



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
NOV 20 2008



Mr. James Bearzi, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 E. Rodeo Park Dr. Bldg. 1  
Santa Fe, New Mexico 87505-6303

Subject: Notification of Planned Change to the Permitted Facility Regarding the Installation of Pallet Stands in the Waste Handling Building at the Waste Isolation Pilot Plant

Dear Mr. Bearzi:

The purpose of this letter is to provide you with this Notification of Planned Change to the permitted facility in accordance with the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit Condition I.E.11. The planned physical alteration to the permitted facility will be completed in phases as described below.

The Permittees plan to install up to thirteen facility pallet stands in the Waste Handling Building (WHB). Three of the stands are planned to be installed in the first phase of the work during the extended shutdown at WIPP beginning on or about November 22, 2008. The anticipated locations of all pallet stands are indicated on Figure 1. The anticipated location of the three pallet stands to be installed during the WIPP shutdown are indicated in red in Figure 1. The others will be installed during periods of future outages. The New Mexico Environment Department (NMED) will be notified in advance of these future installations. This phased approach will minimize impact to waste handling activities and allow time for the required equipment testing and personnel training.

The need for this change is to allow waste to be moved by either the automated facility transfer vehicles or manually operated forklifts within the contact-handled portion of the WHB.

A facility pallet stand will consist of four identical posts or columns, one at each corner of the facility pallet to elevate the facility pallet off of the floor of the WHB. The facility pallet can then be placed on or removed from the pallet stand using either a manually operated forklift or an automated facility transfer vehicle. Each post will be bolted to the floor of the WHB using four, one inch fully threaded anchor rods embedded into the floor of the WHB to a depth of at least eight inches. Following installation, the floor of the WHB will be sealed. Stands will be installed to maintain the Permit required 44 inch aisle space between pallets.

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While installation of the stands is underway waste management activities in the affected area of the WHB will be restricted.

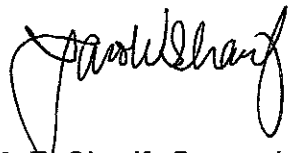
Upon completion of this activity, the change will be certified by a New Mexico registered professional engineer. This certification will be sent to the NMED so that the NMED can make the determination of whether to inspect or not. The Permittees have determined that a Class 1 Permit Modification Notification will be required to reflect these alterations. This Class 1 Permit Modification Notification will be submitted to the NMED once these changes have been approved by the NMED or the NMED waives its inspection.

Please feel free to contact Mr. H. L. (Jody) Plum at (575) 234-7462 if you have any questions regarding this data transmittal.

Sincerely,



David C. Moody, Manager  
Carlsbad Field Office

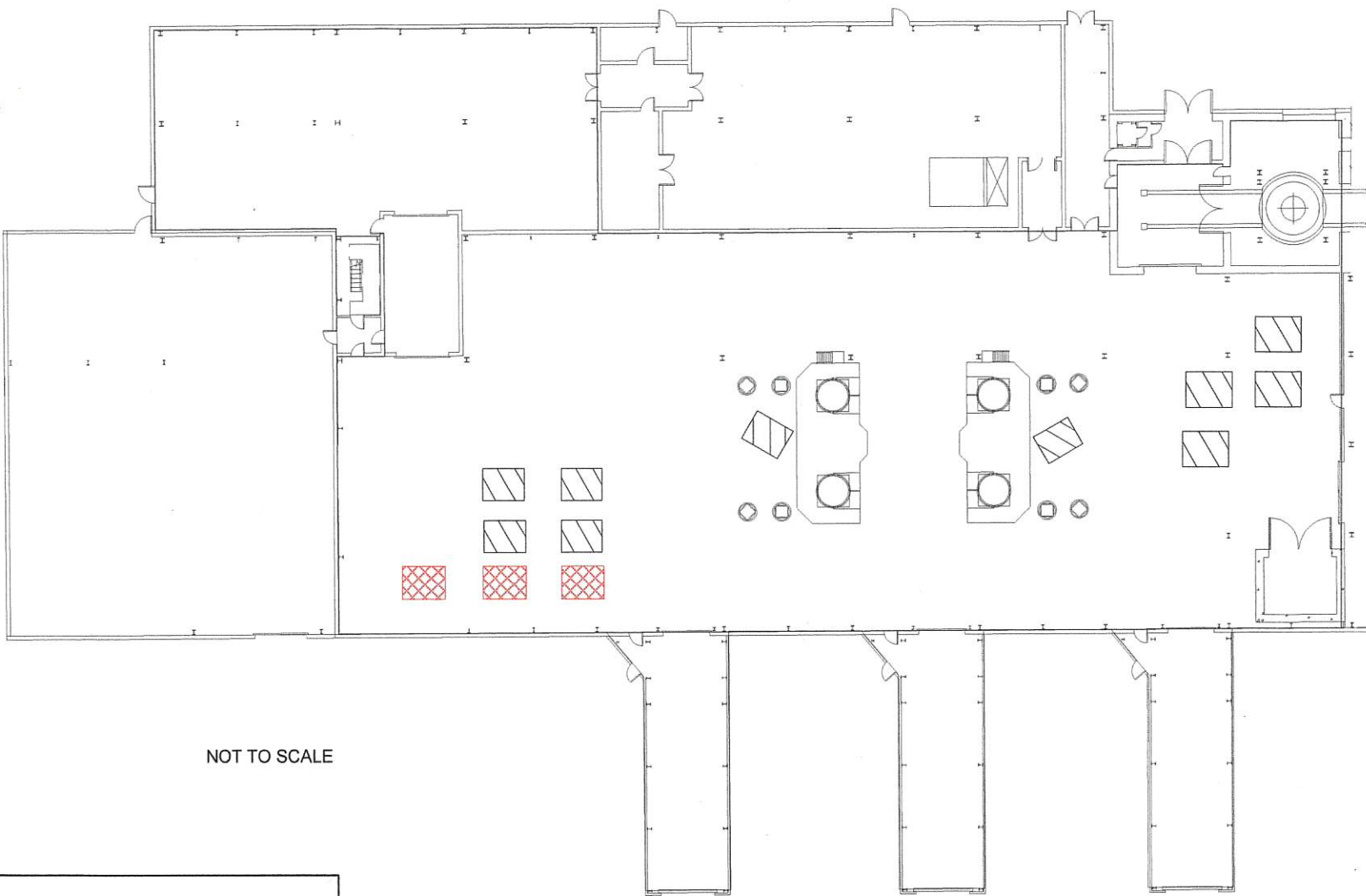


M. F. Sharif, General Manager  
Washington TRU Solutions LLC

Enclosure


cc: w/enclosure  
S. Zappe, NMED


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J. Kieling, NMED



NOT TO SCALE

**LEGEND**

 To be installed during shutdown

 To be installed during future outages

**FIGURE 1**  
Approximate Pallet Stand Locations