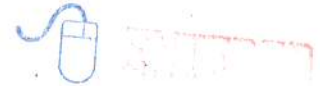




Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221



DEC 02 2004

Mr. Ron Curry  
Office of the Secretary  
New Mexico Environment Department  
Harold Runnels Building  
1190 St. Francis Dr.  
Santa Fe, New Mexico 87502-2855




Subject: Transmittal of Annual Waste Minimization Certification

Dear Secretary Curry:

The purpose of this letter is to submit the Waste Isolation Pilot Plant's (WIPP) Annual Waste Minimization Certification. This certification is required by the WIPP Hazardous Waste Facility Permit (HWFP) Condition VII.B.1 to certify that a Waste Minimization Statement has been entered into the WIPP Operating Record as required by HWFP Condition I.E.10.b, and 20 NMAC 4.1.500 [incorporating 40 CFR § 264.73(b)(9)]. The certification has been prepared in accordance with 20 NMAC 4.1.900 [incorporating 40 CFR §270.11 (d)].

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

Sincerely,

  
Lloyd L. Piper  
Acting Manager

Enclosure

cc: w/enclosure  
J. Bearzi, NMED  
J. Kieling, NMED  
S. Zappe, NMED  
C. Walker, Trinity Engineering  
CBFO M&RC



## ANNUAL WASTE MINIMIZATION CERTIFICATION

A program is in place at the Waste Isolation Pilot Plant (WIPP) to minimize the quantity of hazardous waste that is generated. The purpose of this Waste Minimization Statement is comply with Hazardous Waste Facility Permit (HWFP) Condition VII.B.1, and 20.4.1.500 NMAC [incorporating 40 CFR §264.73(b)(9)] by entering into the operating certification that a waste minimization program is in place at the WIPP. This program has been implemented to reduce the volume and toxicity of hazardous waste generated by the WIPP's operation. Waste Minimization is achieved to the degree determined by the WIPP to be economically practicable. The proposed methods of treatment, storage, or disposal are the most practicable methods currently available to the WIPP. These methods minimize 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 HWFP Condition I.E.10.b and 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)). The HWFP requires this certification for hazardous waste generated as a result of corrective action(s) for solid waste management units, environmental monitoring activities, and for waste derived from the management of TRU-mixed waste.

This annual Waste Minimization Certification addresses the period from October 1, 2003 through September 30, 2004. During this period, 446 gallons of hazardous waste was generated as a result of solid waste management activities. Of the 446 gallons generated, approximately 5 gallons of hazardous waste was generated from environmental monitoring activities at WIPP. There was no hazardous waste generated at the WIPP site from the management of TRU-mixed waste.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather information 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 be 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.

  
Lloyd L. Piper, Acting Manager  
Carlsbad Field Office

11/30/04  
Date

  
Steven D. Warren, General Manager  
Washington TRU Solutions

11/29/04  
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 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 that minimizes the present and future threat to human health and the environment.

The WIPP Waste Minimization Program contains the following elements:

### **a. WRITTEN POLICY**

The Waste Isolation Pilot Plant Pollution Prevention Program Plan, WP 02-EC.11, identifies and outlines past goals and how they were met. In addition, this plan sets new objectives for source reduction and recycling of hazardous waste at WIPP by 90% and TRU mixed waste by 80% in FY 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 trained skills significantly reduce the generation of waste at the source.

### **b. EMPLOYEE TRAINING**

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 generation, handling activities, and emergency response receive additional training to ensure that they are fully qualified to perform the expected tasks. Waste handling personnel receive specific training to minimize the generation of hazardous waste that pertains to their specific job duties. Most of these training programs have elements in which waste minimization, source reduction, and recycling strategies are included.

### **c. SOURCE REDUCTION AND/OR RECYCLING MEASURES**

This summary does not cover all the measures put in place to reduce WIPP generated hazardous waste that is shipped off-site. Over the past five years the WIPP has begun recycling used oil, antifreeze, fluorescent light bulbs, high intensity discharge lamps, high pressure sodium lamps, wood, plastic, and metal on an on going basis.

### **d. CAPITAL EXPENDITURES AND OPERATING COSTS**

WIPP started FY2004 with a budget of approximately \$61.8 K per year to promote and implement pollution prevention and waste minimization activities. Due to realignment and reallocation of funds the pollution prevention budget was reduced by \$50 K.

**e. FACTORS THAT HAVE PREVENTED IMPLEMENTATION**

There are no factors that have prevented the implementation of the WIPP program to reduce waste generated as a result of solid waste management units, environmental monitoring activities, or waste derived from the management of mixed TRU waste. Other waste streams that could generate a hazardous waste are reviewed regularly to ensure minimization of the hazardous constituents. Hazardous waste generated that the WIPP has no control over to prevent or minimize are not included in this program. An example of such a waste is ring water from the exhaust shaft or catch basin water from the waste shaft.

**f. SOURCES OF INFORMATION**

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 the 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. Subscriptions are also maintained for a number of electronic information sites that provide current regulations, guidance, and discussions.

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 and the Carlsbad Beautification Committee. In addition, a WIPP representative is currently serving on the Board of Directors for the New Mexico Recycling Coalition.

Also, the WIPP has access to a Department of Energy (DOE) material exchange website to seek material reuse opportunities, if possible, prior to disposal.

**g. INVESTIGATION OF ADDITIONAL WASTE MINIMIZATION EFFORTS**

The majority of waste covered by this program element is generated due to unplanned event(s). In order to minimize the generation of these waste, WIPP personnel are trained on ways to prevent accidents and properly clean up any spills.

**h. FLOW CHART/MATRIX (NOTE: No changes made as indicated on the form).**

During this period, no hazardous waste was generated as a result of solid waste management unit activities. Less than five gallons of hazardous waste were generated from environmental monitoring activities at WIPP. There was no hazardous waste generated as a result of processing TRU-mixed waste for WIPP disposal.

There were less than five gallons of hazardous waste generated by the WIPP portable environmental laboratory in support of environmental monitoring activities during FY2004. This hazardous waste was disposed upon completion of activities that generated the waste.

**i. DEMONSTRATION**

In accordance with the HWFP, processes that have the potential to generate waste are monitored to ensure protection of the environment during the handling/disposal of TRU-mixed waste.

**j. DESCRIPTION**

The majority of waste covered by this program is generated due to unplanned event(s). Training individuals on ways to prevent accidents and minimize spill cleanup is the approach taken to reduce such waste. The substitution of a non-hazardous material for a hazardous material is used whenever possible to further minimize the generation of hazardous waste.

Laboratory personnel utilize proper administrative, management controls, and training to minimize waste generated by the analytical laboratory.

**k. DESCRIPTION OF THE CHANGES**

The majority of waste covered by this program is generated due to unplanned event(s). In FY2004, there was less than five gallons of hazardous waste generated at WIPP by the portable environmental laboratory in support of environmental monitoring activities. In previous years, minimal amounts of hazardous waste were generated from decontamination activities of TRU-mixed waste received for WIPP disposal or from environmental monitoring activities. Every effort is utilized to minimize the waste generated by these activities.