



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
**JUL 18 2001**



Mr. Steve Zappe, Project Leader (WIPP)  
New Mexico Environment Department  
2905 E. Rodeo Park Drive, Bldg. 1  
Santa Fe, NM 87505

RE: Implementation Schedule for the Class 2 Hazardous Waste Facility Permit  
Modification Requiring Addition of (trans)-1,2-Dichloroethylene and Formaldehyde  
as Target Analytes

Dear Mr. Zappe:

The purpose of this letter is to notify you of the implementation schedule for some portions of the Class 2 Permit Modification approved by the New Mexico Environment Department (NMED) on July 6, 2001. The schedule is for the NMED changes to the Class 2 Permit modification listed below that require the addition analysis of (trans)-1,2-Dichloroethylene and Formaldehyde as target analytes. The schedule is based on the NMED's July 13, 2001 issuance of the revised permit incorporating the changes:

NMED added the Savannah River Site to the footnotes requiring formaldehyde analysis on Tables B-1 and B-3 in Permit Attachment B, and on Tables B3-2 and B3-4 in Permit Attachment B3. Analysis of formaldehyde previously applied only to the Los Alamos National Laboratory (LANL).

NMED added (trans)-1,2-Dichloroethylene to the following tables:

**Permit Attachment B**

- Table B-1 (Summary of Waste Characterization Requirements: Headspace Gas, Total Volatile Organic Compounds)
- Table B-3 (Headspace Target Analyte List and Methods)
- Table B-4 (Required Organic Analyses and Test Methods: Halogenated VOCs)

**Permit Attachment B3**

- Table B3-2 (Gas VOC Target Analyte List and QAOs)
- Table B3-4 (VOC Target Analyte List and QAOs)

The above requirements cannot be implemented immediately. The following must be accomplished prior to implementing the changes listed above.



- Obtain certified standards for the respective analytes
- Test and adjust equipment
- Ensure equipment discriminates between cis and trans-1,2-Dichloroethylene
- Evaluate method detection limits (MDL) for new target analytes
- Method development
- Update procedures and plans
- CBFO review of revised plans and procedures

These activities will require up to 180 days to implement from July 13, 2001, NMED issuance of the revised permit.

The implementing schedule is listed below.

- The TRU waste generator sites currently certified by the Carlsbad Field Office (CBFO) for the characterization of TRU waste have until **January 9, 2002** to incorporate these changes into their respective programs and begin implementation.
- For samples collected prior to July 13, 2001 (headspace gas and/or VOC of S3000/4000 waste) , but not yet shipped, the TRU waste generator sites do not have to analyze for (trans)-1,2-Dichloroethylene or formaldehyde because this was not a permit requirement at the time the waste was sampled.
- For waste sampled (headspace gas and/or VOC samples of S3000/4000 waste) between July 13, 2001 and January 9, 2002 the TRU waste generator sites do not have to analyze for (trans)-1,2-Dichloroethylene or formaldehyde as long as acceptable knowledge indicates that these compounds are **not** present in the waste streams being characterized. Note that the requirement for formaldehyde analysis only applies to the Savannah River Site and LANL.
- Any waste sampled (headspace gas and/or VOC of S3000/4000 waste) after January 9, 2002 will not be accepted at WIPP unless the required (trans)-1,2-Dichloroethylene or formaldehyde (if applicable) analyses have been performed. No U122 (formaldehyde) or U079 (1,2 Dichloroethylene) waste will be accepted without the required formaldehyde (where applicable) or (trans)-1,2-dichloroethelene analysis.

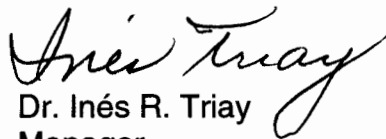
Mr. Steve Zappe

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- Upon revision of the TRU waste generator site's programs to incorporate the requirements contained in the July 13, 2001 revised permit, the sites will submit the revised documents to CBFO for review. The revised documents will be reviewed by CBFO and any comments will be provided to the sites. Implementation of the revised program will be verified during the site's next re-certification audit occurring after January 9, 2002. Sites may implement this modification before January 9, 2002 once their program is approved by the CBFO.

If you have any issues or concerns with this implementation schedule, please contact Mr. Kerry Watson at (505) 234-7357 or me at (505) 234-7300.

Sincerely,

  
Dr. Inés R. Triay  
Manager