



Department of Energy
 Carlsbad Field Office
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October 12, 2021

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

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

Dear Mr. Maestas:

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

- Replacement of the Rescue Truck and Two Fire Trucks with Functionally Equivalent Fire/Rescue Vehicles in Permit Attachment D, *Resource Conservation and Recovery Act (RCRA) Contingency Plan*, and Attachment E, *Inspection Schedule, Process and Forms*
- Updated List of Emergency Response Agreements in Permit Attachment D, *RCRA Contingency Plan*
- Revise Permit Attachment F, *Facility Personnel Permit Training Program*, to Incorporate the Option of Computer and Web Based Training Examinations
- Revise Permit Attachment A4, *Traffic Patterns*

We certify under penalty of law that this document and enclosure 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,

REINHARD KNERR
 Reinhard Knerr
 Manager
 Carlsbad Field Office

Digitally signed by
 REINHARD KNERR
 Date: 2021.10.12
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SEAN DUNAGAN (Affiliate)
 Sean Dunagan
 President and Project Manager
 Nuclear Waste Partnership LLC

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Enclosure

cc: w/enclosure
 N. Barka, NMED *ED
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 CBFO M&RC
 *ED denotes electronic distribution

Class 1 Permit Modification Notifications

- 1. Replacement of the Rescue Truck and Two Fire Trucks with Functionally Equivalent Fire/Rescue Vehicles in Permit Attachment D, *RCRA Contingency Plan*, and Attachment E, *Inspection Schedule, Process and Forms***
- 2. Update List of Emergency Response Agreements in Permit Attachment D, *RCRA Contingency Plan***
- 3. Revise Permit Attachment F, *Facility Personnel Permit Training Program*, to Incorporate the Option of Computer and Web Based Training Examinations**
- 4. Revise Permit Attachment A4, *Traffic Patterns***

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

WIPP Permit Number - NM4890139088-TSDF

October 2021

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Acronyms and Abbreviations

CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
FD	Fire Department
GET	General Employee Training
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
Permit	Waste Isolation Pilot Plant Hazardous Waste Facility Permit
Permittees	U.S. Department of Energy and Nuclear Waste Partnership LLC
PMN	Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
WIPP	Waste Isolation Pilot Plant

Overview of the Permit Modification Notifications

This document contains four 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 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 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, <i>RCRA Contingency Plan</i>, Table D-2, <i>Emergency Equipment Maintained at the Waste Isolation Pilot Plant</i></p> <p>Attachment E, <i>Inspection Schedule, Process and Forms</i>, Table E-1, <i>Inspection Schedule/Procedures</i></p>	<p>This modification revises Permit Attachment D, Table D-2, <i>Emergency Equipment Maintained at the Waste Isolation Pilot Plant</i>, and Permit Attachment E, Table E-1, <i>Inspection Schedule/Procedures</i>, to replace the two WIPP Fire Department (FD) fire trucks and the surface rescue truck with two new functionally equivalent fire trucks. This is accomplished by removing the Rescue Truck, "/Truck", from "Rescue Cart/Truck" Equipment line of Table D-2 and adding rescue capabilities to the "Description and Capabilities" for the "Fire Trucks" so that the "Description of Capabilities" for the "Fire Trucks" reads as follows; "A minimum of two fire trucks with rescue equipment to assist in fighting fires and emergency rescue; firefighter equipped in accordance with NFPA 1901 and/or 1906 and as documented in WIPP facility files."</p> <p>Since the rescue truck information is moved to "Fire Trucks", the "Rescue Cart/Truck" line is revised to include only the minimum number of rescue carts ("...minimum of one...") and to remove the location information pertinent to the Rescue Truck.</p> <p>Table E-1 is similarly revised by removing the Rescue Truck, "/Truck" from "System/Equipment Name" column from the "Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart/Truck)" line. No other changes are required to this line because the procedure listed covers the emergency equipment now in the fire trucks.</p>	B.6.b
2	<p>Attachment D, <i>RCRA Contingency Plan</i>, Section D-7 <i>Emergency Response Agreements</i></p> <p>Attachment D, <i>RCRA Contingency Plan</i>, Section D-9 <i>Location of the RCRA Contingency Plan and Plan Revision</i></p>	<p>This modification updates Permit Attachment D, Section D-7, <i>Emergency Response Agreements</i>, and Permit Attachment D, Section D-9, <i>Location of the RCRA Contingency Plan and Plan Revision</i>, with the following changes:</p> <ul style="list-style-type: none"> • Section D-7, <i>Emergency Response Agreements</i> <ul style="list-style-type: none"> ○ Changed "Lea Regional Medical Center" to "Covenant Health Hobbs Hospital" ○ Changed "the medical center" to "these facilities" • Section D-9, <i>Location of the RCRA Contingency Plan and Plan Revision</i> <ul style="list-style-type: none"> ○ Changed "Lea Regional Medical Center" to "Covenant Health Hobbs Hospital" ○ Added "Eddy County Fire and Rescue," "Eddy County 	B.6.d

