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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAR 31 2006

06-AMCP-0179

Ms. Jane Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

RECEIVED
APR 06 2006
EDMC

Dear Ms. Hedges:

RESPONSE TO THE ACTIONS REQUESTED BY STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY (ECOLOGY) LETTER DATED NOVEMBER 4, 2005,
"DANGEROUS WASTE COMPLIANCE INSPECTION OF CONTAINER MANAGEMENT
AT T-PLANT AND CENTRAL WASTE COMPLEX"

- References:
- (1) RL ltr. to J. Hedges, Ecology, from M. S. McCormick, "Response to Resolution 1a of State of Washington Department of Ecology (Ecology) Letter Dated November 4, 2004, 'Dangerous Waste Compliance Inspection of Container Management at T-Plant and Central Waste Complex,'" 06-AMCP-0143, dtd. March 14, 2006.
 - (2) RL ltr., to M. A. Wilson, Ecology, from K. A. Klein, "Request for Extension on Response to 'Dangerous Waste Compliance Inspection of Container Waste Management at T Plant and Central Waste Complex,' Dated November 4, 2005," 06-AMCP-0060, dtd. November 28, 2005.
 - (3) Ecology ltr. to K. Klein, RL, R. Gallagher, FHI, and R. Wilde, DFSH, from B. Wilson, "Dangerous Waste Compliance Inspection of Container Waste Management at T-Plant and Central Waste Complex," dtd. November 4, 2005.

The purpose of this letter is to respond with the remaining resolutions requested by Ecology in Reference 3. The Ecology letter requested that the resolution information be provided by January 6, 2006. After discussions with Ecology, an extension to March 31, 2006, was agreed upon and documented in Reference 2. The response to resolution 1a was previously provided by Reference 1. The responses to the remaining resolutions, 1b and 2, are provided by this transmittal.

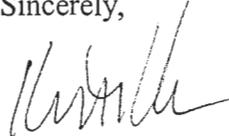
Ms. Jane Hedges
06-AMCP-0179

-2-

MAR 31 2006

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein
Manager

AMCP: GLS

Attachment

cc w/attach:

G. Bohnee, NPT

N. Ceto, EPA

R. R. Connolly, FHI

L. J. Cusack, Ecology

L. Fritz, FHI

S. Harris, CTUIR

R. Jim, YN

T. M. Martin, HAB

K. Niles, ODOE

D. Singleton, Ecology

R. Skinnerland, Ecology

B. Wilson, Ecology

Administrative Record

Environmental Portal

ATTACHMENT

Action Requested by Ecology on November 4, 2005
Resolution items 1.b. and 2

RESOLUTION 1.b.(bullets 1 through 6):

A summary of all undesignated or incompletely designated waste remaining in above-ground storage within the T-Plant, CWC, and Waste Receiving and Processing facility located in the 200 West Area of Hanford excluding wastes retrieved from the Low Level Burial Grounds per HFFACO Milestone M-91. Waste designation is the identity of all applicable state and federal waste codes determined through the processes described in WAC 173-303-070 through 100. This summary should:

- Identify these undesignated or incompletely designated wastes.
- Give the location of all these wastes.
- Identify the generator of these wastes.
- Describe the known physical and chemical composition of these wastes.
- List the waste codes applied to these wastes.
- Identify the source of documented information or data regarding the chemical and physical composition for these wastes.

Response to resolution item 1.b, bullets 1 through 6:

Waste in storage at T Plant, CWC, and WRAP was properly designated in accordance with the regulations and waste acceptance requirements at the time of receipt. However, more recent activities conducted to complete the final disposition of the waste container (e.g., Non-Destructive Examination [NDE], documentation review, etc.) can result in the identification of discrepancies. The most common are inconsistent inventories, and/or the presence of liquids not identified in the original contents. In some cases, these discrepancies could require a change in the management and/or final designation of the waste container. Table 1 (attached) provides FHI's response to the actions required in the first six bullets of resolution item 1.b. This table lists discrepant containers currently in storage at T Plant, CWC, and WRAP requiring further evaluation of the contents to determine if designation changes are required.

