



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



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SEP 30 2004



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, NM 87505-6303

Subject: Notification of a Class 1 Permit Modification to the Hazardous Waste Facility Permit, Number: NM4890139088-TSDF, Entitled Addition of a Roof to the Parking Area Container Storage Unit

Dear Mr. Zappe:

The purpose of this letter is to submit this notification of a Class 1 modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Number: NM4890139088-TSDF. The proposed change does not compromise worker safety, human health, or the environment. The purpose of this modification is to:

- Add a roof to the parking area container storage unit for energy conservation purposes.

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

Sincerely,

R. Paul Detwiler, Acting Manager
 U.S. Department of Energy

Steve Warren, General Manager
 Washington TRU Solutions, LLC

Enclosure

cc: w/enclosure
 C. Walker, Trinity Engineering

cc: w/o enclosure
 J. Bearzi, NMED
 J. Kieling, NMED



Mr. Steve Zappe

-2-

bcc: w/enclosure
M. Gerle, WRES
R. Galbraith, WRES
CBFO M&RC

bcc: w/o enclosure
G. Johnson, WTS
L. Steven, WTS
B. St. John, WTS
D. Bignell, WRES
R. Chavez, WRES
RCRA Chronology

Class 1 Permit Modification Notification

Construction of a Roof Within the Parking Area Container Storage Unit

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP HWFP #NM4890139088-TSDF

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
CH	Contact Handled
DOE	Department of Energy
HWFP	Hazardous Waste Facility Permit
FEMP	Federal Energy Management Program
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PAU	Parking Area Container Storage Unit
PMN	Permit Modification Notification
WHB	Waste Handling Building
WIPP	Waste Isolation Pilot Plant

Overview of the Permit Modification Notification

This document contains a Class 1 Permit Modification Notification (**PMN**) to the Hazardous Waste Facility Permit (**HWFP**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the WIPP HWFP.

This PMN is being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions, LLC, collectively referred to as the Permittees, in accordance with the WIPP HWFP, Condition I.B.1, 20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Section 270.42 (a) of Title 40 of the Code of Federal Regulations (**CFR**). This change does not reduce the ability of the Permittees to continue to protect human health and the environment.

The changes to the WIPP HWFP and related supporting documents are provided in this PMN. The revisions to the text of the WIPP HWFP have been identified using a double underline and revision bar in the right hand margin for added information, and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by *italicized* text.

The portions of the WIPP HWFP which are affected by the PMN are included in Attachment A, Table 1.

The proposed changes to the WIPP HWFP are included in Attachment A, Revised Permit Text. The only changes required are the revision of six illustrations.

A drawing of the new roof structure, for informational purposes only, is included in Attachment B.

Attachment A

Description of the Class 1 Permit Modification Notification

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notification

No.	Affected Permit Section	Item	Category	Attach A Page #
1	a.1. Figure F-1 a.2. Figure F-6 a.3. Figure F-8 b.1. Figure G-2 c.1. Figure M1-2 d.1. Figure O3-4	Revise figures to indicate that a roof has been constructed in the Parking Area Unit.	F.2.b	A-3

Item 1

Description:

This permit modification is to notify the New Mexico Environment Department that a roof is being constructed within the Parking Area Container Storage Unit (**PAU**) to provide shade for waste packages for the purpose of energy conservation. This roof will cover only a small part of the PAU. This change will require the revision of several figures within the HWFP.

This notification qualifies as a Class 1 as specified in 20.4.1.900 NMAC, incorporating 40 CFR § 270.42, Appendix I, Item F.2.b, that is entitled: "*Addition of a roof to a container unit without alteration of the containment system*".

Basis:

Currently, when Contact Handled (**CH**) Packages (i.e., TRUPACT-IIs or HalfPACTs) arrive at the WIPP facility, the CH Package is stored in the PAU until the CH Packages can be brought into the Waste Handling Building (**WHB**) for processing. During the time the CH Packages sit in the PAU, they act as "heat sinks" and temperatures on the exterior of the CH Packages can rise to 150 degrees Fahrenheit. Therefore, by shading the CH Packages before they enter the WHB, less energy is consumed by the air conditioning system. The Federal Energy Management Program (**FEMP**) has approved this energy savings program and therefore the Permittees are proceeding with this construction.

