



**Department of Energy**

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

**January 31, 2001**



Mr. Steve Zappe, WIPP Project Leader  
Hazardous Materials Bureau  
New Mexico Environment Department  
2044-A Galisteo  
Santa Fe, NM 87504

RE: Notice of Modifications sent to the WIPP Facility Mailing List

The purpose of this letter is to submit copies of the following fact sheets that were recently sent to the addressees on the WIPP Facility Mailing List.

- December 8, 2000, Waste Isolation Pilot Plant, Notice of Class 1 Permit Modifications
- DOE Proposes Modification to Hazardous Waste Facility Permit, Drum Age Criteria.

The Class 1 Notification was sent to the WIPP Facility Mailing List on December 13, 2000. The Class 2 Fact Sheet was sent to the WIPP Facility Mailing List on December 14, 2000.

In addition, we have included documentation relative to placement of notices in local newspapers for the Class 2 Permit Modifications submitted to NMED on December 7, 2000. This documentation is in the form of an email from Mr. Bobby St. John dated January 30, 2001 and is enclosed for your review.

If you have any questions regarding this notice, please contact me at 234-7495.

Sincerely,



H. L. Plum

RCRA Compliance Manager

Enclosure

CBFO:ORC:HP:SJ:01-0721:UFC:5486



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Mr. Steve Zappe

-2-

cc: w/o enclosures  
J. Bearzi, NMED  
J. Kieling, NMED

Mr. Steve Zappe

-2-

cc: w/ enclosures

S. L. Campbell	452-07 (RCRA Chronology)
M. D. Gerle	952-15 (Operating Record)
R. F. Kehrman	GSA-109
L. M. Steven	GSA-210
K. Watson	GSA-225
H. Plum	GSA-224
H. Johnson	GSA-224

~NOTICE~

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*December 8, 2000*  
**Waste Isolation Pilot Plant**  
*Notification of Class 1 Permit Modifications*

The US Department of Energy (DOE) Carlsbad Field Office (CBFO) and Westinghouse Government Environmental Services Company, Waste Isolation Division (WID) are providing this summary of recent Class 1 Permit Modifications to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Permit Number: NM4890139088-TSDF as specified in Module I.B.1. Notifications of these Class 1 permit modifications have been submitted to the New Mexico Environment Department (NMED).

The following summarizes the changes made and locations within the permit that were affected.

September 14, 2000

- Update applicable underground figures to add Panel 2 and revise the underground inspection form to reflect current operations (Figures F-3, F-5, F-9, I-1, I2-1, I-6, M2-1; D1, Underground Openings Inspection Checklist)

September 21, 2000

Seventeen changes made regarding general permit provisions, including:

- Remove procedures from Attachment P and replace with functionally equivalent summaries. Full procedures are kept on file at the facility. (Affected Module/Attachment: Attachment H, L, P)
- Correct typographical errors and delete 2 figures (Affected Module/Attachment: Attachment H)
- Update Figures to reflect current operations (Affected Module/Attachment: Attachment F, G)
- Increase training requirements and add new position (Affected Module/Attachment: Attachment H1)
- Revise Attachment B to reflect more accurate data reporting (Affected Module/Attachment: Attachment B1)
- Revise Attachment G to reflect use of strobe lights (Affected Module/Attachment: Attachment G)
- Revise the Land Disposal Restriction Notification requirements to reflect regulations recently adopted by the NMED (Affected Module/Attachment: Attachment B)
- Revise tables to reflect correct accuracy limits on laboratory control samples (Affected Module/Attachment: Attachment B3)
- Update Emergency Coordinator telephone numbers (Affected Module/Attachment: Attachment F)
- Revise text to reflect recent financial assurance changes (Affected Module/Attachment: Attachment I)
- Revise Figures to reflect current facility operations (Affected Module/Attachment: Attachment G, M1)
- Revise Attachment B to reflect corrected text which was incorrectly modified in a previous Class 1 submittal (Affected Module/Attachment: Attachment B)
- Revise text to reflect inconsistencies between Class 2 submittal and NMED Permit text (Affected Module/Attachment: Attachment B1)
- Revise Attachment N to indicate the use of updated sampling method (TO-14A)-(Affected

- Module/Attachment: Attachment N)
- Update operator logs to reflect current operations. (Affected Module/Attachment: Attachment D1)
- Make changes to Module IV that were not made in the July 20, 2000 Class 1 modification submittal (Affected Module/Attachment: Module IV)
- Revise Figures to reflect the reactivation of the underground experimental area for non-waste activities (Affected Module/Attachment: Attachment F, I, M2)

