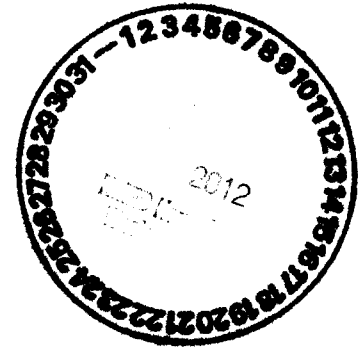


Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221

MAY - 3 2012



Mr. John Kieling, Acting Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505-6303

Subject: Notification of Class 1 Permit Modification to the Hazardous Waste Facility
 Permit, Number: NM4890139088-TSDF

Dear Mr. Kieling:

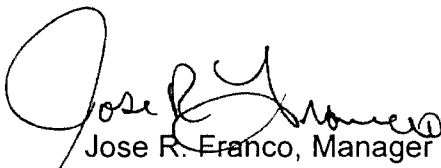
Enclosed is the following Class 1 Permit Modification Notification:

- Various Editorial Changes

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. George T. Basabilvazo at (575) 234-7488.

Sincerely,


 Jose R. Franco, Manager
 Carlsbad Field Office


 M. F. Sharif, General Manager
 Washington TRU Solutions LLC

Enclosure

cc: w/enclosure
 T. Kiphuis, NMED *ED
 J. Davis, NMED ED
 C. Walker, Trinity Engineering ED
 *ED denotes electronic distribution



Class 1 Permit Modification Notification

Various Editorial Changes

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP Permit Number - NM4890139088

April 2012

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Overview of the Permit Modification Notifications

This document contains Class 1 Permit Modification Notifications (**PMNs**) to modify the Hazardous Waste Facility Permit (**Permit**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088, hereinafter referred to as the Permit.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with Permit Part 1.3.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (40 **CFR**) 270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of changes which impact the WIPP facility. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in the PMNs. The proposed modifications to the text of the Permit have been identified using red text and double underline and a ~~strikeout~~ font for deleted information.

Attachment A
Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Affected Permit Section	Change Description	Category	Attachment A Page #
1. Permit Part 4, Section 4.5.3.2., Attachment A2, Section A2-2a(3) Attachment O, Section O-1, O-2, and O-3c(1)	This modification changes the reference from "where" to "when" in Permit Part 4.5.3.2., Attachment A2, Section A2-2a(3), and Attachment O, Section O-1, O-2 and O-3c(1).	A.1	A-5
2. Permit Part 5, Section 5.10.2.1. and Attachment L, Table L-3	This modification corrects in Permit Part 5, Section 5.10.2.1., related to submittal of analytical results of a sampling round by deleting a sentence; corrects a reference to the Annual Culebra Groundwater Report in Part 5.10.2.2.; and corrects the title of Part 5.10.2.3. Also, this modification changes the name, title and combines the description of two procedures in Permit Attachment L, Table L-3. The description was also updated to delete the term "serial sampling".	A.1	A-10
3. Permit Part 3, Section 3.8.	This modification changes the reference in Permit Section 3.8. from "Permit Section 2.11." to "Permit Section 2.14."	A.1	A-13
4. Permit Part 4, Tables 4.4.1, 4.6.2.3 and 4.6.3.2	This modification will change "1,1-Dichloroethene" to "1,1-Dichloroethylene" in Part 4 of the Permit, Tables 4.4.1, 4.6.2.3, and 4.6.3.2.	A.1	A-14
5. Attachment C, Section C-0	This modification changes the reference in Permit Attachment C, Section C-0 from "as defined in 20.4.1.800 NMAC (incorporating 40 CFR § 268.35(d)), and in the Federal Facility Compliance Act, Public Law 102-386, Title 1, §3021(d)" to "as defined in Permit Section 1.5.7."	A.1	A-16
6. Attachment C4, Section C4-3g	This modification is changing the reference in Attachment C, Section C-2; page C-12, line 21 from "Section C1-3" to "Section C1-4". Also, a space is being added between "Attachment" and "C1" on line 21. This modification also changes the	A.1	A-18