Item No.	Affected Permit Section	Change Description	Category
		Emergency Management,” and “Lea County Emergency Management”	
3	Attachment F, <i>Facility Personnel Permit Training Program</i> , Section F-1a, <i>Facility Personnel Permit Training Program Design</i> Attachment F, <i>Facility Personnel Permit Training</i> , Section F-1b(3), <i>Training Techniques</i>	<p>This modification revises Permit Attachment F, Section F-1a, <i>Facility Personnel Permit Training Program Design</i>, and Permit Attachment F, Section F-1b(3), <i>Training Techniques</i>, to include the option of computer and web based training examinations.</p> <p>Permit Attachment F was modified as specified below:</p> <ul style="list-style-type: none"> • Revise Permit Attachment F, Section F-1a, <i>Facility Personnel Permit Training Program Design</i>, to clarify "written examinations" includes computer and web based training examinations. <ul style="list-style-type: none"> ○ Changed "...written or oral examinations..." to "...written (includes in person examinations, computer, and web based training examinations) or oral examinations...". • Revise Permit Attachment F, Section F-1b(3), <i>Training Techniques</i>, to clarify "written examinations" includes computer and web based training examinations. <ul style="list-style-type: none"> ○ Changed "Written examinations..." to "Written examinations (includes in person, computer, and web based training examinations)....". ○ Changed "If individuals fail a written examination, they must be reexamined in identified areas of weakness" to "If individuals fail an examination, in accordance with WIPP training procedures, they are disqualified from working unsupervised for the role or task associated with the failed training until the training course examination has been successfully completed." 	B.5.b
4	Attachment A4, <i>Traffic Patterns</i> , Section A4-2, <i>Facility Access and Traffic</i>	This modification updates Permit Attachment A4, Section A4-2, <i>Facility Access and Traffic</i> , to remove conflicting language regarding the completion of General Employee Training (GET) within 30 days.	A.1

Item No.	Affected Permit Section	Change Description	Category
		Permit Attachment A4 was modified as specified below: <ul style="list-style-type: none"> • Revise Permit Attachment A4, Section A4-2, <i>Facility Access and Traffic</i>, to remove “within 30 days of their employment.” 	

Item 1

Description

This modification revises Permit Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*, and Permit Attachment E, Table E-1, *Inspection Schedule/Procedures*, to replace the two WIPP Fire Department (FD) fire trucks and the surface rescue truck with two new functionally equivalent fire trucks. This is accomplished by removing the Rescue Truck, “/Truck”, from “Rescue Cart/Truck” Equipment line of Table D-2 and adding rescue capabilities to the “Description and Capabilities” for the “Fire Trucks” so that the “Description of Capabilities” for the “Fire Trucks” reads as follows; “A minimum of two fire trucks with rescue equipment to assist in fighting fires and emergency rescue; firefighter equipped in accordance with NFPA 1901 and/or 1906 and as documented in WIPP facility files.”

