



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221



November 25, 2002

Mr. Steve Zappe, WIPP 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

2002

Subject: Annual Waste Minimization Statement

Dear Mr. Zappe:

Enclosed is a copy of the waste minimization certification required by the WIPP Hazardous Waste Facility Permit Module VII.B.1, Waste Minimization. The certification was entered into the WIPP operating record as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.73 (b) (9)). The statement was certified according to 20.4.1.900 NMAC (incorporating 40 CFR 270.11 (d)).

If you have any questions, please contact Mr. Jody Plum at (505) 234-7462.

Sincerely,

Dr. Inés R. Triay, Manager
Carlsbad Field Office

John Lee, General Manager
Westinghouse TRU Solutions

Enclosure

cc: w/enclosure
J. Plum, CBFO
S. Casey, WTS
P. Roush, WTS
L. Steven, WTS
CBFO Mailroom



ANNUAL WASTE MINIMIZATION CERTIFICATION

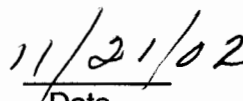
A program is in place at the Waste Isolation Pilot Plant (WIPP) to minimize the quantity of hazardous wastes that are generated. The purpose of this Waste Minimization Statement is to meet the intent of the Hazardous Waste Facility Permit (HWFP), Modules I.E. 10.b and VII.B.1, and 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)) to certify a waste minimization program is in place at WIPP. This program is in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined to be economically practicable. In addition, the proposed method of treatment, storage, or disposal is the most practical method currently available which minimizes the present and future threat to human health and the environment. A description of the WIPP Waste Minimization Program and this certification are entered into the operating record as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)). The HWFP requires this certification for hazardous wastes generated as a result of corrective action for solid waste management units or environmental monitoring activities and for wastes derived from the management of TRU-mixed wastes.

This annual Waste Minimization Certification addresses the period from October 1, 2001 through September 30, 2002. During this period, no hazardous wastes were generated as a result of solid waste management unit or environmental monitoring activities at WIPP. One 55-gallon drum of non-hazardous waste and two liters of mixed waste were derived from the management of TRU wastes.

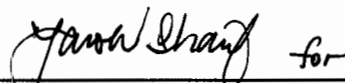
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather information and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



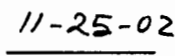
Dr. Ines R. Triay, Manager
Carlsbad Field Office



Date

 for

John Lee, Manager
Westinghouse TRU Solutions



Date

DESCRIPTION OF THE WIPP WASTE MINIMIZATION PROGRAM

A program is in place at the Waste Isolation Pilot Plant (WIPP) to minimize the quantity of hazardous waste that is generated. This program is in place to reduce the volume and toxicity of hazardous waste generated by the facility's operation to the degree determined to be economically practical. In addition, the proposed method of treatment, storage, or disposal is the most practical method currently available which minimizes the present and future threat to human health and the environment.

The WIPP Waste Minimization Program contains the following elements:

a. Written policy that outlines goals and objectives

WP 02-EC.11, Waste Isolation Pilot Plant Pollution Prevention Program Plan, outlines several past goals and how they were met. In addition, this plan set new goals for reducing the total generation of hazardous wastes 90% and TRU mixed wastes 80% by 2005.

Activities involving solid waste management units, environmental monitoring, and TRU mixed waste handling are conducted only by highly qualified and trained individuals capable of completing these tasks with minimal errors or waste generation. These skills significantly reduce the generation of waste at the source.

b. Employee training and incentive programs

Every employee at WIPP receives General Employee Training (GET) including elements on waste management, pollution prevention, waste minimization, and emergency response. In addition to GET, employees involved in waste generating or handling activities receive additional training to ensure they are fully qualified to perform the tasks expected. Most of these training programs also have elements in which waste minimization is discussed.

In addition to formal training, WIPP Environmental Compliance Staff strive to raise environmental and pollution prevention awareness with presentations/celebrations of Earth Day and America Recycles Day, with incentives for those who participate. Articles on waste minimization/pollution prevention are also regularly published in the *WIPP Today*, a daily electronic newsletter sent to all project participants/employees. Each of these individual programs is designed to increase employee awareness of their responsibilities to the environment through pollution prevention and to encourage them to implement changes that will reduce wastes generated.

c. Source reduction and/or recycling measures implemented in the last five years

This summary does not cover all the measures put in place to reduce site generated hazardous wastes shipped off-site. However, the WIPP procedure on the handling of voided acidified samples from Environmental Monitoring was changed to include container neutralization allowing disposal to the sanitary sewer.

d. List of capital expenditures and operating costs devoted to source reduction and recycling

WIPP has a budget of approximately \$60K per year to promote and implement pollution prevention and waste minimization activities.

e. Factors that have prevented implementation of source reduction and/or recycling

There are no factors that have prevented the implementation of the WIPP program to reduce wastes generated as a result of solid waste management units or environmental monitoring activities and for wastes derived from the management of mixed TRU wastes.

f. Sources of information on source reduction and/or recycling received at the facility

Two libraries are maintained for information at WIPP; one in the Skeen-Whitlock Building and one at the WIPP Site. Between the two, a copy of most current regulations is maintained. In addition, a number of periodical subscriptions are maintained and widely circulated to WIPP personnel to provide current information on source reduction and recycling. WIPP also supports recycling efforts in the community and state by its membership in the New Mexico Recycling Coalition and its support to the Carlsbad Recycling Committee. In addition, a WIPP representative is currently serving on the Board of Directors for the New Mexico Recycling Coalition. Subscriptions are also held to a number of electronic information sites that provide current regulations, guidance and discussions.

g. Review of additional waste minimization efforts that could be implemented at the facility.

Waste covered by this program element is only generated on a sporadic basis due to unplanned event(s). In order to minimize the generation of these wastes, WIPP personnel are trained on ways to prevent accidents and properly cleanup any spills.

h. Flow chart/matrix detailing wastes produced by quantity, type, and building or area

During this period, no hazardous wastes were generated as a result of solid waste management unit or environmental monitoring activities at WIPP. One 55-gallon drum of non-hazardous waste and two liters of mixed waste were derived from the management of TRU wastes.

The 55-gallon drum contained approximately 9 pounds (4.1 kg) of non-hazardous TRU waste consisting of wipes, smears, and personnel protective equipment used to decontaminate a drum containing TRU wastes from Rocky Flats (Profile RF002.01). This waste was generated in the CH Bay of the Waste Handling Building (Building 411).

The two liters of TRU-mixed waste consists of solidified laboratory wastes generated as a result of analytical processes that resulted in the rejection of a Shipment from Idaho National Environmental and Engineering Laboratory (Shipment Number IN020271, TRUPACT Number 157). This waste was generated in the WIPP on-site laboratory (Building 965).

i. Demonstration of the need to use those processes that generate a hazardous waste

The processes that have the potential to generate waste are required by the HWFP to monitor and protect the environment during the handling/disposal of TRU-mixed wastes.

j. Description of the waste minimization methodology employed

Waste covered by this program is only generated sporadically due to unplanned event(s). Training individuals on ways to prevent accidents and properly cleanup any spills is the approach taken to reduce such waste.

k. Description of the changes in volume and toxicity of waste in comparison to previous years

Waste covered by this program is only generated sporadically due to unplanned event(s). As stated above, nine pounds of non-hazardous TRU waste derived from the management of wastes was generated. In previous years, none of these wastes had been generated. However, the event leading to the generation of this waste was a one time event not anticipated to be repeated and with vigilance on the part of each employee, will likely not be generated in the future.