

1 **Introduction**
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3 The Waste Isolation Pilot Plant (**WIPP**) is a facility designed, constructed, and operated for the
4 management, storage and disposal of transuranic (**TRU**) mixed waste. Both contact-handled
5 (**CH**) and remote-handled (**RH**) TRU mixed wastes are permitted for storage and disposal at the
6 WIPP facility. The WIPP facility consists of a 16-section Federal land area under the
7 jurisdiction of the US Department of Energy (**DOE**). The WIPP is a mined geologic repository,
8 defined as a “miscellaneous unit” under 40 CFR §260.10. “Miscellaneous unit” means a
9 hazardous waste management unit where hazardous waste is treated, stored, or disposed of and
10 that is not a container, tank, surface impoundment, waste pile, land treatment unit, landfill,
11 incinerator, containment building, boiler, industrial furnace, or underground injection well with
12 appropriate technical standards under 40 CFR Part 146, corrective action management unit, or
13 unit eligible for research, development, and demonstration permit under 40 CFR §270.65. The
14 WIPP is a deep, mined geologic repository designed for the disposal of TRU mixed waste. Some
15 of the TRU mixed wastes disposed of at the WIPP contain hazardous wastes as co-contaminants.
16 The geologic repository has been divided into ten discrete hazardous waste disposal units
17 (**HWDUs**) which are being permitted under 40 CFR Part 264, Subpart X. Additionally, the
18 WIPP has a Waste Handling Building divided into CH and RH TRU hazardous waste
19 management units (**HWMUs**) and outside of the Waste Handling Building there is another
20 HWMU know as the Parking Area Unit. These three HWMUs are permitted as storage units.
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22 This WIPP Hazardous Waste Facility Permit (Permit) Renewal Application (Renewal
23 Application) is submitted to address the requirements of the New Mexico Administrative Code
24 Title 20, Chapter 4, Part 1 (20.4.1 NMAC) specific to the hazardous mixed waste operations of
25 the WIPP. The WIPP has three permitted storage units and seven permitted underground
26 disposal units, known as panels.
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28 Pursuant to the New Mexico Hazardous Waste Regulations and the WIPP Hazardous Waste
29 Facility Permit, Permit Condition I.E.3.:

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31 *If the Permittees wish to continue an activity regulated by this Permit after the*
32 *expiration date of this Permit, the Permittees shall apply for and obtain a new Permit.*
33 *The Permittees shall submit an application for a new Permit at least one hundred*
34 *eighty (180) calendar days before the expiration date of this Permit. [20.4.1.900 NMAC*
35 *(incorporating 40 CFR §§270.10(h), 270.30(b))]*
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37 The term of the Permit is ten years from the date of issuance. The WIPP Renewal Application is
38 due to the New Mexico Environment Department (**NMED**) no later than May 30, 2009. Part A
39 of the Renewal Application must include the information required by 40 CFR §270.13, *Contents*
40 *of Part A of the permit application*. Additionally, Part B of the Renewal Application must
41 include general WIPP information required by 40 CFR §270.14, *Contents of Part B: General*
42 *Requirements*, as well as WIPP specific information required by 40 CFR §270.15, *40 Specific*
43 *Part B information requirements for containers*; and CFR §270.23, *Specific Part B information*
44 *requirements for miscellaneous units*.
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1 In this Renewal Application the Permittees are seeking the following changes:
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- 3 • Authorization to dispose of TRU mixed-waste in Panel 8
- 4 • Formal inclusion of the WIPP Mine Ventilation Rate Monitoring Plan
- 5 • Changes to the Waste Analysis Plan (**WAP**). The changes proposed to the Waste
6 Analysis Plan are summarized in the WAP Reviewer's Guide located in the *Summary of*
7 *Proposed Changes*. The Reviewer's Guide contains a description of the change and
8 identifies the Section number of the WAP where the change is located.
- 9 • Make technical edits (e.g., typographical/editorial/reference) in Renewal Application
10 chapters and appendices affected by proposed Renewal Application changes.
- 11 • Other changes to improve waste management processes as described in the *Summary of*
12 *Proposed Changes* and indicated by redline strikeout text.

13 Portions of the WIPP Hazardous Waste Facility Permit, Permit No. NM4890139088-TSDF, are
14 incorporated into the Renewal Application by reference. In instances where the use of the term
15 "Permit Attachment" is used, it refers to those Permit sections in place at the time of the
16 submittal of the Renewal Application to the NMED. When referencing the Renewal Application
17 or original Part B Permit Application, the terms "chapters" and "appendices" are used to
18 distinguish between the current Permit and permit applications. The Renewal Application
19 contains no "Modules" as the NMED writes the Modules for draft and final permits.
20 Furthermore, the Permittees are submitting "addenda" with the Renewal Application. Addenda
21 contain information that may be useful in the review of the Renewal Application chapters. Other
22 "supplemental information" has been provided in an electronically retrievable format, including
23 an index of the referenced information. The Supplemental Information contains references that
24 are cited in the Renewal Application with the exception of regulations, codes and standards and
25 copyrighted materials. In these cases, links to where these materials may be viewed or
26 purchased are included. In a few instances, large documents that are referenced are also
27 provided via a link.
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29 Additionally, the Permittees are representing proposed changed text from the current Permit in
30 ~~redline/strike out~~ format. For those who wish to print the document and do not have a color
31 printer, proposed replacement text is also double underlined and shaded so that proposed text can
32 be readily identified. For example, the resulting text appears as: new proposed text.

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34 The version of the Permit used to create the Renewal Application is the latest version the NMED
35 has posted on its web page May 22, 2009.