



Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221
November 28, 2000



Mr. Steve Zappe
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044 A Galisteo St.
Santa Fe, NM 87502

RE: Annual Waste Minimization Statement

Dear Mr. Zappe:

Enclosed is a copy of the waste minimization statement required by the WIPP Hazardous Waste Facility Permit Section VII.B.1, Waste Minimization. The statement was entered into the WIPP operating record as required by 20 NMAC 4.1.500 (incorporating 40 CFR 264.73 (b)(9)). The statement was certified according to 20 NMAC 4.1.900 (incorporating 40 CFR 270.11 (d)).

If you have any questions or comments please contact Cynthia Zvonar at (505) 234-7495.

Roger A. Nelson
for

Dr. Inés R. Triay
Manager, CBFO

Sincerely,

J. L. Epstein

J. L. Epstein
General Manager, WID

Enclosure

cc: w/enclosure
Cynthia Zvonar, CBFO
M. D. Gerle, WID

CBFO:ORC:CZ:VW:00-1086:UFC:5486



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ANNUAL WASTE MINIMIZATION STATEMENT

The Waste Isolation Pilot Plant (WIPP) has a program to be in place to minimize the quantity of hazardous wastes that are generated. The purpose of this Waste Minimization Statement is to meet the intent of the Hazardous Waste Facility Permit (HWFP), Modules I.E.10.b and VII.B.1, and 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)) to certify a waste minimization program is in place at WIPP. This program is in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined to be economically practicable. In addition, the proposed method of treatment, storage, or disposal is that practicable method currently available which minimizes the present and future threat to human health and the environment. This statement will be certified in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)) and entered into the operating record as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)). The HWFP permit requires this statement for hazardous wastes generated as a result of solid waste management units or environmental monitoring activities and for wastes derived from the management of mixed Transuranic (TRU) wastes.

This annual Waste Minimization Statement is being made to cover October 1, 1999 through September 30, 2000. During this period, WIPP did not generate any of the wastes covered by this statement. However, WIPP does have a program in place to minimize the potential for future waste generation. This program includes the following elements as suggested by the HWFP:

a. Written policy that outlines goals and objectives

WP 02-EC.11, Waste Isolation Pilot Plant Pollution Prevention Program Plan, outlines several past goals and how they were met. In addition, this plan sets new goals for reducing the generation of hazardous wastes 90% and TRU mixed wastes 80% by 2005.

Activities involving solid waste management units, environmental monitoring, and TRU mixed waste handling are conducted only by highly qualified and trained individuals capable of completing these tasks with minimal errors or waste generation. These skills significantly reduce the generation of waste at the source. In addition to the high skill level, waste management staff are required to use detailed procedures.

b. Employee training and incentive programs

Every employee at WIPP receives General Employee Training (GET) including elements on waste management, pollution prevention, waste minimization, and emergency response. In addition to GET, employees involved in waste generating or handling activities receive additional training to ensure they are fully qualified to perform the tasks expected. Most of these training programs also have elements in which waste minimization is discussed.

In addition to formal training, WIPP strives to raise environmental and pollution prevention awareness with presentations to commemorate Earth Day and America Recycles Day, that include incentives given to those who participate. WIPP also publishes regular articles on waste minimization/pollution prevention in the *WIPP Today* and *TRU News* publications. Each of these individual programs is designed to increase employee awareness of their responsibilities

to the environment through pollution prevention and to encourage them to implement changes that will reduce wastes generated.

c. Source reduction and/or recycling measures implemented in the last five years

This statement does not cover all the measures put in place to reduce site generated hazardous wastes shipped off-site. However, WIPP changed the procedure on the handling of voided acidified samples generated by Environmental Monitoring to include container neutralization allowing disposal to the sanitary sewer.

d. List of capital expenditures and operating costs devoted to source reduction and recycling

There were no expenditures on the reduction or management of wastes covered in this statement. However, WIPP has implemented an overall budget of approximately \$70K per year to promote and implement pollution prevention and waste minimization activities.

e. Factors that have prevented implementation of source reduction and/or recycling

There are no factors that have prevented the implementation of our program to reduce wastes generated as a result of solid waste management units, environmental monitoring activities, or from wastes derived from the management of mixed TRU wastes.

f. Sources of information on source reduction and/or recycling received at the facility

WIPP maintains two libraries for information; one in town and one at the site. Between the two, WIPP maintains a copy of most current regulations. In addition, WIPP subscribes to over 100 periodical including: Environmental Health & Safety CFR update (Ref.), Environmental Manager's Compliance Advisor, Environmental Permitting & Regulation, Environmental Reporter- Highlights and Decision, EPA Publications, Federal Facilities Environmental Journal, Hazardous Waste News, Hazardous Waste Consultant, Inside EPA Weekly, Radwaste Magazine, RCRA Report, and Waste Management.

g. Review of additional waste minimization efforts that could be implemented at the facility.

This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. However, because the wastes covered by this statement are being sporadically generated due to unplanned event(s), training individuals on ways to prevent accidents/mistakes and properly cleanup any spills is the only way to reduce these wastes.

h. Flow chart/matrix detailing wastes produced by quantity, type, and building or area

During this period, there were no hazardous wastes generated as a result of solid waste management units, environmental monitoring activities, or from wastes derived from the management of mixed TRU wastes.

i. Demonstration of the need to use those processes that generate a hazardous waste

The processes that have the potential to generate these wastes are required by the HWFP to monitor and clean up the environment during the handling/disposal of mixed TRU wastes generated in the defense of our country.

j. Description of the waste minimization methodology employed

Due to the nature of the wastes covered by this statement being sporadically generated due to unplanned event(s), training individuals on ways to prevent accidents/mistakes and properly cleanup any spills is the only way to reduce these wastes.

k. Description of the changes in volume and toxicity of waste in comparison to previous years

Due to the nature of the wastes covered by this statement being sporadically generated due to unplanned event(s), these wastes have not been generated, and with continued training and vigilance on the part of each employee, will likely not be generated in the future.

l. Certification statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather information and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Dr. Ines R. Triay, CBFO Manager
U. S. Department of Energy

11/28/00
Date



J. L. Epstein, General Manager
Westinghouse Waste Isolation Division

11/28/00
Date