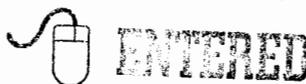
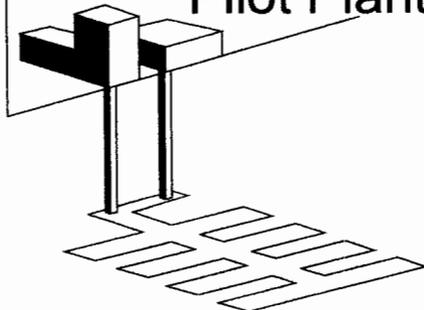


## Waste Isolation Pilot Plant



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# DOE Proposes Modification To Hazardous Waste Facility Permit *Centralized Waste Confirmation Facility*

## **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 3 permit modification request, DOE proposes to perform confirmation of waste characterization at WIPP. Waste confirmation is defined as obtaining data through testing, sampling, or analysis that confirms acceptable knowledge. The proposed changes, which DOE submitted to the New Mexico Environment Department (NMED) on June 6, 2001, will not adversely affect worker safety, public health, or the environment. NMED issued the original permit in October 1999.

The current proposed modification is a revision of a Class 2 modification request submitted to NMED on July 24, 2000, and then withdrawn by DOE on September 29, 2000. The revised modification addresses comments received during the previous comment period.

DOE's priority at WIPP is to dispose of transuranic waste from U.S. defense activities in a safe, environmentally sound and cost-effective manner, in order to expeditiously cleanup DOE facilities that store this waste.

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Currently, all transuranic (TRU) mixed waste characterization and confirmatory analyses must be performed prior to the shipment of waste to WIPP. Seventeen sites across the country store small quantities of TRU waste. DOE would incur large expenses if it were required to build waste confirmation facilities at these sites. The proposed modification would allow confirmation of characterized waste to occur at one central location, WIPP.

The proposed changes would still require waste to be characterized prior to shipment, but the confirmation process would take place at WIPP. Currently, each site undergoes a lengthy audit process and must be recertified each year.

***What is Proposed?***

DOE proposes to locate a centralized confirmation facility at WIPP. In the permit modification, DOE requests the following:

- Shipment of waste to WIPP for confirmation analysis
- Increased temporary storage capacity in the above-ground facilities at WIPP
- Increased temporary storage time in the above-ground facilities at WIPP to one calendar year
- Additional temporary above-ground waste storage areas at WIPP
- Authorization to manage prohibited items should such items be inadvertently sent to WIPP
- Elimination of redundant audits at Small Quantity Sites

**Waste Confirmation**

The permit authorizes the use of acceptable knowledge to characterize waste at the sites where it is stored. Radiography, visual examination, and headspace gas sampling and analysis are methods the permit specifies for confirming acceptable knowledge about waste.

The permit allows the use of acceptable knowledge to characterize waste at the generator sites. "Acceptable Knowledge" documents contain information regarding the nature of the waste in a waste

stream and what hazardous constituents are in the waste stream. Many waste streams have been tracked from the time they were generated and have extensive records that describe their characteristics.

The acceptable knowledge procedure is described in the proposed permit modification and will be approved by NMED through an audit.

### **Increased Storage Capacity**

DOE proposes an increase in above-ground temporary storage capacity at WIPP by 30.5 cubic meters (approximately 40 cubic yards). This increase is necessary for WIPP to continue receiving shipments while confirming waste. Waste drums would be temporarily stored above ground while awaiting confirmation. Upon confirmation, the drums would be placed underground in the repository.

### **Increased Storage Time**

Under the current permit, waste can be stored for 60 days above ground before it must be disposed of. DOE proposes increasing that time limit to one calendar year. The steps in the confirmation process dictate the need for this time frame. No waste would remain above ground longer than one calendar year from the date the manifest or bill-of-lading is signed by personnel receiving the waste at WIPP.

### **Additional Storage Areas**

Additional temporary storage space is necessary to perform the confirmation activities. All additional storage areas would be located within the Waste Handling Building, which is already permitted as a hazardous waste management unit. All additional storage areas would be clearly marked and properly managed.

### **Management of Prohibited Items**

One concern expressed by the public relates to how WIPP would deal with prohibited items at the central confirmation facility. Receipt of

prohibited items at WIPP would be unlikely; nonetheless, a clear path for managing such items has been developed. If prohibited items are identified during confirmation at the WIPP facility, these items will be managed in a safe and legal manner, which may include on-site treatment, off-site treatment and disposal, or return of the prohibited item to the shipping site. No prohibited item would remain in surface storage beyond a 10-day time limit.

***What are the Benefits?***

The benefits of the proposed modifications are numerous. It is very expensive and time consuming to provide each small quantity site with individual facilities to perform these operations. Centralizing the process at one facility will save the taxpayers millions of dollars and expedite the cleanup and closure of waste sites. It would also allow NMED greater regulatory oversight of the confirmation process.

***Comments***

Comments must 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 to 505-827-1544. Only written comments will be accepted through August 13, 2001. 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 Home Page at **<http://www.wipp.carlsbad.nm.us>**. Comments to the permittees relative to this permit modification should be submitted to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221, by August 6, 2001.

If you prefer, write to:

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