The FEMP is an energy management program instituted by the DOE (<http://www.eere.energy.gov/femp>). The addition of a roof in the PAU will reduce the heating of the CH Packages and will subsequently reduce the load on the air conditioning system within the WHB. This results in an energy savings at the WIPP facility. The roof provides shade for the CH Packages. If the CH Packages are above ambient temperature when they are moved into the WHB, the air conditioning units supporting the WHB will have to run longer to compensate for the temperature change of the air in the WHB. The package submitted to the DOE on this project will be included in the Operating Record.

Because secondary containment is provided by the CH Packages when in the PAU, construction of the roof will not alter this containment system.

Discussion:

In an effort to reduce energy usage throughout the DOE complex the DOE has instituted the FEMP. As part of that program, the Permittees have identified an energy savings program which will require the construction of a roof over a portion of the PAU to shade CH Packages and thereby reduce energy consumption in the WHB.

No changes to the Inspection Plan, Contingency Plan, aisle space requirements, or container management portions of the HWFP are required. No change in the containment system or the run-on/run-off pattern will be affected by the roof. No new concrete slab is required as the roof will be placed on an existing concrete and asphalt slab in the PAU. No new storage areas are proposed. There will be no change in the manner in which CH

Packages are managed in the PAU. Therefore, the management requirements in the HWFP including Module III.A.2, such as aisle space requirements, do not require revision.

The roof will be approximately 170 feet in length, approximately 40 feet deep which is the length of the existing concrete pad in the PAU. The roof will be approximately 19 feet high to accommodate a trailer with TRUPACT-IIs. Tractors, trailers, empty and loaded CH Packages, forklifts, and other equipment currently used in the PAU may be stored under the roof structure. A diagram of the roof is included in Attachment B of this PMN. The "as built" drawings will be included in the Operating Record.

Revised Permit Text:

- a. 1. Figure F-1 has been revised
- a.2 Figure F-6 has been revised
- a.3 Figure F-8 has been revised
- b.1 Figure G-2 has been revised
- c.1 Figure M1-2 has been revised
- d.1 Figure O3-4 has been revised

(The PAU roof is indicated on the figures as a rectangle in the southeast corner of the PAU)

