



**Department of Energy**  
Carlsbad Field Office  
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May 19, 2021

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

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

Dear Mr. Pierard:

Enclosed are the Class 1 Permit Modification Notifications for the following items:

- Reassign Emergency Response Team Duties to the Waste Isolation Pilot Plant (WIPP) Fire Department
- Streamline and Add the Annual Inspection of the Surface Remote-Handled (RH) Transuranic (TRU) Mixed Waste Handling Area to Attachment E, Table E-1a
- Revise Procedure Number in Attachment L, Table L-6
- Update Property Protection Area Fence Line to Incorporate Temporary Fence Changes and Update WIPP Emergency Evacuation Figures and Text
- Revise List of 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) 706-0072.

Sincerely,


 Digitally signed by  
 Reinhard M. Knerr  
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 Manager  
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Enclosure

cc: w/enclosure  
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**Class 1 Permit Modification Notifications**

**Reassign Emergency Response Team Duties to the WIPP Fire Department**

**Streamline and Add the Annual Inspection of the Surface RH TRU Mixed Waste Handling Area to Attachment E, Table E-1a**

**Revise Procedure Number in Attachment L, Table L-6**

**Update Property Protection Area Fence Line to Incorporate Temporary Fence Changes and Update WIPP Emergency Evacuation Figures and Text**

**Revise List of Resource Conservation and Recovery Act Emergency Coordinators**

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

**WIPP Permit Number - NM4890139088-TSDF**

**May 2021**

## Table of Contents

Transmittal Letter	
Table of Contents.....	1
Acronyms, Abbreviations, and Units .....	2
Overview of the Permit Modification Notifications .....	3
Attachment A Description of the Class 1 Permit Modification Notifications .....	A-1
Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications .....	A-2
Item 1 .....	A-7
Description .....	A-7
Basis .....	A-7
Discussion.....	A-7
Proposed Revised Permit Text: .....	A-9
Item 2 .....	A-11
Description .....	A-11
Basis .....	A-11
Discussion.....	A-11
Proposed Revised Permit Text: .....	A-13
Item 3 .....	A-16
Description .....	A-16
Basis .....	A-16
Discussion.....	A-16
Proposed Revised Permit Text: .....	A-16
Item 4 .....	A-18
Description .....	A-18
Basis .....	A-19
Discussion.....	A-19
Proposed Revised Permit Text: .....	A-21
Item 5 .....	A-47
Description .....	A-47
Basis .....	A-47
Discussion.....	A-47
Proposed Revised Permit Text: .....	A-48

## Acronyms, Abbreviations, and Units

AIS	Air Intake Shaft
CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
ERT	Emergency Response Team
FD	Fire Department
HWDU	Hazardous Waste Disposal Unit
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PMN	Permit Modification Notification
PPA	Property Protection Area
RCRA	Resource Conservation and Recovery Act
RH	remote-handled
SOP	standard operating procedure
TRU	transuranic
WIPP	Waste Isolation Pilot Plant

## Overview of the Permit Modification Notifications

This document contains five 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 this PMN. The proposed modifications to the text of the Permit have 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	<p>Attachment D, Section D-2a, <i>Emergency Response Personnel</i></p> <p>Attachment D, Section D-2b, <i>Emergency Response Training</i></p> <p>Attachment D, Section D-4a(1), <i>Initial Emergency Response and Alerting the RCRA Emergency Coordinator</i></p> <p>Attachment D, Section D-8c, <i>Plan for Surface Evacuation</i></p>	<p>This modification revises Permit Attachment D, <i>RCRA Contingency Plan</i>, to reassign the job duties of the Emergency Response Team (ERT) to the WIPP Fire Department (FD). Permit Attachment D, Section D-2a, <i>Emergency Response Personnel</i>, Section D-2b, <i>Emergency Response Training</i>, Section D-4a(1), <i>Initial Emergency Response and Alerting the RCRA Emergency Coordinator</i>, and Section D-8c, <i>Plan for Surface Evacuation</i>, were revised. This modification also revises Permit Attachment D, Section D-4a(1), <i>Initial Emergency Response and Alerting the RCRA Emergency Coordinator</i>, to incorporate DOE Order 151.1D.</p> <p>Permit Attachment D was modified as described below:</p> <ul style="list-style-type: none"> <li>• Section D-2a, <i>Emergency Response Personnel</i> <ul style="list-style-type: none"> <li>○ Added “The WIPP Fire Department personnel serve as an Industrial Fire Brigade and are trained to respond to surface and underground emergencies on site, including fires, medical emergencies, and releases of hazardous materials.”</li> <li>○ Removed the bulleted paragraph for the Emergency Response Team</li> </ul> </li> <li>• Section D-2b, <i>Emergency Response Training</i> <ul style="list-style-type: none"> <li>○ Removed “and ERT members”</li> </ul> </li> <li>• Section D-4a(1), <i>Initial Emergency Response and Alerting the RCRA Emergency Coordinator</i> <ul style="list-style-type: none"> <li>○ Removed “the ERT,”</li> <li>○ Replaced DOE Order “151.1C” with “151.1D”</li> </ul> </li> <li>• Section D-8c, <i>Plan for Surface Evacuation</i> <ul style="list-style-type: none"> <li>○ Removed the second paragraph beginning with “If the ERT members have been....”</li> </ul> </li> </ul>	A.1
2	<p>Attachment E, Section E-1a(2), <i>Frequency of Inspections</i></p> <p>Attachment E, Table E-1a, <i>RH TRU Mixed Waste Inspection Schedule/Procedures</i></p>	<p>This modification consolidates redundant line items pertaining to floor integrity inspections in Permit Attachment E, Table E-1a, <i>RH TRU Mixed Waste Inspection Schedule/Procedures</i>. These inspections are now included and addressed in the <i>Surface RH TRU Mixed Waste Handling Area</i> inspection and respective inspection criteria. This modification also updates Permit Attachment E, Section E-</p>	A.1

Item No.	Affected Permit Section	Change Description	Category
		<p>1a(2), <i>Frequency of Inspections</i>, and Table E-1a, <i>RH TRU Mixed Waste Inspection Schedule/Procedures</i>, to add the annual Surface remote-handled (<b>RH</b>) TRU Mixed Waste Handling Area inspection required by current Permit Attachment E, Section E-1a(2). The respective inspection criteria were also added to Table E-1a.</p> <p>Attachment E was modified as specified below:</p> <ul style="list-style-type: none"> <li>• Section E-1a(2), <i>Frequency of Inspections</i> <ul style="list-style-type: none"> <li>○ Added “, as identified in Table E-1a.”</li> </ul> </li> <li>• Table E-1a, <i>RH TRU Mixed Waste Inspection Schedule/Procedures</i> <ul style="list-style-type: none"> <li>○ Removed <i>Cask Unloading Room</i> line item row</li> <li>○ Removed <i>Hot Cell</i> line item row</li> <li>○ Removed <i>Transfer Cell</i> line item row</li> <li>○ Removed <i>Facility Cask Loading Room</i> line item row</li> <li>○ Removed <i>RH Bay</i> line item row</li> <li>○ Added notes “c,d,e,f,g,h,” and “/ annually” to <i>Inspection Frequency</i> column of <i>Surface RH TRU Mixed Waste Handling Area</i></li> <li>○ Added a comma after “Communications” and “Container Conditions, and Floor Coating Integrity.” to <i>Inspection Criteria</i> column of <i>Surface RH TRU Mixed Waste Handling Area</i></li> </ul> </li> </ul> <p>No Permit conditions or inspections are being removed or revised by eliminating these line items.</p>	
3	Attachment L, Table L-6 <i>Analytical Parameter and Sample Requirements</i>	<p>This modification revises and clarifies the first note in Permit Attachment L, Table L-6, <i>Analytical Parameter and Sample Requirements</i>. WIPP standard operating procedure (<b>SOP</b>), “WP 02-EM1006” was changed to “WP 02-EM1010”. The note was clarified by changing “data are...” to “information in this table is from SOP WP 02-EM1010 and is provided as information only” This modification also corrects typographical errors in columns 16 and 17 by deleting the “?” in column 16 row 1 and the “4” in column 17 row 2.</p>	A.1  A.2
4	Part 2, Section 2.6.2., <i>Barrier</i> Part 2, Section 2.6.4., <i>Warning Signs</i> Attachment A, A-3, <i>Property Description</i> Attachment D, <i>List of Figures</i>	<p>This modification updates Permit figures to reflect a temporary change to the northwest section of the Property Protection fence line, aligns the Property Protection Area (<b>PPA</b>) security barrier with the RCRA regulations to</p>	A.1



Item No.	Affected Permit Section	Change Description	Category
	<p>Attachment D, D-8a, <i>Surface Evacuation On-site and Off-site Staging Areas</i></p> <p>Attachment D, D-8e, <i>Further Site Evacuation</i></p> <p>Attachment A4, Figure A4-2, <i>WIPP Traffic Flow Diagram</i></p> <p>Attachment A4, Figure A4-2-NFB, <i>WIPP Traffic Flow Diagram with Building 416</i></p> <p>Attachment D, Figure D-1, <i>WIPP Surface Structures</i></p> <p>Attachment D, Figure D-1a, <i>Legend to Figure D-1</i></p> <p>Attachment D, Figure D-1-NFB, <i>WIPP Surface Structures with Building 416</i></p> <p>Attachment D, Figure D-1a-NFB, <i>Legend to Figure D-1-NFB (Building 416)</i></p> <p>Attachment D, Figure D-5, <i>Fire-Water Distribution System</i></p> <p>Attachment D, Figure D-5-NFB, <i>Fire-Water Distribution with Building 416</i></p> <p>Attachment D, Figure D-6, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas</i></p> <p>Attachment D, Figure D-6-NFB, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416</i></p> <p>Attachment D, Figure D-8, <i>WIPP Site Evacuation Routes</i></p>	<p>allow for use of material other than chain link fencing, and incorporates an additional figure from an implementing document in the current <i>WIPP Emergency Management Plan</i>, which depicts off site evacuation routes. This modification also updates the Permit figures to reflect a change in a building location, the removal of a building, and add labels to an existing building.</p> <p>This modification updates the following Permit figures to reflect a temporary change to the northwest section of the PPA fence line:</p> <ul style="list-style-type: none"> <li>• Attachment A4, Figure A4-2, <i>WIPP Traffic Flow Diagram</i></li> <li>• Attachment D, Figure D-1, <i>WIPP Surface Structures</i></li> <li>• Attachment D, Figure D-5, <i>Fire-Water Distribution System</i></li> <li>• Attachment D, Figure D-6, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas</i></li> </ul> <p>This modification updates Permit Part 2, Section 2.6.2., <i>Barrier</i>, Permit Part 2, Section 2.6.4. <i>Warning Signs</i>, and Permit Attachment A, Section A-3, <i>Property Description</i> to align the PPA security barrier with the RCRA regulations to allow for use of material other than chain link fencing.</p> <p>This modification modifies Permit Attachment D to reflect the current documents in the <i>WIPP Emergency Management Plan</i> and clarifies evacuation routes at the facility in the following ways:</p> <ul style="list-style-type: none"> <li>• Replace Figure D-8 with updated figure incorporating north direction arrow</li> <li>• Changes Figure D-8 <i>WIPP Site Evacuation Routes</i> title to <i>WIPP Site Evacuation Map</i></li> <li>• Adds Figure D-8a, <i>WIPP Site Evacuation Routes</i> to reflect and incorporate recent changes to implementing documents of the <i>WIPP Emergency Management Plan</i></li> <li>• Updates the Permit text in Sections D-8a, <i>Surface Evacuation On-site and Off-site Staging Areas</i> and D-8e, <i>Further Site Evacuation</i>, to clarify emergency event evacuation and figure references</li> <li>• Adds Figure D-8a <i>WIPP Site Evacuation Routes</i> to the List of Figures</li> </ul>	

Item No.	Affected Permit Section	Change Description	Category
		<p>This modification removes Building 918 and updates the location of Building 918A in the following figures:</p> <ul style="list-style-type: none"> <li>• Attachment A4, Figure A4-2, <i>WIPP Traffic Flow Diagram</i></li> <li>• Attachment A4, Figure A4-2-NFB, <i>WIPP Traffic Flow Diagram with Building 416</i></li> <li>• Attachment D, Figure D-1, <i>WIPP Surface Structures</i></li> <li>• Attachment D, Figure D-1a, <i>Legend to Figure D-1</i></li> <li>• Attachment D, Figure D-1-NFB, <i>WIPP Surface Structures with Building 416</i></li> <li>• Attachment D, Figure D-1a-NFB, <i>Legend to Figure D-1-NFB (Building 416)</i></li> <li>• Attachment D, Figure D-5, <i>Fire-Water Distribution System</i></li> <li>• Attachment D, Figure D-5-NFB, <i>Fire-Water Distribution with Building 416</i></li> <li>• Attachment D, Figure D-6, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas</i></li> <li>• Attachment D, Figure D-6-NFB, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416</i></li> </ul> <p>This modification incorporates a label for Building 413B in the following figures:</p> <ul style="list-style-type: none"> <li>• Attachment D, Figure D-1, <i>WIPP Surface Structures</i></li> <li>• Attachment D, Figure D-1-NFB, <i>WIPP Surface Structures with Building 416</i></li> <li>• Attachment D, Figure D-1a-NFB, <i>Legend to Figure D-1-NFB (Building 416)</i></li> <li>• Attachment D, Figure D-5, <i>Fire-Water Distribution System</i></li> <li>• Attachment D, Figure D-5-NFB, <i>Fire-Water Distribution with Building 416</i></li> <li>• Attachment D, Figure D-6, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas</i></li> <li>• Attachment D, Figure D-6-NFB, <i>WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416</i></li> </ul> <p>This modification incorporates a label for Building 413B in the following figures:</p> <ul style="list-style-type: none"> <li>• Attachment D, Figure D-1, <i>WIPP Surface Structures</i></li> </ul>	

Item No.	Affected Permit Section	Change Description	Category
		<ul style="list-style-type: none"> <li>• Attachment D, Figure D-1-NFB, <i>WIPP Surface Structures with Building 416</i></li> </ul>	
5	Attachment D, Table D-1, <i>Resource Conservation and Recovery Act Emergency Coordinators</i>	<p>This modification revises Permit Attachment D, Table D-1, <i>Resource Conservation and Recovery Act Emergency Coordinators</i>, with the following changes:</p> <ul style="list-style-type: none"> <li>• Adds "J.R. (James) Bailey"</li> <li>• Adds "M.L. (Martin) Mendes"</li> <li>• Adds "D.J. (Derek) Tweedy"</li> </ul>	B.6.d

## Item 1

### Description

This modification revises Permit Attachment D, *RCRA Contingency Plan*, to reassign the job duties of the Emergency Response Team (**ERT**) to the WIPP Fire Department (**FD**). Permit Attachment D, Section D-2a, *Emergency Response Personnel*, Section D-2b, *Emergency Response Training*, Section D-4a(1), *Initial Emergency Response and Alerting the RCRA Emergency Coordinator*, and Section D-8c, *Plan for Surface Evacuation*, were revised. This modification also revises Permit Attachment D, Section D-4a(1), *Initial Emergency Response and Alerting the RCRA Emergency Coordinator*, to incorporate DOE Order 151.1D.

