



ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221



FEB 26 2013

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 #3
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 #3) 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



Update for WIPP Operating Record (Change Notice #3) 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. Change Notice #2 for BN510.1 was approved by CBFO on September 5, 2012.

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

1. WSPF Form-1195, Title, version, number, and date of documents used for WAP Certification

Update the following procedures:

Certification Plan for INL Transuranic Waste, MP-TRUW-8.1, Rev. 22, September 12, 2012.

Quality Assurance Project Plan, MP-TRUW-8.2, Rev. 16, June 14, 2012.

2. WSPF Form-1195, Required Waste Stream Information

Add: reference 23 to Material inputs or other information identifying chemical/radionuclide content and physical waste form

3. WSPF Form-1195, Required Waste Stream Information

Add as a footnote to line item: Which Defense Activity generated the waste:

The debris waste identified as feedstock to the AMWTP Supercompactor originated from various defense-related sources that include: weapons activities including defense inertial confinement fusion processes or activities, defense nuclear waste and material by-products management, defense nuclear waste and materials security and safeguards and security investigations, Naval reactors development, defense research and development and defense nuclear material production. Currently the largest contributing debris feedstock is associated with debris wastes generated from defense-related weapons activities associated with one or more of the six U.S. Department of Energy (DOE) sites.

4. WSPF Form-1195, Supplemental Documentation,

Add reference 23 to the line stating "Material safety data sheets"

5. WSPF Form-1195, reference list

Add new reference 23 as follows:

23. RPT-TRUW-89, Acceptable Knowledge Baseline for Argonne National Laboratory-East Waste, Rev 0, May 08, 2012

6. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), ACRONYMS

Add the following to the acronym list:

AE Argonne National Laboratory-East (prefix),
EMOP eight-drum metal overpack pallet,

Update for WIPP Operating Record (Change Notice #3) Supercompacted Debris Waste (BN510.1)

NBL New Brunswick Laboratory,
RH Remote-handled, and
SMOP six-drum metal overpack pallet.

7. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.2.11, Defense Determination for AMWTP Waste

Replace the first paragraph with the following to add "Argonne National Laboratory-East (AE)" and to address the primary defense-related waste input:

The supercompacted debris waste stream (BN510.1) generated at the Advanced Mixed Waste Treatment Project (AMWTP) is a result of compaction of waste generated at the Rocky Flats (RF), Mound (MD), Battelle Columbus (BC), Hanford (RL), Argonne National Laboratory-East (AE), and AMWTP (BN). The debris waste identified as feedstock to the AMWTP Supercompactor originated from various defense-related sources that include: weapons activities including defense inertial confinement fusion processes or activities, defense nuclear waste and material by-products management, defense nuclear waste and materials security and safeguards and security investigations, Naval reactors development, defense research and development and defense nuclear material production. Currently the largest contributing debris feedstock is associated with debris wastes generated from defense-related weapons activities associated with one or more of the following six U.S. Department of Energy (DOE) sites:

Add new fifth bullet for a total of six bullets to the first paragraph in Section 1.2.11.

- AE is a multi-disciplinary research laboratory that performs work in basic and applied science in the areas of engineering, energy technology, chemistry, physics, materials, biomedicine, and environmental studies. AE has been instrumental in the development of nuclear reactors and associated systems, materials, fuel elements, and components for use in both civilian and defense programs. This work included key participation in the development of essentially all the domestic nuclear reactor systems in use today for isotope production, power generation, and naval submarine propulsion, as well as experimental or proposed applications for weapons destruction, defense waste management, defense security and safeguards, and space propulsion. The New Brunswick Laboratory (NBL), located on the AE campus, serves as the technical extension of the U.S. DOE Office of Safeguards and Security in the areas of nuclear material control and accountability, safeguards, and nonproliferation.⁽⁵³⁾

Commingling of waste occurred at AE because waste was often generated in small volumes (i.e., less than 55 gallons) and numerous waste items were placed together in the same container either at the generator level and/or during repackaging. AE waste generators routinely commingled waste with no segregation of defense from non-defense waste. In addition, waste materials generated during the ongoing destructive examination of materials from different programs and contamination from fuel cutting/ grinding/polishing activities also occurred within the hot cell examination area.⁽⁵³⁾

