TENTATIVE AGENDA
for the
RADIOACTIVE AND HAZARDOUS MATERIALS COMMITTEE

September 24-25, 2003
Pecos River Village Conference Center
711 Muscatel Ave.
Carlsbad

Wednesday, September 24

9:30 a.m. CALL TO ORDER
—Representative John A. Heaton, Chair

9:35 a.m. CENTER OF EXCELLENCE FOR HAZARDOUS MATERIALS MANAGEMENT REPORT
—Dr. Alan Moghissi, President, Institute for Regulatory Science
—Wren Stroud, Manager, Western Office, Institute for Regulatory Science

10:00 a.m. WASTE ISOLATION PILOT PROJECT (WIPP): STATUS, PERMITS, UPDATES, MODERN PIT FACILITY
—Dr. Ines Triay, Manager
—Roger Nelson, Chief Scientist

11:00 a.m. NEW MEXICO DEPARTMENT OF ENVIRONMENT: WIPP STATUS, PERMITS, UPDATES
—Ron Curry, Secretary
—Tracy Hughes, General Counsel
—Sandra Martin, Acting Program Manager
—Steve Zappe, Project Leader

12:00 noon LUNCH

1:30 p.m. ENVIRONMENTAL EVALUATION GROUP
—Matthew Silva, Director

2:00 p.m. TECHNOLOGY COMMERCIALIZATION INTERNATIONAL
—Roy Brown, Vice President for Research and Development

2:30 p.m. UPDATE ON ACTINIDE CHEMISTRY EXPANSION
—Ned Elkins, Los Alamos National Laboratory, Carlsbad

3:00 p.m. PERFORMANCE ASSESSMENT REVIEW
—Paul Shoemaker, Sandia National Laboratories, Carlsbad

3:30 p.m. RECESS
Thursday, September 25

9:30 a.m.  CARLSBAD ENVIRONMENTAL MONITORING AND RESEARCH CENTER, NMSU: TOUR OF CENTER, 1400 UNIVERSITY DRIVE
           —Deborah Moir, Associate Director

10:30 a.m. CARLSBAD FIRE DEPARTMENT: UPDATE ON EMERGENCY RESPONSE TRAINING CENTER
           —Mike Reynolds, Fire Chief

11:00 a.m. SMALLEY FOUNDATION ON PIPELINE SAFETY
           —Peter Esposito, Chief Executive Officer
           —Dwight Haddock, President

12:00 noon LUNCH

1:30 p.m. OFFICE OF PIPELINE SAFETY, U.S. DEPARTMENT OF TRANSPORTATION
           —Augustine Lopez, State Liaison

2:30 p.m. ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT, OIL CONSERVATION DIVISION
           —Lori Wrotenbery, Director

3:00 p.m. PUBLIC REGULATION COMMISSION
           —David King, Commissioner
           —Bruno Carrara, General Manager, Pipeline Safety Bureau
           —Joe Johnson, Senior Pipeline Safety Engineer

4:00 p.m. ADJOURNMENT
Center of Excellence for Hazardous Materials Management
Beginning of CEHMM

- At the request of the City of Carlsbad, an Assessment Panel was established
- Report: Assessment of Desirability of the Formation of a Center of Excellence for Hazardous Materials Management in Carlsbad, New Mexico
- Mayor of Carlsbad formed the Interim Board of Directors
Vision Statement

“As a national and international leader in its field, CEHMM shall build alliances among institutions in and near Carlsbad, enhance existing strengths, attract complementary programs and people to Carlsbad and the vicinity, and lead the joint pursuit of excellence in the management of hazardous materials.”
Board of Directors

Dr. Rick Blackburn: instrumental in the development of the Green Zia program of the New Mexico Environmental Dept., Certified Environmental Manager

Dr. Phil Eaton: Vice President for Health Sciences at UNM, noted medical researcher and scholar

Dr. Alan Moghissi: President of the Institute for Regulatory Science, charter member of the U.S. Environmental Protection Agency
Board of Directors, continued

Dr. Goetz Oertel: former US DOE Director of Defense Waste Management, past President and CEO of the Association of Universities for Research Astronomy, Fellow in the White House with the President’s Science Advisor.

