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

December 13, 2019  

New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505  

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

Dear Mr. Cobra in:  

Enclosed is a Notification of Class 1 Permit Modification for the following item:  

- Update Department of Energy, Carlsbad Field Office Acting Manager  

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.  

If you have any questions, please contact Mr. Michael R. Brown at (575) 234-7476.  

Sincerely,  

Gregory Sasson  
Acting Manager  
Carlsbad Field Office  

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  

CBFO:OEP:MRB:ER:19-0280:UFC 5487.00
Class 1 Permit Modification Notification

Update Department of Energy, Carlsbad Field Office Acting Manager

Waste Isolation Pilot Plant
Carlsbad, New Mexico

WIPP Permit Number - NM4890139088-TSDF

December 2019
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Transmittal Letter

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<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>CBFO</td>
<td>Carlsbad Field Office</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>DOE</td>
<td>U.S. Department of Energy</td>
</tr>
<tr>
<td>NMAC</td>
<td>New Mexico Administrative Code</td>
</tr>
<tr>
<td>NMED</td>
<td>New Mexico Environment Department</td>
</tr>
<tr>
<td>Permit</td>
<td>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</td>
</tr>
<tr>
<td>Permittees</td>
<td>U.S. Department of Energy and Nuclear Waste Partnership LLC</td>
</tr>
<tr>
<td>PMN</td>
<td>Permit Modification Notification</td>
</tr>
<tr>
<td>WIPP</td>
<td>Waste Isolation Pilot Plant</td>
</tr>
</tbody>
</table>
Overview of the Permit Modification Notification

This document contains a Class 1 Permit Modification Notification (PMN) for the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (Permit) Number NM4890139088-TSDF.

This PMN is 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 PMN in this document is necessary to notify the New Mexico Environment Department (NMED) of changes which impact the Permit. This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modification to the Permit and any related supporting documents are provided in this PMN. The proposed modifications to the text of the Permit have been identified using red text and double underline and a strikeout font for deleted information. All direct quotations are indicated by italicized text.
Attachment A
Description of the Class 1 Permit Modification Notification
<table>
<thead>
<tr>
<th>Item No.</th>
<th>Affected Permit Section</th>
<th>Change Description</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Attachment A, Section A-1, Facility Description Attachment B, Part A-Hazardous Waste Permit Application Part A</td>
<td>This modification revises Attachment A, Section A-1, Facility Description, and Attachment B, Hazardous Waste Permit Application Part A, to change the Acting Manager of the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) from Mr. Kirk D. Lachman to Mr. Gregory Sosson, effective December 9, 2019.</td>
<td>A.1</td>
</tr>
</tbody>
</table>
Item 1

Description

This modification revises Attachment A, Section A-1, Facility Description, and Attachment B, Hazardous Waste Permit Application Part A, to change the Acting Manager of the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) from Mr. Kirk D. Lachman to Mr. Gregory Sosson, effective December 9, 2019.

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

On December 9, 2019, Mr. Kirk D. Lachman was replaced by Mr. Gregory Sosson as the Acting Manager and responsible official for the DOE/CBFO. The revisions to Attachment A, Section A-1, and Attachment B, reflect this change and are necessary as Mr. Sosson is the signatory authority for the DOE/CBFO. Attachment B was updated using the United States Environmental Protection Agency RCRA Hazardous Waste Part A Permit Application Instructions and Form, 8700-23 (OMB# 2050-0024; expires 5/31/2020).
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: Kirk Lachman
Gregory Sossen
Acting 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: 30 miles east of Carlsbad on the Jal Highway, in Eddy County.

TELEPHONE NUMBER: 575/234-7300

U.S. EPA I.D. NUMBER: NM4890139088

GEOGRAPHIC LOCATION: 32° 22' 30” N
103° 47' 30” W

DATE OPERATIONS BEGAN: November 26, 1999
United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (Select only one.)

