Class 1 Permit Modification Notification Revise Fire Water Distribution System Figures

Waste Isolation Pilot Plant Carlsbad, New Mexico

WIPP HWFP #NM4890139088-TSDF

September 2008

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Acronyms and Abbreviations

CBFO Carlsbad Field Office

CFR Code of Federal Regulations

DOE Department of Energy

HWFP Hazardous Waste Facility Permit
NMAC New Mexico Administrative Code
NMED New Mexico Environment Department

PMN Permit Modification Notification

RCRA Resource Conservation and Recovery Act
TSDF Treatment, Storage and Disposal Facility

WIPP Waste Isolation Pilot Plant

WTS Washington TRU Solutions LLC

Overview of the Permit Modification Notification

This document contains one Class 1 Permit Modification Notification (**PMN**) to the Hazardous Waste Facility Permit (**HWFP**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the WIPP HWFP.

This PMN is 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 the WIPP HWFP, Condition I.B.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 PMN in this document is necessary to notify the New Mexico Environment Department (**NMED**) of some revised fire water distribution line figures. This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modification to the WIPP HWFP and any related supporting documents are provided in this PMN. The proposed modification to the text of the WIPP HWFP has been identified using red text and <u>double underline</u>, and a <u>strikeout</u> font for deleted information. All direct quotations are indicated by italicized text.

Attachment A

Description of the Class 1 Permit Modification Notification

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notification

Affected Permit Section	Change Description	Category	Attachment A Page #
a. Attachment F, Figures F-6, F-10, F-10a, F-11 and F-11a	Add new valve to the fire water distribution system	A.1	A-3

Description:

Revise five figures in the HWFP to include a new post indicator valve (PIV) that has been added to the fire water distribution system.

Basis:

The change is classified as "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:

On June 30, 2008 the Permittees submitted a Notification of Planned Change to the Permitted Facility. In this Notification it was determined that a Class 1 Permit Notification would be required to revise Figure F-6 when the construction activities and certification were completed. Construction of the new fire water distribution system and the certification by a registered Professional Engineer is now complete. After installation of the PIV, the Permittees determined that the pre-fire survey figures in the HWFP would also need updating since the new PIV is now part of the pre-fire survey. These figures are Figures 10, 10a, 11 and 11a. This modification updates all five figures to reflect the addition of the new PIV per the Notification of Planned Change.

Included with Figure F-6 are two figures. One is an expanded view of the affected area of the figure with a "cloud" around the new PIV for ease in determining where the change has been made. The other is a "clean" figure for insertion in the revised Permit. A "clouded" figure is not necessary for the remainder of the figures.

Revised Permit Text:

