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ENTERED

JUDITH M. ESPINOSA
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED



October 19, 1992

A. LaMar Trego, General Manager
Westinghouse Electric Corporation
P.O. Box 2078
Carlsbad, New Mexico 88220

Arlen Hunt, Project Manager
WIPP Project Site Office
P.O. Box 3090
Carlsbad, New Mexico 88220



Re: Waste Isolation Pilot Plant (WIPP), Part B Application:
Request for Information, Chapter(s) E, F, G, H and J

Dear Messrs Trego and Hunt,

The New Mexico Environment Department (NMED) has completed the technical review of the Part B Waste Isolation Pilot Plant (WIPP) permit application, Chapter E - Groundwater Monitoring, Chapter F - Procedures to Prevent Hazards, Chapter G - Contingency Plan, Chapter H - Personnel Training and Chapter J - Corrective Action For Solid Waste Management Units. The review indicated the need for additional information for clarification purposes. An enclosed summary of these information gaps is submitted for your attention. NMED requires a response submission on or before November 13, 1992 per Schedule, Revision 6. As stated in previous correspondence, the November 13, 1992 is the final compliance date for all Part B Chapter revisions; therefore should you choose not to submit an early response, the Request for Information detailed in this letter and any other outstanding issues remaining on November 13, 1992 will be addressed in a Notice of Deficiency to DOE/WID on December 4, 1992.

Should you have any questions regarding the information presented in this letter, please contact me or Susan Collins (505) 827-4308.



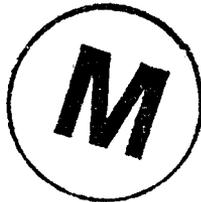
Messrs Trego & Hunt
October 18, 1992
Page Two

Sincerely,

Barbara Hoditschek

Barbara Hoditschek, RCRA Program Manager
Environment Department
Hazardous & Radioactive Materials Bureau

cc: Susan Collins, WIPP Permit Coordinator
Bob Kerman, WID
Daryl Mercer, WPIO
Connie Walker, Manager, A.T.Kearney



COMPLETENESS AND TECHNICAL REVIEW
CHAPTER E
WASTE ISOLATION PILOT PLANT
PART B PERMIT APPLICATION

GENERAL COMMENTS

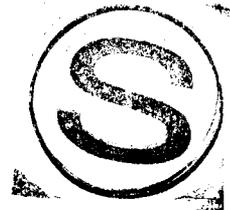
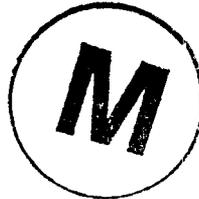
E. GROUNDWATER MONITORING

E-1 Exemption from Groundwater Protection Requirements

E-1c No Migration: 264.90 (b)(4), 264.601(a)

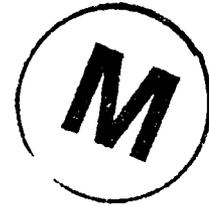
Page E-2, Lines 5 through 9

1) The application indicates that there is a very low potential for migration of hazardous constituents from the WIPP site via groundwater. Revise this section of the application to present a brief discussion on the performance standards which have been met and why groundwater monitoring is not necessary at this time.



COMPLETENESS AND TECHNICAL REVIEW
CHAPTER F
WASTE ISOLATION PILOT PLANT
PART B PERMIT APPLICATION

SPECIFIC COMMENTS



F. PROCEDURES TO PREVENT HAZARDS

F-1 Security

F-1a(3) Warning Signs: 264.14(c)

Page F-3, Line 13

1) The application indicates that there are warning signs located on the fencing enclosing Zone I. It is not clear that signs located along the fencing and entrances to Zone I provide adequate warning, due to the large number of buildings located within the fencing which do not manage hazardous wastes. Describe the other warning signs present at the locations where waste will be received, managed, and transported to the underground and the signs present in the underground waste management areas.

F-2 Inspection Schedule: 264.15, 270.14(b)(5)

F-2a General Inspection Requirements: 270.14(b)(5), 264.15(a) and (b), 264.33

Page F-3, Line 25

2) The application states that a series of manuals exists that contain all the detailed inspection procedures and forms. Referencing the location of this information is not adequate for hazardous waste-related inspections. Revise the application to specify the items or areas inspected, frequency of inspection, types of problems looked for, potential remedial actions to be taken, and provide examples of the inspection logs. Indicate the department or personnel which will routinely perform each inspection.