This table consists primarily of those containers awaiting resolution resulting from: 1) verification required as part of the Waste Analysis Plan and/or Administrative Order #1671, or 2) visual examination as part of the WIPP certification process. This list does not include waste containers retrieved from the Low Level Burial Grounds per HFFACO Milestone M-91.

RESOLUTION 1.b. (bullet 7)

- Describe how these wastes will be managed to meet the requirements of WAC 173-303-300 (General Waste Analysis) and WAC 173-303-070 (Designation of Dangerous Waste).

Response to resolution item 1.b (bullet 7):

Based upon discussions between Ecology, RL, and FHI on 3/6/06, it was agreed that the response to this item would be combined with the response to item 2. (Refer to resolution item 2).

RESOLUTION 2:

To clarify, Ecology's Administrative Order #1671 requires that non-TRU mixed waste that has not previously been confirmed to conform to the generator's description of his waste (confirmed per WAC 173-303-300) must be subjected to waste confirmation when transferred from one Hanford facility to another. The waste confirmation process per WAC 173-303-300 is commonly referred to as verification. This requirement applies to all non-TRU or non-M-91 waste stored in Hanford facilities, regardless of where the waste was generated. Ecology expects that the knowledge gained from individual waste container verifications will then be applied to the rest of the waste stream of which the verified waste is a part. Knowledge used to meet waste verification requirements must meet the requirements of WAC 173-303-300 (General Waste Analysis) and WAC 173-303-040 (Knowledge).

Determinations whether additional containers from a waste stream need to be examined to complete verification may be made by RL and its contractors on a documented case-by-case basis. However, Ecology expects that significant deviations from a waste stream's description, such as observations that may affect waste designation or the discovery of unknown or unexpected waste forms, must be remedied within 90 days of discovery. Also, in the event that a waste container fails verification due to any significant deviation from the waste stream's description, such as discovery of undesignated or unknown waste forms or substantial deviation from the generator's description of its waste, Ecology expects the entire waste stream of which the failed container is a part will be reviewed to determine whether additional containers from the waste stream require verification. If relying on process knowledge rather than physical testing of the waste to complete waste verification, that knowledge must meet the requirements of WAC 173-303-300 (General Waste Analysis) and WAC 173-303-040 (Knowledge). Where process knowledge does not meet these standards testing of the waste, including sampling and analysis if necessary, will be required.

Response to resolution item 1.b. (bullet 7) and 2:

As a point of clarification, there is a difference between the Treatment, Storage, and/or Disposal (TSD) unit waste analysis plans (WAP) for the Solid Waste Operations

Complex (SWOC) and Ecology's November 4, 2005, letter on use of the word "verification." SWOC includes the following four TSD units: CWC, WRAP, T Plant and LLBG. The TSD unit WAPs for SWOC defines verification (Section 2.2) as a subset of confirmation (Section 2.0). The November 4, 2005 letter states: "The waste confirmation process per WAC 173-303-300 is commonly referred to as verification." DOE and FHI will continue to use the term "verification" as described in the SWOC TSD unit WAPs, consistent with Administrative Order #1671

Initial Identification/Management of Discrepant Containers

During discussions with Ecology, RL, and FHI on 3/6/06, Ecology clarified their intent of the term "significant deviations" to mean an anomaly identified that could change the management of the waste in storage. The concern is how FHI manages containers when a discrepancy is identified, and then how knowledge gained to resolve the discrepancy is, or is not, applied to other containers within that waste stream. To respond to these concerns, FHI has provided a summary of the process used when these types of discrepant containers are identified.

When a discrepancy is identified in a waste container, initial actions are completed to appropriately manage the waste at the storage location until the final evaluation can be completed. These actions can include contacting the generator (if available) to determine if additional information exists to support the discrepant condition. This can also include interviews with facility personnel or supplemental documentation (procedures, MSDS, lab analysis, etc.). If the generator no longer exists, or cannot provide information to resolve the issue, an evaluation is performed and documented. In the past, this process resulted in worst case designation of the container, but was not consistently documented on how that conclusion was reached. In an effort to ensure consistency and formalize the process, FHI will be implementing a process to document this decision process and maintaining it as part of the container file.

