

Zappe, Steve, NMENV

From: Peake.Tom@epamail.epa.gov
Sent: Friday, January 21, 2011 8:38 AM
To: ed.ziemianski@wipp.ws; j.r.stroble@wipp.ws; Marcinowski, Frank; Gelles, Christine
Cc: Alton.Harris@em.doe.gov; Fesmire, Courtland - DOE; Joglekar.Rajani@epamail.epa.gov; Feltcorn.Ed@epamail.epa.gov; Edwards.Jonathan@epamail.epa.gov; Perrin.Alan@epamail.epa.gov; Lee.Raymond@epamail.epa.gov; Zappe, Steve, NMENV; Ploetz, David; Gill, Dorothy; Kelly, Patrick; Patterson, Russ - DOE
Subject: Removing prohibition on use of math formulae for estimating liquids
Attachments: Jan20 Letter to lift math prohibition.pdf



Jan20 Letter to lift
math proh...



Hello,
After discussions with NMED and CBFO, and a revised Hanford certification letter (with which we have separately concurred) we are removing the prohibition on CCPs use of a calculation method to estimate liquid volume during RTR.

We were unaware of the NMED June 2010 permit requirements and believe that NMED's permit is the appropriate mechanism for dealing with this issue. We have agreement between all parties that the RTR operators need to have more training on reporting the results of the estimates, and NMED would prefer that the liquid estimates be rounded up to be conservative. CBFO has committed to training the RTR personnel on this.

In addition, another outcome is that CBFO has committed to developing information on where the hazardous waste permit overlaps or otherwise may affect our waste characterization activities and CBFO, EPA and NMED will participate in a session to go over the areas of potential commonality, and especially capture the recent permit requirements. We will try to coordinate this when we have activities at LANL in the next few months. JR Stroble will lead this effort.

Lastly, after reviewing what has transpired, this was probably more of a communication issue than anything else. It appears to me that if there had been better communication earlier on this topic, then it would not have been an issue. We can discuss this at the February management meeting.

I do not have email addresses for the complete list of people on the distribution list, so I ask JR to send this on to whomever else may need the letter.
Thanks.

Tom Peake
Director
Center for Waste Management and Regulations US EPA (6608J) 1200 Pennsylvania Ave, NW Washington, DC 20460
phone: 202-343-9765



Physical Location and for deliveries:

Room 529

1310 L St, NW

Washington, DC 20005

(See attached file: Jan20 Letter to lift math prohibition.pdf)



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

JAN 20 2011

OFFICE OF
AIR AND RADIATION

Ed Ziemianski
Acting Manager, Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221-3090



Dear Mr. Ziemianski:

We are removing the U.S. Environmental Protection Agency's (EPA) prohibition on the use of a calculation method to estimate liquid volume during real-time radiography. The prohibition was part of EPA's baseline approval dated December 21, 2010, of the Central Characterization Project's (CCP) contact-handled transuranic waste characterization program implemented at Hanford. We believe that the requirements in the June 2010 State of New Mexico's hazardous waste permit issued to the Waste Isolation Pilot Plant (WIPP) can address EPA's concerns. Given the permit requirements, we will coordinate with the New Mexico Environment Department on this issue.

I appreciate that the Carlsbad Field Office has committed to work with EPA, New Mexico Environment Department and CCP to resolve the EPA concerns regarding estimates of liquids via real-time radiography. EPA will continue to evaluate CCP-implemented changes at all sites.

If you have any questions, please contact Tom Peake (202 343-9765).

Sincerely,

Jonathan Edwards, Director
Radiation Protection Division

Enclosure

cc: electronic distribution
Frank Marcinowski, DOE EM
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