Page F-29

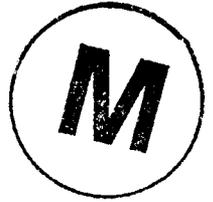
3) There are numerous items that require inspection at the facility which are not listed in Table F-1. For example, inspection of the condition of the bins and other containers within the Bin Scale Test Rooms is not included. Also not listed are: the WHB Inventory and Preparation Area; the condition of the shaft seals and sumps; the condition of standby or emergency power supplies; and above- and below-ground waste receiving and



transfer locations. Expand Table F-1 to include these areas and all others at the facility where a release of hazardous waste materials may occur. Also indicate that the location of emergency response materials will be inspected.

F-2(a)1 Types of Problems: 264.15(b)(3)

Page F-3, Line 27; Page F-4, Line 20; Page F-5, Line 27;
Page F-29 through 30



4) VOCs from the bins will be monitored underground. However, no monitoring of the bins is described within the Waste Handling Building. Provide a rationale for this approach as it appears releases from the bins will occur in the Waste Handling Building during both purging and temporary storage periods.

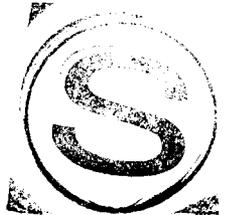
5) One potential problem not mentioned in the application is the accumulation of flammable and/or explosive gasses in test bins. According to recent discussions with DOE and Westinghouse representatives, purging of Type I bins will be required when 50% of the Lower Explosive Limit (LEL) concentration is reached. The purpose of this requirement (from the WIPP FSAR) is to prevent explosions or fires due to buildup of hydrogen and methane. Revise the application to include the planned Type I bin inspection or monitoring and purging procedures.

6) Type II bins will be allowed to accumulate higher concentrations of pressurized, flammable/explosive gasses. Provide descriptions of the types of problems (e.g., leaks) to be inspected for on Type II bins, and the equipment and procedures to be used.

F-2a(2) Frequency of Inspections: 264.15(b)(4)

Page F-6, Line 14

7) The application states that the test rooms and the separate, unidentified derived waste emplacement room will be inspected weekly. The containers are not specifically mentioned. Revise the application to address inspection of the containers themselves. Demonstrate that a weekly inspection is adequate if the materials of construction of the bin fail, leaving the waste with primary containment only, in the form of the box or RCB. Also, revise the application to consistently present information on the storage locations of derived waste. Specifically, Chapter F must be consistent with Chapter B (Revision 2) which states that derived wastes will be placed in Room 1 with test bins.



F-2b(1) Condition of Containers and Container Inspection:
264.171 and 264.174

Page F-6, Line 27; Pages F-29 through 31

8) The text and Table F-1 do not mention inspection or monitoring to determine explosive or flammable gas concentrations in and around test bins. Test bins will contain hydrogen and methane concentrations from near zero up to several percent [well above the Lower Explosive Limit (LEL)]. The bins must be monitored and inspected to ensure that purging is performed in Type I bins, as required in the WIPP FSAR, when explosive gas concentrations reach 50% of the LEL. No plans have been submitted for Type II bins. Provide inspection procedures for Type II bins that must include some method for verifying that gas leaks are not occurring, and plans for correcting leaks which do occur. Discussion in the text should address provisions for bin explosive gas concentration determinations in the WHB as well as the Bin Scale Test Rooms.

9) Describe the inspections that will be conducted of the monitoring equipment located on each container.

F-2b(8) Miscellaneous Unit Inspections: 270.14(b)(5), 264.602

Page F-7, Line 26

10) Numerous items relating to preventing explosions or releases within the Bin Scale Rooms are not identified as requiring inspection. In addition to flammable/explosive gas inspections, indicate the procedures and frequency at which load cells, extensometers, other instruments, rock bolts, and mesh will be inspected or monitored. Indicate how floor movement is inspected and recorded.

F-3b Aisle Space Requirement: 264.35

Page F-12, Line 32

11) The application states several times that sufficient aisle space is present. However, the amount of aisle space present in any particular area is not specified. Identify the amount of aisle space available in the Waste Handling Building with and without the usage of 36,000 square feet for container storage. Additionally, provide the amount of aisle space present in the Panel Rooms 1 and 3. Indicate where derived waste storage containers are stored and the effects on aisle space.





