



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
January 31, 2022

Mr. Rick Shean, 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, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Shean:

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

- Update Underground Escape and Evacuation Map in Permit Attachment D
- Adding Two Procedures to Permit Attachment E, Table E-1 for the Fire Sprinkler Systems
- Correction to a Regulatory Citation in Permit Attachment F, Table F-1
- Update to Part A Forms in Permit Attachment B
- Update to Permit Attachment A
- Update to Permit Attachment L
- Update to Permit Attachment B, Appendix B1
- Clarify Annual GET Refresher Training in Permit Attachment F, Section F-1b(1)

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. Martin P. Navarrete at (575) 706-0068.

Sincerely,

REINHARD KNERR Digitally signed by REINHARD KNERR  
Date: 2022.01.31 15:57:18 -07'00'

Reinhard Knerr  
Manager  
Carlsbad Field Office

SEAN DUNAGAN Digitally signed by SEAN DUNAGAN (Affiliate)  
Date: 2022.01.31 09:28:45 -07'00'  
(Affiliate)

Sean Dunagan  
President and Project Manager  
Nuclear Waste Partnership LLC

Enclosure

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

### **Class 1 Permit Modification Notifications**

- 1. Update Underground Escape and Evacuation Map in Permit Attachment D**
- 2. Adding Two Procedures to Permit Attachment E, Table E-1 for the Fire Sprinkler Systems**
- 3. Correction to a Regulatory Citation in Permit Attachment F, Table F-1**
- 4. Update to Part A Forms in Permit Attachment B**
- 5. Update to Permit Attachment A**
- 6. Update to Permit Attachment L**
- 7. Update to Permit Attachment B, Appendix B1**
- 8. Clarify Annual GET Refresher Training in Permit Attachment F, Section F-1b(1)**

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

**WIPP Permit Number - NM4890139088-TSDF**

**January 2022**

## Table of Contents

Transmittal Letter	
Table of Contents.....	i
Acronyms and Abbreviations .....	iii
Overview of the Permit Modification Notifications .....	1
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-5
Description .....	A-5
Basis .....	A-5
Discussion.....	A-5
Proposed Revised Permit Text: .....	A-6
Item 2 .....	A-8
Description .....	A-8
Basis .....	A-8
Discussion.....	A-8
Proposed Revised Permit Text: .....	A-9
Item 3 .....	A-10
Description .....	A-10
Basis .....	A-10
Discussion.....	A-10
Proposed Revised Permit Text: .....	A-11
Item 4 .....	A-12
Description .....	A-12
Basis .....	A-12
Discussion.....	A-12
Proposed Revised Permit Text: .....	A-14
Item 5 .....	A-23
Description .....	A-23
Basis .....	A-23
Discussion.....	A-23
Proposed Revised Permit Text: .....	A-24
Item 6 .....	A-25
Description .....	A-25
Basis .....	A-25
Discussion.....	A-25
Proposed Revised Permit Text: .....	A-26
Item 7 .....	A-31
Description .....	A-31
Basis .....	A-31
Discussion.....	A-31
Proposed Revised Permit Text: .....	A-38
Item 8 .....	A-48

Description ..... A-48  
Basis ..... A-48  
Discussion ..... A-48  
Proposed Revised Permit Text: ..... A-49

## Acronyms and Abbreviations

CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
EPA	Environmental Protection Agency
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
PMNs	Permit Modification Notifications
RCRA	Resource Conservation and Recovery Act
TSDf	treatment, storage, and disposal facility
WIPP	Waste Isolation Pilot Plant

## Overview of the Permit Modification Notifications

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

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

The requested modifications to the Permit and any related supporting documents are provided in these PMNs. The proposed 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	Attachment D, Figure D-4 <i>Underground Escape and Evacuation Map</i>	This modification revises Permit Attachment D, Figure D-4, <i>Underground Escape and Evacuation Map</i> , with the current Underground Escape and Evacuation Map from electronic attachment, EA12ER.25-1-0, <i>Underground Escape and Evacuation Map and Instructions</i> , to the WIPP Underground Escape and Evacuation Plan. The updates to the figure include the Panel 8 mining status and depicts recent Panel 7 waste emplacement information.	A.1
2	Attachment E, Table E-1, <i>Inspection Schedule/Procedures</i>	This modification revises Permit Attachment E, Table E-1, <i>Inspection Schedule/Procedures</i> , by separating the inspection requirement for monthly, quarterly, and annual inspections into three separate procedures for the fire sprinkler systems. Additionally, the inspection procedures for WP 12-FP0063 and WP 12-FP0064 were identified by inspection frequency.	A.1
3	Attachment F, Table F-1, <i>TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions</i>	This modification revises Permit Attachment F, Table F-1, <i>TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions</i> , to correct the citation for the RCRA Training Director Position Description with the following change: <ul style="list-style-type: none"> <li>• Changed "40 CFR §264.16(a)(3))" to "40 CFR §264.16(a)(2))" in the Position Description column for the RCRA Training Director.</li> </ul>	A.2
4	Permit Attachment B, <i>Hazardous Waste Permit Application Part A</i>	This modification updates the RCRA Subtitle C Site Identification Form and the Hazardous Waste Permit Part A Form (OMB# 2050-0024) in Permit Attachment B with the new forms published by the Environmental Protection Agency (EPA). Only the following changes to the information reported in the forms currently in the Permit are being made: <ul style="list-style-type: none"> <li>• RCRA Subtitle C Site Identification Form <ul style="list-style-type: none"> <li>○ Section 4, Site Location Address <ul style="list-style-type: none"> <li>▪ Changed Street Address from "30 miles east of Carlsbad on Jal Highway" to "34 Louis Whitlock Road."</li> <li>▪ Changed Zip Code from "88221" to "88220."</li> <li>▪ Added the Latitude "32.3697706" and Longitude "-103.7913501" as this</li> </ul> </li> </ul> </li> </ul>	A.1



Item No.	Affected Permit Section	Change Description	Category
		<p>information was added in the new revision of the forms.</p> <ul style="list-style-type: none"> <li>• Hazardous Waste Permit Part A Form <ul style="list-style-type: none"> <li>○ Section 5, Nature of Business <ul style="list-style-type: none"> <li>▪ The text was modified with the following change: <p>“The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility <u>for the receipt</u> <del>which entails receiving, unloading, and transferring of transuranic</del> <u>radioactive</u> mixed waste from the surface of the site to the underground hazardous waste <u>disposal</u> <del>management</del> units. Waste is emplaced in an underground geologic repository horizon located in a <u>deep, bedded</u> <del>deep bedded</del> salt formation approximately 2,150 feet beneath the surface.”</p> </li> </ul> </li> </ul> </li> <li>• RCRA Part A Application Certification <ul style="list-style-type: none"> <li>○ Updated the date to “1/31/2022.”</li> </ul> </li> </ul>	
5	Attachment A, Section A-1 <i>Facility Description</i>	<p>This modification revises Permit Attachment A, Section A-1, <i>Facility Description</i>, to update the Facility Location and Geographic Location with the following changes:</p> <ul style="list-style-type: none"> <li>• Changed Facility Location to “34 Louis Whitlock Road, Carlsbad, NM 88220.”</li> <li>• Changed Geographic Location to “32.3697706” and “-103.7913501.”</li> <li>• Added “(WGS84)” below Geographic Location.</li> </ul>	A.1
6	Attachment L, List of Tables Attachment L, Table L-4, <i>List of Culebra Wells in the WLMP, Current as of January 2020</i> Attachment L, Figure L-14, <i>Groundwater Level Surveillance Wells (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)</i>	<p>This modification revises Permit Attachment L, List of Tables, Permit Attachment L, Table L-4, <i>List of Culebra Wells in the WLMP, Current as of January 2020</i>, and Permit Attachment L, Figure L-14, <i>Groundwater Level Surveillance Wells (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)</i>, with the most current information as of January 2022:</p> <ul style="list-style-type: none"> <li>• Attachment L, List of Tables <ul style="list-style-type: none"> <li>○ Changed the title of Table L-4 to “<i>List of Culebra Wells in the</i>”</li> </ul> </li> </ul>	A.1

Item No.	Affected Permit Section	Change Description	Category
		<p><i>WLMP, Current as of January 2022.</i></p> <ul style="list-style-type: none"> <li>• Attachment L, Table L-4 <ul style="list-style-type: none"> <li>○ Changed the title of Table L-4 to <i>"List of Culebra Wells in the WLMP, Current as of January 2022."</i></li> <li>○ Changed "H-5b" to "H-5bR."</li> <li>○ Changed "WIPP-11" to "WIPP-11R."</li> </ul> </li> <li>• Attachment L, Figure L-14 <ul style="list-style-type: none"> <li>○ Changed "H-5b" to "H-5bR."</li> <li>○ Changed "WIPP-11" to WIPP-11R."</li> </ul> </li> </ul>	
7	Attachment B, Appendix B1, <i>Other Environmental Permits, Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of August 2019</i>	<p>This modification revises Permit Attachment B, Appendix B1, <i>Other Environmental Permits, Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of August 2019</i>, to remove information/lines from this table associated with inactive Permits, plugged and abandoned wells, and to provide updated information where needed. The lines being removed fall under the following categories:</p> <ol style="list-style-type: none"> <li>1. Currently listed as "Active" permits in the "Current Permit Status" column that are no longer active and will not be renewed.</li> <li>2. "P&amp;A" plugged and abandoned wells.</li> <li>3. Currently listed as "Inactive" permits in the "Current Permit Status" column that were not renewed.</li> </ol> <p>The specific changes being made can be found in the Table of Changes in the Discussion section below.</p>	A.1
8	Attachment F, Section F-1b(1), <i>Training Content</i>	<p>This modification revises Attachment F, Section F-1b(1), <i>Training Content</i> with the following changes:</p> <ul style="list-style-type: none"> <li>• Revised "an" to "the."</li> <li>• Added "GET" prior to "refresher."</li> </ul>	A.1

## Item 1

### Description

This modification revises Permit Attachment D, Figure D-4, *Underground Escape and Evacuation Map*, with the current Underground Escape and Evacuation Map from electronic attachment, EA12ER.25-1-0, *Underground Escape and Evacuation Map and Instructions*, to the WIPP Underground Escape and Evacuation Plan. The updates to the figure include the Panel 8 mining status and depicts recent Panel 7 waste emplacement information.

