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

Subject: Inform the New Mexico Environment Department of Change in Priority Regarding Two Class 3 Permit Modification Requests


Dear Mr. Kieling:

The purpose of this letter is to inform you that the Permit Modification Requests (PMRs) listed below are no longer high priority PMRs.

- Addition of a Concrete Over pack Container Storage Unit (Reference 1)
- Modify Excluded Waste Prohibition (Reference 2 and 3)
These PMRs can be processed after completion of the processes associated with current high priority Permit related activities such as the Excavation of a New Shaft and Associated Drifts PMR and the Waste Isolation Pilot Plan Ten-Year Permit Renewal Application. Please disregard the previous request to resume processing the Excluded Waste Prohibition PMR (Reference 4).

If you have any questions, please contact Mr. Michael R. Brown at (575) 234-7476.

Sincerely,

Kirk D. Lachman, Manager
Carlsbad Field Office

Sean Dunagan, President and Project Manager
Nuclear Waste Partnership LLC

cc:
R. Maestas, NMED *ED
D. Biswell, NMED ED
M. McLean, NMED ED
CBFO M&RC
*ED denotes electronic distribution
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


Dear Mr. Kieling:

The purpose of this letter is to provide you with the Quick Reference Guide to the Waste Isolation Pilot Plan (WIPP) Facility Resource Conservation and Recovery Act (RCRA) Contingency Plan. This guide was developed in accordance with the requirements of New Mexico Administrative Code (NMAC) 20.4.1.300 (incorporating 40 Code of Federal Regulations (CFR) §262.262(b)).

The Quick Reference Guide to the WIPP Facility RCRA Contingency Plan will be maintained on file at the WIPP facility. Pursuant to NMAC 20.4.1.300 (incorporating 40 CFR § 262.262(a) and (b)), it is being made available to facility emergency response organizations described in Permit Attachment D, Section D-2a, Emergency Response Personnel, and the state and local agencies identified in Permit Attachment D, Section D-9, Location of the RCRA Contingency Plan. When the quick reference guide is revised, it will be redistributed.

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 question, please contact Mr. Michael R. Brown at (575) 234-7476.

Sincerely,

Kirk D. Lachman, Acting Manager
Carlsbad Field Office

Sean Dunagan, President and Project Manager
Nuclear Waste Partnership LLC

cc: w/enclosure
R. Maestas, NMED
D. Biswell, NMED
M. McLean, NMED
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*ED denotes electronic distribution
For emergency assistance at the WIPP facility, contact the WIPP Central Monitoring Room via the contact information listed below. A RCRA Emergency Coordinator is on-site at the WIPP facility 24 hours a day, seven days a week (40 CFR §262.262(b)(8)).

<table>
<thead>
<tr>
<th>WIPP Emergency Telephone Numbers</th>
<th>WIPP Non-Emergency Telephone Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>WIPP RCRA 575-234-8111</td>
<td>575-234-8125 (CMR)</td>
</tr>
<tr>
<td>Emergency Coordinator Cell Phone: 575-234-8457 (CMR)</td>
<td>575-234-8125 (CMR)</td>
</tr>
</tbody>
</table>

CMR = Central Monitoring Room

Directions to the Main Security/Entry Gate at the WIPP Facility

<table>
<thead>
<tr>
<th>Facility Address</th>
<th>From the North</th>
<th>From the South</th>
</tr>
</thead>
<tbody>
<tr>
<td>34 Louis Whitlock Road Carlsbad, NM 88220</td>
<td>From Carlsbad, NM travel east on US-180/US-62 for ~ 29 miles. Turn right (south) onto Louis Whitlock Road, Travel ~ 11.5 miles and arrive at the WIPP Facility on the left.</td>
<td>From Carlsbad, NM travel south on US-285 (~ 7.7 miles), turn left (east) on NM-31 (Potash Mines Road) and travel for ~ 7.5 miles. Turn right onto NM-128 (Jal Highway) and travel ~ 10.5 miles. Turn left (north) onto WIPP Road and travel ~ 3.8 miles. Turn left (north) onto Louis Whitlock Road, travel ~ 0.34 miles, and arrive at the WIPP Facility on the right.</td>
</tr>
</tbody>
</table>

Note: Both routes can accommodate a 53-foot trailer.

Figure 1 displays a 10-mile radial ring around the WIPP facility. Due to its remote location, the WIPP facility has a low population density. The nearest residents live at the J.C. Mills Ranch, approximately 3.5 miles from the center of the WIPP site. The area surrounding the WIPP facility is used primarily for grazing, potash mining, and mineral exploration. There are no hospitals or schools within a 10-mile radius around the WIPP facility (40 CFR §262.262(b)(5)).
Note: There are no schools or hospitals within a 10-mile radius of the remote WIPP facility location.

