



**Subject: Re: nitrogen generator**

**Date:** Wed, 30 Jan 2002 13:35:08 -0700

**From:** Steve Zappe <Steve\_Zappe@nmenv.state.nm.us>

**Organization:** NMED Hazardous Waste Bureau

**To:** "Streng, Dave" <Dave.Streng@wipp.ws>

**CC:** Steve Holmes <Steve\_Holmes@nmenv.state.nm.us>, Steve Calvert <Steven.Calvert@wipp.ws>

Dave -

Based upon our review of this proposed modification, NMED concurs that this could be incorporated into the permit as a Class 1 modification. Criteria for both nitrogen and zero air are already included under specifications for compressed gas cylinders, and equivalent criteria currently exists for a zero air generator. Adding identical criteria for a nitrogen generator would create a balance between the two methods of providing gases.

\*\*\*However\*\*\*

I am opposed to CCP implementing this change (or at least WIPP receiving waste characterized in such manner) until the revised procedure substituting the generator for the compressed cylinders has been audited and found in compliance. Obviously, there needs to be a demonstration that the nitrogen generator is capable of providing gas that contains less than 1 ppm of total VOCs before it can be used. Until and unless that demonstration is provided to the Permittees' satisfaction (through audit or surveillance), it's my opinion that such waste would not be eligible for disposal at WIPP. Approval at the upcoming CCP/ANL-E audit does not cover activities at SRS.

So, you can have your Class 1 modification, but there is a price to pay. Feel free to submit it with the ASTM Type II water modification notification.

Call or write with questions.

Steve

"Streng, Dave" wrote:

- > Steve
- >
- > The CCP at Argonne and SRS would like to use a headspace gas system equipped
- > with a nitrogen generator rather than cylinder nitrogen.
- >
- > Attachment B1, Section B1-1a(1) in the first bullet under:
- > "The standard side must consist of the following major elements" reads as
- > follows:
- > \* A cylinder of compressed zero air, helium, argon or nitrogen gas
- > that is .... Alternatively, a zero air generator may be used, provided a
- > sample of the zero air is collected and demonstrated to contain less than
- > one ppm total VOCs. Zero air from a generator shall be humidified (except
- > for use with FTIRS).
- >
- > The proposed language would be as follows:
- > \* A cylinder of compressed zero air, helium, argon or nitrogen gas
- > that is .... Alternatively, a zero air or nitrogen generator may be used,

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- > provided a sample of the zero air or nitrogen is collected and demonstrated
- > to contain less than one ppm total VOCs. Zero air or nitrogen from a
- > generator shall be humidified (except for use with FTIRS).
- >
- > We would like to submit this as a Class 1 since nitrogen is an allowable gas
- > already and none of the QC requirements (less than 1 ppm of total VOCs) will
- > be changed.
- >
- > Since this falls into the same Section as the Type II water we would simply
- > like to include it with that modification for submittal to NMED at the end
- > of this week.
- >
- > Thanks for your assistance.
- >
- > Dave Streng

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NMED Hazardous Waste Bureau