



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
October 25, 2010



Mr. Carl E. Edlund, Division Director
Multimedia Planning and Permitting Division
U.S. Environmental Protection Agency
1445 Ross Avenue (6PD)
Dallas, Texas 75202-2733

Subject: Environmental Protection Agency (Region 6) Request to use Panel 8 and to Approve Changes to the Conditions of Approval for the Disposal of Transuranic and Transuranic Mixed Waste Containing Polychlorinated Biphenyls

Dear Mr. Edlund:

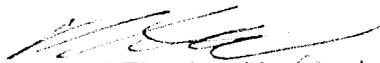
The purpose of this letter is to request the Environmental Protection Agency (EPA) Region 6 approval to use Panel 8 for the disposal of Transuranic (TRU) and TRU-mixed waste containing Polychlorinated Biphenyls (PCBs). The New Mexico Environment Department (NMED) is preparing to issue to the United States Department of Energy (DOE) a Hazardous Waste Facility Permit renewal for the Waste Isolation Pilot Plant (WIPP) that includes authorization to use Panel 8 for the disposal of TRU and TRU-mixed wastes. We anticipate that the permit will be issued in December of 2010. Panel 8 consists of seven rooms (approximately 300 feet long, 33 feet wide and 13 feet high) and two access drifts as depicted in drawing 51-W-214-W, Underground Facilities Typical Disposal Panel. As the NMED is expected to authorize the use of this panel for the disposal of TRU and TRU mixed waste, the DOE, in accordance with the Conditions of Approval II.C, is requesting the EPA Region 6 authorize this panel for disposal of PCB contaminated TRU and TRU mixed waste.

The DOE has also included a list of changes in the PCB Conditions of Approval issued April 30, 2008. These changes will be the result of changes to the WIPP Hazardous Waste Facility Permit when it is renewed by the NMED later this year.

These changes do not reduce the ability of the DOE to provide continued protection of human health and the environment.

If you have any questions concerning the proposed modification, please contact Susan E. McCauslin at (575) 234-7349.

Sincerely,


Edward Ziemianski (EO:1)
Acting Manager

Enclosure(s)



Mr. Carl Edlund

-2-

October 25, 2010

cc: w/enclosures

L. Roberts, EPA

*ED

J. Sales, EPA

ED

N. Stone, EPA

ED

J. Bearzi, NMED

ED

S. Zappe, NMED

ED

CBFO M&RC

* ED denotes electronic distribution

Summary of Change to the Hazardous Waste Facility Permit 2010

The following changes (shown in highlight) are requested to the Conditions of Approval for Disposal of PCB/TRU and PCB/TRU Mixed Waste at the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico:

1. Section II.B.

Disposal Panels 2 through 8 are authorized for disposal of PCB/TRU waste.

2. Section IV.B.1.

The waste volumes authorized for disposal in Panels 2 through 8 are listed in the following table.

Panel #1	Maximum Capacity for CH Waste	Maximum Capacity for RH Waste
Panel 2	636,000 ft ³	N/A
Panel 3	662,150 ft ³	N/A
Panel 4	662,150 ft ³	12,575 ft ³ 400 RH TRU Canisters
Panel 5	662,150 ft ³	15,720 ft ³ 500 RH TRU Canisters
Panel 6	662,150 ft ³	18,860 ft ³ 600 RH TRU Canisters
Panel 7	662,150 ft ³	22,950 ft ³ 730 RH TRU Canisters
Panel 8	662,150 ft ³	22,950 ft ³ 730 RH TRU Canisters

3. Section IV.B.3.

Management and disposal of PCB/TRU waste at the Facility must be consistent with the disposal operations for TRU mixed waste as defined by Parts 1, 2, 3, and 4 of the effective HWFP issued by the New Mexico Environment Department (NMED) pursuant to 20.4.1.500 NMAC incorporating 40 C.F.R. § 264.600, Subpart X (Miscellaneous Units) of the Resource Conservation and Recovery Act (RCRA).

4. Section VI.E.1

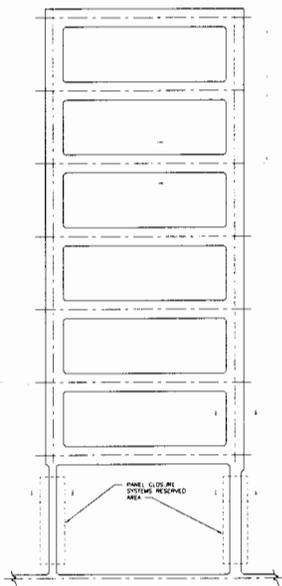
The owner/operator must provide training for employees that handle, transport, store, and/or dispose of PCB TRU waste. Training must include the kind described in Attachment F of the HWFP from the NMED as modified to include PCBs, the General Employee Training (GET) course as modified to include PCBs, and the Hazardous Waste Worker and Hazardous Waste Responder training as modified to include PCBs.

