

Department of Energy

Carlsbad Field Office P. O. Box 3090 Carlsbad, New Mexico 88221 November 22, 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 Notification, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF
- Reference: DOE letter CBFO:OBO:DB:KC:22-1210 from Daniel Burke, Contracting Officer, Carlsbad Field Office, to Ms. Dena Volovar, Tularosa Basin Range Services, LLC; Subject: Notice to Proceed – Contract 8903322DEM00077, Waste Isolation Pilot Plant Management and Operating, dated November 8, 2022

Dear Mr. Shean:

Enclosed is a Class 1* Permit Modification Notification (PMN) for the following item:

Change in Operational Control

This PMN is being submitted per Permit Part 1, Section 1.7.12 to address the change in co-operator of the Waste Isolation Pilot Plant (WIPP) facility pursuant to the above-referenced letter. Tularosa Basin Range Services, LLC doing business as Salado Isolation Mining Contractors (SIMCO) will be providing the disclosure forms according to New Mexico Statutes Annotated 74-4-4.7(A). The disclosure forms contain confidential, proprietary, and personal information and are being provided under separate cover directly from Mr. Ken Harrawood, Program Manager, SIMCO, to Mr. Rick Shean, Chief, New Mexico Environment Department Hazardous Waste Bureau.

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 Gerle at (575) 988-5372.

Sincerely,

Signatures on File

Reinhard Knerr Manager Carlsbad Field Office

Enclosure

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

Sean Dunagan President and Project Manager Nuclear Waste Partnership LLC **Class 1* Permit Modification Notification**

Change in Operational Control

Waste Isolation Pilot Plant Carlsbad, New Mexico

WIPP Permit Number - NM4890139088-TSDF

November 2022

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
MOC	Management and Operating Contractor
NMAC NMED	New Mexico Administrative Code New Mexico Environment Department
Permit Permittees PMN	Waste Isolation Pilot Plant Hazardous Waste Facility Permit U.S. Department of Energy and Nuclear Waste Partnership LLC Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
SIMCO	Salado Isolation Mining Contractors LLC
WIPP	Waste Isolation Pilot Plant

Overview of the Permit Modification Notification

This document contains a Class 1 Permit Modification Notification (**PMN**), requiring prior agency approval (i.e., Class 1*), 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)(2)). The PMN in this document is 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 modifications to the Permit and any related supporting documents are provided in this PMN. The modifications to the text of the Permit have been identified using red text and <u>double</u> <u>underline</u> and a strikeout font for deleted information. All direct quotations are indicated by italicized text.

Appendix 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
Permit Part 1, Section 1.2, <i>Effect of</i> <i>Permit</i> Permit Part 1, Section 1.5.4, <i>Permittees</i> Permit Attachment A. Section A 1	This Permit modification is to notify the NMED of a change in the operational control of the WIPP facility from the co-operator Nuclear Waste Partnership LLC to the co-operator Tularosa Basin Range Services, LLC dba Salado Isolation Mining Contractors LLC (SIMCO). The changes are as follows:	A.7
Permit Attachment A, Section A-1, <i>Facility Description</i>	• Permit Part 1, Section 1.2, <i>Effect of Permit</i>	
Permit Attachment A, Section A-6, Chronology of Events Relevant to	 Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC." 	
Changes in Ownership or	• Permit Part 1, Section 1.5.4, Permittees	
Operational Control Permit Attachment B, Hazardous	 Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC." 	
Waste Permit Application Part A	• Permit Attachment A, Section A-1, Facility Description	
	 Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC." 	
	 Changed "Sean Dunagan" to "Ken Harrawood." 	
	 Changed "Project Manager, Nuclear Waste Partnership LLC" to "Program Manager, Salado Isolation Mining Contractors LLC." 	
	 Permit Attachment A, Section A-6, Chronology of Events Relevant to Changes in Ownership or Operational Control 	
	 Added "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." 	
	Permit Attachment B, Hazardous Waste Permit Application Part A	
	 Resource Conservation and Recovery Act (RCRA) Subtitle C Site Identification Form 	
	 Section 18 	
	 Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC." 	
	 Changed "10/01/2012" to "02/06/2023." 	
	 Changed "Sean.Dunagan@wipp.ws" to 	
	"Ken.Harrawood@wipp.ws."	
	 Section 19 Changed "1/31/2022" to "11/22/2022." 	
	 Changed "1/31/2022" to "11/22/2022." 	

Affected Permit Section	Change Description	Category
	 Changed "Sean Dunagan" to "Ken Harrawood." 	
	 Changed "Project Manager, Nuclear Waste Partnership LLC" to "Program Manager, Salado Isolation Mining Contractors LLC." 	
	 Changed "Sean.Dunagan@wipp.ws" to "Ken.Harrawood@wipp.ws." 	
	 RCRA Part A Application Certification 	
	 Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC." 	
	 Changed "1/31/2022" to "11/22/2022." 	
	 Changed "Sean Dunagan" to "Ken Harrawood." 	
	 Changed "Project Manager" to "Program Manager." 	
	 Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC." 	
	 Changed "1/31/2022" to "11/22/2022." 	