Affected Permit Section	Change Description	Category	Attachment A Page #
	reference in Attachment C4, Section C4-3g; page C4-14, line 11 from "Table B6-3 in Permit Attachment C6" to "Table C6-3 in Permit Attachment C6".		
7. Attachment C-6, Table C6-4, Item #219	This modification deletes item #219 from Attachment C6, Table C6-4.	A.1	A-19
8. Attachment N, Section N-5a(5)	This modification changes the completeness percent from 90 percent to 95 percent in Attachment N, Section N-5a(5).	A.1	A-20
9. Attachment N, Section N-3c, Table N-2	This modification revises Permit Attachment N, Section N-3c and Table N-2 to provide a separate method reporting limit (MRL) for disposal room volatile organic compound (VOC) monitoring.	B.2.a	A-22
10. Attachment D, Table D-2	Update the list of emergency coordinators in Permit Attachment D, Table D-2, Resource Conservation and Recovery Act Emergency Coordinators.	B.6.d	A-25

Item 1

Description

This modification changes the reference from “where” to “when” in Permit Part 4.5.3.2., Attachment A2, Section A2-2a(3), and Attachment O, Section O-1, O-2 and O-3c(1).

Basis

The change is classified as “Administrative and informational change” and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

The changes are in Permit Part 4.5.3.2., Attachment A2, Section A2-2a (3) and Attachment O, Sections O-1, O-2 and O-3c (2) of the Permit. The Permittees are changing the wording from “where” to “when” in the requirement to clarify that the time when the minimum ventilation rate (35,000 standard ft³/min) is required is when waste activities are occurring and when workers are present. This change is required to clarify the syntax relative to the “time” the Permit Condition applies, instead of what “location” the Permit Condition applies. The location (i.e., where) has already been identified as an active room.

Revised Permit Text

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 in each active room ~~where~~ when waste disposal is taking place and workers are present 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)).

A2-2a(3) Subsurface Structures

Underground Ventilation System Description

At any given time during waste emplacement activities, there may be significant activities in multiple rooms in a panel. For example, one room may be receiving CH TRU mixed waste containers, another room may be receiving RH TRU mixed waste canisters, and the drilling of RH TRU mixed waste emplacement boreholes may be occurring in another room. The remaining rooms in a panel will either be completely filled with waste; be idle, awaiting waste handling operations; or being prepared for waste receipt. A minimum ventilation rate of 35,000 ft³ (990 m³) per minute will be maintained in each active room ~~where~~ when waste disposal is taking place and workers are present in the room. This quantity of air is required to support the numbers and types of diesel equipment that are expected to be in operation in the area, to support the underground personnel working in that area, and to exceed a minimum air velocity of 60 ft (18 m) per minute. The remainder of the air is needed in order to account for air leakage through inactive rooms.

O-1 Definitions

A reasonably conservative conversion factor, therefore, is 1.2. Using this factor, 35,000 scfm is very nearly $35,000 \times 1.2$ or 42,000 acfm.

Restricted Access: If the required ventilation rate in an active room ~~where~~ when waste disposal is taking place cannot be achieved or cannot be supported due to operational needs, access is restricted by the use of barriers, signs and postings, or individuals stationed at the entrance to the active disposal room when ventilation rates are below 35,000 scfm. Note: As provided in O-3c(2) entry to restricted access active rooms for the purpose of establishing normal ventilation is allowed.

O-2 Objective

The objective of this plan is to describe how the ventilation requirements in the Permit will be met. This plan achieves this objective and documents the process by which the Permittees demonstrate compliance with the ventilation requirements by:

- Maintaining an annual running average of 260,000 scfm through the underground repository
- Maintaining a minimum of 35,000 scfm of air through the active rooms ~~where~~ when waste disposal is taking place and when workers are present in the rooms

O-3c(1) Verification of Active Room Minimum Airflow

Whenever workers are present, the Permittees shall verify the minimum airflow through active room(s) ~~where~~ when waste disposal is taking place of 35,000 scfm at the start of each shift, any time there is an operational mode change, or if there is a change in the ventilation system configuration.