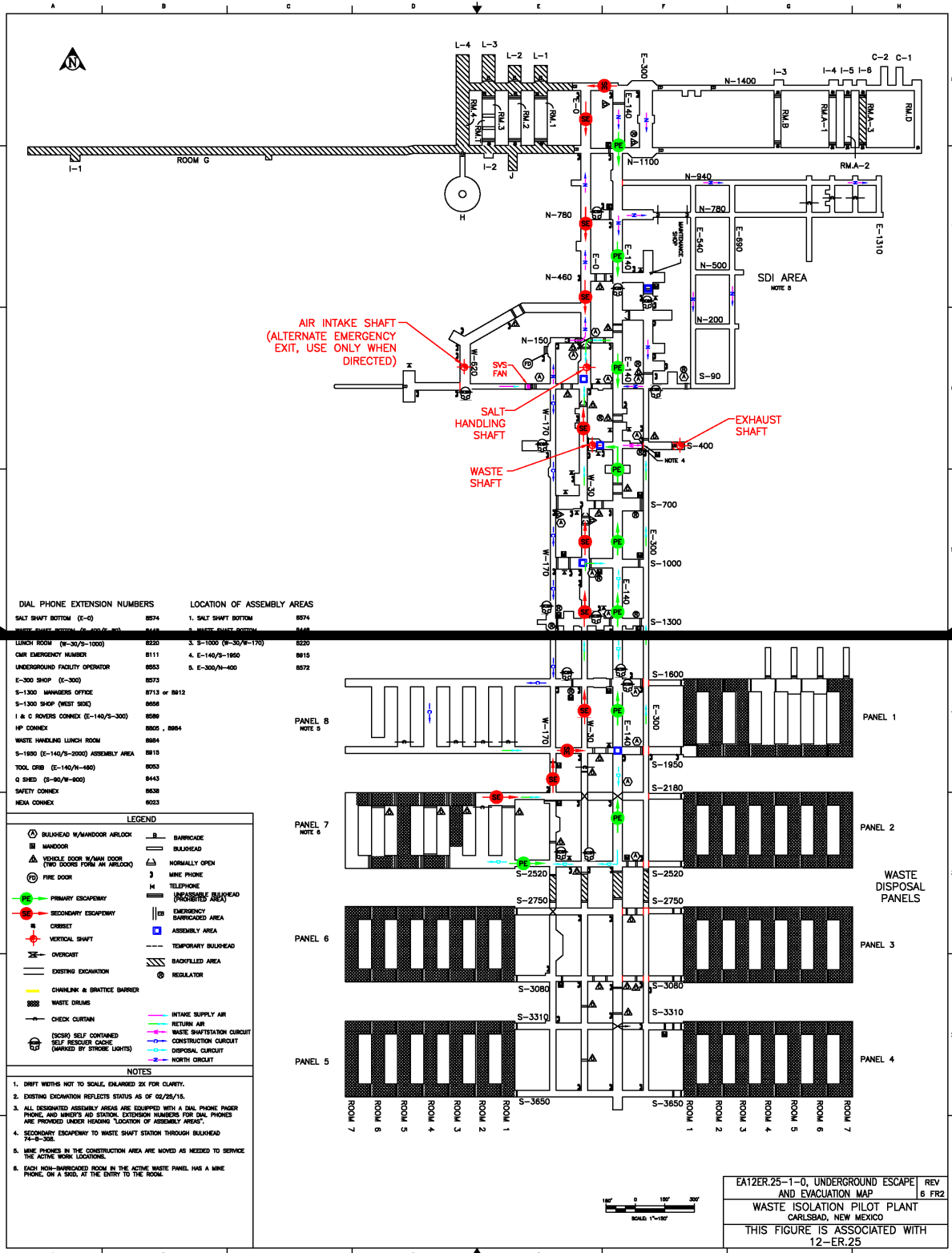
### Basis

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

### Discussion

These changes are needed to ensure that Figure D-4 is consistent with the Underground Escape and Evacuation Map referenced in the *Underground Escape and Evacuation Map and Instructions*. The Underground Escape and Evacuation Map has been recently updated to reflect updates to Panel 8 mining (showing that Panel 8 mining is complete) and Panel 7 waste emplacement status.

# Proposed Revised Permit Text:



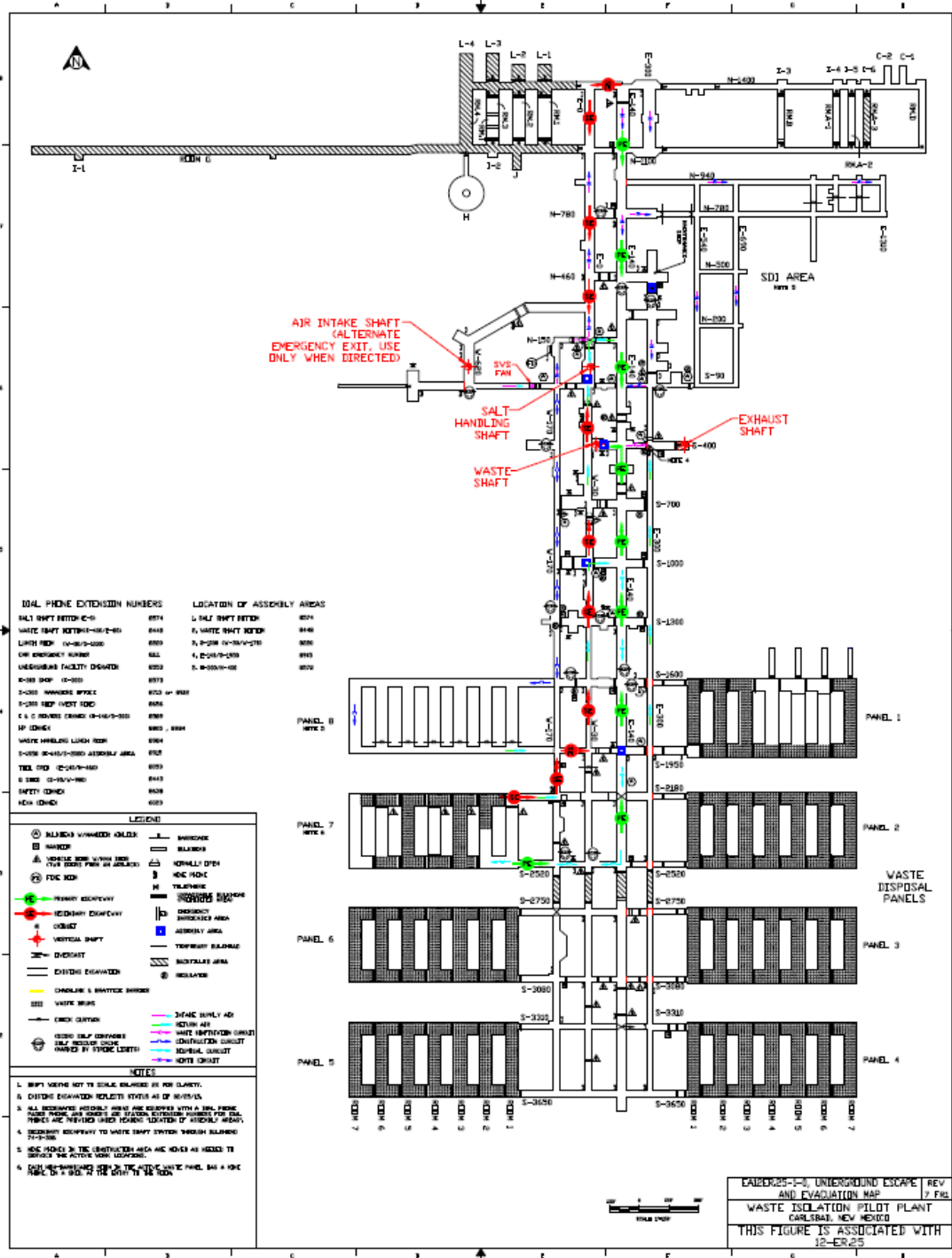


Figure D-4  
Underground Escape and Evacuation Map

## Item 2

### Description

This modification revises Permit Attachment E, Table E-1, *Inspection Schedule/Procedures*, by separating the inspection requirement for monthly, quarterly, and annual inspections into three separate procedures for the fire sprinkler systems. Additionally, the inspection procedures for WP 12-FP0063 and WP 12-FP0064 were identified by inspection frequency.

### Basis

These changes are classified as “Administrative and informational changes” and are, therefore, Class 1 modifications pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.1).

### Discussion

This change is needed to reflect the current procedures for the monthly, quarterly, and annual inspection of the fire sprinkler systems in Table E-1. The monthly and quarterly inspections of the fire sprinkler systems were separated from the original procedure WP 12-FP0025 *Sprinkler System Inspection and Testing* into separate procedures WP 12-FP0023 *Monthly Sprinkler System Inspection and Testing* and WP 12-FP0024 *Quarterly Sprinkler System Inspection and Testing*. The original procedure was renamed as WP 12-FP0025 *Annual Sprinkler System Inspection and Testing*.

Similar to other line items in Table E-1, the inspection criteria were duplicated for each of the inspection frequencies. Additionally, the inspection procedures for Room 108 and the CH Bay (WP 12-FP0063 *Sprinkler System Inspection and Testing – CH Bay and TMF* and WP 12-FP0064 *Sprinkler System Inspection and Testing – Room 108*) were identified in each inspection frequency.

The content and frequency for the fire sprinkler system inspection has not changed. This is an administrative change to incorporate these new procedures into Permit Attachment E, Table E-1, *Inspection Schedule/Procedures* and to separate these inspections by their frequency.

**Proposed Revised Permit Text:**

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

<b>System/Equipment Name</b>	<b>Responsible Organization</b>	<b>Inspection<sup>a</sup> Frequency</b>	<b>Procedure Number and Inspection Criteria<sup>h</sup></b>
Fire Pumps	Fire Protection Engineering	Weekly	WP 12-FP0026 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, fire water valve position(s), and panel light status
		Annually (Electric Pump)	WP 12-FP5113 Inspecting for Deterioration <sup>b</sup> , operability, flow, discharge pressure, suction pressure, and pump speed
		Annually (Diesel Pump)	WP 12-FP5114 Inspecting for Deterioration <sup>b</sup> , operability, flow, discharge pressure, suction pressure, and pump speed
Fire Sprinkler Systems	Fire Protection Engineering	Monthly <sup>f</sup>	WP 12-FP0023 <del>5</del> , WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, water pressures, and main drain test
		<del>q</del> Quarterly <sup>f</sup>	<u>WP 12-FP0024, WP 12-FP0063, and WP 12-FP0064</u> <u>Inspecting for Deterioration<sup>b</sup>, Leaks/Spills, water pressures, and main drain test</u>
		<del>a</del> Annually	<u>WP 12-FP0025, WP 12-FP0063, and WP 12-FP0064</u> <u>Inspecting for Deterioration<sup>b</sup>, Leaks/Spills, water pressures, and main drain test</u>
Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart/Truck)	Fire Department	Weekly	WP 12-FP0033 Inspecting for Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , Leaks/Spills, and Required Equipment <sup>n</sup>

### Item 3

#### Description

This modification revises Permit Attachment F, Table F-1, *TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions*, to correct the citation for the Resource Conservation and Recovery Act (**RCRA**) Training Director Position Description with the following change:

- Changed “40 CFR §264.16(a)(3)” to “40 CFR §264.16(a)(2)” in the Position Description column for the RCRA Training Director.