FHI will continue to manage the container in a safe configuration; however future application of additional worst case waste codes to signify a discrepant item will be discontinued. Waste codes can be applied if supporting knowledge is obtained and/or a waste is declared as dangerous. This will address the perception of arbitrary waste code assignment, as well as ensure that containers are managed in a safe and compliant manner at the storage location while awaiting resolution.

Resolution of Discrepant Containers and Associated Containers in the Waste Stream:

Discrepant containers are either returned to the generator for rework or dispositioned through FHI by obtaining additional knowledge or reprocessing the container to resolve the concern. It should be noted that the process used to gather additional knowledge was consistent with WAC 173-303-070(3)(c)(ii) coupled with applicable guidance prior to the January 1, 2005 Dangerous Waste Regulations rule amendment and that the current

"knowledge" requirements in WAC 173-303 do not impose any new requirements from what existed in WAC 173-303 prior to January 1, 2005.

FHI meets these knowledge requirements for dangerous waste, mixed low level waste (MLLW), and transuranic mixed waste (TRUM) through generator knowledge (procedures, MSDS, interviews, etc.), physical examination, chemical screening, and/or sample analysis. This knowledge is then used to designate the waste, and apply any additional waste codes, and/or storage requirements as necessary. Additionally, when the discrepancy identified results in a change in the management, designation, and/or future treatment of the dangerous waste or MLLW, FHI will evaluate the remaining containers in the waste stream to determine the applicability of the new knowledge to the rest of the waste stream and document the results either through the Performance Evaluation System (PES) process (if applicable) or as part of the container file for each of the affected containers.

For TRU waste, in accordance with the Waste Isolation Pilot Plant Waste Acceptance Criteria (WIPP WAC), the Hanford TRU Program uses either visual examination (VE) technique or radiography, separately or together, on 100% of all TRU containers to confirm the Acceptable Knowledge (AK). For those containers that are found to contain a WIPP non-compliant or prohibited item, the container will be sent for remediation at a SWOC facility to become compliant with the CH WIPP WAC. A discrepant container does not necessarily impact other containers in the associated waste stream as 100% of the containers must be confirmed to match the AK.

Timeliness of Disposition of Discrepant Containers:

In reference 3, Ecology identifies an expectation that problems are to be remedied within 90 days. A 90-day discrepancy resolution requirement is not found in WAC 173-303, the Hanford Facility RCRA Permit, Administrative Order #1671, or other past compliance inspection issue resolution agreements between DOE and Ecology. Discrepancies identified during container management activities at T Plant, CWC and WRAP will meet the requirements of WAC 173-303-370(4) and (5), and Hanford Facility RCRA Permit condition II.P.3, as applicable, based on the type of waste transfer.

When a discrepancy is associated with information that might affect the management of the waste in storage, FHI will resolve the discrepancy as soon as practical or the container will be isolated and managed in a worst case fashion to ensure safe management of the waste. When a discrepancy will not affect the management of the waste in storage, the discrepancy will be resolved on a schedule determined by operations management. As identified on the attached Table, FHI has already completed disposition of some of the containers identified during the Ecology inspection and has a schedule to work off the discrepant containers in backlog. As new containers are identified, they will be batched based on the processing required (e.g., liquids requiring sampling and/or stabilization) and scheduled through our production control organization based upon risks, priority, and funding.