Item 1

Description

This Permit modification is to notify the NMED of a change in the operational control of the WIPP facility from the co-operator Nuclear Waste Partnership LLC to the co-operator Tularosa Basin Range Services, LLC dba Salado Isolation Mining Contractors LLC (**SIMCO**). The changes are as follows:

- Permit Part 1, Section 1.2, Effect of Permit
 - Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC."
- Permit Part 1, Section 1.5.4, *Permittees*
 - Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC."
- Permit Attachment A, Section A-1, *Facility Description*
 - Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC."
 - Changed "Sean Dunagan" to "Ken Harrawood."
 - Changed "Project Manager, Nuclear Waste Partnership LLC" to "Program Manager, Salado Isolation Mining Contractors LLC."
- Permit Attachment A, Section A-6, Chronology of Events Relevant to Changes in Ownership or Operational Control
 - Added "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."
- Permit Attachment B, Hazardous Waste Permit Application Part A
 - Resource Conservation and Recovery Act (RCRA) Subtitle C Site Identification Form
 - Section 18
 - Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC."
 - Changed "10/01/2012" to "02/06/2023."
 - Changed "Sean.Dunagan@wipp.ws" to "Ken.Harrawood@wipp.ws."
 - Section 19
 - Changed "1/31/2022" to "11/22/2022."
 - Changed "1/31/2022" to "11/22/2022."
 - Changed "Sean Dunagan" to "Ken Harrawood."
 - Changed "Project Manager, Nuclear Waste Partnership LLC" to "Program Manager, Salado Isolation Mining Contractors LLC."
 - Changed "Sean.Dunagan@wipp.ws" to "Ken.Harrawood@wipp.ws."
 - RCRA Part A Application Certification
 - Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC."
 - Changed "1/31/2022" to "11/22/2022."
 - Changed "Sean Dunagan" to "Ken Harrawood."
 - Changed "Project Manager" to "Program Manager."

- Changed "Nuclear Waste Partnership LLC" to "Salado Isolation Mining Contractors LLC."
- Changed "1/31/2022" to "11/22/2022."

Basis

This change is classified as "Changes in ownership or operational control of a facility, provided the procedures of § 270.40(b) are followed" pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42 Appendix 1, A.7) and is, therefore, a Class 1 modification requiring prior agency approval.

Discussion

This PMN provides NMED with the 90-day notice required by Permit Part 1, Section 1.7.12 as specified in 20.4.1.900 NMAC (incorporating 40 CFR 270.40(b)) regarding a change in the operational control of the WIPP facility. The new Management and Operating Contractor (**MOC**) for the WIPP facility will be SIMCO. The DOE Notice to Proceed for the contract transition was issued on November 8, 2022. Pursuant to this letter, the duration of the Contract Transition Period may be up to 90-days; however, it may be completed sooner subject to the DOE agreeing that all required activities have been accomplished. Therefore, the effective date of the transition may be on or about February 6, 2023. If the Contract Transition Period is completed sooner than 90 days, the Permittees will provide the updated Part A Forms in a separate submittal. The new MOC is a single purpose entity comprised of Bechtel National Inc. The Permittees are providing the signed Part A Forms, certification and written agreement in Appendices B through D.

The changes to the Permit are needed to update the text with new information regarding a change in operational control of the facility.

Revised Permit Text:

PART 1 - GENERAL PERMIT CONDITIONS

1.2 <u>EFFECT OF PERMIT</u>

The Secretary issues this Permit to the United States Department of Energy (**DOE**), the owner and co-operator of the Waste Isolation Pilot Plant (**WIPP**) (EPA I.D. Number NM4890139088), and <u>Salado Isolation Mining Contractors LLCNuclear Waste Partnership LLC</u>, Management and Operating Contractor (**MOC**), the co-operator of WIPP. This Permit authorizes DOE and MOC (**the Permittees**) to manage, store, and dispose contact-handled (**CH**) and remote-handled (**RH**) transuranic (**TRU**) mixed waste at WIPP, and establishes the general and specific standards for these activities, pursuant to the HWA and HWMR.

1.5.4 Permittees

"Permittees" means the United States Department of Energy (**DOE**), an agency of the Federal government, and the owner and co-operator of the WIPP facility; and <u>Salado</u> <u>Isolation Mining Contractors LLCNuclear Waste Partnership LLC</u>, Management and Operating Contractor (**MOC**), the co-operator of the WIPP facility. References to actions taken by "the Permittees" indicate actions that may be taken by either co-Permittee.

