

Subject: mod comments

Date: Tue, 30 Oct 2001 21:48:20 +0000

From: Deborah Reade <reade@nets.com>

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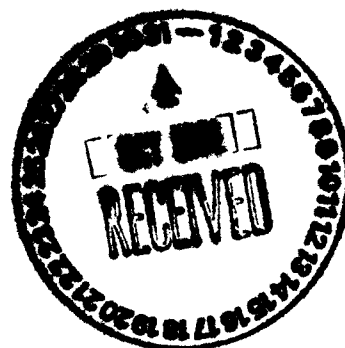
Hi Steve--

Here are CARD's comments on the last three modifications. Could you please e-mail me back that you have received them? My printer is on the fritz so I can't fax or mail you comments until it is fixed.

Thanks--Deborah

November 1, 2001

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Comments on the Department of Energy's Proposed Class 2 Modifications to the

Waste Isolation Pilot Plant Hazardous Waste Operating Permit:
USING COMPOSITE HEADSPACE GAS DATA AND COMPOSITING UP TO 20 SAMPLES,
ESTABLISHING SAFETY CONDITIONS FOR
VISUAL EXAMINATION (VE) OF WASTE CONTAINERS,
TAKING SAMPLES OF HEADSPACE GAS THROUGH EXISTING FILTER VENT HOLES

Introduction

Although CARD does not have problems with any of the proposed modifications in concept, we do have problems with and concerns about some of the methods proposed to carry out these modifications and some of their supporting documentation. Since class 2 modifications cannot be revised by the New Mexico Environment Department (NMED), we urge NMED to deny all three modifications.

Item 1: Using Composite Headspace Gas Data and Compositing up to 20 Samples

CARD has several problems with this modification as submitted. First, c.1. Section B3-1: Identification of Tentatively Identified Compounds, bullet 6 states "The reference spectra used for identifying TICs shall include, at a minimum, all of the available spectra for compounds that appear in the 20.4.1.200 NMAC (incorporating 40 CFR Part 261) Appendix VIII list. The reference spectra may be limited to VOCs when analyzing

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