Table 1 presents the hazardous waste that may be present at the WIPP facility. The maximum onsite quantities for site-generated hazardous wastes were obtained from the hazardous waste streams accumulated in 2019 and the 2013, 2015, and 2017 WIPP Biennial Hazardous Waste Reports. Table 1 identifies the site-generated hazardous waste accumulation areas (satellite accumulation area (SAA) and central accumulation areas (CCAs)), and the permitted storage and disposal locations for TRU mixed wastes which correspond to the locations presented in Figure 2 below (40 CFR §262.262(b)(4)).
<table>
<thead>
<tr>
<th>Hazardous Waste Name</th>
<th>Hazard</th>
<th>Maximum Onsite (lbs)</th>
<th>Point of Generation and/or Location</th>
<th>Figure 2 Location Number</th>
<th>Unique/Special Treatment by Medical or Hospital Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spent Hilti Cartridges</td>
<td>Toxic</td>
<td>110 lbs</td>
<td>Maintenance Ops</td>
<td>#4 - SAA #25, U/G Tool Crib</td>
<td></td>
</tr>
<tr>
<td>Absorbed Neutralized Battery Acid Spill Clean Up Materials</td>
<td>Toxic</td>
<td>66 lbs</td>
<td>Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Gasoline or Diesel contaminated materials from fuel spill cleanup</td>
<td>Ignitable, Toxic</td>
<td>600 lbs (Mainly absorbent material and removed soil)</td>
<td>Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Expired Adhesive Compound</td>
<td>Ignitable, Toxic</td>
<td>36 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Expired Reagents and Solutions from Laboratory Operations</td>
<td>Corrosive, Toxic</td>
<td>25 lbs</td>
<td>Environmental Hydrogeology &amp; Monitoring Groundwater Monitoring Wells</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Damaged Lead Acid Batteries</td>
<td>Corrosive, Toxic</td>
<td>64 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Lead Acid Batteries Managed as Radioactively-contaminated hazardous waste</td>
<td>Corrosive, Toxic, Radioactive</td>
<td>5,055 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1a- Surface CAA (Building 246 MgO Shelter)</td>
<td>Radioactivity hazard requires special treatment by medical/hospital staff and radiological staff.</td>
</tr>
<tr>
<td>Discarded Diesel Fuel</td>
<td>Ignitable</td>
<td>775 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Diesel and Hydraulic Fluid Mixture</td>
<td>Ignitable</td>
<td>1,800 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Gasoline and Water Mixture</td>
<td>Ignitable, Toxic</td>
<td>5,271 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Discarded Methane,</td>
<td>Ignitable</td>
<td>67 lbs</td>
<td>Laboratory Ops</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
</tbody>
</table>
## Table 1. Hazardous Waste (40 CFR §262.262(b)(1), (2) & (3))

<table>
<thead>
<tr>
<th>Hazardous Waste Name</th>
<th>Hazard</th>
<th>Maximum Onsite (lbs)</th>
<th>Point of Generation and/or Location</th>
<th>Figure 2 Location Number</th>
<th>Unique/Special Treatment by Medical or Hospital Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxygen, and Propane Calibration Gas Cylinders</td>
<td>Toxic</td>
<td>42 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Broken Fluorescent Lamps</td>
<td>Toxic</td>
<td>27 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Lead and Cadmium Contaminated Debris</td>
<td>Toxic</td>
<td>271 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Expired Paint Thinner – Stripcoat Mix</td>
<td>Ignitable, Toxic</td>
<td>158 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Off-specification Paint Supplies</td>
<td>Ignitable, Toxic</td>
<td>24 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Expired and Spent Respirators with Ignitable Catalyst</td>
<td>Ignitable</td>
<td>158 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Expired Carboguard Epoxy</td>
<td>Ignitable</td>
<td>12 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Brine Wastewater</td>
<td>Toxic</td>
<td>39,500 lbs</td>
<td>Mine Maintenance Ops</td>
<td>#1b- Surface Sump Water CAA (Building 474W)</td>
<td></td>
</tr>
<tr>
<td>Expired Ethyl and Isopropyl Alcohol</td>
<td>Ignitable</td>
<td>182 lbs</td>
<td>Maintenance Ops Sitewide</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Radioactive Waste HEPA Filters and PPE</td>
<td>Toxic, Radioactive</td>
<td>14,404 lbs</td>
<td>Maintenance Ops for Filter Change Out</td>
<td>#1a- MgO Shed Mixed Waste Storage Area</td>
<td>Radioactivity hazard requires special treatment by medical/hospital staff and radiological staff.</td>
</tr>
<tr>
<td>Floor Finish Stripper</td>
<td>Corrosive</td>
<td>76 lbs</td>
<td>Maintenance Ops Sitewide Spill Clean Up</td>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td></td>
</tr>
<tr>
<td>Building 411 Waste Handling Building</td>
<td>Toxic, Radioactive</td>
<td>194.1 cubic meters</td>
<td>Being processed for waste emplacement</td>
<td>#2- B411 Waste Handling Building Container Storage Unit</td>
<td>Radioactivity hazard requires special treatment</td>
</tr>
</tbody>
</table>
### Table 1. Hazardous Waste (40 CFR §262.262(b)(1), (2) & (3))

