



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
December 27, 2002



**DEC 2002**

Mr. Steve Zappe, Project Leader (WIPP)  
Hazardous Waste Permits Program  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 E. Rodeo Park Drive, Bldg. 1  
Santa Fe, NM 87502-6303

Subject: Notification of a Class 1 Permit Modification to the Hazardous Waste Facility  
Permit for Changing the Corporate Name of the Co-permittee, Permit Number:  
NM4890139088-TSDF

Dear Mr. Zappe:

The purpose of this letter is to submit this notification of a Class 1 modification to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Number NM4890139088-TSDF. The proposed changes do not compromise worker safety, human health, or the environment. The purpose of this modification is to change the corporate name of the co-permittee from Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

If you have any questions regarding this submittal, please contact Mr. Jody Plum at (505) 234-7462.

Sincerely,

Dr. Inés R. Triay, CBFO Manager  
U.S. Department of Energy

J.L. Lee, General Manager  
Westinghouse TRU Solutions LLC

Enclosure



Mr. Steve Zappe

-2-

December 27, 2002

cc: w/enclosure  
C. Walker, Techlaw

cc: w/o enclosure  
J. Bearzi, NMED  
J. Kieling, NMED

**Class 1 Permit Modification Notification**

**Name Change**

**Waste Isolation Pilot Plant  
Carlsbad, New Mexico**

**WIPP HWFP #NM4890139088-TSDF**

**December 9, 2002**

## **Transmittal Letter**

|



**Department of Energy**

Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

December 27, 2002

Mr. Steve Zappe, Project Leader (WIPP)  
Hazardous Waste Permits Program  
Hazardous Waste Bureau  
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Handwritten signature of Inés R. Triay in black ink.

Dr. Inés R. Triay, CBFO Manager  
U.S. Department of Energy

Handwritten signature of J.L. Lee in black ink.

J.L. Lee, General Manager  
Westinghouse TRU Solutions LLC

Enclosure

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## Acronyms and Abbreviations

CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	Department of Energy
ECP	Engineering Change Proposal
EOC	Emergency Operations Center
ES&H	Environment, Safety, and Health
FSM	Facility Shift Manager
HWA	Hazardous Waste Act
HWDU	Hazardous Waste Disposal Units
HWFP	Hazardous Waste Facility Permit
MOC	Management and Operating Contractor
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PMN	Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
TRU	Transuranic
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**), Carlsbad Field Office (**CBFO**) 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 40 Code of Federal Regulations (**CFR**) §270.42(a)). The PMN in this document is necessary to inform the New Mexico Environment Department (**NMED**) of a company name change of one of the Permittees. 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 related supporting documents are provided in this PMN. The proposed modification to the text of the WIPP HWFP has been identified using a double underline and revision bar in the right hand margin for added information, and a ~~strikeout~~ 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**

No.	Affected Permit Section	Item	Category	Attachment A Page #
1	a. Module I b. Attach A c. Attach F d. Attach H e. Attach H2 f. Attach I1 g. Attach I1G h. Attach L i. Attach N j. Attach O	Name Change for Management and Operating Contractor from Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC.	A.1	A-3

## Item 1

### Description:

Revise the HWFP to change Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC in Module 1 and subsequently change references to Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC throughout the HWFP.

### Basis:

The change is administrative and informational in nature and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1). The recent name change for the MOC to Washington TRU Solutions LLC has prompted this modification.

### Discussion:

On January 1, 2003, Westinghouse TRU Solutions LLC changed its name to Washington TRU Solutions LLC to more adequately reflect the corporate structure of the MOC.

