ATTACHMENT A

GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION

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TABLE OF CONTENTS

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A-1 Facility Description

Abstract

NAME OF FACILITY:	Waste Isolation Pilot Plant
OWNER and CO-OPERATOR:	U.S. Department of Energy (**DOE**) P.O. Box 3090 Carlsbad, NM 88221
CO-OPERATOR:	Salado Isolation Mining Contractors LLC (**SIMCO**) P.O. Box 2078 Carlsbad, NM 88221
RESPONSIBLE OFFICIALS:	Mark Bollinger Manager, DOE/Carlsbad Field Office Ken Harrawood Program Manager, Salado Isolation Mining Contractors LLC
FACILITY MAILING ADDRESS:	U.S. Department of Energy P.O. Box 3090 Carlsbad, NM 88221
FACILITY LOCATION:	34 Louis Whitlock Road, Carlsbad, NM 88220
TELEPHONE NUMBER:	575/243-4432
U.S. EPA I.D. NUMBER:	NM4890139088
GEOGRAPHIC LOCATION: (WGS84)	32.3697706 -103.7913501
DATE OPERATIONS BEGAN:	November 26, 1999

A-2 Description of Activities

The Waste Isolation Pilot Plant (**WIPP**) is a facility for the management, storage, and disposal of transuranic (**TRU**) mixed waste subject to regulation under 20.4.1.500 New Mexico Administrative Code (**NMAC**), incorporating Title 40 of the Code of Federal Regulations (**CFR**) Part 264. Both contact-handled (**CH**) and remote-handled (**RH**) TRU mixed wastes are permitted for storage and disposal at the WIPP facility.

A-3 Property Description

The WIPP property has been divided into functional areas. The Property Protection Area (**PPA**) is surrounded by a security barrier, which encompasses approximately 34 acres without the New Filter Building (**NFB**) and approximately 44 acres with the NFB and provides security and protection for the major surface structures. A second PPA consisting of a nominal 22 acres surrounds Shaft #5. The DOE Off Limits Area encloses the PPA and is approximately 1,454 acres. These areas define the DOE exclusion zone within which certain items and material are prohibited. The final zone is marked by the WIPP Site Boundary, a 16-section Federal land area (Land Withdrawal Area) under the jurisdiction of the DOE.

A-4 Facility Type

There are three basic groups of structures associated with the WIPP facility: surface structures, shafts and underground structures. The surface structures accommodate the personnel, equipment, and support services required for the receipt, preparation, and transfer of TRU mixed waste from the surface to the underground. There are two surface locations where TRU mixed waste is managed and stored. The first area is the Waste Handling Building (**WHB**) Container Storage Unit (**WHB Unit**) for TRU mixed waste management and storage. The WHB Unit consists of the WHB CH Bay, Room 108, and the RH Complex. The second area designated for managing and storing TRU mixed waste is the Parking Area Container Storage Unit (**PAU**), an outside container storage area which extends south from the WHB to the chain-link security fence. The PAU provides storage space for CH shipping containers referred to as CH packages and RH shipping containers referred to as RH packages on an asphalt and concrete surface. Permit Part 3 authorizes the storage and management of CH and RH TRU mixed waste containers in these two surface locations. The technical requirements of 20.4.1.500 NMAC (incorporating 40 CFR §§264.170 to 264.178) are applied to the operation of the WHB Unit and the PAU. Permit Attachment A1 describes the container storage units, the TRU mixed waste management facilities and operations, and compliance with the technical requirements of 20.4.1.500 NMAC (incorporating 40 CFR §§264.170 to 264.178).

Four vertical shafts connect the surface facility to the underground. These are the Waste Shaft, the Salt Handling Shaft, the Exhaust Shaft, and the Air Intake Shaft. A fifth shaft, Shaft #5, located nominally 1,200 feet west of the Air Intake Shaft also connects the underground facility to the surface. The Waste Shaft is the only shaft used to transport TRU mixed waste to the underground. The WIPP facility underground structures are located in a mined salt bed approximately 2,150 feet below the surface. The underground facility is defined in 20.4.1.100 NMAC (incorporating 40 CFR §260.10) as a “miscellaneous unit.” As a miscellaneous unit, hazardous waste management units within the repository are subject to permitting according to 20.4.1.900 and 20.4.1.901 NMAC (incorporating 40 CFR Part 270) and are regulated under 20.4.1.500 NMAC (incorporating 40 CFR 264, Subpart X, *Miscellaneous Units*).The underground structures include the underground Hazardous Waste Disposal Units (**HWDUs**),

areas for future underground HWDUs, the shaft pillar area, interconnecting drifts and other areas unrelated to the Hazardous Waste Facility Permit. The underground HWDUs are defined as waste panels, each consisting of seven rooms and two access drifts. The WIPP facility underground area is designated as Panels 1 through 12, although only Panels 7 through 12, will be used under the terms of this Permit, because Panels 1-6 are filled and closed. Each of the seven rooms is approximately 300 feet long, 33 feet wide and 13 feet high in Panels 1-7, and approximately 300 feet long, 33 feet wide, and 16 feet high in Panel 8. Permit Part 4 authorizes the management and disposal of CH and RH TRU mixed waste containers in underground HWDUs.

