



From: Kliphuis, Trais, NMENV
Sent: Wednesday, December 28, 2011 11:38 AM
To: 'rick.chavez@wipp.ws'
Subject: FW: Proposed Ventilation Language

Importance: High

From: Kliphuis, Trais, NMENV
Sent: Tuesday, December 27, 2011 12:01 PM
To: 'Basabilvazo, George - DOE'
Cc: Kieling, John, NMENV; Davis, Jim, NMENV; 'McCauslin, Susan - DOE'
Subject: Proposed Ventilation Language
Importance: High

Hi George,

I tried to call to discuss this but I think you said you are on leave part of this week. I wanted to get this idea out so I drafted it as an email. Whenever you have a chance, let's talk about this. Susan, if you have thoughts, I am available all day.

After reviewing SRIC's comments regarding the updated ventilation language, I have developed a proposal that may satisfy both parties.

SRIC's concern focused on worker safety and specifically states "any modifications to the Permit regarding ventilation should be minimal and necessary and not result in workers being allowed to emplace CH or RH waste in rooms when ventilation is less than 35,000 scfm".

The proposed language specifically excludes active RH waste rooms from this ventilation requirement.

"The Permittees shall maintain a minimum running annual average mine ventilation exhaust rate of 260,000 scfm and a minimum room ventilation rate of 35,000 scfm when workers are present in the active room adjacent to the filled room or in Room 7 of any panel when CH TRU mixed waste is being disposed, as specified in Permit Attachment A2, Section A2—2a(3)..."

As I read the proposed language, the ventilation requirement only applies to active rooms if they are adjacent to a filled room (or Room 7). Therefore, RH active rooms would be exempt from the ventilation requirement and SRIC's concern is very valid. As written, RH waste handling and emplacement could occur without the RCRA ventilation. (As discussed previously, relying on another regulatory agency's lower minimum ventilation requirements in a RCRA Permit is not appropriate.)

As I understand, the need for the modification is to allow workers to enter the RH room to adjust levers to set the ventilation rate. The PMR states:

"Specifically, this modification makes it acceptable for a worker to enter a RH TRU mixed waste room with less than 35,000 scfm as long as that room is not adjacent to a filled CH TRU mixed waste room and RH waste handling is not under way in the room. Using the RH TRU mixed waste room to access the ventilation control louvers shortens the travel path for workers and minimizes the amount of time that must be spent in the exhaust drift."



Therefore, I do not believe it was the intent of the applicant to broaden the ventilation exemption to the RH rooms for all times (when emplacement is occurring) and the language can be modified to address the citizen concern and allow the exemption that is truly needed. Is this correct?

If so, one possible solution would be to modify the proposed definition of "Active Disposal Room" by distinguishing between the two types of active rooms. Specifically, have a definition for Active CH Room and "Active RH Room" where the RH active room was only active if RH waste is not fully emplaced and capped. Then, adjust the proposed language to specify the ventilation for both types of active rooms. E.g.

"The Permittees shall maintain a minimum running annual average mine ventilation exhaust rate of 260,000 scfm and a minimum room ventilation rate of 35,000 scfm when workers are present in the CH active room, RH active room or in Room 7 of any panel when TRU mixed waste is being disposed, as specified in Permit Attachment A2, Section A2— 2a(3)..."

I am sure there are other ways of clarifying this and of course the Dept will consider other proposals. Please let me know your thoughts.

Trais Kliphuis
WIPP Staff Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive E, Building 1
Santa Fe, New Mexico 87505

Office: 505-476-6051
Fax: 505-476-6060
Front Desk: 505-476-6000

Practicing "good will to all" this holiday season.