



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

FEB 07 2020

Mr. Kevin Pierard, Chief
Hazardous Waste Bureau
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. Pierard:

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

- Update Chronology in Permit Attachment A

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,

Signatures on file

Grégory Sosson
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

Class 1 Permit Modification Notification
Update Chronology in Permit Attachment A
Waste Isolation Pilot Plant
Carlsbad, New Mexico
WIPP Permit Number - NM4890139088-TSDF

February 2020

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Acronyms, Abbreviations, and Units

CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
MOC	Management and Operating Contractor
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
Permit	Waste Isolation Pilot Plant Hazardous Waste Facility Permit
Permittees	U.S. Department of Energy and Nuclear Waste Partnership LLC
PMN	Permit Modification Notification
WIPP	Waste Isolation Pilot Plant

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 a change which impacts 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 modification to the text of the Permit has 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 1. Class 1 Hazardous Waste Facility Permit Modification Notification

Affected Permit Section	Change Description	Category
Attachment A, Section A-6, <i>Chronology of Events Relevant to Changes in Ownership or Operational Control</i>	This modification updates Permit Attachment A, Section A-6, <i>Chronology of Events Relevant to Changes in Ownership or Operational Control</i> , to reflect a change in ultimate parent company applicable to the Management and Operating Contractor (MOC), Nuclear Waste Partnership LLC, as a result of the sale of AECOM's Management Services group to Lindsay Goldberg/American Securities.	A.1

Item 1

Description

This modification updates Permit Attachment A, Section A-6, *Chronology of Events Relevant to Changes in Ownership or Operational Control*, to reflect a change in ultimate parent company applicable to the Management and Operating Contractor (**MOC**), Nuclear Waste Partnership LLC, as a result of the sale of AECOM's Management Services group to Lindsay Goldberg/American Securities.

Basis

This modification is a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.1, *Administrative and informational changes... 1*).

Discussion

On 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. This change is needed to update the Permit with current information.

Proposed Revised Permit Text

ATTACHMENT A

GENERAL FACILITY DESCRIPTION AND
PROCESS INFORMATION

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

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.