

Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Tuesday, March 20, 2012 7:49 AM
To: Allen, Pam, NMENV
Subject: FW: Draft Class 1 PMN Clarification on AK Compilation

WIPP file

From: Kliphuis, Trais, NMENV
Sent: Thursday, February 09, 2012 3:31 PM
To: Maestas, Ricardo, NMENV; Holmes, Steve, NMENV; Hall, Timothy, NMENV; Conniewalk@aol.com
Subject: FW: Draft Class 1 PMN Clarification on AK Compilation

From: Chavez, Rick - RES [<mailto:Rick.Chavez@wipp.ws>]
Sent: Thursday, February 09, 2012 2:20 PM
To: Kliphuis, Trais, NMENV
Cc: McCauslin, Susan - DOE; Kehrman, Bob - RES; Day, Karen - RES
Subject: RE: Draft Class 1 PMN Clarification on AK Compilation

Trais:

The broadest categorization of TRU mixed waste is by waste summary category group (Permit Attachment C, Section C-0a). There are three waste summary category groups described in the Permit that represent the final physical form of the waste: Homogenous Solids (\$3000), Soil/Gravel (\$4000), and Debris Waste (\$5000).

Characterization requirements for individual containers of TRU mixed waste are delineated on a waste stream basis, which is the most specific categorization of the waste. A waste stream is defined as waste that not only has common physical form, but also contains similar hazardous constituents and is generated from a single process or activity. Acceptable knowledge is used to define waste streams, and consequently, the acceptable knowledge information is compiled on a waste-stream basis. The subsequent characterization activities that will be conducted for each waste stream are determined by which broad waste summary category group it belongs to, as described in Section C-3 and Table C-5 of the Permit.

The revisions proposed in the subject PMR are clarifications because it is not the intent of the Permittees to continue to manage, store, or dispose of any TRU mixed waste with deficiencies in the AK compilation process, whether the observed deficiencies are isolated to one waste stream, are associated with multiple waste streams within a single waste summary category group, or are associated with multiple waste streams belonging to more than one summary category group. Furthermore the provision for suspending shipments for summary category groups isn't appropriate at a re-certification audit because the auditors are evaluating compilation of AK on a waste stream basis and not on a summary category group basis. For this reason, it is being proposed that the provisions of the permit clarify that if CARs are issued against a specific waste stream or waste streams, the corrective action process adequately identifies all affected waste streams through the evaluation of the extent of the condition(s). Depending on the results of this process, the proposed permit provisions could be more or less stringent than currently stated because the extent of condition evaluation may identify waste streams from more than one summary category group. However, the actions taken by the Permittees, as described in the proposed revisions, are more comprehensive than currently stated and more accurately define the intent of the Permittees. Regardless of how the wording appears (more stringent or less

stringent), the process will result in the correct waste stream(s) being identified and shipments suspended when appropriate.

Rick Chavez, Manager
WTS LLC Regulatory Compliance Department
Contractor to the Department of Energy
4021 National Parks Highway MS GSA-109
Carlsbad, NM 88220
575-234-7405

From: Kliphuis, Trais, NMENV [<mailto:trais.kliphuis@state.nm.us>]
Sent: Thursday, February 09, 2012 9:10 AM
To: Chavez, Rick - RES
Cc: McCauslin, Susan - DOE; Kehrman, Bob - RES
Subject: RE: Draft Class 1 PMN Clarification on AK Compilation

Hi,

Could you clarify what the difference is between
"summary waste category" and "waste stream" and how/why changing this is considered clarification?

Management, storage, or disposal of ~~the subject~~ the affected waste ~~summary category~~ stream(s) at WIPP will not resume until DOEs find that all corrective actions have been implemented and

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

From: Chavez, Rick - RES [<mailto:Rick.Chavez@wipp.ws>]
Sent: Wednesday, February 08, 2012 4:57 PM
To: Kliphuis, Trais, NMENV
Cc: McCauslin, Susan - DOE; Kehrman, Bob - RES
Subject: Draft Class 1 PMN Clarification on AK Compilation

Trais:

Attached is the draft permit modification to clarify language pertaining to acceptable knowledge compilation. This was drafted per the meeting we had in December on this subject. Your input on classification and content are appreciated.

Thanks,

Rick Chavez, Manager
WTS LLC Regulatory Compliance Department
Contractor to the Department of Energy
4021 National Parks Highway MS GSA-109
Carlsbad, NM 88220
575-234-7405