

PUBLIC INFORMATION MEETINGS

On a Requested Modification to the Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant



WHO: U.S. Department of Energy (DOE) Carlsbad Field Office and Washington TRU Solutions LLC (WTS)

WHAT: DOE and WTS will conduct public meetings to provide information on the following permit modification request to the WIPP Hazardous Waste Facility Permit.

WHEN:

WHERE: Tuesday, October 25, 2011
5 – 6 p.m.
Skeen-Whitlock Building
4021 National Parks Highway
Carlsbad, New Mexico

Thursday, October 27, 2011
2 – 4 p.m. & 6 – 8 p.m.
Courtyard by Marriott
3347 Cerrillos Road
Santa Fe, New Mexico

WHY:

On September 30, 2011, DOE submitted three Class 2 permit modification requests to the New Mexico Environment Department (NMED). The permit modification requests propose to:

1. Revise the WIPP Groundwater Detection Monitoring Program Plan

This modification request is being submitted in accordance with the Groundwater Permit Modification Work Plan as approved by NMED on August 5, 2011. The requested change updates the WIPP Groundwater Monitoring Plan and clarifies Permit language.

2. Update Ventilation Language

The proposed changes will reduce the risk to workers in the underground by allowing them to use the shortest travel path to access ventilation control points thereby minimizing the time spent in the disposal area exhaust air stream. Additionally, it proposes to change a 7-day notification to annual reporting when the Permittees fail to achieve the required ventilation rates.

3. Add a gamma-shielded container for use at WIPP

This request is to add an additional container to the list of approved containers for disposal at WIPP. The container will allow the Permittees to handle waste that is packaged in a gamma-shielded container.

HOW:

To obtain additional information about this permit modification request, contact Mr. Bobby St. John, WTS, at 1-800-336-9477. The permit modification is also available on the WIPP web site at <http://www.wipp.energy.gov> and at the WIPP Information Center, Skeen-Whitlock Building, 4021 National Parks Highway, Carlsbad, N.M. A copy of the requested permit modification also may be obtained from NMED at the address listed below.

COMMENTS:

Written comments for the record must be sent to the NMED contact person at the address below and received no later than 5 p.m. on December 5, 2011:

Mr. Tim Hall
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, N.M. 87505
Phone: 505-476-6049
Fax: 505-476-6060
E-mail: timothy.hall@state.nm.us

QUESTIONS:

The Permittees' compliance history during the life of the permit being modified is available from Mr. Hall at the New Mexico Environment Department.

Any questions or comments to the Permittees regarding this permit modification may be sent to Mr. Bobby St. John, P.O. Box 2078, Carlsbad, N.M. 88221, no later than November 28, 2011.

WIPP Permit Community Relations Plan

On-line: <http://www.wipp.energy.gov>

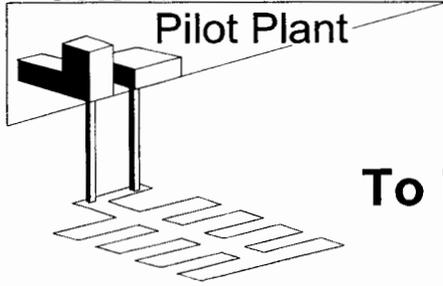
e-mail: communityrelations@wipp.ws

toll-free: 1-866-271-9640

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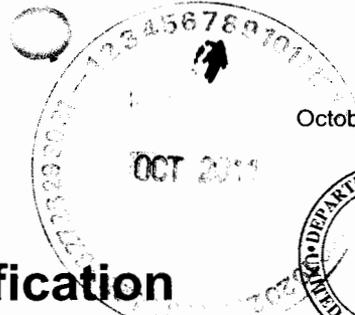
Waste Isolation Pilot Plant



Fact Sheet

DOE Proposes Modification To Hazardous Waste Facility Permit

October 5, 2011



Changes to the WIPP Hazardous Waste Facility Permit

Background

The U.S. Department of Energy Carlsbad Field Office (DOE) and Washington TRU Solutions LLC (WTS) submitted three Class 2 permit modification requests to the New Mexico Environment Department (NMED) to change the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (Permit). The NMED issued the Permit (Permit Number: NM4890139088-TSDF) in November 2010.

