

Subject: 3 class 2 mods

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Steve Zappe
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Dear Mr. Zappe:

This are my comments for the Sisters of Loretto regarding the three class 2 modification requests for WIPP.

1) Sampling through existing filter vent hole:

As I understand it, this request means sampling AFTER the headspace gas is filtered, instead of sampling unfiltered gas. This is not acceptable.

The description of this procedure in the request is vague and unclear, making the modification request incomplete. The problem seems to be with the POCs, yet the request is to apply to all containers. Also, there is some question regarding potential escape of residues and gases. Maybe DOE needs to design a container that is not so difficult to sample.

2) Visual Examination:

This request seems to take the randomness out of the selection process. If the radiography shows problems, the container needs to be carefully checked (and the current permit says to do it visually), not ignored by checking a substitute container.

If a waste container is randomly selected for visual examination and it does not meet the safety criteria, and the VE personnel cannot take sufficient precautions in opening the drum, then that container and others from the same waste stream should not be sent. No need to pick another container from the same group -- the group should not be sent. The worker is still protected, because if the container does not meet the safety criteria, then the container is not opened.

3) Headspace Gas Compositing:

This request does not make sense to me as a mathematician. In compositing, the total percentage could come out "safe" with one container still having a concentration too high to be really safe. For example, if the 250ml syringe is used for 20 drums, and one drum has a

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dangerously high concentration of forbidden content, and the other 19 drums have a low concentration, the one high drum will not be caught because it was diluted by the other 19. MICE agrees that "as volumes get smaller the associated error becomes larger."

In studies, even the 5:1 results were off for cyclohexane, so I wonder about the accuracy of any composite sampling. DOE claims that this particular test result is not significant because a single large value skewed the total, yet this is precisely the kind of thing (a single large value) that needs to be caught when looking for TICs.

If a study did not show a high enough concentration of a TIC, how do we know if it is because the compound was not there, or because the method could not detect it? The studies don't seem adequate enough to answer that. Seems to me that the studies need to be done on containers where it is already known exactly what is in the container, and needs to be done on containers that are known to have a high concentration, in order to test a new sampling method .

With this modification, DOE would have to be careful not to let any gas or residue escape, assure equal volumes of the composited samples, and keep more accurate documentation. Compositing samples is a method that is full of too many things that can go wrong and lead to error.

Therefore, I request that NMED deny all three of these requests. Each of these modifications would increase the possibility that some drums would arrive at WIPP with inadequate characterization, and could lead to larger amounts of VOCs than are allowed by the permit.

I also request that NMED not allow DOE to submit any more incomplete requests which waste the citizens' time and energy. Either NMED should deny them outright without making us go through this process, or if the incomplete request goes through the process, then DOE should not be allowed to submit the same basic request again. I do not like having taxpayer funds used for DOE to do the same sloppy work repeatedly.

Sincerely,
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