Item 2

Description

This modification corrects in Permit Part 5, Section 5.10.2.1., related to submittal of analytical results of a sampling round by deleting a sentence; corrects a reference to the Annual Culebra Groundwater Report in Part 5.10.2.2.; and corrects the title of Part 5.10.2.3. Also, this modification changes the name, title and combines the description of two procedures in Permit Attachment L, Table L-3. The description was also updated to delete the term "serial sampling".

Basis

The change is classified as "Administrative and informational change" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

The Permittees are making several changes to Permit Part 5, Section 5.10.2.1., to correct errors; the following sentence is being deleted from Permit Part 5, Section 5.10.2.1.: "Analytical results of a sampling round may be included in the report specified in Permit Part 5, Section 5.10.2.3. if publication of the report coincides with the 120-calendar day report submittal schedule." This correction is required because Permit Part 5, Section 5.10.2.3., does not specify the contents of the annual report (Annual Culebra Groundwater Report). That specification is in the preceding paragraph of Part 5, Section 5.10.2.1. Furthermore, Part 5, Section 5.10.2.1., requires an annual report to be submitted by November 30 of each year. Reporting analytical data on a 120-day cycle is no longer required. The reference to Section 5.5.1. is being corrected to refer to all of Section 5.5. This change is required because Section 5.5.1. is related to sampling procedures and not analytical results.

Permit Part 5, Section 5.10.2.2. refers to the "Annual Culebra Groundwater Report" specified in Permit Part 5, Section 5.10.2.3. This report is specified in Permit Part 5, Section 5.10.2.1., so the reference is being corrected.

"Radionuclide Sampling Results" is being deleted from the title of Permit Part 5, Section 5.10.2.3. This correction is required because radionuclide sampling results are no longer required to be reported to the NMED by the Permit.

Attachment L, Table L-3, is being revised to combine the description for procedures 02-EM1005 and 02-EM1006 into one description and to change the number for these procedures to 02-EM1010. A new procedure 02-EM1010 has been developed that combines the sampling processes described in Table L-3 for 02-EM1005 and 02-EM1006 into one procedure. The description was also updated to delete the term "serial sampling" to be consistent with the current Permit recently updated due to the

Class 2 Permit Modification Request, "Revise the WIPP Groundwater Detection Monitoring Program Plan." These changes are required to update the Permit.

Revised Permit Text

5.10.2.1. Data Evaluation Results

The Permittees shall submit to the Secretary the analytical results required by Permit Sections 5.5.4 and 5.9.2, and the results of the statistical analyses required by Permit Section 5.9.3, in the Annual Culebra Groundwater Report by November 30 of each year as required by 20.4.1.500 NMAC (incorporating 40 CFR 264.97(j)).

~~Analytical results of a sampling round may be included in the report specified in Permit Section 5.10.2.3 if publication of the report coincides with the 120 calendar day report submittal schedule.~~

5.10.2.2. Groundwater Surface Elevation Results

The Permittees shall submit to the Secretary groundwater surface elevation data specified in Permit Section 5.7. This submittal shall include both groundwater surface elevations calculated from field measurements and fresh-water head elevations calculated as specified in Permit Attachment L, Section L-4c(1). Water level data shall be reported semiannually by May 31 and November 30. The November water level data report shall be combined with the Annual Culebra Groundwater Report specified in Permit Part 5.10.2.1 ~~3~~.

5.10.2.3. Groundwater Flow and Radionuclide Sampling Results

The Permittees shall submit to the Secretary an evaluation of the groundwater flow data (to include annotated hydrographs) specified in Permit Section 5.8 in the Annual Culebra Groundwater Report by November 30 of each calendar year.