What is Proposed?

The proposed modifications submitted to NMED on September 30, 2011, are:

1. Revise the WIPP Groundwater Detection Monitoring Program Plan
2. Update Ventilation Language
3. Addition of a Shielded Container

Revise the WIPP Groundwater Detection Monitoring Program Plan

This modification request is being submitted in accordance with the Groundwater Permit Modification Work Plan approved by NMED on August 5, 2011. The requested changes update the WIPP Groundwater Monitoring Plan and clarify Permit language.

The changes include:

- Revising specific elements of the permit to eliminate sources of confusion
- Identify wells that are used for specific types of measurements
- Clarify the need for and use of various procedures for both field and non-field work
- Remove Total Organic Halogen as a parameter for measurements
- Various editorial changes to update information
- Clarify sampling requirements
- Change frequency of groundwater sampling from semi-annual to annual
- Change frequency of reporting water level values from monthly to semi-annually
- Specify the methodology employed to generate the annual map indicating the rate and direction of groundwater flow

Update Ventilation Language

This modification increases the safety of workers when it is necessary to adjust ventilation in active disposal rooms. Adjusting ventilation allows the facility to direct air into specific areas. The ventilation adjustments ensure that adequate airflow is present where employees are conducting work. Currently, when adjusting ventilation in active disposal rooms, workers are required to travel long distances in the exhaust drift. The exhaust drift or tunnel is designated for air that has already traveled through underground openings, including over the emplaced waste containers. This modification will reduce the amount of time workers spend in the exhaust drift, by allowing them to enter the drift from an adjacent room.

Related to this, some clarification of the reporting requirement is proposed. Currently, there is a 7-day notification requirement whenever ventilation requirements are not met. The Permittees are proposing that the 7-day notification be changed such that these instances are reported annually in the Mine Ventilation Rate Monitoring Annual Report. This change will not reduce the safety or health of employees, the public or the environment.

Addition of a Shielded Container

The generator/storage sites are proposing to package a portion of the remote-handled (RH) transuranic (TRU) mixed waste inventory in gamma-shielded containers for disposal at the WIPP facility. The use of the shielded containers will enable DOE to reduce the time necessary for the packaging and management of RH TRU mixed waste. Shielded containers will be transported to the WIPP in the HalfPACT transportation package and comply with the U.S. Department of Transportation requirements for a Type 7A container. The RH TRU mixed waste that will be packaged in these containers is the same type of waste that is currently being disposed at the WIPP. This waste will continue to count against the total RH TRU waste volume allowed for disposal at the WIPP as specified in the Permit.

The gamma-shielded containers are similar to a 55-gallon drum, however they consist of approximately one-inch of lead shielding that is located between an inner and outer steel wall. A shipment will consist of a three-shielded container assembly. Once they arrive at the WIPP facility, employees will unload and process the shipment in the using existing CH-TRU mixed waste shipment equipment and procedures.

Comments

Comments for the record must be sent to Mr. Tim Hall, New Mexico Environment Department, 2905 Rodeo Park Drive, Building 1, Santa Fe, NM 87505. They also may be e-mailed: timothy.hall@state.nm.us or faxed to 505-476-6060. Only written comments

will be accepted and must be received no later than 5 p.m. (MDT) on December 5, 2011. A copy of the permit modification may be viewed or copied at the NMED offices of Mr. Hall. To be placed on the WIPP mailing list, contact Mr. Hall at the address above.

***For more
Information***

For more information about transuranic waste shipments and procedures, call the WIPP Information Center at 1-800-336-WIPP (9477). This permit modification request is available for review in the Information Repository located on the WIPP home page at www.wipp.energy.gov. Comments to the Permittees regarding this permit modification may be sent to Mr. Bobby St. John, Washington TRU Solutions LLC, P.O. Box 2078, Carlsbad, NM 88221.



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

SEP 29 2011



ENTERED

Mr. John Kieling, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Drive, Building 1
Santa Fe, NM 87505-6303

Subject: Request for a Temporary Authorization for the Referenced Class 2 Permit Modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Permit Number: NM4890139088-TSDF to Facilitate Changes to Protect Human Health and the Environment.