<table>
<thead>
<tr>
<th>Hazardous Waste Name</th>
<th>Hazard</th>
<th>Maximum Onsite (lbs)</th>
<th>Point of Generation and/or Location</th>
<th>Unique/Special Treatment by Medical or Hospital Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Container Storage Unit</td>
<td></td>
<td></td>
<td></td>
<td>by medical/hospital staff and radiological staff.</td>
</tr>
<tr>
<td>Building 411 Parking Area Container Storage Unit</td>
<td>Toxic, Radioactive</td>
<td>251 cubic meters (includes CH &amp; RH and surge storage)</td>
<td>Temporary storage prior to being moved into B411 WHB Container Storage Unit</td>
<td>Radioactivity hazard requires special treatment by medical/hospital staff and radiological staff.</td>
</tr>
</tbody>
</table>

The on-site notification systems (fire alarms, smoke detectors) associated with the hazardous waste accumulation/storage/disposal locations identified in Figure 2 are presented in Table 2. Since the WIPP facility has an on-site Fire Department, the fire alarms ring on-site. There are no fire alarms that notify off-site personnel. The Central Monitoring System (CMS) monitors specific equipment functions and conditions in the underground and on the surface. This includes numerous heat sensing fire detectors, smoke detectors, sprinkler system water flow alarm devices, manual fire alarm systems, control panels, and audible/visual warning devices.

### Table 2. On-Site Notification Systems (40 CFR §262.262(b)(7))

<table>
<thead>
<tr>
<th>Figure 2 Location Number</th>
<th>Area Fire Detection/Alarms and Fire Suppression</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1- Surface CAA (Buildings 474A and 474B)</td>
<td>This central accumulation area is equipped with a wet-pipe sprinkler system. Equipped with both automatic fire detection and manual fire alarm pull stations and smoke detectors. Deploys bells and strobe lights. Monitored by the CMS. There are two mounted portable fire extinguishers located in this area.</td>
</tr>
<tr>
<td>#1a- Surface CAA (Building 246 MgO Shelter)</td>
<td>This central accumulation area is equipped with a portable fire extinguisher.</td>
</tr>
<tr>
<td>#1b- Surface Sump Water CAA (Building 474W)</td>
<td>This central accumulation area is equipped with a portable fire extinguisher.</td>
</tr>
<tr>
<td>#2- B411 Waste Handling Building Container Storage Unit (Building 411 Interior)</td>
<td>Numerous heat sensing fire detectors, smoke detectors, sprinkler system water flow alarm devices, manual fire alarm systems, control panels, and audible/visual warning devices in the WHB which are monitored by the CMS. The WHB is equipped with wet-pipe sprinkler systems. Numerous mounted portable fire extinguishers located throughout B411.</td>
</tr>
<tr>
<td>#3- B411 Parking Area Container Storage Unit (Building 411 Exterior)</td>
<td>No automatic fire detection or manual fire alarm pull stations within this unit. No smoke alarms deployed. There are several portable fire extinguishers staged nearby. Waste transport equipment in this area carries portable fire extinguishers.</td>
</tr>
<tr>
<td>#4- SAA #25, U/G Tool Crib</td>
<td>Numerous heat sensing fire detectors, smoke detectors, sprinkler system water flow alarm devices, manual fire alarm systems, control panels, and audible/visual warning devices in the underground which are monitored by the CMS. The SAA #25 is also equipped with a mounted fire extinguisher.</td>
</tr>
</tbody>
</table>
Table 2. On-Site Notification Systems (40 CFR §262.262(b)(7))

<table>
<thead>
<tr>
<th>Figure 2 Location Number</th>
<th>Area Fire Detection/Alarms and Fire Suppression</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notes:</td>
<td></td>
</tr>
</tbody>
</table>
1. A radio fire alarm reporter system provides fire alarm and system trouble annunciations in the Central Monitoring Room for structures not connected to the CMS local processing units. This system consists of radio transmitters that transmit alarm and trouble signals via radio to a central base stations/receiver. |
2. Continuous Air Monitors (CAMs) are deployed throughout radioactive waste management areas for notification of elevated airborne radioactivity levels. Temporary or portable CAMs provide a local alarm (both audible and visual). Networked CAMs provide an alarm in the Central Monitoring Room. |

Primary and alternate assembly areas (for building evacuations) and staging areas (for site evacuation) are presented in Figure 3 (40 CFR §262.262(b)(5)).