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:	Salado Isolation Mining Contractors LLCNuclear Waste Partnership LLC P.O. Box 2078 Carlsbad, NM 88221
RESPONSIBLE OFFICIALS:	Reinhard Knerr Manager, DOE/Carlsbad Field Office <u>Ken Harrawood</u> Sean Dunagan <u>Program Manager, Salado Isolation Mining</u> <u>Contractors LLC</u> Project Manager, Nuclear Waste Partnership 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:	575/234-7300
U.S. EPA I.D. NUMBER:	NM4890139088
GEOGRAPHIC LOCATION: (WGS84)	32.3697706 -103.7913501
DATE OPERATIONS BEGAN:	November 26, 1999

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.
- 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.

ATTACHMENT B HAZARDOUS WASTE PERMIT APPLICATION PART A

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

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

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

2. Site EPA ID Number

Ì	Ν	M	4	8	9	0	1	3	9	0	8	8
			-		_				-	-		

3. Site Name

Waste Isolation Pilot Plant

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 32.36977	06 Longitude -103.7913501	Use Lat/Long as Primary Address

5. Site Mailing Address

Mailing Address				Same as Location Street Address
Street Ad	dress	P.O. Box 3090		
City, Tow	n, or Village	Carlsbad		
State	NM		Country USA	Zip Code 88221

6. Site Land Type

Private Private	County	District	✓ Federal	Tribal	Municipal	State	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	С.
В.	D.

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EPA ID Number N M 4 8	9 0	1 3	9	0	8	8
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Same as Location Address

8. Site Contact Information

First Name Reinhard	st Name Reinhard MI Last Name Knerr							
Title Manager, Carlsbad Field Office (CBFO)								
Street Address P.O. Box 3090								
City, Town, or Village	City, Town, or Village Carlsbad							
State NM	State NM Country USA Zip Code 88221							
Email Reinhard.Knerr@cbfo.doe.gov								
Phone (575) 234-730	Phone (575) 234-7300 Ext Fax (575) 234-7694							

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner	Same as Location Address	
Full Name	Date Became Owner (mm/dd/yyyy)	
U.S. Department of Energy	5/18/1981	
Owner Type Private County District	🗸 - ederal 🛛 Tribal	Municipal State Other
Street Address P.O. Box 3090		
City, Town, or Village Carlsbad		
State NM	Country USA	Zip Code 88221
Email Reinhard.Knerr@cbfo.doe.go	v	
Phone (575) 234-7300	Ext	Fax (575) 234-7694
Comments		

B. Name of Site's Legal Operator		Same as Location Address
Full Name		Date Became Operator (mm/dd/yyyy)
U.S. Department of Energy		5/18/1981
Operator Type Private County District	Federal Tribal	Municipal State Dther
Street Address P.O. Box 3090		
City, Town, or Village Carlsbad		
State NM	Country USA	Zip Code 88221
Email Reinhard.Knerr@cbfo.doe.go	V	
Phone (575) 234-7300	Ext	Fax (575) 234-7694
Comments See Item 18, Comments, for	additional operator.	

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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

ν	ΓN	1. Gen	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c							
			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.						
	b. SQG		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.						
	c. VSQG			Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.						
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. Note: If "Yes", you MUST indic that you are a Generator of Hazardous Waste in Item 10.A.1 above.										
٧			ater, Storer se activities	or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required s.						
٧	٦	4. Rece	ives Hazaro	dous Waste from Off-site						
ΓY	٧Ň	5 Recy	cler of Haza	ardous Waste						
a. Recycler who stores prior to recycling										
	b. Recycler who does not store prior to recycling									
Ľ	٧	6. Exen	npt Boiler a	nd/or Industrial Furnace—If "Yes", mark all that apply.						
			a. Small Q	uantity On-site Burner Exemption						
			b. Smeltin	g, 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.

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

Y VN	Y 🖌 N 1. Transporter of Hazardous Waste—If "Yes", mark all that apply.						
		a. Transporter					
		b. Transfer Facility (at your site)					
Y V 2. Underground Injection Control							
Y VN 3. United States Importer of Hazardous Waste							
Y N 4. Recognized Trader—If "Yes", mark all that apply.							
		a. Importer					
		b. Exporter					
	5. Imp that ap	orter/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark all ply.					
		a. Importer					
		b. Exporter					

B. Universal Waste Activities

□	1. Lar apply.	ge Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that Note: Refer to your State regulations to determine what is regulated.
		a. Batteries
		b. Pesticides
		c. Mercury containing equipment
		d. Lamps
		e. Aerosol Cans
		f. Other (specify)
		g. Other (specify)
Y N	2. D activi1	estination Facility for Universal Waste Note: A hazardous waste permit may be required for this ty.