Attachment B
Revised Figures and Roof Structure Drawing

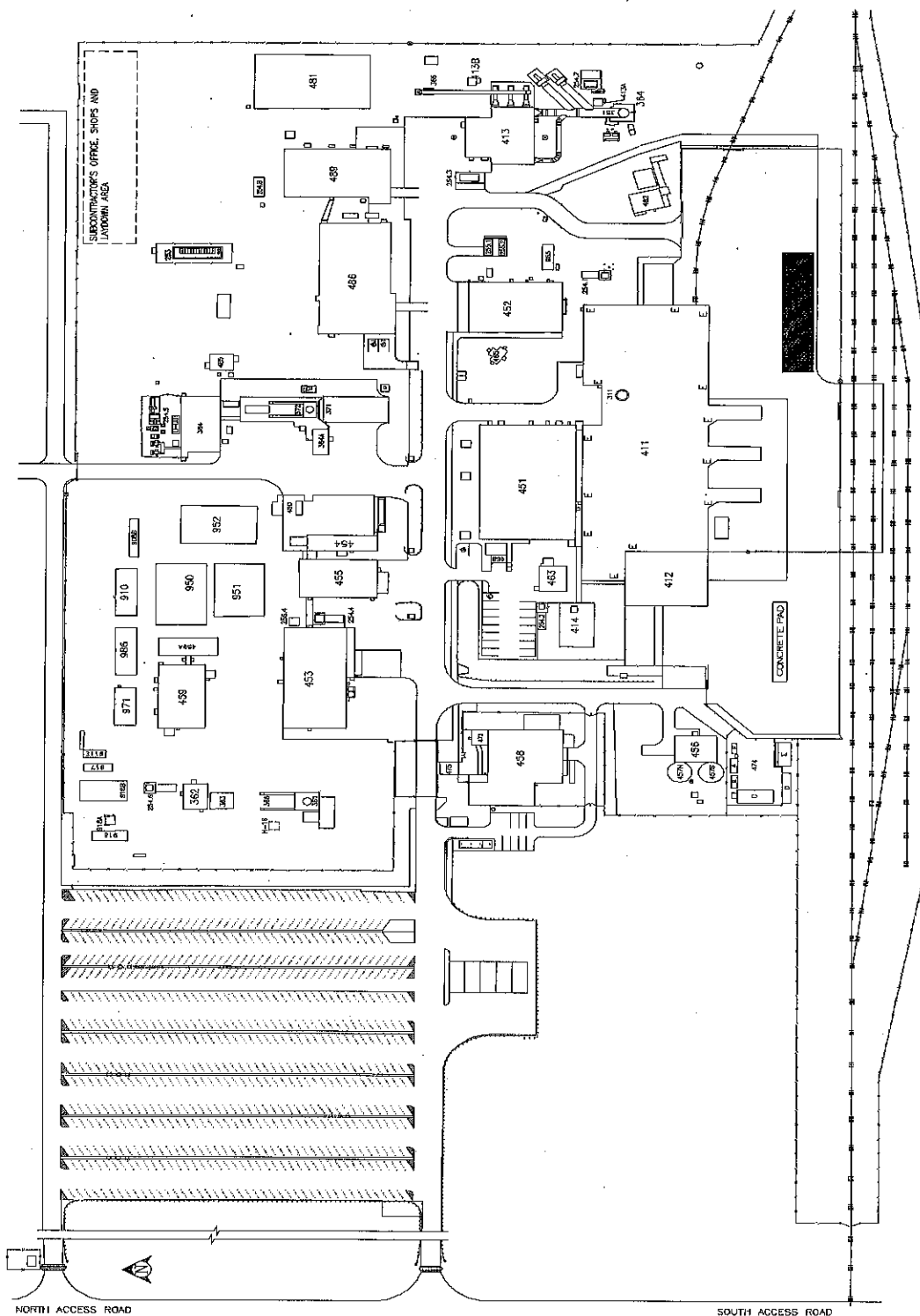


Figure F-1