### Revised Permit Text:

a. 1. Module I, Section I.A. EFFECT OF PERMIT

The Secretary of the New Mexico Environment Department (**Secretary**) issues this Permit to the United States Department of Energy (**DOE**), the owner and co-operator of the Waste Isolation Pilot Plant (**WIPP**) (EPA I.D. Number NM4890139088), and ~~Westinghouse~~ Washington TRU Solutions LLC, Management and Operating Contractor (**MOC**), the co-operator of WIPP. This Permit authorizes DOE and MOC (**the Permittees**) to manage, store, and dispose contact-handled transuranic (**TRU**) mixed waste at WIPP, and establishes the general and specific standards for these activities, pursuant to the New Mexico Hazardous Waste Act (**HWA**), NMSA 1978, §§74-4-1 et. seq. (Repl. Pamp. 1993) and the New Mexico Hazardous Waste Regulations, 20.4.1.100 NMAC et. seq.

a.2. Module I, Section I.D.3. Permittees

"Permittees" means the United States Department of Energy (**DOE**), an agency of the Federal government, and the owner and co-operator of the WIPP facility; and ~~Westinghouse~~ Washington TRU Solutions LLC, Management and Operating Contractor (**MOC**), the co-operator of the WIPP facility.

b.1. Attachment A, Section A-1

NAME OF FACILITY: Waste Isolation Pilot Plant

OWNER and CO-OPERATOR: U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221

CO-OPERATOR: ~~Westinghouse~~ Washington TRU Solutions LLC  
P.O. Box 2078  
Carlsbad, NM 88221

RESPONSIBLE OFFICIALS: Inés Triay, Manager  
DOE/Carlsbad Field Office  
John Lee, General Manager  
~~Westinghouse~~ Washington TRU Solutions LLC

FACILITY MAILING ADDRESS: U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221

FACILITY LOCATION: 30 miles east of Carlsbad on the Jal  
Highway, in Eddy County.

TELEPHONE NUMBER: 505/234-7300

U.S. EPA I.D. NUMBER: NM4890139088

GEOGRAPHIC LOCATION: 32° 22' 30" N  
103° 47' 30" W

DATE OPERATIONS BEGAN: November 26, 1999

c.1. Attachment F, Introduction

The WIPP facility is owned and co-operated by the Department of Energy (**DOE**) and co-operated by its designated Management and Operating Contractor (**MOC**) (Permit Condition I.D.3) ~~which is currently Westinghouse TRU Solutions LLC.~~

d.1. Attachment H, Introduction

The training requirements apply to all appropriate employees of the U.S. Department of Energy (**DOE**); ~~the Management and Operating Contractor (MOC), Westinghouse TRU Solutions LLC; the Scientific Advisor, Sandia National Laboratories;~~ and contractors who regularly work at the facility that may come in contact with and/or manage hazardous waste. The WIPP Project training program is comprehensive and applies to all areas of personnel performance and development. This chapter describes the introductory and continuing training provided to personnel at the WIPP facility, with emphasis on those facility personnel and their supervisors whose jobs are such that their actions or failure to act could result in a spill or release, or the immediate threat of a spill or release of hazardous waste. These personnel are directly involved with hazardous waste management at the WIPP facility. Their training allows them to operate the facility safely and in compliance with hazardous waste regulations.

e.1 Attachment H2

**COURSE:** GET-19X/GET-20X - General Employee Training

**DURATION:** ~16 Hours

**PREREQUISITES:** None

**SCOPE:**

**TYPE:** Classroom

**OBJECTIVES:** Upon completion of this course, the student will be able to perform their job in a safe manner and will have an overview of the site organization and description.

Mastery of the terminal objectives will be demonstrated by scoring 80 percent or higher on the course examination.

**REFRESHER:** GET-19XA/GET-20XA annually

**COURSE DESCRIPTION** (by module)

8. Work Policies and Procedures  
 ≈1 hour
- a. DOE Orders and ~~Westinghouse~~ TRU Solutions MOC Procedures
  - b. Teamwork
  - c. Conduct of Operations Policy
    - 1. Elements of Conduct of Ops
  - d. Quality Assurance Program
  - e. Responsibility for following procedures
  - f. Resuming work after stoppage
  - g. Stopping work for unsafe acts
  - h. Purpose and uses of "Hold Tag"
  - i. Quality records and requirements
  - j. Correcting errors on QA Records
  - k. Configuration Management and affected departments

e.2. Attachment H2

**COURSE:** SAF-630/631 - Respiratory Protection

**DURATION:** ≈8 hours

**PREREQUISITES:** Medical physical

**TYPE:** Classroom and Practical

**SCOPE:** This program contains the requirements of respiratory protection as outlined in 29 CFR 1910.134, 10 CFR 20, ANSI, Z88.2-1980 and applicable WIPP procedures.