AE contact-handled (CH) wastes do not contain intact irradiated fuel pin test specimens and do not contain test residues, test materials, and the resultant test fragments from the fuel pin test specimens, [including irradiated pin fragments and dispersed particulates (fines and dust)]. These wastes were managed as RH waste.⁽⁵³⁾ While AE performs research and experiments on fuel-bearing specimens, it does not possess or manage spent fuel elements. The research laboratory operations were not production operations involving the separation or reprocessing of constituent elements from reactor fuel and the CH waste does not include the high level

Update for WIPP Operating Record (Change Notice #3)

Supercompacted Debris Waste (BN510.1)

fission products. These types of wastes were managed separately as remote-handled (RH) waste. The CH debris waste is not spent nuclear fuel or high-level waste.⁽⁵³⁾

8. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.3, Waste Stream Description

Replace the first paragraph after Table 1 with the following to add "AE":

Supercompacted debris waste consists of various combustible and noncombustible debris materials that originated from multiple DOE sites (i.e., RF, MD, BC, RL, AE, and BN).⁽⁶⁾

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

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

The boxed waste includes multi-drum overpacks (SDOP, EMOP, and SMOPs) containing up to eight 55- or six 85- gallon drums). An SDOP is a six-drum overpack wood box, an EMOP is an eight-55-gallon drum metal pallet, and an SMOP is a six-85-gallon drum metal pallet. The box overpacks are of two types: 1) 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; 2) the other type is packaged with drums that are not characterized but are labeled with historical AK information that indicates acceptable feedstock waste.^(11, 32, 58, 59) Legacy retrieved boxes from the generators include Sandia steel boxes, bins, fiberglass reinforced plywood boxes and cake boxes.

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

Replace the second paragraph of Section 1.4.3.

Debris waste feedstock drums (e.g., 55- or 85-gallon drums) that require repackaging are introduced into the DWPG. Boxes of waste, including overpack boxes, are introduced into a boxline for sorting and repackaging into 55-gallon drums. The overpack boxes with uncharacterized drums undergo RTR to confirm the waste is >50% debris in each drum.^(11, 32, 59) The drum contents are then visually examined in the boxline trough to confirm the waste is approved feed stock.⁽⁵⁵⁾ The legacy retrieved 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 or potential PCB cleanups.^(54, 55, 56, 57) Repackaged waste drums and direct feed drums (not requiring repack) are fed into the Supercompactor.

11. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.4.4, Material Inputs

Replace the first and second paragraphs with the following to add "AE":

The heterogeneous debris waste feedstock to the Supercompactor originated from multiple DOE sites (i.e., RF, MD, BC, RL, AE, and BN).

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The AMWTP retrievably-stored debris waste feedstock was generated at the RF, MD, AE, and BC. The debris waste feedstock was generated during plutonium pit production; depleted uranium component fabrication; enriched uranium processing; support operations including radionuclide recovery, waste treatment, maintenance, laboratory analysis, and machining of non-nuclear weapon components; R&D; special order work; fabrication of ²³⁸Pu heat sources and manufacture of radioisotopic thermoelectric generators; D&D activities; and materials development.^(7, 8, 9, 53)

Add the following as the fifth of six bullets after the paragraph beginning “The debris waste feedstock received...”; BN will be the sixth bullet.

- AE
 - Support activities associated with the development and testing of various breeder reactor systems⁽⁵³⁾
 - Laboratory operations associated with R&D/DOE waste management and supporting the examining/evaluating of nuclear fuel⁽⁵³⁾
 - Repackaging activities⁽⁵³⁾
 - Decontamination and decommissioning activities⁽⁵³⁾
 - General Plant operations including waste management and maintenance.⁽⁵³⁾

Replace third line item of the BN bullet (now the sixth bullet) with the following:

- Waste treatment activities including size reduction of large items, supercompaction, absorption of prohibited liquids, and removal of prohibited items⁽⁶⁾

Replace the bullet items in the sixth paragraph with the following to add “AE”:

- Direct feed 55-gallon drums without rigid liners identified by generator (RF, MD, BC, AE, BN) assigned IDCs
- Direct feed 55-gallon drums with rigid liners identified by generator (RF, MD, AE, BC) assigned IDCs
- Repackaged RF, MD, BC, RL, AE, and BN debris waste from the boxline or DWPG in 55-gallon drums.

