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.
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
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.
- 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.

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