WIPP Surface Structures

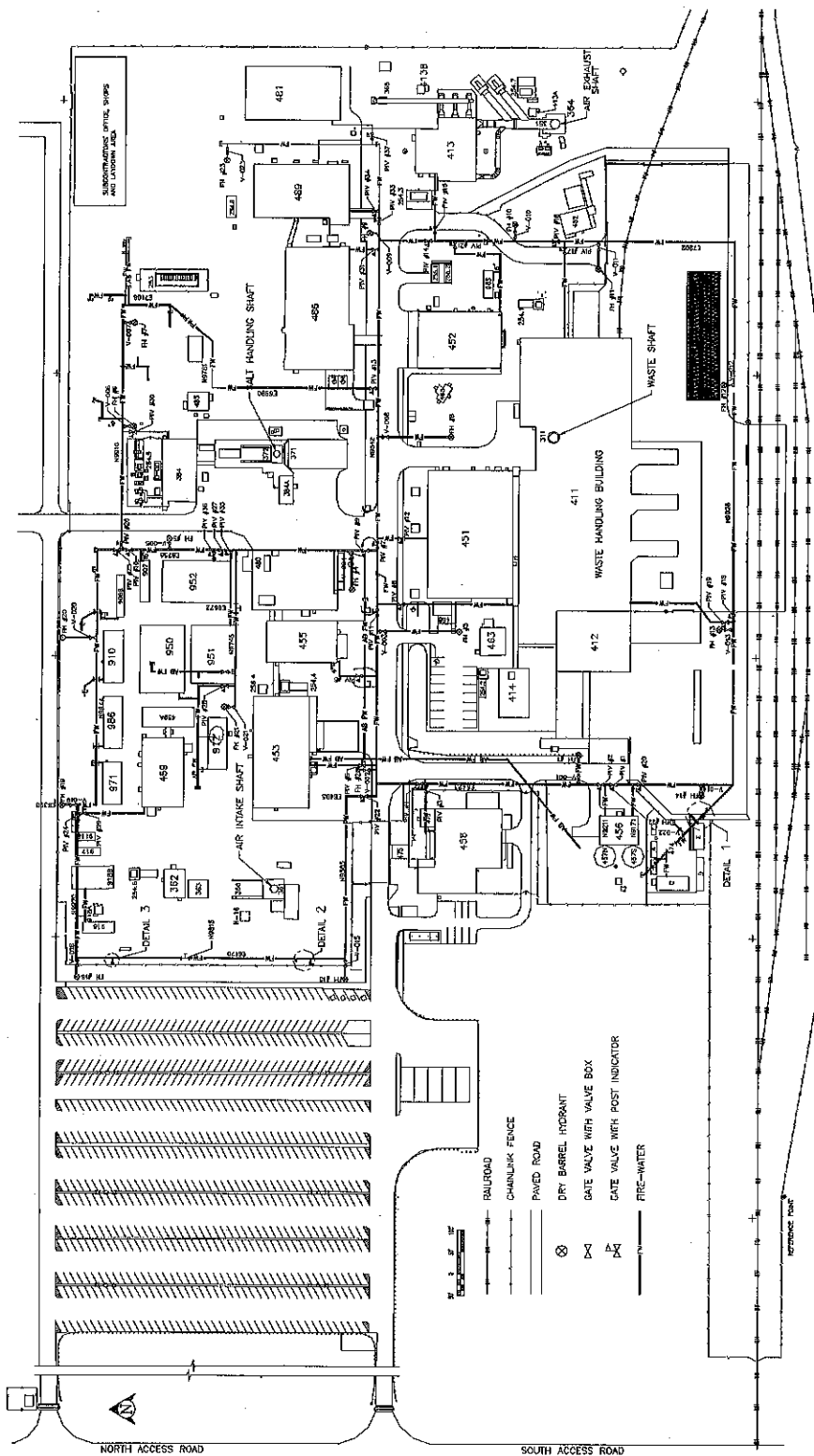


Figure F-6
Fire-Water Distribution System

