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United States Environmental Protection Agency



Region 6

Multimedia Planning and Permitting Division (6PD)

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FAX FORM

Numbers of Pages, including cover sheet: 9

To: Steve Zappe	From: Nick Stone
Phone: 505 428 2517	Phone: (214) 665- 7226
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Remarks:

Attached is the waste unplaced/shipped that was composted. And the chronology for composting samples.

Thx
Nick



INEEL and RFETS Headspace Gas Compositing Information

The following waste streams have undergone headspace gas compositing and have been shipped to WIPP for disposal.

INEEL	RFETS
INW211.001	RF001.01
INW216.001	RF002.01
INW218.001	RF010.01
INW243.001	RF118.01
INW247.001R1	

The dates of first waste emplacement for those waste streams were:

INEEL		RFETS	
INW211.001	May 7, 2001	RF001.01	July 20, 2000*
INW216.001	June 4, 2001	RF002.01	April 12, 2000*
INW218.001	July 28, 2001	RF010.01	May 24, 2001
INW243.001	April 5, 2001	RF118.01	None emplaced
INW247.001R1	November 27, 2000		

The total number of containers emplaced by each of these waste streams is:

INEEL		RFETS	
INW211.001	154 drums	RF001.01	2000 drums
INW216.001	1312 drums	RF002.01	619 drums
INW218.001	352 drums	RF010.01	78 drums
INW243.001	112 drums	RF118.01	None
INW247.001R1	399 drums		

The total number of containers in the WIPP repository is 10,988 drums

* Containers from these waste streams were shipped to WIPP prior to the modification allowing compositing. None of the containers shipped before the modification submittal underwent compositing of headspace gas samples. An email from Mr. Eric D'Amico of RFETS is attached indicating that no compositing occurred before the modification submittal.

The number of containers at INEEL which have undergone headspace gas compositing and have not been shipped to WIPP is approximately 1500 (this number may be higher but computer malfunctions at INEEL have made updating this number impossible).

The number of containers at RFETS which have undergone headspace gas compositing and have not been shipped to WIPP is approximately 660 drums.

RFETS has thermally treated waste in pipe overpack containers. This waste stream is subject to reduced headspace gas sampling and analysis as indicated in Permit Attachment B-3a(1)(ii). A statistically selected number of samples (140 samples) were obtained as required in Permit Attachment B2-2b. The remaining pipe overpacks (approximately 7800) do not require headspace gas sampling and analysis.

Streng, Dave

From: D'Amico, Eric (Eric.D'Amico@rfets.gov)
Sent: Thursday, September 20, 2001 4:21 PM
To: 'strengd@wipp.carlsbad.nm.us'
Subject: Compositing Information

Dave,

This is to notify you that Rocky Flats has not composited headspace gas samples for any waste streams (including waste streams RF001.01, RF002.01 and RF010.01) until after the compositing technique was issued and allowed in the Class 1 permit modification.

Call me if you need additional information.

Eric D'Amico
Rocky Flats
TRU Waste Projects
103-966-5362

CHRONOLOGY REGARDING THE DEVELOPMENT OF THE COMPOSITING AND SAMPLING THROUGH THE FILTER VENT MODIFICATIONS

March 22-23, 2000 Headspace Gas Sampling Workshop, Albuquerque, NM

Dr. Rod Arbon of the Idaho National Engineering and Environmental Laboratory (INEEL) made a presentation that introduced both the concept of sampling through the filter vent and compositing headspace gas samples. This was the first time the DOE discussed these concepts with the NMED (both Steve Zappe of NMED and Connie Walker of Techlaw were in attendance at this workshop) and EPA (Barry Lesnick of EPA-OSW).

April 24-28, 2000 During INEEL certification audit

In a conference call, the topic of compositing was discussed with NMED, INEEL, CBFO, and Westinghouse. The decision was made to look at the methods to see if compositing could be justified as a Class 1 modification.

July 20, 2000 Class 1 Permit Modification submittal

In response to the recommendations from the March 22-23 Headspace Gas Workshop and the April discussions, the CBFO submits a Class 1 permit modification package that includes the implementation of compositing of up to 5 samples into a single analytical sample. This level of compositing is allowed in the EPA approved method 8260 used for analysis. (The Methods Information Communication Exchange (MICE) clarified the origin of the 5 samples in August 2001 by e-mail.)

July 25, 2000 Meeting with NMED

CBFO met with NMED to discuss permit activity. Among the items listed on the permit Task Priorities is the recently submitted Class 1 compositing modification

September 8, 2000 Generator site Round Robin Visits—RFETS

RFETS requests that CBFO pursue increasing composite size to 20 to 1.

September 11, 2000 Generator site Round Robin Visits—Hanford

Hanford requests that the CBFO proceed with authorizing the use of a gas-tight fitting for sampling.

September 12, 2000 Generator site Round Robin Visits—INEEL

INEEL requests that CBFO proceed with a permit modification to increase compositing up to 20 to 1. This was originally determined to be a Class 2 modification because the INEEL request involved compositing at the time of sampling instead of at the time of analysis. The implementation involved the use of new sampling equipment and smaller sample aliquots.