**OBJECTIVE:** Upon completion of this course the trainee will demonstrate a knowledge of the WIPP respiratory protection program; respiratory health hazards; and types of respiratory protection devices, their proper use and limitations.

Mastery of the terminal objective will be demonstrated by scoring 80% or higher on a closed book lesson examination.

## COURSE DESCRIPTION (by lesson)

### 1. Introduction

~2 hours

#### A. Basic Requirements

- a. Regulations
- b. DOE Orders
- c. Industry Standards
- d. ~~Westinghouse TRU Solutions~~
- e. WIPP Procedures
  1. Physical exam
  2. Pulmonary test
  3. Training
  4. Fit Testing
  5. Identification of potential respirator activities

#### f.1. Attachment I1, **List of Abbreviations/Acronyms**

ACI	American Concrete Institute
AISC	American Institute for Steel Construction
*CFR	Code of Federal Regulations
cm	centimeter
°C	degrees celsius
°F	degrees Fahrenheit
DOE	U.S. Department of Energy
DRZ	disturbed rock zone
EEP	Excavation Effects Program
ESC	expansive salt-saturated concrete
FLAC	Fast Lagrangian Analysis of Continua
ft	foot (feet)
GPR	ground-penetrating radar
Kips	1,000 pounds
m	meter(s)
MB 139	Marker Bed 139
<u>MOC</u>	<u>Management and Operating Contractor (Permit Condition I.D.3)</u>
MPa	megapascal(s)
MSHA	Mine Safety and Health Administration
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NaCl	sodium chloride
NMVP	no-migration variance petition

psi	pound(s) per square inch
RCRA	Resource Conservation and Recovery Act
SMC	Salado Mass Concrete
TRU	transuranic
VOC	volatile organic compound(s)
<del>Westinghouse</del>	<del>Westinghouse TRU Solutions LLC</del>
WIPP	Waste Isolation Pilot Plant

f.2. Attachment I1, **Executive Summary** Section

**Scope.** Under contract to ~~Westinghouse TRU Solutions LLC~~ the Management and Operating Contractor (Westinghouse)MOC, IT Corporation has prepared a detailed design of a panel-closure system for the Waste Isolation Pilot Plant (WIPP). Preparation of this detailed design of an operational-phase closure system is required to support a Resource Conservation and Recovery Act (RCRA) Part B permit application. This report describes the detailed design for a panel-closure system specific to the WIPP site. The recommended panel-closure system will adequately isolate the waste-emplacement panels for at least 35 years.

g.1.Attachment I1G, **Section 01010 - Summary of Work**

**Part 1 - General**

**Abbreviations/Acronyms**

ACI	American Concrete Institute
AISC	American Institute for Steel Construction
ANSI	American National Standards Institute
ASTM	American Society for Testing and Materials
AWS	American Welding Society
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
DRZ	Disturbed rock zone
EPA	U.S. Environmental Protection Agency
MB 139	Marker Bed 139
MSHA	U.S. Mine Safety and Health Administration
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
MOC	Management and Operating Contractor ( <u>Permit Condition I.D.3</u> ), <del>Westinghouse TRU Solutions, LLC</del>
RCRA	Resource Conservation and Recovery Act
SMC	Salado Mass Concrete
USACE	U.S. Army Corps of Engineers
<del>Westinghouse</del>	<del>Westinghouse TRU Solutions LLC</del>
<del>WID</del>	<del>Waste Isolation Division</del>



g.2. Attachment I1G, **Section 01090 - Reference Standards****Part 1 - General****Section 1.3 Schedule of References**

~~WID~~MOC ~~Westinghouse~~Washington TRU Solutions LLC  
Carlsbad, New Mexico 88221

## h. 1. Attachment L, Figure L-17a

Revised Figure L-17a is included in Attachment B. Figure was revised to remove the name and address of the MOC and replace it with a reference to enter the current name and address of the MOC.

