

# PUBLIC INFORMATION MEETINGS

## On Proposed Modifications to the Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant



**WHO:** U.S. Department of Energy (DOE) Carlsbad Field Office and Westinghouse TRU Solutions LLC (WTS).

**WHAT:** DOE and WTS will conduct these public information meetings to provide information on the following requested permit modifications. There will be a 60-day public comment period beginning on July 3, 2002.

**WHEN:** Tuesday, July 30, 2002

Thursday, August 1, 2002

**WHERE:** 5 - 7 p.m.

3 - 5 p.m. & 6 - 8 p.m.

Skeen-Whitlock Building  
4021 National Parks Highway  
Carlsbad, New Mexico

Courtyard by Marriott  
3347 Cerrillos Road  
Santa Fe, New Mexico

On June 28, 2002, DOE submitted the following permit modification requests to the New Mexico Environment Department (NMED):

**WHY:**

1. **Improving Data Management to Streamline the Disposal of Transuranic Waste**, which would allow sites the option of electronic review, validation, and verification to manage and approve characterization information.
2. **Characterizing Repackaged Homogenous Solids as Retrievably Stored Waste**, would clarify certain permit provisions to allow generator sites to better manage their waste characterization and confirmation programs.
3. **Use of Radiography for Newly Generated Waste**, which requests approval for the use of radiography to confirm repackaged waste in lieu of visual examination. This would provide the same information currently obtained using visual examination, while increasing the safety of employees involved in the process.
4. **Addition of HalfPACT Shipping Container**, which would allow WIPP to receive shipments in the HalfPACT shipping container, thus reducing the total number of shipments to the facility. In November 2000, the Nuclear Regulatory Commission approved the HalfPACT as a type B shipping container.
5. **Addition of a New Hazardous Waste Number**, which would allow WIPP to handle, store, and dispose of certain transuranic debris waste from the Idaho National Engineering and Environmental Laboratory.
6. **Record Keeping and Auditing for Classified Information**, seeks approval for the safe storage of waste information involving classified information. This modification proposes that records deemed classified for national security reasons be stored at a facility capable of securing the information rather than at WIPP.
7. **Addition of New Waste Containers**, would allow the use of direct-loaded Ten-Drum Overpacks and direct-loaded 85-gallon drums and 100-gallon drums. Some larger debris waste exceeds the capacity of a 55-gallon drum. The additional waste containers would aid sites in packaging waste for shipment to WIPP. The addition of the containers would not require any changes to waste handling practices currently employed at WIPP.

Items 1 and 5 have been submitted requesting that NMED determine the appropriate classification, with a recommendation that the permit modification requests be processed as Class 2. The remaining items were submitted as Class 2 permit modification requests.

**HOW:**

To obtain additional information about these permit modification requests, contact Mr. Bobby St. John, WTS at 1-800-336-9477. The permit modifications are also available on the WIPP Web site at <http://www.wipp.ws> and at the WIPP Information Center, Skeen-Whitlock Building, 4021 National Parks Highway, Carlsbad, New Mexico. The public may also obtain a copy of the requested permit modifications from NMED at the address listed below.

**COMMENTS:** Written comments for the record must be sent to the NMED contact person at the address below and received no later than 5 p.m. on September 3, 2002:

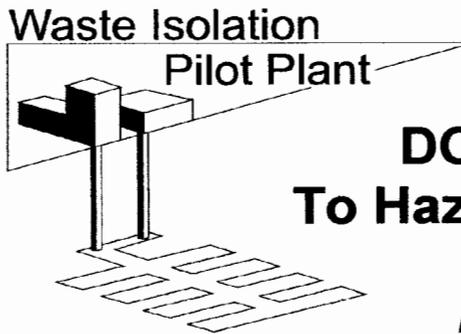
Mr. Steve Zappe  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505  
Phone: 505-428-2517  
Fax: 505-428-2567  
E-mail: [steve\\_zappe@nmenv.state.nm.us](mailto:steve_zappe@nmenv.state.nm.us)

The permittees' compliance history during the life of the permit being modified is available from Mr. Steve Zappe at the New Mexico Environment Department.

