



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
SEP - 5 2012



ENTERED



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

Subject: Review of Advanced Mixed Waste Treatment Project Change Notice #2 for Waste Stream Profile Form Number BN510.1

Dear Mr. Kieling:

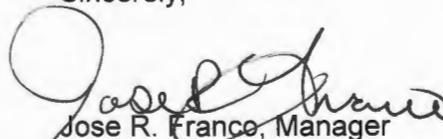
The Department of Energy, Carlsbad Field Office has approved the *Update for the Waste Isolation Pilot Plant (WIPP) Operating Record (Change Notice #2) for Waste Stream Profile Form Number BN510.1, Supercompacted Debris Waste*, for the Advanced Mixed Waste Treatment Project (AMWTP).

Enclosed is a copy of the change notice as required by Section C-5a of the Waste Isolation Pilot Plant, Hazardous Waste Facility Permit, No. NM4890139088-TSDF.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my 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 my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have questions, please contact Mr. J. R. Stroble, Director of the Office of the National TRU Program, at (575) 234-7313.

Sincerely,


 Jose R. Franco, Manager
 Carlsbad Field Office

Enclosure

cc: w/enclosure
 S. Holmes, NMED *ED
 T. Kliphuis, NMED ED
 RCRA Chronology Record ED
 WIPP Operating Record ED
 CBFO M&RC
 *ED denotes electronic distribution

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Update for WIPP Operating Record (Change Notice #2) Supercompacted Debris Waste (BN510.1)

Please add the following information to the WIPP Operating Record for Waste Stream Profile Form (WSPF) BN510.1. This waste stream is Supercompacted Debris Waste and was approved by DOE/CBFO on September 10, 2010. Change Notice #1 for BN510.1 was approved by CBFO on January 31, 2012.

This WSPF is being revised. The WSPF components are bolded. The updates are:

1. WSPF Form-1195, Date of Audit report approval by NMED

Added additional audit approval date May 24, 2012.

2. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.4.1, Areas of Operation

Add the following paragraph to Section 1.4.1 immediately following the bullets, prior to the final paragraph.

The boxed waste includes six-drum overpacks (SDOPs containing up to six 55- or 85-gallon drums), The SDOPs are of two types. One type is packaged with characterized debris drums for processing in AMWTF. These contain drums with IDCs confirmed by RTR to be acceptable feedstock waste. The other type is packaged with drums that are not characterized but are labeled with historical AK information that indicates acceptable feedstock waste.

3. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.4.3, Waste Generating Process

Replace the second paragraph of Section 1.4.3 with the following: "Debris waste feedstock drums (e.g., 55- or 85-gallon drums) that require repackaging are introduced into the DWPG. Boxes of waste, including SDOPs, are introduced into a boxline for sorting and repackaging into 55-gal drums. The SDOPs with uncharacterized drums undergo RTR to confirm the waste is >50% debris in each drum. The drum contents are then visually examined in the boxline trough to confirm the waste is approved feed stock. The other boxed wastes undergo RTR to confirm the waste form is approved feed stock. Certified VE is performed on the waste processed in the boxline as IDC BN-508. Prohibited items are processed in the boxline or special-case waste (SCW) glovebox. After treating, sorting, and/or removal of prohibited item(s), the waste is repackaged into 55-gallon drums as IDC BN-508.^(10, 11, 47) No campaigning of feedstock type or generator site debris waste feedstock occurs during the supercompaction process. There is no cleanout of the boxline(s) except for periodic housekeeping. Repackaged waste drums and direct feed drums (not requiring repack) are fed into the Supercompactor."

Update for WIPP Operating Record (Change Notice #2)
Supercompacted Debris Waste (BN510.1)

4. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Appendix A, Supercompactor Debris Waste Feedstock, Heterogeneous Waste Type.

Modify Appendix A under the Combustibles Waste Type to include IDCs RF-430 and RF-431 and under the Heterogeneous Debris Waste Type to include IDCs BN-510, BN-550, and RF-241. These portions of the table now read:

