



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Wednesday, December 17, 2014 4:42 PM
To: Allen, Pam, NMENV
Subject: FW: Request for Additional Extension of the Polychlorinated Biphenyl Storage Time at the Waste Isolation Pilot Plant Facility
Attachments: 14-1495 letter.pdf

May

From: Kliphuis, Trais, NMENV
Sent: Tuesday, May 06, 2014 9:24 AM
To: Allen, Pam, NMENV
Cc: Maestas, Ricardo, NMENV
Subject: FW: Request for Additional Extension of the Polychlorinated Biphenyl Storage Time at the Waste Isolation Pilot Plant Facility

Please add the attached letter to the record. Thanks.

From: Michelle Navarrete [<mailto:Michelle.Navarrete@cbfo.doe.gov>]
Sent: Tuesday, May 06, 2014 9:19 AM
To: stenger.wren@epa.gov
Cc: Thomas R Peake (Peake.tom@Epa.gov); roberts.lou@epa.gov; sales.james@epa.gov; stone.nick@epa.gov; Kieling, John, NMENV; Kliphuis, Trais, NMENV
Subject: Request for Additional Extension of the Polychlorinated Biphenyl Storage Time at the Waste Isolation Pilot Plant Facility

If you have any questions, please contact Ms. Susan McCauslin at (575) 234-7349.

*Michelle Navarrete, Administrative Assistant
ATA Services
Contractor to the Department Of Energy Carlsbad Field Office
Office of Environment, Safety and Health
P.O. Box 3090
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575-234-7191
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Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

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**NMED
Hazardous Waste Bureau**

Ms. Wren Stenger, Director
Multimedia Planning and Permitting Division
EPA Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: Request for Additional Extension of the Polychlorinated Biphenyl Storage Time at the Waste Isolation Pilot Plant Facility

Reference: EPA Region 6 Memorandum from Wren Stenger to Jose R. Franco, dated March 25, 2014, subject: U.S. Environmental Protection Agency (EPA) Region 6 Approval of Request to Expand Polychlorinated Biphenyl (PCB) Storage Time From 60 Days to 105 Days Due to Suspension of Normal Operations at the Waste Isolation Pilot Plant (WIPP) located at Carlsbad, New Mexico (EPA I.D. No. NM4890139088)

Dear Ms. Stenger:

In accordance with your letter of March 25, 2014, the Carlsbad Field Office (CBFO) of the Department of Energy (DOE) would like to request an additional extension to the Polychlorinated Biphenyl (PCB) / Transuranic (TRU) storage time at the Waste Isolation Pilot Plant (WIPP) facility. The PCB storage time requested extension would be until February 1, 2015. This additional storage time extension would make the total PCB storage time equal to one year from the initial storage of waste at the facility.

There are limited alternative storage options for the PCB waste currently in storage at the WIPP facility. These limitations are due in part to the PCB and the radiological characteristics of the waste. Three options that were identified and are currently being evaluated include:

1. Continue to store the waste at the WIPP facility.
2. Ship the waste to the Waste Control Specialists (WCS) facility in Andrews, Texas, for temporary storage.
3. Return the waste to the generator/storage sites.

The preferred option at this time is to continue to store the waste at the WIPP facility. This option minimizes risk to human health and the environment as the waste will not need to be handled, moved, or transported to another location. There is no additional hazard or cost associated with storing the waste at the WIPP facility. Additionally, the WIPP facility is permitted for this unique waste and is a secured facility. Storage area inspections are being conducted weekly as required, and the surface storage areas have not been affected by the recent fire and radiological events at the WIPP facility.

MAY 06 2014

Ms. Wren Stenger

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The second option, shipping the waste to the WCS facility in Andrews, Texas, is not a viable option at this time for the PCB waste currently in storage. Only a small quantity of the waste (approximately 4 of the 19 shipments) currently in storage in the Waste Handling Building (WHB) at the WIPP facility may meet the WCS waste acceptance criteria and would qualify for shipment to that facility. These four shipments do not contain PCB TRU mixed waste.

The third option, returning the waste to the generator/storage sites, is not an immediately available option at this time due to the complexities of arranging interstate shipments and meeting state agreements. There is also the potential for increased risk to human health and the environment resulting from additional handling and return transportation of the waste.

Currently, the CBFO cannot project a date when limited or normal waste disposal operations may resume. Continuing waste storage at the WIPP facility is the only immediately viable option at this time. The waste currently in storage at the WIPP facility is being appropriately managed and inspected as per the PCB Conditions of Approval of May 21, 2013, and the additional conditions set forth in your letter of March 25, 2014, thus minimizing any impacts to human health and the environment. Therefore, the CBFO is requesting the additional storage time for the waste currently held at the WIPP facility in the PCB/TRU and PCB/TRU mixed waste storage locations. This additional storage time will expire on February 1, 2015. If additional storage time is needed, an additional request will be made prior to February 1, 2015.

If you have any questions, please contact Ms. Susan McCauslin at (575) 234-7349.

Sincerely,


Jose R. Franco, Manager
Carlsbad Field Office

cc:

T. Peake, US EPA * ED
L. Roberts, EPA Region 6 ED
J. Sales, EPA Region 6 ED
N. Stone, EPA Region 6 ED
J. Kieling, NMED ED
T. Kliphuis, NMED ED

CBFO M&RC

*ED denotes electronic distribution