Since the rescue truck information is moved to “Fire Trucks”, the “Rescue Cart/Truck” line is revised to include only the minimum number of rescue carts (“...minimum of one...”) and to remove the location information pertinent to the Rescue Truck.

Table E-1 is similarly revised by removing the Rescue Truck, “/Truck” from “System/Equipment Name” column from the “Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart/Truck)” line. No other changes are required to this line because the procedure listed covers the emergency equipment now in the fire trucks.

Basis

Because there is no reduction in the Permittees’ capability to respond to emergencies, these changes are classified as “Replacement with functionally equivalent equipment, upgrade, or relocate emergency equipment listed” and is, therefore, a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, B.6.b).

Discussion

The Permittees have procured two new fire trucks. The two newly acquired fire trucks serve as direct replacements for the previous fire trucks. In addition, both of the new fire trucks have rescue capability, a capability previously assigned to a separate vehicle. Both of the new fire trucks are loaded with the same lifesaving rescue equipment that was stored on the surface rescue truck currently described in the Permit, giving each new fire truck the capabilities of the surface rescue truck, along with their original firefighting emergency response function. This change is needed in order to retire the two WIPP FD fire trucks and the surface rescue truck due to service life exceedances, reliability and performance issues, and costly routine maintenance.

The firefighting capabilities, safety features, and storage capacity of the two new fire trucks exceed that of the existing vehicles. The water storage capacities and the water pumping rate of the new fire trucks exceeds that of the existing fire trucks. With the increased storage capacity on each new fire truck, the rescue equipment stored on the previous rescue truck was transferred to one of the new fire trucks. Redundant rescue equipment was ordered and installed on the other newly acquired fire truck. By outfitting both fire trucks with rescue equipment that meet or exceed the previous rescue truck the Permittees exceed the combined emergency response capability of the three emergency vehicles.

With these changes, the descriptions of the two fire trucks in Table D-2 now include rescue equipment and rescue capabilities. With both the WIPP FD fire trucks serving as dual purpose firefighting and emergency rescue vehicles, a separate surface rescue vehicle is no longer needed. Therefore, the surface rescue truck was removed and replaced by the two new functionally equivalent fire trucks with rescue equipment and capabilities. Similarly, Table E-1 was revised to make the text consistent with these changes. These changes are needed to update the Permit to reflect the new fire truck equipment capabilities.

Proposed Revised Permit Text:

**Table D-2
Emergency Equipment Maintained at the Waste Isolation Pilot Plant**

Fire Detection and Fire Suppression Equipment		
Building Smoke, Thermal Detectors, or Manual Pull Stations	Devices that trigger an alarm and/or fire suppression system	Guard and Security Building (Building 458), Warehouse/Shops Building (Building 453), Support Building (Building 451, CMR/Computer Room), Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Underground Fuel Station (N150/W170), SH Shaft Hoisthouse (Building 384), Engineering Building (Building 486), Safety and Emergency Services Facility (Building 452), and Training Building (Building 489)
Fire Trucks	A minimum of two fire trucks <u>with rescue equipment</u> to assist in fighting fires <u>and emergency rescue</u> ; firefighter equipped in accordance with NFPA 1901 and/or 1906 and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)
Rescue Cart/Truck	A minimum of one minimum of two special purpose vehicles, one on the surface and one in the underground ; light rescue units, equipped in accordance with the NFPA 1901 and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay) and-Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Fire Suppression Cart	A minimum of one special-purpose electric cart to assist in fighting fires; equipped with a minimum of one fire extinguisher	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Fire Extinguishers	Hand-held fire extinguishers; located throughout the facility in accordance with NFPA-10	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files
Automatic Dry Chemical Extinguishing Systems	Automatic; actuated by thermal detectors or by manual pull stations	Underground fuel station (N150/W170)

