



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Friday, May 02, 2014 10:19 AM
To: Allen, Pam, NMENV
Subject: FW: Permit Requirements Notes from Steve Pullen
Attachments: WIPP Permit Requirements Notes.pdf

Email and att for WIPP file.

The attached notes were put together by Steve Pullen.

From: Maestas, Ricardo, NMENV
Sent: Wednesday, February 26, 2014 8:36 AM
To: Kliphuis, Trais, NMENV; Smith, Coleman, NMENV; Holmes, Steve, NMENV
Cc: Maestas, Ricardo, NMENV
Subject: Permit Requirements Notes from Steve Pullen

Attached.



Sorter
below

WPP - Compliance Issues

1.7.11.2 Report Anticipated Non-compliance.

1.10.3 Submittals - Extensions

2.3.1.1(ii) Waste Characterization Constraints

2.3.3 WAC - limits on reactive materials

2.6 Security

2.7

Inspections

All E.

E-1

- Maintenance EQ (E)
- Safety & EMR. EQ (E)
- Security Devices.
- Operational EQ.
- Structural EQ.

See Operational Procedures.

TABLE E-1 Inspection Schedules / Procedures.

- Frequency - Preparation
- Weekly.
 - Monthly
 - Continuous.
 - Annual
 - Quarterly
 - Semi-Annual
 - Daily.

to 50 feet.

important

- Central Monitor System
- Fire Detectors & Alarms
- Gas Mch.
- Power Supply
- Storm Vents

(E) TABLES 10 ABOVE & BELOW Ground (may be)

TABLE E-1a RA Waste Insp. Sched.

Does any Below-ground situation that were possible that if decayed could cause harm to G&E?

TABLE-2 Monitoring Schedule

Geomechanical ? - Monthly

Central Monitoring System - system dependent.

2.7.4 Inspection Remediation.

2.7.5 Inspection Records - provide (4)

2.10 Preparedness & Prevention

2.10.1 Required SO.

2.10.1.1 - Communications

2.10.1.3 - Emer. SO. - see Contingency Plan (4)

2.10.1.5 Spec. Backup.

i : underground automation system (4)

ii : UPS (?) monitoring systems ; alarms (4)

2.10.2 Test & Maintain SO.

What R&E waste is currently in process?

Part 3 WIPP Container Storage

3.1.1 WAB

Contact Trucks - Knote-trucks

3.1.1.2 Volume Limit.

3.1.1.4 CH Bay Surge Storage - Notice Req. (E)

Table 3.1.1 Unit Descriptions

CH Bay Storage Area, Surge Stor. Area
Demised Waste Storage Area.

24.

3.1.1.7 CH Storage Time Limit - 60 Days

3.1.1.10 BH Storage Time Limit - 60 Days.

3.1.2 PARKING AREA Container Storage Unit.

3.1.2.2 Quantity Limits ← PARKING AREA
PARKING AREA SURGE STORAGE

3.1.2.3 USE OF SURGE STORAGE

3.1.2.4 - notification

3.1.2.6 Storage Time Limit. - 59 DAYS

3.5 Container Management (Att. A-1) (E)

3.6 Containment System (Att. A-1, Sec. A1-F.)

3.7 Inspections (Att. E, Att. A-1 (E))

Part 4

DISPOSAL

4.4

VOC Limits

4.4.2

VOC Monitoring Plans

4.4.3

DISPOSAL BY VOC MONITORING.

4.5.3

operations

4.5.3.2

Ventilation

4.6

Maintenance & Monitoring.

4.6.1

Geomechanical Monitoring

4.6.1.2

Reporting

4.6.1.3

Notification of adverse cond.

4.6.2

VOC monitoring.

4.6.3

DISPOSAL BY VOC MONITORING

4.6.4

Min Ventilation Rate Monitoring

4.6.5

Hydrogen & Methane Monitoring.

4.7

Inspections - weekly

malfunctions, signs of deterioration
Discharges.

PART 5

Ground water monitoring
frequency (?)

Att. A1

Container Storage

A1-1(B)

Container markings - every 60 DAYS
(not a permit exception)

A1-1(C)

Derived waste (brief description)
Shipments stopped (reasons)

A1-1(d)(2)

Area Contamination - Applies to above ground
but might be permit to below ground.

A1-1(e)

Inspections

A1-1(f)

WHB

- USUAL AT COASTAL CIRCUIT

- MINIMUM WEEKLY - WHEN MOVEMENT

(A)

PARKING AREA

- MINIMUM WEEKLY (when waste present)

- CH & RA PACKAGES - SPREAD EVERY 60 DAYS

- MULTIPLE REFERENCES OF SHIPPING BACK
to Generator

A1-1(f)

Containment

- INSPECT WEEKLY

How much decontamination necessary below ground (?)
Does Permit ADDRESS ?

- Alt. A2 Dispose (Geologic Repository)
- A2-1 Point of Compliance (Air Emissions)
- Stacking Station VOC-A see Alt. 1) VOC monitoring per -
- A2-2a(3) Ventilation System (*)
- Electric System
- A2-5a(4) CANS WITHDRAWAL Act requirements (?)
- include (DOF support)
- A2-5 Monitoring / Inspection / Maintenance
- A2-5b Monitoring
- A2-5b(4) GW Monitoring
- A2-5b(2) Geomechanical Monitoring
- A2-5b(3) VOC Monitoring (Part 1 & Alt. N) (*)
- A2-5c Inspection

- Are the two waivers (fire / release) related?

FERNALD FFO (FINAL FINDINGS $\frac{1}{2}$ ORDER) (Oct 1995)

- OHIO EPA
- ALL PARTIES AGREE
- Site Treatment Plan (STP) Amendment.
 - Remediation wastes - to be treated (versus legacy waste)
 - Compliance Dates
 - Annual Report
 - Extensions.

TRAS' message 2/25

- DOE believes no underground monitoring is necessary
- DOE acknowledges missing inspection requirements, eg backheads, openish stations.
- DOE will stay in compliance w/ ALL SURFACE INSPECTIONS
- DOE CAN SUBMIT A PERM

| Alt D | Contingency Plan |
|---------|---|
| D-4a(1) | notification information |
| D-4b | Identification of the Materials |
| D-4c | Assessment of Nature & Extent of Emergency |
| D-4d | Control, Containment, and Correction - waste to stay in place |
| D-4d(1) | All Emergencies Continue monitoring Leaks Pressure buildup gas generation ruptures |
| D-4d(3) | Physical methods of control Expansion |
| D-4d(6) | Controls Close unfiltered ventilation |
| D-4e | Prevention of Recurrence Maintain fire etc. |
| D-4f | Management of Released Material |