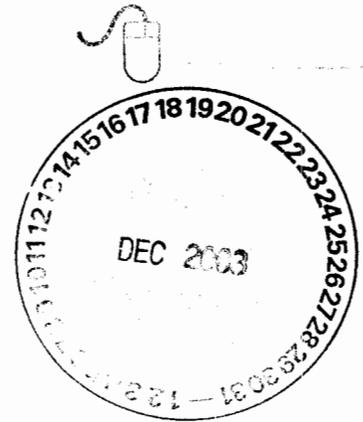




Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
**1 8 DEC 2003**



Mr. Steve Zappe, Project Leader (WIPP)  
Hazardous Waste Permits Program  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 E. Rodeo Park Drive, Building 1  
Santa Fe, New Mexico 87505-6303

Subject: Response to Comments on Hazardous Waste Number D033

Dear Mr. Zappe:

The purpose of this letter is to respond to the issues raised in your December 9, 2003 email to the Carlsbad Field Office (CBFO) and Washington TRU Solutions, LLC (WTS) concerning the New Mexico Environment Department's (NMED) draft responses to public comments on the recent addition of D033 hazardous waste number. The email addresses three primary issues: hexachlorobutadiene compatibility with other waste codes added after issuance of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), analysis and monitoring of hexachlorobutadiene, and generator/storage sites that can ship waste containing hexachlorobutadiene. This letter does not present new information, but merely points to information in the public record that addresses these comments.

Several comments concerned chemical compatibility of hexachlorobutadiene including Comment Numbers 5.2, 7.2, 8.2, and 11.1. On July 14, 2003, CBFO responded in the record to the compatibility issue as recognized in NMED Comment Number 7.2. In the draft response to this comment, NMED agreed that the permittees had evaluated the compatibility of hexachlorobutadiene in the HWFP application (Appendix C1); however, they indicated additional hazardous waste numbers added later had not been included in this evaluation. The record shows that 33 hazardous waste numbers have been added to the HWFP since being issued. In each case, the record provides an evaluation of chemical compatibility using Appendix C1 of the HWFP application. Therefore, each of the 33 hazardous waste numbers added to the HWFP by permit modification had been evaluated for chemical compatibility with chemical compatibility group 17 (hexachlorobutadiene, D033).

Comment Numbers 5.4 and 7.2 address the need for the addition of hexachlorobutadiene to the target analyte lists for headspace gas and room based monitoring. As indicated in the PMR and in Comment Number 7.2 (CBFO response to Comment 54 submitted to NMED on July 14, 2003), hexachlorobutadiene is a semivolatile chemical found in trace quantities in some waste streams. This comment is addressed by the HWFP, Attachment B-3d, which specifies requirements for headspace gas sampling and analysis. This Attachment requires non-target analytes,



Mr. Steve Zappe

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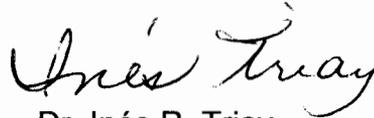
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including hexachlorobutadiene, detected be reported as a tentatively identified compound (TIC) and included in the target analyte list if present in more than 25% of the samples. Therefore, adequate provisions already exist to add hazardous constituent to the target analyte list, when needed. For the same reasons, no changes are necessary to the confirmatory VOC monitoring program. The volatile chemicals were chosen as targets for the confirmatory VOC monitoring program based on their volatility, presence in a large portion of the waste streams, and their risk to human health. The confirmatory VOC monitoring program also provides for the identification of non-target analytes.

Comment Numbers 5.2 and 12.1 indicated that RFETS should be the only generator site permitted to ship D033 waste to WIPP. The HWFP modification request did not indicate that D033 waste was or should be limited to RFETS. The PMR simply indicated that the need for the D033 hazardous waste number was based on the fact the RFETS had identified some waste streams containing hexachlorobutadiene (D033). This is the same method used to support the addition of the other hazardous waste numbers. As indicated in the record, none of the permitted hazardous waste numbers are limited to a single generator site.

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

Sincerely,



Dr. Inés R. Triay  
Manager

CC:

S. Martin, NMED

T. Hughes, NMED