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

Fire Pumps	Fire Protection Engineering	Weekly	WP 12-FP0026 Inspecting for Deterioration ^b , Leaks/Spills, fire water valve position(s), and panel light status
		Annually (Electric Pump)	WP 12-FP5113 Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed
		Annually (Diesel Pump)	WP 12-FP5114 Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed
Fire Sprinkler Systems	Fire Protection Engineering	Monthly/ quarterly/ annually	WP 12-FP0025, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration ^b , Leaks/Spills, water pressures, and main drain test
Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart/Truck)	Fire Department	Weekly	WP 12-FP0033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ
Forklifts Used for Waste Handling (Electric and Diesel forklifts, Push-Pull Attachment)	Waste Handling	Preoperational ^c	WP 05-WH1201, WP 05-WH1207, WP 05-WH1401, WP 05-WH1402, WP 05-WH1403, and WP 05-WH1412 Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , and On board fire suppression system
Automatic on-board fire suppression systems	Fire Protection Engineering	Monthly/Semi-annually	WP 12-FP0085 WP 12-FP0060 Inspecting for Mechanical Operability ^m and Deterioration ^b
Hazardous Material Response Equipment	Fire Department	Quarterly	WP 12-FP0033 Inspecting for Deterioration ^b , and Required Equipment ⁿ

Item 2

Description

This modification updates Permit Attachment D, Section D-7, *Emergency Response Agreements*, and Permit Attachment D, Section D-9, *Location of the RCRA Contingency Plan and Plan Revision*, with the following changes:

- Section D-7, *Emergency Response Agreements*
 - Changed “Lea Regional Medical Center” to “Covenant Health Hobbs Hospital”
 - Changed “the medical center” to “these facilities”
- Section D-9, *Location of the RCRA Contingency Plan and Plan Revision*
 - Changed “Lea Regional Medical Center” to “Covenant Health Hobbs Hospital”
 - Added “Eddy County Fire and Rescue,” “Eddy County Emergency Management,” and “Lea County Emergency Management”

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.6.d).

Discussion

Covenant Health acquired Lea Regional Medical Center which necessitated a new Memorandum of Understanding between the DOE Carlsbad Field Office (**CBFO**) and the Covenant Health Hobbs Hospital. This replaces the applicable emergency management coordination and support contained in the Memorandum of Understanding between the DOE CBFO and Lea Regional Medical Center dated August 12, 1999, addendum dated February 2, 2001.

Three additional agencies (Eddy County Fire and Rescue; Eddy County Emergency Management; and Lea County Emergency Management) were also added to the list of recipients for the *RCRA Contingency Plan*. Although these agencies are currently being provided with copies of the RCRA Contingency plan, they were added to ensure that they continue to receive the current copies of the RCRA Contingency Plan.

These changes are needed to update the Permit with current information.

Proposed Revised Permit Text:

D-7 Emergency Response Agreements

The Permittees have established agreements with federal, state, and local emergency response agencies and mining companies in the vicinity of the WIPP facility for firefighting, medical assistance, hazardous materials response, and law enforcement. In the event that on-site response resources are unable to provide the needed response actions during a medical, fire, hazardous materials, or security emergency, the RCRA Emergency Coordinator will notify appropriate response agencies and request assistance. Once on site, emergency response agency personnel will perform emergency response activities under the direction of the Incident Commander.

The agreements with federal, state, and local agencies and mining companies in the vicinity of the WIPP facility for emergency response capabilities are on file at the WIPP facility. Additional agreements may be established when needed. A description of the agreements with federal, state, and local agencies and mining operations in the vicinity of the WIPP facility, as required by 20.4.1.300 NMAC (incorporating 40 CFR §§262.256 and 262.261(c)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.37 and §264.52(c)), include, but is not limited to, the following:

