



SOUTHWEST RESEARCH AND INFORMATION CENTER

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January 15, 2010

David C. Moody
DOE Carlsbad Field Office
Carlsbad, NM

VIA E-MAIL AND FAX

Dear Dave,

Thank you for your response yesterday to the Southwest Research and Information Center (SRIC) letter to you on December 23, 2009. I plan to be at the Quarterly Meeting on January 21, when the carbon tetrachloride issue is one of 12 suggested topics for CBFO to discuss. Given those numerous items, there will likely not be sufficient time to fully discuss the carbon tetrachloride problem during the Quarterly Meeting. Therefore, SRIC requests that either knowledgeable CBFO and contractor people remain after the Quarterly Meeting to further discuss the matter or that another meeting be scheduled in the near future to more fully discuss the situation.

To assist you to more fully respond to our concerns, we have the following four points.

First, SRIC considers your response inadequate to our first request – suspend shipments of waste streams with significant levels of carbon tetrachloride. You state that you “are considering reducing the frequency and quantity of carbon tetrachloride bearing waste being shipped and disposed of at WIPP until the associated RAA has been reduce and/or stabilized. Currently configured shipments with carbon tetrachloride bearing waste will be shipped to WIPP for disposal.” Thus, you are intentionally allowing additional amounts of carbon tetrachloride to be brought to WIPP even though the rising Running Annual Average (RAA) could require stopping disposal in an active disposal room and closure of Panel 5 before its maximum capacity is reached, in order to comply with Module IV.F.2.d of the WIPP Hazardous Waste Permit. SRIC believes that it is inappropriate to receive waste with any significant amounts of carbon tetrachloride while you are reporting exceedances of that solvent. Therefore, we reiterate our request to suspend such shipments.

Second, your letter identifies two waste streams. According to its Waste Stream Profile Form (WSPF), ID-RF-S3114 includes 8,169 55-gallon drums. The WSPF Totals Analysis shows carbon tetrachloride maximum of 71,000 mg/kg and a mean of 50,400 mg/kg per container. According to the public WWIS, 248 drums from that waste stream have been disposed at WIPP. According to its WSPF, ID-SDA-SLUDGE including 25,013 55-gallon drums and 506 SWBs. The WSPF Totals Analysis shows carbon tetrachloride maximum of 10.6919 mg/kg and a mean of 1.5609 mg/kg per container. According to the public WWIS, 8,889 drums from that waste

stream have been disposed at WIPP. Obviously, both waste streams have many more containers still to be shipped to WIPP than those that have been disposed. Thus, if those two waste streams are the source of the carbon tetrachloride, the amounts in the future could be much larger than that already disposed at WIPP. Thus, SRIC questions whether remedial action at WIPP can adequately address the problem of future shipments. CBFO should be developing ways to reduce the amounts of carbon tetrachloride at the generator/storage site before those wastes are shipped to WIPP.

Third, your letter states that “greater than 80 percent of the solidified organics waste containers containing carbon tetrachloride are emplaced in Panels 4 (filled) and 5 (active).” That statement is not totally consistent with your November 17, 2009 letter to NMED that stated that the “main contribution of carbon tetrachloride appears to be from wastes in filled panels (Panels 3 and 4).” While you may have more reliable information now than when your November letter was submitted, SRIC remains concerned as to how well CBFO understands the problem and how effective the responses are. SRIC would like to better understand and review the investigations and analysis that have been done over the past several months regarding the problem, its source, and possible means of remediation that have been considered and implemented.

Fourth, your letter briefly describes the “proactive measures” that are being taken at Panel 4 and Panel 5. But you do not address SRIC’s request that you give strong consideration to emplacing the explosion/isolation wall in Panels 3 and 4 and that you begin discussions with stakeholders about the panel closure system in the near future. We renew that request.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hancock", written in a cursive style.

Don Hancock