

 ENTERED

rec'd 10/25/11



Proposed Permit Modification Requests



Proposed Class 2 Permit Modification Requests (PMRs)

- Update Ventilation Language
- Addition of a Shielded Container
- Revise the WIPP Groundwater Detection Monitoring Program Plan

Update Ventilation Language

- The Permittees are submitting this PMR as a *Class 2 modification* as specified in Item A.4.b of Appendix I in 20.4.1.900 NMAC (incorporating 40 CFR 270.42) which states: “*Changes in the frequency of or procedures for monitoring, reporting, sampling or maintenance activities by the permittee: other changes.*”

Update Ventilation Language

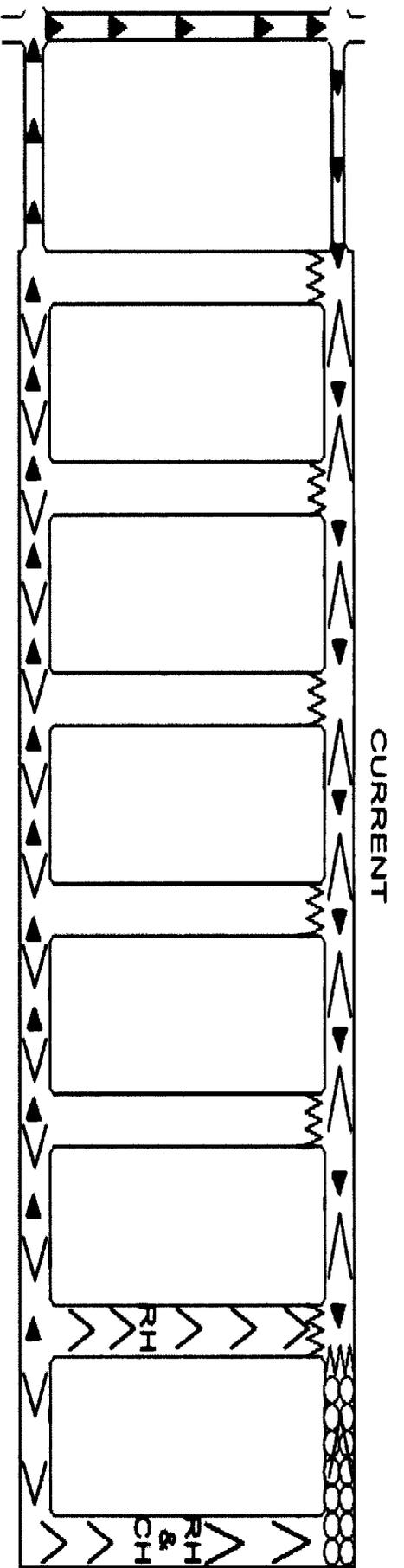
- The changes in this Permit Modification Request are the following:
 - Add a definition for a “filled room”
 - Add clarifying language to indicate that 35,000 scfm is required for worker entry into a room that is adjacent to a filled room thereby removing an inconsistency between Attachment A2 and Attachment O
 - 35,000 scfm must be maintained when workers enter Room 7 of any panel when CH TRU mixed waste is being disposed
 - Provide an exception to this requirement for restoring normal ventilation in a room adjacent to a filled room
 - Revise the 7 day notification to annual reporting

Update Ventilation Language

- **Basis**
 - This change is requested to reduce the exposure of workers to emissions from disposed waste containers
 - The NMED administrative record supports maintaining adequate ventilation (35,000 standard cubic feet per minute) to protect workers from exposure to harmful concentrations of VOCs in rooms adjacent to filled rooms
 - The PMR is consistent with the NMED VOC exposure modeling for workers in the underground
 - The disposal unit is operated in accordance with ventilation requirements imposed by the Mine Safety and Health Administration to ensure worker safety
 - High concentrations of VOCs are unlikely to occur in the RH TRU mixed waste rooms