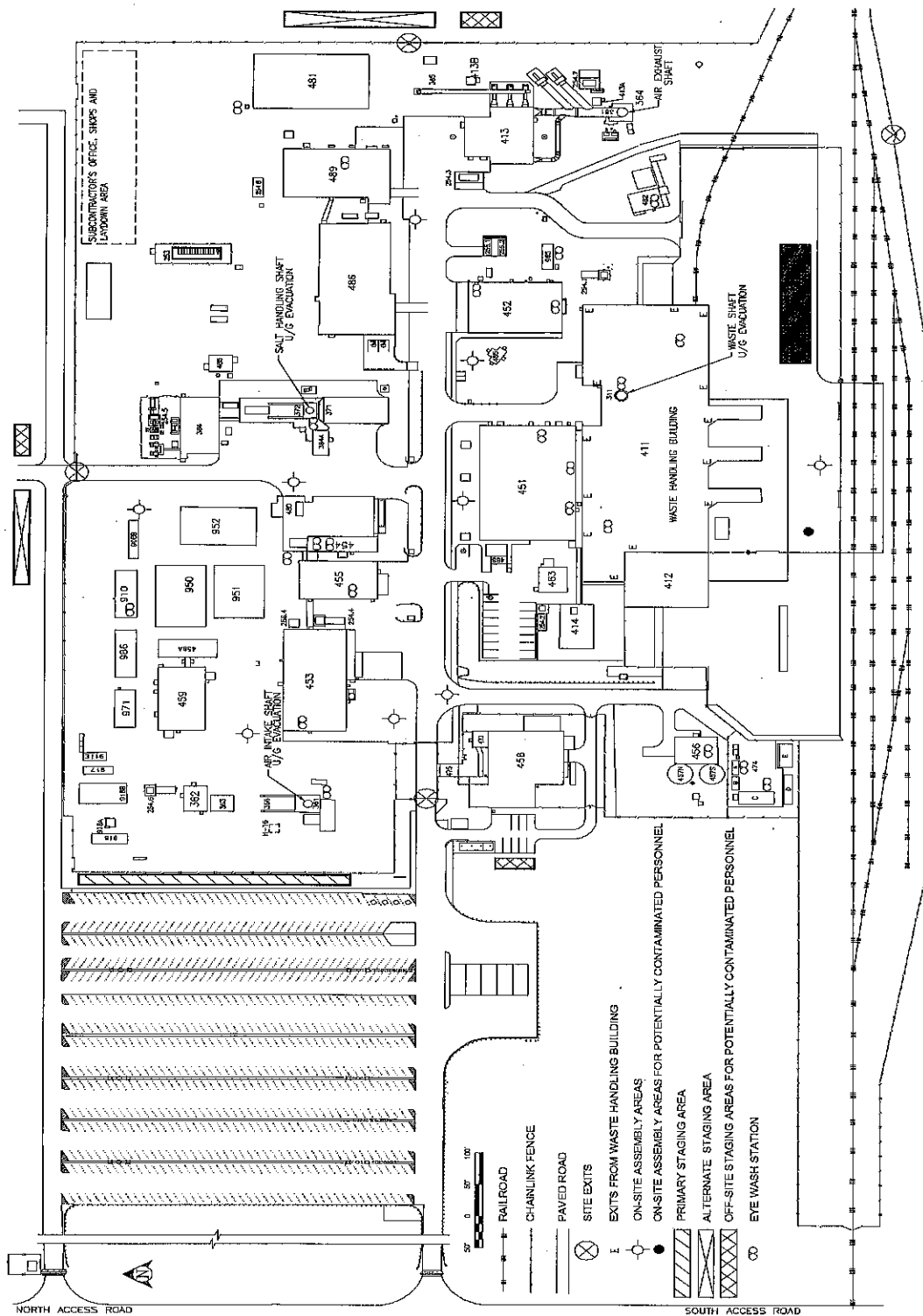


Figure F-8
 WIPP On-Site Assembly Areas and WIPP Staging Areas