Dr. Winston Porter: President of the Waste Policy Center, former Assistant Administrator for Solid Waste and Emergency Response at the U.S. Environmental Protection Agency (EPA).

Chief Michael Reynolds: Chief of the Carlsbad Fire Department, certified Hazardous Materials Technician with a specialty in chemistry.
Member Organizations

- New Mexico State University at Carlsbad
- College of the Southwest
- New Mexico Tech
- New Mexico Jr. College
- US DOE Carlsbad Field Office
- Sandia National Laboratories, Carlsbad Programs Group
- Los Alamos National Laboratory, Carlsbad Operations
- Washington TRU Solutions
- Carlsbad Field Office Technical Assistance Contractors
- Institute for Regulatory Science
- Carlsbad Environmental Monitoring and Research Center
- Emergency Training Facility, Carlsbad Foundation
- University of New Mexico
Structure of CEHMM

- CEHMM Board of Directors
- CEHMM Manager
- Advisory Board

- Education
- Monitoring
- Information and Technical Support
- Research, Development, and Testing
- Administration, Reviews, Meeting Management, and Marketing

- NMSU, CSW, NMJC, NMT, UNM
- CEMRC
- TBD
- CEMRC, LANL, SNL, WTS, CTAC
- RSI
Some of CEHMM’s Proposed Activities

- Develop a program for attracting people to Carlsbad to complete Master’s and Doctoral theses in such fields as environmental management, transportation, business management, mining, engineering, geology and radiochemistry
- Facilitate distance education programs for bachelor, master and doctoral degrees
- Hold an International Conference on Hazardous Materials Management in Carlsbad
Proposed Activities, Continued

- Fund and bring people from Mexico for short courses in hazardous materials management and the requirements of NAFTA and the La Paz Agreement
- Promote bringing more sampling and monitoring work to CEMRC
- Help attract students to the Emergency Response Training Facility
Long term objectives:

- To ensure the stability of the current technical workforce in Carlsbad beyond WIPP and to lay a solid foundation for future expansion
- To improve the efficiency, effectiveness, and availability of the currently performed activities of its members
- Take advantage of WIPP to attract visitors to Carlsbad to attend conferences, workshops, courses, and other technical events
WIPP Update

Dr. Inés Triay
Carlsbad Field Office
U.S. Department of Energy
September 2003

Performance Snapshot

4.5 years of operation
2,012 shipments received
46,834 loaded waste containers disposed
14,896 cubic meters of TRU waste disposed
1 waste panel filled
3 TRU waste storage sites cleaned up

Through September 15, 2003
Ramp Up

Cumulative TRU Waste Shipments to WIPP

Cumulative Cubic Meters of TRU Waste Disposed at WIPP

Through September 15, 2003

Safety Performance

0 releases to the environment
0 contaminated personnel
0 unplanned WIPP worker radiation exposure
2 truck accidents (no injuries, minor damage)

#1 DOE-VPP Star Site recertification & VPP "Superior Star" Award
16 consecutive years "Mine Operator of the Year" in the State of New Mexico

The WIPP safety culture is a "worldwide standard for safety practices."

Business Bestseller
People and Equipment

- 30 tractor trucking fleet
- 92 shipping containers
- 4 mobile characterization lines deployed at TRU sites
- 984-employee workforce:
  - 50 Carlsbad Field Office (CBFO)
  - 45 Carlsbad Field Office Technical Assistance Contractor (CTAC)
  - 38 Los Alamos National Laboratory-Carlsbad (LANL-C)
  - 75 Sandia National Laboratories-Carlsbad (SNL-C)
  - 630 Washington TRU Solutions (WTS)
  - 146 WTS subcontractors (records, security, environmental, information systems)

Facility Changes

- Closure of Panel 1
- Emplacement of waste in Panel 2
- Mining of Panel 3
- Salt pile
### Regulatory Changes

**TRUPACT-II Safety Analysis Report (SAR)**

Revisions increase waste shippability

<table>
<thead>
<tr>
<th>Revision</th>
<th>Date</th>
<th>Issue Addressed</th>
<th>Percent of TRU Waste Inventory Shippable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rev 0</td>
<td>1989</td>
<td>Initial</td>
<td>30%</td>
</tr>
<tr>
<td>Rev 15</td>
<td>1997</td>
<td>Pipe Overpack</td>
<td>60%</td>
</tr>
<tr>
<td>Rev 19</td>
<td>2001</td>
<td>Gas Generation</td>
<td>74%</td>
</tr>
</tbody>
</table>