The Disposal Phase of the WIPP Project consists of receiving loaded CH and RH packages, unloading and transporting the waste containers to the underground HWDUs, emplacing the waste in the underground HWDUs, and subsequently achieving closure of the underground HWDUs in compliance with applicable state and federal regulations. As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601), the Permittees shall ensure that the environmental performance standards for a miscellaneous unit, which are applied to the underground HWDUs in the geologic repository, will be met. Permit Attachment A2 describes the underground HWDUs, the TRU mixed waste management facilities and operations, and compliance with the technical requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). Permit Attachments G, G1, and G2 describe the closure activities.

A-5 Waste Description

Wastes destined for disposal at the WIPP facility are byproducts of nuclear weapons production and have been identified in terms of waste streams based on the processes that produced them. Waste streams identified by generators are assigned to a Waste Summary Category to reflect the final waste forms acceptable for transportation and disposal. Details regarding the Summary Category Groups and waste characterization can be found in Permit Attachment C.

Wastes may be generated at the WIPP facility as a direct result of managing the TRU and TRU mixed wastes received from the off-site generators. Such waste may be generated in either the WHB or the underground. This waste is referred to as “derived waste,” which means its hazardous waste characteristics are derived from the off-site waste that produced it. Such derived waste will be placed in the rooms in HWDUs along with the TRU mixed waste for disposal.

Non-mixed hazardous wastes generated at the WIPP facility, through activities where contact with TRU mixed waste does not occur, are characterized, placed in containers, and stored (for periods not exceeding the limits specified in 20.4.1.300 NMAC (incorporating 40 CFR §262.17)) until they are transported off site for treatment and/or disposal at a designated facility. This waste generation and accumulation activity, when performed in compliance with 20.4.1.300 NMAC (incorporating 40 CFR Part 262), is not subject to RCRA permitting requirements and, as such, is not addressed in the permit, with the exception of the requirements of 20.4.1.300 NMAC (incorporating 40 CFR Part 262, Subpart M), which are addressed in Permit Attachment D.

A-6 Chronology of Events Relevant to Changes in Ownership or Operational Control

December 19, 1997	The New Mexico Environment Department (**NMED**) received notification of a change of name/ownership from Westinghouse Electric Corporation to CBS Corporation. The WIPP facility Management and Operating Contractor (**MOC**), Westinghouse Waste Isolation Division (**WID**), became a division of Westinghouse Electric Company, which in turn was a division of CBS Corporation. Notification to NMED was made by the permit applicant in a letter dated December 18, 1997. The Permit application was under review, but a draft Permit was not yet issued.
September 22, 1998	The NMED received notification of a pending transfer of ownership for the MOC, Westinghouse WID, from CBS Corporation to an as-yet-to-be-named limited liability company owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen Corporation. The transfer of ownership was scheduled to occur on or about December 15, 1998. Notification to NMED was made by the permit applicant in a letter dated September 17, 1998. The draft Permit had been issued for public comment, but the final Permit was not yet issued.
March 9, 1999	The NMED again received notification of the pending divestiture of the MOC, Westinghouse WID, by CBS Corporation to the limited liability company owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen Corporation known as MK/BNFL GESCO LLC. The new MOC would be renamed to Westinghouse Government Environmental Services Company LLC (**WGES**). Notification to NMED was made by the permit applicant in a letter dated March 2, 1999. The public hearing on the Permit was underway, but the final Permit was not yet issued.
March 26, 1999	The NMED received official notification of the divestiture of Westinghouse Electric Company by CBS Corporation to MK/BNFL GESCO LLC effective March 22, 1999. The MOC was renamed WGES, of which Westinghouse WID was a division. This transaction constituted a change of operational control under 20.4.1.900 NMAC (incorporating 40 CFR §270.40). Notification to NMED was made by the permit applicant in a letter dated March 24, 1999. The public hearing on the Permit was nearly concluded, but the final Permit was not yet issued.
April 28, 1999	The NMED received a revised Part A Permit Application in a letter dated April 21, 1999, reflecting that the Westinghouse WID, co-operator of the WIPP facility, was now a part of WGES. However, the final Permit, issued October 27, 1999, did not reflect the change in ownership.
July 25, 2000	The NMED received a Class 1 permit modification in a letter dated July 21, 2000, changing the name in the Permit from WGES WID. This notification did not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.