Replace the second to last paragraph with the following to add “AE” AK report RPT-TRUW-89:

The Acceptable Knowledge Baseline Document for AMWTP Waste, RPT-TRUW-06,⁽⁶⁾ was compiled to provide the AK baseline report for the AMWTP newly generated wastes in accordance with MP-TRUW-8.13, Collection, Review, and Management of Acceptable Knowledge Documentation.⁽¹³⁾ RPT-TRUW-56, Acceptable Knowledge Document for INL Stored Transuranic Waste – Rocky Flats Plant; RPT-TRUW-13, Acceptable Knowledge Document for INL Stored Waste-Mound Plant Waste; RPT-TRUW-04, Acceptable Knowledge Document for the Battelle Columbus Laboratories Building JN-4 Plutonium Laboratory; RPT-TRUW-89, Acceptable Knowledge Document for Argonne National Laboratory-East Waste; and RPT-TRUW-82, Acceptable Knowledge Document for Hanford Debris

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Waste Shipped to AMWTP, are the AMWTP baseline documents for the RF, MD, BC, AE, and RL facilities, respectively. ^(7, 8, 9, 29, 53)

Delete the last paragraph.

Non-hazardous solidification agents Aquaset[®], Aquaset II-G[®], Micro-Cel[®] E, Petroset II[®], Petroset IIG[®], or PIG[®] absorbents may be added to the waste by AMWTP to absorb prohibited liquids within debris waste. ^(38, 39, 42, 48, 49, 50)

12. AK Summary, Figure 2

Add AE AK report RPT-TRUW-89 to the box entitled "Evaluate and Compile in AK Baseline" in Figure 2.

13. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.6, Prohibited Items

Replace the third paragraph with the following to add new references:

Boxline(s) are used to VE and repackage the boxed debris waste into 55-gallon drums. Debris waste feedstock treated or examined in the DWPG, and waste from maintenance and cleanup activities, is either examined by RTR or visually examined. ^(55, 56, 57) The 55-gallon drums are non-destructive assayed. These drums of debris waste feedstock are then supercompacted and the pucks packaged into a 100-gallon product drum (IDC BN-550). ^(10, 11)

Replace the fourth paragraph with the following to add "SP-400" absorbent and new reference 52:

Prohibited items that can be treated to remove the prohibited characteristic are managed as newly generated waste. Containers with WIPP-prohibited liquids may be treated using non-hazardous solidification agents (e.g., Aquaset[®], Aquaset II-G[®], Petroset II[®] or Petroset IIG[®], Micro-Cel[®] E, PIG[®] or SP-400[®] absorbents) to render the waste acceptable prior to shipment. ^(38, 39, 42, 48, 49, 50, 52) Newly generated waste is characterized and assigned to an appropriate waste stream. ^(5, 27) In the event the treatment renders a debris waste form that can be compacted, it is included in BN510.1 as IDC BN-508.

14. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Table 3

Add to Table 3 an AE section. Add new footnote for AE F listed HWNs and re-number footnotes for RL and BN waste.

Activity	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver	Chloroform	1,4-Dichlorobenzene	1, 2-Dichloroethane	1,1-Dichloroethylene	2,4-Dinitrotoluene	Hexachloroethane	Pentachlorophenol	Vinyl Chloride	Spent Solvents	Spent Solvents	Spent Solvents	Spent Solvents	Electroplating waste
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Replace second paragraph in Toxic Substances Control Act (TSCA) Regulated Contaminants Section.

Drums of debris waste feedstock identified during RTR/VE as containing PCB items are segregated or sent to DWPG or SCW for item removal.^(1, 17, 30, 31, 35) PCB items identified in boxed debris are removed during boxline operations. Potential PCB contaminated waste identified during boxline repackaging is subject to cleanup requirements.⁽⁵⁴⁾ PCB items removed from debris waste feedstock drums and boxes and potential PCB cleanup wastes are packaged as newly generated waste and are not authorized as supercompactor debris waste feedstock.

18. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Table 4

Add the following row to Table 4.

AE	Combination WG Pu, fuels-grade Pu	²⁴¹ Pu, ²³⁹ Pu
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19. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 3.0, REFERENCES

Add references 51 through 59.