C. Used Oil Activities

Y V N 1. Use	ed Oil Transporter—If "Yes", mark all that apply.
	a. Transporter
	b. Transfer Facility (at your site)
Y V N 2. Use	ed Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
	a. Processor
	b. Re-refiner
□y ☑ N 3. Off	-Specification Used Oil Burner
□ γ 🗸 N 4. Use	ed 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

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D. Pharmaceutical Activities

cals—	erating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuti- if "Yes", mark only one. Note: See the item-by-item instructions for definitions of healthcare facility everse distributor.							
a. Healthcare Facility								
	b. Reverse Distributor							
pharn	thdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste naceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of nazardous 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.

was	pting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous tes in laboratories— If "Yes", mark all that apply. Note: See the item-by-item instructions for defini- s of types of eligible academic entities.									
1. College or University										
	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university									
	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university									
∏ Y √ N B. 1	I 3. Non-profit institute that is owned by or has a formal written amiliation with a college of university I I I I I I I I I I									

13. Episodic Generation

Y

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.

14. LQG Consolidation of VSQG Hazardous Waste

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.

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

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

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16. Notification of Hazardous Secondary Material (HSM) Activity

Y 🗸 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.

17. Electronic Manifest Broker

\mathbf{V} \mathbf{V} N Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifitem to obtain, complete, and transmit an electronic manifest under a contractual relationship with ardous waste generator?	
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18. Comments (include item number for each comment)

Section 9.B (continued): Full Name: Salado Isolation Mining C Date Became Operator (mm/dd/yyyy Operator Type: Private Street Address: P.O. Box 2078 City, Town, or Village: Carlsbad		
State: NM	Country: USA	Zip Code: 88221
Email: Ken.Harrawood@wipp.ws	-	
Phone: (575) 234-7400	Ext:	Fax: (575) 234-7046
		2106, P120, U002, U003, U019, U037, U043, 122, U133, U134, U151, U154, U159, U196,

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).

Date (mm/dd/yyyy)
11/22/2022
Title
Manager, Carlsbad Field Office (CBFO)
Date (mm/dd/yyyy)
11/22/2022
Title Program Manager, Salado Isolation Mining Contractors LLC

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

Page 6 of 8

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ility Permit Contact		05272.02		611	Tanan						30 301279		
First Name Same as Site Contact MI Title										Last Name			
1000770940100													
Email Phone					Ext						Fax		
ility Permit Contact		10.73											
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City, Town, or Vil	lage		1										
State			Cou	intry							Zip Code		
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OMB# 2050-0024; Expires 04/30/2024

6. Process Codes and Design Capacities

Li	ne	A. F	Process	Code	B. Process De	sign Capacity	C. Process Total	D. Unit Name		
Nun	nber	1.1944			(1) Amount	(2) Unit of Measure	Number of Units			
0	1	Х	0	4	18000.00 C		002	Panels 1 and 2		
0	2	Х	0	4	18750.00	18750.00 C 001		Panel 3		
0	3	Х	0	4	19106.00	С	001	Panel 4		
0	4	Х	0	4	19195.00	19195.00 C		Panel 5		
								See attached		

8 8

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

		A.	A. EPA Hazardous			B. Estimated	C. Unit of							D.	Pro	cesse	s
Line	No.		Wast	e No.		Annual Measure Qty of Waste				(1	L) Pro	ocess	Code		(2) Process Description (if code is not entered in 7.D1))		
0	1	D	0	0	4	903	М	X	0	4	S	0	1	S	0	1	
0	2	D	0	0	5	484	М	X	0	4	S	0	1	S	0	1	
0	3	D	0	0	6	1819	М	Х	0	4	S	0	1	S	0	1	
0	4	D	0	0	7	1248	М	Х	0	4	S	0	1	S	0	1	
0	5	D	0	0	8	3246	М	х	0	4	S	0	1	S	0	1	
0	6	D	0	0	9	1727	М	х	0	4	S	0	1	S	0	1	
0	7	D	0	1	0	186	М	Х	0	4	S	0	1	S	0	1	
0	8	D	0	1	1	1090	М	Х	0	4	S	0	1	S	0	1	
0	9	D	0	1	8	749	М	Х	0	4	S	0	1	S	0	1	
1	0	D	0	1	9	761	М	Х	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.

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Same as Location Street Address

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

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

2. Site EPA ID Number

N	М	4	8	9	0	1	3	9	0	8	8
		-	_		-		-	_	-	_	

3. Site Name

Waste Isolation Pilot Plant

4. Site Location Address

Street Address 34 Louis		s Whitlock Road	hitlock Road									
City, Tow	n, or Village Carlsba	d	County Eddy									
State	NM	Country USA	Zip Code 88220									
Latitude	32.3697706	Longitude -103.7913501	Use Lat/Long as Primary Address									

5. Site Mailing Address

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

6. Site Land Type

Private	County	District	Federal	Tribal	Municipal	State	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.
В.	D.