**TABLE 1 - RESPONSE TO RESOLUTION 1b
(Ecology Letter Dated 11/4/05)**

Container Status as of 3/20/06

Package ID	Location	Generator	Physical Composition	Chemical Composition	Initial Waste Codes	Source of Data - GK (Generator Knowledge)	Additional Information	Disposition/Actions Pending	Estimated Schedule
BP-188024	CWC	PNL	Debris	Non Regulated	D001,D002	GK - SDAR 2-1B-2H-4/ Inventory	NDE identified aerosol can	Confirm and disposition prohibited item.	Disposition per WIPP Schedule
BP189050	CWC	PNL	Neutralized Non-regulated liquids, solidified	Non Regulated	None	GK - TRU Waste Storage Record	NDE identified aerosol can	Confirm and disposition prohibited item.	Disposition per WIPP Schedule
BP-190021	CWC	PNL	Debris	Non Regulated	None	GK - SDAR 15-1B-2A-1	NDE identified aerosol can	Confirm and disposition prohibited item.	Disposition per WIPP Schedule
BWHC-327-SN144*	T PLANT	327	Debris	Non Regulated	None	GK - Waste Profile	Failed Verification - Liquids - D002 added	Remove and/or disposition liquid	FY 06 - 3rd Qtr
PNL-186003	CWC	PNL	Absorbed neutralized solutions inside containers	Non Regulated	None	GK - Solid Waste Storage Record/ Inventory	NDE identified >1" liquid, container >4 liters	Remove and/or disposition liquid	Disposition per WIPP Schedule
PNL-186034	CWC	PNL	Absorbed, Neutralized solutions & Debris	Non Regulated	None	GK - SDAR 2-1B-2H-2/ Inventory	NDE identified >1" liquid - D001 & D002 added	Remove and/or disposition liquid	Disposition per WIPP Schedule
PNL-187009	CWC	PNL	Debris	Non Regulated	None	GK - SDAR 2-1B-2H-2/ Inventory	NDE identified aerosol can	Confirm and disposition prohibited item.	Disposition per WIPP Schedule
RHZ-103-A14318	WRAP	PFP	Metal Debris	RCRA Metals	D008	GK - Waste Package/ Inventory	NDE identified liquid - D002 added	Remove and/or disposition liquid	FY 07 planning
RHZ-212-A21512	CWC	PFP	Debris	Organics/Inorganics	None	GK - Waste Package/ Inventory	NDE identified light bulbs - D008 added	Confirm and disposition prohibited items.	FY 06 - 4th Qtr
RHZ-212-A22203	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	Verification Failure - 12 ml of containerized liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-212-A22336	WRAP	PFP	Debris	Non Regulated	None	GK - Inventory	Verification Failure - Lead glove and 9 ml of containerized liquid. D001,D002 & D008 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-212-A22713	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	NDE identified liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-212-A22794	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	Verification Failure - 15 ml of liquid.	Remove and/or disposition liquid	Disposition per WIPP Schedule

TABLE 1 - RESPONSE TO RESOLUTION 1b
(Ecology Letter Dated 11/4/05)

Container Status as of 3/20/06

Package ID	Location	Generator	Physical Composition	Chemical Composition	Initial Waste Codes	Source of Data - GK (Generator Knowledge)	Additional Information	Disposition/Actions Pending	Estimated Schedule
RHZ-213-A17471	WRAP	PFP	Metal Debris	RCRA Metals	D008	GK - Waste Package/ Designation	NDE identified liquid	Remove and/or disposition liquid	FY 07 planning
RHZ-218-A21064	CWC	PFP	Debris	Organics/Inorganics	None	GK - Waste Package/Inventory	NDE identified lead shot and lead seals - D008 added	Confirm and disposition prohibited items.	FY 07 planning
RHZ-220-A19377	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	NDE identified liquid non-RCRA empty. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-220-A20856	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	NDE identified 0.5 oz of liquid in tubing. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-220-A20941	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	NDE identified 2 oz of liquid in tubing.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-220-A21285	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record	NDE identified leaded glove pieces and 0.5 oz liquid.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-220-A21379	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	NDE identified mercury thermometer and liquid. D001, D002 and D009 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
RHZ-231-A19642	WRAP	PFP	Debris	Non Regulated	None	GK - TRU Waste Storage Record/ Inventory	NDE identified 20 ml of containerized liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
WH87047	CWC	WHC	Absorbed water & pump oil & associated debris	Non Regulated	None	GK - TRU Storage Record/Inventory	NDE identified >1" liquid at 32"	Remove and/or disposition liquid	Disposition per WIPP Schedule
0000604	WRAP	PNL	Debris	Non Regulated	None	GK - Waste Profile/ Characterization	Failed verification - Containerized liquid, dense powder.	Remove and/or disposition liquid. Confirm and disposition prohibited item.	FY 06 - 3rd Qtr
0000835	WRAP	PNL	Debris	Non Regulated	None	GK - Waste Designation	Failed verification - Light bulbs & scale weights - D008 added	Confirm and disposition prohibited items.	FY 06 - 4th Qtr
0002834	WRAP	ERC	Sample Waste, Organic Debris	Organics	F001-F005, P029,P030,P098.P106, P120,U123,U133,U210	GK - Waste Profile	Failed verification (9903313) - Containerized liquid. Overpacked into 0002834	Remove and/or disposition liquid	FY 06 - 4th Qtr
0005482*	T PLANT	BHI	Misc. Sample Waste	Non Regulated	None	GK - Waste Profile	Passed verification - Accompanied failed verification containers	Awaiting compaction for MW Trench PSI requirement	COMPLETE FY 07 planning for compaction
0007032*	T PLANT	PFP	Debris	WA State Only Organics	WP02	GK - Waste Package/ Designation	Failed verification - Containerized liquid. - D002 added	Liquid in poly container was found and stabilized after chem screen yielded no positive hits.	COMPLETE FY 06 - 2nd Qtr
0008063	WRAP	PFP	Debris	Non Regulated	None	GK - Waste Profile/ Inventory	NDE identified >1" liquid - D001 & D002 added	Remove and/or disposition liquid	Disposition per WIPP Schedule