### Acceleration Plan

- 29 sites completed early or on schedule
- 20 years ahead of original schedule
- $8B savings
  - $3.6B from completion 20 years early
  - $2.1B regulatory improvements
  - $1.2B TRUPACT-III and rail
  - $0.6B mobile/modular equipment
  - $0.5B Central Confirmation Facility

$8B saved

Legacy TRU Waste Mission

Original Plan

$8 billion saved

Performance Management Plan (PMP)

20 years early

Cumulative waste disposed in cubic meters
Acceleration of TRU waste disposal

May 2004: ~34 shipments per week
Current: ~20 shipments per week

Waste Characterization & Safety

<table>
<thead>
<tr>
<th>Unnecessary Procedures</th>
<th>Key Safety Facts</th>
<th>Worker contact time with radioactive waste containers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Headspace gas sampling and analysis</td>
<td>This procedure typically requires sticking a needle through a filtered vent to obtain a headspace gas sample, then replacing the vent.</td>
<td>375,000 worker hours</td>
</tr>
<tr>
<td>Solids sampling and analysis</td>
<td>This procedure typically requires drilling into a waste container with a large drill to extract a coring sample.</td>
<td>8,000 worker hours</td>
</tr>
<tr>
<td>Visual examination as a quality control check on radiography</td>
<td>This procedure requires opening a waste container and physically sorting through its contents.</td>
<td>60,000 worker hours</td>
</tr>
<tr>
<td><strong>Bottom line: eliminating the 3 unnecessary tests will significantly improve the worker safety margin, not only in terms of dosage, but also the potential for contamination events.</strong></td>
<td></td>
<td>443,000 worker hours</td>
</tr>
</tbody>
</table>
RH Waste

Status of EPA approval
- EPA Certification - Notice of Proposed Change was resubmitted April 30, 2003
- EPA attended a Characterization Program demonstration at LANL
- EPA has placed DOE's submissions related to RH waste, as well as EPA's responses, in its public docket

Status of NMED approval
- WIPP submitted a permit modification request (PMR) for RH waste to NMED on June 28, 2002
- NMED issued a notice of deficiency for the RH PMR on March 5, 2003
- WIPP resubmitted an RH PMR on May 5, 2003

Transportation

Challenge: Large-Boxed Waste
Solution: TRUPACT-III

Challenge: Gas Generation
Solution: Regulatory change or ARROW-PAK

Challenge: Limited shipping windows
Solution: negotiated expanded windows with sites and states
EPA Recertification

Phase 1 – Information and Data Collection

Phase 2 – Impact and Performance Assessment Activities

Phase 3 – Completion of CRA Documentation

Submit CRA to EPA
January, 2004

Phase 4 – DOE Response & EPA Decision Period

Compliance determination
Fall, 2004

1996... ...2001 2002 2003 2004

* "Blackout" refers to the period when EPA will focus on the CRA and not devote resources to processing other requests.

Current NAS Committee Status

► Third NAS Committee on "Optimizing the Characterization and Transportation of Transuranic Waste Destined for the Waste Isolation Pilot Plant"

► The primary objectives of this study are: 1) to provide a review of the Department of Energy's program for characterization and transportation of transuranic waste; and 2) to recommend improvements to increase the program's technical soundness, efficiency, cost effectiveness, and safety to workers and the public.

► Committee meetings held:
  - Carlsbad - October 29, 2002
  - Santa Fe - January, 2003
  - Savannah River Site - March 19, 2003
  - Washington, DC - May 9, 2003
  - Irvine, California (final closed meeting) - September 8, 2003

► New NAS Committee report to be released the first of the New Year
Questions & Answers
WIPP and the Modern Pit Facility

NEPA and Site Selection Status Update

September 24, 2003

NM Legislative Committee on Radioactive and Hazardous Materials

Roger Nelson
US DOE Carlsbad Field Office

• Nuclear Posture Review (DOD/DOE) Commissioned by Congress after 9/11

• NPR recommended many changes to U.S. nuclear arms management and delivery strategies (including the need for an MPF)

• Congress authorized DOE to begin planning and definition of an MPF in FY02 appropriations bill

“One thing is now certain - the Los Alamos production capacity will be insufficient to meet future requirements for pits. As a result of the NPR, we seek to accelerate planning and initial design work to establish an MPF. Relevant activities about to begin include preliminary MPF design, associated technology development, and initiation of the National Environmental Policy Act process”.