F-4 Preventative Procedures, Structures, and Equipment

F-4a Unloading Operations: 270.14(b)(8)(i)

Page F-15, Lines 3-10

12) Conflicting information regarding pallets is presented. The application states that four sets of waste containers can be managed on a pallet and that two SWBs or RCBs may be placed on a pallet for a maximum load of 7,000 pounds. It is unclear what comprises a set. If two SWBs equal one set, four sets would weigh 28,000, exceeding the pallets capacity. The direction to Figure D-17 is not informative as it illustrates the facility pallet has the capacity to contain only two SWBs. Revise the discussion of the unloading operations to include the following:

- The capacity of the facility pallet and means of keeping the bins on the pallet;
- Procedures for unloading the bins from the pallet to the stands where the bins are prepped to go underground;
- Procedures for unloading the bins from the stands to the shaft, and unloading the bins in the Rooms;
- Transference of bins from the Rooms to the WHB; and,
- Transference of the derived waste from the WHB to the Rooms.

13) Include a discussion on potential deviations from routine procedures to reflect any deviations necessary due to weight variations of the bins, stability of bins due to brine within the bins, etc.

F-4(b) Runoff: 270.14(b)(8)(ii)

Page F-15, Line 24

14) The text indicates that the WHB is a physical barrier which will prevent spills from contacting the environment. Describe those portions of the building which prevent releases to the environment from occurring.

Page F-16, Lines 1 through 13

15) The text discusses the amount of liquid to be present in the test bins. Revise the application to address the various amounts of liquid which will be present in the bins, as indicated in Chapter B, Revision 2.



Page F-16, Lines 14 through 31

16) The prevention of runoff is discussed only with respect to surface water runoff. Revise the application to describe how the shaft seals prevent "runoff" of groundwater to the waste repository level.

F-4e Personnel Protection: 270.14(b)(8)(v)

Page F-19, Line 20

17) Discuss the emissions, if any, that will result from the storage and preparation of the waste bins within the WHB. Indicate the types of personnel protection equipment that will be employed during bin preparation. (Referenced sections in Chapter D do not provide this information.)

18) Discuss the addition of brine to the bins. Indicate where this will be performed and describe the type(s) of personnel protection equipment to be required.

F-4f Releases to Atmosphere: 270.14(b)(vi)

Page F-21, Lines 11 through 28

19) Releases to the atmosphere during purging of bins in the WHB are not mentioned in the application. Provide a description of expected quantities of VOC which will be released to the Hood Ventilation System. (Referenced sections of Chapter D do not provide this information.)

F-5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste: 270.14(b)(9)

Page F-21, Line 30

20) The application indicates that the waste, waste containers, and derived waste have been demonstrated to be compatible and do not exhibit the characteristics of ignitability, reactivity or corrosivity. Although the WIPPWAC indicates that ignitable, reactive or corrosive waste will not be shipped to WIPP, extensive documentation is available concerning the expected generation of significant quantities of flammable and explosive gasses from wastes during the test phase. The available information indicates that hydrogen and methane are both expected to be generated, quite possibly in concentrations above the Lower Explosive Limit (LEL). If explosive or ignitable conditions are allowed to develop in bins during the test phase, by regulatory definition, these bins would then contain D001 and D003 wastes. According to 261.23(a)(7), a solid waste has the characteristic of reactivity if it is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.



F-5c Management of Ignitable or Reactive Waste in Containers:
264.176, 270.15(c)

Page F-23, Lines 5 through 7

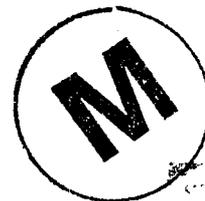
23) As discussed in Comments 20, 21, and 22, the claimed inapplicability of requirements for ignitable or reactive wastes is incorrect. Revise the discussion to acknowledge the applicability of these regulations and reference the drawing(s) showing the buffer zone.



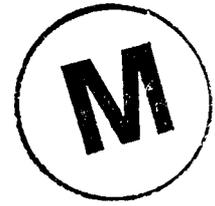
COMPLETENESS AND TECHNICAL REVIEW
CHAPTER G
WASTE ISOLATION PILOT PLANT
PART B PERMIT APPLICATION

GENERAL COMMENT

1. The contingency plan provides limited specific information on the procedures that will be followed during an emergency. Other documents are frequently referenced within the plan. The purpose of a contingency plan is to provide a "stand-alone" document which addresses all information and procedures necessary to respond to an emergency at a facility. Therefore, incorporating information by reference is not acceptable.
2. The distance between acronyms, definitions and subsequent use creates confusion to the reader. An example, the acronym FLIRT, page G-12, original definition found on page G-7 is far enough from original use to be unclear to the reader. Revise the application to link, within 2 pages, acronyms and their definitions.



