b>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</b>
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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 <b>LANCE LACKAS</b>	Signature <i>Lance Lackas</i>	Month <b>10</b>	Day <b>01</b>	Year <b>13</b>

16. International Shipments	<input type="checkbox"/> Import to U.S.	<input type="checkbox"/> Export from U.S.	Part of entry/exit: Date leaving U.S.:
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17. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name <b>Rick Tucker</b>	Signature <i>Rick Tucker</i>	Month <b>10</b>	Day <b>02</b>	Year <b>13</b>
Transporter 2 Printed/Typed Name <b>Steve EASON</b>	Signature <i>Steve Eason</i>	Month <b>10</b>	Day <b>02</b>	Year <b>13</b>

18. Discrepancy			
18a. Discrepancy Indication Space <b>SECTION 9b ITEMS 1, 2, 3: ADD SUBSIDIARY HAZARD DIVISION 5.1 AND HAZARD CLASS 80- SEE ATTACHED FOR DETAILS ADD 9/21/14</b>	<input type="checkbox"/> Quantity	<input checked="" type="checkbox"/> Type	<input type="checkbox"/> Residue
			<input type="checkbox"/> Partial Rejection <b>6/21/14</b>
			<input type="checkbox"/> Full Rejection
18b. Alternate Facility (or Generator)	U.S. EPA ID Number		

18c. Signature of Alternate Facility (or Generator)	Month <b>10</b>	Day <b>03</b>	Year <b>13</b>
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19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
1 <b>H132</b>	2 <b>H132</b>	3 <b>H132</b>	4

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 <b>A. Kecker</b>	Signature <i>A. Kecker</i>	Month <b>10</b>	Day <b>03</b>	Year <b>13</b>



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) 667-5794/Fax (505) 667-5948

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

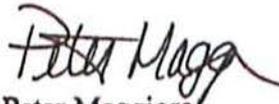
Number D001 for the characteristic of ignitability to certain nitrate salt-bearing waste containers stored at LANL.

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](mailto: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](mailto:lasomailbox@nnsa.doe.gov), (E-File)  
[locatsteam@lanl.gov](mailto:locatsteam@lanl.gov), (E-File)

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

<b>Manifest</b>	<b>Shipment</b>	<b>Date Received</b>	<b>Container</b>	<b>Line Item</b>	<b>OverPack#</b>
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