**QUESTIONS:** If you have questions or comments regarding these permit modifications and wish to have them addressed by the Permittees, they may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221, no later than August 27, 2002.

020707





Fact Sheet



## DOE Proposes Modification To Hazardous Waste Facility Permit

### *Improving Data Management to Streamline the Disposal of Transuranic Waste*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

In the permit modification request, DOE proposes to revise the method in which waste data is managed. The proposed changes, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, will not adversely affect worker safety, public health, or the environment. DOE requested that NMED determine the appropriate classification for the permit modification request, with a recommendation that the permit modification request be processed as a Class 2. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

### **What is Proposed?**

This modification request would give generator/storage sites the option to use electronic review, validation, and verification as a means to manage and release waste characterization information. All data will be reviewed by an Independent Technical Reviewer to ensure proper procedures were followed and representative samples of headspace gas, homogenous solids, and soil/gravel were taken. All proposed changes are consistent with the Environmental Protection Agency's automation and streamlining goals.

In this request DOE is also proposing to:

- (1) Eliminate the need for Waste Stream Characterization Packages. The information contained in these packages is the same information found

in the Waste Stream Profile Form and the Characterization Information Summary.

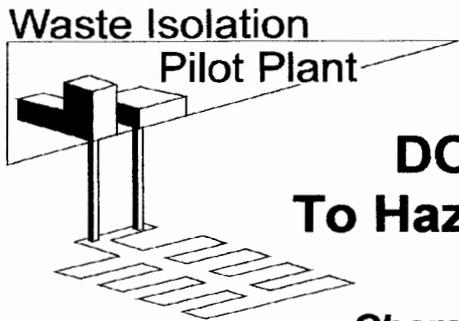
- (2) Eliminate the need for quarterly repeat of data review. This procedure can and will be accomplished through the audit and surveillance program.
- (3) Consolidate data management, including reorganization of the requirements. Currently, data management is addressed throughout the permit. This would centralize the location of this topic in one section of the permit, thus reducing the possibility of inconsistencies.
- (4) Allow the use of barcodes in lieu of sample tags or labels. The information normally found on a sample tag or label must be accessible electronically for a barcode to be used.
- (5) Keep records required by the permit either electronically or by hard copy.

**Comments**

Comments for the record must be sent to Mr. Steve Zappe, New Mexico Environment Department, 2905 Rodeo Park Drive, Building 1, Santa Fe, NM 87505. They may also be e-mailed: [steve\\_zappe@nmenv.state.nm.us](mailto:steve_zappe@nmenv.state.nm.us) or faxed to 505-428-2567. Only written comments will be accepted. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Zappe. To be placed on the WIPP mailing list, contact Mr. Zappe at the address above.

**For more  
Information**

For more information about transuranic waste shipments and procedures, call the WIPP Information Center at 1-800-336-WIPP (9477). You also may visit the WIPP Home Page at <http://www.wipp.ws>. If you wish to submit comments to the Permittees regarding this permit modification, they may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221.



Fact Sheet



## DOE Proposes Modification To Hazardous Waste Facility Permit

### *Characterizing Repackaged Homogeneous Solids as Retrievably Stored Waste*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

In the Class 2 permit modification request, DOE proposes to allow characterizing repackaged homogeneous solids as retrievably stored waste. The proposed change, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, clarifies certain permit provisions allowing generator sites options in managing their waste characterization and confirmation programs while still protecting worker safety, human health, and the environment. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

The existing permit establishes different waste characterization requirements at generator/storage sites for “newly generated waste” versus “retrievably stored waste.”

#### **Repackaged Homogeneous Solids**

Consists of solid waste materials, excluding soil/gravel, which do not meet the WIPP permit criteria for classification as debris.

