



**Department of Energy**

Carlsbad Area Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221



**~NOTICE~**

**February 3, 2000**

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***Waste Isolation Pilot Plant  
Notification of Class 1 Permit Modifications***

The US Department of Energy (DOE) Carlsbad Area Office (CAO) and Westinghouse Government Environmental Services Company, Waste Isolation Division (WID) are notifying you of several Class 1 Permit Modifications to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Permit Number: NM4890139088-TSDF.

Class 1 permit modification notices were submitted to the New Mexico Environment Department. The following is a summary of the changes made with each notification.

November 10, 1999

Twenty-two changes were made regarding general permit provisions. Included in this number, were:

1. Six changes to the Resource Conservation and Recovery Act (RCRA) Contingency Plan. The changes defined current roles of the First Line Initial Response Team (FLIRT), updated the list of emergency coordinators and properly identified parties that have a Memorandum of Understanding with the Department of Energy (DOE). Other affected changes to the Contingency Plan reflected revised descriptions of the site evacuation alarm, current building configuration, and clarified the location of fire hydrants and post-indicator valves.
2. Fourteen changes were made that clarified various text in the permit regarding waste characterization methods, quality assurance objectives and data validation techniques for waste characterization sampling and analytical methods. Editorial and minor changes were made to inspection schedules, checklists, and firefighting procedures to reflect more current practices. A change was made to clarify the operational practices in the disposal rooms.
3. One change was made to correct a typographical error.
4. One change was made to incorporate language allowing for equipment upgrades.

Three changes were made in the RCRA training program which included:

1. Revised course descriptions and qualification cards.
2. Updated RCRA job descriptions.



3. Added a new RCRA position to allow for additional support in non-emergency response situations.

November 15, 1999

Three changes were made regarding general permit provisions. These changes included:

1. One editorial change was made to clarify the process of waste characterization sampling.
2. One minor change to revise the language in the permit regarding quality assurance objectives and data validation for waste characterization sampling and analytical methods.
3. One editorial change was made to clarify the language that describes the use of filter vents and direct loading of the waste into 10-drum overpacks and 85-gallon drums.

One Change was made to the RCRA Training program. This change included:

1. Revision of course descriptions and qualifications cards to reflect current processes.

November 30, 1999

Five changes were made to the permit regarding general permit provisions. These changes include the following:

1. One change was made to the document control process. This item established the document control process in the Quality Assurance Program Document to control changes to WAP related procedures. This change replaced the use of the nonconformance and corrective action process, which were not designed to control document changes.
2. One change was made to reflect current organizational structure.
3. One change was made regarding the information required on sample labels and tags. This change provides consistency with other sample labeling and tagging requirements within the permit.
4. One change updated the Pre-operation Underground TRU Mixed Waste Disposal Area Inspection form.
5. One change corrected two typographical errors detected in footnote definitions of

"Program Required Detection Limit" and "Program Required Quantitation Limit".

One change was made in the RCRA training program:

1. Additional site-specific training and 2-year re-qualification requirements were established for Fourier Transform Infrared Spectroscopy (FTIRS), specialized equipment used for head space gas sampling and analysis, operators and technical supervisors.

January 7, 2000

Two changes were made regarding general permit provisions which include:

1. One change was made to more clearly define requirements for the visual examination of newly generated waste as opposed to its application to retrievably stored waste.
2. One change provides consistency within the permit regarding the quality assurance and quality control criteria for the metals analysis of solid samples.

January 25, 2000

Six changes were made regarding general permit provisions. Included in this number were:

1. Editorial changes were made to ensure consistency of the permit condition with the regulations, revise names of WIPP Waste Information System (WWIS) reports to agree with the software, and update several Facility Operations Log Sheets.
2. Changes were made to modify figures in the permit depicting the addition of a shelter for the salt hauling trucks and the relocation of a fence to allow maneuvering room behind the Waste Handling Building for trucks delivering and removing TRUPACT-IIs.

Two changes were made to analytical quality assurance/control plan in order to conform with agency guidance or regulations. The changes included:

1. Changes were made in order to eliminate an inconsistency between the permit and a requirement of the Environmental Protection Agency (EPA's) analytical method for Gas Chromatography/Electron Capture Detectors.
2. Changes were made in the use of custody seals on samples ensuring consistency with other portions of the permit and with standard laboratory practice.

One change was made to the Contingency Plan as follows:

1. Change in the address for the emergency coordinator.

One change was made in the RCRA training program as follows:

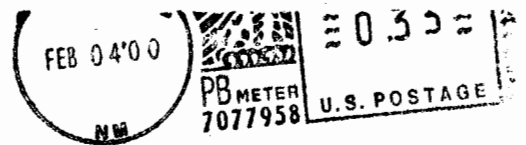
1. Change was made to update the training course numbering system to reflect the new century.

One additional change was submitted with the request that the New Mexico Environmental Department (NMED) classify it as a Class I Modification. This change allows the determination of the Volatile Organic Compound (VOC) emission rate on a disposal room basis instead of a container basis.]

Questions about this notification should be directed to Ms. Cynthia Zvonar at (505) 234-7495, or sent by Email to [zvonarc@wipp.carlsbad.nm.us](mailto:zvonarc@wipp.carlsbad.nm.us). Complete copies of the permit modification notices submitted to the New Mexico Environment Department may be:

- located on the world wide web by accessing the WIPP home page at <http://www.wipp.carlsbad.nm.us/wipp.htm>, selecting "Information" and then "Hazardous Waste Disposal (RCRA) Permit Documents"
- reviewed at the WIPP Information Center: 4021 National Parks Highway, Carlsbad, New Mexico, 88220, or
- requested from the WIPP Information Center by calling 1 (800) 336-9477.

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