

FW: Notification of Class 1 Permit Modification to the Waste Isolation Pilot ...

Kliphuis, Trais, NMENV

Sent: Thursday, December 20, 2012 8:10 AM

To: Allen, Pam, NMENV

Cc: Maestas, Ricardo, NMENV; Holmes, Steve, NMENV



ENTERED

For the record, thnx

From: Conniewalk@aol.com [mailto:Conniewalk@aol.com]

Sent: Wednesday, December 19, 2012 11:11 PM

To: Kliphuis, Trais, NMENV

Cc: conniewalk@aol.com

Subject: Re: Notification of Class 1 Permit Modification to the Waste Isolation Pilot ...

Hi Trais

My thoughts are presented below .

thanks
Connie

Item 1: Agree with your modification suggestion, as it ensures the CMRO is onsite while performing stated monitoring duties.

Item 2: The modification is minor. It also appears that the modification wasn't necessary given the current permit language; the term "such as" is used followed by a listing, which infers the items mentioned after the phrase are examples rather than a complete listing. As such, PMR Item 2 is consistent with Class 1 requirements because it just clarifies that they do not intend to use PVA, even though the changed language doesn't necessary rule out its use in the future.

Item 3: The modification changes the emergency response reporting requirements. According to 40 CFR Part 272, changes in emergency response procedures is a Class 2 PMR, but if it is assumed that the reporting changes reflect actual practice and therefore clarify an error in the permit without intentionally modifying current report requirements, this could be a Class 1 change (typographical-type error). Other Item 3 changes are Class 1 modifications.

Item 4: No comment, assuming that Trailer 911F was no longer necessary and isn't associated with any other permit modules or Attachments.

Item 5: The modification proposed does not fall neatly into the Contingency Plan Class 1 changes described in 40 CFR Part 272. However, the proposed change also does not constitute changes in emergency procedures and equipment associated with Class 2 changes. The modification proposes changes as to how the Contingency Plan is distributed and removes requirements that the Contingency Plan be placed in specific locations. So long as the Plan is provided to NMED and those who need it, modification of where the plan is stored does appear to be a minor change.

Item 6: No comment.

Item 7: The modification adds emergency equipment (mine page phone location), addresses a typographical omission (pump rating language), and changes language that infers "contamination" by contact with chemicals (without changing the requirements associated with use of the Emergency Shower". These changes are consistent with Class 1 requirements.

In a message dated 12/19/2012 11:26:58 A.M. Mountain Standard Time, trais.kliphuis@state.nm.us writes:

Ok, thanks. Hope you stay warm.

From: Conniewalk@aol.com [mailto:Conniewalk@aol.com]

Sent: Wednesday, December 19, 2012 11:26 AM

To: Kliphuis, Trais, NMENV

Subject: Re: Notification of Class 1 Permit Modification to the Waste Isolation Pilot ...

Hi Trais

I agree with your suggestion; I'm in the process of looking through this and will get back to you later today, if that's OK. Assuming we don't lose power here-- we are FINALLY getting a big snowstorm, but that typically results in power losses!

Onward!
Connie

In a message dated 12/19/2012 11:15:25 A.M. Mountain Standard Time, trais.kliphuis@state.nm.us writes:

Hi Connie,

I am hoping to issue this on Friday. Do you have any thoughts?

I did not agree with the D-4a(1) change and am going to suggest adding the phrase "within the facility restricted area". Let me know if you agree (or disagree).

Thanks.



121225

From: Kiphuis, Trais, NMENV

Sent: Thursday, December 13, 2012 10:43 AM

To: Conniewalk@aol.com

Subject: FW: Notification of Class 1 Permit Modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

When you have a chance, please review this and let me know if you agree that the changes can be made as a Class 1. Thanks.

From: Cass, Ashley - eXcel [ashley.cass@wipp.ws]

Sent: Wednesday, December 12, 2012 3:34 PM

To: Kieling, John, NMENV

Cc: Kiphuis, Trais, NMENV; Davis, Jim, NMENV; ConnieWalk@aol.com

Subject: Notification of Class 1 Permit Modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Please see the attached correspondence. If you have any questions, please contact Mr. George T. Basabilvazo at (575) 234-7488.

Thank you

Ashley N. Cass, Administrative Assistant

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