**Table L-3
Standard Operating Procedures Applicable to the DMP**

Number	Title/Description
WP-02-EM1005	Groundwater Serial Sample Analysis: This procedure provides general instructions necessary to perform field analyses of serial samples in support of the DMP. Serial samples are collected and analyzed at the field laboratory for field indicators. Serial sample results help determine if pumped groundwater is representative of undisturbed groundwater within the formation.
WP-02-EM1006	Final and Serial Sample Collection: This procedure describes the steps for collecting groundwater samples from the DMWs near the WIPP facility. Serial samples are collected and analyzed at the Field Laboratory until stabilization of the field parameters occurs. Final samples for Resource Conservation and Recovery Act (RCRA) analyses are collected and analyzed by a contract laboratory.
<u>WP-02-EM1010</u>	<u>Field Parameter Measurements and Final Sample Collection: This procedure provides general instructions necessary to perform field analyses of serial samples in support of the DMP. Serial samples are collected and analyzed at the field laboratory for field indicators. Serial sample results help determine if pumped groundwater is representative of undisturbed groundwater within the formation. This procedure also describes the steps for collecting groundwater samples from the DMWs near the WIPP facility. Samples are collected and analyzed at the Field Laboratory until stabilization of the field parameters occurs. Final samples for Resource Conservation and Recovery Act (RCRA) analyses are collected and analyzed by a contract laboratory.</u>
WP-02-EM1014	Groundwater Level Measurement: This document describes the method used for groundwater level measurements in support of groundwater monitoring at the WIPP facility using a portable electronic water-level probe.
WP-02-EM1021	Pressure Density Survey: This procedure defines the field methodology used to determine the average density of fluid standing in the well bores of groundwater-level monitoring wells. The data derived from the survey are used to calculate equivalent freshwater heads at non-detection monitoring wells. Because most pressure densities are obtained by Sandia National Laboratories via pressure transducers installed in wells, this procedure is used to obtain pressure densities at wells not equipped with fixed transducers.
WP-02-EM1026	Water Level Data Handling and Reporting: This procedure provides instructions on handling water level data. Data are collected and recorded on field forms in accordance with WP-02-EM1014. This procedure is initiated when wells in the water surveillance program have been measured for a given month.
WP-02-EM3001	Administrative Processes for Environmental Monitoring and Hydrology Programs: This procedure provides the administrative guidance environmental monitoring personnel use to maintain quality control associated with environmental monitoring sampling and reporting activities. This administrative procedure does not pertain to volatile organic compound (VOC) monitoring, with the exception of Section 5.0 which pertains to the regulatory reporting review process.
WP-02-EM3003	Data Validation and Verification of RCRA Constituents: This procedure provides instructions on performing verification and validation of laboratory data containing the analytical results of groundwater monitoring samples. This procedure is applied only to the non-radiological analyses results for compliance data associated with the detection monitoring samples. The data reviewed for this procedure includes general chemistry parameters and RCRA constituents.
WP-02-RC.01	Hazardous and Universal Waste Management Plan: This plan describes the responsibilities and handling requirements for hazardous and universal wastes generated at the WIPP facility. It is meant to ensure that these wastes are properly handled, accumulated, and transported to an approved Treatment, Storage, Disposal Facility (TSDF) in accordance with applicable state and federal regulations, U.S. Department of Energy (DOE) Orders, and Washington TRU Solutions LLC (WTS) policies and procedures. This plan implements applicable sections of 20.4.1.100-1102 New Mexico Administrative Code (NMAC), <i>Hazardous Waste Management</i> (incorporating 40 Code of Federal Regulations [CFR] Parts 260-268 and 273).

Number	Title/Description
WP 10-AD3029	Calibration and Control of Monitoring and Data Collection Equipment: This procedure provides direction for the control and calibration of Monitoring and Data Collection (M&DC) equipment at the WIPP facility, and ensures traceability to NIST (National Institute of Standards and Technology) standards, international standards, or intrinsic standards. This procedure also establishes requirements and responsibilities for identifying recall equipment, and for obtaining calibration services for WIPP facility M&DC equipment.
WP 13-1	Washington TRU Solutions LLC Quality Assurance Program Description: This document establishes the minimum quality requirements for Management and Operating Contractor (MOC) personnel and guidance for the development and implementation of QA programs by MOC organizations.

Item 3

Description

This modification changes the reference in Permit Section 3.8. from "Permit Section 2.11." to "Permit Section 2.14."

