

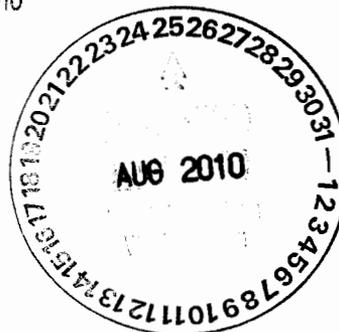


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 25 2010

OFFICE OF  
AIR AND RADIATION

Donald C. Gadbury  
Director, National TRU Program  
Carlsbad Field Office  
Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221



Dear Mr. Gadbury:

We received your letter dated August 24, 2010, requesting the U.S. Environmental Protection Agency's (EPA's) concurrence on the draft certification expansion memo you plan to issue to the Central Characterization Project (CCP) at the Idaho National Laboratory (INL). Your request is in accordance with the Carlsbad Field Office (CBFO) procedures that are intended to ensure that the U.S. Department of Energy's (DOE) Waste Isolation Pilot Plant (WIPP) site certifications correlate appropriately with EPA approvals for waste characterization activities at DOE transuranic (TRU) waste generator sites.

EPA concurs that all waste characterization equipment, procedures and waste streams encompassed in DOE's draft certification expansion memo comport with all of EPA's existing approvals for contact-handled (CH) and RH waste at INL-CCP. This certification expansion adds the EPA Tier 1 approvals for the following:

- Two 30-gallon drums overpacked in 55-gallon drums characterized using the EPA-approved remote-handled (RH) waste characterization processes/procedures implemented by INL-CCP (EPA Air Docket No. A-98-49; II-A4-130);
- INL RH TRU debris containers belonging to the waste stream ID-HFEF-S5400-RH, Lot 1B characterized using the EPA-approved RH waste characterization processes/procedures implemented by INL-CCP (EPA Air Docket No. A-98-49; II-A4-131); and
- OSPREY™ gamma measurement system for reporting the dose-rate fraction for <sup>60</sup>Co and <sup>137</sup>Cs used by INL-CCP (EPA Air Docket No. A-98-49; II-A4-131).

In addition, Attachment 4 of the certification expansion memo includes the revised tiering table reflecting changes made to the tiering designations since the baseline approval of January 12, 2007.

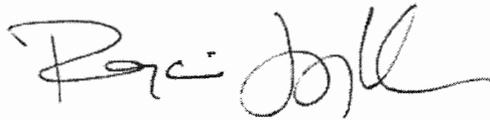


EPA has also received and reviewed Tier 2 tiering reports covering the waste characterization program implemented by CCP at INL and have found all changes made to be acceptable. EPA has concurred with the T2 changes implemented at INL-CCP.

On November 2, 2005 and January 12, 2007, EPA respectively, approved INL-CCP's TRU waste characterization program for characterizing CH and RH waste prior to disposal at the Waste Isolation Plant. The inspection reports are available in the EPA Air Docket No. A-98-49 (Items II-A4-59 and II-A4-72).

Thank you for providing us with an opportunity to review the draft certification expansion memo for INL-CCP. If you have any questions or concerns, please contact Rajani Joglekar at (202) 343-9462 or Ed Feltcorn at (202) 343-9422.

Sincerely,



Rajani Joglekar  
Center for Waste Management and Regulations

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