.........General John A. Gordon
Under Secretary for NNSA, USDOE

Testifying on the Nuclear Posture Review before the Senate Committee on Armed Services....February 14, 2002
Pit production was discontinued in 1989 at the DOE's Rocky Flats Plant near Denver, Colorado. The NNSA initiative calls for a new modern pit facility to be built in the coming decades.

The US is the only nuclear power without the capability to manufacture a plutonium pit.

NNSA has been re-establishing a small pit manufacturing capability at LANL, with plans to complete this interim capability at ~20 pits/year by 2007. However the Nuclear Posture Review indicated a larger capability is needed.22

Why do pits need to be refurbished?

• A "pit" is a hollow sphere of plutonium about the size of a grapefruit and is a critical component of a nuclear weapon.
• The pit functions as a trigger to allow a modern nuclear weapon to operate properly.
• Plutonium continually undergoes radioactive decay, and as the pits age, radioactivity causes physical degradation.
• This impairs the ability of the weapon to operate correctly.
• Uncertainty in pits' reliability potentially places the nation's nuclear deterrent at risk.
• The MPF will maintain the stockpile by producing replacement pits before they reach the end of their useful lifetimes.
• Re-establish capability to manufacture all pit types in the nation’s current nuclear stockpile and meet any future design change requirements in an environmentally compliant manner.

• High tech, state-of-the-art processing and manufacturing facility using automated systems and modular facility approaches.

• Safe operation, with minimum impact on the environment

• Existing pits received from the Pantex Plant in Amarillo, and processed into new pits which will be shipped back to Pantex.

• Depending on production capacity, the MPF cost estimate is between $2.2 and $4.1 billion and will employ about 1,000 operations personnel.

---

**Modern Pit Facility Project Schedule**

<table>
<thead>
<tr>
<th>Planning &amp; Definition Phase</th>
<th>Execution Phase (NEPA Process &amp; Site Selection Completed)</th>
<th>Mission Startup Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Project Plans</td>
<td>Conceptual Design</td>
<td>Prelim. Design (Title-I)</td>
</tr>
<tr>
<td>CD-0</td>
<td>CD-1</td>
<td>CD-2</td>
</tr>
<tr>
<td>Approve Mission Need</td>
<td>Approve System Reqmts.</td>
<td>Approve Cost &amp; Schedule Construction Baseline</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>01</th>
<th>02</th>
<th>03</th>
<th>04</th>
<th>05</th>
<th>06</th>
<th>07</th>
<th>08</th>
<th>09</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
<th>19</th>
</tr>
</thead>
</table>
**NNSA first screened the choice of site down to five potential locations**

The site screening analysis considered the following criteria: population encroachment, mission compatibility, margin for safety/security, synergy with existing/future plutonium operations, minimizing transportation of plutonium, NNSA presence at the site, and infrastructure.

Based upon results from the site screening analysis, the following sites were determined to be reasonable alternatives for the MPF:

1. Los Alamos National Laboratory at Los Alamos, New Mexico;
2. Savannah River Site at Aiken, South Carolina;
3. Nevada Test Site near Las Vegas, Nevada;
4. Pantex Plant at Amarillo, Texas;
5. Waste Isolation Pilot Plant at Carlsbad, NM

After screening, all sites are “equal”:
- LANL
- SRS, So. Carolina
- NTS, Nevada
- Pantex
- WIPP

Screening narrowed final potential locations to 5 sites

MPF interface will be primarily between LANL and Pantex
### Key Milestones for MPF Conceptual Design Phase

<table>
<thead>
<tr>
<th>10/02 Start of Conceptual Design</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop design requirements for Title I</td>
</tr>
<tr>
<td>Supporting studies for design optimization</td>
</tr>
<tr>
<td>Evaluation of major alternatives that impact facility configuration</td>
</tr>
<tr>
<td>Review and decision on preferred facility configuration</td>
</tr>
<tr>
<td>CDR Preparation</td>
</tr>
</tbody>
</table>