Basis

The change is classified as an "administrative and informational change" and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

This change is required to correct the reference in Permit Section 3.8. from "Permit Section 2.11." to "Permit Section 2.14." The correct reference for recordkeeping requirements for results of waste analyses is Section 2.14., "Recordkeeping and Reporting," not Section 2.11., "Hazards Prevention."

Revised Permit Text

3.8. RECORDKEEPING

The Permittees shall place the results of waste analyses in the operating record as specified in Permit Section 2.144 and Permit Attachment C.

Item 4

Description

This modification will change "1,1-Dichloroethene" to "1,1-Dichloroethylene" in Part 4 of the Permit, Tables 4.4.1, 4.6.2.3, and 4.6.3.2.

Basis

The change is classified as an "administrative and informational change" and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

"1, 1-Dichloroethene" is being changed to "1, 1-Dichloroethylene" in Part 4 of the Permit, Tables 4.4.1, 4.6.2.3, and 4.6.3.2. 1, 1-Dichloroethene and 1,1-Dichloroethylene are names for the same chemical compound (CAS number 75-35-4). With the exception of Part 4 of the Permit, 1, 1-Dichloroethylene is used as the name for this compound consistently throughout the Permit. This change is required to make the name for this compound consistent throughout the Permit.

Revised Permit Text

Compound	VOC Room-Based Concentration Limit (PPMV)
Carbon Tetrachloride	9625
Chlorobenzene	13000
Chloroform	9930
1,1-Dichloroethene <u>ylene</u>	5490
1,2-Dichloroethane	2400
Methylene Chloride	100000
1,1,2,2-Tetrachloroethane	2960
Toluene	11000
1,1,1-Trichloroethane	33700

Table 4.6.2.3 - VOC Concentrations of Concern		
Compound	Drift E-300 Concentration	
	ug/m3	ppbv
Carbon Tetrachloride	6040	960
Chlorobenzene	1015	220
Chloroform	890	180
1,1-Dichloroethene	410	100
1,2-Dichloroethane	175	45
Methylene Chloride	6700	1930
1,1,2,2-Tetrachloroethane	350	50
Toluene	715	190
1,1,1-Trichloroethane	3200	590

Table 4.6.3.2 - Action Levels for Disposal Room Monitoring		
Compound	50% Action Level for VOC Constituents of Concern in Any Closed Room, ppmv	95% Action Level for VOC Constituents of Concern in Active Open or Immediately Adjacent Closed Room, ppmv
Carbon Tetrachloride	4,813	9,145
Chlorobenzene	6,500	12,350
Chloroform	4,965	9,433
1,1-Dichloroethene	2,745	5,215
1,2-Dichloroethane	1,200	2,280
Methylene Chloride	50,000	95,000
1,1,2,2-Tetrachloroethane	1,480	2,812
Toluene	5,500	10,450
1,1,1-Trichloroethane	16,850	32,015

Item 5

Description

This modification changes the reference in Permit Attachment C, Section C-0 from “as defined in 20.4.1.800 NMAC (incorporating 40 CFR 268.35(d)), and in the Federal Facility Compliance Act, Public Law 102- 386, Title 1, 3021(d)” to “as defined in Permit Section 1.5.7.”

Basis

The change is classified as an “administrative and informational change” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

The current reference in this section of the Permit for TRU mixed waste is incorrect; 40 CFR 268.35(d) is nonexistent, and the Federal Facility Compliance Act amended the Solid Waste Disposal Act by adding the definition of “mixed waste.” This definition is in Permit Section 1.5.7. This change is required to correct this reference.

Revised Permit Text

C-0 Introduction and Attachment Highlights

TRU mixed waste contains both TRU radioactive and hazardous components, as defined in ~~20.4.1.800 NMAC (incorporating 40 CFR, §268.35(d)), and in the Federal Facility Compliance Act, Public Law 102- 386, Title 1, §3021(d)~~ Permit Section 1.5.7. It is designated and separately packaged as either contact-handled (**CH**) or remote-handled (**RH**), based on the radiological dose rate at the surface of the waste container.

