

Module IV		
Section	Change	Explanation of Change
Table of Contents	Changes made to the Table of Contents	Change for RH-TRU mixed waste and modified VOC Monitoring
IV.A.	This Module authorizes the management and disposal of contact-handled (CH) transuranic (TRU) mixed waste containers in the Underground Hazardous Waste Disposal Units (Underground HWDUs) identified herein. Specific facility and process information for the management and disposal of CH TRU mixed waste in the Underground HWDUs is incorporated in Permit Attachment M2 (Geologic Repository).	To allow for receipt and disposal of CH and RH TRU mixed waste.
Table IV.A.1.	Add RH-TRU mixed waste to authorized disposal capacities.	This change is needed to include RH TRU mixed waste. Future Panels are included here because there is a pending Class 3 Permit Modification Request that authorizes Contact-Handled TRU Mixed Waste in future panels.
IV.C.1.f.	<u>RH canisters or RH Facility canister - each canister as an individual unit.</u>	This adds RH TRU mixed waste canisters as an acceptable disposal container.
IV.D.1.	The average measured concentration of VOCs in the headspace gas of all containers and the average calculated emission rate of VOCs from the headspace gas of all containers in any single <u>open (active) rooms and all closed rooms in active panels</u> within an Underground HWDU shall not exceed the limits specified in Table IVD.1 below:	To provide for room-based VOC monitoring as provided by Section 311 Pub. L. 108-137 and Section 310 Pub. L. 108-447. The justification for this change is provided in Section 1.3 of the Revised PMR.
Table IV.D.1.	VOC Room-Based Emission Rate Limit (mole/room/year) 4250 5500 4860 2800 1160 53650 1300 4780 14880 There are no maximum concentration or emission rate limits for other VOCs.	This deletion is being made because the emission rate limits in moles/room/year were originally intended to be used in conjunction with headspace gas VOC measurements to determine VOC emissions from open and closed disposal rooms. Since the room-based VOC monitoring program will directly measure VOCs inside disposal rooms, the emission rate limits are no longer needed.

Section	Change	Explanation of Change
IV.D.2.	The Permittees shall confirm the VOC concentration and emission rate limits identified in Permit Condition IV.D.1 using the following procedures <u>VOC Monitoring Plan. The Permittees shall conduct monitoring of VOCs as specified in Permit Condition IV.F.2 and as described in Permit Attachment N.</u>	This change reflects the fact that the Permittees are performing room based monitoring as indicated within Attachment N and that emission rate limits are no longer applicable. In Attachment N, the VOC Monitoring Plan has two components, the Confirmatory VOC Monitoring which is the existing VOC monitoring program and the Disposal Room VOC Monitoring which is the VOC monitoring program mandated by Section 311/310.
IV.D.2.a	IV.D.2.a- VOC Confirmatory Monitoring - the Permittees shall conduct confirmatory monitoring of VOCs as specified in Permit Condition IV.F.2.	Because of the proposed wording in Proposed Condition IV.D.2, this reference to the Confirmatory VOC Monitoring is not longer needed.
IV.D.2.c.	IV.D.2.c- WIPP Waste Information System (WWIS) Report - the Secretary shall have the capability of generating a report from the WWIS database, or equivalent, for identifying the average concentrations and total emission rates of the VOCs specified in Table IV.D.1 on a room and panel basis, based upon the actual waste containers disposed, the VOC headspace gas sampling data for those containers, and the filter diffusion characteristics for those containers.	This section is being deleted because it is no longer necessary to tally the headspace gas VOC measurements for individual rooms to determine compliance with WIPP environmental performance standards. Instead, the room-based VOC monitoring program will directly measure VOCs inside disposal rooms.
IV.F.2.a.	<u>Implementation of Confirmatory VOC Monitoring Plan</u> - the Permittees shall implement the <u>Confirmatory VOC Monitoring Plan</u> <u>confirmatory VOC monitoring as</u> specified in Permit Attachment N (Confirmatory Volatile Organic Compound Monitoring Plan) and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.602 and §264.601(c)). The Permittees shall implement this plan within thirty (30) calendar days of issuance of this Permit until the certified closure of all Underground HWDUs.	This change clarifies that the Permit Attachment N include plans for both confirmatory VOC monitoring (i.e., monitoring at stations VOC-A and VOC-B), and room-based VOC monitoring.