TABLE 1 - RESPONSE TO RESOLUTION 1b
(Ecology Letter Dated 11/4/05)

Container Status as of 3/20/06

Package ID	Location	Generator	Physical Composition	Chemical Composition	Initial Waste Codes	Source of Data - GK (Generator Knowledge)	Additional Information	Disposition/Actions Pending	Estimated Schedule
0008087	WRAP	PNL	Debris	Non Regulated	None	GK - Waste Designation	Failed verification - Two (2) thermometers with suspect mercury	Confirm and disposition prohibited items.	FY 06 - 4th Qtr
0009182*	T PLANT	PNL	Organic Debris	Organics/ Metals	D007	GK - Waste Package/Inventory	Failed verification - Suspect Lead and liquid in pump housing - D002 added	Prohibited items were removed and repackaged into containers 0027966, 0027967 & 0028057 for proper management.	COMPLETE FY 06 - 2nd Qtr
0009274	WRAP	PNL	Debris	Non Regulated	None	GK - Waste Profile/ Inventory	Failed verification - Possible mercury thermometer - D009 added	Confirm and disposition prohibited item.	FY 06 - 3rd Qtr
0013176	WRAP	PNL	Debris	Organics	D008 - F001 - F005	GK - Waste Profile/ Characterization	Failed verification - Liquid	Remove and/or disposition liquid	FY 06 - 4th Qtr
0014053	CWC	PNL	Debris	Non Regulated	None	GK - Waste Package/ Inventory	Failed verification - Lead gloves, scale weights, containerized liquid	Confirm and disposition prohibited items.	FY 06 - 3rd Qtr
0014598*	T PLANT	CP	Mercury Contaminated Metal	RCRA Metals	D009	GK - Waste Profile/ Analysis	Failed verification - Liquid - D002 added	Remove and/or disposition liquid	FY 06 - 4th Qtr
0017645	CWC	PNL	Debris	Non Regulated	None	GK - Waste Package/ Inventory	Failed verification - Containerized liquid	Remove and/or disposition liquid	FY 06 - 3rd Qtr
0018176	WRAP	PFP	A-labs waste	RCRA Metals	D008	GK - Waste Profile/ Characterization	Failed verification - Liquid	Remove and/or disposition liquid	FY 06 - 4th Qtr
0020298	WRAP	PFP	D&D Debris	Non Regulated	None	GK - Waste Profile/ Inventory	Failed verification - Suspect light bulb	Confirm and disposition prohibited item.	FY 06 - 4th Qtr
0020748	WRAP	PFP	D&D Debris	Organics & LLW debris	None	GK - Waste Package/ Inventory	Failed verification - Liquid in aerosol can - D001, D002 added	Remove and/or disposition liquid. Confirm and disposition prohibited item.	FY 06 - 4th Qtr
0020759	WRAP	PFP	Debris	Non Regulated	None	GK - Waste Profile/ Inventory	Failed verification - Liquid in 1 lt container - D002 added	Remove and/or disposition liquid	FY 06 - 4th Qtr
0020761	WRAP	PFP	D&D Debris	RCRA Metals	D007	GK - Waste Profile	Failed verification - Containerized liquid - D002 added	Remove and/or disposition liquid	FY 06 - 3rd Qtr
0020763	WRAP	PFP	D&D Debris	RCRA Metals	D007	GK - Waste Profile/Designation	Failed verification - 1000 ml free liquid in plastic folds	Remove and/or disposition liquid	FY 06 - 4th Qtr
0020827	CWC	PFP	Debris	Non Regulated	None	GK - Waste Profile	NDE identified >1" liquid, NDE identified 150 ml of containerized liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
0020831	WRAP	PFP	Debris	Non Regulated	None	GK - Waste Profile/ Inventory	Failed verification - Inconsistent inventory and free liquid (10 mils)	Remove and/or disposition liquid. Confirm and disposition prohibited item.	FY 06 - 4th Qtr
0021784	WRAP	PNL	Debris	Non Regulated	None	GK - Waste Profile	Failed verification - Containerized liquid	Remove and/or disposition liquid	FY 06 - 4th Qtr