Figure G-2
WIPP Traffic Flow Diagram

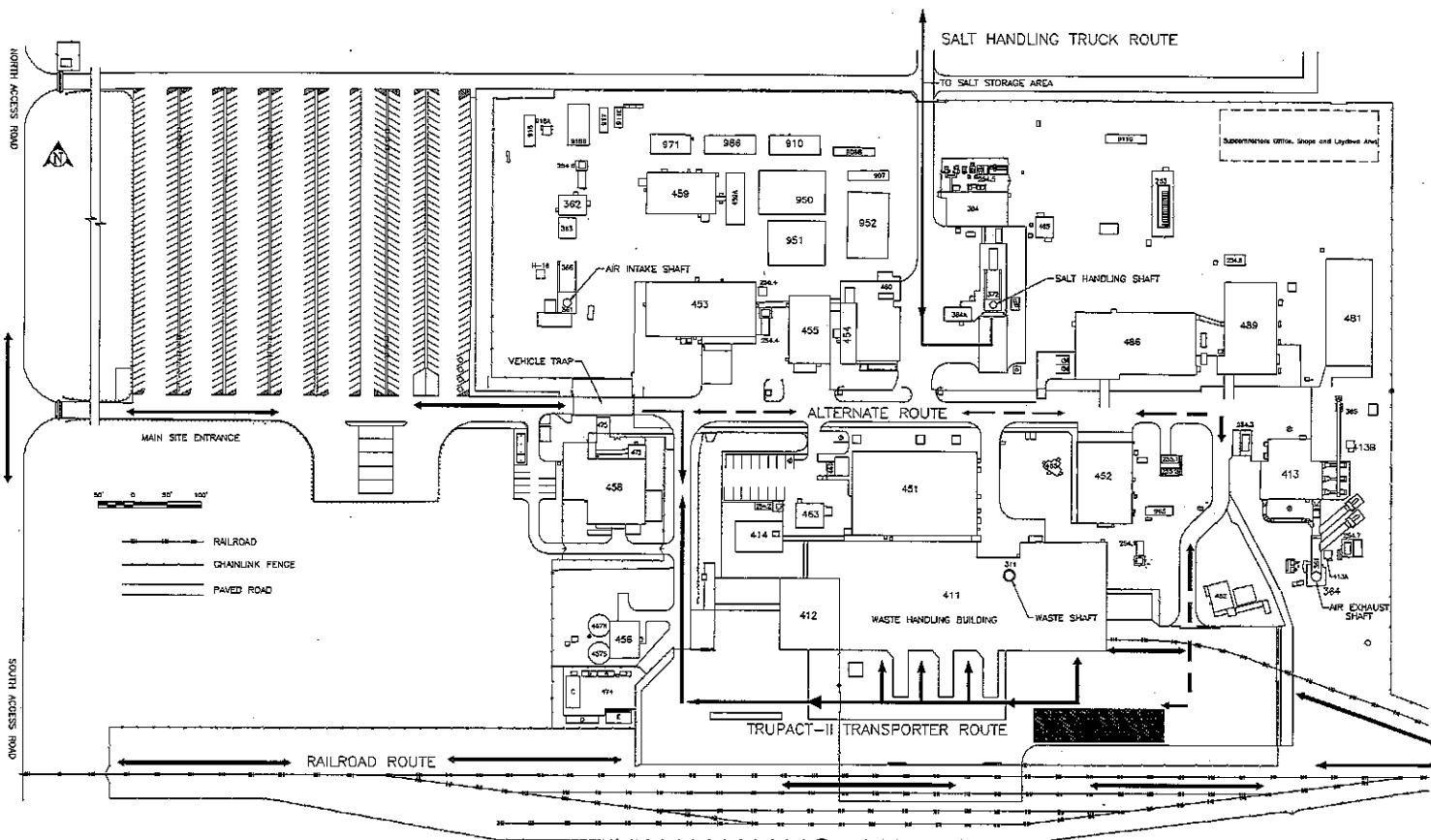


Figure M1-2
Parking Area - Container