#### NEPA-Stage #1
- Need for MPF
- Select host site

#### NEPA-Stage #2
- Size/configuration
- Host site location
- Aqueous/Pyrochem

Ongoing development of manufacturing technology

| FY03 | FY04 | FY05 | FY06 |

---

### Draft EIS Process Status

DEIS concludes that all 5 candidate sites are environmentally acceptable

Some sites will require more mitigation than others

Therefore, the final site selection in Final EIS will be based on 7 non-environmental factors:

- Mission Compatibility
- Workforce Development and Retention
- NNSA Production Complex Integration
- Homeland Security/Safety
- Regulatory Environment
- Infrastructure
- Cost

NNSA requested all 5 sites to provide additional data (non-environmental)

WIPP submitted site-specific data call package on August 5, 2003

Secretary of Energy is the decision maker

FEIS Record of Decision expected April 2004
Establish site evaluation factors to assist Secretary of Energy in selecting the preferred host site:
- Mission Compatibility
- Workforce Development and Retention
- NNSA Production Complex Integration
- Homeland Security/Safety
- Regulatory Environment
- Infrastructure
- Cost
- Environmental Impacts

Site Data Call Process

Establish objective and quantitative data required to support a strengths and weaknesses assessment of each site relative to each evaluation factor

Collect and verify data on each site

August

Complete documentation required for Record of Decision

October

MPF Specifications (125 ppy)

<table>
<thead>
<tr>
<th>Specification</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Concrete (6 yr)</td>
<td>280,000 cubic yards</td>
</tr>
<tr>
<td>Construction Workforce (6 yr)</td>
<td>440 (avg.) - 770 (peak)</td>
</tr>
<tr>
<td>Operations Workforce</td>
<td>988</td>
</tr>
<tr>
<td>Electrical Consumption</td>
<td>9.1 MWe (avg.) – 20.5 MWe (peak)</td>
</tr>
<tr>
<td>Domestic Water</td>
<td>22.5 gpm</td>
</tr>
<tr>
<td>Cooling Tower Makeup Water</td>
<td>117 gpm</td>
</tr>
<tr>
<td>LLW Volume (annual, non-mixed)</td>
<td>2710 cubic yard (1)</td>
</tr>
<tr>
<td>Nonhazardous solid waste (annual)</td>
<td>7200 cubic yards</td>
</tr>
</tbody>
</table>

(1) EIS bounding amount - could be minimized (~0) based on MPF design and operations – LLW shipped either to NTS or WCS
63 Acres
~(1350' x 2000')

- Entry Control Facility (ECF)
- Engineering Support
- Commodities Warehouse
- Waste Storage/ TRU Packaging
- Manufacturing
- Production Support
- Secure Sample Transfer System
- Feed Preparation
- Secure Transfer Containers
- Receipt, Storage & Shipping
- Stemwater Decontamination Basin
- Construction Laydown Area

Temporary - Area will be restricted after construction.

**PIDAS Perimeter Intrusion Detection and Assessment System**

**MPF Layout for 125 ppy**

---

**MPF Reference Location at WIPP**

**Facility footprint:**
- perimeter security area ~60 acres
- access control area ~640 acres

Dedicated corridor from MPF to WIPP for TRU waste transfer

Separate (controlled) access to MPF
What MPF could mean for Southeastern New Mexico:

- Jobs
- Goods and Services
- Economic Stability

MPF Next Steps:

- NNSA to recommend site selection to Secretary of Energy this fall
- FEIS to be published in March, 2004 with Record of Decision in April
Status of WIPP Permit Modifications

Radioactive & Hazardous Materials Committee

September 24, 2003

Sandra Martin
New Mexico Environment Department
Santa Fe, New Mexico

Outline of Presentation

❖ Regulatory Framework for Permit Modifications
❖ WIPP Permit Modification History
❖ Status of Current Permit Modifications
Regulatory Framework for Permit Modifications