#### **Retrievably Stored Waste**

Waste generated and packaged prior to notification by NMED that the final audit report and characterization requirements of the Hazardous Waste Facility Permit, Waste Analysis Plan (Attachments B-B6) had been implemented at that particular site.

#### **What is Proposed?**

There are instances when a site may want to characterize so-called “repackaged homogeneous solids” as “retrievably stored waste.” This modification will clarify the existing permit and explicitly allow sites an option to characterize repackaged homogeneous solids as retrievably stored waste using the approach set forth in section B2-2a of the existing permit to determine the number of containers to sample.

***What are the Benefits?***

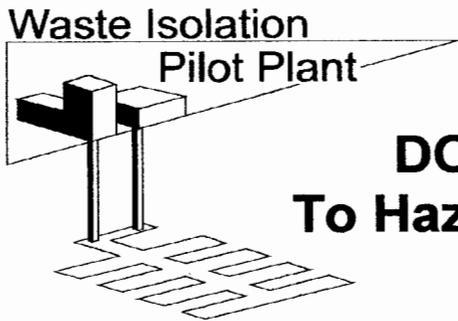
The proposed modification will clarify the permit and allow sites added flexibility in managing their characterization and confirmation programs.

***Comments***

Comments for the record must be sent to Mr. Steve Zappe, New Mexico Environment Department, 2905 Rodeo Park Drive, Building 1, Santa Fe, NM 87505. They may also be e-mailed: [steve\\_zappe@nmenv.state.nm.us](mailto:steve_zappe@nmenv.state.nm.us) or faxed to 505-428-2567. Only written comments will be accepted. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Zappe. To be placed on the WIPP mailing list contact, Mr. Zappe at the address above.

***For more Information***

For more information about transuranic waste shipments and procedures, call the WIPP Information Center at 1-800-336-WIPP (9477). You also may visit the WIPP Home Page at <http://www.wipp.ws>. If you wish to submit comments to the Permittees regarding this permit modification, they may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221.



Fact Sheet



## DOE Proposes Modification To Hazardous Waste Facility Permit

### *Use of Radiography for Newly Generated Waste*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

The existing permit establishes different waste characterization requirements at generator/storage sites for “newly generated waste” and “retrievably stored waste.”

### **What is Proposed?**

In the Class 2 permit modification request, DOE proposes to allow the use of radiography for newly generated waste. The proposed change, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, clarifies certain permit provisions allowing generator sites options in managing their waste characterization and confirmation programs. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

When generator/storage sites initially package waste or when “retrievably stored” waste must be repackaged, the permit requires that sites use the Visual Examination Technique, also referred to in the permit as *Visual Verification of Acceptable Knowledge*. There are circumstances when it is preferable (e.g., to protect worker health and safety) to do post-packaging confirmation of Acceptable Knowledge using 100 percent radiography instead of verifying Acceptable Knowledge at the time of packaging with the Visual Examination Technique. Both techniques provide the same information. The existing permit does not explicitly address this option. This modification would clarify the existing permit to allow sites the option to perform either the

Visual Examination Technique or radiography to confirm Acceptable Knowledge for newly generated waste.

***What are the Benefits?***

The proposed modification would clarify the permit and allow generator sites added flexibility in managing their characterization and confirmation programs.

***Comments***

Comments for the record must be sent to Mr. Steve Zappe, New Mexico Environment Department, 2905 Rodeo Park Drive, Building 1, Santa Fe, NM 87505. They may also be e-mailed: [steve\\_zappe@nmenv.state.nm.us](mailto:steve_zappe@nmenv.state.nm.us) or faxed to 505-428-2567. Only written comments will be accepted. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Zappe. To be placed on the WIPP mailing list, contact Mr. Zappe at the address above.

***For more Information***

For more information about transuranic waste shipments and procedures, call the WIPP Information Center at 1-800-336-WIPP (9477). You also may visit the WIPP Home Page at <http://www.wipp.ws>. If you wish to submit comments to the Permittees regarding this permit modification, they may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221.