COMPLETENESS AND TECHNICAL REVIEW
CHAPTER G
WASTE ISOLATION PILOT PLANT
PART B PERMIT APPLICATION



SPECIFIC COMMENTS

G. CONTINGENCY PLAN: 270.149(b)(7), 264.50 through 264.56,
264.52(b)

G-1 General Information:

Page G-2, Lines 1 through 6

1) The application indicates that wastes will be accepted from ten DOE generator sites. Revise the application to identify only those sites which will ship waste to the WIPP during the Test Phase.

Page G-2, Lines 7 through 11

2) The underground waste storage location is the only RCRA-regulated unit identified. Revise the application to also identify the Waste Handling Building as a RCRA-regulated unit.

Page G-2, Lines 8 through 11

3) The dimensions of the miscellaneous unit are identified as the entire 16-mile WIPP perimeter. Revise the dimensions of the unit to those Rooms in which waste will be stored during the Test Phase.

G-2 Emergency Coordinators: 264.52(d), 264.55

Page G-4, Line 3

4) The home addresses and phone numbers for the emergency coordinators are not provided in the application. The contingency plan must provide this information or more clearly indicate the means by which the emergency coordinators can be contacted.

Page G-4, Line 4

5) The emergency coordinator is stated to be the equivalent of the WIPP facility Crisis Manager. Provide a description of the Crisis Manager's responsibilities. Indicate if there are two individuals performing essentially the same functions, and if there are, identify the individual with final authority.



Additionally, clarify in text and provide a figure illustrating the chain of command between the emergency coordinator, crisis manager, facility manager, facility operator, shift supervisor, and office wardens.

Page G-4, Lines 12 through 17

6) The emergency coordinators are stated to be familiar with waste activities onsite. Describe the waste characterization information that will be available to the emergency coordinator and demonstrate that this information is adequate for identifying and managing hazards during an emergency. For example, if the waste is stated to contain F001 waste, the exact amount of that waste is not known. Discuss how this may impact emergency response.

G-3 **Implementation:** 264.52(a), 264.56(d)

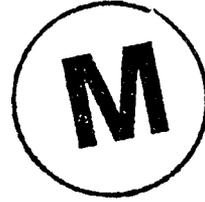
Page G-5, Lines 3 through 14

7) Revise the contingency plan to indicate that the Waste Handling Building (WHB) is a RCRA-regulated unit. Additionally, identify potential emergency scenarios that may occur at the WHB that would require the contingency plan to be implemented.

8) Sections G-1 and G-3 do not include any discussion of two possible scenarios which could lead to implementation of the contingency plan. A brief discussion of monitoring, inspections, and other procedures to minimize potential fire or explosion hazards is necessary due to the anticipated presence of pressurized flammable or explosive gasses in test bins during the test phase. A brief discussion of Bin Scale Test Room roof or "back" geomechanical monitoring and maintenance program (to prevent collapse) is also required. These plans are required under the general authority of HWMR-6, 264.15. Data from these inspections or monitoring programs may exceed safety limits and require implementation of the contingency plan, emergency procedures, or immediate remedial action [as required by 264.15(c) or 264.56(a)] even if a fire, explosion, or release has not yet occurred. Provide the "trigger" data for the monitoring programs and inspection procedures which will require the contingency plan to be implemented.

9) Provide general descriptions of the gas monitoring/explosion prevention and roof monitoring/collapse prevention programs, and explicitly discuss the emergency procedures, remedial action, and/or contingency plan procedures which would be implemented in case of leakage of explosive gas or imminent collapse of a Bin Scale Test Room roof.





G-4 Emergency Response Procedures

G-4a Notification: 264.56(a)

Page G-6, Lines 25 through 29

10) The contingency plan indicates that the CMR Operator continuously monitors alarm status. Revise the application to identify the types of alarms that are being monitored.

Page G-7, Lines 1 through 9

11) The chain of notification indicates that both the CMR operator or WIPP security may contact emergency response teams. Explain how it is determined who contacts the emergency response teams.

