



**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221  
**DEC 16 2011**



Mr. J. Kieling, Acting Chief  
 Hazardous Waste Bureau  
 New Mexico Environment Department  
 2905 Rodeo Park Drive East, Building 1  
 Santa Fe, New Mexico 87505-6303

Subject: Notification of Class 1 Permit Modification to the Hazardous Waste Facility  
 Permit, Number: NM4890139088-TSDF

Dear Mr. Kieling:

Enclosed is the following Class 1 Permit Modification Notification:


- Continuing Training Timeframe

We certify under penalty of law that this document and the enclosure were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our 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 our knowledge and belief, true, accurate, and complete. We are 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, please contact Mr. Anthony Stone at 575-234-7475.

Sincerely,

  
 Edward Ziemianski, Interim Manager  
 Carlsbad Field Office

  
 M. F. Sharif, General Manager  
 Washington TRU Solutions LLC

Enclosure

cc: w/enclosure  
 T. Kliphuis, NMED  
 J. Davis, NMED  
 C. Walker, Trinity Engineering  
 CBFO M&RC  
 \*ED denotes electronic distribution

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**CLASS 1 PERMIT MODIFICATION NOTIFICATION**

**Continuing Training Timeframe**

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

**WIPP Permit Number - NM4890139088-TSDF**

**December 2011**

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## Overview of the Permit Modification Notification

This document contains a Class 1 Permit Modification Notification (**PMN**) to modify the Hazardous Waste Facility Permit (**Permit**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the Permit.

This PMN is being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with Permit Part 1.3.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (40 **CFR**) §270.42(a)). The PMN in this document is necessary to notify the New Mexico Environment Department (**NMED**) of a change which impacts the Permit Waste Analysis Plan and the WIPP facility. 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 Permit and any related supporting documents are provided in this PMN. The proposed modification to the text of the Permit has been identified using red text and double underline 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**

Affected Permit Section	Change Description	Category	Attachment A Page #
Permit Part 2, Condition 2.8.4, Attachment C3, Section C3-14	To clarify when continuing training is required the Permittees have added additional language indicating that the required training must occur by the end of the month of the anniversary date when the training was previously completed. These changes occur in Permit Part 2, Section 2.8 and Attachment C3, Section C3-14.	A.1	A-3

## **Item 1**

### **Description**

To clarify when continuing training is required the Permittees have added additional language indicating that the required training must occur by the end of the month of the anniversary date when the training was previously completed. These changes occur in Permit Part 2, Section 2.8 and Attachment C3, Section C3-14.

### **Basis**

The change is classified as an “administrative and informational change” and is, therefore, a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

### **Discussion**

In the WIPP program training and qualification courses have required refresher or requalification activities that must be completed every one or two years depending on the particular training program. For example, General Employee Training is required annually according to the Permit. It is not always practical to renew training on the exact anniversary date; therefore, the practice is to require the training to be completed by the end of the month of the anniversary date when the training was previously completed. This change is required to add this clarification to the Permit.

## Revised Permit Text

### 2.8 PERSONNEL TRAINING

The Permittees shall conduct personnel training, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16).

#### 2.8.1 Personnel Training Content

The personnel training program shall include the requirements specified in Permit Attachment F (Personnel Training) and Permit Attachment F2 (Training Course and Qualification Card Outlines), as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16).

#### 2.8.2 Personnel Training Requirements

The Permittees shall train all persons involved in the management of mixed and hazardous waste in procedures relevant to the positions in which they are employed, as specified in Permit Attachment F1 (RCRA Hazardous Waste Management Job Titles and Descriptions), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16).

#### 2.8.3. Personnel Training Records

The Permittees shall maintain training documents and records, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d) and (e)).

#### 2.8.4. Continuing Training

Continuing training required by this Permit on an annual or biennial basis must be completed by the end of the month of the anniversary date when the training was previously completed.



### C3-14 Special Training Requirements and Certifications

Before performing activities that affect WAP quality, all personnel are required to receive indoctrination into the applicable scope, purpose, and objectives of the WAP and the specific QAOs of the assigned task. Personnel assigned to perform activities for the WAP shall have the education, experience, and training applicable to the functions associated with the work. Evidence of personnel proficiency and demonstration of competence in the task(s) assigned must be demonstrated and documented. All personnel designated to work on specific aspects of the WAP shall maintain qualification (i.e., training and certification) throughout the duration of the work as specified in this WAP and applicable QAPjPs/procedures. Job performance shall be evaluated and documented at periodic intervals, as specified in the implementing procedures.

Personnel involved in WAP activities shall receive continuing training to ensure that job proficiency is maintained. The due date for required continuing training courses and requalification shall be the end of the month of the anniversary date when the training was previously completed. Training includes both education in principles and enhancement of skills. Each participating site shall include in its QAPjP a description of the procedures for implementing personnel qualification and training. All training records that specify the scope of the training, the date of completion, and documentation of job proficiency shall be maintained as QA Records in the site project file.