

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JAN 27 2004



Mr. Carl E. Edlund
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Edlund:

The purpose of this letter is to transmit a copy of the Container Management Improvements, Class 3 Permit Modification Request (PMR) to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), submitted to the New Mexico Environment Department (NMED) on January 7, 2003. We also request that the Environmental Protection Agency (EPA) approve modifications to the polychlorinated biphenyl (PCB) approval issued to WIPP on May 15, 2003, consistent with any modifications to the WIPP HWFP made by the NMED as a result of this PMR.

The PCB approval granted to WIPP by EPA (Conditions of Approval III.A.1 and III.A.2) limited storage of PCB waste to:

1. The Parking Area Container Storage Unit consisting of a 115,000 square foot asphalt and concrete surface providing storage space for loaded Department of Transportation (DOT) Type B Packages with up to 1,591 cubic feet of waste, and
2. The Waste Handling Building (WHB) Container Storage Unit consisting of 33,175 square feet of storage area for PCB/TRU waste management and provides for storage up to 2,718 cubic feet of waste.

Condition III.C of the WIPP PCB approval required that EPA be notified of storage area modifications or expansions in capacity and that WIPP receive written approval from EPA authorizing the storage modifications.

The proposed change to the WIPP HWFP, if approved, would expand the area of the parking area container storage unit and increase the storage capacity of the Parking Area Container Storage Unit (PAU) to 119 Contact Handled Packages. This change is addressed in the PMR in Table III.A.2 of the Permit Text and Attachment M, Section M1-1c(2). The change in the storage capacity of the PAU from Capacity to Container Equivalent permitted storage is needed to:

- Meet planned throughput;
- Manage large containers/packages;
- Manage shipments by rail;
- Use the projected fleet of DOT Type B Contact Handled Packages;



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- Provide flexibility to manage off-normal events;
- Provide operational flexibility necessary to continue operations during weather delays, maintenance activities, equipment replacements, and panel room transitions.

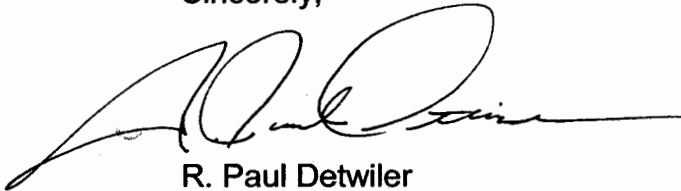
The proposed HWFP change, if approved, would also authorize an increase in the size of the Waste Handling Building (WHB) Storage Unit to 34,665 square feet and its storage capacity to 18,728.3 cubic feet. This change is addressed in the PMR in Table III.A.1 of the Permit Text and Attachment M, Section M1-1c(1). The increased storage capacity within the WHB Unit is needed to:

- Manage large containers/packages;
- Accommodate current/planned throughput and maintenance activities;
- Optimize the waste management process.

These changes would not reduce the ability of the Permittees to provide continued protection to human health and the environment.

If you have any questions concerning the proposed permit modification, please contact Mr. Jody Plum at (505) 234-7462.

Sincerely,



R. Paul Detwiler
Acting Manager

Enclosure

cc: w/enclosure
N. Stone, EPA
J. Sales, EPA
L. Roberts, EPA

cc: w/o enclosure
M. Silva, EEG
S. Zappe, NMED
S. Martin, NMED