Permit Attachment D was modified as described below:

- Section D-2a, *Emergency Response Personnel*
  - Added “The WIPP Fire Department personnel serve as an Industrial Fire Brigade and are trained to respond to surface and underground emergencies on site, including fires, medical emergencies, and releases of hazardous materials.”
  - Removed the bulleted paragraph for the Emergency Response Team
- Section D-2b, *Emergency Response Training*
  - Removed “and ERT members”
- Section D-4a(1), *Initial Emergency Response and Alerting the RCRA Emergency Coordinator*
  - Removed “the ERT,”
  - Replaced DOE Order “151.1C” with “151.1D”
- Section D-8c, *Plan for Surface Evacuation*
  - Removed the second paragraph beginning with “If the ERT members have been....”

### Basis

The change is classified under “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 updates Permit Attachment D to reassign the job duties of the ERT to the WIPP FD. Only organizational changes are being made and no changes are being made in emergency procedures in Permit Attachment D (i.e., spill or response procedures). The Permittees conducted an internal baseline emergency management needs assessment that determined the increased WIPP FD staffing levels of qualified firefighters is adequate to cover emergency response events that could potentially occur at the WIPP facility. As a result, the

ERT, which has historically been comprised of volunteer personnel, is no longer needed to supplement the WIPP FD response capabilities as currently stated in Permit Attachment D. The administrative replacement of the ERT with qualified firefighters enhances the Permittees' emergency response capabilities because the WIPP FD is comprised of full time (non-volunteer) firefighters that are trained in emergency response pursuant to the Permit. This change is needed to update the information in Permit Attachment D to ensure consistency with the emergency management needs assessment. This change also revises Permit Attachment D, Section D-4a(1) to reflect a change from DOE Order 151.1C to DOE Order 151.1D.

## Proposed Revised Permit Text:

### D-2a Emergency Response Personnel

- WIPP Fire Department—The primary providers of fire suppression, technical rescue, Emergency Medical Services (EMS), and hazardous materials response for the protection of personnel in both surface and underground facilities. The WIPP Fire Department personnel serve as an Industrial Fire Brigade and are trained to respond to surface and underground emergencies on site, including fires, medical emergencies, and releases of hazardous materials.
- Emergency Response Team (ERT)— ~~WIPP facility personnel who serve as an Industrial Fire Brigade and are trained to respond to surface and underground emergencies on site, including fires, medical emergencies, and releases of hazardous materials. The ERT members supplement WIPP Fire Department response capabilities. The ERT member assigned to the underground will not perform any coordinated firefighting underground and will only respond to incipient-stage fires that threaten TRU mixed waste, if it is safe to do so.~~

### D-2b Emergency Response Training

The WIPP Fire Department personnel are trained in accordance with the *WIPP Fire Department Training Plan*, which is kept on file at the WIPP facility. The training plan incorporates current National Fire Protection Association (**NFPA**) standards for training Firefighters and ERT members.

### D-4a(1) Initial Emergency Response and Alerting the RCRA Emergency Coordinator

Once the CMRO is notified of a fire, explosion, or a release anywhere in the facility (either by eyewitness notification or an alarm), the RCRA Emergency Coordinator is immediately notified. The RCRA Emergency Coordinator ensures that the emergency responders, including the WIPP Fire Department, ~~the ERT~~, and the MRT, have been notified, as needed. Once incident command has been established, the RCRA Emergency Coordinator has the authority to delegate the responsibilities for mitigation of the incident to the Incident Commander.

The response to an unplanned event will be performed in accordance with standard operating procedures and guides based on the applicable Federal, State, or local regulations and/or guidelines for that response. These include DOE Order 151.1 DC, *Comprehensive Emergency Management System*; the U.S. Mine Safety and Health Administration (**MSHA**); NMAC; Comprehensive Environmental Response, Compensation, and Liability Act; Chapter 74, Article 4B, New Mexico Statutes Annotated 1978; and the New Mexico Emergency Management Act.

D-8c Plan for Surface Evacuation

If the ERT members have been notified to respond to an identified area, these members will not depart the site during an evacuation, but will report to the Incident Commander for instructions and accountability. The ERT members will not evacuate until released by the Incident Commander.

## Item 2

### Description

This modification consolidates redundant line items pertaining to floor integrity inspections in Permit Attachment E, Table E-1a, *RH TRU Mixed Waste Inspection Schedule/Procedures*. These inspections are now included and addressed in the *Surface RH TRU Mixed Waste Handling Area* inspection and respective inspection criteria. This modification also updates Permit Attachment E, Section E-1a(2), *Frequency of Inspections*, and Table E-1a, *RH TRU Mixed Waste Inspection Schedule/Procedures*, to add the annual Surface remote-handled (RH) TRU Mixed Waste Handling Area inspection required by current Permit Attachment E, Section E-1a(2). The respective inspection criteria were also added to Table E-1a.

Attachment E was modified as specified below:

- Section E-1a(2), *Frequency of Inspections*
  - Added “, as identified in Table E-1a.”
- Table E-1a, *RH TRU Mixed Waste Inspection Schedule/Procedures*
  - Removed *Cask Unloading Room* line item row
  - Removed *Hot Cell* line item row
  - Removed *Transfer Cell* line item row
  - Removed *Facility Cask Loading Room* line item row
  - Removed *RH Bay* line item row
  - Added notes “c,d,e,f,g,h,” and “/ annually” to *Inspection Frequency* column of *Surface RH TRU Mixed Waste Handling Area*
  - Added a comma after “Communications” and added “Container Conditions, and Floor Coating Integrity.” to *Inspection Criteria* column of *Surface RH TRU Mixed Waste Handling Area*

No Permit conditions or inspections are being removed or revised by eliminating these line items.

### Basis

The change is classified under “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 is needed to remove redundancies and streamlines Permit Attachment E, Table E-1a, *RH TRU Mixed Waste Inspection Schedule/Procedures*. The line items removed from Table E-1a are all part of the RH Complex of the Waste Handling Building, the area where RH TRU



Mixed Waste is handled, as stated in the Permit. The inspections required by these line items were performed using the same procedure as that in the Surface RH TRU Mixed Waste Handling Area line item. The respective inspection criteria from the redundant line items were consolidated into the *Surface RH TRU Mixed Waste Handling Area* line item to preserve related inspection criteria. This change aligns Table E-1a more closely with the proposed changes in the 2020 Permit renewal application and streamlines Table E-1a.

Additionally, this approach is similar to the approach utilized in Table E-1 which does not individually break out separate areas of the Surface CH TRU Mixed Waste Handling Area inspections. No Permit conditions or inspections are being removed or revised by eliminating these line items.

This change is also needed to add the annual inspection of the *Surface RH TRU Mixed Waste Handling Area* in order to make Permit Attachment E, Table E-1a, *RH TRU Mixed Waste Inspection Schedule/Procedures*, consistent with the Permit text in Attachment E, Section E-1a(2), *Frequency of Inspections*, which requires the annual area inspection. The added reference to Table E-1a in the Permit text links the discussed inspection to the subsequent inspection criteria in Table E-1a. The addition of “/ annually” to the *Inspection Frequency* column of the *Surface RH TRU Mixed Waste Handling Area* line item further clarifies the annual inspection is required and aligns Table E-1a with the Permit text in Attachment E, Section E-1a(2), *Frequency of Inspections*. The addition of “..., Container Conditions, and Floor Coating Integrity” to the *Inspection Criteria* column of the *Surface RH TRU Mixed Waste Handling Area* line item in Table E-1a clarifies what is to be inspected. Adding this annual inspection to Table E-1a and the respective inspection criteria aligns the inspection schedule of Permit Attachment E with the WIPP procedure pertaining to this inspection. Furthermore, these changes ensure the completeness and accuracy of Permit Attachment E.

**Proposed Revised Permit Text:**

E-1a(2) Frequency of Inspections

When RH TRU mixed waste is present in the RH Complex, inspections are conducted visually and/or using closed-circuit video cameras in order to manage worker dose and to minimize occupational radiation exposures to as low as reasonably achievable (**ALARA**). More extensive inspections of these areas are performed at least annually during routine maintenance periods and when RH TRU mixed waste is not present. as identified in Table E-1a.

**Table E-1a  
RH TRU Mixed Waste Inspection Schedule/Procedures**

System/ Equipment Name	Responsible Organization <sup>J</sup>	Inspection <sup>a</sup> Frequency	Procedure Number (Latest Revision) <sup>I</sup>	Inspection Criteria		
				Deterioration <sup>b</sup>	Leaks/ spills	Other
Cask Unloading Room	Waste Operations	Preoperational <sup>e,d,e,f,h,i</sup>	WP05-WH1744	Yes	NA	Floor integrity
Hot Cell	Waste Operations	Preoperational <sup>e,d,e,f,g,h,i</sup>	WP05-WH1744	Yes	NA	Floor integrity
Hot Cell Overhead Powered Manipulator	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP05-WH1743 PM041215 (Annual) PM041216 (Annual) IC411037 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration
Hot Cell Bridge Crane	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP05-WH1742 PM041217 (Annual) PM041209 (Annual) IC411038 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.
Transfer Cell	Waste Operations	Preoperational <sup>e,d,e,f,h,i</sup>	WP05-WH1744	Yes	NA	Floor integrity
Facility Cask Loading Room	Waste Operations	Preoperational <sup>e,d,e,f,h,i</sup>	WP05-WH1744	Yes	NA	Floor integrity
Closed Circuit Television Camera	Waste Operations	Preoperational <sup>c,i</sup>	WP05-WH1757	NA	NA	Operability
Radiation Monitoring Equipment	Radiation Control	Preoperational <sup>c,d,e</sup>	WP12-HP1245 IC240010 WP12-HP1307 IC534000 WP12-HP1314 (Annual)	Yes	NA	Operability Checks, Functional Checks, Instrument calibrations, Flow Calibration, Efficiency Checks.
Cask Unloading Room Crane	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP05-WH1719 PM041190 (Quarterly) PM041191 (Annual) PM041192 (Annual) IC411035 (Annual)	Yes	Yes	Pre-operational Checks and Operating Instructions. Mechanical Inspection for Wear and Lubrication. Electrical Inspection. Load Cell Calibration.

System/ Equipment Name	Responsible Organization <sup>J</sup>	Inspection <sup>a</sup> Frequency	Procedure Number (Latest Revision) <sup>I</sup>	Inspection Criteria		
				Deterioration <sup>b</sup>	Leaks/ spills	Other
Horizontal Emplacement and Retrieval Equipment or functionally equivalent equipment	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP05-WH1700 PM052010 (Semi-Annual) <sup>k</sup> PM052011 (Annual) PM052013 PM052012 PM052014 (Annual)	Yes	Yes	Assembly and Operating Instructions. Electrical Inspection. Position Transducer Calibration. Tilt Sensor Calibration.
41-Ton Forklift	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP05-WH1602 PM074061 PM052003 (Hours of Use) PM074027 (Quarterly) PM074029 & PM074051 (Annual)	Yes	Yes	Pre-Operational Checks. PM performed every 100 hours of operation, every 500 hours of operation or every 5 Years. Quarterly Engine Emission Test. Annual Electrical Inspection. Annual NDE.
RH Bay	Waste Operations	Preoperational <sup>e,d,e,h,i</sup>	WP05-WH1744	Yes	NA	Floor integrity
Surface RH TRU Mixed Waste Handling Area	Waste Operations	Preoperational <sup>c,d,e,f,g,h,i</sup> / <u>annually</u>	WP- 05 WH1744	Yes	Yes	Posted Warning, Communications <u>Container Conditions, and</u> <u>Floor Coating Integrity.</u>

### Item 3

#### Description

This modification revises and clarifies the first note in Permit Attachment L, Table L-6, *Analytical Parameter and Sample Requirements*. WIPP SOP, “WP 02-EM1006” was changed to “WP 02-EM1010”. The note was clarified by changing “data are...” to “information in this table is from SOP WP 02-EM1010 and is provided as information only” This modification also corrects typographical errors in columns 16 and 17 by deleting the “?” in column 16 row 1 and the “4” in column 17 row 2.

#### Basis

The footnote change is classified under “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).

The correction of the typographical errors is classified under “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

Procedure WP 02-EM1006 was incorporated into WP 02-EM1010 in 2012 and updated in Permit Attachment L, Table L-3, *Standard Operating Procedures Applicable to the DMP*, in a Class 1 PMN, dated May 3, 2012. This change revises the procedure number in the first note of Table L-6 with the procedure number that is currently in Table L-3 and clarifies the language used in the note as described above. This change also corrects typographical errors in columns 16 and 17. This change ensures consistency with the procedure listed in Table L-3 and accuracy of the Permit.