#### Basis

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

#### Discussion

This change is needed to ensure the correct citation is listed in Table F-1.



**Proposed Revised Permit Text:**

<b>JOB TITLE</b>	<b>POSITION DESCRIPTION</b>
Inspector	<p>Responsible for routine inspection and maintenance (including repairing and replacement, as appropriate) of equipment instrumental in preventing, detecting, or responding to environmental or human health hazards, such as monitoring equipment, safety and emergency equipment, and operating or structural equipment. Inspections are performed at the facility to detect malfunctions, deterioration, operator errors, and discharges that may cause or lead to releases of TRU mixed waste or TRU mixed waste constituents to the environment or that could be a threat to human health. Depending on the Inspector's specific job position, job duties may involve one or more of the following:</p> <ul style="list-style-type: none"> <li>• Performing functional and operational checks of waste handling equipment and support systems as well as conducting waste container storage inspections</li> <li>• Conducting routine inspections of emergency response equipment and vehicles, on site</li> <li>• Performing routine inspections of the hoisting equipment for the Air Intake Shaft, Salt Handling Shaft, and Waste Shaft</li> <li>• Conducting routine inspections and testing of facility fire suppression and detection systems</li> <li>• Inspecting and testing of communication systems, site notification system, the public address system, and alarm systems for proper function</li> <li>• Performing routine inspections of the backup power supply diesel generators</li> <li>• Performing routine inspections of the eye wash and shower equipment</li> <li>• Performing routine inspections of the underground geomechanical instrumentation system</li> <li>• Performing routine inspections of the central uninterruptible power supply</li> <li>• Performing routine inspections of the fire water storage tank</li> <li>• Performing routine inspections of the ventilation exhaust fans</li> </ul>
RCRA Training Director	<p>Responsible for directing the hazardous waste management training at the WIPP facility. To meet the 20.4.1.500 NMAC (incorporating 40 CFR §264.16(a)(2<del>3</del>)) requirements, the RCRA Training Director must be a person trained in hazardous waste management procedures.</p>

## Item 4

### Description

This modification updates the RCRA Subtitle C Site Identification Form and the Hazardous Waste Permit Part A Form (OMB# 2050-0024) in Permit Attachment B with the new forms published by the Environmental Protection Agency (**EPA**). Only the following changes to the information reported in the forms currently in the Permit are being made:

- RCRA Subtitle C Site Identification Form
  - Section 4, Site Location Address
    - Changed Street Address from “30 miles east of Carlsbad on Jal Highway” to “34 Louis Whitlock Road.”
    - Changed Zip Code from “88221” to “88220.”
    - Added the Latitude “32.3697706” and Longitude “-103.7913501” as this information was added in the new revision of the forms.
  - Section 5, Nature of Business
    - The text was modified with the following change:  
“The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility for the receipt ~~which entails receiving,~~ unloading, and transferring of transuranic ~~radioactive~~ mixed waste from the surface of the site to the underground hazardous waste disposal ~~management~~ units. Waste is emplaced in an underground geologic repository horizon located in a deep, bedded ~~deep bedded~~ salt formation approximately 2,150 feet beneath the surface.”
- Hazardous Waste Permit Part A Form
  - Section 5, Nature of Business
    - The text was modified with the following change:  
“The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility for the receipt ~~which entails receiving,~~ unloading, and transferring of transuranic ~~radioactive~~ mixed waste from the surface of the site to the underground hazardous waste disposal ~~management~~ units. Waste is emplaced in an underground geologic repository horizon located in a deep, bedded ~~deep bedded~~ salt formation approximately 2,150 feet beneath the surface.”
- RCRA Part A Application Certification
  - Updated the date to “1/31/2022.”

### Basis

This change is classified as an “Administrative and informational change” 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 the RCRA Subtitle C Site Identification Form and the Hazardous Waste Permit Part A Form (OMB# 2050-0024) in Permit Attachment B, which shows an expiration date of May 31, 2020, with the current form which expires on April 30, 2024. This change is needed to update the current RCRA Subtitle C Site Identification Form and the Hazardous Waste Permit Part A Form (OMB# 2050-0024) in Permit Attachment B, with the current forms. The changes to Section 4, Site Location Address, of the RCRA Subtitle C Site Identification Form are discussed below.

- Changed Street Address from “30 miles east of Carlsbad on Jal Highway” to “34 Louis Whitlock Road.” Section 4 of the RCRA Subtitle C Site Identification Form requires the specific facility address and not a facility location (*i.e.*, not “30 miles east of Carlsbad on

Jal Highway).” Therefore, this change to the specific facility address is needed to comply with the requirements of Section 4 of the RCRA Subtitle C Site Identification Form for this entry.

- Changed the Zip Code from “88221” to “88220.” This change is needed to make the zip code consistent with the change to the street address.
- Added the Latitude “32.3697706” and Longitude “-103.7913501” as this information was added by EPA as a new requirement in the revised Section 4 of the RCRA Subtitle C Site Identification Form. Therefore, this change is needed to comply with the requirements of Section 4 of the RCRA Subtitle C Site Identification Form.

The text change in the Hazardous Waste Permit Part A Form, Section 5, Nature of Business is editorial in order to provide a more accurate description. Since the Permittees are resigning the Part A form, the date on the RCRA Part A Application Certification is being updated.

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

**Proposed Revised Permit Text:**

OMB# 2050-0024; Expires 04/30/2024

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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**1. Reason for Submittal** (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, $> 1$ kg of acute hazardous waste, or $> 100$ kg of acute hazardous waste spill cleanup in <b>one or more months of the reporting year</b> (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A (permit) Form

**2. Site EPA ID Number**

N	M	4	8	9	0	1	3	9	0	8	8
---	---	---	---	---	---	---	---	---	---	---	---

**3. Site Name**

Waste Isolation Pilot Plant
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**4. Site Location Address**

Street Address	34 Louis Whitlock Road		
City, Town, or Village	Carlsbad	County	Eddy
State	NM	Country	USA
		Zip Code	88220
Latitude	32.3697706	Longitude	-103.7913501
		<input type="checkbox"/> Use Lat/Long as Primary Address	

**5. Site Mailing Address**

Same as Location Street Address

Street Address	P.O. Box 3090		
City, Town, or Village	Carlsbad	Country	USA
State	NM	Zip Code	88221

**6. Site Land Type**

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input checked="" type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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**7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)**

A. (Primary)	56221	C.	
B.		D.	

EPA ID Number

N M 4 8 9 0 1 3 9 0 8 8

OMB# 2050-0024; Expires 04/30/2024

**8. Site Contact Information** Same as Location Address

First Name	<b>Reinhard</b>	MI	Last Name	<b>Knerr</b>	
Title	<b>Manager, Carlsbad Field Office (CBFO)</b>				
Street Address	<b>P.O. Box 3090</b>				
City, Town, or Village	<b>Carlsbad</b>				
State	<b>NM</b>	Country	<b>USA</b>	Zip Code	<b>88221</b>
Email	<b>Reinhard.Knerr@cbfo.doe.gov</b>				
Phone	<b>(575) 234-7300</b>	Ext		Fax	<b>(575) 234-7694</b>

**9. Legal Owner and Operator of the Site****A. Name of Site's Legal Owner** Same as Location Address

Full Name	<b>U.S. Department of Energy</b>		Date Became Owner (mm/dd/yyyy)	<b>5/18/1981</b>	
Owner Type	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				
Street Address	<b>P.O. Box 3090</b>				
City, Town, or Village	<b>Carlsbad</b>				
State	<b>NM</b>	Country	<b>USA</b>	Zip Code	<b>88221</b>
Email	<b>Reinhard.Knerr@cbfo.doe.gov</b>				
Phone	<b>(575) 234-7300</b>	Ext		Fax	<b>(575) 234-7694</b>
Comments					

**B. Name of Site's Legal Operator** Same as Location Address

Full Name	<b>U.S. Department of Energy</b>		Date Became Operator (mm/dd/yyyy)	<b>5/18/1981</b>	
Operator Type	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				
Street Address	<b>P.O. Box 3090</b>				
City, Town, or Village	<b>Carlsbad</b>				
State	<b>NM</b>	Country	<b>USA</b>	Zip Code	<b>88221</b>
Email	<b>Reinhard.Knerr@cbfo.doe.gov</b>				
Phone	<b>(575) 234-7300</b>	Ext		Fax	<b>(575) 234-7694</b>
Comments	<b>See Item 18, Comments, for additional operator.</b>				

**10. Type of Regulated Waste Activity (at your site)**

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities**

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
<input checked="" type="checkbox"/>	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Recycler of Hazardous Waste	
<input type="checkbox"/>	a. Recycler who stores prior to recycling	
<input type="checkbox"/>	b. Recycler who does not store prior to recycling	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption	
<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption	

**B. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

D004	D009	D021	D029	D035	D040	F004
D005	D010	D022	D030	D036	D043	F005
D006	D011	D026	D032	D037	F001	F006
D007	D018	D027	D033	D038	F002	F007
D008	D019	D028	D034	D039	F003	See Item 18

**C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes.** Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.


**11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)****A. Other Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

**B. Universal Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input type="checkbox"/>	c. Mercury containing equipment
<input type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Aerosol Cans
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

**D. Pharmaceutical Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

**12. Eligible Academic Entities with Laboratories**—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262, Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

**13. Episodic Generation**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
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**14. LQG Consolidation of VSQG Hazardous Waste**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.
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**15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
<input type="checkbox"/>	A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility
	B. Expected closure date: _____ mm/dd/yyyy
	C. Requesting new closure date: _____ mm/dd/yyyy
	D. Date closed : _____ mm/dd/yyyy
<input type="checkbox"/>	1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
<input type="checkbox"/>	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)



**16. Notification of Hazardous Secondary Material (HSM) Activity**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
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**17. Electronic Manifest Broker**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
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**18. Comments** (include item number for each comment)

<b>Section 9.B (continued):</b> <b>Full Name: Nuclear Waste Partnership LLC</b> <b>Date Became Operator (mm/dd/yyyy): 10/01/2012</b> <b>Operator Type: Private</b> <b>Street Address: P.O. Box 2078</b> <b>City, Town, or Village: Carlsbad</b> <b>State: NM</b> <b>Country: USA</b> <b>Zip Code: 88221</b> <b>Email: Sean.Dunagan@wipp.ws</b> <b>Phone: (575) 234-7400</b> <b>Ext:</b> <b>Fax: (575) 234-7046</b>		
<b>Section 10.B (continued): F009, P015, P030, P098, P099, P106, P120, U002, U003, U019, U037, U043, U044, U052, U070, U072, U078, U079, U103, U105, U108, U122, U133, U134, U151, U154, U159, U196, U209, U210, U220, U226, U228, U239</b>		