5. Section VI.I.1

Facility operating records of PCB/TRU waste disposal must be maintained as defined in the WIPP HWFP Part 1, Section 1.13 and Part 4, Section 4.8.2.

6. Section VI.M.1

The owner/operator must comply with the WIPP Contingency Plan included in Attachment D of the HWFP which describes detailed emergency response actions to incidents involving TRU waste as modified to include incidents involving PCB/TRU waste.



NOTES 6, 7 & 8
NYS



DISPOSAL ROOM



PANEL DRIFT

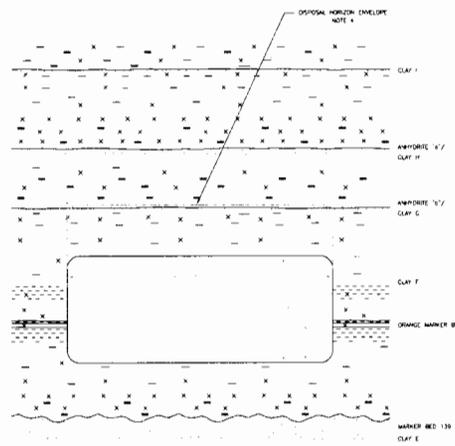


PANEL ACCESS DRIFT #1



PANEL ACCESS DRIFT #2

NOTES 5, 9
NYS



NOTES 1, 2, 9, 10
NYS

REV	DATE	DESCRIPTION	BY	CHK	APP	DATE
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99	12/15/83	REVISED PER PERMITS	WJ	WJ	WJ	12/15/83
100	1/15/84	REVISED PER PERMITS	WJ	WJ	WJ	1/15/84

DESIGN CRITERIA WERE REVISED BASED ON
CONCEPTS FROM THE WASTE DISPOSAL UNIT
DESIGN VALIDATION FINAL REPORT
(OCT 1984)

WASTE DISPOSAL UNIT ROOM ENLARGEMENTS
(MAY 1985)

WASTE DISPOSAL UNIT ROOM ENLARGEMENTS
(MAY 1985)

- WHITE
- AMPHIBOLE
- AMPLIFIED WHITE (NOTE 2)
- POLYMERIC WASTE (NOTE 3)
- AMPHIBOLE STRAGGLES
- CLAY SEAM

1. DESIGN BASED ON REPRESENTATIVE CORE HOLE LOGS AND DRIFT AND CELL ROOM LAYOUTS. ACTUAL CONFIGURATION MAY VARY LOCALY FROM THIS SCHEME.
2. GEOLOGICAL DESCRIPTIONS BASED ON CORE HOLE DATA. MUST NOT BE USED TO DETERMINE THE LOCATION OF UNDERGROUND LEAKS.
3. REPRESENTATIVE OF AMPLIFIED MATERIAL AND POLYMERIC WASTE BASED ON VISUAL TESTS FROM EXAMINATION OF DRIFT CORES AND ENCLAVES IN UNDERGROUND EXCAVATIONS. EXCAVATIONS SHOULD BE LABELED WITH THE RESULTS OF ANALYSES FROM SELECTED CORE USED AS POINT OF REFERENCE.
4. DISPOSAL HORIZON MAY BE SELECTED WITHIN THE ENVELOPE BASED ON GEOLOGICAL, OPERATIONAL, AND SAFETY CONSIDERATIONS.
5. UNDERGROUND AIR SYSTEMS SHALL BE IN ACCORDANCE WITH APPROVED AIR CONTROL PLANS.
6. VENTILATION CONTROLS NOT INCLUDED INITIAL IN ACCORDANCE WITH APPROVED VENTILATION PLANS.
7. IN AND ON WASTE EMPLOYMENT CONFIGURATIONS NOT SHOWN.
8. WIRE CORNERS AS GROUND CONDITIONS MAY REQUIRE.
9. ALL DIMENSIONS REPRESENT NOMINAL VALUES.
10. EXCAVATION HORIZON SHALL FOLLOW THE ORANGE MARKER RED UNLESS OTHERWISE INDICATED.

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