Waste Isolation  
Pilot Plant

Fact Sheet



## DOE Proposes Modification To Hazardous Waste Facility Permit

### *Addition of HalfPACT Shipping Container*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

Currently, the TRUPACT-II is the only container used for shipping transuranic waste to WIPP. It is designed to hold up to fourteen 55-gallon drums. The U.S. Department of Transportation limits the gross weight of a shipment, including the truck and trailer, to 80,000 pounds. Some shipments of contact-handled transuranic waste to WIPP consist of 55-gallon drums weighing as much as 1,000 pounds each. The HalfPACT was developed to accommodate these heavier drums. The proposed change, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, will not adversely affect worker safety, public health, or the environment. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

### **What is Proposed?**

In the Class 2 permit modification request, DOE proposes to include the HalfPACT among containers that can be accepted at WIPP. The HalfPACT, like the TRUPACT-II, is leak-tight and constructed with inner and outer containment vessels. The HalfPACT was approved by the U.S. Nuclear Regulatory Commission on November 2, 2001, for use as a Type B container. The HalfPACT is designed to carry the heavier waste and can hold up to seven 55-gallon drums, four 85-gallon drums, or one standard waste box.

**What are the Benefits?**

It is estimated that the HalfPACT will eliminate the need for approximately 2,000 shipments to WIPP and save as much as \$67 million over the life of the project.

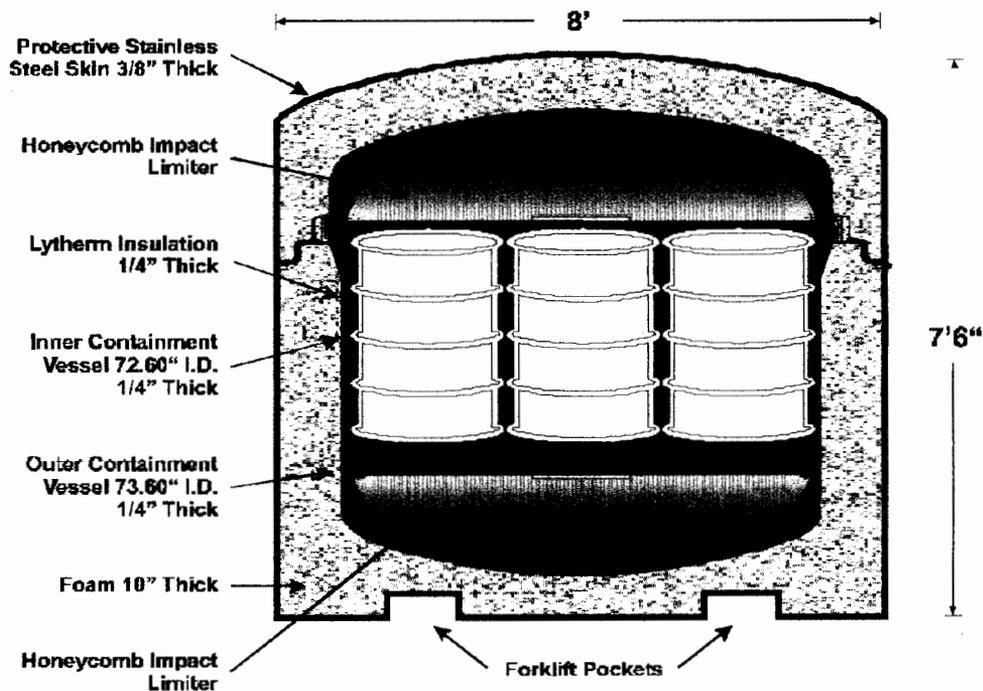
**Comments**

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**For more Information**

For more information about transuranic waste shipments and procedures, call the WIPP Information Center at 1-800-336-WIPP (9477). You also may visit the WIPP Home Page at <http://www.wipp.ws>. If you wish to submit comments to the Permittees regarding this permit modification, they may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, NM 88221.