Section	Change	Explanation of Change
IV.F.2.b.	Reporting requirements <u>for Confirmatory VOC Monitoring</u> - the Permittees shall submit to the Secretary an annual report, beginning twelve (12) months after issuance of this permit, describing the implementation and presenting the data and analysis of the Confirmatory VOC Monitoring Plan <u>for Confirmatory VOC monitoring</u> . This report shall also present data from the WWIS as specified in Permit Condition IV.D.2.b and correlate this data, using appropriate statistical methods, with data from the Confirmatory VOC Monitoring Plan.	This change is necessary to maintain the distinction between the reporting requirements for the confirmatory and room-based VOC monitoring programs. This change also eliminates the use of Headspace Gas Measurements to determine compliance with environmental performance standards.
IV.F.2.c.	Notification requirements <u>for Confirmatory VOC Monitoring</u>	This change is necessary to maintain the distinction between the notification requirements for the confirmatory and room-based VOC monitoring programs.
IV.F.2.d.	Remedial action <u>for Confirmatory VOC Monitoring</u>	This change is necessary to maintain the distinction between the remedial action provisions for the confirmatory and room-based VOC monitoring programs.
IV.F.2.e.	<u>IV.F.2.e.</u> <u>Implementation of Disposal Room VOC Monitoring - The Permittees shall implement disposal room VOC monitoring specified in Permit Attachment N.</u>	This change clarifies that Permit Attachment N include plans for both confirmatory VOC monitoring (i.e., monitoring at stations VOC-A and VOC-B), and room-based VOC monitoring.
IV.F.2.f.	<u>IV.F.2.f.</u> <u>Reporting Requirements for Disposal Room Monitoring - The Permittees shall notify the Secretary in writing, within five (5) working days of obtaining validated analytical results, whenever the concentration of any VOC specified in Table IV.D.1 in any closed room in an active panel or in any immediately adjacent closed room exceeds the action levels specified in Table IV.F.2.g.</u>	This change provides for the reporting and notification requirements for the room-based VOC monitoring program.
Table IV.F.2.g.	Table IV.F.2.g. was added	This table shows the action levels related to the room-based VOC monitoring program.

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IV.F.2.g.	<p><u>IV.F.2.g. Remedial Action for Disposal Room Monitoring - upon receiving validated analytical results that indicate one or more of the VOCs specified in Table IV.D.1 in any of the closed rooms in an active panel has reached a concentration of one half of the limit in Table IV.D.1, the sampling frequency for such closed rooms will increase to once per week. The once per week sampling will continue either until the concentrations in the closed rooms fall below one half of the limits in Table IV.D.1, or until closure of Room 1 of the panel, whichever occurs first. If one or more of the VOCs in Table IV.D.1 reaches a concentration of 95 percent in the closed room immediately adjacent to the active room, another sample will be taken to confirm the existence of such a condition. If the second sample confirms that the immediately adjacent closed room is at the 95 percent action level in Table IV.F.2.g, the active open room will be abandoned, ventilation barriers will be installed as specified in Permit Condition IV.E.3.c, waste emplacement will proceed in the next open room, and monitoring of the subject closed room will continue at a frequency of once per week until commencement of panel closure.</u></p>	<p>This change provides for the action requirements related to the room-based VOC monitoring program.</p>
IV.G.	<p>The Permittees shall inspect the Underground HWDUs at least weekly, as specified in Permit Attachment D (Inspection Schedule/Procedures, Tables D-1 <u>and D-1a</u>), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15).</p>	<p>This references the new Table in Attachment D for equipment related to RH emplacement.</p>
IV.H.2.	<p>3. Row Number <u>(for CH TRU mixed waste) or Borehole Number (for RH TRU mixed waste)</u> 4. Column Number <u>(for CH TRU mixed waste)</u> 5. Column Height <u>(for CH TRU mixed waste)</u></p>	<p>These changes reflect what data fields in the WWIS need to be completed for CH and RH waste.</p>