December 15, 2000	The DOE announced that it had awarded a five-year contract for management and operation of the WIPP facility to Westinghouse TRU Solutions LLC, a limited liability company owned jointly by WGES LLC and Roy F. Weston, Inc. The announcement further stated that, following a brief transition period, the new contractor would assume MOC responsibilities on February 1, 2001. This transaction constituted a change of operational control under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) requiring a Class 1 permit modification with prior written approval of NMED.
February 5, 2001	The NMED received a Class 1 permit modification in a letter dated February 2, 2001, which notified NMED of an organizational name change of the MOC from WGES WID to Westinghouse TRU Solutions LLC. This notification did not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.
December 31, 2002	The NMED received a Class 1 permit modification in a letter dated December 27, 2002, which changed the name of the MOC from Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC (**WTS**). This notification did not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.
February 28, 2003	The NMED received a Class 1 permit modification requiring prior agency approval in a letter dated February 28, 2003, to satisfy the requirements specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.40) to reflect the transfer of the permit to a new operator.
September 16, 2004	The NMED received a Class 1 permit modification requiring prior agency approval in a letter dated September 16, 2004, describing a change of ownership ofWTS. WTS is owned jointly by WGES, managing member, and Weston Solutions, Inc. WGES had been owned jointly by Washington Group International, Inc. (**WGI**), and BNFL Nuclear Services, Inc. However, WGI has acquired BNFL's prior interest in the former Westinghouse government services businesses, which includes BNFL's prior interest in WGES.
August 6, 2007	The NMED received notification in a letter dated August 2, 2007 of the pending acquisition of WGI by URS Corporation at an unknown future date. This acquisition would be related to operational control, because WGI is the sole owner of WGES, managing member of the joint venture, along with Weston Solutions, Inc., that owns WTS, the WIPP facility MOC. This notification was submitted to assure compliance with 20.4.1.900 NMAC (incorporating 40 CFR §270.40(b)).
November 26, 2007	The NMED received a Class 1 permit modification requiring prior agency approval in a letter dated November 19, 2007, describing a change of ownership of WTS. On November 15, 2007, WGI was acquired by URS Corporation. WTS is owned jointly by WGES, managing member, and

	Weston Solutions, Inc. WGES, formerly owned by WGI, is now owned by URS Corporation.
October 1, 2012	The NMED received a Class 1 permit modification requiring prior agency approval in a letter dated June 25, 2012 describing a change in the MOC for the WIPP facility. The new MOC for the WIPP facility will be Nuclear Waste Partnership LLC. The new MOC is comprised of URS Energy & Construction, Inc. and Babcock and Wilcox Technical Services Group, Inc.
April 1, 2014	URS announced an organizational realignment to move Global Management and Operational Services Group (GMOS) from URS Energy & Construction to URS Federal Services Division. Nuclear Waste Partnership LLC is part of GMOS and remains in this group. The MOC is comprised of URS Federal Services, Inc. and Babcock and Wilcox Technical Services Group, Inc.
January 5, 2015	On January 5, 2015 URS merged with AECOM. The MOC, Nuclear Waste Partnership LLC, is comprised of URS Energy & Construction, Inc. (an organization within AECOM) and Babcock and Wilcox Technical Services Group, Inc. This merger is therefore not related to a change in operational control because URS Energy & Construction, Inc. continues to be 70% owner of Nuclear Waste Partnership LLC.
July 1, 2015	On June 8, 2015 the Babcock & Wilcox Company announced its intent to change the name to BWXT Technical Services Group, Inc. (BWXT TSG). This change was effective July 1, 2015. No changes are being made to the MOC. The MOC is comprised of URS Energy & Construction, Inc. and BWXT Technical Services Group, Inc.
September 19, 2016	URS Energy & Construction, Inc. changed its name to AECOM Energy & Construction, Inc. This name change was effective September 19, 2016. No changes are being made to the MOC. This is a name change only; there was no change in operational control. The MOC, Nuclear Waste partnership LLC, is comprised of AECOM Energy & Construction, Inc. and BWXT Technical Services Group, Inc. This change does not constitute the required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the Permit to a new operator.
January 31, 2020	Lindsay Goldberg/American Securities purchased AECOM's Management Services group, forming a new company named Amentum. Included in that transaction was AECOM Energy & Construction, Inc., which continues to be the legal guarantor and majority owner of the MOC, Nuclear Waste Partnership LLC. No changes are being made to the MOC. Nuclear Waste Partnership LLC is still comprised of AECOM Energy & Construction, Inc. and BWXT Technical Services Group, Inc. This is a change in ultimate parent company only; there was no change in operational control. Therefore, this change does not constitute the

	required permit modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of the permit to a new operator.
November 22, 2022	The Permittees submitted a Class 1 Permit modification requiring prior agency approval to the NMED describing a change in the MOC for the WIPP facility. The new MOC for the WIPP facility is Salado Isolation Mining Contractors LLC. The new MOC is a single purpose entity comprised of Bechtel National Inc.