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Department of Energy
Carlsbad Field Office
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SEP 21 2018

SEP 19 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: Completion of Implementation of the Approved Class 2 Permit Modification Request, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number NM48901139088-TSDF

Reference: New Mexico Environment Department correspondence from John E. Kieling, Chief, Hazardous Waste Bureau to Todd Shrader, CBFO, and Bruce C. Covert, NWP, dated April 19, 2018, subject: Approval of Request for 90-Day Extension of Time for Implementation of the Approved Class 2 Permit Modification Request, Waste Isolation Pilot Plant, EPA I.D. Number NM4890139088

Dear Mr. Kieling:

The purpose of this letter is to provide notification to the New Mexico Environment Department (NMED) that the Permittees have completed implementation of the approved two-item Class 2 Permit Modification Request (PMR), *Training Program Revisions and Changes Due to Construction and Operation of a New Filter Building*. Per the referenced approval from the NMED granting a 90-day extension of time for implementation, this effort was to be completed no later than July 22, 2018. All required implementation activities were completed by July 19, 2018.

On July 18, 2018, the Permittees completed the implementation of the changes to the training program resulting from NMED's approval of the Class 2 PMR, *Training Program Revisions*. This implementation effort involved the following:

- Procedure revisions to reflect changes to Permit Attachment F, *Facility Personnel Permit Training Program*
- Development of a new Management Policy, MP 1.61, *Job Change Analysis Process/ Hazardous Waste Facility Permit (HWFP) Training Compliance*, to define the process for evaluating, tracking documenting, and maintaining the training requirements as defined in Permit Attachment F
- Development of the WIPP facility file containing the elements of the training program required by 40 CFR §264.16(d), including:
 - Qualified Watch Lists (QWLs) containing the lists of employees, by name, holding Permit job positions;
 - MP 1.61, Attachment 2, *TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions*, listing the duties associated with each Permit job title;
 - Qualification Cards describing the requisite skill, minimum education requirements, and required qualifications for each Permit job title; and



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- Training course files containing the written training descriptions, including type and amount of both introductory and continuing training
- Development of two new training courses, HWO-101, Resource Conservation and Recovery Act (RCRA) Regulations/HWFP Overview, and HWP-101, HWFP Inspections/Recordkeeping, and administration of Permit-required training to the applicable facility personnel
- Verification of completed training via the QWLs for employees holding Permit job positions

Procedure revisions needed to implement the changes to Permit Attachment O, *Mine Ventilation Rate Monitoring Plan*, resulting from approval of the Class 2 PMR, *Changes Due to Construction and Operation of a New Filter Building*, were completed by July 19, 2018.

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

cc:

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*ED denotes electronic distribution