Proposed Revised Permit Text:

**Table L-6  
Analytical Parameter and Sample Requirements**

(10) PARAMETERS	(12) NO. OF BOTTLES	(13) VOLUME	(14) TYPE	(15) ACID WASH	(16) SAMPLE FILTER	(17) PRESERVATIVE	(18) HOLDING TIME
Indicator <sup>1</sup> Parameters: <ul style="list-style-type: none"> <li>• pH</li> <li>• SC</li> <li>• TOC</li> </ul>	- - 4	25 ml <sup>2</sup> 100 ml <sup>2</sup> 15 ml <sup>2</sup>	Glass Glass Glass	Field determined Field determined yes	No <sup>2</sup> No No	Field determined Field determined HCl	None None 28 days <sup>2</sup>
General Chemistry	1	1 Liter	Plastic	Yes	No	HNO <sub>3</sub> , pH<2	not specified in DMP
Phenolics	1	1 Liter	Amber Glass	Yes	No	H <sub>2</sub> SO <sub>4</sub> , pH<2	not specified in DMP
Metals/Cations	2	1 Liter	Plastic	Yes	No	HNO <sub>3</sub> , pH<2	6 months <sup>2,3</sup>
VOC	4	40 ml	Glass	No	No	HCL, ph<2	14 days <sup>2</sup>
VOC (Purgable)	2	40 ml	Glass	No	No	HCL, ph<2	14 days <sup>2</sup>
VOC (Non-Purgable)	2	40 ml	Glass	No	No	HCL, ph<2	14 days <sup>2</sup>
BN/As	1	½ Gallon	Amber Glass	Yes	No	None	
TCLP	1	1 Liter	Plastic	Yes	No	HNO <sub>3</sub> , pH<2	7 days <sup>2</sup>
Cyanide (Total)	1	1 Liter	Plastic	Yes	No	NaOH, pH>12	14 days <sup>2</sup>
Sulfide	1	250 ml	Amber Glass	Yes	No	NaOH + Zn Acetate	28 days <sup>2</sup>
Radionuclides	1	1 Gallon	Plastic Cube	Yes	Yes	HNO <sub>3</sub> , pH<2	6 months <sup>2</sup>

1 = RCRA Detection Monitoring Analytes

2 = As specified in Table 4-1 of the RCRA TEGD

3 = Reduced holding time of 1 week for WIPP-specific Divalent cation 2 samples noted in the GMD

Note: Unless otherwise indicated, information data in this table is from SOP DOE Procedure WP 02-EM 1010-1006 methods and is provided as information only.

Note: Deviations from this table are allowed with prior approval by the NMED.

## Item 4

### Description

This modification updates Permit figures to reflect a temporary change to the northwest section of the Property Protection fence line, aligns the Property Protection Area (**PPA**) security barrier with the RCRA regulations to allow for use of material other than chain link fencing, and incorporates an additional figure from an implementing document in the current *WIPP Emergency Management Plan*, which depicts off site evacuation routes. This modification also updates the Permit figures to reflect a change in a building location, the removal of a building, and add labels to an existing building.

This modification updates the following Permit figures to reflect a temporary change to the northwest section of the PPA fence line:

- Attachment A4, Figure A4-2, *WIPP Traffic Flow Diagram*
- Attachment D, Figure D-1, *WIPP Surface Structures*
- Attachment D, Figure D-5, *Fire-Water Distribution System*
- Attachment D, Figure D-6, *WIPP On-Site Assembly Areas and Off-Site Staging Areas*

This modification updates Permit Part 2, Section 2.6.2., *Barrier*, Permit Part 2, Section 2.6.4. *Warning Signs*, and Permit Attachment A, Section A-3, *Property Description* to align the PPA security barrier with the RCRA regulations to allow for use of material other than chain link fencing.

This modification modifies Permit Attachment D to reflect the current documents in the *WIPP Emergency Management Plan* and clarifies evacuation routes at the facility in the following ways:

- Replaces Figure D-8 with updated figure incorporating directional north arrow
- Changes Figure D-8 *WIPP Site Evacuation Routes* title to *WIPP Site Evacuation Map*
- Adds Figure D-8a, *WIPP Site Evacuation Routes* to reflect and incorporate recent changes to implementing documents of the *WIPP Emergency Management Plan*
- Updates the Permit text in Sections D-8a, *Surface Evacuation On-site and Off-site Staging Areas* and D-8e, *Further Site Evacuation*, to clarify emergency event evacuation and figure references
- Adds Figure D-8a *WIPP Site Evacuation Routes* to the List of Figures

This modification removes Building 918 and updates the location of Building 918A in the following figures:

- Attachment A4, Figure A4-2, *WIPP Traffic Flow Diagram*
- Attachment A4, Figure A4-2-NFB, *WIPP Traffic Flow Diagram with Building 416*
- Attachment D, Figure D-1, *WIPP Surface Structures*
- Attachment D, Figure D-1a, *Legend to Figure D-1*
- Attachment D, Figure D-1-NFB, *WIPP Surface Structures with Building 416*
- Attachment D, Figure D-1a-NFB, *Legend to Figure D-1-NFB (Building 416)*

- Attachment D, Figure D-5, *Fire-Water Distribution System*
- Attachment D, Figure D-5-NFB, *Fire-Water Distribution with Building 416*
- Attachment D, Figure D-6, *WIPP On-Site Assembly Areas and Off-Site Staging Areas*
- Attachment D, Figure D-6-NFB, *WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416*

This modification incorporates a label for Building 413B in the following figures:

- Attachment D, Figure D-1, *WIPP Surface Structures*
- Attachment D, Figure D-1-NFB, *WIPP Surface Structures with Building 416*

## **Basis**

The change is classified under “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**

A temporary fence has been constructed pursuant to Permit Part 2, Section 2.6.2., *Barrier*, in the northwest corner of the PPA to facilitate construction work at the Air Intake Shaft (**AIS**). The temporary fence is located within the current PPA fence as shown in the updated Figures A4-2, D-1, D-5, and D-6. The temporary barrier is seven feet high and topped with three strands of barbed wire for a total height of eight feet, and contains no normal access point or points of entry to the active portion of the facility (i.e., the portion of the facility where hazardous waste management activities are performed).

In the process of constructing the temporary fence, Building 918A was relocated to the northeast corner of building 918B and Building 918 was removed. All figures depicting the overall site layout have been updated to incorporate the new location of Building 918A and the removal of Building 918 for completeness and accuracy of the Permit.

Because the temporary PPA barrier may include structure walls instead of chain link fence, an update to Permit Part 2, Section 2.6.2., *Barrier*, was necessary. This update aligns the allowed PPA security barrier for use at the WIPP facility more closely with the RCRA regulatory requirements of a barrier in 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)(i)). The regulatory requirement in 40 CFR §264.14(b)(2)(i) specifies that for security a facility must have “*An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff), which completely surrounds the active portion of the facility.*” Updates to Permit Part 2, Section 2.6.4., *Warning Signs*, and Permit Attachment A, Section A-3, *Property Description*, were also necessary to align with the updates to the updated barrier definition at the WIPP Site.

The temporary barrier was constructed to control entry to the active portion of the facility as required by Permit Part 2, Section 2.6.3., *Means to Control Entry*. Both the temporary barrier and the original PPA fence are inspected in accordance with Permit Attachment E, Table E-1. An additional temporary gate was installed along the southernmost portion of the temporary barrier for security control and alternate exit for onsite personnel working within the PPA in the event of an emergency. The off-site staging areas posted on the original PPA fence will remain in place for use in case of site emergencies. The gate at the northwest corner of the current PPA will be open during the day shift to allow subcontractors to work on the AIS without having



to pass through security. Once the day shift is complete the gate will be locked. After the work on the AIS is completed, the PPA fence line will be returned to its original configuration and the temporary barrier removed. These changes are needed to update the Permit with the new temporary PPA barrier that will be used to facilitate construction work at the AIS.

For clarity, red boxes are provided in the original Permit figures to emphasize the changes to the figures. The temporary barrier change will not need to be incorporated into Permit Attachment A2, Figure A4-2-NFB, or Permit Attachment D, Figures D-1-NFB, D-5-NFB, and D-6-NFB. These figures show the future layout of the WIPP facility which will not include the temporary PPA barrier described in this PMN.

In addition to the changes due to the temporary barrier construction, Figure D-8, *WIPP Site Evacuation Routes* has been replaced with an identical figure incorporating a directional north arrow and renamed *WIPP Site Evacuation Map*. Figure D-8a, *WIPP Site Evacuation Routes*, has been added to Attachment D to be consistent with the current implementing documents contained in the *WIPP Emergency Management Plan*. Figure D-8a is a satellite image depicting the WIPP site and highlighting the evacuation roads for further site evacuation. These changes are needed to ensure consistency between the Permit and the current *WIPP Emergency Management Plan* implementing documents.

In addition to the changes to Figure D-8 (the title change and adding a directional north arrow) and adding Figure D-8a, Sections D-8a, *Surface Evacuation On-site and Off-site Staging Areas*, and D-8e, *Further Site Evacuation*, of the Permit text have been updated to reflect the changes made to the figures in the current *WIPP Emergency Management Plan*. These updates include adding the description of the south evacuation gate in Section D-8a, *Surface Evacuation On-site and Off-site Staging Areas*, and distinguishing that the east and south gates are alternate evacuation routes. Updates to Section D-8e, *Further Site Evacuation*, include the addition of the Campbell road evacuation route as a route for further site evacuation and the primary and alternative evacuation routes are depicted in Figures D-8 and D-8a.

Figures D-1 and D-1-NFB have also been updated to incorporate the labeling of Building 413B for completeness and alignment with the respective figure legends, Figures D-1a and D-1a-NFB. These changes are needed to ensure completeness and accuracy of the Permit.

## Proposed Revised Permit Text:

### 2.6.2. Barrier

The PPA shall be enclosed by a permanent security barrier consisting of seven ft high chain-link fence, or other material, topped by three strands of barbed wire, for a total height of eight ft. The fence shall completely surround all major surface structures, or connect to structures as part of the barrier, on the active portion of the facility and shall also be inspected as specified in Permit Attachment E to ensure it remains in good repair, in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)(i)).

### 2.6.4. Warning Signs

The Permittees shall post “No Trespassing” signs and “Danger: Authorized Personnel Only” signs in English and Spanish at approximately 50 ft intervals on the permanent security barrier ~~chain-link fence~~ surrounding the PPA. The signs shall be legible from a distance of 25 ft and shall be visible from any approach to the facility. These same signs, plus security and traffic signs, shall also be located on the controlled gates, in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(c)).

## A-3 Property Description

The WIPP property has been divided into functional areas. The Property Protection Area (**PPA**), is surrounded by a security barrier ~~chain-link security fence~~, which encompasses approximately 34 acres without the New Filter Building (**NFB**) and approximately 44 acres with the NFB and provides security and protection for all major surface structures. The DOE Off Limits Area encloses the PPA, and is approximately 1,454 acres. These areas define the DOE exclusion zone within which certain items and material are prohibited. The final zone is marked by the WIPP Site Boundary (WIPP Land Withdrawal Area), a 16-section Federal land area under the jurisdiction of the DOE.

## D-8a Surface Evacuation On-site and Off-site Staging Areas

Figure D-6 shows the surface assembly and staging areas and the evacuation gates. Security officers remain at the primary staging area gate 24 hours a day, and the vehicle trap is opened for personnel during emergency evacuations. The north gate has a single-person gate and a large gate which can be opened, similar to the main gates for the primary staging area. Alternative evacuation route exit points are located at the east and south gates. The east and south gates are ~~is~~ a turnstile gates. Upon notification, security personnel will respond, open gates, and facilitate egress for evacuation.

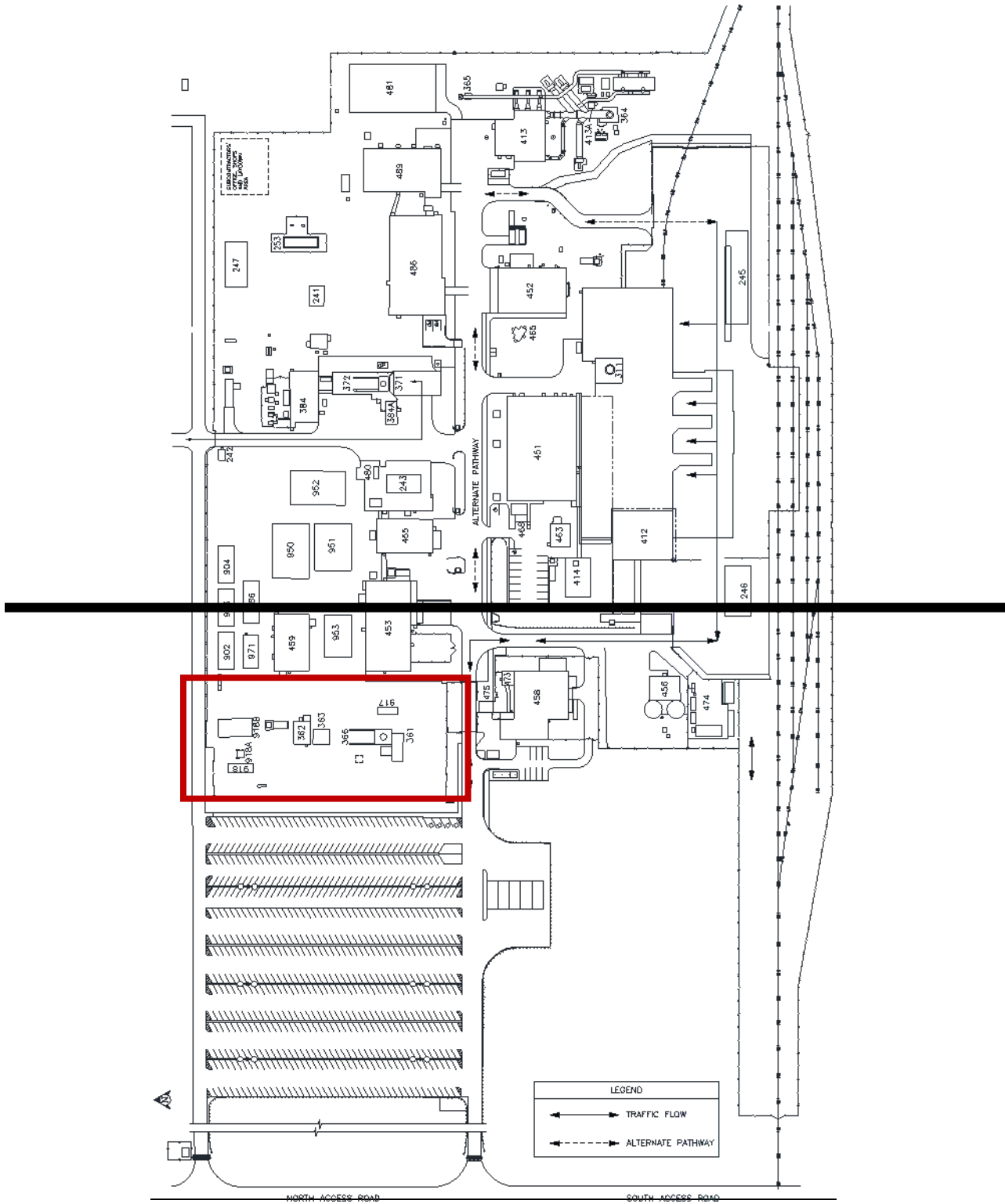
## D-8e Further Site Evacuation

The primary evacuation routes for the WIPP facility are the main DOE north/south access road, which connects to U.S. Highways 62/180 (north) and State Highway 128 (south). Alternate

