

**Environmental Protection Agency Region 6/Waste Isolation Pilot Plant
PCB Disposal Authorization
Meeting Summary**

Date: May 9, 2000
Time: 10:00 AM
Location: EPA Region 6, Dallas, TX

Attendees:

Steve Gilrein: Associate Director, RCRA
David Neleigh: RCRA Permits New Mexico/Federal Facilities Section
Jim Sales: TSCA Permitting, RCRA Permits Oklahoma/Texas Section
Bill Gallagher: RCRA Permits Oklahoma/Texas Section
Nick Stone: WIPP Project Officer, New Mexico/Federal Facilities Section
Mark Hanson: Toxics Enforcement Section
Jody Plum: RCRA Compliance Manager, DOE/Carlsbad Area Office
Ralph Gruebel: Performance Assessment Engineer, DOE/Carlsbad Area Office
Wille Most: Team Leader, RCRA Permitting, Westinghouse
Lou Roberts: Toxics Enforcement Section

The NMED-HRMB participated by conference line. James Bearzi, Steve Zappe, and John Kieling were in attendance.

10:00 Introductions
10:20 EPA TSCA Process
11:00 WIPP PCB Information
Quantities of Current PCB Containing TRU and TRU Mixed Waste Inventory
Estimated Future PCB Containing TRU and TRU Mixed Waste Generation
PCB Waste Forms
Waste Characterization Process
WAC Envelope
WIPP's Equivalency with Technical Standards for Chemical Waste Landfill
Disposal of PCBs
11:30 Questions & Answers
12:00 Lunch
1:30 Discussion on asbestos contaminated TRU waste. Consensus there was no technical issue. Participants agreed to discuss acceptance of asbestos with Counsel.
2:00 Adjourn

Steve Gilrein welcomed everyone and thanked DOE for making the trip to Dallas. Steve emphasized that Region 6 would process the application in a timely manner and that EPA, the NMED, and DOE must be sensitive to public participation in the process.

Jim Sales gave a brief overview of the PCB Approval process. Ralph Gruebal made the DOE presentation on the PCB waste and DOE's strategy for PCB approval.

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Lou Roberts asked if PCB approval was necessary in light of the 1998 Mega Rule. Lou suggested that most PCB contaminated TRU waste would fit in the remediation category. It may be possible to dispose of remediation TRU waste with PCB contamination without a PCB Approval because the facility has a RCRA permit. PCB articles are also part of the inventory. PCB articles would require decontamination before disposal. Jody Plum agreed to meet with Lou Roberts the next day to discuss how DOE can pursue PCB contaminated waste under the Mega Rule provisions. The other participants expressed interest in this alternative while expressing concern over legal definitions such as “date of waste generation” and “landfill.”

Action Items:

- 1) DOE will research the PCB inventory and collect data from the generator sites to ensure the sites are consistent with PCB regulations.
- 2) Region 6 will work with DOE and NMED to develop a regulatory determination, using the Mega Rule and the PCB regulations, that clarifies DOE’s options with disposal of PCB contaminated TRU waste.
- 3) DOE intends to complete its research into the PCB waste inventory and generator site PCB compliance by July 7, 2000. DOE will contact Region 6 and identify the type of PCB waste in the inventory and identify which portion of the inventory meets the regulatory requirements.

United States Environmental Protection Agency

Region 6

Multimedia Planning and Permitting Division (6PD)

1445 Ross Avenue, Suite 1200

Dallas, Texas 75202-2733



FAX FORM

Numbers of Pages, including cover sheet: _____

To:	From: Nick Stone
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Remarks:

ZARPE Bearj.

17 pages total

REGION 6 PCB APPROVAL PROCESS (SHORT VERSION)

by

Jim Sales, Envr. Engr.

1. (Usually in practice) Facility notifies EPA of intention to submit an application. EPA visits site to gather and provide information on whether the facility is approvable, and if so, what items need to be included in the application.

