

Maestas, Ricardo, NMENV

From: Zappe, Steve, NMENV
Sent: Wednesday, April 27, 2011 5:50 PM
To: Basabilvazo, George
Cc: Bearzi, James, NMENV; Hall, Timothy, NMENV; Holmes, Steve, NMENV; Maestas, Ricardo, NMENV
Subject: Active Room definition

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George –

We received the notification this afternoon required by Permit Attachment O-3b(2) regarding room ventilation rates not being achieved while workers were present in an active room – thanks.

Just so that you and your contract staff don't waste their time trying to develop a Class 1 PMR to redefine what constitutes an "active room", I think you'll find a perfectly adequate explanation already exists in the Permit. First of all, from Attachment N:

N-3a(2) Sampling Locations for Disposal Room VOC Monitoring

For purposes of compliance with Section 310 of Public Law 108-447, the VOC monitoring of airborne VOCs in underground disposal rooms in which waste had been emplaced will be performed as follows:

1. A sample head will be installed inside the disposal room behind the exhaust drift bulkhead and at the inlet side of the disposal room.
2. TRU mixed waste will be emplaced in the active disposal room.
3. When the active disposal room is filled, another sample head will be installed to the inlet of the filled active disposal room. (Figure N-3 and N-4)
4. The exhaust drift bulkhead will be removed and re-installed in the next disposal room so disposal activities may proceed.
5. A ventilation barrier will be installed where the bulkhead was located in the active disposal room's exhaust drift. Another ventilation barrier will be installed in the active disposal room's air inlet drift, thereby closing that active disposal room.
6. Monitoring of VOCs will continue in the now closed disposal room. Monitoring of VOCs will occur in the active disposal room and all closed disposal rooms in which waste has been emplaced until commencement of panel closure activities (i.e., completion of ventilation barriers in Room 1).

This sequence for installing sample locations will proceed in the remaining disposal rooms until the inlet air ventilation barrier is installed in Room 1. An inlet sampler will not be installed in Room 1 because disposal room sampling proceeds to the next panel.

Seems pretty clear to me the term of art is "active disposal room", and by the blue highlighting I'm reinforcing NMED's interpretation to be "an underground disposal room in which waste had been emplaced." Period. If you need more convincing, search for "active disposal room" in Attachment O – it's entirely consistent with this interpretation, instead of a room only being active during the physical emplacement of waste containers in the waste stack or during waste emplacement mode in the underground. It's just like an "active panel" – you put waste in a panel, it's active. It's not like you can flip a switch on and off to make a room active or not...

Thus, if you want to clarify the Permit, propose a global change from "active room" to "active disposal room", and include this definition in Part 1. The problematic language in A2-2a(3) which currently states, "The rooms that are filled with waste will be isolated from the ventilation system, while the rooms that are actively being filled will receive a minimum of 35,000 SCFM of air when workers are present to assure worker safety" should be modified to read, "Closed rooms that are filled with waste will be isolated from the ventilation system, while active disposal rooms will receive a minimum of 35,000 SCFM of air when workers are present to assure worker safety"

I think that should settle the matter. Talk it over with your folks and see if we can agree on this approach.

ENTERED



Steve

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