

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221DATE: **JUL 20 2001**REPLY TO
ATTN OF: CBFO:ORC:HLP:VW:01-1316:UFC:5486SUBJECT: Implementation of the Class 2 Hazardous Waste Facility Permit Modification
Requiring Analysis of (trans)-1,2-Dichloroethylene and Formaldehyde**JUL 20 2001
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On July 6, 2001 the New Mexico Environment Department (NMED) approved a Class 2 Permit modification that incorporated the following changes which impact TRU waste generator site waste characterization activities:

NMED has added the Savannah River Site to the footnotes requiring formaldehyde analysis on Tables B-1 and B-3 in Permit Attachment B, and on Tables B3-2 and B3-4 in Permit Attachment B3. Analysis of formaldehyde previously applied only to the Los Alamos National Laboratory (LANL)

NMED has added (trans)-1,2-Dichloroethylene to the following tables:

Permit Attachment B

- Table B-1 (Summary of Waste Characterization Requirements: Headspace Gas, Total Volatile Organic Compounds)
- Table B-3 (Headspace Target Analyte List and Methods)
- Table B-4 (Required Organic Analyses and Test Methods: Halogenated VOCs)

Permit Attachment B3

- Table B3-2 (Gas VOC Target Analyte List and QAOs)
- Table B3-4 (VOC Target Analyte List and QAOs)

The TRU waste generator sites that are currently certified by the Carlsbad Field Office (CBFO) for the characterization of TRU waste to be sent to the WIPP have until **January 9, 2002** to incorporate these changes into their programs and begin implementation. This schedule is based on the NMED's July 13, 2001 issuance of the revised permit incorporating the changes.



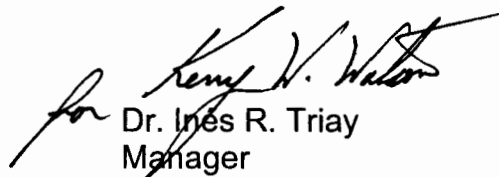
For waste sampled (headspace gas analysis and/or VOC analysis of S3000/4000 waste) prior to July 13, 2001, but not yet shipped, the TRU waste generator sites do not have to analyze for (trans)-1,2-Dichloroethylene or formaldehyde because this was not a permit requirement at the time the waste was characterized. The requirement LANL to perform formaldehyde analysis remains in effect during this period.

For waste sampled (headspace gas analysis and/or VOC analysis of S3000/4000 waste) between July 13, 2001 and January 9, 2002 the TRU waste generator sites do not have to analyze for (trans)-1,2-Dichloroethylene or formaldehyde as long as acceptable knowledge indicates that these compounds are **not** present in the waste streams being characterized. Note that the requirement for formaldehyde analysis only applies to the Savannah River Site and LANL. The requirement for LANL to perform formaldehyde analysis remains in effect during this period.

Any waste sampled (headspace gas analysis and/or VOC analysis of S3000/4000 waste) after January 9, 2002 will not be accepted at WIPP unless the required (trans)-1,2-Dichloroethylene or formaldehyde (if applicable) analyses have been performed.

Upon revision of the TRU waste generator site's programs to incorporate the requirements contained in the July 13, 2001 permit modification the sites are requested to submit the revised documents to CBFO for review. The revised documents will be reviewed by CBFO and any comments will be provided to the sites. Upon resolution of any comments the revised site program will be approved, in writing, by CBFO. Implementation of the revised program will be verified during the site's next recertification audit occurring after January 9, 2002.

If you have any questions concerning this subject, please contact me at (505) 234-7300 or Mr. Kerry Watson at (505) 234-7357.


for Dr. Inés R. Triay
Manager

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