**19. Certification** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my 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 my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative <b>Original Signature on File</b>	Date (mm/dd/yyyy) <b>1/31/2022</b>
Printed Name (First, Middle Initial Last) <b>Reinhard Knerr</b>	Title <b>Manager, Carlsbad Field Office (CBFO)</b>
Email <b>Reinhard.Knerr@cbfo.doe.gov</b>	

Signature of legal owner, operator or authorized representative <b>Original Signature on File</b>	Date (mm/dd/yyyy) <b>1/31/2022</b>
Printed Name (First, Middle Initial Last) <b>Sean Dunagan</b>	Title <b>Project Manager, Nuclear Waste Partnership LLC</b>
Email <b>Sean.Dunagan@wipp.ws</b>	

United States Environmental Protection Agency <b>HAZARDOUS WASTE PERMIT PART A FORM</b>	
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**1. Facility Permit Contact**

First Name	<b>Same as Site Contact</b>	MI	Last Name
Title			
Email			
Phone	Ext	Fax	

**2. Facility Permit Contact Mailing Address**

Street Address		
<b>Same as Site Mailing Address</b>		
City, Town, or Village		
State	Country	Zip Code

**3. Facility Existence Date (mm/dd/yyyy)**

5/18/1981
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**4. Other Environmental Permits**

A. Permit Type	B. Permit Number	C. Description
		<b>See Permit Attachment B, Appendix B1</b>

**5. Nature of Business**

**The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility for the receipt, unloading, and transfer of transuranic mixed waste from the surface of the site to the underground hazardous waste disposal units. Waste is emplaced in an underground geologic repository horizon located in a deep, bedded salt formation approximately 2,150 feet beneath the surface.**

**6. Process Codes and Design Capacities**

Line Number	A. Process Code				B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0 1	X	0	4	18000.00	C	002	Panels 1 and 2	
0 2	X	0	4	18750.00	C	001	Panel 3	
0 3	X	0	4	19106.00	C	001	Panel 4	
0 4	X	0	4	19195.00	C	001	Panel 5	
							See attached	

**7. Description of Hazardous Wastes** (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
							(1) Process Codes					(2) Process Description (if code is not entered in 7.D1)				
0 1	D	0	0	4	903	M	X	0	4	S	0	1	S	0	1	
0 2	D	0	0	5	484	M	X	0	4	S	0	1	S	0	1	
0 3	D	0	0	6	1819	M	X	0	4	S	0	1	S	0	1	
0 4	D	0	0	7	1248	M	X	0	4	S	0	1	S	0	1	
0 5	D	0	0	8	3246	M	X	0	4	S	0	1	S	0	1	
0 6	D	0	0	9	1727	M	X	0	4	S	0	1	S	0	1	
0 7	D	0	1	0	186	M	X	0	4	S	0	1	S	0	1	
0 8	D	0	1	1	1090	M	X	0	4	S	0	1	S	0	1	
0 9	D	0	1	8	749	M	X	0	4	S	0	1	S	0	1	
1 0	D	0	1	9	761	M	X	0	4	S	0	1	S	0	1	
																See attached

**8. Map**

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

**9. Facility Drawing**

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

**10. Photographs**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

**11. Comments**

**See Hazardous Waste Permit Part A Form, Narrative to Item 6. Process Codes and Design Capacities.**

### RCRA PART A APPLICATION CERTIFICATION

The U.S. Department of Energy (DOE), through its Carlsbad Field Office, has signed as “owner and operator,” and Nuclear Waste Partnership LLC, the Management and Operating Contractor (MOC), has signed this application for the permitted facility as “co-operator.”

The DOE has determined that dual signatures best reflect the actual apportionment of Resource Conservation and Recovery Act (RCRA) responsibilities as follows:

The DOE’s RCRA responsibilities are for policy, programmatic directives, funding and scheduling decisions, Waste Isolation Pilot Plant (WIPP) requirements of DOE generator sites, auditing, and oversight of all other parties engaged in work at the WIPP, as well as general oversight.

The MOC’s RCRA responsibilities are for certain day-to-day operations (in accordance with general directions given by the DOE and in the Management and Operating Contract as part of its general oversight responsibility), including, but not limited to, the following: certain waste handling, monitoring, record keeping, certain data collection, reporting, technical advice, and contingency planning.

For purposes of the certification required by Title 20 of the New Mexico Administrative Code, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, §270.11(d), the DOE’s and the MOC’s representatives certify, under penalty of law that this document and all attachments were prepared under their direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on their 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 their knowledge and belief, true, accurate, and complete for their respective areas of responsibility. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner and Operator Signature: Original signed by Reinhard Knerr  
Title: Manager, Carlsbad Field Office (CBFO)  
for: U.S. Department of Energy  
Date: 1/31/2022~~7/23/2020~~

Co-Operator Signature: Original signed by Sean Dunagan  
Title: Project Manager  
for: Nuclear Waste Partnership LLC  
Date: 1/31/2022~~7/23/2020~~

## Item 5

### Description

This modification revises Permit Attachment A, Section A-1, *Facility Description*, to update the Facility Location and Geographic Location with the following changes:

- Changed Facility Location to “34 Louis Whitlock Road, Carlsbad, NM 88220.”
- Changed Geographic Location to “32.3697706” and “-103.7913501.”
- Added “(WGS84)” below Geographic Location.

### Basis

This change is classified as an “Administrative and informational change” 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 ensure the accuracy of the Facility Location and Geographic Location in the Permit. This information is consistent with the information in the RCRA Subtitle C Site Identification Form in Permit Attachment B described in item 4 of this Permit Modification Notification. The change to update the facility location is being made to correspond with the physical address. The change to geographic location is to delineate the center of the WIPP Land Withdrawal Area. The geographic coordinate system (WGS84) that the coordinates are based on was also added.

Proposed Revised Permit Text:

**ATTACHMENT A**  
**GENERAL FACILITY DESCRIPTION AND**  
**PROCESS INFORMATION**

A-1 Facility Description

**Abstract**

NAME OF FACILITY:	Waste Isolation Pilot Plant
OWNER and CO-OPERATOR:	U.S. Department of Energy P.O. Box 3090 Carlsbad, NM 88221
CO-OPERATOR:	Nuclear Waste Partnership LLC P.O. Box 2078 Carlsbad, NM 88221
RESPONSIBLE OFFICIALS:	Reinhard Knerr Manager, DOE/Carlsbad Field Office Sean Dunagan Project Manager, Nuclear Waste Partnership LLC
FACILITY MAILING ADDRESS:	U.S. Department of Energy P.O. Box 3090 Carlsbad, NM 88221
FACILITY LOCATION:	<u>34 Louis Whitlock Road, Carlsbad, NM 88220</u> <del>30</del> <del>miles east of Carlsbad on the Jal Highway, in Eddy</del> <del>County.</del>
TELEPHONE NUMBER:	575/234-7300
U.S. EPA I.D. NUMBER:	NM4890139088
GEOGRAPHIC LOCATION:	<u>32.3697706</u> <del>32° 22' 30" N</del> <u>(WGS84)</u> <u>-103.7913501</u> <del>103° 47' 30" W</del>
DATE OPERATIONS BEGAN:	November 26, 1999

## Item 6

### Description

This modification revises Permit Attachment L, List of Tables, Permit Attachment L, Table L-4, *List of Culebra Wells in the WLMP, Current as of January 2020*, and Permit Attachment L, Figure L-14, *Groundwater Level Surveillance Wells (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)*, with the most current information as of January 2022:

- Attachment L, List of Tables
  - Changed the title of Table L-4 to “*List of Culebra Wells in the WLMP, Current as of January 2022.*”
- Attachment L, Table L-4
  - Changed the title of Table L-4 to “*List of Culebra Wells in the WLMP, Current as of January 2022.*”
  - Changed “H-5b” to “H-5bR.”
  - Changed “WIPP-11” to “WIPP-11R.”
- Attachment L, Figure L-14
  - Changed “H-5b” to “H-5bR.”
  - Changed “WIPP-11” to WIPP-11R.”

### Basis

The change is classified as an "Administrative and informational change..." 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 because wells H-5b and WIPP-11 listed in Table L-4 were plugged and abandoned, then replaced. Wells that have been replaced are designated with an “R” in Table L-4. Figure L-14 was also updated to reflect the changes made in Table L-4. Changes to the figure are shown in red clouds on the new figure. A new figure without these clouds is also provided following the clouded figure. These changes are needed to update the Permit with current information.

**Proposed Revised Permit Text:**

**LIST OF TABLES**

<b>Table</b>	<b>Title</b>
Table L-1	Hydrological Parameters for Rock Units above the Salado at WIPP
Table L-2	WIPP Groundwater Detection Monitoring Program Sample Collection and Groundwater Surface Elevation Measurement Frequency
Table L-3	Standard Operating Procedures Applicable to the DMP
Table L-4	List of Culebra Wells in the WLMP, Current as of <del>January 2020</del> <u>January 2022</u>
Table L-5	Details of Construction for the Six Culebra Detection Monitoring Wells
Table L-6	Analytical Parameter and Sample Requirements