(For the WIPP, a salt repository is an approvable "land disposal facility")

2. Application must cover the 8 criteria for a "PCB landfill", any waiver requests along with a justification, plus additional information related to things such as: storage, record keeping, safety, logistics, handling, staging, demographics, "risk", related State and local permit and/or legal issues, financial assurance mechanisms for closure/pos-closure, emergency response, spill cleanup/illegal disposal, modifications to approval or the site, capacity issues, construction issues, and anything else I can think of.

(These things are discussed during the initial site visit)

3. Facility submits application: usually 30 days for response to review. If I did a good job at the site visit, usually no additional information is required. But, sometimes things come up.

4. Any additional information provided as result of review, and then EPA (that's me mostly) drafts "Proposed Approval" if everything goes well. Proposed Approval reviewed by facility, and then, after Mr. Gilrein signs off, it goes to Public Notice for 45-day comment period "during which time requests may be made for Public Hearing". NOTE: EPA policy is to require PN on all approvals for commercial storage and/or "fixed site disposal

facilities". EPA decided decree this by policy, not rule making.

5. At end of comment period, responses are gauged by "significant, or substantial" criteria. If either is yes, the Director (that's Carl Edlund), gets to call a Hearing. That mean another 30-day advance notice of time and place in the local area.

6. At the end of all this is Final Decision which could result in modifications to the proposal, the application and the proposal, or denial.

7. Also, approval is not required for construction. Construction of storage and/or disposal areas can proceed at any time; you just can't commercially store or dispose until approval is given.