- Agreements with local mining companies, including Intrepid Potash NM LLC, White Marble Mine, and Mosaic Potash Carlsbad Inc. provide for mutual aid and assistance, in the form of MRTs, in the event of a mine disaster or other circumstance at either of the facilities. This provision ensures that the WIPP MOC will have two MRTs available at all times when miners are underground.
- An agreement with the U.S. Department of Interior (**DOI**), represented by the Bureau of Land Management (**BLM**), Roswell District, for wildland firefighting support within the WIPP Land Withdrawal Area.
- Agreements for mutual-aid firefighting with Eddy County, the City of Hobbs, and the City of Carlsbad for assistance, including equipment and personnel.
- A mutual-aid Agreements with the City of Hobbs and the City of Carlsbad for mutual ambulance, medical, rescue, and hazardous material response services; for use of WIPP facility radio frequencies during emergencies; and for mutual security and law enforcement services, within the appropriate jurisdiction limits of each party.
- Agreements with the ~~Lea Regional Medical Center~~ Covenant Health Hobbs Hospital and the Carlsbad Medical Center for the treatment of persons with radiological contamination who have incurred injuries beyond the treatment capabilities at the WIPP site. The WIPP facility provides transport of the patient(s) to these facilities ~~the medical center~~.
- Agreements with the Sheriff of Eddy County and the Sheriff of Lea County for mutual law enforcement services support.

D-9 Location of the RCRA Contingency Plan and Plan Revision

In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §§262 and 262.262(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a)), the owner/operator of the WIPP facility will ensure that copies of this *RCRA Contingency Plan* are maintained at the WIPP facility and are available to the emergency personnel and organizations described in Section D-2. When the *RCRA Contingency Plan* is revised, updated copies are distributed (electronically or via site mail) or hand delivered to applicable WIPP facility emergency personnel and Emergency Operations Centers. In addition, the Permittees will make copies available to the following federal, state, and local agencies and mining companies in the vicinity of the WIPP facility, as required by 20.4.1.300 (incorporating 40 CFR §262.262(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.53(b)):

- Intrepid Potash New Mexico LLC
- White Marble Mine
- Mosaic Potash Carlsbad Inc.
- City of Carlsbad
- Carlsbad Medical Center, Carlsbad
- ~~Lea Regional Medical Center~~ Covenant Health Hobbs Hospital, Hobbs
- City of Hobbs
- BLM, Carlsbad
- New Mexico State Police
- New Mexico Department of Homeland Security and Emergency Management
- Eddy County Commission
- Sheriff of Eddy County
- Sheriff of Lea County
- Eddy County Fire and Rescue
- Eddy County Emergency Management
- Lea County Emergency Management

Item 3

Description

This modification revises Permit Attachment F, Section F-1a, *Facility Personnel Permit Training Program Design*, and Permit Attachment F, Section F-1b(3), *Training Techniques*, to include the option of computer and web based training examinations.

Permit Attachment F was modified as specified below:

- Revise Permit Attachment F, Section F-1a, *Facility Personnel Permit Training Program Design*, to clarify "written examinations" includes computer and web based training examinations.
 - Changed "...written or oral examinations..." to "...written (includes in person examinations, computer, and web based training examinations) or oral examinations...".
- Revise Permit Attachment F, Section F-1b(3), *Training Techniques*, to clarify "written examinations" includes computer and web based training examinations.
 - Changed "Written examinations..." to "Written examinations (includes in person, computer, and web based training examinations)....".
 - Changed "If individuals fail a written examination, they must be reexamined in identified areas of weakness" to "If individuals fail an examination, in accordance with WIPP training procedures, they are disqualified from working unsupervised for the role or task associated with the failed training until the training course examination has been successfully completed."

Basis

This change is classified as an "Other changes to the training plan" and is therefore a Class 1 Modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, B.5.b.).

Discussion

Although the Permit currently allows computer based training, it does not specify the option to complete examinations demonstrating training course competency via computer and web-based examinations. These changes are needed in order to revise Attachment F to clarify that exam completion online after finishing an online training course is acceptable. These changes are needed to allow the WIPP facility to benefit from the increased flexibility of online training and allows the individuals to choose the training time and pace. Additionally, this change ensures consistency with Section 4.b.(1)(c) of the DOE Order 426.2, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities which identifies written examinations to include computer and web based training examinations. The added capability of completing proficiency examinations online will also reduce Permit training lapses for online Permit training courses.