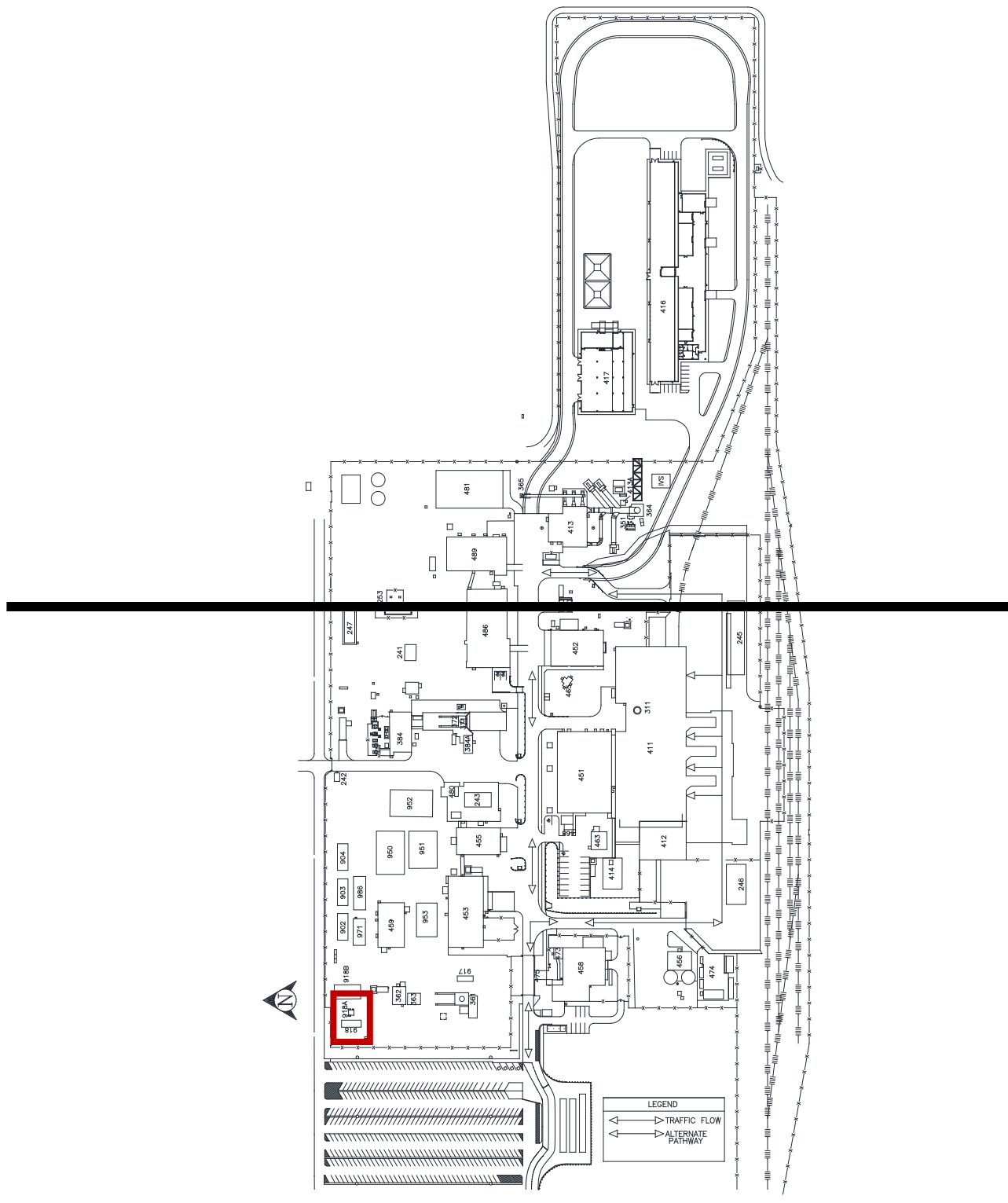
evacuation routes from the facility are provided at the south side and the east side of the facility (Figure D-8). Utilization of the alternate evacuation routes leads to either the main DOE north/south access road or Campbell Road, which travels north and intersects with U.S. Highway 62/180. The primary and alternate evacuation routes are depicted in Figures D-8 and D-8a.

## LIST OF FIGURES

Figure	Title
Figure D-1	WIPP Surface Structures
Figure D-1-NFB	WIPP Surface Structures with Building 416
Figure D-1a	Legend to Figure D-1
Figure D-1a-NFB	Legend to Figure D-1-NFB (Building 416)
Figure D-2	Spatial View of the WIPP Facility
Figure D-3	WIPP Underground Facilities
Figure D-4	Underground Escape and Evacuation Map
Figure D-5	Fire-Water Distribution System
Figure D-5-NFB	Fire-Water Distribution System with Building 416
Figure D-6	WIPP On-Site Assembly Areas and Off-Site Staging Areas
Figure D-6-NFB	WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416
Figure D-6a	RH Bay Evacuation Routes
Figure D-6b	RH Bay Hot Cell Evacuation Route
Figure D-6c	Evacuation Routes in the Waste Handling Building
Figure D-7	Designated Underground Assembly Areas
Figure D-8	WIPP Site Evacuation <u>Map</u> Route
<u>Figure D-8a</u>	<u>WIPP Site Evacuation Routes</u>







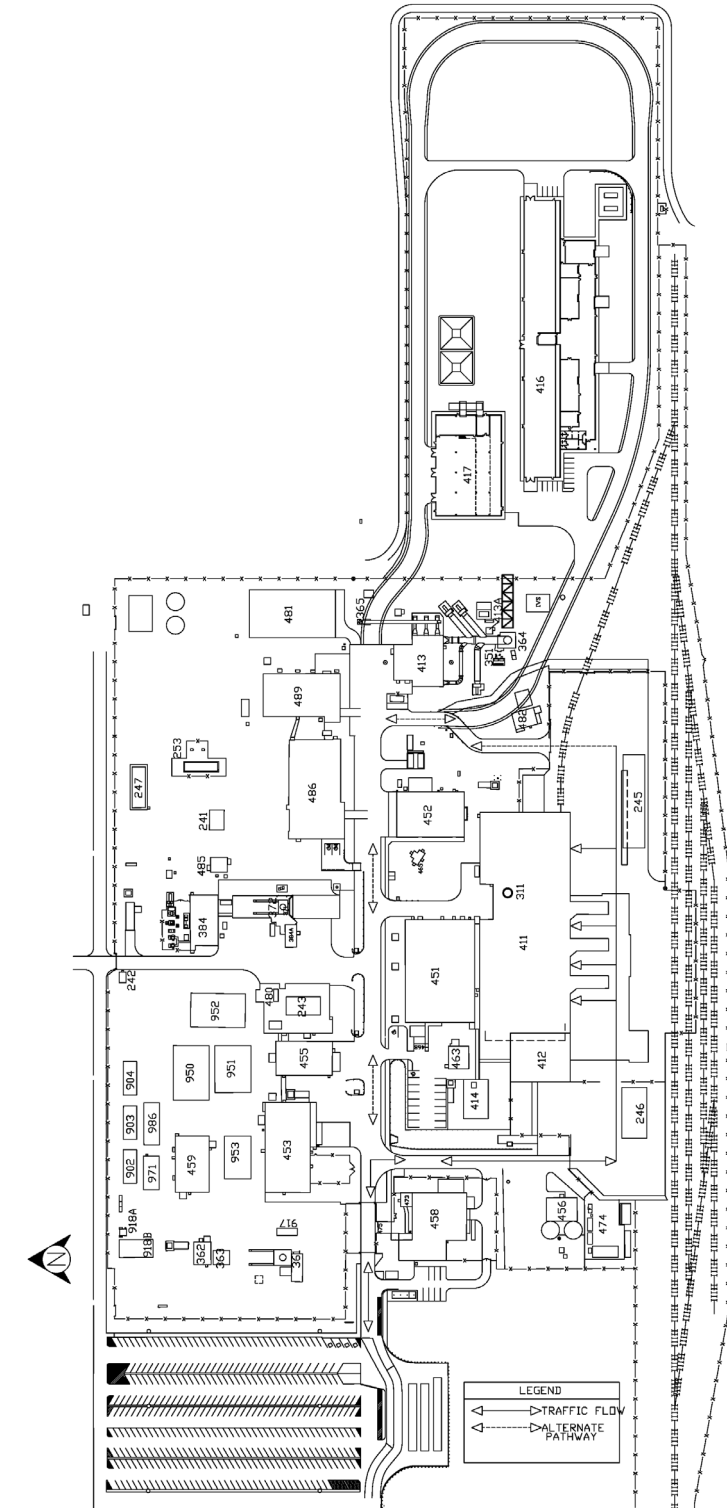
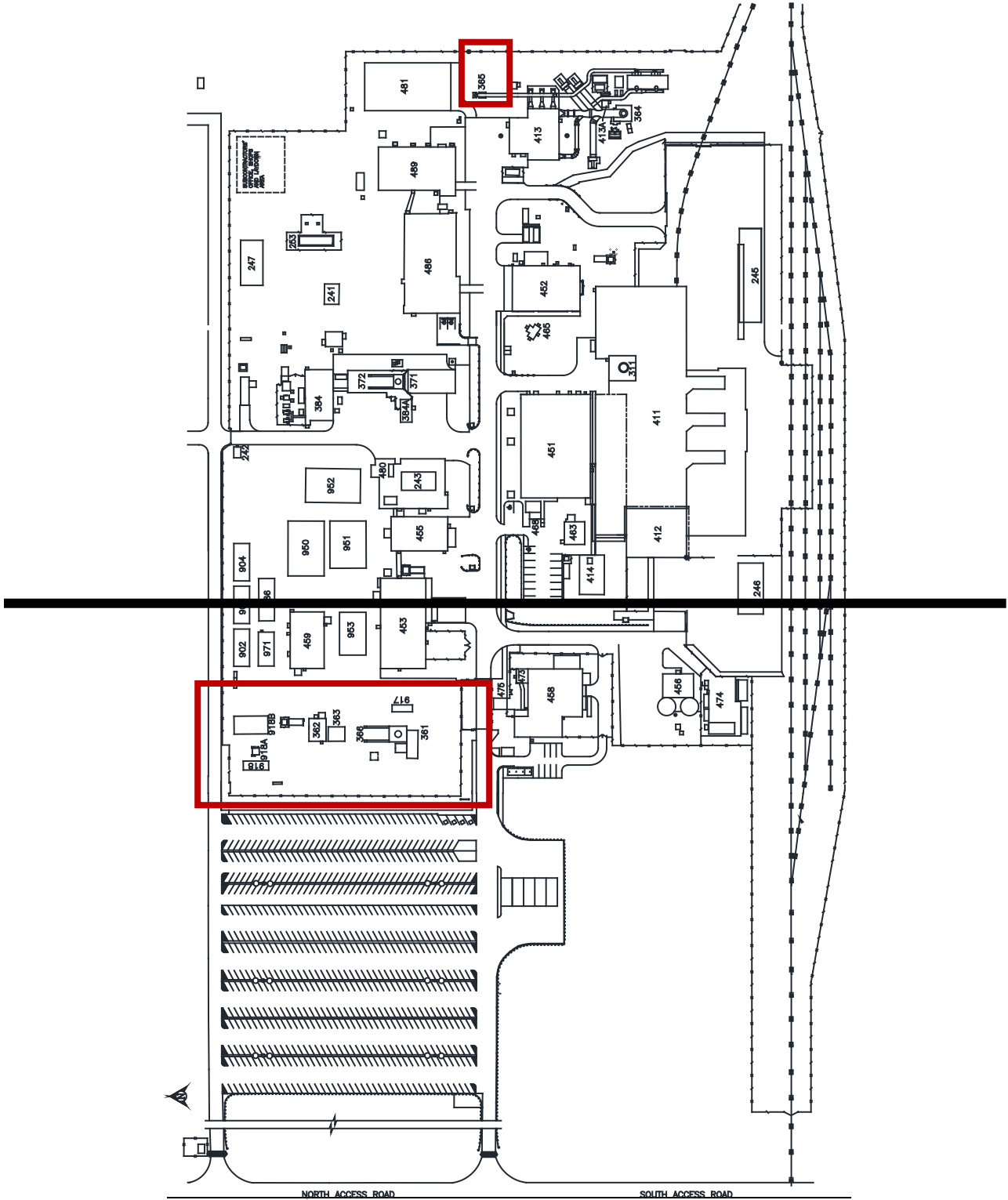
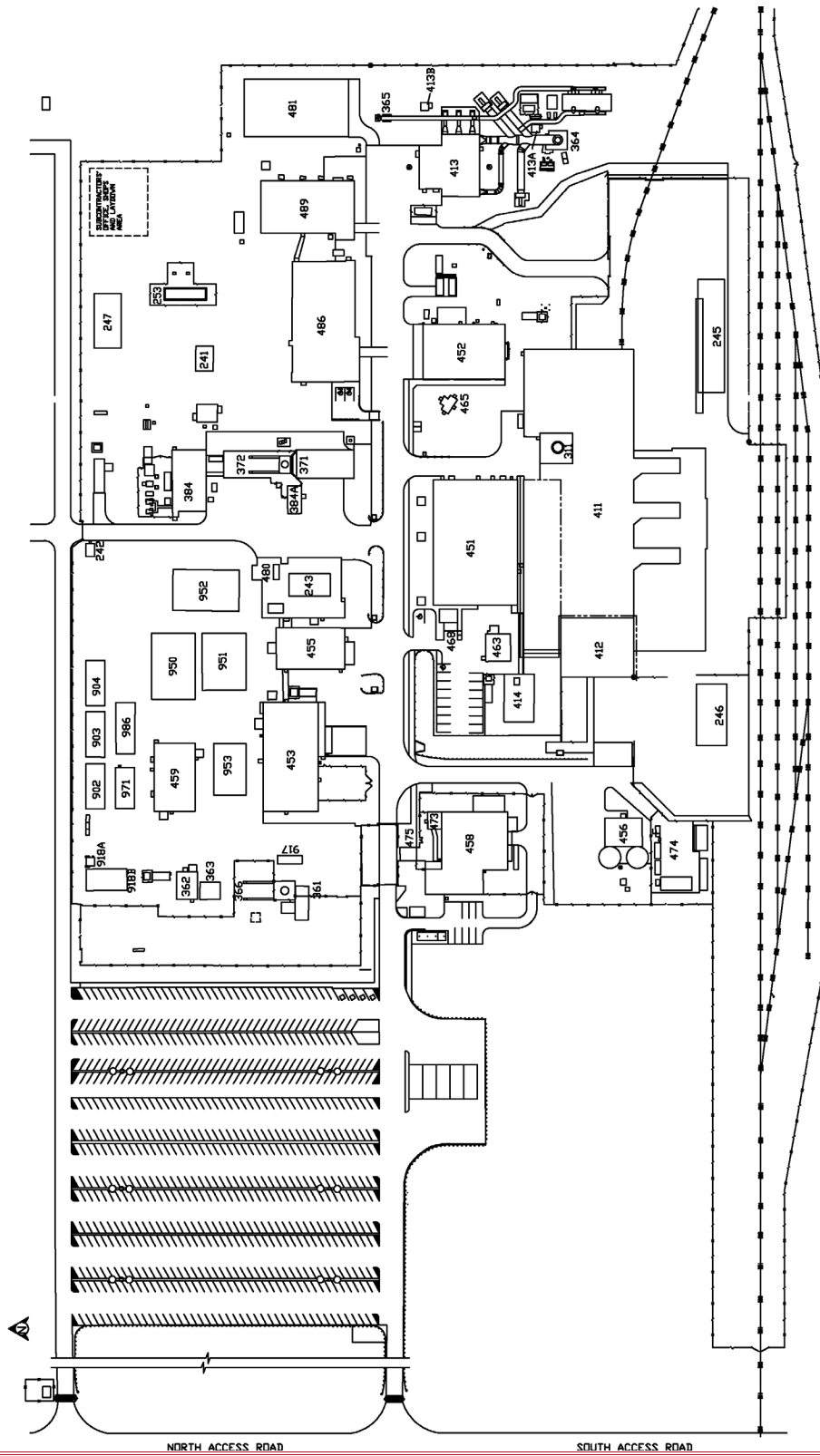