**LIST OF FIGURES**

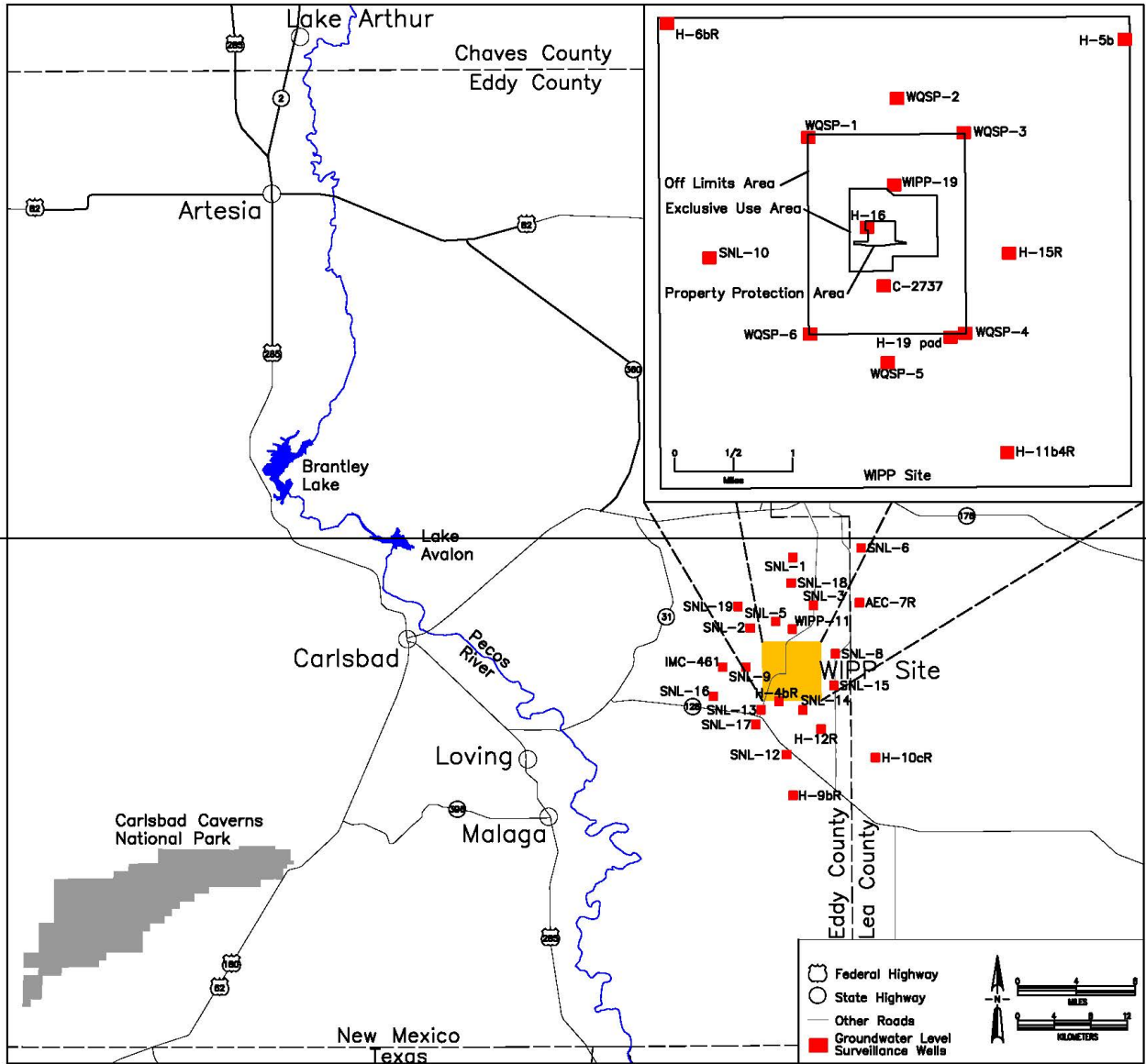
<b>Figure</b>	<b>Title</b>
Figure L-1	General Location of the WIPP Facility
Figure L-2	WIPP Facility Boundaries Showing 16-Square-Mile Land Withdrawal Boundary
Figure L-3	Site Geologic Column
Figure L-4	Generalized Stratigraphic Cross Section above Bell Canyon Formation at WIPP Site
Figure L-5	Culebra Freshwater-Head Potentiometric Surface
Figure L-6	Detection Monitoring Well Locations
Figure L-7	As-Built Configuration of Well WQSP-1
Figure L-8	As-Built Configuration of Well WQSP-2
Figure L-9	As-Built Configuration of Well WQSP-3
Figure L-10	As-Built Configuration of Well WQSP-4
Figure L-11	As-Built Configuration of Well WQSP-5
Figure L-12	As-Built Configuration of Well WQSP-6
Figure L-13	Example Chain-of-Custody Record
Figure L-14	Groundwater Level Surveillance Wells (insert represents the groundwater surveillance wells in WIPP Land Withdrawal Area)

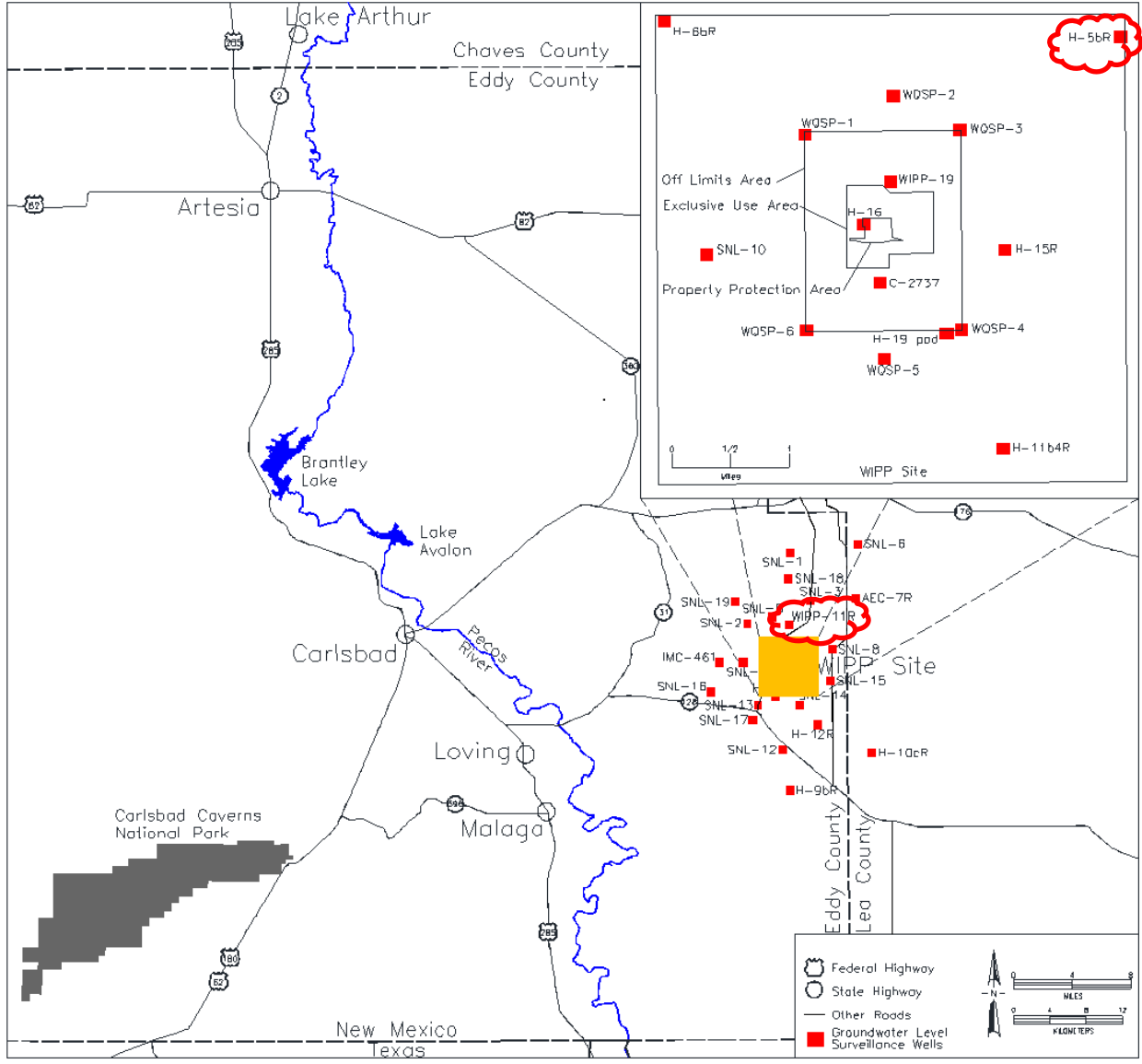


**Table L-4**  
**List of Culebra Wells in the WLMP, Current as of ~~January 2022~~ January 2020**

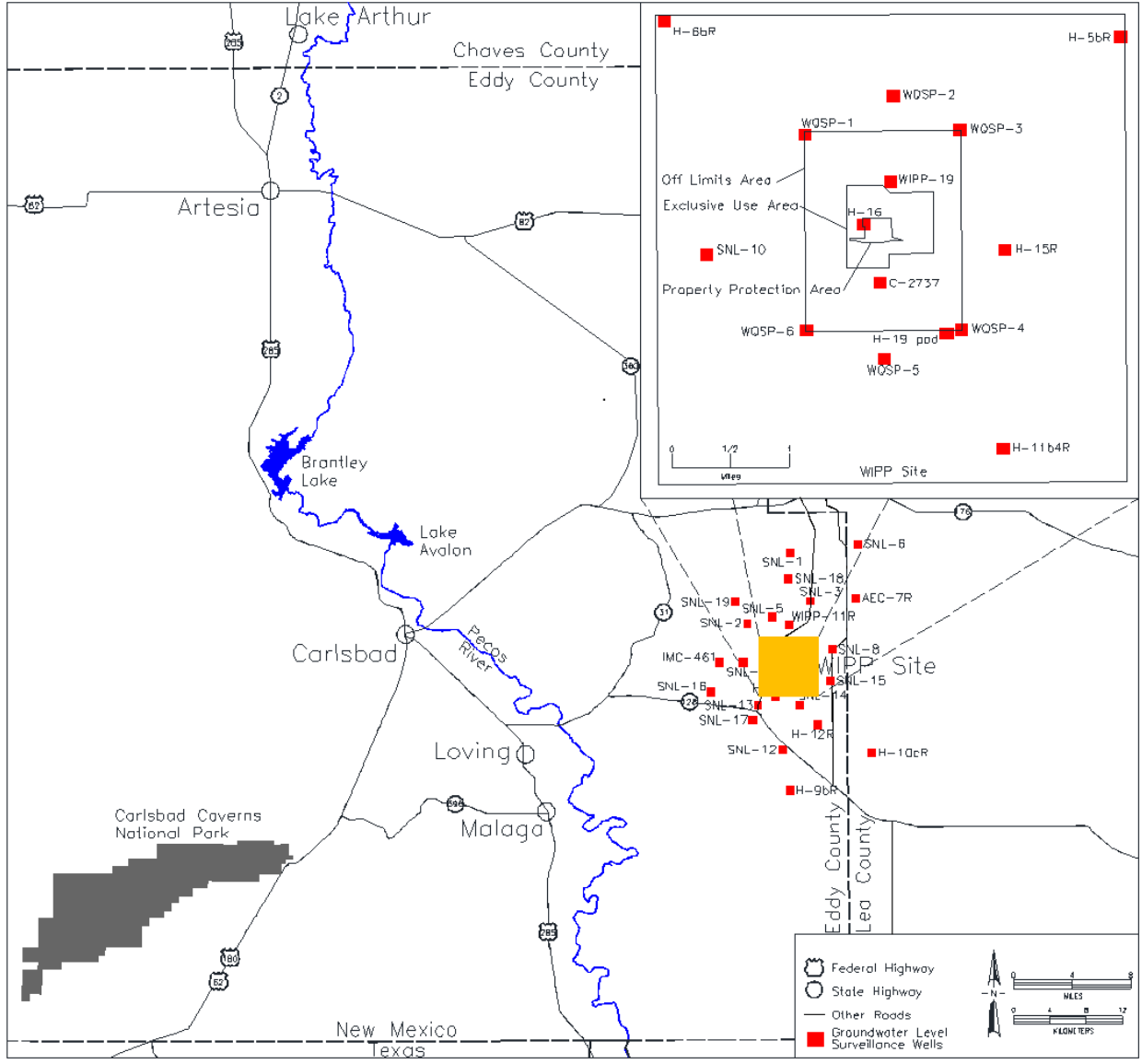
WELL ID	WELL ID	WELL ID
AEC-7R	IMC-461	SNL-15
C-2737	SNL-1	SNL-16
H-4bR	SNL-2	SNL-17
H-5b <u>R</u>	SNL-3	SNL-18
H-6bR	SNL-5	SNL-19
H-9bR	SNL-6	WQSP-1
H-10cR	SNL-8	WQSP-2
H-11b4R	SNL-9	WQSP-3
H-12R	SNL-10	WQSP-4
H-15R	SNL-12	WQSP-5
H-16	SNL-13	WQSP-6
H-19 pad*	SNL-14	WIPP-11 <u>R</u>

\*The water level for the H-19b0 well on the H-19 pad is measured monthly; the fluid density measured annually at well H-19b0 will be used to correct for freshwater head for the other wells on the H-19 pad (H-19b2, H-19b3, H-19b4, H-19b5, H-19b6, and H-19b7).