**TABLE 1 - RESPONSE TO RESOLUTION 1b
(Ecology Letter Dated 11/4/05)**

Container Status as of 3/20/06

Package ID	Location	Generator	Physical Composition	Chemical Composition	Initial Waste Codes	Source of Data - GK (Generator Knowledge)	Additional Information	Disposition/Actions Pending	Estimated Schedule
0022034	WRAP	PNL	Debris	Non Regulated	None	GK - Waste Profile	Failed verification (0017644) - Est. of two (2) gallons of free liquid, leaded gloves Overpacked 0022034.	Remove and/or disposition liquid. Confirm and disposition prohibited item.	FY 06 - 4th Qtr
0022652	WRAP	PFP	Debris	State Only Organics	WT02	GK - Profile	NDE identified 200 ml containerized liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
0022658	WRAP	PFP	D&D Debris	RCRA Metals	D007	GK - Waste Profile	Failed verification - Two (2) gallons of free liquids - D002 added	Remove and/or disposition liquid	FY 06 - 4th Qtr
0024217	WRAP	PFP	Debris	Non Regulated	None	GK - Waste Profile	Failed verification - Containerized liquid	Remove and/or disposition liquid	FY 06 - 3rd Qtr
21969	CWC	PFP	Debris	Non Regulated.	None	GK - Solid Waste Burial Record	(Secondary PIN # Z82A-8721) NDE identified 100 ML containerized liquid, 2.5 liters free liquid. D002 added. D004, D005, D006, D007, D008, D009, D010, D019, D030 added by TRU Program	Remove and/or disposition liquid	Disposition per WIPP Schedule
221T-96-045LBL	T PLANT	TPLANT	Debris	RCRA - Debris, metals, organics, solvents	D001, D004, D009, D035, D038, F002, F003, F005, WT02, WP02	LBL files - Analysis	Paperwork Review - Request to remove debris and disposition pint bottles	Container contents were removed and re inventoried at T Plant - no liquid was observed.	COMPLETE FY 06 - 2nd Qtr
221T-96-046LBL	T PLANT	TPLANT	Debris	RCRA - Corrosive liquid, metals, solvents	D002, D004, D006, D007, D008, D009, D010, F002, F003, F005, WT02	LBL files - Analysis	Paperwork Review - Request for Reinventory of Container	Container contents were removed and re inventoried at T Plant - no liquid was observed.	COMPLETE FY 06 - 2nd Qtr
6501-7-34	WRAP	KER MCGEE	Debris	RCRA Metals/Organics	F002	GK - SWSR/Inventory	NDE identified 270 ml of containerized liquid. D002 added. D007, D008, D009, F001, F003 added by TRU Program.	Remove and/or disposition liquid	Disposition per WIPP Schedule
9400047	WRAP	PUREX	Debris	Non-RCRA Metals/Organics	WCO2	GK - TRU Waste Storage Record/ Inventory	NDE identified 1.5 oz liquid. D001 & D002 added	Remove and/or disposition liquid	Disposition per WIPP Schedule
9513581*	T PLANT	TPLANT	Debris	RCRA Debris	D004, D006, D007, D008, D009, D010, D035, D038, F002, F003, F005, WP02, WT02	LBL files - Analysis	Paperwork Review - Request for Reinventory of Container	Container contents were removed and re inventoried at T Plant - no liquid was observed.	COMPLETE FY 06 - 2nd Qtr
9522287	WRAP	PFP	Debris	RCRA Metals/Organics	None	GK - Waste Storage & Disposal Record/ Inventory	NDE identified lead gloves & 1 oz containerized liquid. D001 & D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule

**TABLE 1 - RESPONSE TO RESOLUTION 1b
(Ecology Letter Dated 11/4/05)**

Container Status as of 3/20/06

Package ID	Location	Generator	Physical Composition	Chemical Composition	Initial Waste Codes	Source of Data - GK (Generator Knowledge)	Additional Information	Disposition/Actions Pending	Estimated Schedule
9522322	WRAP	PFP	Debris	Non Regulated	None	GK - SWSDR/Inventory	NDE identified containerized liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
9601708	CWC	PNL	Debris/Dry Solids	Non Regulated	None	GK - Waste Profile/ Inventory	NDE identified prohibited item, >1" liquid	Remove and/or disposition liquid. Confirm and disposition prohibited item.	Disposition per WIPP Schedule
9601948	WRAP	PFP	Debris	Non-RCRA Metals/Organics	WCO2	GK - TRU Waste Storage Record/ Inventory	NDE identified liquid. D002 added.	Remove and/or disposition liquid	Disposition per WIPP Schedule
9607917	WRAP	PFP	Debris	Organics/Inorganics	None	GK - Waste Profile	NDE identified approx 2 Liters of liquid outside the liner - D002 added. No lead identified in NDE, D008 added by TRU Program.	Remove and/or disposition liquid	FY 06 - 4th Qtr
9702395*	T PLANT	300 LEF	Debris	Non Regulated	None	GK - Waste Profile	Failed verification - Light bulbs & liquid - D002 added	Remove and/or disposition liquid. Confirm and disposition prohibited item.	FY 06 - 3rd Qtr
9702977	WRAP	ERC	Debris	WA State Persistents	WP02	GK - Waste Profile/ Designation	Failed verification - Void >10% & light bulb	Confirm and disposition prohibited items.	FY 07 planning
9804687	CWC	PNL	Dewatered stabilized organic liquids & Lab debris	State Only Organics	WT02	GK - Waste Profile/Lab Analysis/Inventory	NDE identified >1" in internal container	Remove and/or disposition liquid	Disposition per WIPP Schedule
9900548	T PLANT	BHI	Compactable Rad Waste	Non Regulated	None	GK - Waste Profile/ Designation	Failed Verification - Containerized liquids	Liquids were removed, chem screened and dispositioned separately. Awaiting compaction to meet MW Trench PSI requirement.	COMPLETE FY 07 planning for compaction
9901867*	T PLANT	327	Debris	Non Regulated	None	GK - Waste Profile	Failed Verification - Liquids - D002 added	Remove and/or disposition liquid	FY 06 - 3rd Qtr
9903253*	T PLANT	BHI	Debris	Non Regulated	None	GK - Waste Profile/ Designation	Not selected for verification - Accompanied failed verification containers	Awaiting compaction to meet MW Trench PSI requirement	COMPLETE FY 07 planning for compaction
9903404*	T PLANT	BHI	LLW Sources	Non Regulated	None	GK - Waste Package/ Designation/ Inventory	Not selected for verification - Accompanied failed verification containers	Awaiting compaction to meet MW Trench PSI requirement	COMPLETE FY 07 planning for compaction

* Containers Identified in Ecology letter dated 11/04/05