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Date: February 4, 2021
Refer To: N3B-2021-0014

Kevin Pierard
 Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6313

Subject: Supplemental Information for the Fiscal Year 2020 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit for Newport News Nuclear BWXT-Los Alamos, LLC

Dear Mr. Pierard:

Per discussions with the New Mexico Environment Department (NMED) on January 7, 2021, the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) are providing this supplemental information to clarify several items that were listed in EM-LA's/N3B's "Fiscal Year 2020 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit," Enclosure 2 of DOE's submittal to NMED on November 30, 2020 (EPC-DO-20-350). The noncompliance report was submitted in accordance with the Los Alamos National Laboratory Hazardous Waste Facility Permit (Permit) Condition (PC) 1.9.14 "Other Noncompliance." EM-LA and N3B, collectively the Permittees, provided Enclosure 2 with the utmost transparency to demonstrate to NMED that we, the Permittees, are fulfilling the Permit conditions.

All potential noncompliances identified during the 2020 NMED inspection, routine inspections, and during an independent management assessment were immediately corrected (i.e., within 24 hours) upon discovery in accordance with Permit Sections 3.2, 3.5, 3.6, and 3.7. EM-LA and N3B recognize that there are repeat labeling and operating issues identified in the annual noncompliances report (Enclosure 2 of EPC-DO-20-350). As such, N3B will be performing an extent of condition review to identify common trends in Resource Conservation and Recovery Act (RCRA) compliance issues and implementing a lean process improvement team approach, which includes mapping of waste management processes, identifying problems and causes, identifying areas of needed improvements based on causes (e.g., root causes and contributing causes), identifying immediate process changes, and piloting process changes for effectiveness.

N3B is currently

- planning training for N3B's newly revised RCRA inspection procedure, with an emphasis on issues that have been recurring in the past inspections,
- completing a rapid improvement event to determine underlying causes and potential process improvements, and
- conducting a management assessment, ASMNT-2021-0058, Proper Labeling and Secondary Containment for Containers with Liquids, which should be completed in the second quarter of fiscal year 2021. To ensure compliance with the Permit, the assessment is focusing on containers potentially containing liquids.

N3B takes the initiative to self-identify and correct potential noncompliances upon discovery (i.e., within 24 hours). However, we are a continuous-learning organization and strive to improve our processes. Each of NMED's concerns are addressed below.

1. NMED requested specific details concerning the "integrity issues" noted in the report, for example a photo or short description, including the size of the issue, as well as details of the corrective action taken to address the "integrity issues."

For containers S862389, S852977, and S855307 listed in the noncompliances report, no radiation protection or industrial hygiene issues were detected and therefore no hazardous waste spill was reported. Please see Enclosure 1, Investigation of a Waste Container with Questionable Integrity in Area G at Dome 49. All three containers were overpacked within 24 hours to ensure compliance.

The containers identified in Dome 153, Pad 6 (container numbers S862389 and S852977) on July 14, 2020, were regarded as having "integrity issues" due to peeling paint on the 55-gallon drums. No holes or heavy rust, which would indicate any leaks or spills, were noted.

The container identified in Dome 49, container number S855307, on March 25, 2020, was regarded as having "integrity issues" due to numerous pin-holes noted on the 55-gallon drums but with no visual signs of leaking (please see Enclosure 1).

2. NMED requested a complete explanation regarding drums with "conflicting" waste streams identified in the operating record (the Waste Compliance and Tracking System [WCATS]) for Domes 49, 230, and 232 as well as the process N3B has implemented or plans to implement to prevent this issue in the future.

These containers were identified during an internal management assessment completed in May 2020. All of these potential noncompliances were corrected immediately (i.e., within 24 hours) when identified. The identification of these issues is part of an ongoing effort to correct labels for updated waste streams regarding legacy drums and will be included in the continuous improvement process described above. As part of this continuous effort, the containers in question can be either reclassified (i.e., from transuranic [TRU] waste to mixed TRU [MTRU] waste or from low-level waste [LLW] to mixed LLW [MLLW]) or

reassigned profiles, which can impact the final assigned U.S. Environmental Protection Agency (EPA) codes. These issues were identified as part of the Permittees' internal management assessment program. This program facilitates the Permittees' compliance by providing a "checks and balances" process for day-to-day operations. This assessment program is in addition to the requirements outlined in PC 2.6, General Inspection Requirement, to ensure compliance with the Permit. In accordance with PC E.1.2, Actions Resulting from Inspections, all identified issues were corrected promptly (i.e., within 24 hours of discovery). These issues fall into three categories listed below.