<table>
<thead>
<tr>
<th>Reason Description</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)</td>
<td></td>
</tr>
<tr>
<td>Submitting as a component of the Hazardous Waste Report for ___________________ (Reporting Year)</td>
<td></td>
</tr>
<tr>
<td>Site was a TSD facility and/or generator of &gt; 1,000 kg of hazardous waste, &gt; 1 kg of acute hazardous waste, or &gt; 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent EQS regulations)</td>
<td></td>
</tr>
<tr>
<td>Notifying that regulated activity is no longer occurring at this Site</td>
<td></td>
</tr>
<tr>
<td>Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities</td>
<td></td>
</tr>
<tr>
<td>Submitting a new or revised Part A Form</td>
<td></td>
</tr>
</tbody>
</table>

2. Site EPA ID Number

<table>
<thead>
<tr>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>N 4 8 9 0 1 3 9 0 8 8</td>
</tr>
</tbody>
</table>

3. Site Name

Waste Isolation Pilot Plant

4. Site Location Address

<table>
<thead>
<tr>
<th>Street Address</th>
<th>City, Town, or Village</th>
<th>County</th>
</tr>
</thead>
<tbody>
<tr>
<td>30 miles east of Carlsbad on Jai Highway</td>
<td>Carlsbad</td>
<td>Eddy</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>State</th>
<th>Country</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>NM</td>
<td>USA</td>
<td>88221</td>
</tr>
</tbody>
</table>

5. Site Mailing Address

<table>
<thead>
<tr>
<th>Street Address</th>
<th>City, Town, or Village</th>
<th>County</th>
</tr>
</thead>
<tbody>
<tr>
<td>P. O. Box 3090</td>
<td>Carlsbad</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>State</th>
<th>Country</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>NM</td>
<td>USA</td>
<td>88221</td>
</tr>
</tbody>
</table>

6. Site Land Type

<table>
<thead>
<tr>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private</td>
</tr>
</tbody>
</table>

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

<table>
<thead>
<tr>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>56221</td>
</tr>
</tbody>
</table>

EPA Form 8700-12, 8700-13 A/B, 8700-23

Page 1 of 8
### 8. Site Contact Information

<table>
<thead>
<tr>
<th>First Name</th>
<th>Gregory</th>
<th>Last Name</th>
<th>Sosson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>Acting Manager, Carlsbad Field Office (CBFO)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Street Address</td>
<td>P.O. Box 3090</td>
<td></td>
<td></td>
</tr>
<tr>
<td>City, Town, or Village</td>
<td>Carlsbad</td>
<td></td>
<td></td>
</tr>
<tr>
<td>State</td>
<td>NM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Country</td>
<td>USA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Zip Code</td>
<td>88221</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:Gregory.Sosson@cbfo.doe.gov">Gregory.Sosson@cbfo.doe.gov</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phone</td>
<td>(575) 234-7300</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 9. Legal Owner and Operator of the Site

#### A. Name of Site's Legal Owner

<table>
<thead>
<tr>
<th>Full Name</th>
<th>U.S. Department of Energy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner Type</td>
<td></td>
</tr>
<tr>
<td>Street Address</td>
<td>P.O. Box 3090</td>
</tr>
<tr>
<td>City, Town, or Village</td>
<td>Carlsbad</td>
</tr>
<tr>
<td>State</td>
<td>NM</td>
</tr>
<tr>
<td>Country</td>
<td>USA</td>
</tr>
<tr>
<td>Zip Code</td>
<td>88221</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:Gregory.Sosson@cbfo.doe.gov">Gregory.Sosson@cbfo.doe.gov</a></td>
</tr>
<tr>
<td>Phone</td>
<td>(575) 234-7300</td>
</tr>
</tbody>
</table>

#### B. Name of Site's Legal Operator

<table>
<thead>
<tr>
<th>Full Name</th>
<th>U.S. Department of Energy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operator Type</td>
<td></td>
</tr>
<tr>
<td>Street Address</td>
<td>P.O. Box 3090</td>
</tr>
<tr>
<td>City, Town, or Village</td>
<td>Carlsbad</td>
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<tr>
<td>State</td>
<td>NM</td>
</tr>
<tr>
<td>Country</td>
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</tr>
<tr>
<td>Phone</td>
<td>(575) 234-7300</td>
</tr>
</tbody>
</table>

