

Kliphuis, Trais, NMENV

From: Kliphuis, Trais, NMENV
Sent: Wednesday, December 28, 2011 1:35 PM
To: 'McCauslin, Susan - DOE'; 'Chavez, Rick - RES'
Subject: FW: FW: DRAFT Discussion and Proposal for Ventilation Language

Don Hancock's suggestion.

-----Original Message-----

From: Don Hancock [<mailto:sricdon@earthlink.net>]
Sent: Wednesday, December 28, 2011 10:50 AM
To: Kliphuis, Trais, NMENV
Subject: Re: FW: DRAFT Discussion and Proposal for Ventilation Language

Thanks for thinking about this matter.

Another portion of Permit Attachment A2-2a(3) that's not being proposed for modification states:

"The underground mine ventilation is designed to supply sufficient quantities of air to all areas of the repository. During normal operating mode (simultaneous mining and waste emplacement operations), approximately 140,000 actual ft³ (3,962 m³) per min can be supplied to the panel area. This quantity is necessary in order to support the level of activity and the pieces of diesel equipment that are expected to be in operation."

There are also various parts of the permit that discuss "emplacement operations." So another way to fix the problem might be to focus on "workers are present" language rather than the following language.

Thus: 4.5.3.2. Ventilation

The Permittees shall maintain a minimum running annual average mine ventilation exhaust rate of 260,000 standard ft³/min and a minimum active room ventilation rate of 35,000 standard ft³/min when workers are conducting emplacement operations in the room, as specified in Permit Attachment A2, Section A2-2a(3), "Subsurface Structures (Underground Ventilation System Description)" and as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.601(c)).

Similar language in Section A2-2a(3) could be put in.

I remain concerned about consequences of too much in the way of new definitions - CH active, RH active - etc.

Let me know if this is helpful.

On 12/28/2011 8:30 AM, Kliphuis, Trais, NMENV wrote:

>
> Hi Don,
>
> Thanks for talking with me. Here is a draft of the discussion. Please
> let me know what you think.
>
> The proposed language specifically excludes active RH waste rooms from
> the ventilation requirement.
>
> "The Permittees shall maintain a minimum running annual average mine
> ventilation exhaust rate of 260,000 scfm and a minimum room
> ventilation rate of 35,000 scfm when workers are present in the active



> room adjacent to the filled room or in Room 7 of any panel when CH TRU
> mixed waste is being disposed, as specified in Permit Attachment A2,
> Section A2-2a(3)..."

>

> To clarify, in the language proposed, the ventilation requirement only
> applies to active rooms if they are adjacent to a filled room (or Room
> 7). Therefore, RH active rooms would be exempt from the ventilation
> requirement and SRIC's concern is very valid. As written, RH waste
> handling and emplacement could occur without the RCRA ventilation.
> (As discussed previously, relying on another regulatory agency's lower
> minimum ventilation requirements in a RCRA Permit is not appropriate.)

>

> As I understand, the need for the modification is to allow workers to
> enter the RH room to adjust levers to set the ventilation rate. In the
> PRM the Permittee states:

>

> "Specifically, this modification makes it acceptable for a worker to
> enter a RH TRU mixed waste room with less than 35,000 scfm as long as
> that room is not adjacent to a filled CH TRU mixed waste room and RH
> waste handling is not under way in the room. Using the RH TRU mixed
> waste room to access the ventilation control louvers shortens the
> travel path for workers and minimizes the amount of time that must be
> spent in the exhaust drift."

>

> Therefore, I do not believe it was the intent of the applicant to
> broaden the ventilation exemption to the RH rooms for all times (when
> emplacement is occurring) and the language can be modified to address
> the citizen concern and allow the exemption that is truly needed.

>

> One possible solution would to modify the proposed definition of
> "Active Disposal Room" by distinguishing between the two types of
> active rooms. Specifically, have a definition for Active CH Room and
> "Active RH Room" where the RH active room was only active if RH waste
> is not fully emplaced and capped. Then, adjust the proposed language
> to specify the ventilation for both types of active rooms. E.g.

>

> "The Permittees shall maintain a minimum running annual average mine
> ventilation exhaust rate of 260,000 scfm and a minimum room
> ventilation rate of 35,000 scfm when workers are present in the CH
> active room, RH active room or in Room 7 of any panel when TRU mixed
> waste is being disposed, as specified in Permit Attachment A2, Section
> A2-2a(3)..."

>

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