51. 49 CFR 173, Shippers – General Requirements for Shipments and Packagings
52. Material Safety Data Sheets for WaterWorks SP-400 Absorbent (MSDS-1252), WaterWorks America Inc., August 23, 2012. [P1432S]
53. RPT-TRUW-89, Acceptable Knowledge Document for Argonne National Laboratory-East Waste
54. RPT-ESH-079, Advanced Mixed Waste Treatment Facility Box Line PCB Management Plan
55. INST-FOI-20, Box Line Operations
56. INST-FOI-28, Cleanup of Dry Holdup Material from 1st Floor Cells in WMF-676
57. INST-FOI-37, Box Line Quarterly Cleanout
58. INST-OI-09, Retrieval Inspection Station Operations
59. MP-TRUW-8.45, Virtual Overpack Process and Planning

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

Modify Appendix A under the Heterogeneous Debris Waste Type to include AE IDCs AE-100, AE-101, AE-104, AE-106, AE-110, and AE-120. This portion of the Heterogeneous Debris Waste Type now reads:

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Supercompacted Debris Waste (BN510.1)**

	D004	D005	D006	D007	D008	D009	D010	D011	D022	D027	D028	D029	D030	D034	D037	D043	F001	F002	F004	F005	F006	F007	F009
Argonne National Laboratory-East⁽⁵³⁾																							
Laboratory Operations ^e
Research Generated ^e
D&D ^e
Based on AK/HSG ^e

- e. AE – D019 carbon tetrachloride, assigned to AE waste, is covered under the F001 assigned to the BN510.1 waste stream. F002 = 1,1,1-trichloroethane, 1,1,2-trichloro-1,2,2-trifluoroethane, chlorobenzene, methylene chloride, tetrachloroethylene, and trichloroethylene; F004 = nitrobenzene; F005 = benzene, carbon disulfide, isobutanol, MEK, and toluene. Due to the commingling of AE waste and management based on content codes during the early years of shipment, the applicable AE HWNs/constituents associated with AE heterogeneous debris waste are the same for all activities.

15. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.7.2, Hazardous Determination

Add “SP-400” absorbent and new reference #52 to applicable sentence listing the absorbents in the Sections 1.7.2.2 Ignitability, 1.7.2.3 Corrosivity, and 1.7.2.4 Reactivity.

Containers that are identified as having prohibited liquids may be treated using Aquaset[®], Aquaset II-G[®], Petroset II[®], Petroset IIG[®], Micro-Cel[®] E, PIG[®] or SP-400[®] absorbents to ensure that the waste is acceptable for disposal at WIPP.^(38, 39, 42, 48, 49, 50, 52)

16. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.7.2.5, Toxicity

Add changes to the following paragraphs.

Add reference 53 to the first paragraph.

Replace the second paragraph with the following to add reference 53:

The RCRA toxicity characteristic metals and organics assigned to this waste stream are: D004 (arsenic); D005 (barium); D006 (cadmium); D007 (chromium); D008 (lead); D009 (mercury); D010 (selenium); D011 (silver); D022 (chloroform); D027 (1,4-dichlorobenzene); D028 (1,2-dichloroethane); D029 (1,1-dichloroethylene); D030 (2,4-dinitrotoluene); D034 (hexachloroethane); D037 (pentachlorophenol); and D043 (vinyl chloride).^(1, 6, 7, 8, 9, 18, 29, 31, 40, 41, 43, 53)

Replace the third paragraph with the following to add AE and reference 53:

The RCRA toxicity characteristic metal HWNs: D004 (arsenic); D005 (barium); D006 (cadmium); D007 (chromium); D008 (lead); D009 (mercury); D010 (selenium); D011 (silver) were identified based on AK documentation associated with RF, MD, BC, AE, BN and RL feedstock for the BN510.1 WSPF. The D004, D005, D006, D007, D008, D009, D010, and D011 HWNs are assigned to the supercompacted debris waste stream.^(1, 6, 7, 8, 9, 29, 31, 40, 41, 43, 53)

Add new fourth paragraph:

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The HWN D019 (carbon tetrachloride) was associated with AE feedstock to the BN510.1 WSPF. Due to F-listed waste F001 was assigned to the supercompactor feedstock, the D019 HWN is not assigned but rather addressed within the F-listed waste section below.⁽⁵³⁾

Add new sixth paragraph:

The HWNs D027 (1,4-dichlorobenzene); D030 (2,4-dinitrotoluene); and D037 (pentachlorophenol) were assigned based on AK documentation associated with AE and RL feedstock to the BN510.1 WSPF. The associated toxicity characteristic HWNs D027, D030, and D037 are assigned to the supercompacted debris waste stream.^(29,40,41,53)

Replace the seventh paragraph with the following to remove D027, D030 and D037.