## h. 2. Attachment L, Figure L-17b

Revised Figure L-17b is included in Attachment B. Figure was revised to remove the name and address of the MOC and replace it with a reference to enter the current name and address of the MOC.

i.1. Attachment N, **Acronyms and Abbreviations** Section

BFB	4-Bromofluorobenzene
BS/BSD	blank spike/blank spike duplicate
CH	Contact-handled
CLP	Contract Laboratory Program
COC	concentration of concern
CRQL	contract-required quantitation limit
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
ft	feet
FTIR	Fourier transform infrared spectrometry
g/mol	grams per mole
GC/MS	gas chromatography/mass spectrometry
HWDU	Hazardous Waste Disposal Unit
LCS	laboratory control sample
m	meter
MDL	method detection limit
MOC	Management and Operating Contractor ( <u>Permit Condition I.D.3</u> ); <del>Westinghouse TRU Solutions LLC</del>
MRL	method reporting limit
NIST	National Institute of Standards and Testing

NMAC	New Mexico Administrative Code
ppbv	parts per billion by volume
QA	quality assurance
QAPD	Quality Assurance Program Description
QAPjP	Quality Assurance Project Plan
QC	quality control
RCRA	Resource Conservation and Recovery Act
RPD	relative percent difference
SOP	standard operating procedure
SOW	statement of work
TIC	tentatively identified compound
TRU	Transuranic
VOC	volatile organic compound
WIPP	Waste Isolation Pilot Plant

i.2. Attachment N, Figure N-3

Revised Figure N-3 is included in Attachment B. Figure was revised to remove the name and address of the MOC and replace it with a reference to enter the current name and address of the MOC.

j.1. Attachment O, Part A Application

A revised Part A Application is included in Attachment B

**Attachment B**

**Attachment L, Figure L-17a**  
**Example Chain-of-Custody Form**

Chain of Custody Record

{MOC Name and Address} \_\_\_\_\_ C of C Control No. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ RFA Control No. \_\_\_\_\_

SAMPLING PROGRAM \_\_\_\_\_ LAB DESTINATION \_\_\_\_\_

SAMPLE TEAM MEMBERS \_\_\_\_\_ CARRIER/WAYBILL NO. \_\_\_\_\_

Sample Number	Sample Location and Description	Date and Time Collected	Sample Type	Container Type	Condition on Receipt (Name and Date)	Disposal Record No.

Special Instructions \_\_\_\_\_  
Possible Sample Hazards: \_\_\_\_\_  
Signatures: (Name, Company, Date and Time):  
1. Relinquished By: \_\_\_\_\_  
   Received By: \_\_\_\_\_  
   3. Relinquished By: \_\_\_\_\_  
   Received By: \_\_\_\_\_  
2. Relinquished By: \_\_\_\_\_  
   Received By: \_\_\_\_\_  
   4. Relinquished By: \_\_\_\_\_  
   Received By: \_\_\_\_\_

**Attachment L, Figure L-17b**  
**Example Request for Analysis Form**

## REQUEST FOR ANALYSIS

{MOC Name and Address}

R/A Control \_\_\_\_\_  
 C/C Control No. \_\_\_\_\_  
 Date Sample Shipped \_\_\_\_\_  
 Lab Destination \_\_\_\_\_  
 Laboratory Contact \_\_\_\_\_  
 Send Lab Report To \_\_\_\_\_

VOC Monitoring Program \_\_\_\_\_

Date Report Required \_\_\_\_\_  
 Project Contact \_\_\_\_\_  
 Project Contact Phone No. \_\_\_\_\_

Purchase Order No. \_\_\_\_\_

Serial No.	Sample No.	C-of-C No.	Sample Type	Sample Pressure	Preservative	Contract-Specific Testing	Special Instructions

TURNAROUND TIME REQUIRED: (Rush must be approved by appropriate Manager) NORMAL \_\_\_\_\_ RUSH \_\_\_\_\_ (Subject to rush surcharge)  
 POSSIBLE HAZARD IDENTIFICATION: (Please indicate if sample(s) are hazardous materials and/or contain high levels of hazardous substances.)  
 NONHAZARD \_\_\_\_\_ FLAMMABLE \_\_\_\_\_ SKIN IRRITANT \_\_\_\_\_ HIGHLY TOXIC \_\_\_\_\_ BIOLOGICAL \_\_\_\_\_ OTHER \_\_\_\_\_