Page G-7, Lines 7 through 9

12) The FOSS is not identified as being identified on a call-out list. Indicate the means used to determine the FOSS. Additionally, identify where all call-out lists are maintained and the personnel responsible for updating and providing the call-out list.

Page G-7, Lines 22 through 26

13) The plan indicates that the FOSS will contact the appropriate Facility Manager. Indicate what criteria are followed to determine the appropriate Facility Manager (FM) .

Page G-7, Lines 22 through 25

14) The plan states that the FM determines if an incident constitutes a real or potential threat. Present the criteria the FM will follow.

Page G-7, 22 through 28

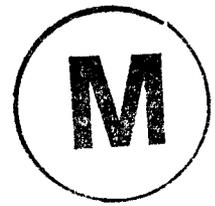
15) The plan appears to omit a step during which the FM informs the FOSS that an incident does constitute a threat. Include the procedure for this step, if needed.

Page G-9, Line 10 and Page G-10, Line 10

16) The line of notification does not include the Department of Public Safety WIPP Coordinator. Describe the role, if any, this individual plays in emergency response procedures and include this information in the application if applicable.

G-4(b) Identification of Hazardous Materials: 264.56(b)





Page G-11, Lines 2 through 16

17) The contingency plan does not appear to address a release to air within the Waste Handling Building or the underground waste management area. Discuss how releases to air (especially, but not limited to, releases of flammable or explosive gasses) will be investigated and identified.

Page G-11, Lines 2 through 16

18) It is unclear if derived waste is included in the WWIS. Revise the plan to address derived waste. Indicate how derived waste will be managed or tested to determine if gas generation will occur from the waste.

G-4c Assessment of the Nature and Extent of Emergency:
264.56(c), 264.56(d)

Page G-11, Lines 18 through 20

19) The first sentence of this section indicates that a major step in the contingency plan is not described in the plan. Identify the personnel responsible for personnel safety and the procedures that will be enacted to ensure personnel safety.

Page G-11, Lines 20 through 26

20) The text indicates that the FOSS is responsible for identifying immediate and potential hazards. However, page G-7, lines 22 through 25 indicate that the FM will determine if an actual or potential danger exists. Clarify the responsibilities of the FM and FOSS.

Page G-11, Lines 27 through 31

21) Information on the hazards associated with an incident is to be accessed through Safety and Plant Protection Department, Environmental Analysis and Compliance Department, and Transportation and Hazardous Materials Handling Department. Identify how this information is assessed and what the name represents (i.e., a document, a procedures manual, etc).

Page G-11, Line 32

22) The criteria presented for assessing the impact of an incident do not list the potential reactivity of waste materials. Revise the criteria to determine how reactive, or potentially reactive, wastes will be managed.

G-4d Control, Containment, and Correction of the Emergency:
264.52(a)





Page G-12, Lines 13 through 16

23) The text indicates that the CMR operator will contact the FOSS and appropriate emergency response personnel. Page G-7 (lines 10 through 12) indicate that the CMR operator or WIPP security will contact emergency response personnel. Revise the application to consistently present the procedures which will be followed.

Pages G-12 and G-13

24) This portion of the contingency plan indicates the personnel that will respond to an emergency, however, it does not describe how emergencies will be controlled, contained, or corrected. Revise the plan to describe how emergencies will be managed. In particular, provide information on handling a leaking Type II bin and potential collapse of a portion of the roof of a test room.

G-4f Storage and Treatment of Released Material: 264.56(g)

Page G-14, Lines 28 through 31

25) Indicate sampling and analysis procedures for hazardous waste resulting from the cleanup of a fire, explosion, or release involving nonradioactive hazardous waste at the WIPP facility and additionally, indicate procedures to transfer this waste to a predetermined site.

Page G-15, Lines 1 through 3

26) The contingency plan states that wastes will be stored at the Hazardous Waste Staging Area for transfer to an offsite facility. Revise the application to describe the Hazardous Waste Staging Area. This portion of the plan also references other documents and/or DOE procedures. Contingency plans must be "stand-alone" documents. Attach the referenced document as an appendix to the plan or incorporate the appropriate information into the text of the plan.

Page G-15, Lines 4 through 11

27) The contingency plan states that any released material comprised of mixed waste will be managed according to procedures in WP05-1. As stated above, the specific waste handling procedures must be provided within the text of the plan or as an attachment.



