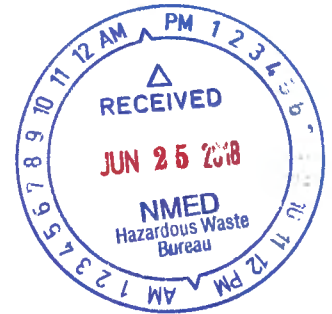




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221



JUN 22 2018

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

**Subject: Class 1 Permit Modification Notifications to the Waste Isolation Pilot Plant
 Hazardous Waste Facility Permit Number: NM4890139088-TSDF**

Dear Mr. Kieling:

Enclosed is a Notification of Class 1 Permit Modifications for the following items:

- Addition of Procedure to Attachment E, Table E-1
- Editorial Change to Attachment C7, Section C7-1a
- Update to Attachment D, Table D-1, Resource Conservation and Recovery Act
 Emergency Coordinators

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to 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. Michael R. Brown at (575) 234-7476.

Sincerely,

Todd Shrader, Manager
 Carlsbad Field Office

Bruce C. Covert, Project Manager
 Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure
 R. Maestas, NMED * ED
 D. Biswell, NMED ED
 M. McLean, NMED ED
 H. Tellez, NMED ED

CBFO M&RC
 *ED denotes electronic distribution



Class 1 Permit Modification Notifications

Addition of Procedure to Attachment E, Table E-1

Editorial Change to Attachment C7, Section C7-1a

**Update to Attachment D, Table D-1, Resource Conservation and Recovery Act
Emergency Coordinators**

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

WIPP Permit Number - NM489(0139088-TSDF

June 2018

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Overview of the Permit Modification Notifications

This document contains three Class 1 Permit Modification Notifications (**PMNs**) for the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit (**Permit**) Number NM4890139088-TSDF.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Nuclear Waste Partnership LLC, collectively referred to as the Permittees, in accordance with Permit Part 1, Section 1.3.1. (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (**CFR**) §270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of changes which impact the Permit. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in these PMNs. 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 Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Item No.	Affected Permit Section	Change Description	Category
1.	Addition of Procedure to Attachment E, Table E-1	This modification revises Permit Attachment E, Table E-1, <i>Inspection Schedule/Procedures</i> , to add procedure number "WP 12-ER3007" to the <i>Procedure Number and Inspection Criteria</i> column for the Mine Rescue Self-Contained Breathing Apparatus (SCBA) line item.	A.1
2.	Editorial Correction to Attachment C7, Section C7-1a	This modification revises a reference in Permit Attachment C7, Section C7-1a, <i>Confirmation of a Representative Subpopulation of the Waste</i> , from "Permit Attachment C3, Section C3-13" to "Permit Attachment C3, Section C3-7."	A.2
3.	Update to Attachment D, Table D-1 Resource Conservation and Recovery Act Emergency Coordinators	This modification updates the list of Resource Conservation and Recovery Act (RCRA) Emergency Coordinators in Permit Attachment D, <i>RCRA Contingency Plan</i> , Table D-1, <i>Resource Conservation and Recovery Act Emergency Coordinators</i> , by removing J. B. (James) Wheeler and adding C. J. (Chris) Belis and B. R. (Bobby) Franco. This modification also adds the area code (575) to respective phone numbers.	B.6.d

Item 1

Description

This modification revises Permit Attachment E, Table E-1, *Inspection Schedule/Procedures*, to add procedure number "WP 12-ER3007" to the *Procedure Number and Inspection Criteria* column for the Mine Rescue Self-Contained Breathing Apparatus (SCBA) line item.

Basis

This change is classified as an "Administrative and informational changes" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42 Appendix I, A.1).

Discussion

This change adds the recently formalized procedure, WP 12-ER3007, *MRT Equipment Control Use and Inspection*, to the Mine Rescue Self-Contained Breathing Apparatus (SCBA) line item of Table E-1. This procedure was recently issued and is the applicable procedure for inspecting Mine Rescue Team SCBAs. This change is needed pursuant to the Permit Attachment E, Section E-1, Inspection Schedule, which indicates that the applicable inspection procedures are included in Table E-1, and ensures completeness of the inspection schedule. There is no change in frequency of the inspection for this piece of equipment.

Proposed Revised Permit Text:

**Table E-1
Inspection Schedule/Procedures**

Systems/Equipment Name	Responsible Organization	Inspection^a Frequency	Procedure Number and Inspection Criteria^h
Mine Rescue Self-Contained Breathing Apparatus (SCBA)	Mine Rescue Team	30 days	<u>WP 12-ER3007</u> Inspection for Deterioration ^b and Pressure ^g

Item 2

Description

This modification revises a reference in Permit Attachment C7, Section C7-1a, *Confirmation of a Representative Subpopulation of the Waste*, from *Permit Attachment C3, Section C3-13* to *Permit Attachment C3, Section C3-7*.

Basis

This change is classified as a "Correction of typographical errors," and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.2).

Discussion

This editorial change is needed to correctly reference Permit Attachment C3, Section C3-7, *Nonconformances*, which describes the nonconformance disposition process.

Proposed Revised Permit Text:

C7-1a Confirmation of a Representative Subpopulation of the Waste

For each container selected for confirmation in accordance with the process above, the Permittees will examine the respective nonconformance report (**NCR**) documentation to verify NCRs have been dispositioned for the selected container as required by Permit Attachment C3, Section C3-~~7~~**13**.

Item 3

Description

This modification updates the list of Resource Conservation and Recovery Act (RCRA) Emergency Coordinators in Permit Attachment D, *RCRA Contingency Plan*, Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators*, by removing J. B. (James) Wheeler and adding C. J. (Chris) Belis and B. R. (Bobby) Franco. This modification also adds the area code (575) to respective phone numbers.

Basis

The change is classified as "Changes in name, address, or phone number of coordinators or others persons or agencies identified in the plan" and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, B.6.d).

Discussion

This change is needed to update the list of RCRA Emergency Coordinators in the Permit. In order to maintain individual privacy information (i.e. home address and personnel phone numbers), these changes are being made to the copy maintained at the WIPP facility, and a "confidential" copy is being sent to the NMED. Area codes are needed to ensure that complete contact information is provided. The current version of the Permit posted on the Information Repository will NOT contain this private information.

Proposed Revised Permit Text:

**Table D-1
Resource Conservation and Recovery Act Emergency Coordinators¹**

Name	Address*	Office Phone	Personal Phone*
R. C. (Russ) Stroble		<u>(575) 234-8276</u> or <u>(575) 234-8554</u>	
J. E. (Joseph) Bealler		<u>(575) 234-8276</u> or <u>(575) 234-8916</u>	
M. G. (Mike) Proctor		<u>(575) 234-8276</u> or <u>(575) 234-8143</u>	
G. L. (Gary) Kessler		<u>(575) 234-8326</u>	
P. J. (Paul) Paneral		<u>(575) 234-8498</u>	
J. B. (James) Wheeler		234-8273	
M. L. (Mark) Long		<u>(575) 234-8170</u>	
A.C. (Andy) Cooper		<u>(575) 234-8197</u>	
<u>C. J. (Chris) Belis</u>		<u>(575) 628-5851</u>	
<u>B. R. (Bobby) Franco</u>		<u>(575) 234-8167</u>	

* NOTE: Personal information (home addresses and personal phone numbers) has been removed from informational copies of this Permit.

¹ For every shift, one qualified RCRA Emergency Coordinator serves as the primary, and a second qualified RCRA Emergency Coordinator is available to serve as the alternate.