



Allen, Pam, NMENV

From: Kliphuis, Trais, NMENV
Sent: Thursday, June 19, 2014 2:31 PM
To: Maestas, Ricardo, NMENV; Smith, Coleman, NMENV; Holmes, Steve, NMENV; Allen, Pam, NMENV
Subject: FW: Derived Waste Handling
Attachments: NMED Derived Waste Handling Clarification.pdf

From: Kliphuis, Trais, NMENV
Sent: Thursday, June 19, 2014 2:30 PM
To: jose.franco@cbfo.doe.gov; bob.mcquinn2@wipp.ws
Cc: George Basabilvazo - WIPPNET; 'Chavez, Rick - RES'; Anthony Stone (anthony.stone@cbfo.doe.gov); Kendall, Jeff, NMENV; Blaine, Tom, NMENV; Kieling, John, NMENV; Pullen, Steve, NMENV; LucasKamat, Susan, NMENV; Skibitski, Thomas, NMENV; 'king.laurie@epa.gov' (king.laurie@epa.gov); Stone, Nick (stone.nick@epa.gov); Tom Peake (Peake.Tom@epamail.epa.gov); Ines Triay (triayin@fiu.edu)
Subject: Derived Waste Handling

Messrs. Franco and McQuinn,

Please see the attached letter and let me know if you have any questions or concerns.

Trais Kliphuis
WIPP Staff Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive E, Building 1
Santa Fe, New Mexico 87505

Office: 505-476-6051
Front Desk: 505-476-6000





SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

2905 Rodeo Park Dr. East, Building 1
Santa Fe, NM 87505
Phone (505) 476-6000 Fax (505) 476-6060
www.nmenv.state.nm.us



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 19, 2014

Jose Franco, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Robert L. McQuinn, Project Manager
Nuclear Waste Partnership, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

**RE: CLARIFICATION TO DERIVED WASTE STORAGE
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Franco and McQuinn:

On June 18, 2014 NMED received a request for clarification from George Basabilvazo, Director, Office of Environment, Safety & Health, via e-mail, regarding the handling and storage of derived waste resulting from the filter change-out activities occurring at this time. The Permit does not address derived waste container removal and replacement into the Derived Waste Storage Area (DWSA) and address the addition of wastes during this transit.

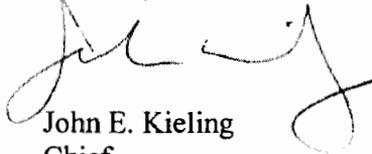
NMED understands that storage of partially filled standard waste boxes (SWBs) in the DWSA is necessary to accomplish the Bldg. 413 filter change in a safe and expedient manner. NMED has reviewed the attached procedures provided by DOE and NWP and agrees that provisions in these procedures are appropriate for use of the DWSA during filter change-out activities. NMED will however insist that the container storage time limitations within the Waste Handling Building be based on the date when the partially filled container was first placed in the DWSA. NMED also insists that container labeling reflect this initial placement. NMED recognizes that the Permittees' procedures encompass radiologic safety measures that the Permit did not anticipate

Messrs. Franco and McQuinn
June 19, 2014
Page 2

nor does it regulate. Therefore, NMED is instructing the Permittees to follow the attached procedures and utilize the derived storage area for interim storage of partially filled containers. Note that this clarification only applies to filter change-out and any other situation regarding derived waste should be discussed with NMED.

If you have any questions regarding this matter, please contact Trais Kliphuis at (505) 476-6051.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

JEK: tlk

cc: Tom Blaine, Director, NMED EHD
Trais Kliphuis, NMED HWB
Steve Holmes, NMED HWB
Ricardo Maestas, NMED HWB
Coleman Smith, NMED HWB
Steve Pullen, NMED HWB
Susan Lucas-Kamat, NMED DOEOB
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
File: Red WIPP '14