## HalfPACT



## Waste Isolation Pilot Plant

Fact Sheet



# DOE Proposes Modification To Hazardous Waste Facility Permit

## *Addition of a New Hazardous Waste Number*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

The WIPP Hazardous Waste Facility Permit requires that treated waste retain the listed hazardous waste numbers that applied to the original untreated waste. Therefore, it is necessary to add an additional hazardous waste number to the WIPP permit. The proposed changes, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, will not adversely affect worker safety, public health, or the environment. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

### ***What is Proposed?***

In the Class 2 permit modification request, DOE is proposing to add the waste number U134, hydrofluoric acid, to the existing list of acceptable hazardous waste numbers. The additional waste number is necessary to accommodate approximately 100 cubic meters (500 drums) of transuranic debris waste located at the Idaho National Engineering and Environmental Laboratory. This waste does not contain any free liquids and does not exhibit the toxic or corrosive characteristics of hydrofluoric acid. The addition of this new waste number will not require any additional or different management practices at the WIPP facility.

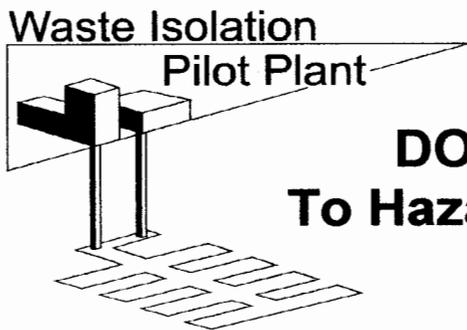
### ***Comments***

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***For more  
Information***

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Fact Sheet



## DOE Proposes Modification To Hazardous Waste Facility Permit

### *Record Keeping and Auditing Classified Information*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

Current permit conditions require that all characterization information on waste shipped to WIPP must be readily retrievable for audit purposes. Some of the waste destined for disposal at WIPP includes materials that contain "classified information." The information is classified for national security reasons. Currently, the permit requires all records regarding waste disposed of at WIPP be stored on site. DOE is proposing the records containing classified information be stored at a facility capable of ensuring the security of that information. The proposed change, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, will not adversely affect worker safety, public health, or the environment. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

**What is  
Proposed?**

In the Class 2 permit modification request, DOE is proposing that records containing classified information be held at a location designed to protect classified material, rather than at the WIPP site. Radiography tapes of waste containers may reveal classified information and must be stored at a facility approved for the storage of classified information. WIPP does not have such a facility. This change would in no way compromise the stringent requirements the waste must meet prior to being disposed of at WIPP. This information will continue to be maintained as part of the WIPP Operating Record and will be available for NMED review by individuals with appropriate

security clearances. Should one of these tapes be selected for review, the review would be performed by cleared personal at a location with appropriate security protections.

**Comments**

Comments for the record must be sent to Mr. Steve Zappe, New Mexico Environment Department, 2905 Rodeo Park Drive, Building 1, Santa Fe, NM 87505. They may also be e-mailed: [steve\\_zappe@nmenv.state.nm.us](mailto:steve_zappe@nmenv.state.nm.us) or faxed to 505-428-2567. Only written comments will be accepted. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Zappe. To be placed on the WIPP mailing list, contact Mr. Zappe at the address above.

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Information**

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## Waste Isolation Pilot Plant

Fact Sheet



# DOE Proposes Modification To Hazardous Waste Facility Permit

## *Addition of New Waste Containers*

**Background** The U.S. Department of Energy (DOE) has proposed a modification to its Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant (WIPP) in order to provide greater support to the DOE cleanup effort.

