

From: [Patterson, Russ - DOE](#)
To: [Tom Peake](#); [Franco, Jose - DOE](#); [Basabilvazo, George - DOE](#)
Cc: [Jonathan Edwards](#); [Alan Perrin](#); [Jonathan Walsh](#); [Kathleen Economy](#); [Shankar Ghose](#); stone.nick@epa.gov; Lee.Raymond@epamail.epa.gov; [Kouba, Steve - WRES](#); [Chavez, Art V. - RES](#)
Subject: RE: Magnesium Oxide Supersack size reduction and alternative emplacement plan
Date: Friday, July 13, 2012 1:36:46 PM

Tom

Thanks for making our previous verbal discussions official. I will see you next week, during your site visit.

Russ

From: Tom Peake [mailto:Peake.Tom@epamail.epa.gov]
Sent: Friday, July 13, 2012 12:51 PM
To: Franco, Jose - DOE; Patterson, Russ - DOE; Basabilvazo, George - DOE
Cc: Jonathan Edwards; Alan Perrin; Jonathan Walsh; Kathleen Economy; Shankar Ghose; stone.nick@epa.gov; Lee.Raymond@epamail.epa.gov
Subject: Magnesium Oxide Supersack size reduction and alternative emplacement plan

Gentlemen,

We have reviewed your February 14, 2012 Planned Change Notice for Placement of Magnesium Oxide Supersacks. Thank you for notifying us, and giving us the opportunity to comment.

As you know, EPA's 1998 approval of a MgO safety factor of 1.2 was conditional upon the maintenance of that safety factor in each waste room, and the demonstration that the MgO backfill used is 96% reactive (letter to Dave Moody, Dated 2/11/08, EPA Air Docket number II-B3-104). EPA used its 2008 annual Emplacement Inspection, and subsequent inspections, to verify that DOE's procedures meet these conditions.

Based on your submission and prior observations, we have no objection to your modifying site procedures to allow the emplacement of fewer MgO supersacks if they are not necessary to meeting a room safety factor of 1.2. We believe that the changes described will not impact EPA's requirements for the maintenance of a MgO safety factor of 1.2 in each room as long as DOE appropriately tracks the material. We will use the upcoming 2012 Emplacement Inspection to review the revisions made to specific procedures, and verify that the conditions of EPA's 2008 approval continue to be met.

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