TASK PRIORITIES

3rd Quarter, CY 2000

➢ Litigation issues - Complete April 20, 2000 Permit modifications before stay expires. (NMED expects to have completed by August 8, 2000)

➢ Complete LANL Audit. - (NMED attendance by week of August 21, 2000)

➢ Permit modifications:

◆ Reword previous Class 1 permit modifications to accommodate NMED comments. – Submittal July 20, 2000.

◆ Revise leak check requirements for headspace gas sampling summa canisters and manifold systems. -- Submittal July 20, 2000.

◆ Class 2 modification request for construction and operation of waste characterization facility at WIPP, including combining data validation at the project and Permittee level and modification of the Audit Program for on-site characterization. Submittal July 21, 2000.

◆ Modify operating permit to allow composite sampling (Class 1). – Submittal July 20, 2000.

◆ Obtain authorization for PCB waste disposal – Coordinate with EPA Region 6 on an MOA among EPA Regional Offices and EPA HQ.. – Submittal to EPA August 3, 2000.

◆ Complete all April 2000 Class 2 modifications to WIPP Operating Permit. (NMED expects completion by August 8, 2000.)

◆ Determination of administrative completeness of Class 1 modifications through January 31, 2000. (NMED expects to complete by August 8, 2000.)
• Modify the filter vent requirements, i.e., greater than one vent per container; use of room based emission rates. – Submittal August 8, 2000.


• Class 2 Permit Modification request regarding composite sampling specific to INEEL Method. – Submittal August 31, 2000.

• Miscellaneous facility related Class 1 modifications, e.g., laboratory control sample, LDR notification. – Submittal August 31, 2000.

• Revise drum age criteria using look-up tables and/or prediction factors. – Submittal August 31, 2000.

• Class 2 Modification Request – Waste Characterization at WIPP Public Meetings Carlsbad and Santa Fe. - CAO meeting, NMED Attendance August 29 and 31, 2000.

• Clarification (possible modification request) for collecting AK for waste streams with inadequate AK. - Submittal August 31, 2000.

• Modify VE requirements for high fissile gram equivalent solids. Submittal August 31, 2000.

• Obtain authorization to receive RH waste (2 modifications, one for the facility and one for the WAP). – Submittal September 15, 2000.

• Permit modification to dispose of site generated waste in WIPP. – Submittal September 15, 2000.

• Permit modification request to remove unneeded forms and procedures from the permit. – Submittal September 21, 2000.

• Modify the distinction between newly generated waste and retrievably stored waste as the basis for determining characterization processes. – Submittal September 30, 2000.
4th Quarter, CY 2000


➢ Permit modifications:

♦ Reduce radiography requirements to a statistical program for homogeneous solids and/or for certain debris waste streams such as graphite molds. – Submittal October 31, 2000.

♦ Modify design for panel closure; determine acceptability to use Salt Saturated Concrete in place of Salado Mass Concrete. – Submittal November 5, 2000.

♦ Reprint WIPP Operating Permit as modified. – NMED action anticipated December 20, 2000.

♦ Submit Class 1 Permit Modification request for PCB Waste Disposal. – Submittal December 31, 2000.

♦ Use of phased approach based on availability/reliability of AK to minimize homogeneous waste sampling and analysis where appropriate. – Submittal December 31, 2000.

1st Quarter, CY 2001

➢ Terminate the RFI/CMS process for the 15 SWMUs and 8 AOCs. – Submittal February 15, 2001.

2nd Quarter, CY 2001

3rd Quarter, CY 2001

4th Quarter, CY 2001

➢ Flexibility in meeting RCRA training and reduction in record keeping requirements. – Submittal December 15, 2001.

➢ Modify permit requirements associated with inspections to conform with new EPA standards. – Submittal December 15, 2001.

1st Quarter, CY 2002

➢ Modify VE requirements that verify radiography of waste containers through implementation of PDP for RTR or developing an alternative verification process. – Submittal March 15, 2002.

2nd Quarter, CY 2002

3rd Quarter, CY 2002

4th Quarter, CY 2002

➢ Modify Headspace Gas Sampling requirements as the result of VOC monitoring at WIPP. – Submittal October 31, 2002.