**Figure L-14**  
**Groundwater Level Surveillance Wells**  
 (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)



**Figure L-14**  
**Groundwater Level Surveillance Wells**  
 (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)

## Item 7

### Description

This modification revises Permit Attachment B, Appendix B1, *Other Environmental Permits, Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of August 2019*, to remove information/lines from this table associated with inactive Permits, plugged and abandoned wells, and to provide updated information where needed. The lines being removed fall under the following categories:

1. Currently listed as "Active" permits in the "Current Permit Status" column that are no longer active and will not be renewed.
2. "P&A" plugged and abandoned wells.
3. Currently listed as "Inactive" permits in the "Current Permit Status" column that were not renewed.

The specific changes being made can be found in the Table of Changes in the Discussion section below.

### Basis

The change is classified as an "Administrative and informational change..." 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 modification updates Permit Attachment B, Appendix B1, with the most current information regarding other environmental permits applicable to the WIPP facility as of January 2022. These changes are needed to update the Permit and to ensure completeness and accuracy of this list of other environmental permits. This modification also removes lines in the following categories:

1. Currently listed as "Active" permits in the "Current Permit Status" column that are no longer active and will not be renewed.
2. "P&A" plugged and abandoned wells.
3. Currently listed as "Inactive" permits in the "Current Permit Status" column that were not renewed.

Lines listed in category 1 shown above in the Description section of this modification are being removed since they are no longer active environmental permits and the Permittees are not seeking renewal of these permits. These permits are no longer needed and are therefore being deleted. Lines listed in category 2 are permits pertaining to inactive plugged and abandoned wells and are therefore being removed. Lines listed in category 3 are inactive permits and are therefore being removed. The regulations at 20.4.1.900 NMAC (incorporating 40 CFR 270.13(k)(9)) require a listing of other relevant environmental permits. Inactive permits including inactive permits for wells that have been plugged and abandoned do not provide relevant information, pursuant to 40 CFR 270.13(k)(9), are therefore being removed. The list of *Other Environmental Permits, Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant* is meant only for "Active Environmental Permits," therefore historical information pertaining to inactive permits is not necessary and is being removed. Changes to the table are updates for active permits and the editorial changes are made to renumber lines in the table.

These changes are needed to update the Permit with current information and to remove unnecessary information. One purpose of the list of *Other Environmental Permits, Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant* is to assure relevant Permit conditions are not in conflict with permit conditions imposed by other agencies. Removing unnecessary information is needed to minimize potential confusion and misunderstanding regarding the applicability of other environmental permit conditions.

### Table of Changes

	Granting Agency	Type of Permit	Permit/Right of Way Number	Explanation for Change
6.	Department of the Interior, Bureau of Land Management	Right-of-Way for Aerosol Sampling Site	NM077924	This permit is no longer active and will not be renewed. A right-of-way permit is not needed for land within the WIPP site boundary since it is owned by the U.S. Department of Energy.
7.	Department of the Interior, Bureau of Land Management	Right-of-Way for Two Subsidence Monuments (S-37 and S-38)	NM082245	This permit is no longer active and will not be renewed. A right-of-way permit is not needed for land within the WIPP site boundary since it is owned by the U.S. Department of Energy.
15.	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Wells C-2723 (WIPP-25), C-2724 (WIPP-26), C-2722 (WIPP-27), C-2636 (WIPP-28), C-2743 (WIPP-29), & C-2727 (WIPP-30)	NM-6-5 Cooperative Agreement	This well was plugged and abandoned and is no longer an active permit.
<u>16</u> 19.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way for Dosimetry and Aerosol Sampling Sites, Angel Ranch	RW-22789	Updated status to indicate that renewal is in progress.
<u>17</u> 20.	New Mexico Environment Department Groundwater Quality Bureau	Discharge Permit	DP-831	Updated permit information.
<u>19</u> 22.	New Mexico Environment Department Petroleum Storage Tank Bureau	Petroleum Storage Tank Registration Certificate	Registration Number <del>2179</del> 4248 Facility Number 31539	Updated permit information.
<del>23.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well Exhaust Shaft Exploratory Borehole</del>	<del>C-2801</del>	<del>This permit is no longer active and will not be renewed.</del>
<del>24.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well Exhaust Shaft Exploratory Borehole</del>	<del>C-2802</del>	<del>Deleted Lines ("Inactive" permits that were not renewed)</del>
<del>25.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well Exhaust Shaft Exploratory Borehole</del>	<del>C-2803</del>	<del>Deleted Lines ("Inactive" permits that were not renewed)</del>
<u>21</u> 27.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-1 Well	C-2413	Removed "Appropriation", the use of Appropriation is for consumptive use wells. This change is to correctly identify the type of permit for these wells as non-consumptive use wells.

	Granting Agency	Type of Permit	Permit/Right of Way Number
<del>22</del> 28.	Office of New Mexico State Engineer	<del>Appropriation</del> -WQSP-2 Well	C-2414
<del>23</del> 29.	Office of New Mexico State Engineer	<del>Appropriation</del> -WQSP-3 Well	C-2415
<del>24</del> 30.	Office of New Mexico State Engineer	<del>Appropriation</del> -WQSP-4 Well	C-2416
<del>25</del> 31.	Office of New Mexico State Engineer	<del>Appropriation</del> -WQSP-5 Well	C-2417
<del>26</del> 32.	Office of New Mexico State Engineer	<del>Appropriation</del> -WQSP-6 Well	C-2418
<del>27</del> 33.	Office of New Mexico State Engineer	<del>Appropriation</del> -WQSP-6a Well	C-2419
34.	Office of New Mexico State Engineer	Monitoring Well AEC-7	C-2742
35.	Office of New Mexico State Engineer	Monitoring Well AEC-8	C-2744
37.	Office of New Mexico State Engineer	Monitoring Well DOE-1	C-2757
40.	Office of New Mexico State Engineer	Monitoring Well H-1	C-2765
41.	Office of New Mexico State Engineer	Monitoring Well H-2a	C-2762

Explanation for Change
Removed "Appropriation", the use of Appropriation is for consumptive use wells. This change is to correctly identify the type of permit for these wells as non-consumptive use wells.
Removed "Appropriation", the use of Appropriation is for consumptive use wells. This change is to correctly identify the type of permit for these wells as non-consumptive use wells.
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	Granting Agency	Type of Permit	Permit/Right of Way Number	Explanation for Change
43.	Office of New Mexico State Engineer	Monitoring Well H 2b2	C-2763	This well was plugged and abandoned and is no longer an active permit. This well was removed from the WIPP Groundwater Detection Monitoring Program Plan in a Class 2 PMR, dated October 25, 2019.
44.	Office of New Mexico State Engineer	Monitoring Well H 2c	C-2759	This well was plugged and abandoned and is no longer an active permit.
46.	Office of New Mexico State Engineer	Monitoring Well H 3b2	C-2760	This well was plugged and abandoned and is no longer an active permit. This well was removed from the WIPP Groundwater Detection Monitoring Program Plan in a Class 2 PMR, dated October 25, 2019.
47.	Office of New Mexico State Engineer	Monitoring Well H 3b3	C-2761	This well was plugged and abandoned and is no longer an active permit.
49.	Office of New Mexico State Engineer	Monitoring Well H 4a	C-2725	This well was plugged and abandoned and is no longer an active permit.
50.	Office of New Mexico State Engineer	Monitoring Well H-4b	C-2775	This well was plugged and abandoned and is no longer an active permit.
52.	Office of New Mexico State Engineer	Monitoring Well H-5a	C-2746	This well was plugged and abandoned and is no longer an active permit.
<del>53.</del> 3553.	Office of New Mexico State Engineer	Monitoring Well H-5b <u>R</u>	C-2745- <u>POD2</u>	Updated permit information since the well was replaced.
54.	Office of New Mexico State Engineer	Monitoring Well H 5c	C-2747	This well was plugged and abandoned and is no longer an active permit.
55.	Office of New Mexico State Engineer	Monitoring Well H 6a	C-2751	This well was plugged and abandoned and is no longer an active permit.
56.	Office of New Mexico State Engineer	Monitoring Well H 6b	C-2749	This well was plugged and abandoned and is no longer an active permit.
58.	Office of New Mexico State Engineer	Monitoring Well H 7a	C-2694	This well was plugged and abandoned and is no longer an active permit.
59.	Office of New Mexico State Engineer	Monitoring Well H-7b1	C-2770	This well was plugged and abandoned and is no longer an active permit. This well was removed from the WIPP Groundwater Detection Monitoring Program Plan in a Class 2 PMR, dated October 25, 2019.