8. Construction of new disposal areas according to a plan proposed in the application may require an "as built" visit.

9. Copies of approvals are sent to R6 Enforcement and HQ for publication and scheduling for inspections.

EPA Region 6

NMIED

WIPP

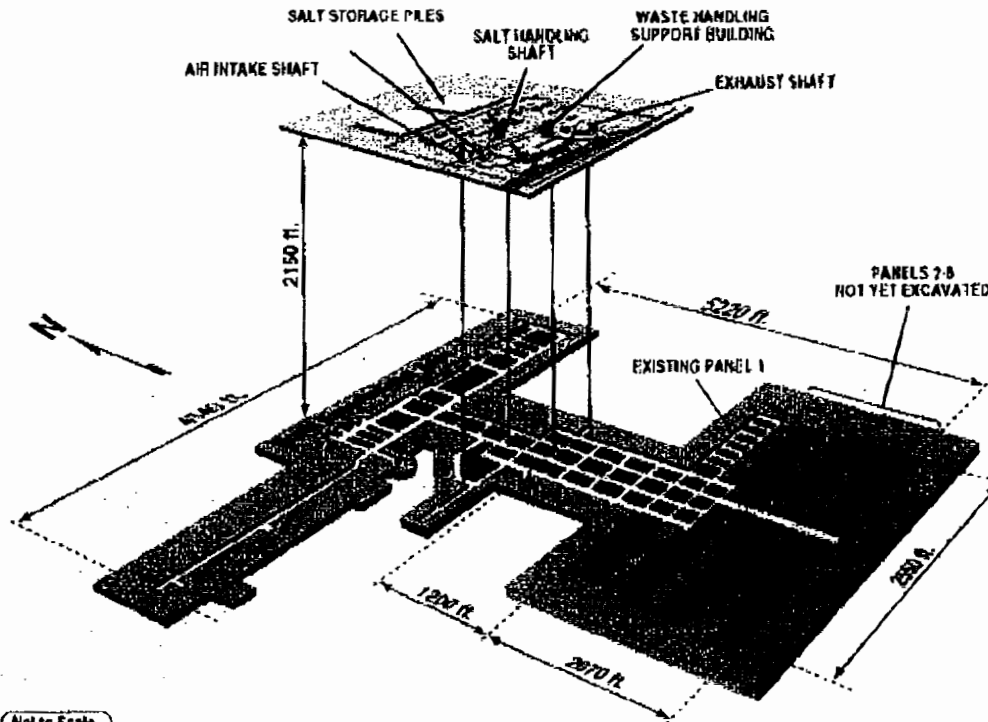
PCB Disposal Authorization

May 9, 2000

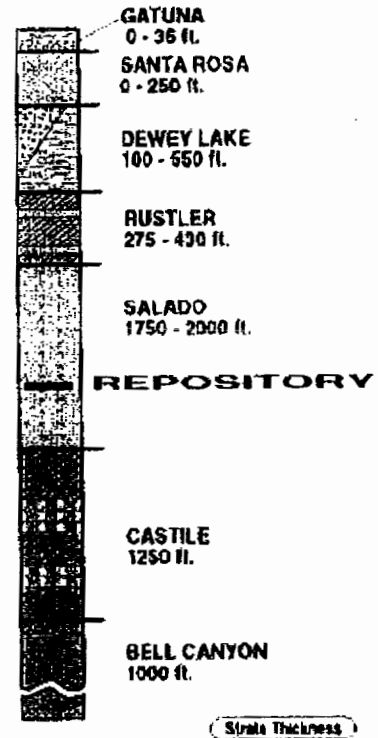
Dallas, Texas

The Waste Isolation Pilot Plant

WIPP Facility and Stratigraphic Sequence



Not to Scale



WIPP Authorization Basis Changes

■ EPA Compliance Certification

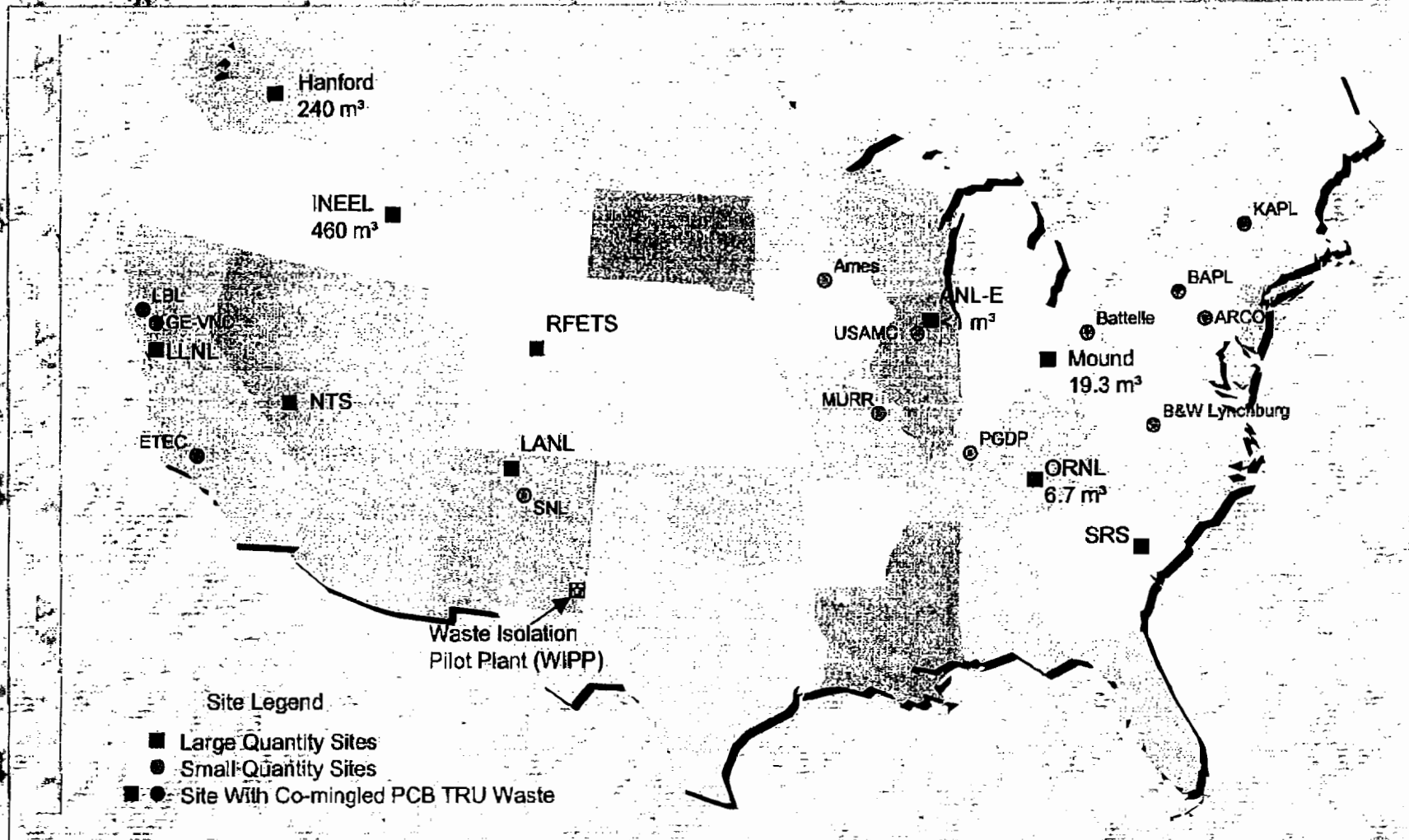
Must be changed to remove prohibition of PCB disposal, in concentrations ≥ 50 ppm, from the Waste Acceptance Criteria (WAC)