Figure A4-2-NFB  
 WIPP Traffic Flow Diagram with Building 416





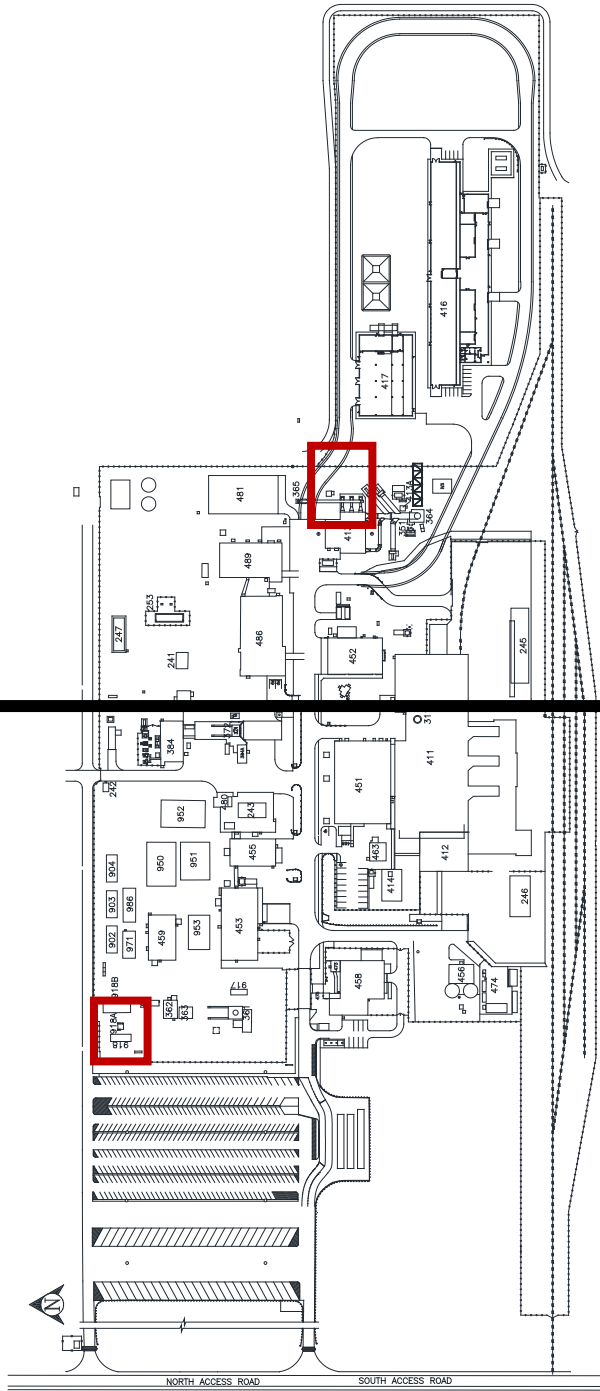


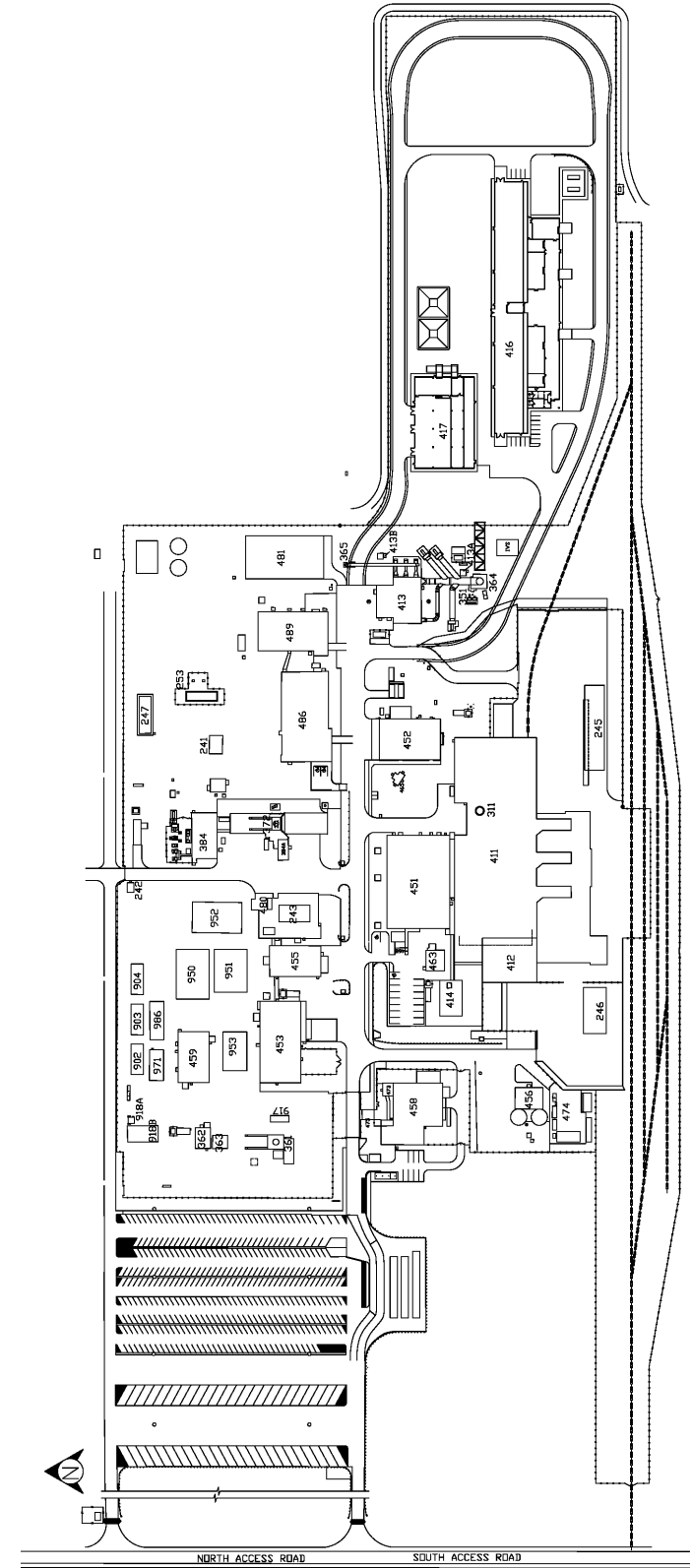
**Figure D-1**  
**WIPP Surface Structures**

BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#384	SALT HANDLING SHAFT HOISTHOUSE	#475	GATEHOUSE
#242	GUARDSHACK	#384A	MINING OPERATIONS	#480	VEHICLE FUEL STATION
#243	SALT HAULING TRUCKS SHELTER	#411	WASTE HANDLING BUILDING	#481	WAREHOUSE ANNEX
#245	TRUPACT TRAILER SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25p-SWG15/1	#413A	MONITORING STATION A	#H-16	SANDIA TEST WELL
#254.1	AREA SUBSTATION NO.1 25P-SW15.1	#413B	MONITORING STATION B	#917	AIS MONITORING
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#414	WATER CHILLER FACILITY & BLDG	#918	VOC TRAILER
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#451	SUPPORT BUILDING	#918A	VOC AIR MONITORING STATION
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918B	VOC LAB TRAILER
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#453	WAREHOUSE/SHOPS BUILDING	#950	WORK CONTROL TRAILER
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#455	AUXILLIARY WAREHOUSE BUILDING	#951	PROCUREMENT/PURCHASING
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#456	WATER PUMPHOUSE	#952	TRAILER
<del>#254.8</del>	<del>AREA SUBSTATION NO.8 25P-SW15.8</del>	<del>#457N</del>	<del>WATER TANK 25-D-001B</del>	<del>#953</del>	<del>MODULAR OFFICE COMPLEX</del>
#254.9	480V SWITCHGEAR (25P-SWGO4/9)	#457S	WATER TANK 25-D-001A	#971	HUMAN RESOURCES TRAILER
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#458	GUARD AND SECURITY BUILDING	#986	PUBLICATIONS & PROCEDURES TRAILER
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#459	CORE STORAGE BUILDING	SWR NO.6	SWITCHRACK NO. 6
#256.4	SWITCHBOARD #4 (25P-SBD04/4)	#463	COMPRESSOR BUILDING	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#311	WASTE SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.7C	SWITCHRACK NO. 7C
#351	EXHAUST SHAFT	#468	TELEPHONE HUT	SWR NO.10	SWITCH RACK NO. 10
#361	AIR INTAKE SHAFT	#473	ARMORY BUILDING	SWR NO.11	SWITCH RACK NO. 11
#362	AIR INTAKE SHAFT/HOIST HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.12	SWITCH RACK NO. 12
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474A	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.15	SWITCH RACK NO. 15
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474B	HAZARDOUS WASTE STORAGE BUILDING		
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474C	OIL & GREASE STORAGE BUILDING		
#366	AIR INTAKE SHAFT HEADFRAME	#474D	GAS BOTTLE STORAGE BUILDING		
#371	SALT HANDLING SHAFT	#474E	HAZARD MATERIAL STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474F	WASTE OIL RETAINER		

BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#384	SALT HANDLING SHAFT HOISTHOUSE	#475	GATEHOUSE
#242	GUARDSHACK	#384A	MINING OPERATIONS	#480	VEHICLE FUEL STATION
#243	SALT HAULING TRUCKS SHELTER	#411	WASTE HANDLING BUILDING	#481	WAREHOUSE ANNEX
#245	TRUPACT TRAILER SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25P-SWG15/1	#413A	MONITORING STATION A	#H-16	SANDIA TEST WELL
#254.1	AREA SUBSTATION NO.1 25P-SW15. 1	#413B	MONITORING STATION B	#917	AIS MONITORING
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#414	WATER CHILLER FACILITY & BLDG	#918A	VOC AIR MONITORING STATION
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#451	SUPPORT BUILDING	#918B	VOC LAB TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#452	SAFETY & EMERGENCY SERVICES FACILITY	#950	WORK CONTROL TRAILER
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#453	WAREHOUSE/SHOPS BUILDING	#951	PROCUREMENT/PURCHASING
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#455	AUXILLIARY WAREHOUSE BUILDING	#952	TRAILER
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#456	WATER PUMPHOUSE	#953	MODULAR OFFICE COMPLEX
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#457N	WATER TANK 25-D-001B	#971	HUMAN RESOURCES TRAILER
#254.9	480V SWITCHGEAR (25P-SWG04/9)	#457S	WATER TANK 25-D-001A	#986	PUBLICATIONS & PROCEDURES TRAILER
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#458	GUARD AND SECURITY BUILDING	SWR NO.6	SWITCHRACK NO. 6
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#459	CORE STORAGE BUILDING	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#256.4	SWITCHBOARD #4 (25P-SBD04/4)	#463	COMPRESSOR BUILDING	SWR NO.7C	SWITCHRACK NO. 7C
#311	WASTE SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.10	SWITCH RACK NO. 10
#351	EXHAUST SHAFT	#468	TELEPHONE HUT	SWR NO.11	SWITCH RACK NO. 11
#361	AIR INTAKE SHAFT	#473	ARMORY BUILDING	SWR NO.12	SWITCH RACK NO. 12
#362	AIR INTAKE SHAFT/HOIST HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.15	SWITCH RACK NO. 15
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474A	HAZARDOUS WASTE STORAGE BUILDING		
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474B	HAZARDOUS WASTE STORAGE BUILDING		
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474C	OIL & GREASE STORAGE BUILDING		
#366	AIR INTAKE SHAFT HEADFRAME	#474D	GAS BODLE STORAGE BUILDING		
#371	SALT HANDLING SHAFT	#474E	HAZARD MATERIAL STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474F	WASTE OIL RETAINER		

