



Subject: Re: Filters on waste containers

Date: Thu, 28 Feb 2002 08:35:59 -0700

From: Steve Zappe <Steve_Zappe@nmenv.state.nm.us>

Organization: NMED Hazardous Waste Bureau

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

CC: Matthew Silva <msilva@eeg.org>, Ben Walker <BWalker@eeg.org>

BCC: Will Fetner <William_Fetner@nmenv.state.nm.us>,
Steve Holmes <Steve_Holmes@nmenv.state.nm.us>,
Phillis Stevens <Phillis_Stevens@nmenv.state.nm.us>

Dave -

Thanks for the questions. Here are my answers:

1. I understand your concern over our removal of all instances of "or body" with respect to placement of filter vents on various containers. I also believe the original August 8, 2000, Item 2 modification to allow "one or more filtered vents" to be installed on the "lid or body" was sloppy at best. Do you really intend to install more than one filter on a 55-gallon or 85-gallon drum? If so, where? If not, why the language allowing more than one? Likewise, for SWBs and TDOPs, did you ever intend to install filters on the lids? If not, why the language allowing filters on SWB or TDOP lids? This was the type of modification that inadvertently introduces more problems than it attempts to solve, and it has been particularly evident in modifications dealing with operations (i.e., consolidation of container descriptions).

I suggest you go farther than you proposed. You should consider each container separately, determine whether it is suitable for one or multiple filters, and describe where it/they are located (lid or body). Finally, refer the reader to the appropriate figure for filter placement for each container type, not just for SWBs and TDOPs.

2. I understand Matt's clarification to you regarding his comment. The October 9, 2001 EEG cover letter used the generic term "drums" in expressing their concern. However, the comment attached to their letter dealt only with 55-gallon drums, not 85-gallon overpack drums. Hence, we did a wholesale removal of the language pertaining to filters being placed "on the body" of any container. That was a mistake on my part. Thank you for pointing out that the design of SWBs and TDOPs require placement of filters on the body.

3. You are correct in pointing out my mistake in referencing the date of the modification. It should have read August 8, 2000.

4. The August 8, 2000 Class 1 notification (which contained several items) had been previously determined administratively complete on August 31, 2001, which is why it was not listed on the February 25, 2002 letter. We don't want to bill you twice for the same modification, even if we have to go back and reverse a previous decision on one of the items.

Let me know if you have any further questions. If you need a formal response to

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these questions (i.e., printed on NMED letterhead and signed), please submit them formally. Thanks!

Steve

"Streng, Dave" wrote:

> Steve
>
> Thank you for the revised permit language. We are incorporating it into the
> permit now and a new version will be on the WIPP web page by COB Monday,
> March 4, 2002.
>
> I have several questions.
>
> As you may already know I have spoken with Mr. Holmes of your office
> regarding the changes made to Item 2 of the August 8, 2000 Class 1
> notification. The changes made for the standard waste box (SWB) and
> ten-drum overpack (TDOP) are inconsistent with Figures M1-4 and M1-5 as
> shown in the current HWFP. I discussed with Mr. Holmes the possibility of
> submitting a Class 1 mod to allow filters on SWBs and TDOPs to be "as shown
> in Figures M1-4 and Mi-5 respectively". Is this acceptable to you?
>
> We have spoken with Mr. Matt Silva of EEG and he has concurred that his
> comment applied only to drums and not to SWBs or TDOPs.
>
> Regarding this same issue. Page 11 of the Administrative Completeness
> Determination dated February 25, 2002 states that the modification was dated
> August 8, 2001. I believe it should read August 8, 2000.
>
> Finally, in the letter for the Administrative Completeness Determination the
> August 8, 2000 modification was not shown as one of the bullets. Am I
> correct in assuming that it was administratively complete?
>
> Please let me know the resolution of these issues at your convenience.
>
> Thanks
>
> Dave Streng
> 505-234-7262

<p>Steve Zappe <steve_zappe@nmenv.state.nm.us> NMED Hazardous Waste Bureau</p>