■ WIPP Hazardous Waste Facility Permit

(RCRA) Must be changed to remove prohibition of PCB disposal, in concentrations ≥ 50 ppm.

■ SEIS-II (NEPA) Must be amended to evaluate impact of disposing of PCBs at WIPP.

Generator Sites



PCB Containing TRU and Mixed TRU Waste Information

**Estimated 725 m³ PCB waste inventory
(Approximately 1,400 drums)**

**Waste Quantities will increase with facility
decommissioning & demolition.**

PCB concentrations up to 100% PCB

Various PCB Waste Forms (Debris & Soils)

Authorization Objectives

Assume PCB concentrations are ≥ 500 ppm to eliminate PCB characterization based on WIPP's containment capability.

Link Facility configuration and processes to the RCRA Permit and allow them to change in accordance with RCRA permit modifications.

Quantities of PCB Waste

Hanford

- Stored: 63.4m³
- Projected: 124.2m³

INEEL

- Stored: 461.4m³
- None Projected

Mound

- Stored: 19m³
- None Projected

PCB Waste Forms

Hanford

uncategorized metal, lead/cadmium metal
solidified organics

INEEL

inorganic non-metals, solidified organics

Mound

debris

Waste Characterization Process (Current)

**Waste Characterization at Generator Sites
Characterization by Acceptable Knowledge
(AK)**

Headspace Gas Measurement

**Confirm by RTR, Visual Examination and
Solids Sampling and Analysis**

Site Certification Process (Current)

Site Audit and Surveillance (DOE, EPA,
and NMED)

Site audit report approved by NMED

Program Certified on Waste Matrix Code
Groups

Shipped based on approved WSPF and
submittal of container specific data to the
WWIS

WAC Envelope Summary

Hazardous Waste limited to WIPP Permit

Residual Liquids < 1%

No sealed containers > 4 liters

No incompatible chemicals or materials

100% headspace gas sampling

No explosives, corrosives, or compressed gases

WAC Envelope Summary

Packaging requirements

≤ 200 -mrem at surface of payload container

≤ 2 -mrem at 10 m

> 100 -nCi of alpha emitting TRU per gram of waste

$< 1\%$ radionuclide pyrophorics

< 40 Watts limit per TRUPACT-II

Data Package content requirements

PCB Disposal Technical Basis

WIPP Meets or exceeds containment requirements for Chemical Waste Landfill

40 CFR 194 Compliance Certification

SEIS-II

NPDES Pollution Prevention Plan