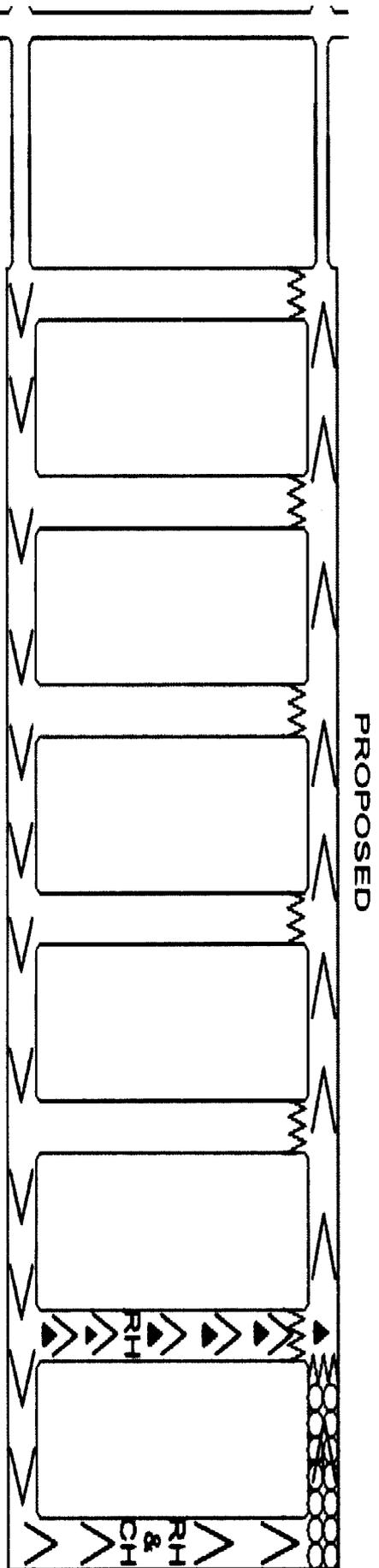
Update Ventilation Language

- Propose that workers are permitted to enter active rooms that are not adjacent to a filled room with ventilation $< 35,000$ scfm in order to perform activities such as geomechanical monitoring, adjusting ventilation regulators, perform ground control inspections, or RH equipment maintenance.



CURRENT

- LEGEND**
-  Intake air
 -  Exhaust air
 -  Ventilation Controls
 -  Worker Travel Path



PROPOSED

EM Environmental Management

safety ❖ performance ❖ cleanup ❖ closure

Addition of a Shielded Container

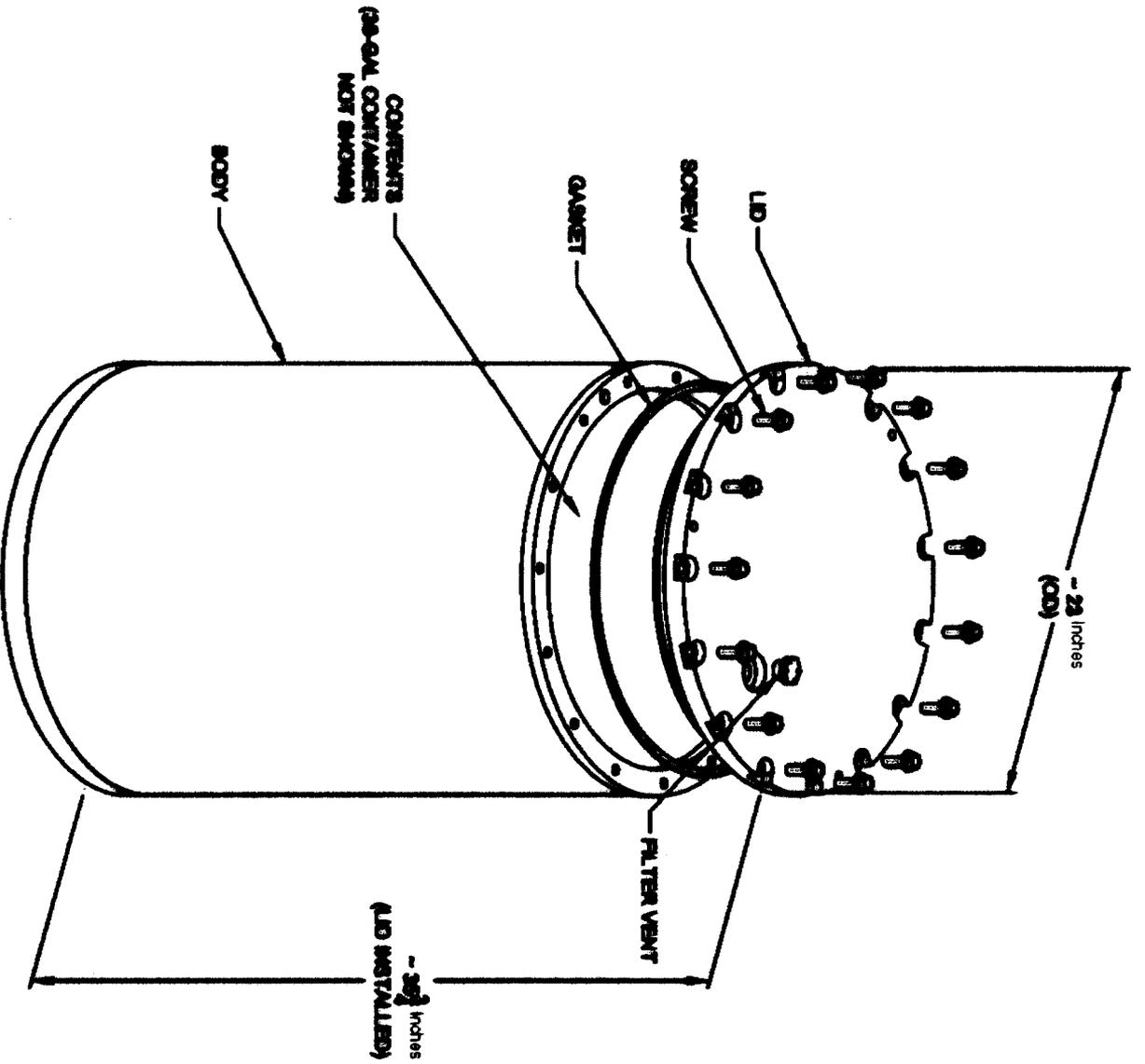
- The Permittees are submitting this PMR as a *Class 2 modification* as specified in Item F.3.b of Appendix I in 20.4.1.900 NMAC (incorporating 40 CFR 270.42) which states: “*Storage of different wastes in containers,....That do not require additional or different management practices from those authorized in the permit.*”