Item 6

Description

This modification is also changing the reference in Attachment C, Section C-2; page C-12, line 21 from "Section C1-3" to "Section C1-4". Also, a space is being added between "Attachment" and "C1" on line 21.

This modification changes the reference in Attachment C4, Section C4-3g; page C4-14, line 11 from "Table B6-3 in Permit Attachment C6" to "Table C6-3 in Permit Attachment C6".

Basis

The change is classified as an "administrative and informational change" and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

The correct reference for visual examination is Section C1-4, not Section C1-3; Section C1-3 has to do with Radiography. The requirements for visual examination are specified in Permit Attachment C1, Section C1-4. A space is being added between Attachment and C1 to read as "Attachment C1" rather than "AttachmentC1". The correct reference in Attachment C4, Section C4-3g for audit checklists is Table C6-3, not Table B6-3; Table B6-3 is nonexistent. This change is required to correct this reference.

Revised Permit Text

C-2 Waste Characterization Program Requirements and Waste Characterization Parameters

For those waste streams or containers that are not amenable to radiography (e.g., RH TRU mixed waste, direct loaded ten-drum overpacks (TDOPs)) for waste confirmation by the Permittees pursuant to Permit Attachment C7, generator/storage site VE data may be used for waste acceptance. In those cases, the Permittees will review the generator/storage site VE procedures to ensure that data sufficient for the Permittees' waste acceptance activities pursuant to Permit Attachment C7 will be obtained and the procedures meet the minimum requirements for visual examination specified in Permit Attachment C1 Attachment C1, Section C1-43.

C4-3g Audits of Acceptable Knowledge

Audit checklists shall include Table BC6-3 in Permit Attachment C6, and will include but not be limited to the following elements for review during the audit:

Item 7

Description

This modification deletes item #219 from Attachment C6, Table C6-4.

Basis

The change is classified as an "administrative and informational change" and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

Section C1-6 of the Permit discusses the use of blank samples within shipping containers to detect VOC cross-contamination. This portion of the Permit applies to travel blanks which are used only with solidified-waste samples and not headspace-gas samples. Therefore, it is appropriate to delete item #219 from Table C6-4 (Headspace Gas Checklist); item #121 from Table C6-2 (Solids and Soils/Gravel Sampling Checklist) will remain in place. This change is required to correct Table C6-4.

Revised Permit Text

Table C6-4 Headspace Gas Checklist

219	Are procedures in place to ensure that an appropriate blank sample is included with each shipment container to detect any VOC cross-contamination? (Section C1-6)
-----	--

Item 8

Description

This modification changes the completeness percent from 90 percent to 95 percent in Attachment N, Section N-5a(5).

Basis

The change is classified as an "administrative and informational change" and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion

This change is required to change the completeness percent from 90 to 95 percent in Attachment N, Section N-5a(5) to be consistent with Table N-2.

Revised Permit Text

N-5a(5) Completeness

The expected completeness for this program is greater than or equal to ~~90~~ 95 percent. Data completeness will be tracked monthly.

Item 9

Description

This modification revises Permit Attachment N, Section N-3c and Table N-2 to provide a separate method reporting limit (MRL) for disposal room volatile organic compound (VOC) monitoring.

Basis

The change is classified as “changes to an analytical quality assurance/control plan: to conform with agency guidance or regulations” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, B.2.a).

Discussion

The Permittees are revising Permit Attachment N, Section N-3c and Table N-2 by adding a new column entitled “Required Disposal Room MRL (ppbv).” This change is required to align the MRL for disposal room monitoring with Permit Attachment N, Sections N-4 and N-5, thereby facilitating the room-based analysis. These revised MRLs were overlooked when room-based monitoring was added to the Permit in 2006. These revised MRLs are consistent with the EPA methods guidance in that they accommodate the much higher concentrations in room-based samples. Permit Attachment N, Section N-3c is being modified to delineate the MRLs required by Repository Monitoring and Disposal Room Monitoring to be consistent with the EPA methods.

