



Department of Energy

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

NOV 14 2019

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

Subject: Report of Implementation of the *Resource Conservation and Recovery Act Contingency Plan* at the Waste Isolation Pilot Plant Facility on November 2, 2019, Hazardous Waste Facility Permit, Number NM 4890139088-TSDF

Dear Mr. Kieling:

The purpose of this letter is to provide you with the enclosed subject report pursuant to Permit Attachment D, Section D-5, *Required Reporting*.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to 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 regarding this notification, please call Mr. Michael R. Brown at (575) 234-7476.

Sincerely,

Signatures on File

Kirk D. Lachman
Acting Manager
Carlsbad Field Office

Sean Dunagan
President and Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

R. Maestas, NMED *ED

D. Biswell, NMED ED

M. McLean, NMED ED

CBFO M&RC

*ED denotes electronic distribution

**Report of Implementation of the
Resource Conservation and Recovery
Act**

**Contingency Plan
at the Waste Isolation Pilot Plant**

November 2, 2019

Report of Implementation of the RCRA Contingency Plan at the Waste Isolation Pilot Plant Facility (EPA I.D. Number NM4890139088) on November 2, 2019

The purpose of this report is to satisfy the requirement in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (Permit) Attachment D, *RCRA Contingency Plan*, Section D-5, *Required Reporting*, to submit a written report of the incident to the Secretary of the New Mexico Environment Department and to the U.S. Environmental Protection Agency Region VI Administrator within 15 days of implementing the *RCRA Contingency Plan*. The information required to be included in the report is provided below.

- The name, address, and telephone number of the Owner/Operator

United States Department of Energy, the owner and operator of the WIPP facility,
and Nuclear Waste Partnership LLC (NWP), co-operator of the WIPP facility
P.O. Box 3090
34 Louis Whitlock Road
Carlsbad, NM 88221
(575) 234-7300

- The name, address, and telephone number of the facility

Waste Isolation Pilot Plant
P.O. Box 3090
34 Louis Whitlock Road
Carlsbad, NM 88221
(800) 336-9477

- The date, time, and type of incident (e.g., fire, explosion or release)
 - On November 2, 2019 (Saturday), at approximately 1344 MDT, the WIPP *RCRA Contingency Plan* was implemented as a precautionary measure while the operating staff investigated the condition of a 55-gallon drum in the Contact-Handled (CH) Bay of the Waste Handling Building Container Storage Unit. Verbal notification of implementation of the *RCRA Contingency Plan* was provided to the NMED on November 2, 2019 at approximately 1425 MDT.
 - The 55-gallon drum (Container Identification Number SRP23610) was from the Idaho National Laboratory (INL) Site. It was received at the WIPP facility in shipment number IN190214. The TRUPACT-II (No. 149) was shipped with two, 55-gallon drum assemblies (7 drums per assembly). Upon removing the top drum assembly from the shipping package on November 2, 2019, a corroded area was observed with a small hole (approximately 3 mm in diameter) in the side of the drum. The drum was not removed from the drum assembly. The waste inside the drum was contained within a rigid drum liner. Radiological surveys were performed and results identified there was no release from the drum.
 - Because the small hole in the exterior of the drum could be an indication of a waste release or potential release from the drum, the following precautionary measures were taken:
 - A safe configuration for the waste drum was achieved by placing the 7-drum assembly back into the TRUPACT-II container and procedurally re-installing the inner and outer lids to close the TRUPACT-II.

- Waste handling activities in the affected area were suspended on November 2, 2019.
- The 55-gallon drum (SRP23610) was packaged at the INL Site in 2014 and contains debris waste which also contains PCB remediation waste. The drum was in the top drum assembly in the TRUPACT-II. The drum was not removed from the drum assembly. Radioactive contamination was not detected on either the drum or inside the TRUPACT-II.
- Because the condition represented a potential for a fire, explosion, or release of hazardous waste or hazardous waste constituents, the *RCRA Contingency Plan* was implemented on November 2, 2019 at approximately 1344 MDT pursuant to the first paragraph in Permit Attachment D, Section D-3 *Criteria for Implementation of the RCRA Contingency Plan*.

The provisions of the RCRA Contingency Plan shall be implemented immediately whenever there is a fire, an explosion, or a release of hazardous wastes or hazardous waste constituents that could threaten human health or the environment, or whenever the potential for such an event exists as determined by the RCRA Emergency Coordinator, as required under 20.4.1.500 NMAC (incorporating 40 CFR §264.51(b)).

- The name and quantity of material(s) involved
 - One 55-gallon drum (SRP23610) with a total weight of the loaded drum of 165.60 kgs (waste and packaging). The waste inside is S3000-debris waste from the INL Site which also contains PCB remediation waste.
- The extent of injuries, if any
 - No injuries resulted from the drum waste handling activities.
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
 - There were no actual or potential hazards to human health or the environment. Waste handling activities in the affected area were suspended on November 2, 2019.
- The estimated quantity and disposition of recovered material that resulted from the incident
 - No materials required recovery or disposition.
- Any additional information/comments
 - A Response Plan is being developed regarding the 55-gallon drum to determine the appropriate actions for disposition of the drum and to restore the process areas to normal functions.