Reference: Letter from Edward Ziemianski, CBFO and M.F. Sharif, WTS to John Kieling, NMED dated September 29, 2011, transmitting a Class 2 Permit Modification Request

Dear Mr. Kieling:

Pursuant to 20.4.1.900 of the New Mexico Administrative Code (NMAC), incorporating Section 270.42(e), Title 40 of the Code of Federal Regulations (CFR), the Department of Energy and Washington TRU Solutions, LLC, collectively referred to as the Permittees, hereby provide you with the following temporary authorization (TA) request.

The Permittees are requesting a TA per 40 CFR 270.42(e)(2)(i) for Item 1 of the referenced Class 2 Permit Modification Request (PMR) submitted to your office on September 29, 2011.

The activity to be conducted under the requested TA is to allow personnel to enter an active remote-handled transuranic (RH TRU) mixed waste disposal room to adjust ventilation regulators when the ventilation rate in the RH TRU mixed waste disposal room is less than 35,000 standard cubic feet per minute (scfm) as described in Item 1 of the referenced PMR.

This TA is needed to facilitate protection of underground personnel at the WIPP as provided by 40 CFR 270.42 (e)(3)(ii)(E) by minimizing potential exposure to emissions from the disposed waste as described in Item 1 of the referenced PMR. The basis for Item 1 of the PMR is to improve the protection of operating personnel by reducing the time the workers must be present in the exhaust air of panels to adjust ventilation regulators. Permit Attachment A4, Section A4-4 states that "[t]he exhaust drift in the waste disposal area will normally not be used for personnel access." Item 1 of the proposed PMR minimizes the chance for exposure to emissions from the waste. Item 1 of the PMR proposes to use the active RH TRU waste disposal room to gain access to the ventilation louvers without requiring workers to travel the longer distances down the exhaust drift. Currently, workers enter the ventilation exhaust areas to adjust ventilation. Item 1 of the PMR proposes to mitigate this circumstance by applying the ventilation requirement for access to rooms that are adjacent to a filled CH (contact-handled) TRU mixed waste disposal room or Room 7 of any panel when CH TRU mixed waste is being disposed thereby allowing access to other active rooms (specifically, active RH TRU mixed

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Mr. John Kieling

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waste rooms) when ventilation is less than 35,000 scfm. This proposed change is consistent with the administrative history of the Permit. The requested activity under the TA is to allow the

Permittees to enter an active RH TRU mixed waste room when ventilation in that room is less than 35,000 scfm to access the ventilation system control bulkhead to make needed operational adjustments. These adjustments are needed to assure there is 35,000 scfm in the active CH TRU mixed waste room before personnel enter. The relief provided by the TA protects workers by reducing exposure to emissions from the disposed waste.

Other than allowing the Permittees to perform the requested activity, this TA would not affect other conditions or requirements of the Permit nor are the Permittees seeking to implement other aspects of the PMR. The Permittees are in compliance with the requirements of 20.4.1.500 NMAC, incorporating 40 CFR Part 264. Therefore, this TA would not impact continued compliance with the requirements of 20.4.1.500 NMAC and provides sufficient information to ensure compliance with 40 CFR 264 standards per 40 CFR 270.42(e)(2)(ii)(C).

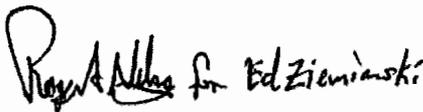
In accordance with 20.4.1.900 NMAC, incorporating 40 CFR 270.42(e)(1), the Permittees are requesting that this TA be effective until the New Mexico Environment Department (NMED) completes the administrative process for the Class 2 PMR, or 180 days, whichever is shortest.

For the reasons delineated above, the Permittees believe the requirements of 20.4.1.900 NMAC, incorporating 40 CFR 270.42(e), have been met and are requesting the issuance of the TA to facilitate changes to protect human health and the environment.

We certify under penalty of law that this document and all enclosures were prepared under our direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions please contact George T. Basabilvazo at (575) 234-7488.

Sincerely,



Edward Ziemianski, Interim Manager
U.S. Department of Energy



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

Enclosure

cc: w/enclosure
J. Davis, NMED *ED
T. Hall, NMED ED
CBFO M&RC
*ED denotes electronic distribution