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

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Contact Information		Same a	s Location Address				
First Name Reinhard	MI	Last Name Knerr					
Title Manager, Ca	arlsbad Field Office (CBFO)						
Street Address P.O. Box 30	90						
City, Town, or Village Carlsbad			3				
State NM	Country USA	Zip Code 88221	8				
Email Reinhard.Knerr@cbfo.doe	.gov						
Phone (575) 234-7300	Ext	Fax (575) 234-7694					
al Owner and Operator of the Site A. Name of Site's Legal Owner Full Name		Same a Date Became Owner	s Location Address (mm/dd/yyyy)				
U.S. Department of Energy		5/18/1981					
Owner Type Private County Distric Street Address P.O. Box 309		Municipal State	e Dther				
City, Town, or Village Carlsbad							
	The second se						
Chate Alle	Country wasa	Zin Code pages					
Email Reinhard.Knerr@cbfo.doe	Agov	Zie Code BBBBS					
Email Reinhard.Knerr@cbfo.doe Phone (575) 234-7300	e.gov Ext	Fax (575) 234-7	694				
		Fax (575) 234-7	694				
Phone (575) 234-7300		Same a	is Location Address				
Phone (575) 234-7300 Comments			is Location Address				
Phone (575) 234-7300 Comments B. Name of Site's Legal Operator Full Name	Ext	Date Became Operat	is Location Address or (mm/dd/yyyy)				
Phone (575) 234-7300 Comments B. Name of Site's Legal Operator Full Name U.S. Department of Energy Operator Type	Ext :t Vederal Tribal	Date Became Operat 5/18/1981	is Location Address or (mm/dd/yyyy)				
Phone (575) 234-7300 Comments B. Name of Site's Legal Operator Full Name U.S. Department of Energy Operator Type Private County Distric	Ext :t Vederal Tribal	Date Became Operat 5/18/1981	is Location Address or (mm/dd/yyyy)				
Phone (575) 234-7300 Comments B. Name of Site's Legal Operator Full Name U.S. Department of Energy Operator Type Private ☐County ☐Districe Street Address P.O. Box 303	Ext :t Vederal Tribal	Date Became Operat 5/18/1981	is Location Address or (mm/dd/yyyy)				
Phone (575) 234-7300 Comments B. Name of Site's Legal Operator Full Name U.S. Department of Energy Operator Type Private County District Street Address P.O. Box 309 City, Town, or Village Carlsbad	Ext :t deral Tribal 90 Country USA	Date Became Operat 5/18/1981	is Location Address or (mm/dd/yyyy)				

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EDA ID Number	N	R.I.	4	•	0	0	1	2	0	0	0	0	OMB# 2050-0024; Expi
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res 04/30/2024

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

1. Ger	enerator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c								
V	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.							
	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.							
	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.							
proces	ses). If "Ye	enerator (generates from a short-term or one-time event and not from on-going es", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate</i> nerator of Hazardous Waste in Item 10.A.1 above.							
	ater, Storer se activitie	r or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required s.							
4. Rece	eives Hazar	dous Waste from Off-site							
5 Recy	cler of Haz	ardous Waste							
	а. кесуск	er who stores phor to recycling							
	b. Recycle	er who does not store prior to recycling							
6. Exer	mpt Boiler a	and/or Industrial Furnace—If "Yes", mark all that apply.							
	a. Small C	Quantity On-site Burner Exemption							
	b. Smeltir	ng, 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.

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EPA ID Number	N	М	4	8	9	0	1	3	9	0	8	8
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11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.) A. Other Waste Activities

	1. Transporter of Hazardous Waste—If "Yes", mark all that apply.
	a. Transporter
	b. Transfer Facility (at your site)
Y VN	2. Underground Injection Control
YVN	3. United States Importer of Hazardous Waste
	4. Recognized Trader—If "Yes", mark all that apply.
	a. Importer
	b. Exporter
Y Ø N	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

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

C. Used Oil Activities

Y N 1. Use	ed Oil Transporter—If "Yes", mark all that apply.
	a. Transporter
	b. Transfer Facility (at your site)
Y V N 2. Use	ed Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
	a. Processor
	b. Re-refiner
Y V N 3. Off	-Specification Used Oil Burner
Y V N 4. Use	ed 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

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D. Pharmaceutical Activities

N 1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceu cals—if "Yes", mark only one. Note: See the item-by-item instructions for definitions of healthcare and reverse distributor.									
	a. Healthcare Facility								
	b. Reverse Distributor								
phar	ithdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste maceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of 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.

Dy Øn	N A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of wastes in laboratories— If "Yes", mark all that apply. Note: See the item-by-item instructions tions of types of eligible academic entities.										
		1. College or University									
		2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university									
		3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university									
Y VN	B. W	ithdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.									

13. Episodic Generation VN

TY.

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 VSQG VN hazardous waste.

