



SOUTHWEST RESEARCH AND INFORMATION CENTER

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December 23, 2009

David C. Moody
DOE Carlsbad Field Office
Carlsbad, NM

VIA E-MAIL AND FAX

Dear Dave,

Southwest Research and Information Center (SRIC) has been reviewing for several months the notices that you have provided to the New Mexico Environment Department (NMED), pursuant to Module IV.F.2.c of the WIPP Hazardous Waste Permit. SRIC has been concerned about the continuing and increasing levels of carbon tetrachloride in the Running Annual Average, and the apparent inability of CBFO to mitigate the unexpected problem. At the pre-submittal meeting on December 16, we were assured that CBFO is taking the situation very seriously and you are considering a wide range of options. We were also told that the matter would be further discussed at the WIPP Quarterly Meeting on January 21.

However, the current maintenance outage provides a good opportunity to take precautionary actions before shipments are resumed. SRIC believes that the following actions are appropriate.

1. Suspend shipments of waste streams with significant levels of carbon tetrachloride.

SRIC has seen no listing of the waste stream(s) that are likely the cause of the carbon tetrachloride exceedances in the notifications to NMED or in the presentation at the October 22, 2009, Quarterly Meeting. SRIC presumes that CBFO has compiled such a list and requests that it be made public. Waste streams on such a list should not be shipped to WIPP until the VOC exceedance problem is resolved and measures are in place to prevent its recurrence. SRIC is concerned that such a suspension may not be in place, since, according to the public WWIS, shipments from waste stream ID-RF-S3114 were arriving at WIPP at least as recently as September 23, 2009, two months after you first reported the exceedances to NMED. If you have already stopped shipments of some waste stream(s), thank you for doing so and please advise us of the specifics of the suspension. If not, please take such action or provide an explanation of why it has not been done.

2. WIPP underground workers should be fully informed about the continuing levels of carbon tetrachloride and should be encouraged to report any potential symptoms.

SRIC is aware that the Concentrations of Concern in Table IV.F.2.c of the WIPP Permit are below levels that are expected to cause significant health effects and that the levels being reported are not necessarily those to which underground workers are directly exposed. Nevertheless, people have different levels of susceptibility to chemical exposures, and

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underground workers may now be exposed to higher levels of carbon tetrachloride than was the case in the early years of WIPP's operations. According to Attachment 2 of your November 17, 2009 letter to NMED correcting previous VOC information, higher levels have been measured for at least a year. SRIC believes that all underground WIPP workers should be fully informed about the carbon tetrachloride exceedances and potential health effects and symptoms. Any worker with possible symptoms of carbon tetrachloride exposure should be encouraged to report their condition and to consult with medical professionals. Underground workers that are sick or absent should also be examined to see if their symptoms might reflect carbon tetrachloride exposure. If you have already taken such actions, thank you and please advise of the specific measures taken. If not, please initiate such practices or provide an explanation for why they are not being done.

3. Strong consideration should be given to emplacing the explosion/isolation wall in panels 3 and 4.

Your November 17, 2009 letter to NMED submitting corrected VOC information stated that the "main contribution of carbon tetrachloride appears to be from wastes in filled panels (Panels 3 and 4). Therefore, the Permittees have taken actions to reduce VOC emissions from those panels." At the October 22 Quarterly Meeting, it was reported that an additional bulkhead was installed at Panel 3 (Exhaust) and that a foam sealant was placed around the flashing of the inlet Panel 3 bulkhead and two bulkheads of Panel 4, as of September 24, 2009. Nonetheless, the exceedances notice of December 21, 2009 shows both that exceedances continue and that the Running Annual Average is increasing as of November 11, more than six weeks after those actions were taken. Thus, those measures must be judged to be insufficient. Panels 1 and 2 have been partially closed with an explosion isolation wall, which appears to mitigate releases of carbon tetrachloride. Panels 3 and 4 have not been partially closed with the explosion isolation wall because of permit modifications approved by NMED in 2007 and 2008, to which SRIC did not object. However, based on the carbon tetrachloride exceedances, SRIC is re-evaluating its position to allow the bulkheads for hydrogen and methane monitoring. SRIC believes that CBFO should also seriously consider supporting a change in the permit to again require the explosion isolation wall. Further, SRIC suggests that CBFO should begin discussions with stakeholders about the panel closure system in the near future.

As always, we are available to discuss these matters with you or your staff.

Sincerely,



Don Hancock