**Figure D-1a**  
**Legend to Figure D-1**





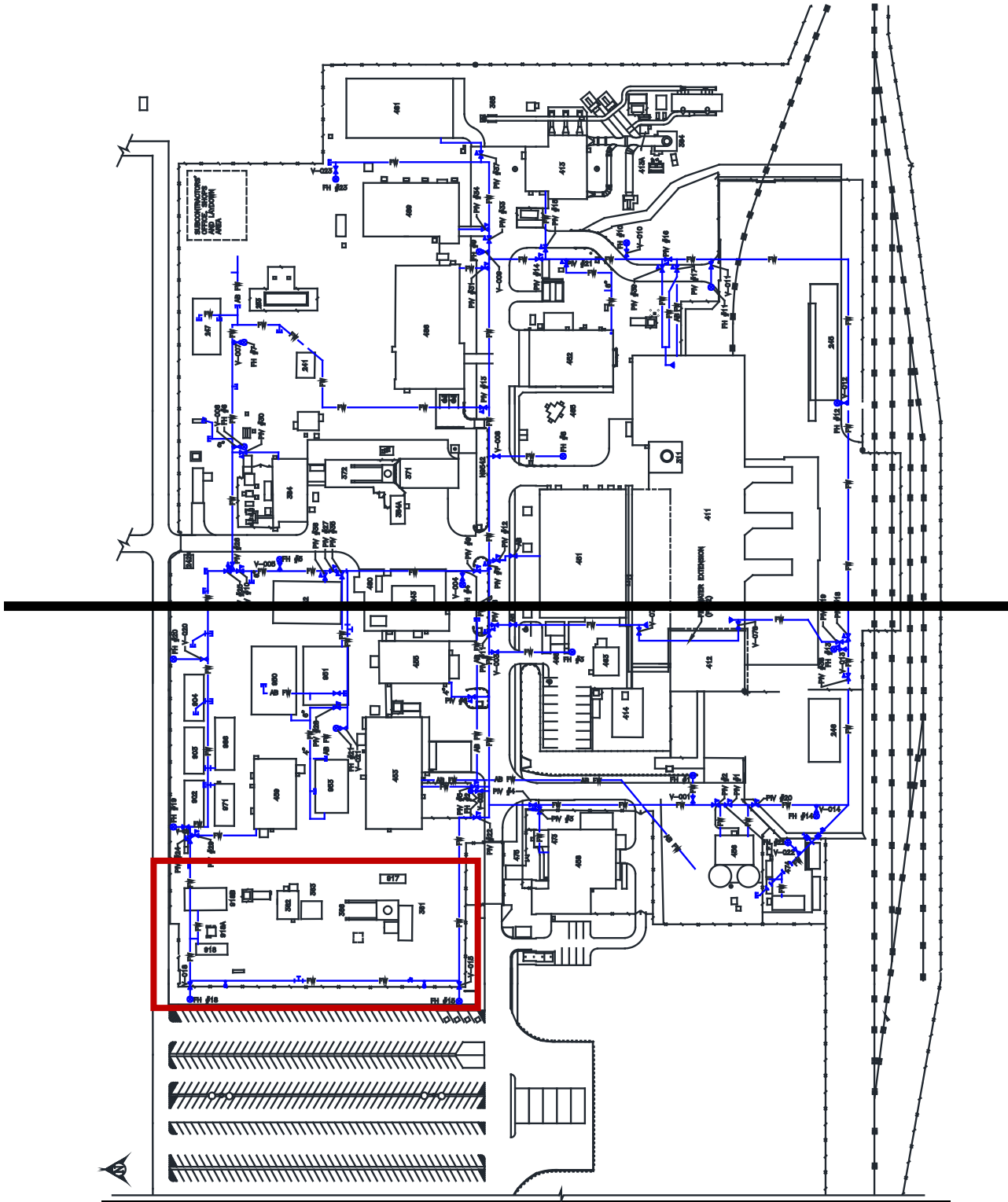
**Figure D-1-NFB**  
**WIPP Surface Structures with Building 416**

BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#384A	MINING OPERATIONS	#475	GATEHOUSE
#242	GUARDSHACK	#411	WASTE HANDLING BUILDING	#480	VEHICLE FUEL STATION
#243	SALT HAULING TRUCKS SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#481	WAREHOUSE ANNEX
#245	TRUPACT TRAILER SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413A	MONITORING STATION A	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25p-SWG 15/1	#413B	MONITORING STATION B	#H-16	SANDIA TEST WELL
#254.1	AREA SUBSTATION NO.1 25P-SW15.1	#414	WATER CHILLER FACILITY & BLDG	#902	TRAILER
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#416	NEW FILTER BUILDING	#903	TRAILER
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#417	SALT REDUCTION BUILDING	#904	TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#451	SUPPORT BUILDING	#917	AIS MONITORING
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918	VOC TRAILER
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#453	WAREHOUSE/SHOPS BUILDING	#918A	VOC AIR MONITORING STATION
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#455	AUXILLIARY WAREHOUSE BUILDING	#918B	VOC LAB TRAILER
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#456	WATER PUMP HOUSE	#950	WORK CONTROL TRAILER
#254.9	480V SWITCHGEAR (25P-SWGO4/9)	#457N	WATER TANK 25-D-001B	#951	PROCUREMENT/PURCHASING
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#457S	WATER TANK 25-D-001A	#952	TRAILER
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#458	GUARD AND SECURITY BUILDING	#953	MODULAR OFFICE COMPLEX
#256.4	SWITCHBOARD #4 (25P-SBDO4/4)	#459	CORE STORAGE BUILDING	#971	HUMAN RESOURCES TRAILER
#311	WASTE SHAFT	#463	COMPRESSOR BUILDING	#986	PUBLICATIONS & PROCEDURES TRAILER
#351	EXHAUST SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.6	SWITCHRACK NO. 6
#361	AIR INTAKE SHAFT	#468	TELEPHONE HUT	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#362	AIR INTAKE SHAFT/HOIST HOUSE	#473	ARMORY BUILDING	SWR NO.7C	SWITCHRACK NO. 7C
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.10	SWITCHRACK NO. 10
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474A	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.11	SWITCHRACK NO. 11
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474B	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.12	SWITCHRACK NO. 12
#366	AIR INTAKE SHAFT HEADFRAME	#474C	OIL & GREASE STORAGE BUILDING	SWR NO.15	SWITCHRACK NO. 15
#371	SALT HANDLING SHAFT	#474D	GAS BOTTLE STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474E	HAZARD MATERIAL STORAGE BUILDING		
#384	SALT HANDLING SHAFT HOISTHOUSE	#474F	WASTE OIL RETAINER		

BLDG/ FAC. #	DESCRIPTION	BLDG/ FAC. #	DESCRIPTION	BLDG/ FAC. #	DESCRIPTION
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#245	TRUPACT TRAILER SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413A	MONITORING STATION A	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25P-SWG15/1	#413B	MONITORING STATION B	#H-16	SANDIA TEST WELL
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#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#417	SALT REDUCTION BUILDING	#904	TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#451	SUPPORT BUILDING	#917	AIS MONITORING
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918A	VOC AIR MONITORING STATION
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#453	WAREHOUSE/SHOPS BUILDING	#918B	VOC LAB TRAILER
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#455	AUXILLIARY WAREHOUSE BUILDING	#950	WORK CONTROL TRAILER
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#456	WATER PUMPHOUSE	#951	PROCUREMENT/PURCHASING
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#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#458	GUARD AND SECURITY BUILDING	#971	HUMAN RESOURCES TRAILER
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#311	WASTE SHAFT	#463	COMPRESSOR BUILDING	SWR NO.6	SWITCHRACK NO. 6
#351	EXHAUST SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#361	AIR INTAKE SHAFT	#468	TELEPHONE HUT	SWR NO.7C	SWITCHRACK NO. 7C
#362	AIR INTAKE SHAFT/HOIST HOUSE	#473	ARMORY BUILDING	SWR NO.10	SWITCH RACK NO. 10
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.11	SWITCH RACK NO. 11
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474A	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.12	SWITCH RACK NO. 12
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474B	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.15	SWITCH RACK NO. 15
#366	AIR INTAKE SHAFT HEADFRAME	#474C	OIL & GREASE STORAGE BUILDING		
#371	SALT HANDLING SHAFT	#474D	GAS BODLE STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474E	HAZARD MATERIAL STORAGE BUILDING		
#384	SALT HANDLING SHAFT HOISTHOUSE	#474F	WASTE OIL RETAINER		