Storage Unit

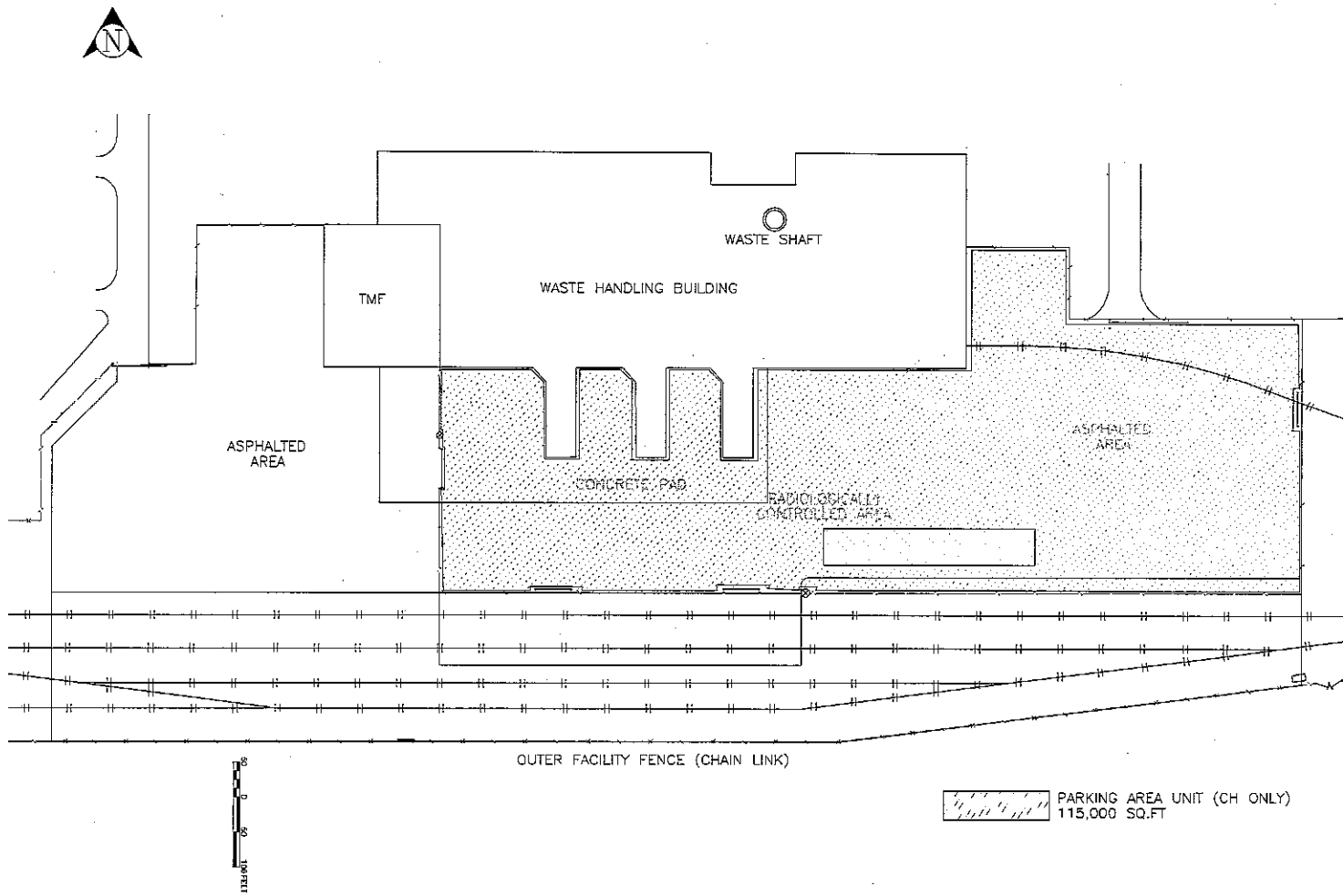
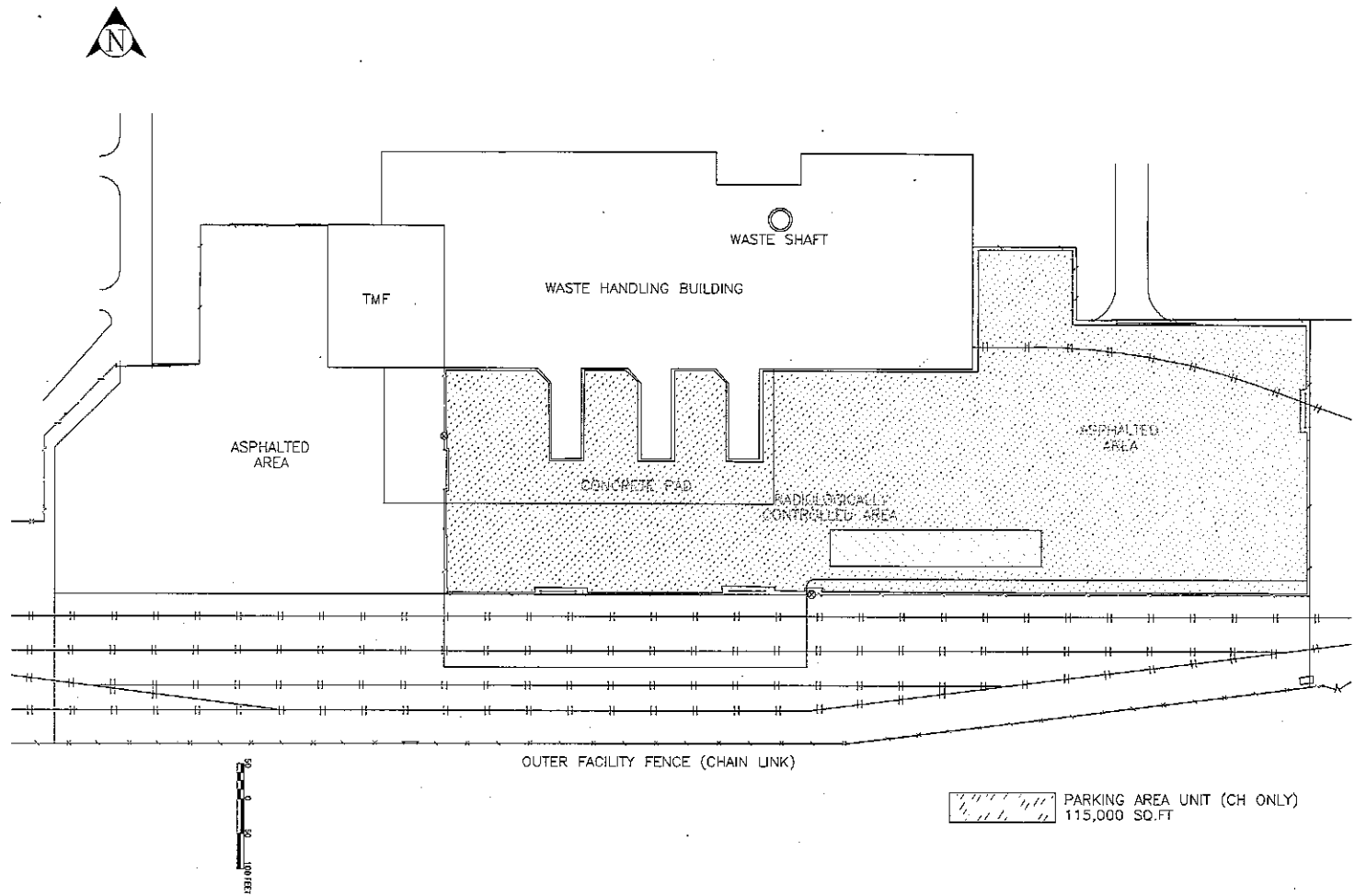
