



**Department of Energy**  
 Carlsbad Field Office  
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MAR 24 2005

ENTERED



Mr. Steve Zappe, Project Leader (WIPP)  
 Hazardous Waste Permits Program  
 Hazardous Waste Bureau  
 New Mexico Environment Department  
 2909 E. Rodeo Dr. Bldg 1  
 Santa Fe, New Mexico 87502-6303

Subject: Notification of a Class 1 Permit Modification to the Hazardous Waste Facility Permit, Permit Number: NM4890139088-TSDF for Additional Waste Handling Equipment


Dear Mr. Zappe:

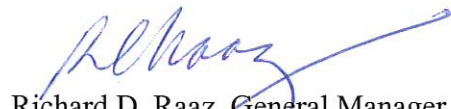
The purpose of this letter is to submit this notification of a Class 1 modification to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit, Number: NM4890139088-TSDF. The proposed change does not compromise worker safety, human health, or the environment. The purpose of this modification is to reflect changes for additional waste handling equipment needed as a result of receiving supercompacted waste at the WIPP facility:

- A low clearance forklift for magnesium oxide emplacement
- Magnesium Oxide (MgO) supersack emplacement racks

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my 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 my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

  
 Ines Triay, Acting Manager  
 U. S. Department of Energy

  
 Richard D. Raaz, General Manager  
 Washington TRU Solutions LLC

Enclosure

cc: w/enclosure  
 C. Walker, Trinity Engineering  
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 \*ED Denotes Electronic Distribution



**Class 1 Permit Modification Notification**

**Additional Waste Handling Equipment to Support Magnesium Oxide  
Emplacement**

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

**WIPP HWFP #NM4890139088-TSDF**

*March 24, 2005*

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## Acronyms and Abbreviations

CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	Department of Energy
HWFP	Hazardous Waste Facility Permit
MgO	Magnesium Oxide
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PMN	Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
TSDf	Treatment, Storage and Disposal Facility
WIPP	Waste Isolation Pilot Plant
WTS	Washington TRU Solutions LLC

## 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**), Carlsbad Field Office (**CBFO**) and Washington TRU Solutions LLC (**WTS**), 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 Title 40 of the Code of Federal Regulations (40 **CFR**) §270.42(a)). The PMN in this document is necessary for the following reason:

- to update the HWFP to reflect changes for additional waste handling equipment needed as a result of receiving supercompacted waste at the WIPP facility.

This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modification to the WIPP HWFP and related supporting documents are provided in this PMN. The proposed modification to the text of the WIPP HWFP has 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.

**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	Attachment A Page #
1	a. Attachment M1	Revise language to reflect changes for additional waste handling equipment needed as a result of receiving supercompacted waste.	A.1	A-3

## Item 1

### Description:

The WIPP facility is preparing to begin accepting supercompacted waste which may increase the quantity of magnesium oxide (MgO) backfill. In anticipation of this change additional waste handling equipment (new forklift) is being added. This modification will incorporate this forklift into the HWFP. In addition, backfill emplacement racks may be placed in the hazardous waste disposal unit. These racks are described herein.

### Basis:

The change is administrative and informational only and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

### Discussion:

The purpose of this modification is to notify NMED of the following changes

Addition of a low clearance forklift for waste management use and the use of MgO supersack emplacement racks,

The new forklift will be functionally equivalent to the existing equipment meeting the basic design requirements, codes and standards of the HWFP. If this forklift is ever used for the movement of waste it will be maintained and inspected in accordance with all HWFP requirements applicable to the existing waste handling forklift.

The emplacement rack will be used in accordance with the WIPP standard operating procedure (WP05-WH1011, CH Waste Processing) to stack MgO supersacks. The emplacement racks are meant as a safety device to ensure stacks of MgO remain in a vertical position and have no other function in the repository. They will be manufactured from materials (steel) that are already in abundant use in the repository and that are compatible with the hazardous waste.

The final design specifications for these racks, which are designed to be compatible with room closure due to salt creep, will be maintained on file at the facility.

### Revised Permit Text:

a.1. M2-2a(1) CH TRU Mixed Waste Handling Equipment

The following are the major pieces of equipment used to manage CH TRU waste in the geologic repository. A summary of equipment capacities, as required by 20.4.1.500 NMAC is included in Table M2-1.