The WIPP facility is currently developing a computer based training course for initial General Employee Training. Computer and web based training examinations will provide the new

employees as well as WIPP facility visitors more flexibility to complete the training course and at their own pace.

These changes do not decrease the amount of training given to WIPP facility employees. These changes are needed in order to clarify the examination requirements in the Permit consistent with existing computer based training. Due to the COVID-19 pandemic, online training has become an essential part of the WIPP training program. This change is also needed in order for facility personnel to maintain their training while working remotely during the pandemic.

In addition, a change to Permit Attachment F, Section F-1b(3), has been made to clarify what actions are taken in the event of failed examinations. The change clarifies that if an individual fails an examination, the individual must have supervision in the role or task associated with the failed training until the examination has been successfully completed.

Proposed Revised Permit Text:

F-1a Facility Personnel Permit Training Program Design

Upon completion of the specific classroom, computer based training, eLearning or structured self-study technical training courses, trainees must successfully complete written (includes in person examinations, computer, and web based training examinations) or oral examinations to demonstrate competency.

F-1b(3) Training Techniques

Written examinations (includes in person examinations, computer, and web based training examinations) are used as a technique to test and document the knowledge level of individuals participating in classroom training courses. The length and content of each exam varies according to its objective. If individuals fail a written examination, in accordance with WIPP training procedures, they are disqualified from working unsupervised for the role or task associated with the failed training until the training course examination has been successfully completed they must be reexamined in identified areas of weakness.

Item 4

Description

This modification updates Permit Attachment A4, Section A4-2, *Facility Access and Traffic*, to remove conflicting language regarding the completion of General Employee Training (**GET**) within 30 days.

Permit Attachment A4 was modified as specified below:

- Revise Permit Attachment A4, Section A4-2, *Facility Access and Traffic*, to remove “within 30 days of their employment.”

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

In November of 2017, a Class 2 Permit Modification Request was approved which revised Attachment F, *Facility Personnel Permit Training Program*. This revision removed the original 30-day completion requirement for General Employee Training for all new WIPP employees to align with the regulatory requirements under 40 CFR §264.16(b). The requirement in Permit Attachment A4, Section A4-2, *Facility Access and Traffic*, to complete GET training within 30 days of employment does not align with current Permit Attachment F, *Facility Personnel Permit Training Program*, and is an artifact from Permit versions prior to November of 2017. Therefore, in order to preserve the current Permit’s accuracy and consistency, this language was removed from Permit Attachment A4, Section A4-2, *Facility Access and Traffic*.

This change is needed to make the Permit text accurate and internally consistent.

Proposed Revised Permit Text:

A4-2 Facility Access and Traffic

The site speed limit for motor vehicles is 10 mph (16 kph) and 5 mph (8 kph) for rail movements. Speed limits are clearly posted at the entrance to the site and enforced by security officers. There are no traffic signals. Stop signs are located at the major intersections of roadways with the main east-west road. Safety requirements are communicated to all site personnel via General Employee Training ~~within 30 days of their employment~~. Employee access to on-site facilities requires an annual refresher course to reinforce the safety requirements. Security officers monitor vehicular traffic for compliance with site restrictions, and provide instructions to off-site delivery shipments. Vehicular traffic other than the waste transporters use the same roads, but there will be no interference because there are two lanes available on the primary and alternate routes for waste shipments. Pedestrian traffic is limited to the sidewalks and prominently marked crosswalks. Site traffic is composed mostly of pickup trucks and electric carts with a frequency of perhaps 10 per hour at peak periods. Emergency vehicles are exercised periodically for maintenance and personnel training, with an average frequency of one each per day. They are used for their intended purpose on an as-required basis.