- Hazardous Waste Act (§74-4-4.2 NMSA)
  - "A permit may be modified at the request of the permittee for just cause as demonstrated by the permittee."
- Hazardous Waste Regulations (20.4.1.901.B NMAC)
  - Identifies responsibilities of NMED in decision making process
- RCRA Regulations (40 CFR §270.41 - .42)
  - Identifies "causes for modification" by NMED
  - Identifies procedures for modification at the request of the Permittee
- Federal Guidance Documents
  - September 28, 1988 Federal Register – Final Rule

Regulatory Framework: Modification Classification

- Class 1
  - Minor modification
  - Self implementing, no public comment required
- Class 1*
  - Minor modification
  - Requires NMED approval before implementing, no public comment required
- Class 2
  - Minor modification
  - Requires public participation, NMED approval
- Class 3
  - Major modification
  - Requires expanded public participation (multiple comment periods, public hearing), draft permit, NMED approval
Regulatory Framework: Modification Timeframe

- Class 1
  - Immediate implementation
- Class 1*
  - No specific timeframe for NMED decision
- Class 2
  - 90-120 days from submittal to NMED decision
- Class 3
  - Specific timeframes for public comment periods
  - Otherwise, no specific timeframe for NMED decision
  - Flexibility needed for requesting additional information, developing draft permit, time for public hearing, etc.

WIPP Permit Modification History

- WIPP permit issued October 27, 1999
- Modifications received between November 12, 1999 and June 11, 2003
  - 57 separate submittals
  - 198 individual items
  - Approximately 45 inches of shelf space
- Tally by classification
  - 34 Class 1 submittals, 153 items
  - 4 Class 1* submittals, 4 items
  - 13 Class 2 submittals, 32 items
  - 6 Class 3 submittals, 9 items (includes 1 reclass by NMED)
- Items vary in complexity
  - Class 1 – change phone number for emergency coordinator
  - Class 3 – propose new waste characterization scheme for remote-handled waste
Comparison of Application vs. Permit Modifications

- Permit application, with current permit in box

- Permit modifications received to date

Status of Current Permit Modifications

- Electronic Data Management, including Waste Analysis Plan Reorganization
- Remote Handled Waste
- Panel Closure Design Change
- Change of Operational Control
- Construct New Panels
Electronic Data Management and WAP Reorganization

- Class 3 modification received June 28, 2002
- Public comment ended October 3, 2002
- NMED evaluated comments, developed Notice of Deficiency (NOD)
- NOD undergoing internal review
- Permittees may want to reconsider modification request in light of recent Congressional action

RH Waste Characterization and Management

- Class 3 modification received June 28, 2002
- Public comment ended October 31, 2002
- NMED issued NOD March 5, 2003
- Received response from Permittees on May 5, 2003
- Currently refining initial draft of second NOD, to be issued in October 2003
Basis for Requesting Technical Information via an NOD

- NMED views the NOD process as helping the Permittees support their conclusions
- For most Class 3 modifications, all changes are subject to public hearing
- Modifications must be supported by sufficient technical information
  - Such data are subject to rigorous, impartial technical review (NMED, stakeholders, etc.)
  - NMED can only issue a draft permit and recommend approval if NMED's independent review concludes information supports the modification

Panel Closure Design Change

- Class 3 modification received October 8, 2002
- Public comment ended December 12, 2002
- NMED currently deferring action
  - Technical review must be coordinated with EPA
  - EPA unable to commence review until WIPP's recertification is complete
Change of Operational Control

- Class 1* modification received February 28, 2003
- Submittal perceived as low priority in light of other NMED activities
- Discussion with Permittees on September 22, 2003
  - Identified potential for NMED to clarify expectation
  - Clarification may result in submittal of additional information by Permittees

Construct New Panels

- Class 3 modification received May 14, 2003
- Public comment ended July 15, 2003
- NMED plans to develop draft permit and issue for public comment in November 2003
Recent Permit Modifications

♦ Final agency determination issued on September 11, 2003 on six Class 2 modifications submitted in May, 2003

♦ Approvals
  ♦ Removal of booster fans
  ♦ Removal of formaldehyde as analytical parameter
  ♦ Add hazardous waste numbers
  ♦ Revise PCB prohibition

♦ Denials
  ♦ Drum age criteria for new waste containers
  ♦ LANL sealed source exemption from headspace gas

♦ Finalizing response to all public comments

♦ Discussions with Permittees to resubmit requests have been initiated

Questions?