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

	QG Site Closure of a 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)
Ī	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

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press and	on of Hazard	lous Seco	ndary N	lateria	al (HSN	Act	ivity			
	hazardo	ous secon	dary ma	terial	under	40 CF	R 260	30, 4	0 CFR	anaging, are managing, or will stop managing 261.4(a)(23), (24), (25), or (27)? If "Yes", you or Managing Hazardous Secondary Material.
Electronic	Manifest Br	oker								
	tem to		mplete,	and t						electing to use the EPA electronic manifest sys- st under a contractual relationship with a haz-
Comments	(include ite	em numbe	er for ea	ch co	mmen	t)				
City, To State: N Email: S	ddress: P wn, or Vill M Sean.Duna (575) 234-1	age: Car gan@wi	lsbad pp.ws	2015,	Cour Ext: P030					Zip Code: 88221 Fax: (575) 234-7046 P120, U002, U003, U019, U037, U043,
U044, U		, U072, U	078, U							U133, U134, U151, U154, U159, U196,
U044, U U209, U Certificati rvision in ac bmitted. Bas ing the infor vare that the	on I certify cordance wised on my ir mation, the ere are signi- tions. Note:	, U072, U , U226, U under per ith a syste nquiry of t informat ficant per For the F	halty of l malty of l m desig he perso ion subn	aw th ned to on or nitted	u103, nat this o assur person is, to t mitting	docur e that s who he be false	ment t quali st of r inforr	and a fied page the ny kn	II attao berson ne syst owled n, incl	

Date (mm/dd/yyyy) 1/31/2022
Title Manager, Carlsbad Field Office (CBFO)
Date (mm/dd/yyyy) 1/31/2022
Title Project Manager, Nuclear Waste Partnership

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

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acility Permit Conta	ict													
First Name	Same a	s Sit	e Cont	tact	M						Last Name			
Title											3			
Email														
Phone					Ext	į.					Fax			
Street Address		10	ldress as Sit	te Mai	iling A	ddre	ss							
City, Town, or	Village		12											
State			Co	untry							Zip Code			
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6. Process Codes and Design Capacities

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

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

		A.	EPA H	azard	ous	B. Estimated	C. Unit of	D. Processes									
Lin	e No.		W ast	e No.		Annual Qty of Waste	Measure		(1) Process Codes			(2) Process Description (if code is not entered in 7.D1))					
0	1	D	0	0	4	903	M	Х	0	4	S	0	1	S	0	1	4
0	2	D	0	0	5	484	M	Х	0	4	S	0	1	s	0	1	Te-
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	Х	0	4	s	0	1	S	0	1	
0	5	D	0	0	8	3246	M	Х	0	4	S	0	1	s	0	1	
0	6	D	0	0	9	1727	M	Х	0	4	s	0	1	s	0	1	
0	7	D	0	1	0	186	M	Х	0	4	S	0	1	S	0	1	
0	8	D	0	1	1	1090	M	Х	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	х	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.

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RCRA PART A APPLICATION CERTIFICATION

The U.S. Department of Energy (DOE), through its Carlsbad Field Office, has signed as "owner and operator," and <u>Salado Isolation Mining Contractors LLC</u>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 Sig	nature:	Original signed by Reinhard Knerr
	Title:	Manager, Carlsbad Field Office (CBFO)
	for:	U.S. Department of Energy
	Date:	<u>11/22/2022</u> 1/31/2022
Co-Operator Signature:		Original signed by <u>Ken Harrawood</u> Sean Dunagan
-	Title:	Program ManagerProject Manager
	for:	Salado Isolation Mining Contractors LLC Nuclear Waste
		Partnership LLC
	Date:	11/22/2022 1/31/2022

Appendix B Part A Forms

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
	Submitting as a component of the Hazardous Waste Report for (Reporting Year)
	Site was a TSD facility, a reverse distributor, and/or generator of ≥ 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
	Notifying that regulated activity is no longer occurring at this Site
	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
1	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
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3. Site Name

Waste Isolation Pilot Plant

4. Site Location Address

Street Address 34 Loui		s Whitlock Road	
City, Town,	, or Village Carlsba	d	County Eddy
State	NM	Country USA	Zip Code 88220
Latitude	32.3697706	Longitude -103.7913501	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		
State NM		Country USA	Zip Code 88221

6. Site Land Type

Private	County	District	Federal	Tribal	Municipal	State	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.
В.	D.

EPA ID	Number
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8.

9.

