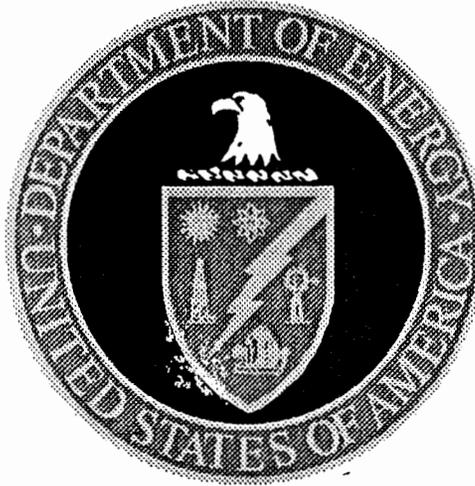


CARLSBAD AREA OFFICE
RCRA PART B APPLICATION



Craig A. Snider
Compliance Engineer

10/27/94



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10/27/94

SCHEDULE

Chap.	Description	Proposed Submit Date	Proposed Meeting Date
B	Facility Description	October 3, 1994	October 27, 1994 Stakeholder
E	Groundwater Monitoring		
G	RCRA Contingency Plan		
J	Corrective Actions for Solid Waste Mgt. Units		
K	Other Federal Laws		
F	Procedures to Prevent Hazards	October 12, 1994	October 27, 1994 Stakeholder
H	Personnel Training		
D	Facility and Process Description	January 6, 1995	January 31, 1995 Stakeholder
I	Closure/Postclosure Plans		
A	Part A Permit Application	March 2, 1995	March 23, 1995 Stakeholder
C	Waste Analysis Plan		
L	No-Migration Determination		
M	Certification		
All	Submit Revision 5 in Entirety	May 31, 1995	NMED Responsibility



GENERAL CHANGES

- **Waste Handling Building (WHB)**
- **Panel by panel closure**
- **Waste characterization**
- **Schedule**
- **Major chapter changes**



WASTE HANDLING BUILDING

- **Permit not being requested**
 - Does not meet the definition of miscellaneous unit
- **No waste storage is planned for the WHB**
- **No waste treatment is planned for the WHB**
- **Average time in residence for CH TRU waste in the WHB is less than eight hours**
- **Any long delays in moving waste underground will be avoided by not bringing in any more TRUPACTS**
- **Strictly a flow-through waste management operation**
- **Includes both CH-TRU and RH-TRU operations**



PANEL BY PANEL CLOSURE

- **All panels will be permitted as part of the miscellaneous unit**
 - **Subpart X**
- **A panel will be closed when it has been filled with waste**
- **Only three panels will be active at any time:**
 - **The panel being excavated (constructed)**
 - **The panel being filled**
 - **The panel being closed**



WASTE CHARACTERIZATION

- **Different from the Test Phase Permit Application**
 - **Statistically valid data will be accumulated on all waste streams**
- **Will make use of the continuing collection of data**
- **A statistical basis will be established**
- **Reference WCPD and QAPP** *SS 1-215 RWS*



CHAPTER B

FACILITY DESCRIPTION

- **Delete references to the "Test Phase" throughout**
- **Delete descriptions of the test equipment and procedures**
- **Delete container storage units in the WHB and Panel 1, Rooms 1 and 3 as HWMUs**
- **Added panels as HWMUs for disposal**
- **Added RH TRU to waste description**



CHAPTER E

GROUNDWATER MONITORING

- **As in Chapter B, deleted references to the "Test Phase" and test descriptions**
- **Updated some references**

APPENDIX E1

RCRA GROUNDWATER PROTECTION INFORMATION

- **Deleted descriptions of test equipment and procedures**
- **Minor informational updates**



CHAPTER G

CONTINGENCY PLAN

- **Same changes relative to test descriptions**
- **Updated descriptions of key personnel activities**
- **Updated list of emergency coordinators**



CHAPTER J CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

- **Minor wording revisions similar to other chapters**

APPENDIX J1 SOLID WASTE MANAGEMENT UNITS CHARACTERIZATION SHEETS

- **Updated Satellite Accumulation Areas tables to current configuration**



CHAPTER K OTHER FEDERAL LAWS

- Updated many of the environmental law descriptions to current status
- Includes minor revisions to Appendices K1 and K2



CHAPTER F

PROCEDURES TO PREVENT HAZARDS

- Updated similarly to Chapter E
- Revised to align with activities described in current WIPP procedures
- Updated Inspection Schedule Table and equipment list



CHAPTER H

PERSONNEL TRAINING

- **Described course changes instituted**
- **Deleted position codes from table of job position training requirements**
- **Updated appendices accordingly**



CHAPTER D

FACILITY AND PROCESS INFORMATION

- **Similar revisions as other chapters**
- **Delete storage provisions from the WHB descriptions**
- **Update time related references that have changed**
- **Describe the waste disposal processes in detail, including derived waste handling and disposal with the rest of the TRU mixed waste**
- **Add RH TRU mixed waste facilities and process descriptions**



CHAPTER I

CLOSURE PLANS, POSTCLOSURE PLANS, AND FINACIAL REQUIREMENTS

- **Similar revisions regarding test versus disposal**
- **Delete retrieval and container storage in the WHB discussions related to testing**
- **Add partial closure of panels as they are filled with waste**
- **Describe final closure after 6.2 million cubic feet of waste have been emplaced**
- **Describe the postclosure plan**



CHAPTER A

WIPP RCRA PART A PERMIT

- **Revise to delete reference to the "Test Phase" and include the "Disposal Phase"**
- **Revise the capacity to reflect waste to be disposed**
- **Replace "Rooms 1 and 3" with "Panels 1-8"**
- **Delete reference to alcoves**



CHAPTER C

WASTE ANALYSIS PLAN

- **Revise all "test" references to "disposal" as appropriate**
- **Revise the container descriptions**
- **Include description of RH TRU mixed waste**
- **Broaden the sources of the waste to all DOE generator sites**
- **Revise references from the NMD to the NMVP**
- **Include references to new DOE programs associated with waste characterization**



CHAPTER L NO-MIGRATION DETERMINATION

- **Treat the experimental NMD in an historical perspective**
- **Discuss the current activities aimed toward receiving a disposal NMD**

CHAPTER M CERTIFICATION

- **No change**



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