SAMPLE DISPOSAL (Please indicate disposition of sample following analysis.) RETURN TO CLIENT \_\_\_\_\_ DISPOSAL BY LAB \_\_\_\_\_ (Please Specify)

FOR LAB USE ONLY  
 RECEIVED BY \_\_\_\_\_ DATE/TIME \_\_\_\_\_

**Attachment N, Figure N-3**  
**Example Request for Analysis Form**



# REQUEST FOR ANALYSIS

{MOC Name and Address}

R/A Control \_\_\_\_\_  
 C/C Control No. \_\_\_\_\_  
 Date Sample Shipped \_\_\_\_\_  
 Lab Destination \_\_\_\_\_  
 Laboratory Contact \_\_\_\_\_  
 Send Lab Report To \_\_\_\_\_

VOC Monitoring Program \_\_\_\_\_

Date Report Required \_\_\_\_\_  
 Project Contact \_\_\_\_\_  
 Project Contact Phone No. \_\_\_\_\_

Purchase Order No. \_\_\_\_\_

Serial No.	Sample No.	C-of-C No.	Sample Type	Sample Pressure	Preservative	Contract-Specific Testing	Special Instructions

TURNAROUND TIME REQUIRED: (Rush must be approved by appropriate Manager) NORMAL \_\_\_\_\_ RUSH \_\_\_\_\_ (Subject to rush surcharge)  
 POSSIBLE HAZARD IDENTIFICATION: (Please indicate if sample(s) are hazardous materials and/or contain high levels of hazardous substances.)  
 NONHAZARD \_\_\_\_\_ FLAMMABLE \_\_\_\_\_ SKIN IRRITANT \_\_\_\_\_ HIGHLY TOXIC \_\_\_\_\_ BIOLOGICAL \_\_\_\_\_ OTHER \_\_\_\_\_

SAMPLE DISPOSAL (Please indicate disposition of sample following analysis.) RETURN TO CLIENT \_\_\_\_\_ DISPOSAL BY LAB \_\_\_\_\_ (Please Specify)

FOR LAB USE ONLY  
 RECEIVED BY \_\_\_\_\_ DATE/TIME \_\_\_\_\_

**Attachment O, Figure O-Part A**

For EPA Regional Use Only	 United States Environmental Protection Agency Washington, DC 20460 <h2 style="margin: 0;">Hazardous Waste Permit Application</h2> <h3 style="margin: 0;">Part A</h3> <p style="font-size: small; color: gray;">(Read the Instructions before starting)</p>	
Date Received		
Month    Day    Year		

**I. Facility's EPA ID Number (Mark 'X' in the appropriate box)**

<input type="checkbox"/> A. First Part A Submission	<input checked="" type="checkbox"/> B. Revised Part A Submission (Amendment # <u>4213</u> )
---	---

C. Facility's EPA ID Number N M 4 8 9 0 1 3 9 0 8 8	D. Secondary ID Number (If applicable)
--	--

**II. Name of Facility**  
W A S T E I S O L A T I O N P I L O T P L A N T

**III. Facility Location (Physical address not P.O. Box or Route Number)**

**A. Street**  
3 0 M I L E S E A S T O F C A R L S B A D O N

**Street (Continued)**  
J A L H I G H W A Y

<b>City or Town</b> C A R L S B A D	<b>State</b> N M	<b>Zip Code</b> 8 8 2 2 1 -
<b>County Code (if known)</b> 0 3	<b>County Name</b> E D D Y	

<b>B. Land Type</b> (Enter code) F	<b>C. Geographic Location</b> LATITUDE (Degrees, minutes, & seconds)    LONGITUDE (Degrees, minutes & seconds) 3 2 2 2 3 0 N    1 0 3 4 7 3 0 W	<b>D. Facility Existence Date</b> Month    Day    Year 0 5 1 8 1 9 8 1
--	---	--

**IV. Facility Mailing Address**

**Street or P.O. Box**  
P O B O X 3 0 9 0

<b>City or Town</b> C A R L S B A D	<b>State</b> N M	<b>Zip Code</b> 8 8 2 2 1 - 3 0 9 0
--	---------------------	--