Addition of a Shielded Container

- Basis
 - This new container design allows RH TRU mixed waste to be managed as CH TRU mixed waste since the external surface dose rate is below 200 millirems per hour.
 - This change does not require the use of specialized emplacement equipment
 - The shielded container is an approved DOT 7A container and approved by the NRC for shipment in the HalfPACT.

Addition of a Shielded Container

- The changes in this PMR are the following:
 - Addition of a new gamma shielded container for managing RH TRU mixed waste
 - This waste will be managed as CH TRU mixed waste, but will be counted towards the allowable RH TRU mixed waste repository limit



EM ENVIRONMENTAL MANAGEMENT

safety ❖ performance ❖ cleanup ❖ closure

Revise the WIPP Groundwater Detection Monitoring Program

- The NMED provided prior approval of the classification with the approval of the Groundwater Permit Modification Work Plan.
- The Permittees are submitting this PMR as a *Class 2 modification* as specified in Item C.5.b of Appendix I in 20.4.1.900 NMAC (incorporating 40 CFR 270.42) which states: “*Changes in the indicator parameters, hazardous constituents, or concentration limits (including ACLs):...b As specified in the detection monitoring program.*”

Revise the WIPP Groundwater Detection Monitoring Program Plan

- These changes are being made in accordance with the Groundwater Work Plan approved by NMED on August 5, 2011.
- The changes in this PMR are the following:
 - Identify Culebra wells that are used for density and water level measurements
 - Clarify the need for and use of various procedures
 - Remove Total Organic Halogen as a parameter
 - Clarify serial sampling requirements
 - Change frequency of groundwater sampling from semi-annual to annual

Revise the WIPP Groundwater Detection Monitoring Program Plan

- Provide an annual Potentiometric Surface Map
 - Including the methodology employed.
- Change water level reporting requirements from ~~semi-annual to annual~~. *monthly to semi-annual*
- Revise Permit to remove confusing and ambiguous language.
- Update with current information.
- Basis
 - This PMR is required to comply with the Groundwater Work Plan approved by NMED on August 5, 2011, and to make the Permit current and consistent.

References

- All references that are subject to the Permit Modification are located in the Information Repository under Class 2 Permit Modifications.

<http://www.wipp.energy.gov/library/InformationRepository.htm>

Comments?

- Written comments for the record must be sent to the NMED contact person 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, NM 87505

Phone: 505-476-6049 FAX: 505-476-6060

E-mail: timothy.hall@state.nm.us

- Any questions or comments to the Permittees please send no later than November 28, 2011:

Mr. Bobby St. John

P.O. Box 2078

Carlsbad, NM 88220