



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 29 2016

OFFICE OF
AIR AND RADIATION

Todd A. Shrader
Manager, Carlsbad Field Office
4021 National Parks Hwy.
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dear Mr. Shrader:

The purpose of this letter is to request that the Department of Energy Carlsbad Field Office (DOE CBFO) provide to the Environmental Protection Agency documentation of its plans for testing and operation of interim and supplemental ventilation systems at the Waste Isolation Pilot Plant (WIPP). As we have discussed, the EPA provides oversight of the DOE's compliance with regulatory standards at 40 CFR part 191, subpart A, and 40 CFR part 61, subpart H (National Emission Standard for Hazardous Air Pollutants or NESHAP), with a focus on ensuring that the DOE limits radiation exposure to the public during operations. As part of this oversight, the EPA needs to have an opportunity to review applicable information, in this case, related to the DOE's expected changes to the ventilation at the WIPP.

We realize that the implementation of upgrades to the WIPP's ventilation systems is critical to the resumption of more normal operations at the WIPP. As you know, an appropriate regulatory review is important to maintain stakeholder confidence in WIPP operations. Our review of the interim ventilation system is to make sure that the measurements taken at Station B remain representative of filtered repository exhaust.

It is our understanding that the DOE is planning a "bump test" of the supplemental ventilation unit in the near future. However, DOE has not provided the EPA with information on the nature of the supplemental ventilation or its expected general operation. We do understand, however, that it would create an airflow path that would be unfiltered. The EPA previously expressed its concern when the DOE moved the unit into the underground without prior notification or documentation. We are also concerned that further action to test the equipment may be pursued before the EPA has had sufficient time to review the appropriate documentation and conduct any inspections as necessary.

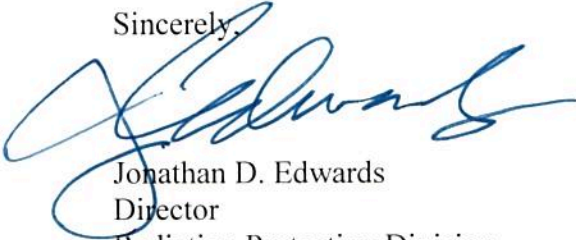
The EPA's primary concern is to ensure that all exhaust from the underground is properly monitored and, if necessary, filtered to avoid releases of radioactive material to the general environment. To that end, we are requesting documentation from the DOE that addresses:

- Qualification of Station B as the designated point of compliance for the radionuclide NESHAP in 40 CFR part 61, subpart H;
- Monitoring of the exhaust from the underground, including plans for restoring continuous radiological monitoring of the underground;
- Testing of interim and supplemental ventilation units, including ramp-up procedures and testing criteria (e.g., equipment settings, sequencing and evaluation);

- Control of exhaust streams during testing to ensure no release of unfiltered exhaust to the surface; and
- Operating parameters during normal and off-normal situations.

I appreciate your cooperation in this matter. Several members of my staff, including Tom Peake, director of the Center for Waste Management and Regulations, will be in New Mexico to meet with your staff in early February. He will be available to discuss this topic further at that time. In the meantime, if you or your staff need further information, please let me know, or contact Tom Peake at (202) 343-9765.

Sincerely,



Jonathan D. Edwards
Director
Radiation Protection Division