The HWNs D034 (hexachloroethane) and D043 (vinyl chloride) were assigned based on AK documentation associated with RL feedstock to the BN510.1 WSPF. The associated toxicity characteristic HWNs D034 and D043 are assigned to the supercompacted debris waste stream.^(29, 40, 41)

Replace the last paragraph with the following to add AE and reference 53:

The HWNs D028 (1,2-dichloroethane) and D029 (1,1-dichloroethylene) were assigned in the AK documentation associated with RF, AE and RL feedstock to the BN510.1 WSPF. The D028 and D029 HWNs are assigned to the supercompacted debris waste stream.^(18, 29, 31, 41, 53)

17. AK Summary, Supercompacted Debris Waste (RPT-TRUW-83), Section 1.7.2.6, Listed Waste

Replace third, fifth and sixth paragraphs in F-Listed HWNs Section.

The HWNs: F001 (1,1,1-trichloroethane, 1,1,2-trichloro-1,2,2-trifluoroethane, 1,1,2,2-tetrachloro-1,2-difluoroethane, carbon tetrachloride, methylene chloride, tetrachloroethylene, trichloroethylene, and trichlorofluoromethane) and F002 (1,1,1-trichloroethane, 1,1,2-trichloro-1,2,2-trifluoroethane, 1,2-dichlorobenzene, chlorobenzene, methylene chloride, tetrachloroethylene, trichloroethylene, and trichlorofluoromethane) were assigned based on AK documentation associated with RF, MD, BC, and RL feedstock to the BN510.1 WSPF. In addition, the F002 hazardous waste constituents 1,1,1-trichloroethane, 1,1,2-trichloro-1,2,2-trifluoroethane, chlorobenzene, methylene chloride, tetrachloroethylene, and trichloroethylene were assigned based on AK documentation associated with AE feedstock to the BN510.1 WSPF. Therefore, supercompacted debris waste stream is assigned the EPA HWNs F001 and F002.^(1, 6, 7, 8, 9, 29, 40, 41, 43, 53)

The HWN F004 (cresols and nitrobenzene) were assigned based on AK documentation associated with RL and AE feedstock to the BN510.1 WSPF. The resultant supercompacted debris waste retains the listed HWNs assigned to the supercompactor feedstock based on current regulatory requirements (i.e., the RCRA derived-from rule). Therefore, supercompacted debris waste stream is assigned the EPA HWN F004.^(29, 40, 41, 53)

The HWN F005 (2-ethoxyethanol, 2-nitropropane, benzene, carbon disulfide, isobutanol, MEK, pyridine, and toluene) were assigned based on AK documentation associated with RF, MD, BC, AE and RL feedstock to the BN510.1 WSPF. Therefore, supercompacted debris waste stream is assigned the EPA HWN F005.^(1, 6, 7, 8, 9, 29, 40, 41, 43, 53)

Add new reference to all paragraphs in P-, U- and K- Listed HWNs.

Add reference 53 to all four paragraphs.

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HETEROGENEOUS	AE	100	General Plant Waste
	AE	101	Cut up Gloveboxes
	AE	104	Alpha Hot Cell Waste
	AE	106	Special Source Material
	AE	110	Research Generated Waste
	AE	120	D and D Waste Compactable and Combustible Solids
	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
MD	838	<10 nCi/g Non-combustible	
MD	847	LSA <100 nCi/g Combustible	
MD	848	LSA <100 nCi/g Non-combustible	

Reason/Justification for Changes

Item 1.

Updated WSPF, Form-1195 for the following procedures:
 Certification Plan for INL Transuranic Waste, MP-TRUW-8.1, Rev. 22, September 12, 2012.
 Quality Assurance Project Plan, MP-TRUW-8.2, Rev. 16, June 14, 2012.

Item 2.

Revised **WSPF Form 1195, Required Waste Stream Information**
 to include new reference #23 for:

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“Material inputs or other information identifying chemical/radionuclide content and physical waste form”

Item 3.

Revised WSPF Form 1195, Required Waste Stream Information

Due to the various defense related activities associated with the six contributing generators, added as a footnote to line item: Which Defense Activity generated the waste: all the various defense-related activities and what the primary activity is.

Item 4.

Revised WSPF Form 1195, Supplemental Documentation

to include new reference #23 for:
"Material Safety Data Sheets"

Item 5.

WSPF, Form-1195, reference list was updated to include reference #23.

Item 6.

AK Summary Report, ACRONYMS, was updated to include the Argonne National Laboratory-East, New Brunswick Laboratory, remote-handled waste, and the new AMWTP overpack configurations.

