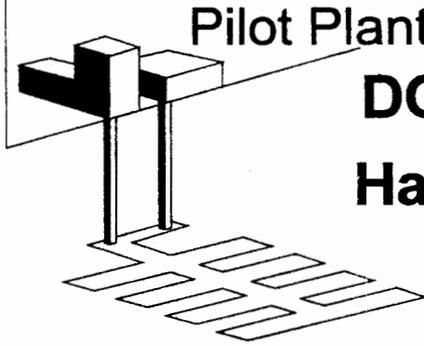


Waste Isolation

Pilot Plant



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.

The original proposed modification was submitted to the New Mexico Environment Department (NMED) December 7, 2000, and denied by NMED March 26, 2001. The revised modification request submitted to NMED May 2, 2001, will not adversely affect worker safety, human health, or the environment.

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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 anticipated to be typical of transuranic (TRU) waste packages. The DAC determine 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 to determine the approximate DAC (i.e., the amount of time the drums are required to sit before headspace gas sampling can be accomplished).

In response to stakeholder and NMED comments on the original DAC proposal, DOE has established a conservative DAC for waste containers in which packaging configurations cannot be determined. Additionally, DOE has clarified language to explain how DAC information will be recorded and to ensure waste generator/storage sites properly implement the correct DAC as they prepare waste for shipment to WIPP.

The permit requires that a headspace gas sample be obtained from each container prior to disposal at WIPP. To ensure that these samples represent

the entire container, the permit 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 lower DAC (shorter period in idle storage) than a drum containing waste inside five plastic bags. In the event the number of layers of confinement cannot be determined, more conservative DAC are used to accommodate any such drums. This modification also clarifies procedures for recording information about the DAC.

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 current 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 DAC 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.

DOE's main priority at WIPP is to safely dispose of transuranic waste from U.S. 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.

Comments

Comments may be sent to Mr. Steve Zappe, New Mexico Environment Department, 2905 Rodeo Park Drive, Building E, Santa Fe, NM, 87505. They may also be e-mailed: steve_zappe@nmenv.state.nm.us, or faxed 505-827-

1544. Only written comments will be accepted. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Steve Zappe.

**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 Web site at <http://www.wipp.carlsbad.nm.us>. If you have comments relative to this permit modification and would like them addressed by the permittees, please submit them to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221 by June 29, 2001.

If you prefer, write to:



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



Dear Mr. Zappe

How do they know the "modification request"... will not adversely affect worker safety, human health, or the environment"? Wouldn't you want documentation - some E.I.S. statement or backup information?

It sounds to me as if the camel has its nose in the tent again and probably should be kicked out.

Sincerely,
Dairde Lemkau

5-11-01