a.1. Attachment F, Figure F-6, F-10, F-10a, F-11 and F-11a

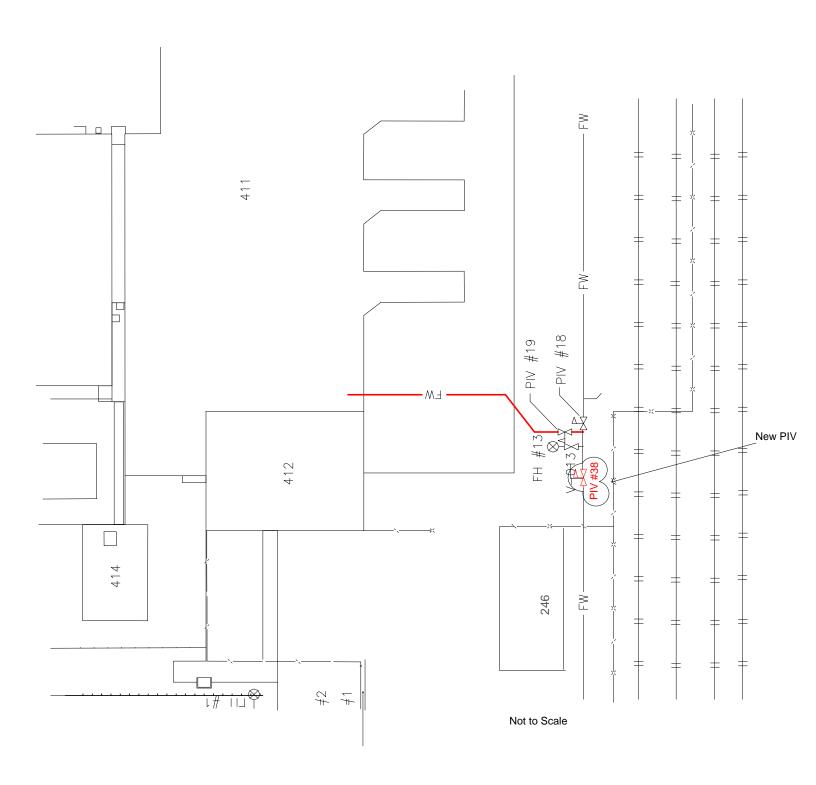


Figure F-6 Clouded and Expanded Fire-Water Distribution System

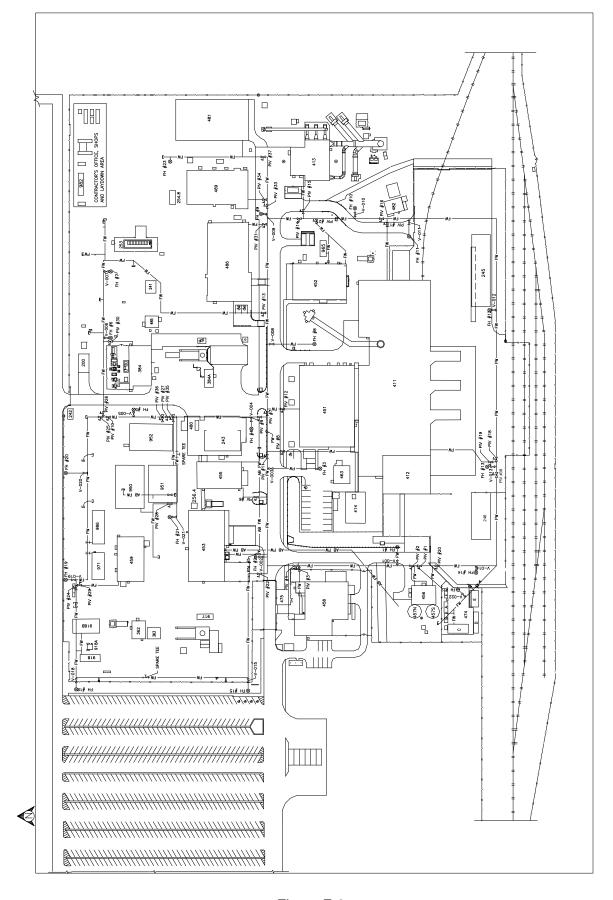


Figure F-6
Fire-Water Distribution System

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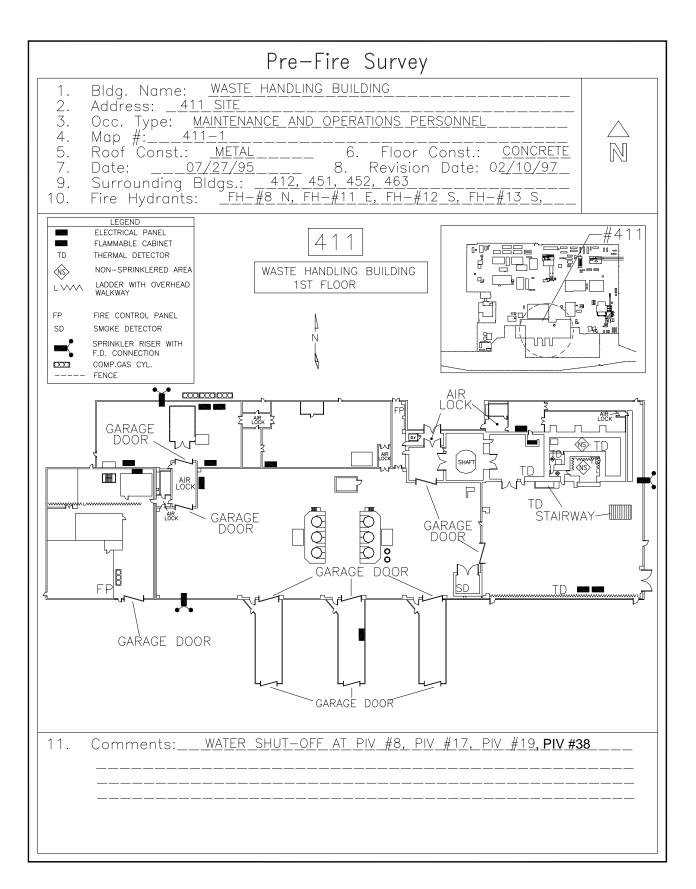


Figure F-10
Waste Handling Building Pre-Fire Survey (First Floor)

Pre-Fire Survey Cont.

