Fax

To: Steve Zappe

From: Bob Herman

Fax:

Phone:

Pages (including cover sheet): 3

Re:

Comments:

Steve, after our discussions with you, we've decided to record two of the Class I - Hazardous & Incident Levels, and clarifying job descriptions. I'm in tomorrow 505 234 7462 (C) or 505 481 9034 (P). Thanks.

[Signature]

010966

A member of Washington Group International, Inc.
Mr. Steve Zappe, WIIP Project Leader  
Hazardous Waste Permits Program  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 E. Rodeo Park Dr. Bldg. 1  
Santa Fe, New Mexico 87505-6303  

RE: Class 1 Permit Modifications Dated June 28, 2001  

Dear Mr. Zappe:  

The Department of Energy (DOE) requests that two of the Class 1 modifications from our June 28, 2001 submittal, which were in question, be rescinded. These are:  

Item 1.a.2  Updated Incident Level Descriptions  
Item 1.a.3  Updated Hazard Assessment  

We have enclosed the updated Hazard Analysis as per your request.  

Additionally, we have enclosed our response to your questions regarding the following item from the June 28, 2001 submittal:  

Item 4.4.5 and 4.a.6  Updated Job Descriptions  

If further questions arise please feel free to contact Mr. Jody Plum at (505) 234-7462.  

Sincerely,  

Dr. Inés R. Triay  
Manager  

Enclosure  

cc: w/o enclosure  
C. Zvonar, CBFO  
J. Plum, CBFO  
R. Kehrman, WTS
Class 1 Modifications Dated June 28, 2001

Item 1.a.2

This modification has been withdrawn and will be re-submitted at a later date with additional details.

Item 1.a.3

This modification has been withdrawn and will be re-submitted at a later date with additional details.


Item 4.a.5

This modification was necessary to keep the permit current with staffing requirements at the WIPP facility.

This modification changed the title of Non-TRU Waste Handlers to Site Generated Waste Handlers. All non-TRU waste is site generated waste. As indicated within Attachment A-5 of the HWFP “Non-mixed hazardous wastes generated at the WIPP, through activities where contact with TRU mixed waste does not occur, are characterized, placed in containers, and stored (for periods not exceeding the limits specified in 20 NMAC 4.1.300 (incorporating 40 CFR §262.34)) until they are transported off site for treatment and/or disposal at a permitted facility. This waste generation and accumulation activity, when performed in compliance with 20 NMAC 4.1.300 (incorporating 40 Part CFR §262), is not subject to RCRA permitting requirements and, as such, is not addressed in the permit.”

The personnel dealing with site generated waste no longer have dual responsibilities and, as a consequence, all job activities are now outside the regulatory realm of the current permit. The former HWFP responsibilities of Non-TRU Waste Handlers dealt with transporation. The Waste Operations Administrative Assistant has been renamed the Transportation Engineer and the transportation related responsibilities of the Non-TRU Waste Handler have been assigned to this position. The Permit related responsibilities, education/experience and training requirements for both the Non-TRU Waste Handler and the Waste Operations Administrative Assistant have been absorbed by the transportation engineer.