Page G-15, Lines 19 through 23

28) The text describes the procedures that will be followed if a spill occurs on an impermeable surface. Identify the procedures

that will be followed if material is spilled on a permeable surface.

Page G-15, Lines 24 through 26

29) The text is unclear about segregation of incompatible wastes after a clean-up event. Identify the procedures to be followed to ensure that incompatible materials will not be stored together.

G-4g **Incompatible Waste:** 264.56(h)(1)

Page G-15, Line 1

30) Revise the application to include the guidelines provided in WP 02-6 and WP 02-7. Also revise the contingency plan to indicate that materials which may be incompatible with material released will not be placed near the released material until cleanup has been completed. Indicate how this procedure will be carried out.

G-4h **Post-Emergency Equipment Maintenance:** 264.56(h)(2)

Page G-16, Lines 25 through 26

31) Describe the procedures which will be followed to ensure that all equipment is capable of operation after an emergency has occurred.

G-4i **Container Spills and Leakage:** 264.52, 264.171

Page G-16, Line 34

32) According to recent discussions with DOE and WID representatives, "wet" bins may contain more than 120 liters of brine. Correct this statement.

Page G-17, Lines 1 through 10

33) Specify the amount of time required to respond to a container spill or leak. Indicate how the spill or leakage material will be managed after cleanup.

G-6 **Coordination Agreements:** 264.52(c), 264.37

Page G-18, Line 7

34) Provide a copy of the Memorandums of Understanding with any entities the WIPP facility is associated. Provide information on how the local agencies listed on pages G-18 and G-19 are notified of the changes to the emergency call-out list mentioned on page G-4.



Page G-18

35) Indicate how offsite assistance will be managed at WIPP and the person responsible for providing direction or supervision of offsite assistance.

G-7 **Evacuation Plan:** 264.52(f)

Pages G-19, 20, and 21

36) Indicate frequency and practice of drills for surface and underground emergency evacuation.

Pages G-19, 20 and 21

37) Identify the role of office wardens and chief warden, indicate how they direct personnel, and explain their relationship to the emergency coordinator.

Pages G-19 through 21

38) Describe the procedures that will be followed to ensure that personnel working with contaminated materials will be isolated from other personnel during an evacuation. Indicate if an office warden is present with such personnel.

Pages G-19 through 21

39) Figure G-7 and the terminology used to describe evacuation are unclear. Explain the difference between assembly areas and staging areas. The staging areas are described as being offsite, yet the locations are within the WIPP facility boundaries. Clarify the use of this terminology.

G-8 **Required Reports:** 264.56(j)

Page G-22, Line 16

40) Specify the personnel of ES&H that are responsible for the submittal of reports.

Table **Tables and Figures**

Table G-1 Emergency Equipment and Personnel Maintained at the WIPP

Page G-30 ,Table G-1

41) The floor squeegee is identified as having a wooden handle. NMED questions the merit of using an absorbent material such as wood with emergency equipment designated for mixed waste clean-up. Defend the use of wood or make appropriate changes in this

and any other equipment utilizing wood components.

Page G-34, Table G-1

42) This table describes extended use of battery-powered uninterruptible power supply (UPS) as backup power source. Describe schedule and maintenance of batteries, explain "battery memory" in relation to this maintenance.

Figure G-1 WIPP Surface Structures

Page G-47

43) Figure G-1 is unclear; clearly indicate where the emergency exit(s) are.

Figure G-5 Fire Water Distribution System

Page G-51

44) Indicate what the slotted lines between the WHB and structure #465 outline.

Figure G-3 WIPP Underground Facilities

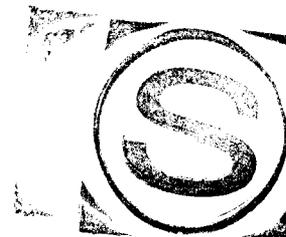
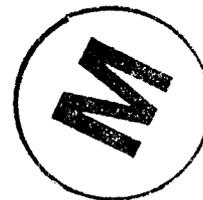
Page G-49

45) Indicate if EXPERIMENTAL AREA, top right of figure is the same as GEOTECHNICAL AREA, figure G-2. Be consistent and make appropriate changes.

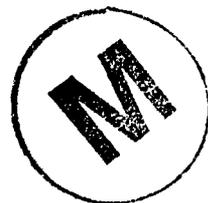
Figure G-6 Underground Fuel Area Fire Protection System

Page G-52

46) Where is this underground fuel area in relation to areas noted in Figures G-3 and G-4.



