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Pages (including cover sheet): *5*

Date: *7-26-00*

Re:

Comments:

*Page Revisions incorporated
into file & duplicate working
copies 7/26/00*

000745



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Enclosed please find page revisions for the Class 1 Permit Modification. The changes are as follows:

Table 1
Table of Contents
No. 5a
Change Mod II to read Mod III

Item 5
Revised Permit Text: 5.a
Change Module II.A.2 to Module III.A.2

Item 12
Revised Permit Text: 12.a
Module II.C.4
Add the sentence before the redline text which reads "Allowable TRU mixed wastes are specified in Table II.C.4.

Item 12
Revised Permit Text 12.c
Change Attachment B-1a to B-1b



Robert Kehrman
Westinghouse Waste Isolation Division

Item 12

Description:

Revise the hazardous waste codes currently allowable at WIPP to reflect State Hazardous Waste Codes from states outside of New Mexico.

Basis:

The State of New Mexico is unique in that it recognizes hazardous waste codes that are specific to other states. These codes address the same hazardous constituents as do the USEPA hazardous waste codes but allow the states more latitude in developing their waste code descriptions. States such as California, Washington, Texas and others have adopted their own specific coding system for hazardous waste which is generated, transported and disposed within their boundaries. In some cases, these states apply codes to waste constituents that are not considered hazardous under the New Mexico Regulations or the RCRA. In every case, except New Mexico, those state specific codes are not universal as are the Federal hazardous waste codes. In other words, the state specific codes are generally deleted from the Hazardous Waste Manifest once that waste crosses a state's borders. This becomes problematic at WIPP since those State Codes will now be maintained on the Hazardous Waste Manifest.

Discussion:

The addition of a state-specific code to a waste stream does not alter the characteristics of the waste stream. Likewise, it does not result in the need to identify more information about the waste stream to assure that the stream is adequately managed at the WIPP facility. Consequently, the addition of state-specific codes does not change the activities required by the permit except for several conditions related to reporting. Consequently, this modification is considered to be informational in nature and is a Class 1.

Revised Permit Text :

a. Module II.C.4

The Permittees shall accept containers which contain only those TRU mixed wastes listed in the Hazardous Waste Permit Application Part A, Permit Attachment O. Allowable TRU mixed wastes are specified in Table II.C.4 below Some of the waste may also be identified by unique state hazardous waste codes. These waste are acceptable at the WIPP as long as the TSDf-WAC are met.

b. Attachment B Introduction

The hazardous components of the TRU mixed waste to be managed at the WIPP facility are designated in the Permittees' RCRA Part A Permit Application (Permit Attachment O). Some of the waste may also be identified by unique state hazardous waste codes. These waste are acceptable at the WIPP as long as the Treatment, Storage, or Disposal Facility-Waste Acceptance Criteria (TSDf-WAC) in Module II.C.3 are met. This WAP describes the measures that will be taken to assure that the TRU mixed wastes received at the WIPP facility are within the scope of the RCRA Part A Permit Application (Permit Attachment O) as established by 20 NMAC 4.1.500 (incorporating 40 CFR §264), and that they comply with unit-specific requirements of 20 NMAC 4.1.500 (incorporating 40 CFR §264.600), Miscellaneous Units.

c. Attachment B-1b

Item 5

Description:

- a. Remove the words "the fence" to clarify the text.
- b. General Employee Training and its associated refresher course are designated with a number that reflects the century (e.g., GET 20X). Previously courses were designated with a "19". These have now been updated to "20".

Basis:

- a. A change to allow room for trucks to maneuver behind the Waste Handling Building resulted in text that was vague. This clarifies the text.
- b. The content of General Employee Training may change from year to year as facility conditions, regulatory conditions, or management policies change. In addition, employees are required to take a General Employee Training refresher course each year. Therefore, it is necessary to use a numbering system that allows the year to be identified. This system previously used "19" as the first two digits of the number. These have now been changed to "20". A permit change is necessary to update the course numbers. No change in the content or amount of training is included, therefore, this change is a Class 1 modification.

Discussion:

- a. This change is most appropriately classified as an administrative and informational change. The item neither substantially alters the permit conditions nor reduces the capacity of the facility to protect the human health and the environment.
- b. This modification updates numerous portions of Attachments H, H1, and H2 to reflect the new General Employee Training numbering system. There are numerous changes since General Employee Training is a prerequisite to many hazardous waste management worker courses. The revised text reflects both the "19" and "20" numbers since many workers satisfied the Initial General Employee Training requirement with a "19" series course. This change is administrative in nature.

Revised Permit Text:

- a. **Module III.A.2**

The Parking Area Container Storage Unit (**Parking Area Unit**) is an asphalt and concrete surface extending from ~~inside~~ north of the rail sidings to the WHB, within the Controlled Area. The Parking Area Unit shall be enclosed by chain link fence. The Parking Area Unit shall comprise a surface area of no more than 115,000 ft² (10,700 m²), as depicted in Permit Attachment M1, Figure M1-2.

- b. Attachment H1

RCRA Hazardous Waste Management Job Descriptions

Position Title: Sampling Team Assistant

Duties:

- Assists sampling team members in the collection of waste samples for characterization and environmental media for determination of possible releases. Sampling Team Assistant will not respond to hazardous material spills.

Table 1. Class 1 Hazardous Waste Facility Permit Modification

No.	Affected Permit Section	Item	Category	Attachment 1 Page #
1	a. B1 b. Table B3-9 c. B3-7 d. Table B6-4 e. D f. D1 g. H h. L	Changes to Class 1 Modifications submitted on November 10, 1999.	A.1 A.3	A-1
2	a. B1 b. B1 c. B1 d. Mod. III, D, E, F, G, M1, M2	Changes to Class 1 Modifications submitted November 15, 1999. Add 100-gallon drum as an approved waste management container	A.1 A.3	A-9
3	a. A, B3 b. H	Changes to Class 1 Modifications submitted November 30, 1999.	A.1	A-19
4	a. B3	Changes to Class 1 Modifications submitted January 7, 2000	A.1	A-22
5	a. Mod III b. H1	Changes to Class 1 Modifications submitted January 25, 2000	A.1	A-27
6	a. P b. P	Changes to procedures as the result of annual review. Change in procedure to make it specific to the groundwater monitoring program	A.1 A.4.a	A-29
7	a. F b. G c. M1 d. O	Update figures of the Waste Handling Building to reflect internal modifications	A.1	A-30
8	a. D1 MSHA Air Quality Monitoring D1 Facility Inspections	Revise the inspection forms to remove unnecessary information and to update reference to applicable procedure.	A.1	A-31
9	a. D1 Fork Lifts Used for Waste Handling	Revise the inspection form to reflect equipment upgrade.	A.1	A-32