	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>
60.	Office of New Mexico State Engineer	Monitoring Well H-7b2	C-2774
62.	Office of New Mexico State Engineer	Monitoring Well H-9a	C-2785
63.	Office of New Mexico State Engineer	Monitoring Well H-9b	C-2783
66.	Office of New Mexico State Engineer	Monitoring Well H-10b	C-2778
67.	Office of New Mexico State Engineer	Monitoring Well H-10c	C-2695
68.	Office of New Mexico State Engineer	Monitoring Well H-11b1	C-2767
70.	Office of New Mexico State Engineer	Monitoring Well H-11b3	C-2768
71.	Office of New Mexico State Engineer	Monitoring Well H-11b4	C-2769
72.	Office of New Mexico State Engineer	Monitoring Well H-12	C-2777
76.	Office of New Mexico State Engineer	Monitoring Well H-17	C-2773
79.	Office of New Mexico State Engineer	Monitoring Well H-19b1	C-2420
86.	Office of New Mexico State Engineer	Monitoring Well P-14	C-2637
87.	Office of New Mexico State Engineer	Monitoring Well P-15	C-2686
88.	Office of New Mexico State Engineer	Monitoring Well P-17	C-2774
89.	Office of New Mexico State Engineer	Monitoring Well P-18	C-2756
90.	Office of New Mexico State Engineer	Monitoring Well WIPP-12	C-2639

<b>Explanation for Change</b>
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	Granting Agency	Type of Permit	Permit/Right of Way Number	Explanation for Change
<del>94.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 13</del>	<del>C-2748</del>	This well was plugged and abandoned and is no longer an active permit. This well was removed from the WIPP Groundwater Detection Monitoring Program Plan in a Class 2 PMR, dated October 25, 2019.
<del>93.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 19</del>	<del>C-2755</del>	This well was plugged and abandoned and is no longer an active permit. This well was removed from the WIPP Groundwater Detection Monitoring Program Plan in a Class 2 PMR, dated October 25, 2019.
<del>94.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 21</del>	<del>C-2754</del>	This well was plugged and abandoned and is no longer an active permit.
<del>95.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 25</del>	<del>C-2723</del>	This well was plugged and abandoned and is no longer an active permit.
<del>96.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 26</del>	<del>C-2724</del>	This well was plugged and abandoned and is no longer an active permit.
<del>97.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 27</del>	<del>C-2722</del>	This well was plugged and abandoned and is no longer an active permit.
<del>98.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP28</del>	<del>C-2636</del>	This well was plugged and abandoned and is no longer an active permit.
<del>99.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 29</del>	<del>C-2743</del>	This well was plugged and abandoned and is no longer an active permit.
<del>100.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP 30</del>	<del>C-2727</del>	This well was plugged and abandoned and is no longer an active permit.
<del>66</del> 144.	US Fish and Wildlife Service	Special Purpose – Relocate	MB155189-0	Updated permit information.
<del>67</del> 145.	New Mexico Department of Game and Fish	Biotic Collection Permit	Authorization # 3293	Updated permit information.
<del>71</del> 149.	Office of New Mexico State Engineer	Monitoring Well WIPP-11 <u>R</u>	C3112- <u>POD2</u>	Updated permit information.
<del>87</del> 135.	Office of New Mexico State Engineer	Monitoring Well AEC-7R	C-3635- <u>POD1</u>	Updated permit information.
<del>92</del> 140.	Office of New Mexico State Engineer	Monitoring Well H-10cR	C-3851- <u>POD1</u>	Updated permit information.

**Proposed Revised Permit Text:**

**Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of ~~January 2022~~ August 2019**

	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
1.	Department of the Interior, Bureau of Land Management	Right-of-Way for Domestic Water Pipeline	NM053809	05/15/06 (City of Carlsbad, NM)	In Perpetuity	Active
2.	Department of the Interior, Bureau of Land Management	Right-of-Way for the North Access Road	NM055676	08/23/83	In Perpetuity	Active
3.	Department of the Interior, Bureau of Land Management	Right-of-Way for WIPP Railroad Spur and Maintenance Road	NM055699	09/27/83	In Perpetuity	Active
4.	Department of the Interior, Bureau of Land Management	Right-of-Way for Dosimetry and Aerosol Sampling Sites	NM063136	07/03/86	12/31/40	Active
5.	Department of the Interior, Bureau of Land Management	Right-of-Way for Seven Subsidence Monuments	NM065801	11/07/86	None	Active
<del>6.</del>	<del>Department of the Interior, Bureau of Land Management</del>	<del>Right-of-Way for Aerosol Sampling Site</del>	<del>NM077924</del>	<del>08/18/89</del>	<del>08/18/19</del>	<del>Active</del>
<del>7.</del>	<del>Department of the Interior, Bureau of Land Management</del>	<del>Right-of-Way for Two Subsidence Monuments (S-37 and S-38)</del>	<del>NM082245</del>	<del>12/13/89</del>	<del>12/13/19</del>	<del>Active</del>
<del>68.</del>	Department of the Interior, Bureau of Land Management	Right-of-Way for telephone cable	NM046092	09/04/81 (Valor Telecom)	12/31/40	Active
<del>79.</del>	Department of the Interior, Bureau of Land Management	Right-of-Way for 115 KV Electric Transmission Line	NM043203	10/19/81 (Xcel Energy)	12/31/40	Active
<del>840.</del>	Department of the Interior, Bureau of Land Management	Right-of-Way for South Access Road (includes Rally Point)	NM123703	01/27/10	12/31/39	Active
<del>944.</del>	Department of the Interior, Bureau of Land Management	Right-of-Way for Mosaic (Duval Mine Site-Nash Draw) telephone line	NM060174	03/08/85 (Valor Telecom)	03/08/35	Active
<del>102.</del>	Department of the Interior, Bureau of Land Management	Right-of-Way for groundwater monitor wells/pads	NM108365	08/30/02	08/30/32	Active
<del>113.</del>	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Well C-2664 (Cabin Baby)	NM107944	04/23/02	04/23/32	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
<u>124.</u>	Department of the Interior, Bureau of Land Management	Right-of-Way for Wells C-2725 (H-4A), C-2775 (H-4B), & C-2776 (H-4C)	NM-6-5 Cooperative Agreement	04/27/78	None	Active
<u>135.</u>	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Wells C-2723 (WIPP-25), C-2724 (WIPP-26), C-2722 (WIPP-27), C-2636 (WIPP-28), C-2743 (WIPP-29), & C-2727 (WIPP-30)	NM-6-5 Cooperative Agreement	<del>07/14/78</del>	None	P&A
<u>136.</u>	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for accessing state trust lands in Eddy & Lea Counties	RW-25430	09/28/04	10/31/18	Active Renewal in Process
<u>147.</u>	Department of Interior, Bureau of Land Management	Right of Way for Buried Fiber Optics Line	NM113339	08/09/05 (Valor Telecom)	12/31/34	Active
<u>158.</u>	Department of Interior, Bureau of Land Management	Right of Way for South Access Road Fence	NM094304	03/15/95	None	Active
<u>169.</u>	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way for Dosimetry and Aerosol Sampling Sites, Angel Ranch	RW-22789	10/03/85	10/03/20	Active <a href="#">Renewal in Process</a>
<u>1720.</u>	New Mexico Environment Department Groundwater Quality Bureau	Discharge Permit	DP-831	<del>07/29/14</del> <a href="#">12/30/2021</a>	<del>07/29/19</del> <a href="#">12/30/2026</a>	Active Renewal in Process
<u>1824.</u>	New Mexico Environment Department Air Quality Bureau	Operating Permit for two backup diesel generators	310-M-2	12/07/93	None	Active
<u>1922.</u>	New Mexico Environment Department Petroleum Storage Tank Bureau	Petroleum Storage Tank Registration Certificate	Registration Number <del>2179</del> 4248 Facility Number 31539	07/01/ <del>21</del> 19	<del>06/30/20</del> <a href="#">06/30/22</a>	Active
<del>23.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well Exhaust Shaft Exploratory Borehole</del>	<del>C-2801</del>	<del>02/23/04</del>	None	Inactive
<del>24.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well Exhaust Shaft Exploratory Borehole</del>	<del>C-2802</del>	<del>02/23/04</del>	None	Inactive
<del>25.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well Exhaust Shaft Exploratory Borehole</del>	<del>C-2803</del>	<del>02/23/04</del>	None	Inactive
<u>206.</u>	Office of New Mexico State Engineer	Monitoring Well C-2811	C-2811	03/02/01	None	Active

	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
<del>21</del> 7.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-1 Well	C-2413	10/21/96	None	Active
<del>22</del> 8.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-2 Well	C-2414	10/21/96	None	Active
<del>23</del> 9.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-3 Well	C-2415	10/21/96	None	Active
<del>24</del> 30.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-4 Well	C-2416	10/21/96	None	Active
<del>25</del> 31.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-5 Well	C-2417	10/21/96	None	Active
<del>26</del> 32.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-6 Well	C-2418	10/21/96	None	Active
<del>27</del> 33.	Office of New Mexico State Engineer	<del>Appropriation</del> :-WQSP-6a Well	C-2419	10/21/96	None	Active
<del>34</del> .	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well AEG-7</del>	<del>C-2742</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>35</del> .	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well AEG-8</del>	<del>C-2744</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>28</del> 36.	Office of New Mexico State Engineer	Monitoring Well CB-1	C-2664	07/30/99	None	Active
<del>37</del> .	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well DOE-1</del>	<del>C-2757</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>29</del> 38.	Office of New Mexico State Engineer	Monitoring Well DOE-2	C-2682	04/17/00	None	Active
<del>30</del> 9.	Office of New Mexico State Engineer	Monitoring Well ERDA-9	C-2752	11/06/00	None	Active
<del>40</del> .	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-1</del>	<del>C-2765</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>41</del> .	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-2a</del>	<del>C-2762</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>31</del> 42.	Office of New Mexico State Engineer	Monitoring Well H-2b1	C-2758	11/06/00	None	Active
<del>43</del> .	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-2b2</del>	<del>C-2763</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
44.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-2c</del>	<del>C-2759</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>32</del> 45.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-3b1</del>	<del>C-2764</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
46.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-3b2</del>	<del>C-2760</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
47.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-3b3</del>	<del>C-2764</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>33</del> 48.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-3d</del>	<del>C-3207</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
49.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-4a</del>	<del>C-2725</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
50.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-4b</del>	<del>C-2775</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>34</del> 51.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-4c</del>	<del>C-2776</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
52.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-5a</del>	<del>C-2746</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>35</del> 53.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-5b</del> <u>R</u>	<del>C-2745-<u>POD2</u></del>	<del>02/07/19</del> 11/06/00	<del>None</del>	<del>Active</del>
54.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-5c</del>	<del>C-2747</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
55.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-6a</del>	<del>C-2754</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
56.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-6b</del>	<del>C-2749</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>36</del> 57.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-6c</del>	<del>C-2750</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
58.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-7a</del>	<del>C-2694</del>	<del>04/17/00</del>	<del>None</del>	<del>P&amp;A</del>
59.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-7b1</del>	<del>C-2770</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
60.	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-7b2</del>	<del>C-2771</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>