**V. Facility Contact (Person to be contacted regarding waste activities at facility)**

<b>Name (Last)</b> T R I A Y	<b>(First)</b> I N È S
<b>Job Title</b> M A N A G E R	<b>Phone Number (Area Code and Number)</b> 5 0 5 - 2 3 4 - 7 3 0 0

**VI. Facility Contact Address (See instructions)**

<b>A. Contact Address</b> Location Mailing    Other <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<b>B. Street or P.O. Box</b> P O B O X 3 0 9 0	
<b>City or Town</b> C A R L S B A D	<b>State</b> N M	<b>Zip Code</b> 8 8 2 2 1 - 3 0 9 0

## RCRA PART A APPLICATION CERTIFICATION

The U.S. Department of Energy (DOE), through its Carlsbad Field Office, has signed as "owner and operator," and ~~Westinghouse~~Washington TRU Solutions LLC, the Management and Operating Contractor (MOC), has signed this application for the permitted facility as "co-operator."

The DOE has determined that dual signatures best reflect the actual apportionment of Resource Conservation and Recovery Act (RCRA) responsibilities as follows:

The DOE's RCRA responsibilities are for policy, programmatic directives, funding and scheduling decisions, Waste Isolation Pilot Plant (WIPP) requirements of DOE generator sites, auditing, and oversight of all other parties engaged in work at the WIPP, as well as general oversight.

The MOC's RCRA responsibilities are for certain day-to-day operations (in accordance with general directions given by the DOE and in the Management and Operating Contract as part of its general oversight responsibility), including, but not limited to, the following: certain waste handling, monitoring, record keeping, certain data collection, reporting, technical advice, and contingency planning.

For purposes of the certification required by Title 20 of the New Mexico Administrative Code, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, §270.11(d), the DOE's and the MOC's representatives certify, under penalty of law that this document and all attachments were prepared under their direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on their inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of their knowledge and belief, true, accurate, and complete for their respective areas of responsibility. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner and Operator Signature: Original signed by Inés Triay  
Title: Manager, Carlsbad Field Office  
for: U.S. Department of Energy  
Date: \_\_\_\_\_

Co-Operator Signature: Original signed by John L. Lee  
Title: General Manager  
for: ~~Westinghouse~~Washington TRU Solutions LLC  
Date: \_\_\_\_\_

<b>EPA ID Number (Enter from page 1)</b>												<b>Secondary ID Number (Enter from page 1)</b>											
N	M	4	8	9	0	1	3	9	0	8	8	Formatted											
<b>XV. Map</b>																							
<p>Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.</p>																							
<b>XVI. Facility Drawing</b>																							
<p>All existing facilities must include a scale drawing of the facility (See instructions for more detail).</p>																							
<b>XVII. Photographs</b>																							
<p>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).</p>																							
<b>XVIII. Certification(s)</b>																							
<p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>																							
Owner Signature												Date Signed											
Name and Official Title (Type or print) Inès R.Triay, Manager, DOE/Carlsbad Field Office																							
Owner Signature												Date Signed											
Name and Official Title (Type or print)																							
Operator Signature												Date Signed											
Name and Official Title (Type or print) Inès R.Triay, Manager, DOE/Carlsbad Field Office																							
Operator Signature												Date Signed											
Name and Official Title (Type or print) John L. Lee, President and General Manager – Westinghouse <i>Washington</i> TRU Solutions, LLC																							
<b>XIX. Comments</b>																							
Section XVIII Operator Signature - *See attached "RCRA Part A Application Certification"																							
<ul style="list-style-type: none"> <li>Date of submittal of clarifying information as requested by NMED, May 28, 1996</li> <li>Additional data were submitted on July 9, 1991; November 12, 1992; January 29, 1993; March 2, 1995; May 26, 1995; April 12, 1996; May 29, 1996; April 21, 1999; May 10, 1999; and February 2, 2001</li> <li>Part A originally signed on January 18, 1991, and submitted on January 22, 1991.</li> </ul>																							
<p><b>Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)</b></p>																							