The WIPP Hazardous Waste Facility Permit requires waste to arrive at WIPP in approved containers (55-gallon drums or Standard Waste Boxes). The currently approved containers will not accommodate certain waste forms (i.e., large debris waste). For this reason DOE has proposed to modify the current permit to allow for the use of other waste containers. The proposed changes, which DOE submitted to the New Mexico Environment Department (NMED) on June 28, 2002, will not adversely affect worker safety, public health, or the environment. DOE requested that NMED determine the recommendation that the permit modification request be processed as a Class 2. NMED issued the original Hazardous Waste Facility Permit for WIPP in October 1999.

### **What is Proposed?**

In the permit modification request, DOE is requesting NMED's approval for the use of direct-loaded Ten Drum Overpacks, direct-loaded 85-Gallon Drums, and 100-Gallon Drums. Direct loading consists of placing waste into these containers rather than placing an existing container in them, which is referred to as "overpacking." The waste containers would be used to supplement the currently approved containers (55-gallon drums and Standard Waste Boxes). Some larger debris waste exceeds the capacity of a 55-gallon drum, and the additional containers would aid generator/storage sites in packaging waste for shipment to WIPP. Use of the waste containers would not require any changes to the current waste handling practices employed at the WIPP facility.

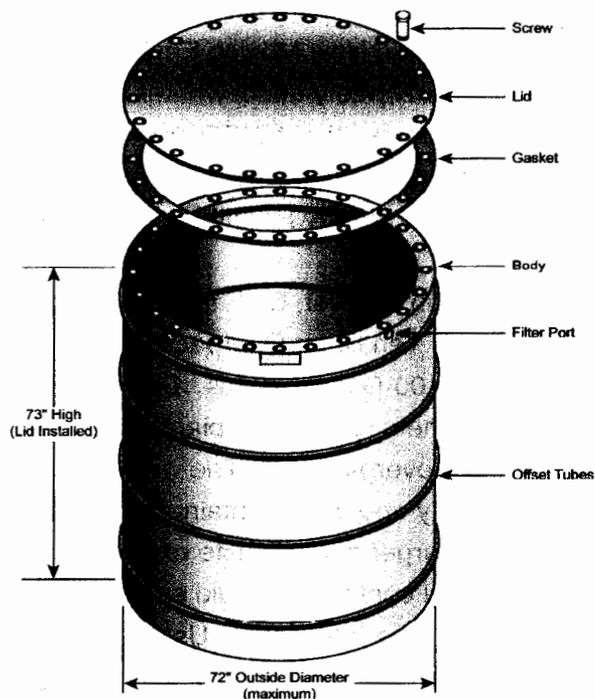
**Comments**

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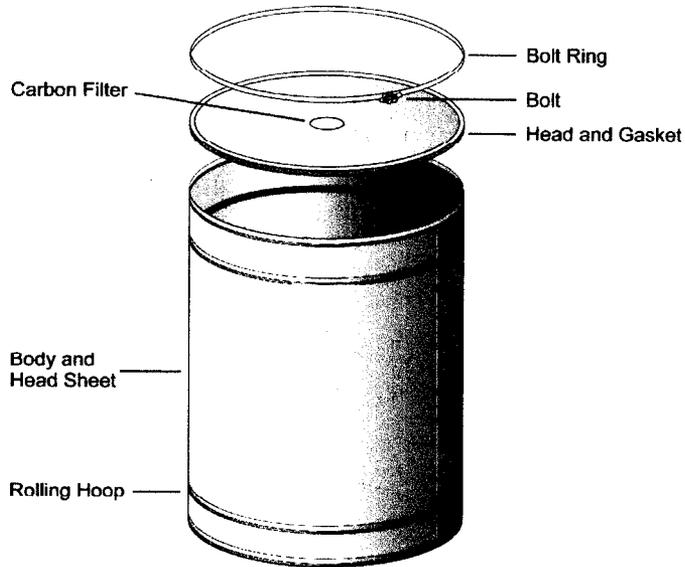
**FOR ILLUSTRATION PURPOSES ONLY**



**Ten Drum Overpack**

**FOR ILLUSTRATION PURPOSES ONLY**

### 85-Gallon Drum



### 100-Gallon Drum