- WCATS EPA codes (on drum labels) did not match what was identified in the operating record.
- Containers were labeled with both the "EPA Hazardous Waste" and "Non-Regulated Waste" labels.
- Containers had two waste labels.

The table below identifies the "as found" condition as reported along with the corrective action that was completed. Please note that containers identified below as "decommissioned" have been sent for disposal and are currently not in inventory. All drums with labeling issues were corrected, were in compliant storage in accordance with the reconciled EPA codes, and did not exhibit any waste material or container incompatibility issues. EPA hazardous waste codes were added based on improved acceptable knowledge (AK) reviews. N3B is further evaluating this labeling oversight issue, and other issues identified, as part of the extent of condition review and process improvement initiative.

Container ID	Location	WCATS Info	Field Notes	Corrective Action
93960	230	Decommissioned, 55-Gallon Drum; EPA Codes D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	EPA codes on labels not matching WCATS, label only noted D019	Printed new labels and applied to drum
S881198	230	55-Gallon Drum; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	EPA codes on labels not matching WCATS, label only noted D007,8,9 and F001	Printed new labels and applied to drum
LA00000068144	230	SWB; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	Double labeled with different EPA codes. Standard waste box (SWB) had 2 hazardous waste labels	Printed new labels and applied to SWB waste labels
S825046	230	110-Gallon Drum; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	EPA codes on labels not matching WCATS, label only noted D007,8,9 and F001	Printed new labels and applied to drum
S794276	230	110-Gallon Drum; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	EPA codes on labels not matching WCATS, label only noted D007,8,9 and F001	Printed new labels and applied to drum
S815097	230	85-Gallon Drum; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	EPA codes on labels not matching WCATS, label only noted D007,8,9 and F001	Printed new labels and applied to drum

Container ID	Location	WCATS Info	Field Notes	Corrective Action
W838344	232	55-Gallon Drum; MLLW - D001, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D026, D027, D028, D029, D030, D035, D036, D037, D038, D039, D040, D043, F001, F002, F004, & F005	EPA codes on labels not matching WCATS, label only noted D003	Printed new labels and applied to drum
LA00000068171	49N	Decommissioned, Hazardous/MTRU - SWB; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	SWB double labeled with "EPA Hazardous Waste" and "Non Regulated Waste"	Removed Non Regulated Waste Label
LA00000068167	49N	Decommissioned, Hazardous/MTRU - SWB; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	SWB double labeled with "EPA Hazardous Waste" and "Non Regulated Waste"	Removed Non Regulated Waste Label
LA00000068177	49N	Decommissioned, Hazardous/MTRU - SWB; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	SWB double labeled with "EPA Hazardous Waste" and "Non Regulated Waste"	Removed Non Regulated Waste Label
LA00000068154	49S	Decommissioned, Hazardous/MTRU - SWB; D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D035, D038, D039, D040, F001, F002, & F005	Double labeled with different EPA codes. SWB had 2 hazardous waste labels	Printed new labels and applied to SWB

3. NMED requested an explanation and documentation regarding the improperly labeled drums and secondary containment for drums located in Domes 49, 153, and 232 with the D002 hazardous waste code, and the volume of liquid waste. Specifically, NMED requested details concerning the root cause for improperly labeled drums and the corrective action to ensure this noncompliance does not happen in the future.