COMBUSTIBLES	RF	010	Paper & Rags
	RF	020	Wood & Benelex
	RF	030	Plastic
	RF	040	Rubber
	RF	33A	WIPP Experimental Test Program (WETP) Bin Program-Combustibles A (IDCs 335, 336, 337 and 339)
	RF	33B	WETP Bin Program – Combustibles B (IDCs 330, 337, and 339)
	RF	302	Benelex® and Plexiglas®
	RF	330	Paper and Rags-Dry
	RF	336	Paper and Rags-Moist
	RF	337	Plastic, Teflon®, Washables, PVC
	RF	339	Leaded Rubber Gloves and Aprons
	RF	430	Unleached Ion Column Resin
	RF	431	Leached Resin
	RF	460	Washables, Rubber, Plastic
	RF	463	Leaded Rubber Gloves and Aprons
	RF	464	Benelex® and Plexiglas®
	RF	833	Plastics, TRU Mixed
	RF	831	Dry Combustibles
	RF	832	Wet Combustibles
	RF	900	Low specific activity (LSA) Paper, Plastics, Etc.
RF	970	Wood	

HETEROGENEOUS	BC	201	Non-combustible solids
	BC	202	Combustible Solids-Paper/Cloth
	BN	508	AMWTP Newly Generated Debris
	BN	510	Supercompacted Debris
	BN	550	Supercompacted Debris (BN510.1)
	MD	801	Rags, Paper, Wood, etc.
	MD	802	Dry Box Gloves & O-Rings
	MD	803	Metal, Equipment, Pipe, Valves, etc.
	MD	804	Plastic, Tygon□, Mani-Boots, etc.
	MD	805	Asbestos Filters
	MD	810	Glass, Flasks, Sample Vials, Etc.
	MD	813	Glass Filters and Fiberglass
	MD	814	Graphite Waste
	MD	824	Equipment Boxes, Non-combustible
	MD	825	Equipment Drums, Non-combustible
	MD	826	Equipment Boxes, Combustible
	MD	827	Equipment Drums, Combustible

Update for WIPP Operating Record (Change Notice #2)
Supercompacted Debris Waste (BN510.1)

	MD	838	<10 nCi/g Non-combustible
	MD	847	Low Specific Activity (LSA) <100 nCi/g Combustible
	MD	848	LSA <100 nCi/g Non-combustible
	RF	241	Americium Process Residue
	RF	372	Grit
	RF	374	Blacktop, Concrete, Dirt, and Sand
	RF	750	Pits 11 and 12 Debris
	RF	760	Pad 1 Cells 1 and 2 RF Debris
	RF	950	LSA Metal, Glass, etc.
	RF	960	Concrete, Asphalt, etc.
	RL	712	Hanford Plutonium Finishing Plant Debris
	RL	714	Hanford Radiochemical Processing Lab 325 Bldg Debris
	RL	716	Hanford 231-Z Building Debris

Reason/Justification for Changes

Item 1.

WSPF, Form-1195, the audit report approval dates were updated to reflect the most recent approval date.

Item 2.

AK Summary Report, Section 1.4.1, Areas of Operation, was updated to describe the two types of SDOPs introduced into the boxline as supercompactor feed.

Item 3.

AK Summary Report, Section 1.4.3, Waste Generating Process, was updated to reflect a revised process flow for SDOPs. At retrieval, the historical AK information listed on the container is entered into the WTS. The historical information includes the generator, and waste type (IDC). If the container information identifies the waste as an approved feedstock IDC, then it is acceptable for uncharacterized SDOP building. Uncharacterized SDOPs are built from specific approved feedstock IDCs. Prior to loading, individual containers will not require RTR/VE and NDA. However, the SDOP will undergo RTR to confirm that each container's contents are greater than 50 percent debris. The SDOPs will be sent to the boxline for processing where visual examination will confirm that the waste type of each container in an SDOP is approved feed stock. The process for SDOPs created with RTR certified containers is unchanged. A certified VE is performed on the repackaged waste from the boxline to confirm the waste as a BN-508.

Item 4.

AK Summary Report, Appendix A, Supercompactor Debris Waste Feedstock, Heterogeneous Waste Type, was updated to include the IDCs RF-241, RF-430, RF-431, BN-510 and BN-550. IDCs BN-510 and BN-550 represent supercompacted debris from waste streams BN510 and BN510.1, respectively. Including them as approved feedstock allows poorly compacted 100 gallon containers or other supercompaction errors to be efficiently reprocessed.

Update for WIPP Operating Record (Change Notice #2)
Supercompacted Debris Waste (BN510.1)

The changes submitted in this change notice do not affect the waste stream designation, assignment of EPA hazardous waste numbers, or the waste matrix code as identified in the previously approved waste stream profile form.

Update for the WIPP Operating Record (BN510.1) certification

I hereby certify that I have reviewed this Update for WIPP Operating Record, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.



Signature of TRU Programs Manager

Sue Peterman, TRU Programs Manager
Printed Name and Title

7/31/12
Date