COMPLETENESS AND TECHNICAL REVIEW
CHAPTER H
WASTE ISOLATION PILOT PLANT
PART B PERMIT APPLICATION



SPECIFIC COMMENTS

H. PERSONNEL TRAINING

H-1a Job Title/Job Description: 264.16(d)(1) and (d)(2)

Page H-4, Lines 2 through 4

1) The application indicates that a file of all waste management job titles and job descriptions is maintained by the WIPP Human Resources Department. Revise the application to include this information. The descriptions should identify which job titles serve as emergency coordinators, office wardens, chief wardens, facility managers, etc., as identified in other chapters of the application.

H-1b Training Content, Frequency, and Techniques: 264.16(c) and (d)(3)

Page H-5

2) Revise the discussions on the Mixed Waste Worker course, Site-Generated Hazardous Waste Worker course, and Hazardous Waste Transportation course to identify the main topics presented, how the information is presented, and identify the job titles which must receive the training. Additionally, identify the topics covered in the annual refresher course.

Page H-5, Line 18

3) Indicate if the Hazardous Waste Transportation course addresses the transport of hazardous waste.

Page H-5, Lines 31 through 34

4) The application states that all training requirements may not have yet been established as additional test bin procedures may be established. Indicate that a permit modification addressing design changes and supporting information, such as training requirements, will be submitted if significant changes are required.



Page H-6, Lines 12 through 13

5) The application indicates that an individual may be re-examined if they fail an examination. Discuss whether or not the individual is ever retrained and/or recertified.

H-1c Training Director: 264.16(a)(2)

Page H-6, Lines 21 through 29

6) Provide the type of training in hazardous waste management procedures the Technical Training Manager must receive.

H-1e Training for Emergency Response: 264.16(a)(3)

Pages H-7 through H-8

7) The individuals with responsibilities and tasks identified in the contingency plan are not mentioned in Chapter H. Revise the description of emergency response training and contingency plan training to include the specific training requirements for all personnel, especially facility managers, emergency coordinators, and facility operator shift supervisors.

Page H-8, Lines 4 through 11

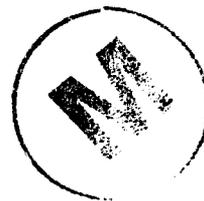
8) Identify the location and frequency of training for members of the emergency response team and the first line initial response team.

Page H-8, Lines 16 through 17

9) Clarify why only waste handling and emergency response personnel receives training on emergency procedures as a site emergency may impact all personnel.

10) Provide the training outlines for individual involved in specialized training, such as emergency and spill response, fire control, mine rescue, the FLIRT team, and other specialized groups mentioned in the Contingency Plan.

11) Provide a flow chart, indicating critical management and emergency response personnel. The flow chart provided in figure H-1 is not of sufficient detail. In addition, provide information on training or certification for critical positions.



COMPLETENESS AND TECHNICAL REVIEW
CHAPTER J
WASTE ISOLATION PILOT PLANT
PART B PERMIT APPLICATION

SPECIFIC COMMENTS

J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

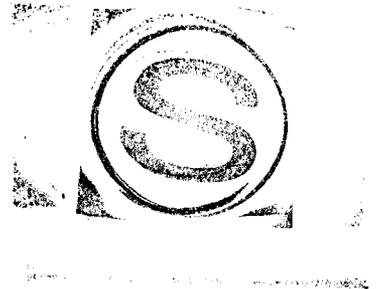
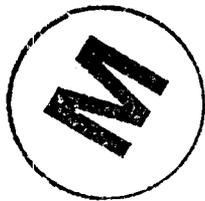
J-1 Solid Waste Management Units: 264.101

Page J-3, Lines 18 through 20

1) The application indicates that releases of hydrocarbons from underground storage tanks are not regulated under RCRA. HWMR-6, 261.4(b)(10) states that the petroleum contaminated media are covered under part 280 only if analysis of the media indicates that the material fails the test for the Toxicity Characteristic of 261.24, and only for waste codes D018 through D043. Revise the application to state that the operator will provide analytical data from soil testing to document that any future petroleum product release to soil is not regulated under RCRA.

J-1a Characteristics of Solid Waste Management Units:

- 2) Provide a list of all SWMUs.
- 3) Revise the information presented in Appendix J1 to indicate the length of time hazardous waste materials were formerly and are currently stored at the container storage areas.



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