**Figure D-1a-NFB,  
Legend to Figure D-1-NFB (Building 416)**





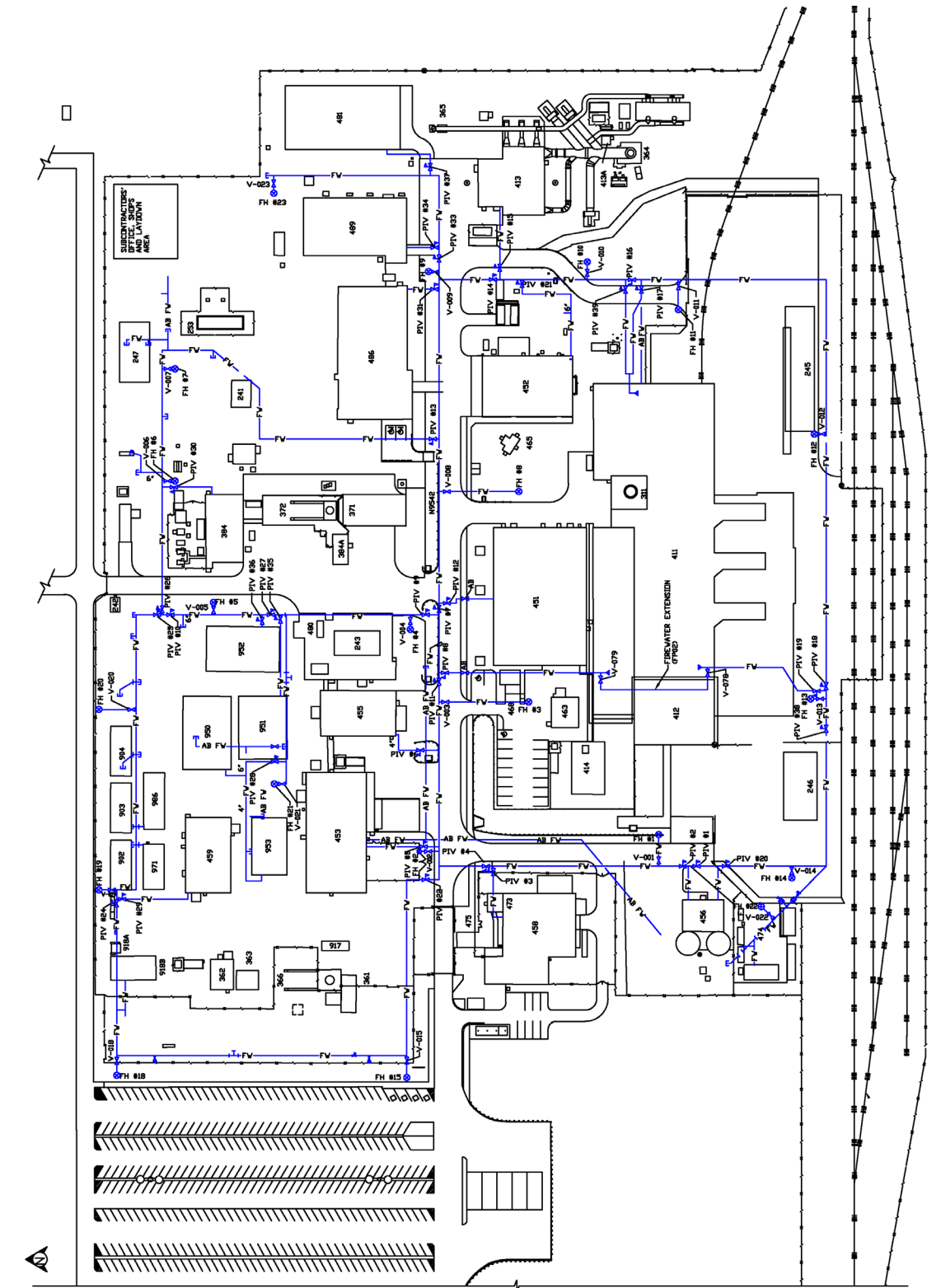
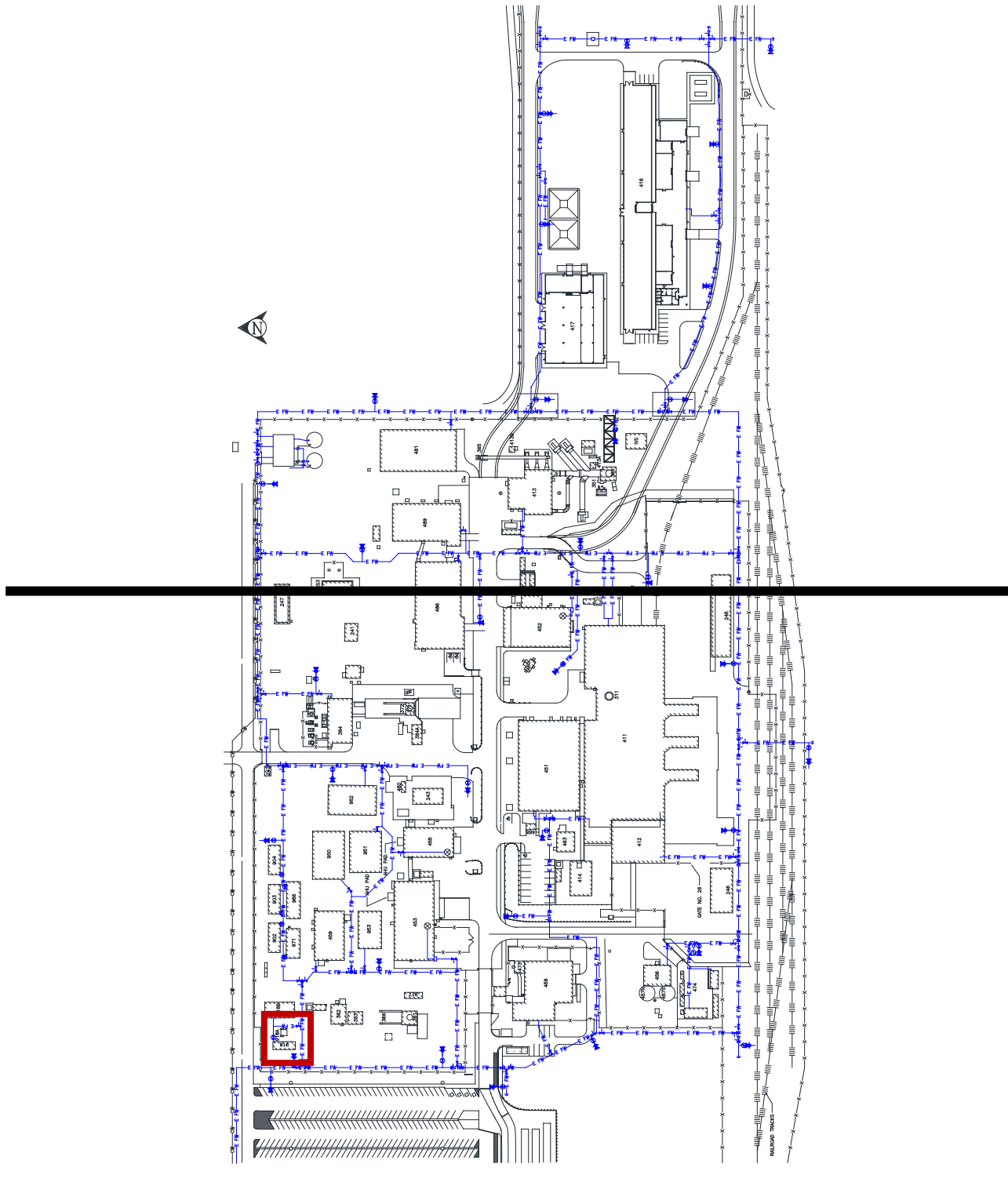
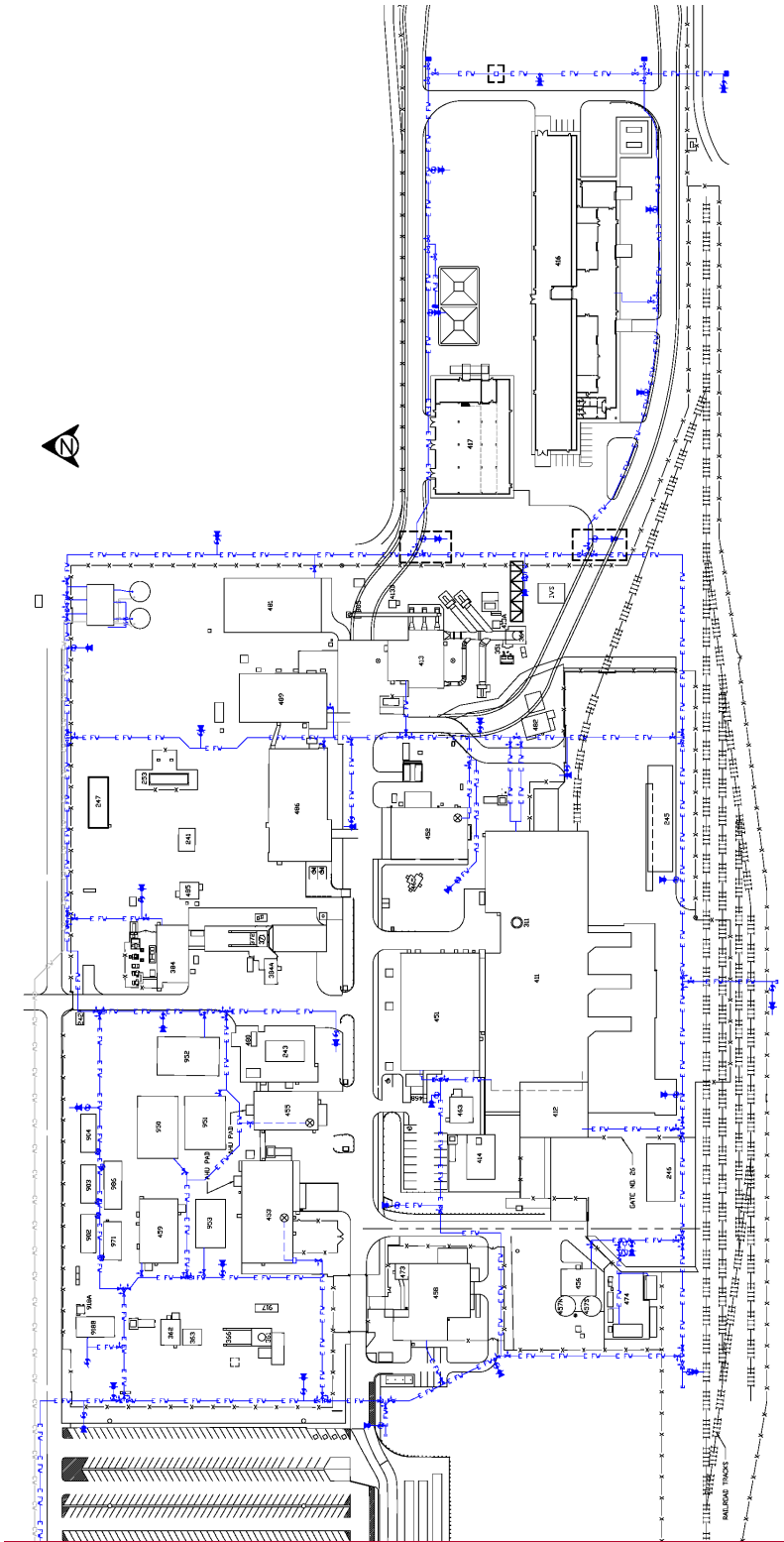
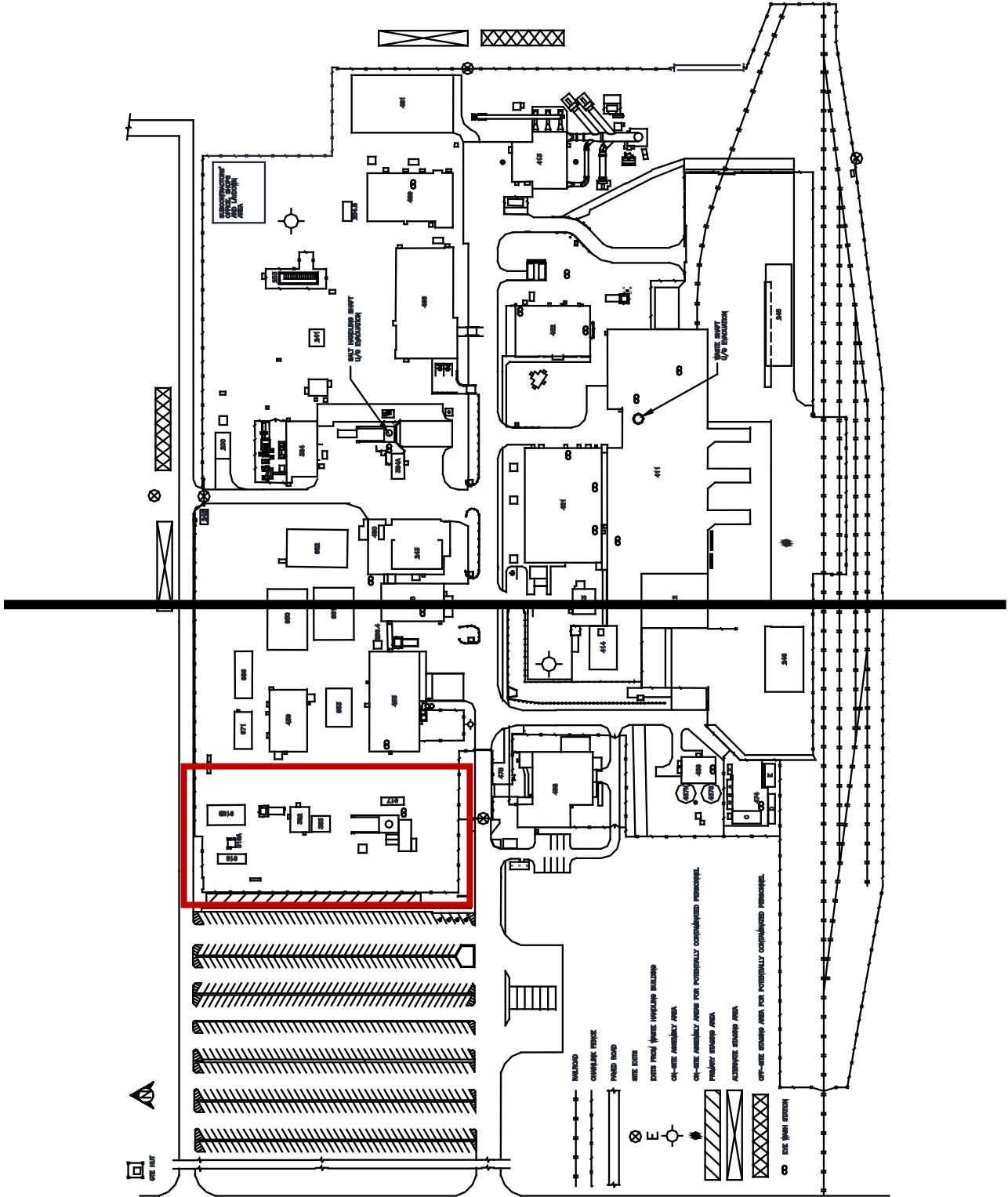


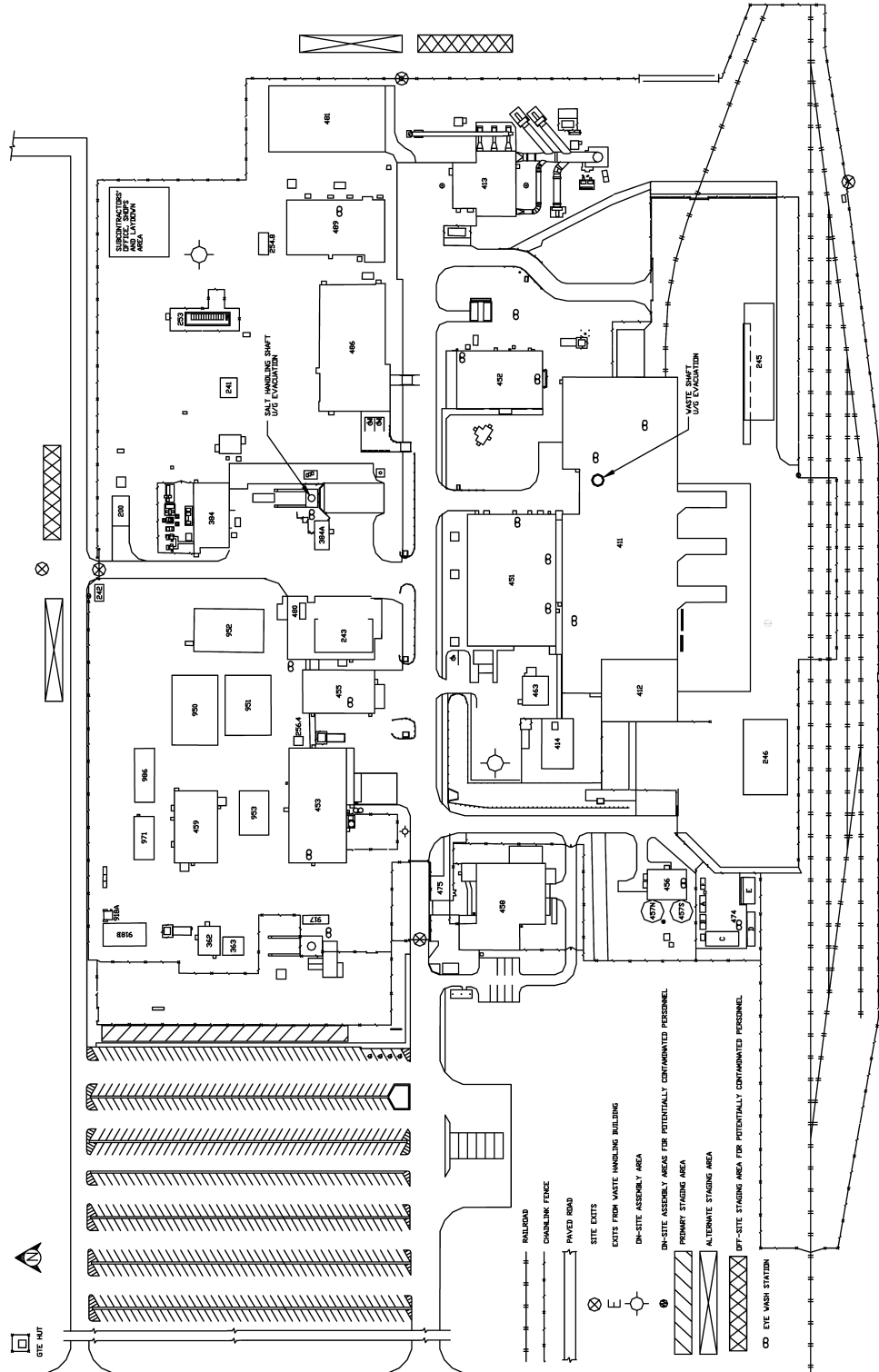
Figure D-5  
Fire-Water Distribution System



