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Date: APR 03 2019
Refer To: N3B-19-0088

John Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Confirmation of Reclassification of Waste within Containers Located at Waste Control Specialists, LLC, in Andrews, Texas

Dear Mr. Kieling:

This letter reaffirms a 2018 decision, documented in Los Alamos National Laboratory (LANL) letter "Notification of Recharacterization of Waste within Containers Located at Waste Control Specialists LLC, Andrews, Texas" (EPC-DO: 18-328), regarding reclassification of waste within four containers located at Waste Control Specialists, LLC (WCS) in Andrews, Texas. Wastes within these containers originated at LANL and have been determined to not meet the definitions of ignitable or corrosive hazardous waste; therefore, the waste should not carry the U.S. Environmental Protection Agency Hazardous Waste Numbers D001 or D002.

A copy of the previous notification sent to WCS is enclosed and provides the technical basis for this decision. A shipment is being scheduled approximately 8 weeks from the date of this letter to remove this waste from WCS to the Waste Isolation Pilot Plant for disposal.

If you have any questions, please contact Frazer Lockhart at (505) 257-8049 (frazer.lockhart@em-la.doe.gov) or David Nickless at (505) 665-6448 (david.nickless@em.doe.gov).

Sincerely,

Frazer Lockhart
Program Manager
Regulatory and Stakeholder Interface
N3B-Los Alamos

Sincerely,

Arturo Q. Duran, Compliance and Permitting Manager
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

Enclosure(s): EPC-DO: 18-328, Notification of Recharacterization of Waste within Containers
Located at Waste Control Specialists LLC, Andrews, Texas

Cy: (date-stamped letter and enclosure[s] emailed)

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N3B Records

Public Reading Room (EPRR and HPRR)

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Date: **SEP 10 2018**

Symbol: EPC-DO: 18-328

LA-UR: 18-28142

Locates Action No.: N/A

Ryan Williams
Vice President of Integrated Services
Waste Control Specialists LLC
Three Lincoln Centre
5430 LBJ Freeway, Ste. 1700
Dallas, Texas 75240

Subject: Notification of Recharacterization of Waste within Containers Located at Waste Control Specialists LLC, Andrews, Texas

Dear Mr. Williams:

This letter submits notification to the receipt facility of recharacterization of waste within four containers located at your treatment, storage, and disposal facility at Andrews, Texas. Wastes within these containers originated at the Los Alamos National Laboratory (LANL) and have been determined to not meet the definitions of ignitable or corrosive hazardous waste; therefore, the waste should not carry the U.S. Environmental Protection Agency (EPA) Hazardous Waste Numbers D001 or D002. The following paragraphs outline why the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) originally deemed these containers to hold ignitable or corrosive waste and why the characterization has been updated.

After the February 14, 2014 radiological release within the Waste Isolation Pilot Plant (WIPP) that resulted from the improper packaging of nitrate salt waste at LANL, extensive review of documentation and analysis of waste samples (where they could be collected) were utilized to identify containers that were conservatively characterized as D001 and D002 (where liquids were present). The criteria that identified the containers holding nitrate salt waste did not include a rigorous evaluation of the contents of the containers and was applied broadly to the characterization and labeling of all original as well as repackaged containers. Subsequent testing and re-evaluation of the waste characterized as nitrate salt waste has provided evidence that the previous characterization was unnecessarily conservative for the waste in four containers located at Waste Control Specialists in Andrew, Texas.

Waste container 68396 (WCS SWB Container 14-108586) is a pipe overpack container that holds nitrate salt process debris waste including plastic bags. Real-time radiography (RTR) video and available documentation for the waste within the container shows that the waste exhibits speckles on the plastic bags attributed to salt, glovebox horsetails and scrap metal. The waste in the container does not include absorbent. Testing completed at Southwest Research Institute (SwRI) that was conducted in support of the treatment process developed at LANL for nitrate salt waste demonstrated that the salts will not react with organic debris (e.g., plastics). Documentation associated with these tests was transmitted to the New Mexico Environment Department-Hazardous Waste Bureau as part of the submittal *Transmittal of Reports Regarding Treatment Effectiveness for Stabilization of Nitrate Salt Waste Streams* (ADESH-16-076). Characterization for waste within this container has been updated to remove the characteristic for ignitability (D001) based on this demonstration.

Waste container 93031 (WCS SWB Container 14-108699) is a 55-gallon drum that holds debris waste. RTR video shows metal cans (empty and with homogeneous solids), scrap lead, and bags. Although documentation also indicates 2 ounces of liquid was absorbed during repackaging of this waste from the original waste container, there is no granular material that can be identified within waste container 93031. It has been determined that even if it is assumed that 2 ounces of liquid were absorbed using sWheat Scoop kitty litter, that absorbed liquid would amount to less than 1% of the waste matrix in the container. Simulations run by LANS personnel to evaluate the effect of remixing of nitrate salt/sWheat Scoop kitty litter waste within a waste container (via movement of the container) concluded that the layer of material would have to be at least 4" thick to cause an entire container of remediated nitrate salt waste to have a thermal runaway reaction. This indicates that there is not enough relevant material within waste container 93031 to characterize the waste as readily capable of reaction. Characterization for waste within this container has been updated to remove the characteristic for ignitability (D001).

Waste container S855638 (WCS SWB Container 14-108696) is a 55-gallon lead lined drum with slip lid cans of cement. Documentation shows that no absorbent was added to this container and the waste within the container was not repackaged prior to shipment. RTR video and documentation indicate that there is 15 milliliters of liquid in the fold of a plastic bag. The percentage of this liquid relative to the waste is less than .01% and is not enough material to support the characterization of the waste as an oxidizer. Also, the liquid was found in the folds of the plastic and was not in contact with the waste. Characterization for waste within this container has been updated to remove the characteristic for ignitability (D001) and corrosivity (D002).

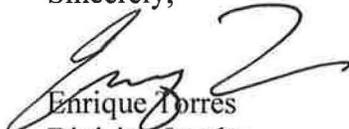
Waste container S860020 (WCS SWB Container 14-108605) is a 55-gallon lead lined drum with slip lid cans of cement. Documentation shows that no absorbent was added to this container and the waste within the container was not repackaged prior to shipment. RTR video and documentation indicated that there is 200 milliliters of liquid found in the fold of a plastic bag. The percentage of this liquid relative the cement is approximately .07% and is not enough material to support the characterization of the waste as an oxidizer. Additionally, the liquid that can be seen in the RTR video may be an overestimation. Characterization for waste within this container has been updated to remove the characteristic for ignitability (D001) and corrosivity (D002).

Mr. Ryan Williams
EPC-DO: 18-328

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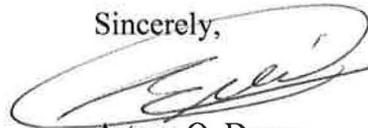
If you have any questions or would like to discuss these containers, please contact Patrick Padilla, LANS, at (505) 667-3932 or David Nickless, Environmental Management Los Alamos Field Office at (505) 665-6448.

Sincerely,



Enrique Torres
Division Leader

Sincerely,



Arturo Q. Duran
Permitting and Compliance Manager

ET/AQD/PLP/

Enclosures: None.

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