Mr. Steve Zappe  
New Mexico Environment Department  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo Road, Bldg A  
Santa Fe, NM 87502-6110

Subject: Notification of Asbestos Disposal Operations

Dear Mr. Zappe:

This letter is to confirm, pursuant to discussions with the Hazardous and Radioactive Materials Bureau and the Solid Waste Bureau on the November 10, 1999, that the WIPP is exempt from the solid waste regulations for the purpose of disposal of asbestos due to the presence of source, special nuclear or by-product material as defined by the Atomic Energy Act of 1954, as amended. It is our understanding that this exemption applies to the requirements for registration of operations, which are not defined as a solid waste facility pursuant to 20NMAC9.1.II.213.

This notice is hereby issued to provide the New Mexico Environment Department Solid Waste Bureau, Air Quality Bureau, and Hazardous and Radioactive Materials Bureau with information regarding WIPP’s intent to dispose of transuranic (TRU) and TRU-mixed waste co-mingled with asbestos.

As the asbestos waste is co-mingled with the TRU-mixed waste, it will be managed, stored, and disposed of consistent with the provisions of WIPP’s hazardous waste permit; number NM4890139088-TSDF. During handling and transportation, the isolation of the asbestos waste is accomplished using containers made of steel. Some also contain rigid, molded polyethylene liners. The containers meet the requirements of 20 NMAC 4.1.500 (incorporating 40 CFR §264.172).

Asbestos containing wastes to be disposed of at the WIPP come of the following DOE sites: Rocky Flats Environmental Technology Site; the Savannah River Site; the Idaho National Environmental Engineering Laboratory; the Hanford Site; and the Los Alamos National Laboratory. The asbestos containing wastes would be from various material production and/or laboratory facilities.

The asbestos containing waste will be composed primarily from floor tiles, transite panels, asbestos pipe insulation, asbestos pre-filter media, asbestos filter media, asbestos gloves, asbestos fire blankets, and construction debris. All of these materials will be co-mingled with TRU waste. The total volume of asbestos containing materials, co-mingled with TRU waste is projected to be approximately 12,000 m³.
Asbestos contaminated material will be managed at the generator/storage sites in accordance with their respective state regulations. WIPP will ship via the same dedicated commercial carrier used to transport other TRU waste to the site. First receipt of waste that is co-mingled with asbestos is anticipated February 1, 2000.

Please contact Ms. Cynthia Zvonar of my staff at (505) 234-7495 with any questions regarding this asbestos disposal notification.

Sincerely,

Dr. Inés R. Triay
Manager

cc:
C. Hules, NMED/SWB
C. Williams, NMED/AQB