#### November 1, 2000

Eleven changes made regarding general permit provisions, including:

- 1) Incorporation of the language of the Class 1 and approved Class 2 HWFP modifications; 2) Reconciliation of inconsistencies between the WAP requirements and corresponding checklist items; 3) Reorganization of the six B6 checklists into ten checklists categorized by audit function; 4) assignment of a unique identifier to each checklist element; 5) Deletion of redundant B6 checklist items; and 6) Corrections to B6 checklist references, grammar, and spelling (Affected Module/Attachment: Attachment B6)
- Allow an increase in the number of samples that can be composited from 5 to 20 (Affected Module/Attachment: Attachment B)
- Define requirements for headspace gas sampling through the filter vent hole (Affected Module/Attachment: Attachment B1)
- Incorporate requirements for establishing safety conditions for selecting containers that are visually examined as a quality control (QC) check on radiography (Affected Module/Attachment: Attachment B1)
- Correct Figures, removes one Figure that was inadvertently added in a previous modification and updates other figures to reflect the current underground facility (Affected Figures: Figures B4-1, B4-3, G-4, M1-7, M1-15, O3-1, and O3-2)
- Add updated operating logs inadvertently left out of a previous modification (Affected Module/Attachment: Attachment D1)
- Remove reference to “carbon composite” to clarify that the sampling method applies to other types of drum filters (Affected Module/Attachment: Attachment B1)
- Add some general radiography information (Affected Module/Attachment: Attachment B1)
- Correct text in Class 1 Modification submitted July 21, 2000 (Affected Module/Attachment: Attachment B3)
- Change “waste stream” to “summary category group” (Affected Module/Attachment: Attachment B)
- Update Attachment B5-2 to reflect current document revision protocols (Affected Module/Attachment: Attachment B5)

#### November 13, 2000

- Drum Age Criteria (Affected Module/Attachment: Attachment B1) (This modification was verbally disapproved by the NMED and was removed from the permit)

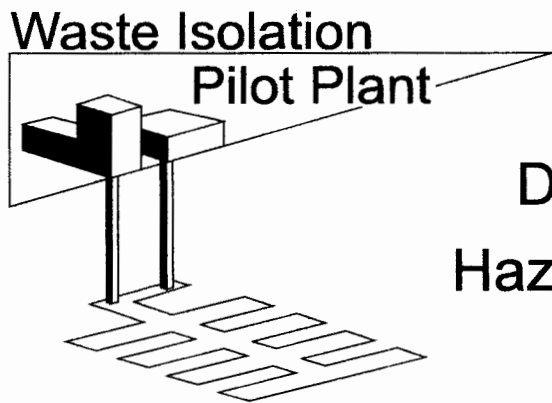
#### November 28, 2000

- Change the location of the Radiation Monitoring Equipment (Affected Module/Attachment: Attachment F)

- Remove inconsistencies in radiological survey apparatus. (Affected Module/Attachment: Attachment I3)
- Correct chemical formula (Affected Module/Attachment: Attachment N)
- Change organizational name (Affected Module/Attachment: Attachment L)
- Change Permit text and figures to more accurately reflect panel design (Affected Module/Attachment: Attachment M2)
- Update Emergency Coordinator List (Affected Module/Attachment: Attachment F)
- Revise MOU regarding emergency medical services (Affected Module/Attachment: Attachment F)
- Revision previously submitted modification (Affected Module/Attachment: Attachment B)
- Clarify determination of retention time (RT) windows and acceptance criteria for retention time for the "GC/FID" and "GC/ECD" continuing calibration. (Affected Table: Table B3-5, and Table B3-7)
- Modify Material Incident Report Form to reflect the correct responsible organization to maintain a current RCRA Contingency Plan (Affected Module/Attachment: Attachment F)

Questions about this notification should be directed to Mr. Jody Plum at (505) 234-7462, or by E-mail at [plumj@wipp.carlsbad.nm.us](mailto:plumj@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 "Document Center", then "Hazardous Waste Disposal (RCRA) Permit Documents". Copies can also be 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.

UNITED STATES DEPARTMENT OF ENERGY  
CARLSBAD FIELD OFFICE, GSA 201  
PO BOX 3090  
CARLSBAD NM 88221



## DOE Proposes Modification to Hazardous Waste Facility Permit

### ***Drum Age Criteria***

#### ***Background***

The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in support of the DOE cleanup effort.

