

**NMED/DOE WIPP PART B PERMIT APPLICATION REVIEW**

**Summary of Issues**

**DRAFT WORKING MEETING NOTES**

August 27, 1992



**Participants:**

Susan Collins, NMED  
Benito Garcia, NMED  
Connie Walker, ATK  
Darrell Mercer

Greg Starkebaum, ATK  
Trey Greenwood, DOE  
Bob Kehrman, Westinghouse  
IT/Westinghouse/ASI\*

\*complete list of participants not provided

ITEM	DISCUSSION	CONCLUSIONS/FURTHER ACTIONS
Unit Definition.	DOE and Westinghouse proposed three Hazardous Waste Management Units at WIPP: Waste Handling Building, Panel 1/Room 1, and Panel 1/Room 3.	State agreed with this unit definition, as is indicates that the units are those in the subsurface and the surface Waste Handling Building
Chapter B Draft.	Discussion of provision of Draft to NMED for informal review.	DOE and Westinghouse did not indicate whether a draft would be provided for review.
Certification of Engineering Diagrams.	Discussed necessity for certification of drawings/designs by Engineers; generally a State rather than Federal Requirement.	DOE and NMED will both acquire legal interpretation of requirements.
Clarification of Chapter C cover letter.	DOE requested clarification of the NOID portion of the cover letter, as well as use of compliance schedule/permit conditions.	NMED will explain in clarification letter.
RCRA sampling.	DOE indicated that RCRA sampling for Group I entails headspace analysis and process knowledge; Group II/III includes limited sampling, statistical analysis, headspace analysis and process knowledge.	None.
Amount of detail required for process knowledge.	DOE asked for clarification regarding level of process knowledge information required by NMED. DOE believed that some of the requested information was non-RCRA related and therefore was not applicable.	NMED will explain level of detail in clarification letter, as well as RCRA vs. non-RCRA requirements.
Verification of data prior to acceptance at WIPP.	DOE has large database of information which accompanies each bin, including a 350 page data summary.	DOE indicated that it would provide NMED with an explanation of the verification process and data.

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Standard Operating Procedures (SOPs).	DOE requested clarification concerning information that must be provided relative to SOPs. NMED indicated that referencing SOPs without text discussion was not appropriate.	NMED will explain in clarification letter.
Level of detail required in data and information tables.	DOE requested clarification concerning the amount/level of detail required in the requested data tables and cross reference tables, indicating that providing individual hazardous constituents would be lengthy.	NMED will explain in clarification letter, but indicated initially that the tables must include, at a minimum, the Waste Group, Category, and Hazardous Wastes within each Category.
Use of Permit Conditions.	DOE indicated that previous state representatives had been amenable to the use of permit conditions, and requested information concerning the nature of items which will not be considered under permit conditions or compliance schedules.	NMED will clarify this issue in a forthcoming clarification letter.
TCLP issue	DOE requested clarification concerning TCLP issues. NMED indicated that the application must include discussion of why Total rather than TCLP methods are sought, including supporting information/data.	None.
General Discussion of detailed NOD comments.	Went through detailed NOD comments, including those dealing with required level of process knowledge to be provided, RCRA certification of methodologies, nature of Group III wastes (artificially created as part of Test Phase or a waste group generated during production activities).	NMED indicated that those specific comments dealing with process knowledge, etc., covered under General Comments would be explained within a clarification letter to be provided to DOE. No deadline for this clarification letter was finalized, although DOE indicated that they would like to receive the letter as soon as possible.