NM

4 8 9 0 1 3 9 0 8 8

Contact Information		Same as Location Add
First Name Reinhard	MI	Last Name Knerr
Title Manager, Car	sbad Field Office (CBFO)	
Street Address P.O. Box 3090		
City, Town, or Village Carlsbad		
State NM	Country USA	Zip Code 88221
Email Reinhard.Knerr@cbfo.doe.g	ov	•
Phone (575) 234-7300	Ext	Fax (575) 234-7694
Owner and Operator of the Site A. Name of Site's Legal Owner Full Name U.S. Department of Energy		Date Became Owner (mm/dd/yyyy) 5/18/1981
Owner Type Private County District	Federal Tribal	Municipal State Other
Street Address P.O. Box 3090		
City, Town, or Village Carlsbad		
State NM	Country USA	Zip Code 88221
Email Reinhard.Knerr@cbfo.doe.g	jov	
Phone (575) 234-7300	Ext	Fax (575) 234-7694
Comments		
B. Name of Site's Legal Operator		Same as Location Add
Full Name U.S. Department of Energy		Date Became Operator (mm/dd/yyy 5/18/1981
erer Boparanerer Energy		
Operator Type Private County District	ederal Tribal	Municipal State Other
Operator Type		Municipal State Other
Operator Type Private County District		Municipal State Other
Operator Type Private County District Street Address P.O. Box 3090		Municipal State Other
Operator Type Private County District Street Address P.O. Box 3090 City, Town, or Village Carlsbad	Country USA	

EPA ID Number	Ν	Μ	4	8	9	0	1	3	9
	1.								

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.

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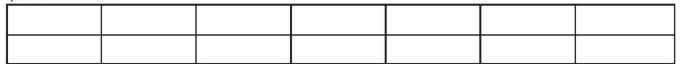
A. Hazardous Waste Activities

ν	N	1. Gen	erator of H	azardous Waste—If "Yes", mark only one of the following—a, b, c						
			a. LQG	 -Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-aculhazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/m (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/ (220 lb/mo) of acute hazardous spill cleanup material. 						
	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.						
			c. <mark>VSQG</mark>	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.						
D	2. Short-Term Generator (generates from a short-term or one-time event and not from on-go processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MU that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>									
√ Y	N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is require for these activities.								
V	ΠN	4. Rece	eives <mark>H</mark> azaro	dous Waste from Off-site						
	٧	ardous Waste								
			a. Recycle	r who stores prior to recycling						
			b. Recycle	r who does not store prior to recycling						
V	ν	6. Exen	npt Boiler a	nd/or Industrial Furnace—If "Yes", mark all that apply.						
			a. Small Q	uantity On-site Burner Exemption						
			b. Smeltin	g, 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.



E	P/	41	D	N	u	m	b	er

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

Y VN	1. Transporter of Hazardous Waste—If "Yes", mark all that apply.						
	a. Transporter						
	b. Transfer Facility (at your site)						
Y VN 2. Underground Injection Control							
Y VN	3. United States Importer of Hazardous Waste						
Y VN	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 hat apply.						
	a. Importer						
	b. Exporter						

B. Universal Waste Activities

	a. Batteries
Γ	b. Pesticides
[c. Mercury containing equipment
]	d. Lamps
	e. Aerosol Cans
	f. Other (specify)
	g. Other (specify)

C. Used Oil Activities

Y N 1. U	sed Oil Transporter—If "Yes", mark all that apply.
	a. Transporter
	b. Transfer Facility (at your site)
Y √N 2. U	sed Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
	a. Processor
	b. Re-refiner
Y ✓ N 3.0	ff-Specification Used Oil Burner
Y ✓ N 4. U	sed 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

EPA ID Number	Ν	М	4	8	9	0	1	3	9	0	8	8	0
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D. Pharmaceutical Activities

⊡r Øn	cals-	erating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuti- if "Yes", mark only one. Note: See the item-by-item instructions for definitions of healthcare facility everse distributor.
		a. Healthcare Facility
		b. Reverse Distributor
<u> </u>	pharn	thdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste naceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of nazardous 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.

∏y √ n	wast	oting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous es in laboratories— If "Yes", mark all that apply. Note: See the item-by-item instructions for defini- of types of eligible academic entities.
		1. College or University
		2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
		3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
LY √N	B. W	ithdrawing from 40 CFR Part 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 VSQG hazardous waste.

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

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

EPA ID	Number
	Humber

4 8 9 0 1 3 9 0 8 8	4	8	9	0	1	3	9	0	8	8
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16. Notification of Hazardous Secondary Material (HSM) Activity

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.

17. Electronic Manifest Broker

N

M

7N	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 haz-
_	tem to obtain, complete, and transmit an electronic manifest under a contractual relationship with a haz-
	ardous waste generator?

18. Comments (include item number for each comment)

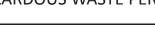
Section 9.B (continued): Full Name: Salado Isolation Mining Contractors LLC Date Became Operator (mm/dd/yyyy): 02/06/2023 Operator Type: Private Street Address: P.O. Box 2078 City, Town, or Village: Carlsbad								
State: NM	Country: USA	Zip Code: 88221						
Email: Ken.Harrawood@wipp.ws								
Phone: (575) 234-7400	Ext:	Fax: (575) 234-7046						
Section 10.B (continued): F009, P015 U044, U052, U070, U072, U078, U079, U209, U210, U220, U226, U228, U239								

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).

