

## Citizens Advisory Board Idaho National Engineering and Environmental Laboratory

## Modification to the Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant

The Site-Specific Advisory Board (SSAB) for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

The INEEL CAB reviewed information available on the New Mexico Environment Department's Internet website titled "WIPP Information Page," (under the News heading titled "November 26, 2003"), including the "Dear Citizen Letter," Public Notice, and Fact Sheet. The three documents relate to a pending decision by New Mexico Environment Department that could result in modifications to the permit for the Waste Isolation Pilot Plant (WIPP) that would prohibit acceptance of additional waste streams, with limited and, as yet, undetermined, exceptions.

The text of the Fact Sheet refers to a table in the Transuranic Waste Baseline Inventory Report. It is the CAB's understanding that the table may, in the future, include new waste streams approved for disposal at WIPP. The table presently has no entries.

The INEEL CAB recommends that the New Mexico Environment Department approve modifications to the Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant to allow receipt of wastes for disposal at WIPP that have similar characteristics and are compatible with waste streams already permitted for disposal. One example of a waste stream similar to and compatible with waste streams already permitted for disposal at WIPP is the transuranic waste buried at the INEEL prior to 1970. This buried waste is very similar to transuranic waste stored aboveground at INEEL. (The stored waste is already permitted and is currently being shipped to WIPP.)

The INEEL CAB further recommends that New Mexico Environment Department characterize all waste streams proposed for disposal at WIPP and only those waste streams that are similar to and compatible with waste streams already permitted for disposal should be added to the existing permit. It is possible that some specific waste streams, such as portions of the liquid tank waste at INEEL, will meet specified criteria after treatment. This approach could potentially help prevent stranding of waste throughout the complex.

Finally, the INEEL CAB recommends that New Mexico Environment Department work with the Department of Energy to ensure that WIPP has adequate capacity to accommodate all wastes that are approved for disposal.

**Note:** The INEEL CAB has not reached consensus to support or oppose modification of the permit for WIPP to allow disposal of remote handled transuranic waste. It is assumed that the CAB will review that permit modification when released for public review. This recommendation should not be interpreted as addressing that separate issue. Furthermore, this recommendation should not be interpreted to indicate support or opposition to the reclassification of waste.

RECOMMENDATION # 112 March 23, 2004