As part of a Class 2 permit modification request, DOE proposes to modify requirements for Drum Age Criteria (DAC). The current permit does not address certain packaging configurations that are anticipated to be typical of transuranic (TRU) and mixed waste packages. The DAC determines how long a drum of waste is required to sit idle prior to headspace gas sampling being performed. This sample is required for most waste containers to be accepted at WIPP. The changes proposed to the permit take into account additional expected packaging configurations and will determine the DAC (i.e., the amount of time they are required to sit before headspace gas sampling can be accomplished).

These proposed changes, which DOE submitted to the New Mexico Environment Department (NMED) on December 7, 2000, will not adversely affect worker safety, human health, or the environment.

DOE's main priority at WIPP is to safely dispose of transuranic waste from United States defense activities in an expedient, cost-effective, and environmentally sound manner so that DOE facilities storing this waste can be cleaned up as quickly as possible. The permit requires that a headspace gas sample be obtained from each container prior to disposal at WIPP. In order to assure that these samples represent the entire container, NMED specified a minimum number of days a container must sit after packaging before it can be sampled.

In determining the DAC, consideration must be given to the "number of layers of confinement" inside a container and the rate at which the gases pass through those confinement layers. In other words, a drum containing waste that is inside three plastic bags will have a lower DAC than a drum containing waste that is inside five plastic bags.

The permit establishes that drum age must ensure that headspace gas has reached a 90 percent steady-state concentration within each layer of confinement. The DAC values in the permit were established for five layers of plastic bags as a bounding condition for debris waste and two layers for homogeneous solids and soils and gravel. The permit did not consider other specific packaging configurations that occur in TRU waste containers.

***What is  
Proposed?***

In an effort to expedite the disposal of transuranic waste in a cost-effective and environmentally sound manner and to correct inconsistencies in the DACs in the permit, the DOE proposes the following:

- **Modify the existing permit to include DAC values for specific waste packaging configurations for three different headspace gas sampling scenarios**
- **Eliminate an inconsistency within the permit when using the term “unvented rigid container greater than 4 liters”**

In all cases the 90 percent of steady-state criterion is maintained to ensure that samples are representative.

***For more  
Information***

For more information about transuranic waste shipments and procedures, or to be placed on the WIPP mailing list, call the WIPP Information Center at 1-800-336-WIPP (9477). You also may visit the WIPP Home Page at <http://www.wipp.carlsbad.nm.us>.

If you prefer, write to:



WIPP Information Center  
U.S. Department of Energy  
Carlsbad Field Office  
P.O. Box 3090  
Carlsbad, NM 88221

U.S. Department of Energy  
Carlsbad Field Office  
Waste Isolation Pilot Plant



## Public Information Meetings



### On Proposed Class 2 Modification To the Hazardous Waste Facility Permit For the Waste Isolation Pilot Plant

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**January 9, 2001**  
**6 - 8 p.m.**  
**WIPP Information Center**  
**Skeen-Whitlock Building**  
**4021 National Parks Highway**  
**Carlsbad, New Mexico**

**January 11, 2001**  
**3 - 5 p.m.**  
**6 - 8 p.m.**  
**Courtyard by Marriott**  
**3347 Cerrillos Road**  
**Santa Fe, New Mexico**

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The U.S. Department of Energy Carlsbad Field Office is hosting public meetings to:

1. Provide information to the public concerning a proposed Class 2 modification to the Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant.
2. Explain the process for submitting comments.
3. Provide a forum for an exchange of views among the public, the facility's owner (U.S. Department of Energy), the management and operating contractor (Westinghouse Waste Isolation Division), and the regulatory agency (New Mexico Environment Department).

In its request, DOE proposes to modify requirements for Drum Age Criteria (DAC). The current permit does not address certain packaging configurations that are anticipated to be typical of mixed TRU waste packages. The DAC determines how long a drum of waste is required to sit idle prior to headspace gas sampling being performed. This sample must be taken for waste to be accepted at the WIPP facility. The changes proposed to the permit will allow for different packaging configurations and will determine the amount of time they are required to sit before headspace gas sampling can be accomplished.

To obtain information about the Class 2 Permit Modification, contact Mr. Bob Kehrman at the WIPP Information Center, 1-800-336-9477. The permit modification is also available on the WIPP homepage <<http://www.wipp.carlsbad.nm.us>> and at the WIPP Information Center, Skeen-Whitlock Building, 4021 National Parks Highway, Carlsbad, New Mexico.

**You can send written comments to:**  
**Mr. Steve Zappe**  
**New Mexico Environment Department**  
**2044A Galisteo Street**  
**Santa Fe, New Mexico 87505**  
**Phone: (505) 827-2425**  
**E-mail: [steve\\_zappe@nmenv.state.nm.us](mailto:steve_zappe@nmenv.state.nm.us)**  
**Comments accepted until:**  
**February 9, 2001**

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