October 11, 2000 Meeting with NMED

CBFO met with NMED to discuss permit activity. Among the items listed on the permit Task Priorities is the Class 1 compositing modification submitted on July 20 and a Class 2 modification to allow compositing equipment (INEEL Method).

October 23, 2000 CBFO Status Meeting

Decision was made by CBFO to separate the compositing equipment from the 20 to 1 increase. The 20 to 1 was to be submitted as a Class 1 (extension of the agency guidance that allowed 5 to 1) and the equipment portions were to be submitted as Class 2.

October 26, 2000 Meeting with NMED

CBFO met with NMED to discuss permit activity. Among the items listed on the permit Task Priorities is the Class 1 compositing modification submitted on July 20 and a Class 2 modification to allow compositing equipment (INEEL Method).

November 1, 2000 Class 1 Permit Modification Submittal

This submittal to the NMED included 20 to 1 compositing, sampling through the filter vent hole, and VE safety requirements.

November 13, 2000 Class 1 Permit Modification Submittal

The CBFO submitted a Class 1 permit modification to change the method in which the sites determine the appropriate Drum Age Criteria for headspace gas sampling and to clarify permit text with regard to sealed 4-liter containers.

November 17, 2000 Meeting with NMED to discuss Radiography

At the end of a meeting with NMED to discuss radiography, they indicated that they had a problem with the Drum Age Criteria Modification that CBFO had submitted 4 days earlier. Discussions with NMED the following week led to them "verbally" rejecting the Class 1 modification.

December 1, 2000 Meeting with NMED

At this meeting, the CBFO suggested that the modification be broken into two separate submittals. NMED countered with the offer to quickly issue a Temporary Authorization (TA) since the problems with INEEL qualified as impacts to waste management activities, which allowed a TA to be issued as stated in the regulations. CBFO agreed.

December 7, 2000 Class 2 Permit modification submittal and request for a Temporary Authorization

The Drum age criteria modification was submitted to the NMED along with a request for a temporary authorization to perform the activities proposed in the modification.

December 12, 2000 Class 1 Permit Modification Submittal

Class 1 permit modification was submitted to provide additional changes for implementing sampling through the filter vent hole.

January 29 – February 1, 2001 RFETS Audit

Compositing at RFETS was reviewed during this audit.

March 26, 2001 NMED denial for the Drum Age Criteria Modification

In denying the Drum Age Criteria Modification, the NMED clarified their criteria for Class 2 and Class 3 modification submittals. In this letter, the NMED stated that "...if the Permittees continue to submit technically complex changes as Class 2 modifications, they run the risk of having technically deficient requests denied ..." thereby establishing "complexity" as the standard for classification.

June 11 to June 15, 2001 Hanford Audit

The NMED viewed the implementation of the sampling through the filter vent (airtight seal) modification

July 30 to August 3, 2001 INEEL Audit

During this audit, NMED indicated that they had a problem with the compositing modification. These were characterized by NMED as "unresolvable technical issues".

August 8, 2001 Meeting with NMED

At the request of the Permittees, a meeting was held with NMED to discuss the NMED concerns with the Class 1 permit modifications. The Permittees requested the opportunity to explore regulatory options available to them.

August 10, 2001 Meeting with NMED

A follow-up meeting was held with NMED to discuss regulatory options. At this meeting it was agreed that the 40 CFR 270.42(a)(3) approach was the best way to deal with achieving an expanded public review for the Class 1 modifications.

August 24, 2001 Meeting with NMED

At a second meeting with the NMED, the Permittees discussed the path forward that they were proposing for resolving the issues.

August 28, 2001 Class 2 Permit Modification Submittal and Request for Temporary Authorization

The CBFO submitted a request for the Class 1 modifications to be reviewed under 40 CFR 270.42(a)(3) using the Class 2 processes. CBFO also submitted a request for a temporary authorization to allow the activities to continue at the generator sites while the Class 2 process was underway.

August 30, 2001 TDOP Modification denial letter

The NMED issued a letter denying the volume increase in the Waste Handling Building for 10-drum overpacks that are directly loaded with waste. In this letter, the NMED clarified their criteria for Class 1 permit modifications. In this letter, the NMED establishes the *not non-substantive* change criterion for classification as a Class 1 modification.

August 31, 2001 Class 1 Modification Technical Completeness Letter

The NMED issued a letter determining the technical completeness of Class 1 modification submitted between April 2000 and March 2001. Not included was the data management modification submitted in July 2000. In this letter, the NMED addresses the compositing, sampling through the filter vent and VE safety criteria Class 1 modifications with the following words:

"The Permittees' August 29, 2001 revised submittal for a temporary authorization and application of the Class 2 process on this

previously submitted Class 1 modification is being evaluated and shall be addressed under a separate administrative action."

September 10, 2001 NMED letter to CBFO and WTS

The NMED issued a letter to establish, for the administrative record, a chronology of the events that occurred since the July 30, 2001 INEEL audit with regard to the Class 1 modifications.