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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 4, 2009

David Moody, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Farok Sharif, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: SUBMITTAL OF CORRECTED VOLATILE ORGANIC COMPOUND INFORMATION
WIPP HAZARDOUS WASTE FACILITY PERMIT
EPA I.D. NUMBER NM4890139088**

Dear Dr. Moody and Mr. Sharif:

The New Mexico Environment Department (NMED) is in receipt of the Department of Energy's Carlsbad Field Office and Washington TRU Solutions LLC (collectively, the **Permittees**) November 17, 2009 submission of corrected volatile organic compound (VOC) information as required by Permit Condition I.E.15 of the Waste Isolation Pilot Plant (WIPP) hazardous waste facility permit. This submission identified a discrepancy between a Flo Sonic airflow meter reading and the associated data logger reading between November 2007 and October 28, 2009. This discrepancy resulted in miscalculating the actual airflow in the E-300 drift at Station VOC-A, which in turn resulted in reporting normalized VOC concentrations that were approximately 40% lower than would have been calculated with the correct airflow. The Permittees submitted corrected information associated with five prior Notifications of Exceedance of Repository VOC Concentrations of Concern for carbon tetrachloride, and identified 21 additional exceedances for carbon tetrachloride between December 22, 2008 and September 30, 2009.

Although individual exceedances of concentrations of concern (COCs) require only notification under Permit Condition IV.F.2.c, NMED is aware that the running annual average for carbon tetrachloride is continuing to increase, and that Permit Condition IV.F.2.d will require remedial action if this running annual average exceeds the COC. NMED generally concurs with the Permittees' premise that "the main contribution of carbon tetrachloride appears to be from wastes in filled panels (Panels 3 and 4)." NMED therefore recognizes that the contemplated remedial

action – to cease disposal in the active disposal room and install ventilation barriers – will likely not mitigate the continued releases of carbon tetrachloride,

In the interest of obtaining information that is more relevant to monitoring the Permittees' progress in mitigating repository VOC emissions, and in addition to the reporting requirements in Permit Condition IV.F.2.c, NMED requests the following information:

1. Normalized concentration differences between Stations VOC-A and VOC-B and the running annual average for carbon tetrachloride calculated for each sampling event since January 1, 2005, both as an electronic spreadsheet and as one or more plots of concentration versus date.
2. For each exceedance reported under Permit Condition IV.F.2.c, a copy of the sample data sheets for the sample collection event at Station VOC-A, and the meteorological data summary sheets and air conversion log sheets that are used for normalizing the laboratory result.
3. On a monthly basis until further notice, the information specified in #1 above as a monthly addendum to the previously provided electronic spreadsheet. E-mail transmittal of this information is acceptable to NMED.
4. On a monthly basis and as long as the running annual average for carbon tetrachloride exceeds 60 ppbv any time during that month, a plot of the running annual average concentration versus date for the preceding 24 months.

If you have any questions regarding this matter, please contact Steve Zappe at 476-6051.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

cc: Steve Zappe, NMED HWB
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
Connie Walker, Trinity Engineering
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