## Facility Pallets

The facility pallet is a fabricated steel unit designed to support 7-packs, 3-packs, or 4-packs of drums, SWBs, or ten-drum overpacks (**TDOPs**), and has a rated load of 25,000 pounds (lbs.) (11,430 kilograms (kg)). The facility pallet will accommodate up to four 7-packs, four 3-packs, or four 4-packs of drums, four SWBs (in two stacks of two units), or two TDOPs. Loads are secured to the facility pallet during transport to the emplacement area. Facility pallets are shown in Figure M2-3. Fork pockets in the side of the pallet allow the facility pallet to be lifted and transferred by forklift to prevent direct contact between TRU mixed waste containers and forklift tines. This arrangement reduces the potential for puncture accidents. WIPP facility operational documents define the operational load of the facility pallet to ensure that the rated load of a facility pallet is not exceeded.

## Backfill

Magnesium oxide (**MgO**) will be used as a backfill in order to provide chemical control over the solubility of radionuclides in order to comply with the requirements of 40 CFR §191.13. The MgO backfill will be purchased prepackaged in the proper containers for emplacement in the underground. Purchasing prepackaged backfill eliminates handling and placement problems associated with bulk materials, such as dust creation. In addition, prepackaged materials will be easier to emplace, thus reducing potential worker exposure to radiation. Should a backfill container be breached, MgO is benign and cleanup is simple. No hazardous waste would result from a spill of backfill.

The MgO backfill will be managed in accordance with Specification D-0101 (MgO Backfill Specification) and WP05-WH1011 (CH Waste Processing). ~~This~~ These specifications ~~is~~ are kept on file at the WIPP facility by the Permittees.

Backfill will be handled in accordance with standard operating procedures. Typical emplacement configurations are shown in Figure M2-5 and M2-5a.

Quality control will be provided within standard operating procedures to record that the correct number of sacks are placed and that the condition of the sacks is acceptable.

Backfill placed in this manner is protected until exposed when sacks are broken during creep closure of the room and compaction of the backfill and waste. Backfill in sacks utilizes existing techniques and equipment and eliminates operational problems such as dust creation and introducing additional equipment and operations into waste handling areas. There are no mine operational considerations (e.g. ventilation flow and control) when backfill is placed in this manner.

## The Waste Hoist Conveyance

The hoist systems in the shafts and all shaft furnishings are designed to resist the dynamic forces of the hoisting system and to withstand a design-basis earthquake of 0.1 g. Appendix D2 of the WIPP RCRA Part B Permit Application (DOE, 1997) provided engineering design-basis earthquake report which provides the basis for seismic design of WIPP facility structures. The waste hoist is equipped with a control system that will detect malfunctions or abnormal

operations of the hoist system (such as overtravel, overspeed, power loss, circuitry failure, or starting in a wrong direction) and will trigger an alarm that automatically shuts down the hoist.

The waste hoist operates in the Waste Shaft and is a multirope, friction-type hoist. A counterweight is used to balance the waste hoist conveyance. The waste hoist conveyance (outside dimensions) is 30 ft (9 m) high by 10 ft (3 m) wide by 15 ft (4.5 m) deep and can carry a payload of 45 tons (40,824 kg). During loading and unloading operations, it is steadied by fixed guides. The hoist's maximum rope speed is 500 ft (152.4 m) per min.

The Waste Shaft hoist system has two sets of brakes, with two units per set, plus a motor that is normally used to stop the hoist. The brakes are designed so that either set, acting alone, can stop a fully loaded conveyance under all emergency conditions.

#### The Underground Waste Transporter

The underground waste transporter is a commercially available diesel-powered tractor. The trailer was designed specifically for the WIPP for transporting facility pallets from the waste hoist to the Underground HWDU in use. This transporter is shown in Figure M2-6.

#### Underground Forklifts

CH TRU mixed waste containers loaded on slipsheets will be removed from the facility pallets using forklifts with a push-pull attachment (Figure M2-7) attached to the forklift-truck front carriage. The push-pull attachment grips the edge of the slipsheet (on which the waste containers sit) to pull the containers onto the platen. After the forklift moves the waste containers to the emplacement location, the push-pull attachment pushes the containers into position. The use of the push-pull attachment prevents direct contact between waste containers and forklift tines. SWBs and TDOPs may also be removed from the facility pallet by using forklifts equipped with special adapters for these containers. These special adapters will prevent direct contact between SWBs or TDOPs and forklift tines. In addition, the low clearance forklift that is used to emplace MgO may be used to emplace waste if necessary.