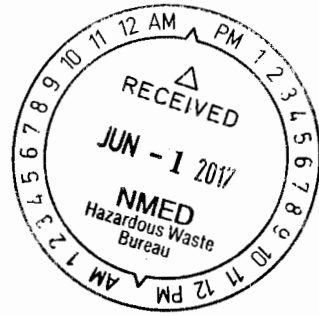




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

MAY 30 2017



Ms. Wren Stenger, Director
Multimedia Planning and Permitting Division
EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: Request for Additional Extension of Storage Time for Polychlorinated Biphenyls Transuranic Mixed Waste at the Waste Isolation Pilot Plant

Reference: EPA Region 6 letter from Wren Stenger to Todd Shrader dated June 21, 2016. **Subject:** The United States Environmental Protection Agency (EPA) Region 6 Approval of Additional Extension of Storage Time for Polychlorinated Biphenyls (PCBs) at the Waste Isolation Pilot Plant (WIPP) located at Carlsbad, New Mexico (EPA I.D. No. NM4890139088).

Ms. Stenger:

In compliance with the U.S. Environmental Protection Agency (EPA) approval letter of June 21, 2016, the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) is requesting an additional extension of the storage time for polychlorinated biphenyls (PCBs) transuranic (TRU) mixed waste currently stored in the Waste Handling Building (WHB) at the Waste Isolation Pilot Plant (WIPP) facility. Normal waste disposal operations resumed at the WIPP facility on January 4, 2017. In accordance with the conditions set forth in the EPA's June 21, 2016, letter, no new off-site generated PCB waste was received at the WIPP facility prior to the resumption of normal operations.

Prior to the resumption of waste disposal operations, the WIPP Documented Safety Analysis (DSA) was revised. The DSA Revision 5b was issued in April 2016. Chapter 18 of the DSA requires an evaluation of the waste containers residing in the Waste Handling Building (WHB), received at the WIPP facility prior to the February 2014 event. This includes an enhanced chemical compatibility evaluation and a review against the Basis of Knowledge (BoK) document to evaluate potential oxidizing chemicals in TRU mixed waste streams. The evaluation process requires CBFO concurrence with enhanced chemical compatibility evaluations and CBFO concurrence with the BoK evaluations.

The enhanced chemical compatibility evaluation and BoK evaluation have not been completed for the containers from the waste stream listed below that have been in extended storage since 2014. In order to comply with the WIPP facility DSA, the PCB TRU mixed waste containers currently in extended storage in the WHB must be screened through the BoK process prior to emplacement in the WIPP underground. It is anticipated that this screening will not be completed before expiration of the current



Ms. Stenger

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June 30, 2017, storage extension deadline. These containers are from the following waste stream:

- SR-MD-PAD1

Therefore, the DOE/CBFO requests an extension of storage time for the PCB TRU mixed waste until June 30, 2018. This request is in accordance with 40 CFR §761.65(a)(1), §761.65(a)(2), §761.75(c)(3)(ii) and section III-D of the *Disposal of PCB/TRU and PCB/TRU Mixed Waste at the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico Conditions of Approval*.

The DOE/CBFO has determined that the continued storage of this waste in the WHB minimizes risk to human health and the environment since the PCB TRU mixed waste containers are in good condition, are inspected regularly pursuant to the EPA PCB Conditions of Approval and these containers will not need to be transported to another location.

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

Sincerely,



Todd Shrader, Manager
Carlsbad Field Office

cc:

- | | |
|--------------------------|------|
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*ED denotes electronic distribution