These containers were identified during the management assessment, and the labeling issues were all corrected immediately (i.e., within 24 hours) when identified. The table below contains the details for each container. The identification of these issues is part of an ongoing effort to prevent potential noncompliances and will be included in the continuous improvement process described above (including management assessment ASMNT-2021-0058 and the rapid improvement event, both in progress). For those containers identified to not have free liquids, real-time radiography (RTR) information is found in Enclosure 2 of this letter. In regard to the discrepancies in the RTR data, historical RTR information (2013/2014 timeframe) showed free liquids present in waste containers. Information scans performed in 2019 indicate there are no free liquids present in these containers. N3B is reviewing these RTR tapes and is having a secondary review performed by the Central Characterization Project to ensure compliance. These containers still require D001 and D003 waste codes (at a minimum). These codes were applied to the containers and the contents shall be treated accordingly to ensure proper remediation and characterization to meet the Waste Isolation Pilot Plant waste acceptance criteria.

Container ID	Location	Discrepancy	Liquid Identified
W822501	232	D002 not on secondary containment	No RTR located; placed on secondary containment
53832	232	D002 not on secondary containment	Yes – 40 mL of liquid at 16”- RTR Dated 4/25/2017; placed on secondary containment
LA00000068065	232	D002 not on secondary containment	No Free Liquid – RTR attached
93175	49	D002 not on secondary containment	Yes – 45 mL of liquid in folds of plastic at 11 inches – RTR dated 9/16/2019; placed on secondary containment
S833878	153	D002 not on secondary containment	No Free Liquid – RTR attached
S832412	153	D002 not on secondary containment	No Free Liquid – RTR attached

N3B and EM-LA will include more details, as necessary, for clarification in future noncompliance reports.

If you have questions, please contact Emily Day at (505) 695-4243 (emily.day@em-la.doe.gov) or M. Lee Bishop at (505) 257-7902 (lee.bishop@em.doe.gov).

Sincerely,



Joseph Murdock
Program Manager
Environment, Safety and Health
N3B-Los Alamos

Sincerely,

BRIAN HARCEK Digitally signed by BRIAN HARCEK
Date: 2021.02.03 16:05:39 -07'00'

For

M. Lee Bishop, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

Enclosure(s): One hard copy with electronic files:

1. Investigation of a Waste Container with Questionable Integrity in Area G at Dome 49, Memo CHTRU-2020-017, Dated March 25, 2020
2. LANL Info Scan Batch Data Report Container Data Sheets Dated June 20, 2019, June 26, 2019, and September 12, 2019

cc (letter and enclosure[s] emailed):

Laurie King, EPA Region 6, Dallas, TX
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Steve Yanicak, NMED-DOE-OB
Siona Briley, NMED-HWB
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PRS website

Pamela T. Maestas

From: Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>
Sent: Friday, February 5, 2021 11:02 AM
To: Pamela T. Maestas
Subject: Re: Submittal to NMED on 2/4/2021 of Supp Info FY20 Noncompliances LANL HWFP for N3B

Hello,
My apologies for responding late.
Received, thank you.

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From: Pamela T. Maestas <pamela.maestas@em-la.doe.gov>
Sent: Friday, February 5, 2021 10:58:59 AM
To: 'Martinez, Cynthia, NMENV' <cynthia.martinez1@state.nm.us>
Subject: [EXT] RE: Submittal to NMED on 2/4/2021 of Supp Info FY20 Noncompliances LANL HWFP for N3B

Hi Cynthia,
Would you please acknowledge receipt of the item listed below?
Thank you.

From: Pamela T. Maestas <pamela.maestas@em-la.doe.gov>
Sent: Thursday, February 4, 2021 8:38 AM
To: 'Pierard, Kevin, NMENV' <Kevin.Pierard@state.nm.us>
Cc: 'Dhawan, Neelam, NMENV' <neelam.dhawan@state.nm.us>; siona.briley@state.nm.us; Chris.Catechis@state.nm.us; janine.kraemer@state.nm.us; don.meyer@state.nm.us; 'Martinez, Cynthia, NMENV' <cynthia.martinez1@state.nm.us>; Emily M. Day <Emily.Day@em-la.doe.gov>; Regulatory Documentation <RegDocs@EM-LA.DOE.GOV>
Subject: Submittal to NMED on 2/4/2021 of Supp Info FY20 Noncompliances LANL HWFP for N3B

Mr. Pierard,
Attached for submittal is a pdf of the following:

- Supplemental Information for the Fiscal Year 2020 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit for Newport News Nuclear BWXT-Los Alamos, LLC (N3B-2021-0014, letter and enclosures)

Please acknowledge receipt of this submittal by responding to this email.
Let me know if you have any questions.
Thank you.