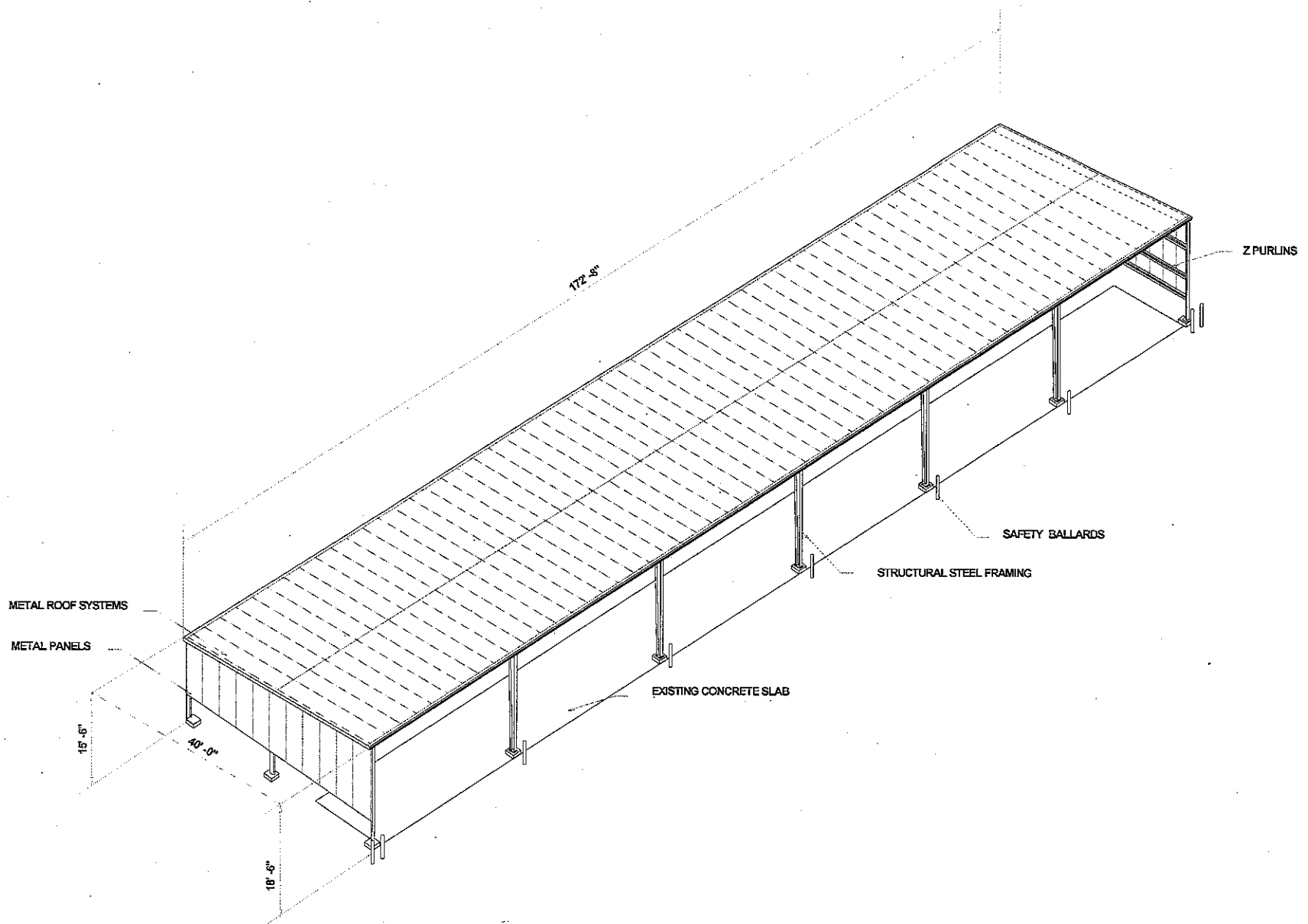


Figure O3-4
Parking Area - Container Storage Unit





Parking Area Unit - Roof