The primary evacuation routes for WIPP facility employees are the same as the main access roads to the WIPP facility. Alternate evacuation routes from the facility are provided at the south side and the east side of the facility as shown below in Figure 4 (40 CFR §262.262(b)(5)). The preferred evacuation route is determined during evacuation planning and is based on the nature of the event, prevailing weather conditions, and actual or potential radiological release.

The locations of the WIPP facility fire hydrants along with their flow rates are presented in Figure 5 (40 CFR §262.262(b)(6)). The fire hydrants are highlighted in yellow to assist in locating them on the map. The WIPP facility has two 180,000 gallon water supply tanks which are also identified on Figure 5.

Figure 6 presents the underground entrance and exit routes, along with a depiction of the Hazardous Waste Disposal Units (Panels 1-8), and the location of SAA #25. The Waste Shaft hoist and the Salt Handling Shaft hoist are the primary personnel entry hoists to the underground. The Waste Shaft hoist is the primary emergency egress conveyance. When the decision has been made to evacuate the underground, workers are directed to escape routes based on impact from hazard (e.g., fire) location, visibility, and pathway obstructions. During an evacuation, the primary evacuation routes are the preferred evacuation routes to take if conditions permit. If the primary evacuation routes are compromised, it is acceptable to take the secondary or alternate escape route and return to the primary route once clear of the obstruction or hazard. In the event of loss of electrical power, the Air Intake Shaft hoist motor can be electrically powered by the WIPP facility backup diesel generators.
Figure 2. WIPP Facility Hazardous Waste Accumulation and Storage (TRU Mixed) Areas
Figure 3: Site Assembly and Staging Areas

Figure 4. WIPP Facility Evacuation Routes
Figure 5. WIPP Fire Hydrant Locations & Flow Rates

Fire Hydrant Flow Rate in Gallons Per Minute

FH-01 GPM: 2005
FH-02 GPM: 2084
FH-03 GPM: 2032
FH-04 GPM: 1945
FH-05 GPM: 1919
FH-06 GPM: 1476
FH-07 GPM: 1260
FH-08 GPM: 2003
FH-09 GPM: 1361
FH-10 GPM: 2057
FH-11 GPM: 2032
FH-12 GPM: 2005
FH-13 GPM: 2005
FH-14 GPM: 2005
FH-15 GPM: 2005
FH-16 GPM: 2005
FH-17 GPM: 1950
FH-18 GPM: 1950
FH-19 GPM: 1977
FH-20 GPM: 1977
FH-21 GPM: 1893
FH-22 GPM: 1548
FH-23 GPM: 2032
Underground Entrance/Exit Routes are:
1. Waste Shaft
2. Air Intake Shaft
3. Salt Handling Shaft

Hazardous Waste Disposal Units are Panels 1–8.

Figure 6. WIPP Underground Entrances/Exits and Location of HWDUs & SAA #25
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


Dear Mr. Kieling:

The purpose of this letter is to provide you written notification that the Permittees terminated the August 20, 2019, implementation of the Resource Conservation and Recovery Act (RCRA) Contingency Plan identified in the referenced letter dated August 30, 2019.

The referenced Report of Implementation identified that the Waste Isolation Pilot Plant facility RCRA Contingency Plan was implemented on August 20, 2019, as a precautionary measure while the condition of a standard waste box (SWB) was evaluated in the Contact-Handled Bay of the Waste Handling Building Container Storage Unit. A Response Plan was developed to evaluate potential pressurization of a SWB (PADTEMP9A) from the Savannah River Site. Evaluation activities were completed on September 5, 2019, and concluded the SWB was not pressurized and to be of sound structural integrity. Subsequently, on the same day (September 5, 2019), the Permittees terminated the implementation of the RCRA Contingency Plan. Emplacement of the SWB into Room 3 of Panel 7 occurred on September 5, 2019.

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 regarding this notification, please call Mr. Michael R. Brown at (575) 234-7476.

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