Pamela T. Maestas
Regulatory Documentation Manager
Newport News Nuclear BWXT-Los Alamos, LLC
c. 505-927-7882
regdocs@em-la.doe.gov



1200 Trinity Drive, Suite 150
Los Alamos, NM 87544

ENCLOSURE 1

**Investigation of a Waste Container
with Questionable Integrity in Area G at Dome 49,
Memo CHTRU-2020-017,
Dated March 25, 2020**



To: Randy Sandoval, ESH Manger
 From: Frank Vish, IHS Professional *FK*
 Date: March 25, 2020
 Memo No.: CHTRU-2020-017

SUBJECT: Investigation of a Waste Container with Questionable Integrity in Area G at Dome 49

Background:

On March 25, 2020, Nuclear Operators were performing RCRA (Resource Conservation and Recovery Act) inspections. They observed an 85 gallon drum with questionable integrity then, reported their observation to the TA-54 Operations Center (Ops. Ctr.). The TA-54 Ops. Ctr. made notifications to Radiation Protection (RP) and Industrial Hygiene (IH) to investigate the suspect drum. TA 54 Ops. Ctr. entered Contact-Handled Transuranic (CH-TRU)’s N3B Abnormal Operating Procedure (AOP) TRU-3004, Revision 0, Waste Container of Questionable Integrity at 11:17. Industrial Hygiene Safety (IHS) Professional requested and received a Waste Compliance and Tracking System (WCATS) report. Drum Identification: **S855307**

Method:

IHS Professional and Radiation Control Technicians (RCTs) performed an investigation of the drum. IHS Professional obtained air-monitoring measurements in the breathing zones of personnel (investigators) entering the dome as well as the immediate area around the drum. IHS Professional utilized a Photo Ionization Detector (PID) Mini-RAE 3000 Model: PGM 7320, Serial Number: 592-925967 with an 11.7 eV lamp. IHS Professional calibrated the PID with isobutylene for Volatile Organic Compounds (VOCs).

Observations / Results:

IHS Professional and RCT observed numerous pinholes with no visible leaking. See table 1.0 for air monitoring results below.

Table 1.0

Air Monitoring Results	breathing zones of personnel while entering the Dome	Immediate area around the drum – drum identification: S855307
	0.0 ppm. (parts per million) of VOCs	0.0 ppm. VOCs

Actions / Conclusion:

Measurements from the MiniRAE 3000 Photo Ionization Detector (PID) indicated no detectable levels of VOCs. RCTs instrumentation indicated no detectable radiological contamination. RP and IH had no additional concerns. TA 54 exited N3B AOP-TRU-3004 at 14:28. Drum was over-packed. TA-54 Ops. Ctr. released Dome 49 for normal operations.

Peer Reviewed By: Guillermo Vigil G.V.

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ENCLOSURE 2

**LANL Info Scan Batch Data Report Container Data Sheets
Dated June 20, 2019, June 26, 2019, and September 12, 2019**

LANL Info Scan Batch Data Report Container Data Sheet

Batch Number	HERTRINFOSCAN19-066		
Examination Date	6/20/2019		
Video/Audio Recorded Media Number	HERTRINFOSCAN19-066 A/B/C/D		
Procedure and Revision No.	CCP-TP-078 REV 0		
Container ID	S833878		
Container Type	85/55		
Waste Stream ID (as applicable)	NOT ON AKTSS		
Container Gross Weight	267.7		
	YES	NO	
Liner Present	X		
Liner Lid Present		X	
Vented	X		
Liner Type	LEAD LINER		
Fill Height	90		
	YES	NO	Volume
Liquid Present/Volume		X	N/A
	YES	NO	Prohibited items
Prohibited Items Present/Type		X	N/A
Summary Category Group	S3000		
Type of homogenous material if present	CEMENTED		
	YES	NO	
Appears to contain Nitrate Salt material		X	
Matches the AKTSS Waste Stream	NOT ON AKTSS		
Packaging Material	Estimated Weight		
Steel (ST)	64.7		
Plastic Packaging (PP)	2		
Other	23		
Total packaging Weight	89.7		
Container Inventory	Estimated Weight		Inventory
Iron-based Metal/Alloys (IM)	12		METAL CANS WITH MATERIALS, SCRAP METAL
Aluminum-based Metals/Alloys (AM)			
Other Metals (OM)			
Other Inorganic Materials (OI)			
Cellulosics (C)			
Rubber (R)			
Plastics (waste materials) (XPM)	4		PLASTIC BAGS
Organic Matrix (OR)			
Inorganic Matrix (IN)	162		HOMOGENEOUS SOLIDS
Soils (S)			
Total WMP Weight	178		
Operator	Kalene Burnside		
	Name/Signature/Date		