Date (mm/dd/yyyy) 11/22/2022				
Title Manager, Carlsbad Field Office (CBFO)				
Date (mm/dd/yyyy) 11/22/2022				
Title Program Manager, Salado Isolation Mining Contractors LLC				

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM



1. Facility Permit Contact

First Name	Same as Site Contact	MI	Last Name			
Title						
Email						
Phone		Ext	Fax			

2. Facility Permit Contact Mailing Address

Μ

Street Address Same as Site Mailing Address								
City, Town, or Village								
State	Country	Zip Code						

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

5/18/1981

4. Other Environmental Permits

A. Permit Type		B. Permit Number										C. Description	
	Sec				See Permit Attachment B, Appendix B1								

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

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

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

Line No.		А.		azard e No.	ous	B. Estimated Annual	C. Unit of Measure										
						Qty of Waste	(1) Process Codes								(if code is not entered in 7.D1))		
0	1	D	0	0	4	903	М	Х	0	4	S	0	1	S	0	1	
0	2	D	0	0	5	484	М	X	0	4	S	0	1	S	0	1	
0	3	D	0	0	6	1819	М	X	0	4	S	0	1	S	0	1	
0	4	D	0	0	7	1248	М	Χ	0	4	S	0	1	S	0	1	
0	5	D	0	0	8	3246	М	Х	0	4	S	0	1	S	0	1	
0	6	D	0	0	9	1727	М	X	0	4	S	0	1	S	0	1	
0	7	D	0	1	0	186	М	X	0	4	S	0	1	S	0	1	
0	8	D	0	1	1	1090	М	Χ	0	4	S	0	1	S	0	1	
0	9	D	0	1	8	749	М	Х	0	4	S	0	1	S	0	1	
1	0	D	0	1	9	761	М	Χ	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.

Appendix C Certification

NM4890139088

RCRA PART A APPLICATION CERTIFICATION

The U.S. Department of Energy (DOE), through its Carlsbad Field Office, has signed as "owner and operator," and Salado Isolation Mining Contractors 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.

ture: Original Signature on File	
for: U.S. Department of Energy	_
Date: <u>11/22/2022</u>	_
Original Signature on File	
Title: Program Manager	
for: Salado Isolation Mining Contractors LLC	
Date: <u>11/22/2022</u>	
E	for: U.S. Department of Energy Date: 11/22/2022 Original Signature on File Title: Program Manager for: Salado Isolation Mining Contractors LLC

Appendix D Written Agreement Containing a Specific Date for Transfer of Permit Responsibilities between the Current and New Permittees as Required By 20.4.1.900 NMAC (Incorporating 40 CFR 270.40(b))

AGREEMENT FOR TRANSFER OF HAZARDOUS WASTE FACILITY PERMIT RESPONSIBILITIES

WHEREAS, the New Mexico Environment Department (NMED) issued a Hazardous Waste Facility Permit (No. NM4890139088) (Permit) to the U.S. Department of Energy (DOE) and Nuclear Waste Partnership, LLC (NWP) for the management, storage, and disposal of transuranic mixed waste at the Waste Isolation Pilot Plant (WIPP), Carlsbad, New Mexico;

WHEREAS, DOE is the owner and co-operator of WIPP under the Permit; and NWP is the co-operator under the Permit (jointly Permittees);

WHEREAS, DOE awarded a Management and Operating Contract to Salado Isolation Mining Contractors LLC (SIMCO), effective February 6, 2023, at which time SIMCO will become responsible for the management and operation of the WIPP which is regulated under the Permit;

WHEREAS, the Permittees requested NMED approval to modify the Permit as necessary to transfer operational control and responsibilities from NWP to the new co-operator and permittee SIMCO for the WIPP;

WHEREAS, 20.4.1.900 NMAC (incorporating 40 CFR §270.40(b), Transfer of Permits) requires the submittal to the NMED of a written agreement containing the specific date for transfer of permit responsibilities between the existing permittees (DOE and NWP) and the new co-operator and permittee SIMCO;

NOW THEREFORE, in consideration of the above and in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.40(b)), DOE, NWP and SIMCO agree as follows:

Effective February 6, 2023, applicable Permit responsibilities to manage and operate the WIPP will transfer from NWP to SIMCO.

By:	Original Signature on File		Date:	11/22/2022	
	Reinhard Knerr	-		-	
	Manager				
	Carlsbad Field Office				
	U.S. Department of Energy				
By:	Original Signature on File	,	Date:	11/22/2022	
	Sean Dunagan				
	President and Project Manager				
	Nuclear Waste Partnership LLC				
By:	Original Signature on File		Date:	11/22/2022	
	Ken Harrawood				
	Program Manager				
	Salado Isolation Mining Contractors LLC				