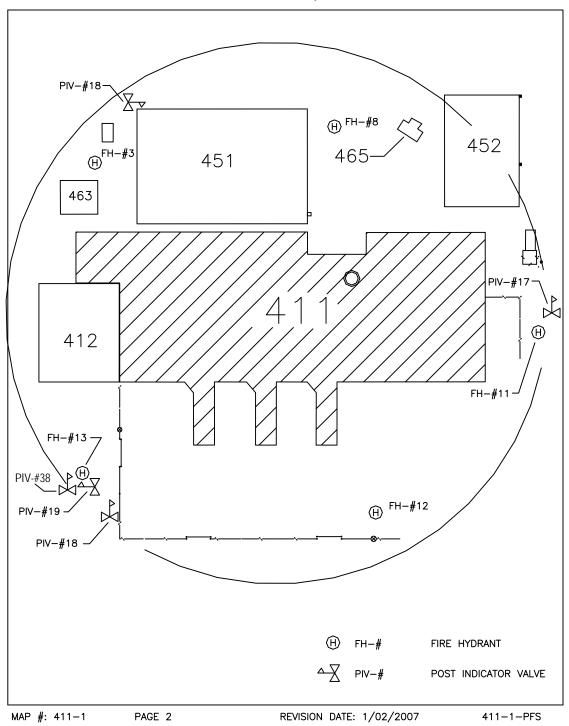


Figure F-10a
Waste Handling Building Pre-Fire Survey (First Floor)

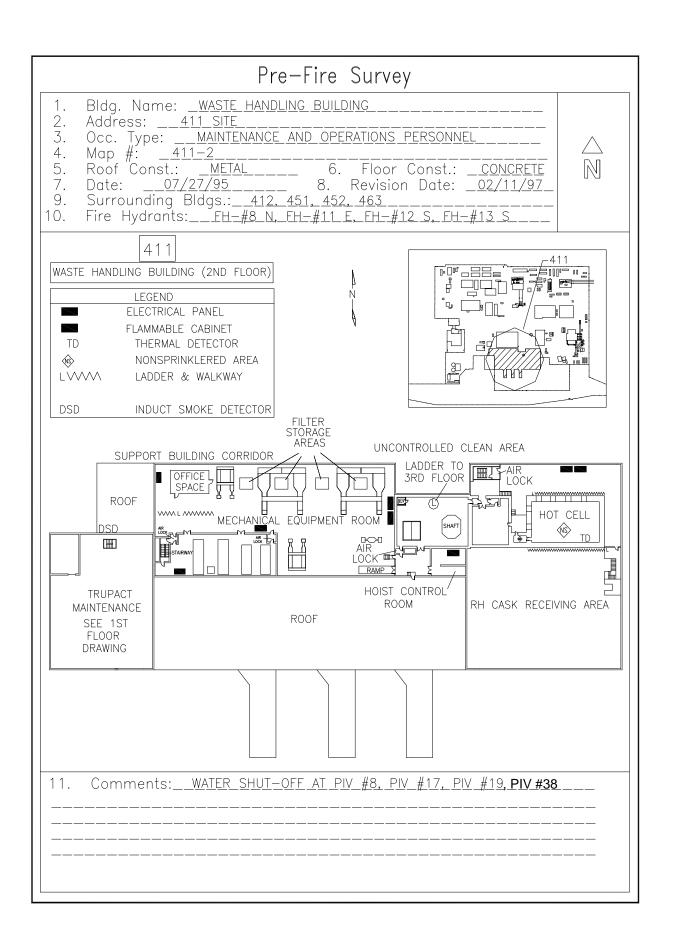


Figure F-11
Waste Handling Building Pre-Fire Survey (Second Floor)

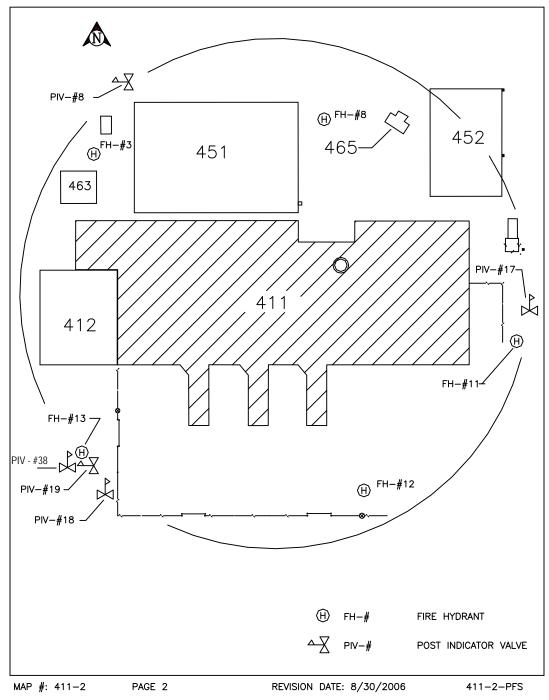


Figure F-11a
Waste Handling Building Pre-Fire Survey (Second Floor)