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June 25, 2001

Mr. Steve Zappe, Project Leader (WIPP)
Hazardous Waste Permits Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive, Building 1
Santa Fe, NM 87505-6030



Subject: REVISED PAGE FOR CENTRALIZED CONFIRMATION FACILITY PERMIT
MODIFICATION REQUEST SUBMITTED ON JUNE 6, 2001

Dear Mr. Zappe:

Enclosed are revised pages 3, 8, and 9 for the Centralized Confirmation Facility (CCF) modification request. We have made minor corrections to these pages submitted to the New Mexico Environment Department on June 6, 2001. The revised wording is shown in blue highlight.

If questions arise, please contact me at your convenience. My number is (505) 234-7210.

Sincerely,

A handwritten signature in cursive script, appearing to read 'R. F. Kehrman'.

R. F. Kehrman, Manager
Requirements Management Project

DS:slc

Enclosure (1)

010613.5



and the overarching request to allow confirmation of characterized shipments of debris waste at the WIPP facility constitute the basic elements of the proposed modification.

It should be noted that the proposed modification is not limited to the small-quantity sites. For example, it may be logistically sound to allow the WIPP to assist large-quantity sites to work off their backlog of waste by providing waste confirmation services.

The scope of the proposed modification is further defined by two significant limitations:

1. The existing requirements in the HWFP for performing waste analysis, regardless of waste origin, will remain unchanged;
 2. The maximum amount of waste that will undergo confirmation analyses at the WIPP will be 1,250 cubic meters per year (equivalent to 6,000 55-gallon drums).
- 2. 20.4.1.900 NMAC (incorporating 40 CFR 270.42(c)(ii)), requires the applicant to identify that the modification is a Class 3 modification.**

The proposed modification is classified as a Class 3 permit modification per 20.4.1.900 NMAC incorporating 40 CFR 270.42(d)(1) (Other modifications).

- 3. 20.4.1.900 NMAC (incorporating 40 CFR 270.42(c)(iii)), requires the applicant to explain why the modification is needed.**

The primary purpose of centralized characterization at the WIPP is to expedite the removal of waste from, and minimize expenditures at, sites with smaller inventories of CH-TRU waste, where setting up separate characterization programs would not be practical or cost-effective (for full discussion of the rationale refer to the tab entitled "Rationale").

- 4. 20.4.1.900 NMAC (incorporating 40 CFR 270.42(c)(iv)), requires the applicant to provide the applicable information required by 40 CFR 270.13 through 270.22, 270.62, 270.63, and 270.66.**

Where applicable, regulatory citations in this modification reference Title 20, Chapter 4, Part 1, New Mexico Administrative Code (NMAC), revised June 14, 2000, incorporating the Code of Federal Regulations, Title 40 (40 CFR 264 and 270). 40 CFR 270.16 through 270.22, 270.62, 270.63 and 270.66 are not applicable at WIPP. Consequently, they are not listed below. 40 CFR 270.23 is applicable to the WIPP HWDUs. This modification does not impact the conditions associated with the HWDUs.

			Permit Location (see Table 1 for specific locations)	Yes	No
§270.14(b) (19)(ii)	§264.18(b)	100-year floodplain	Attachment O Part A Part B, Rev. 6 Chapter B, E		✓
§270.14(b) (19)(iii)		Surface waters	Attachment O Part A Part B, Rev. 6 Chapter B, E		✓
§270.14(b) (19)(iv)		Surrounding Land use	Attachment O Part A Part B, Rev. 6 Chapter B, E		✓
§270.14(b) (19)(v)		Wind rose	Attachment O Part A Part B, Rev. 6 Chapter B, E		✓
§270.14(b) (19)(viii)	§264.14(b)	Access controls	Attachment O Part A Part B, Rev. 6 Chapter B, E, F		✓
§270.14(b) (19)(ix)		Injection and withdrawal wells	Attachment O Part A Part B, Rev. 6 Chapter B, E, F		✓
§270.14(b) (19)(xi)		Drainage on flood control barriers	Part B, Rev. 6 Chapter B, E, F		✓
§270.14(b) (19)(xii)		Location of operational units	Part B, Rev. 6 Chapter B		✓
§270.14(b) (20)		Other federal laws Wild and Scenic Rivers Act National Historic Preservation Act Endangered Species Act Coastal Zone Management Act Fish and Wildlife Coordination Act Executive Orders	Part B, Rev. 6 Chapter K		✓

5. **20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1) and 40 CFR §270.30(k)) requires that any person signing under paragraph a and b must certify the document in accordance 20.4.1.900 NMAC.**

The transmittal letter with this modification request contains the signed certification statement in accordance with Module I.F of the WIPP HWFP.

6. **In addition, the applicants are providing a response to comments on the withdrawn July 21, 2000, modification request. This response is included behind the tab entitled "Comments".**