LANL Info Scan Batch Data Report Container Data Sheet

Batch Number	HERTRINFOSCAN19-069		
Examination Date	6/26/2019		
Video/Audio Recorded Media Number	HERTRINFOSCAN19-069 A/B/C/D		
Procedure and Revision No.	CCP-TP-078 REV. 0		
Container ID	S832412		
Container Type	85/55		
Waste Stream ID (as applicable)	Not on AKTSS		
Container Gross Weight	164.5		
	YES	NO	
Liner Present		X	
Liner Lid Present		X	
Vented			
Liner Type	N/A		
Fill Height	85		
	YES	NO	Volume
Liquid Present/Volume		X	N/A
	YES	NO	Prohibited items
Prohibited Items Present/Type		X	N/A
Summary Category Group	S3000		
Type of homogenous material if present	Absorbed		
	YES	NO	
Appears to contain Nitrate Salt material		X	
Matches the AKTSS Waste Stream	Not on AKTSS		
Packaging Material	Estimated Weight		
Steel (ST)	64.7		
Plastic Packaging (PP)	0		
Other	0		
Total packaging Weight	64.7		
Container Inventory	Estimated Weight		Inventory
Iron-based Metal/Alloys (IM)	8		Metal cans with material
Aluminum-based Metals/Alloys (AM)			
Other Metals (OM)			
Other Inorganic Materials (OI)			
Cellulosics (C)			
Rubber (R)			
Plastics (waste materials) (XPM)	4		Plastic sheeting
Organic Matrix (OR)			
Inorganic Matrix (IN)	87.8		Homogeneous solids
Soils (S)			
Total WMP Weight	99.8		
Operator	KALENE BURNSIDE		
	Name/Signature/Date		

LANL Info Scan Batch Data Report Container Data Sheet

Batch Number	HERTRINFOSCAN19-082		
Examination Date	9/12/2019		
Video/Audio Recorded Media Number	HERTRINFOSCAN19-082 A&B, C&D		
Procedure and Revision No.	CCP-TP-078 REV. 0		
Container ID	68065		
Container Type	85/55		
Waste Stream ID (as applicable)	Not on AKTSS		
Container Gross Weight	295		
	YES	NO	
Liner Present	X		
Liner Lid Present		X	
Vented	X		
Liner Type	Lead Lined		
Fill Height	80		
	YES	NO	Volume
Liquid Present/Volume		X	N/A
	YES	NO	Prohibited items
Prohibited Items Present/Type		X	N/A
Summary Category Group	S3000		
Type of homogenous material if present	Cemented		
	YES	NO	
Appears to contain Nitrate Salt material		X	
Matches the AKTSS Waste Stream	Not on AKTSS		
Packaging Material	Estimated Weight		
Steel (ST)	64.7		
Plastic Packaging (PP)	0		
Other	23		
Total packaging Weight	87.7		
Container Inventory	Estimated Weight		Inventory
Iron-based Metal/Alloys (IM)	12		Metal cans with materials
Aluminum-based Metals/Alloys (AM)			
Other Metals (OM)			
Other Inorganic Materials (OI)			
Cellulosics (C)			
Rubber (R)			
Plastics (waste materials) (XPM)	4		Plastic bag, plastic sheeting
Organic Matrix (OR)			
Inorganic Matrix (IN)	191.3		Homogeneous solids
Soils (S)			
Total WMP Weight	207.3		
Operator	Kalene Burnside		
	Name/Signature/Date		