Comments: See Item 18, Comments, for additional operator.
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

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. LOG</td>
<td>Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; 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.</td>
</tr>
<tr>
<td>b. SQG</td>
<td>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.</td>
</tr>
<tr>
<td>c. VSQG</td>
<td>Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.</td>
</tr>
</tbody>
</table>

If "Yes" above, indicate other generator activities in 2 and 3, as applicable.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Short-Term Generator</td>
<td>(generates from a short-term or one-time event and not from on-going processes). If &quot;Yes&quot;, provide an explanation in the Comments section.</td>
</tr>
<tr>
<td>3. Mixed Waste (Hazardous and Radioactive) Generator</td>
<td></td>
</tr>
<tr>
<td>4. Treater, Storer or Disposer of Hazardous Waste</td>
<td>Note: A hazardous waste Part B permit is required for these activities.</td>
</tr>
<tr>
<td>5. Receives Hazardous Waste from Off-site</td>
<td></td>
</tr>
<tr>
<td>6. Recycler of Hazardous Waste</td>
<td></td>
</tr>
<tr>
<td>7. Exempt Boiler and/or Industrial Furnace</td>
<td>If &quot;Yes&quot;, mark all that apply.</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Waste Code</th>
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<tbody>
<tr>
<td>D004</td>
</tr>
<tr>
<td>D005</td>
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<td>F006</td>
</tr>
<tr>
<td>F007</td>
</tr>
<tr>
<td>See Item 18</td>
</tr>
</tbody>
</table>

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.
### A. Other Waste Activities

1. **Transporter of Hazardous Waste** — If "Yes", mark all that apply.
   - a. Transporter
   - b. Transfer Facility (at your site)

2. **Underground Injection Control**

3. **United States Importer of Hazardous Waste**

4. **Recognized Trader** — If "Yes", mark all that apply.
   - a. Importer
   - b. Exporter

5. **Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G** — If "Yes", mark all that apply.
   - a. Importer
   - b. Exporter

### B. Universal Waste Activities

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.
   - a. Batteries
   - b. Pesticides
   - c. Mercury containing equipment
   - d. Lamps
   - e. Other (specify)
   - f. Other (specify)
   - g. Other (specify)

2. **Destination Facility for Universal Waste** Note: A hazardous waste permit may be required for this activity.

### C. Used Oil Activities

1. **Used Oil Transporter** — If "Yes", mark all that apply.
   - a. Transporter
   - b. Transfer Facility (at your site)

2. **Used Oil Processor and/or Re-refiner** — If "Yes", mark all that apply.
   - a. Processor
   - b. Re-refiner

3. **Off-Specification Used Oil Burner**

4. **Used Oil Fuel Marketer** — If "Yes", mark all that apply.
   - a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
   - b. Marketer Who First Claims the Used Oil Meets the Specifications
12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

A. Opting into or currently operating under 40 CFR 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.

- College or University
- Teaching Hospital that is owned by or has a formal written affiliation with a college or university
- Non-profit Institute that is owned by or has a formal written affiliation with a college or university

B. Withdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

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.

14. LQG Consolidation of VSQG Hazardous Waste

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 VSQGs hazardous waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

A. LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.

- Central Accumulation Area (CAA) or
- Entire Facility

B. Expected closure date: mm/dd/yyyy

C. Requesting new closure date: mm/dd/yyyy

D. Date closed: mm/dd/yyyy

1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)


A. 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), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.

B. Are you notifying under 40 CFR 260.43(a)(4)(ii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or Intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker

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?
15. Comments (include item number for each comment)

Section 8.B (continued):
Full Name: Nuclear Waste Partnership LLC
Data Became Operator (mm/dd/yyyy): 10/01/2012
Operator Type: Private
Street Address: P.O. Box 2078
City, Town, or Village: Carlsbad
State: NM Country: USA Zip Code: 88221
Email: Sean.Dunagan@wlpp.ws
Phone: (576) 234-7400 Ext: Fax: (576) 234-7048

Section 10.B (continued): F003, P015, P030, P088, P099, P108, P120, U002, U003, U019, U037, U043,
U044, U052, U070, U072, U079, U103, U106, U108, U122, U133, U134, U154, U168, U196,
U208, U210, U220, U228, U238

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 Permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).