Item 7.

AK Summary Report, Section 1.2.11, Defense Determination for AMWTP Waste, was updated to include the addition of Argonne National Laboratory-East waste as approved feedstock and to list the primary defense-related activity.

Item 8.

AK Summary Report, Section 1.3, Waste Stream Description was updated to include the addition of AE waste as approved feedstock

Item 9.

AK Summary Report, Section 1.4.1, Areas of Operation was updated to include the new overpack configurations for an EMOP and SMOP. These replace the plywood SDOP with metal pallets on which the drums are banded. The two configurations are an Eight-Drum Metal OP (EMOP) containing up to eight 55-gallon containers, and a Six-Drum Metal OP (SMOP) containing up to six 83/85-gallon containers. A description of legacy retrieved boxed waste was also added.

Item 10.

AK Summary Report, Section 1.4.3, Waste Generating Process, was updated to replace SDOP with overpack boxes for the new configurations of EMOPs and SMOPs. Added references for additional procedures related to boxline cleanup process.

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Item 11.

AK Summary Report, Section 1.4.4, Material Inputs, was updated to include the AE waste as approved feedstock and the list of processes that generated debris waste. Added process of size reduction of large items for the BN waste. Added AE to the list of generators that provide feedstock debris containers.

Item 12.

Added AE AK document RPT-TRUW-89 to text and Figure 2 to include the AE waste as approved feedstock.

Item 13.

AK Summary Report, Section 1.6, Prohibited Items, was updated to include references for cleanup activities and to include SP-400 as an approved absorbent for treatment of liquids.

Item 14.

AK Summary Report, Section 1.7, EPA Hazardous Waste Numbers, Table 3. HWN assignment by generator site, was updated to include AE as approved feedstock.. Added new footnote "e." to list the constituents associated with AE F listed waste and renumbered the footnotes.

Item 15.

AK Summary Report, Section 1.7.2, Hazardous Determination, Sections 1.7.2.2 Ignitability, 1.7.2.3 Corrosivity, and 1.7.2.4 Reactivity were updated to add SP-400 as an approved absorbent for treatment of liquids.

Item 16.

AK Summary Report, Section 1.7.2.5, Toxicity. The section was updated to include the AE waste as approved feedstock. Added text on D019 (carbon tetrachloride) associated with AE feedstock to the BN510.1 WSPF. Due to F-listed waste F001 assigned to the supercompactor feedstock, the D019 HWN is not assigned but rather addressed within F001. Added AE with RL feedstock as included in assignment of HWNs D027 (1,4-dichlorobenzene); D030 (2,4-dinitrotoluene); and D037 (pentachlorophenol) based on AK documentation. Added that the HWNs D028 (1,2-dichloroethane) and D029 (1,1-dichloroethylene) were assigned in the AK documentation associated with AE waste as well as RF and RL feedstock.

Item 17.

AK Summary Report, Section 1.7.2.6, Listed Waste, F-Listed HWNs. The section was updated to include the AE waste as approved feedstock. Added text to section regarding HWNs F002 and F004 associated with AE feedstock to the BN510.1 WSPF.

AK Summary Report, Section 1.7.2.6, Listed Waste, Toxic Substances Control Act (TSCA) Regulated Contaminants. The section was updated to include the AE waste as approved feedstock. Added text to section regarding cleanup of potential PCB contaminated waste in the box lines. Added new reference 53 to all paragraphs in P-, U- and K- Listed HWNs section due to including the AE waste as approved feedstock.

**Update for WIPP Operating Record (Change Notice #3)
Supercompacted Debris Waste (BN510.1)**

Item 18.

AK Summary Report, Section 1.8, Radionuclides. Updated Table 4, Predominant radionuclides expected in debris wastes by generator site, with AE data to include the AE waste as approved feedstock.

Item 19.

AK Summary Report, Section 3.0, REFERENCES. Updated this section with additional references cited for revising the report

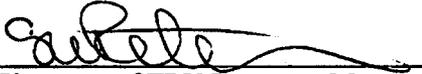
Item 20.

AK Summary Report, Appendix A, Supercompactor Debris Waste Feedstock, Heterogeneous Waste Type, was updated to include the AE waste as approved feedstock.
The IDCs added were AE IDCs AE-100, AE-101, AE-104, AE-106, AE-110, and AE-120.

The changes submitted in this change notice do not affect the total volume of waste, 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

2/18/13
Date