In order to efficiently implement the specified analytical method, MRLs have been added for room-based analysis as required by Permit Attachment N, Section N-3c. This is needed because the room-based concentrations are typically several orders of magnitude higher than the repository-based concentrations. Clarification was also added to indicate that the MRLs are maximum values for undiluted samples. The methods allow for adjusting the MRLs to compensate for dilution; therefore, laboratories would be allowed to have different MRLs. As a result, “maximum” is being specified for clarification to assure data usability.

Additionally, a column heading has been revised by adding “Repository Monitoring”. This change is required to clearly delineate the MRLs for Repository Monitoring versus disposal room monitoring.

Revised Permit Text

N-3c Sampling and Analysis Methods

The canister sampling system and GC/MS analytical method are particularly appropriate for the VOC Monitoring Programs because a relatively large sample volume is collected, and multiple dilutions and reanalyses can occur to ensure identification and quantification of target VOCs within the working range of the method. The contract-required quantitation limits (**CRQL**) for Repository Monitoring are 5 parts per billion by volume (**ppbv**) or less for the nine target compounds. Consequently, low concentrations can be measured. CRQLs are the EPA-specified levels of quantitation proposed for EPA contract laboratories that analyze canister samples by GC/MS. For the purpose of this plan, the CRQLs will be defined as the method reporting limits (**MRL**). The MRL is a function of instrument performance, sample preparation, sample dilution, and all steps involved in the sample analysis process. The MRL for Disposal Room Monitoring is 500 ppbv or less for the nine target compounds.

Table N-2
Quality Assurance Objectives for Accuracy, Precision, Sensitivity, and Completeness

Compound	Accuracy (Percent Recovery)	Precision (RPD) Laboratory Field		Required Repository Monitoring MRL (ppbv)	Required Disposal Room MRL (ppbv)	Completeness (Percent)
Carbon tetrachloride	60 to 140	25	35	2	<u>500</u>	95
Chlorobenzene	60 to 140	25	35	2	<u>500</u>	95
Chloroform	60 to 140	25	35	2	<u>500</u>	95
1,1-Dichloroethylene	60 to 140	25	35	5	<u>500</u>	95
1,2-Dichloroethane	60 to 140	25	35	2	<u>500</u>	95
Methylene chloride	60 to 140	25	35	5	<u>500</u>	95
1,1,1,2-Tetrachloroethane	60 to 140	25	35	2	<u>500</u>	95
Toluene	60 to 140	25	35	5	<u>500</u>	95
1,1,1-Trichloroethane	60 to 140	25	35	5	<u>500</u>	95

MRL maximum method reporting limit for undiluted samples

RPD relative percent difference

Item 10

Description

Update the list of emergency coordinators in Permit Attachment D, Table D-2, Resource Conservation and Recovery Act Emergency Coordinators.

Basis

The change is classified as a “change in the name, address or phone number of coordinators” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, B.6.d).

Discussion

One individual is being added as an alternate emergency coordinator, and Table D-2 is being updated to indicate that change. No other changes to this table, including personal information, are being made. This change is required to update Permit Attachment D, Table D-2.

Revised Permit Text

**Table D-2
Resource Conservation and Recovery Act Emergency Coordinators**

Name	Address*	Office Phone	Personal Phone*
R. C. (Russ) Stroble (primary) ¹		234-8276 or 234-8554	
J. E. (Joseph) Bealler ²		234-8276 or 234-8916	
M. G. (Mike) Proctor ²		234-8143	
G. L. (Gary) Kessler ²		234-8326	
A. E. (Alvy) Williams ¹ (primary)		234-8276 or 234-8216	
P. J. (Paul) Paneral ¹ (primary)		234-8498	
J. R. (Joel) Howard ²		234-8325	
M. L. (Mark) Long ¹ (primary)		234-8170	
<u>A.C. (Andy) Cooper²</u>		<u>234-8197</u>	

* NOTE: Personal information (home addresses and personal phone numbers) has been removed from informational copies of this Permit.

¹ The on-duty Facility Shift Manager is the primary RCRA Emergency Coordinator pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.52), and is designated to serve as the RCRA Emergency Coordinator.

² The on-duty Facility Operations Engineer is the alternate RCRA Emergency Coordinator and is available as needed.