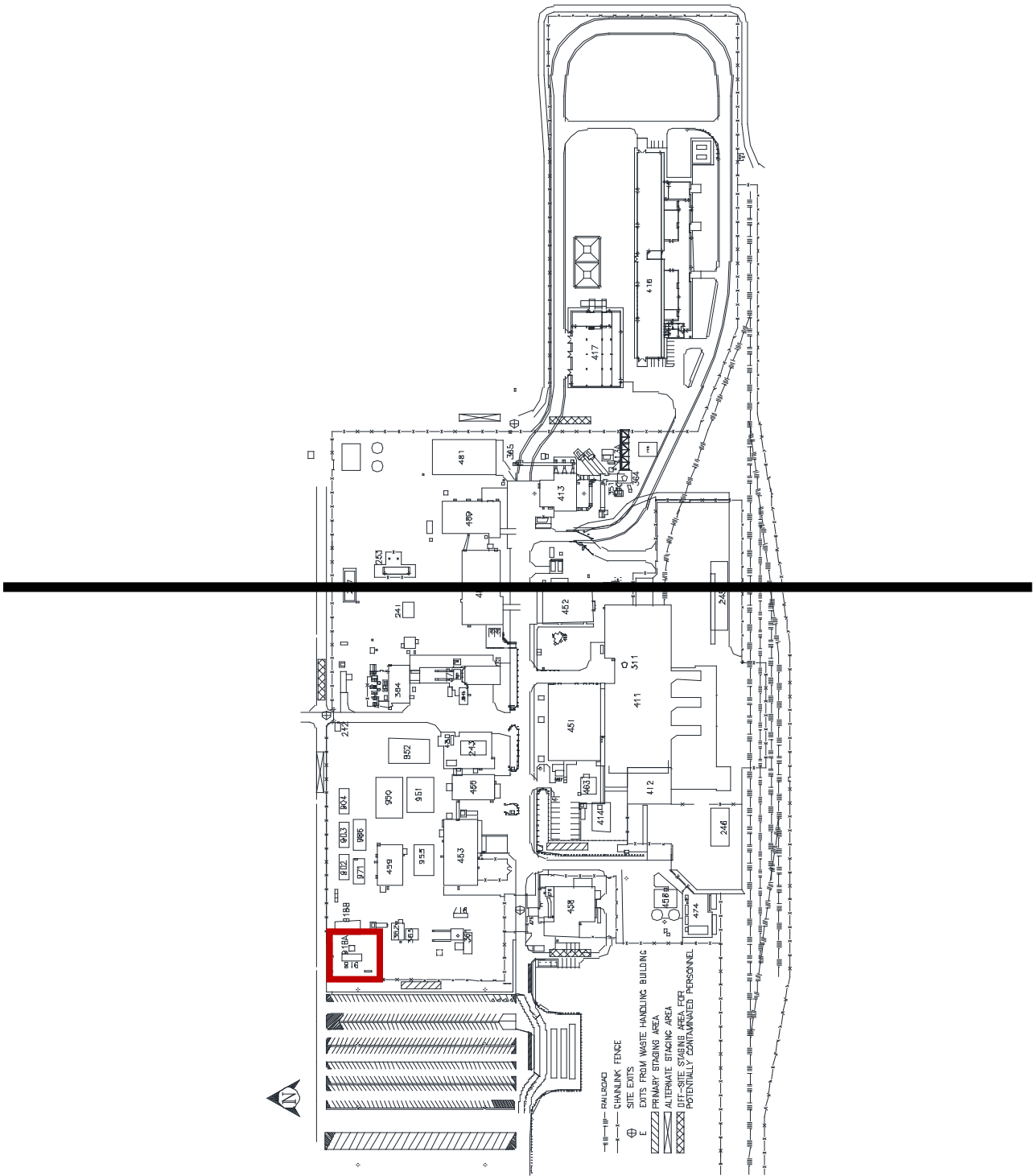


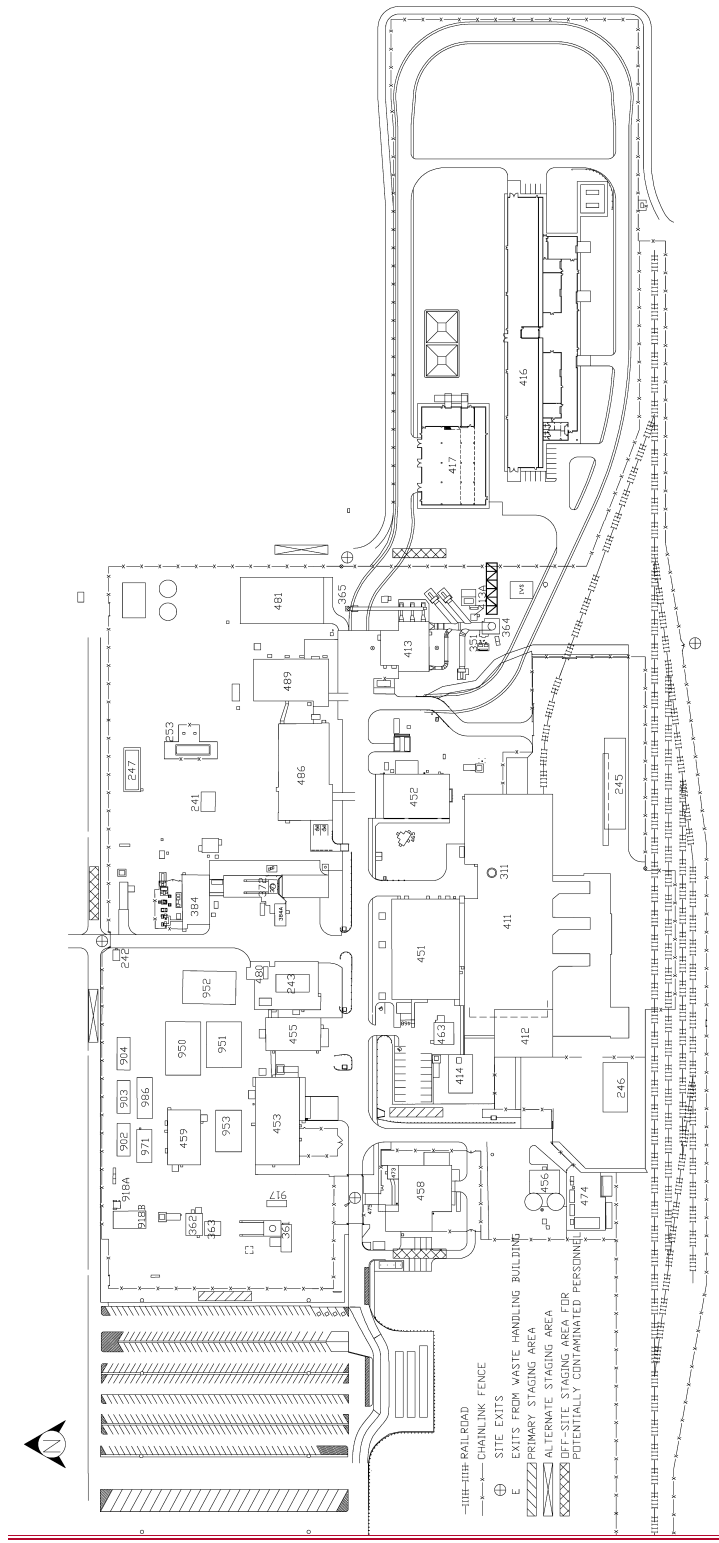
**Figure D-5-NFB**  
**Fire-Water Distribution System with Building 416**





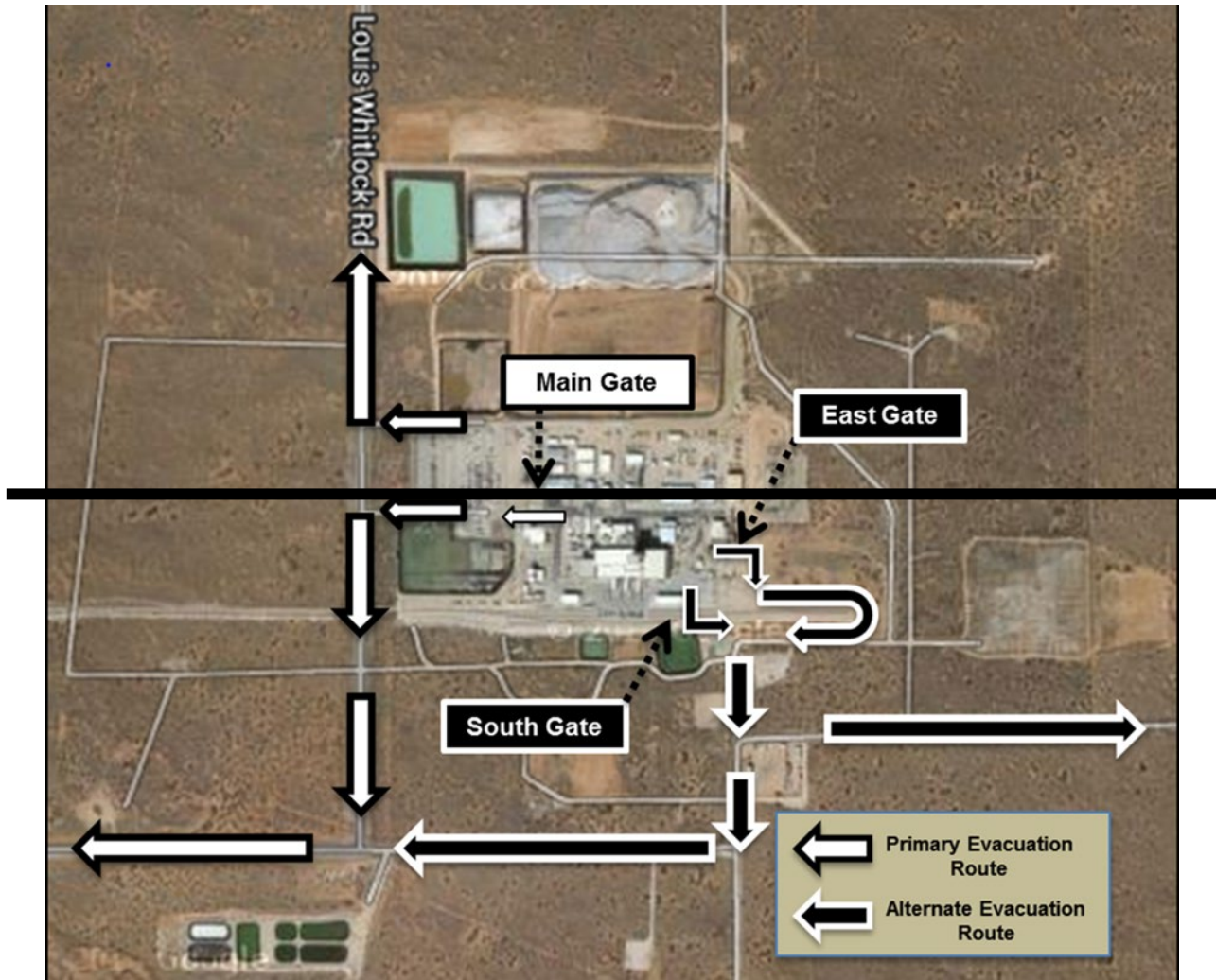
**Figure D-6**  
**WIPP On-Site Assembly Areas and Off-Site Staging Areas**



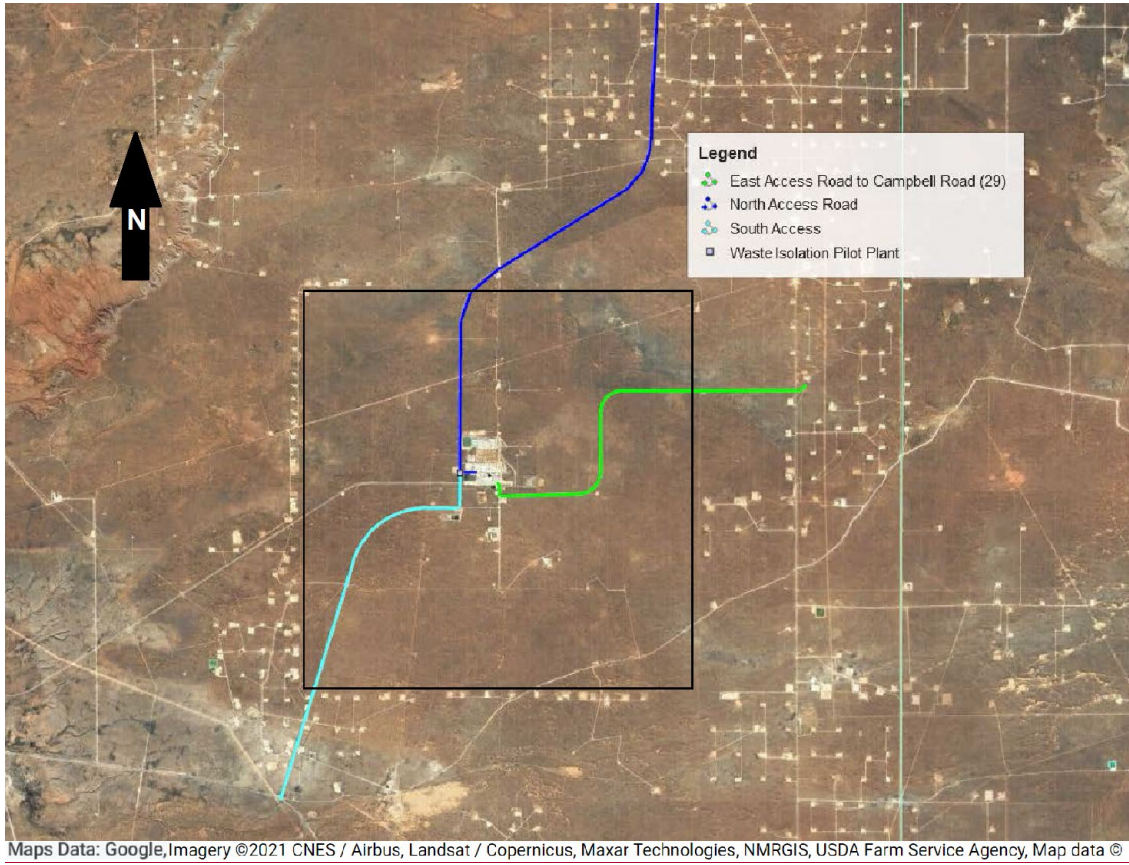


**Figure D-6-NFB**  
**WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416**









**Figure D-8a**  
**WIPP Site Evacuation Routes**

## Item 5

### Description

This modification revises Permit Attachment D, Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators*, with the following changes:

- Adds “J.R. (James) Bailey”
- Adds “M.L. (Martin) Mendes”
- Adds “D.J. (Derek) Tweedy”

### Basis

These changes are classified as “Changes in name, address, or phone number of coordinators or other 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. General Facility Standards, 6. Contingency Plan, d).

### Discussion

The list of persons qualified to act as the RCRA Emergency Coordinator must be kept up to date pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.52(d)). The Permittees are adding three RCRA Emergency Coordinators, J.R. (James) Bailey, M.L. (Martin) Mendes and D.J. (Derek) Tweedy. These changes are necessary to ensure the list of RCRA Emergency Coordinators is current.

**Proposed Revised Permit Text:**

**Table D-1  
Resource Conservation and Recovery Act Emergency Coordinators<sup>1</sup>**

<b>Name</b>	<b>Address*</b>	<b>Office Phone</b>	<b>Personal Phone*</b>	<b>24-Hour Emergency Phone</b>
J.E. (Joseph) Bealler		(575) 234-8276 or (575) 234-8916		(575) 234-8111
M.G. (Mike) Proctor		(575) 234-8276 or (575) 234-8143		(575) 234-8111
P.J. (Paul) Paneral		(575) 234-8498		(575) 234-8111
A.C. (Andy) Cooper		(575) 234-8197		(575) 234-8111
C.J. (Chris) Belis		(575) 628-5851		(575) 234-8111
B.R. (Bobby) Franco		(575) 234-8163		(575) 234-8111
G.W. (Gregory) Brown		(575) 234-5862		(575) 234-8111
R.D. (Ryan) Parrish		(575) 234-8638		(575) 234-8111
R.E. (Eric) Chavez		(575) 234-5831		(575) 234-8111
D.L. (Donald) Journey		(575) 234-8216		(575) 234-8111
R.H. (Robert) Valenzuela		(575) 234-8799		(575) 234-8111
<u>J.R. (James) Bailey</u>		<u>(575) 234-8276</u>		<u>(575) 234-8111</u>
<u>M.L. (Martin) Mendes</u>		<u>(575) 234-5822</u>		<u>(575) 234-8111</u>
<u>D.J. (Derek) Tweedy</u>		<u>(575) 234-8272</u>		<u>(575) 234-8111</u>

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

<sup>1</sup> 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.