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<del>37</del> 64.	Office of New Mexico State Engineer	Monitoring Well H-8a	C-2780	11/06/00	None	Active
<del>62.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-9a</del>	<del>C-2785</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>63.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-9b</del>	<del>C-2783</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>38</del> 64.	Office of New Mexico State Engineer	Monitoring Well H-9c	C-2784	11/06/00	None	Active
<del>39</del> 65.	Office of New Mexico State Engineer	Monitoring Well H-10a	C-2779	11/06/00	None	Active
<del>66.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-10b</del>	<del>C-2778</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>67.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-10c</del>	<del>C-2695</del>	<del>04/17/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>68.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-11b1</del>	<del>C-2767</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>40</del> 69.	Office of New Mexico State Engineer	Monitoring Well H-11b2	C-2687	04/17/00	None	Active
<del>70.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-11b3</del>	<del>C-2768</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>71.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-11b4</del>	<del>C-2769</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>72.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-12</del>	<del>C-2777</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>41</del> 73.	Office of New Mexico State Engineer	Monitoring Well H-14	C-2766	11/06/00	None	Active
<del>42</del> 74.	Office of New Mexico State Engineer	Monitoring Well H-15	C-2685	04/17/00	None	Active
<del>43</del> 75.	Office of New Mexico State Engineer	Monitoring Well H-16	C-2753	11/06/00	None	Active
<del>76.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-17</del>	<del>C-2773</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
<del>44</del> 77.	Office of New Mexico State Engineer	Monitoring Well H-18	C-2683	04/17/00	None	Active



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<u>4578.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b0	C-2420	01/25/95	None	Active
<del>79.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well H-19b1</del>	<del>C-2420</del>	<del>01/25/95</del>	<del>None</del>	<del>P&amp;A</del>
<u>4680.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b2	C-2421	01/25/95	None	Active
<u>4784.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b3	C-2422	01/25/95	None	Active
<u>4882.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b4	C-2423	01/25/95	None	Active
<u>4983.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b5	C-2424	01/25/95	None	Active
<u>5084.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b6	C-2425	01/25/95	None	Active
<u>5185.</u>	Office of New Mexico State Engineer	Monitoring Well H-19b7	C-2426	01/25/95	None	Active
<del>86.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well P-14</del>	<del>C-2637</del>	<del>01/02/99</del>	<del>None</del>	<del>P&amp;A</del>
<del>87.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well P-15</del>	<del>C-2686</del>	<del>04/17/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>88.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well P-17</del>	<del>C-2774</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>89.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well P-18</del>	<del>C-2756</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>
<del>90.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP-12</del>	<del>C-2639</del>	<del>01/12/99</del>	<del>None</del>	<del>P&amp;A</del>
<del>91.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP-13</del>	<del>C-2748</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
<u>5292.</u>	Office of New Mexico State Engineer	Monitoring Well WIPP-18	C-2684	04/17/00	None	Active
<del>93.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP-19</del>	<del>C-2755</del>	<del>11/06/00</del>	<del>None</del>	<del>Active</del>
<del>94.</del>	<del>Office of New Mexico State Engineer</del>	<del>Monitoring Well WIPP-21</del>	<del>C-2754</del>	<del>11/06/00</del>	<del>None</del>	<del>P&amp;A</del>

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95.	Office of New Mexico State Engineer	Monitoring Well WIPP-25	C-2723	07/26/00	None	P&A
96.	Office of New Mexico State Engineer	Monitoring Well WIPP-26	C-2724	11/06/00	None	P&A
97.	Office of New Mexico State Engineer	Monitoring Well WIPP-27	C-2722	11/06/00	None	P&A
98.	Office of New Mexico State Engineer	Monitoring Well WIPP28	C-2636	01/12/99	None	P&A
99.	Office of New Mexico State Engineer	Monitoring Well WIPP-29	C-2743	11/06/00	None	P&A
100.	Office of New Mexico State Engineer	Monitoring Well WIPP-30	C-2727	08/04/00	None	P&A
<u>53</u> 401.	Office of New Mexico State Engineer	Monitoring Well H-6bR	C-3362	12/27/07	None	Active
<u>54</u> 402.	Office of New Mexico State Engineer	Monitoring Well H-15R	C-3361	12/27/07	None	Active
<u>55</u> 403.	Office of New Mexico State Engineer	Monitoring Well SNL-2	C-2948	02/14/03	None	Active
<u>56</u> 404.	Office of New Mexico State Engineer	Monitoring Well SNL-9	C-2950	02/14/03	None	Active
<u>57</u> 405.	Office of New Mexico State Engineer	Monitoring Well SNL-12	C-2954	02/25/03	None	Active
<u>58</u> 406.	Office of New Mexico State Engineer	Monitoring Well SNL-1	C-2953	02/25/03	None	Active
<u>59</u> 407.	Office of New Mexico State Engineer	Monitoring Well SNL-3	C-2949	02/14/03	None	Active
<u>60</u> 408.	Office of New Mexico State Engineer	Monitoring Well SNL-5	C-3002	10/01/03	None	Active
<u>61</u> 409.	Office of New Mexico State Engineer	Monitoring Well IMC-461	C-3015	11/25/03	None	Active
<u>62</u> 410.	Office of New Mexico State Engineer	Monitoring Well SNL-10	C-3221	07/26/05	None	Active
<u>63</u> 411.	Office of New Mexico State Engineer	Monitoring Well SNL-16	C-3220	07/26/05	None	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
<del>64</del> 442.	Office of New Mexico State Engineer	Monitoring Well SNL-17	C-3222	07/26/05	None	Active
<del>65</del> 443.	US Environmental Protection Agency Region 6	Conditions of Approval for Disposal of PCB/TRU and PCB/TRU Mixed Waste at the US Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico	N/A	03/19/18	03/19/23	Active
<del>66</del> 444.	US Fish and Wildlife Service	Special Purpose – Relocate	MB155189-0	<del>05/21/2005/04/17</del>	<del>03/31/23</del> 12/31/20	Active
<del>67</del> 445.	New Mexico Department of Game and Fish	Biotic Collection Permit	Authorization # 3293	<del>03/02/2002/02/17</del>	<del>12/31/22</del> 12/31/19	Active
<del>68</del> 446.	Office of New Mexico State Engineer	Monitoring Well H-4bR	C-3404	01/13/09	None	Active
<del>69</del> 447.	Office of New Mexico State Engineer	Monitoring Well H-9bR	C-2783-POD2	07/14/10	None	Active
<del>70</del> 448.	Office of New Mexico State Engineer	Monitoring Well C-2737	C-2737	09/27/00	None	Active
<del>71</del> 449.	Office of New Mexico State Engineer	Monitoring Well WIPP-11R	C3112- <del>POD2</del>	<del>12/27/07</del> 02/07/19	None	Active
<del>72</del> 420.	Office of New Mexico State Engineer	Monitoring Well SNL-6	C-3151	02/10/05	None	Active
<del>73</del> 421.	Office of New Mexico State Engineer	Monitoring Well SNL-8	C-3150	02/10/05	None	Active
<del>74</del> 422.	Office of New Mexico State Engineer	Monitoring Well SNL-13	C-3139	12/17/04	None	Active
<del>75</del> 423.	Office of New Mexico State Engineer	Monitoring Well SNL-14	C-3140	12/17/04	None	Active
<del>76</del> 424.	Office of New Mexico State Engineer	Monitoring Well SNL-15	C-3152	02/10/05	None	Active
<del>77</del> 425.	Office of New Mexico State Engineer	Monitoring Well SNL-18	C-3233	10/06/05	None	Active
<del>78</del> 426.	Office of New Mexico State Engineer	Monitoring Well SNL-19	C-3234	10/06/05	None	Active

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<del>79</del> 427.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-18 and SNL-19 well pads	NM115315	03/21/06	12/31/35	Active
<del>80</del> 428.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-11 and SNL-5 well pads and road access	NM110735	10/16/03	10/16/33	Active
<del>81</del> 429.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-12 well pad	NM109176	04/15/03	04/15/33	Active
<del>82</del> 430.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-9 well pad	NM109175	04/15/03	04/15/33	Active
<del>83</del> 431.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-2 well pad	NM109174	04/15/03	04/15/33	Active
<del>84</del> 432.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-1 Access Road	NM109177	06/17/03	06/17/33	Active
<del>85</del> 433.	Department of the Interior, Bureau of Land Management	Right-of-Way for 69KV Electric Distribution Line	NM091163	02/16/94 (Xcel Energy)	02/15/24	Active
<del>86</del> 434.	Office of New Mexico State Engineer	Monitoring Well H-11b4R	C-2769-POD2	05/16/11	None	Active
<del>87</del> 435.	Office of New Mexico State Engineer	Monitoring Well AEC-7R	C-3635- <del>POD1</del>	04/24/13	None	Active
<del>88</del> 436.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-1 Access Road and well pad	RW-28535	08/27/03	08/27/38	Active
<del>89</del> 437.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-3 Access Road and well pad	RW-28537	08/27/03	08/27/38	Active
<del>90</del> 438.	Office of New Mexico State Engineer	Monitoring Well H-12R	C-3749 POD1	06/24/14	None	Active
<del>91</del> 439.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for H-12R Access Road and well pad	NM-131916	06/19/14	12/31/43	Active
<del>92</del> 440.	Office of New Mexico State Engineer	Monitoring Well H-10cR	C-3851- <del>POD1</del>	07/09/15	None	Active
<del>93</del> 441.	New Mexico State Land Office	Water Monitoring Easement for SNL-1	WM-120	07/20/18	08/21/22	Active
<del>94</del> 442.	New Mexico State Land Office	Water Monitoring Easement for SNL-3	WM-119	07/20/18	08/21/22	Active
<del>95</del> 443.	U.S. Department of the Interior, Bureau of Land Management	Seismic Monitoring Stations	NM-120413	07/10/08	12/31/37	Active

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<u>96444</u> .	New Mexico Environment Department	NSR Streamline, Level 1, Minor Source, Air Permit	310-M3	07/12/19	None	Active

\*Non DOE grantee is noted  
P&A=Plugged and Abandoned

## Item 8

### Description

This modification revises Attachment F, Section F-1b(1), *Training Content* with the following changes:

- Revised “an” to “the.”
- Added “GET” prior to “refresher.”

### Basis

These changes are classified as “Administrative and informational changes” and are, therefore, Class 1 modifications pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

### Discussion

The language in Permit Attachment F, Section F-1b(1) *Training Content* could be misinterpreted to indicate that additional specific training (beyond what is provided in General Employee Training (**GET**)) may be required for onsite facility personnel. However, the context of this paragraph is referring to the contents of both initial and refresher GET training only and not to other specific training courses that may have their own refresher requirements. This change is needed to clarify that onsite facility personnel receive GET training and the annual GET refresher training with regard to the GET topics listed and it should not be interpreted as requiring additional training.

This change does not decrease the amount of or makes changes to the type of training given to WIPP facility employees.

**Proposed Revised Permit Text:**

F-1b(1) Training Content

To ensure that facility personnel are knowledgeable in responding effectively to emergency situations, every employee, regardless of whether they hold a position in TRU mixed waste management or emergency response, receives GET and an the annual GET refresher training on topics relevant to the management of TRU mixed waste and emergency response that include:

- Emergency Preparedness and Response
- RCRA (including the Permit and the RCRA Contingency Plan)
- Fire Protection
- Safety Signage