<table>
<thead>
<tr>
<th>Signature of legal owner, operator or authorized representative</th>
<th>Date (mm/dd/yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Original Signature on File</td>
<td>12/13/2019</td>
</tr>
<tr>
<td>Printed Name (First, Middle Initial Last)</td>
<td></td>
</tr>
<tr>
<td>Gregory Sasson</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:Gregory.Sasson@cbfo.doe.gov">Gregory.Sasson@cbfo.doe.gov</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature of legal owner, operator or authorized representative</th>
<th>Date (mm/dd/yyyy)</th>
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<td>12/13/2019</td>
</tr>
<tr>
<td>Printed Name (First, Middle Initial Last)</td>
<td></td>
</tr>
<tr>
<td>Sean Dunagan</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:Sean.Dunagan@wlpp.ws">Sean.Dunagan@wlpp.ws</a></td>
</tr>
</tbody>
</table>
1. Facility Permit Contact

<table>
<thead>
<tr>
<th>First Name</th>
<th>Same as Site Contact</th>
<th>Ml</th>
<th>Last Name</th>
</tr>
</thead>
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<table>
<thead>
<tr>
<th>Title</th>
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<table>
<thead>
<tr>
<th>Email</th>
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<table>
<thead>
<tr>
<th>Phone</th>
<th>Ext</th>
<th>Fax</th>
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</table>

2. Facility Permit Contact Mailing Address

<table>
<thead>
<tr>
<th>Street Address</th>
<th>Same as Site Mailing Address</th>
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<tbody>
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<table>
<thead>
<tr>
<th>City, Town, or Village</th>
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<table>
<thead>
<tr>
<th>State</th>
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<th>Zip Code</th>
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3. Facility Existence Date (mm/dd/yyyy)

**05/18/1981**

4. Other Environmental Permits

<table>
<thead>
<tr>
<th>A. Permit Type</th>
<th>B. Permit Number</th>
<th>C. Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>See Permit Attachment B, Appendix B1</td>
</tr>
</tbody>
</table>

5. Nature of Business

The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility which entails receiving, unloading, and transferring radioactive mixed waste from the surface of the site to the underground hazardous waste management units. Waste is emplaced in an underground geologic repository horizon located in a deep-beded salt formation approximately 2,150 feet beneath the surface.

EPA Form 8700-12, 8700-13 A/B, 8700-23
6. Process Codes and Design Capacities

<table>
<thead>
<tr>
<th>Line Number</th>
<th>A. Process Code</th>
<th>B. Process Design Capacity</th>
<th>C. Process Total Number of Units</th>
<th>D. Unit Name</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>(1) Amount</td>
<td>(2) Unit of Measure</td>
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<tr>
<td>1</td>
<td>X</td>
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<td>C</td>
<td>002</td>
</tr>
<tr>
<td>2</td>
<td>X</td>
<td>18750.00</td>
<td>C</td>
<td>001</td>
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<td>X</td>
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<tr>
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<td>X</td>
<td>19195.00</td>
<td>C</td>
<td>001</td>
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</table>


<table>
<thead>
<tr>
<th>Line No.</th>
<th>A. EPA Hazardous Waste No.</th>
<th>B. Estimated Annual Qty of Waste</th>
<th>C. Unit of Measure</th>
<th>D. Processes</th>
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</thead>
<tbody>
<tr>
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<td>10</td>
<td>D 0 0 1 9</td>
<td>761</td>
<td>M</td>
<td>X 0 4 S 0 1 S 0 1</td>
</tr>
</tbody>
</table>

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 springs, 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 8, 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 Gregory Sasson
Title: Acting Manager, Carlsbad Field Office (CBFO)
for: U.S. Department of Energy
Date: 12/13/2019

Co-Operator Signature: Original signed by Sean Dunagan
Title: Project Manager
for: Nuclear Waste Partnership LLC
Date: 12/13/2019