



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

Mr. JohnDavid Nance, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Class 1 Permit Modification Notification, Waste Isolation Pilot Plant Hazardous
Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Nance:

The purpose of this letter is to provide you with the Class 1 Permit Modification
Notification for the following items:

- Update Underground Escape and Evacuation Map in Permit Attachment D;
- Update Program Manager's email address in Permit Attachment B;
- Revise Acceptable Knowledge Summary Report Information in Permit Attachments C3 and C6; and
- Revise Footnote H in Table E-1 in Permit Attachment E.

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.

Mr. Michael Gerle, Director, Environmental Regulatory Compliance Division, is your point of contact regarding any questions. Mr. Gerle can be reached at (575) 988-5372.

Sincerely,

Signatures on file

Mark Bollinger
Manager
Carlsbad Field Office

Ken Harrawood
Program Manager
Salado Isolation Mining Contractors, LLC

Enclosure

Mr. JohnDavid Nance

-2-

cc: w/enclosure

| | |
|----------------------|-----|
| A. Donahue, NMED | *ED |
| R. Maestas, NMED | ED |
| M. McLean, NMED | ED |
| B. Forinash, CBFO | ED |
| G. Basabilvazo, CBFO | ED |
| M. Gerle, CBFO | ED |
| Z. Lepchitz, CBFO | ED |
| M. Navarrete, CBFO | ED |
| A. Ward, CBFO | ED |
| J. Adkins, CBFO | ED |
| R. Chavez, SIMCO | ED |
| R. Flynn, SIMCO | ED |
| M. Gonzales, SIMCO | ED |
| M. Jones, SIMCO | ED |
| R. Salness, SIMCO | ED |
| J. Settle, SIMCO | ED |
| S. Strong, SIMCO | ED |
| A. Trujillo, SIMCO | ED |
| A. Waldram, SIMCO | ED |
| N. Chavez, LATA | ED |
| M. Cook, LATA | ED |
| D. Ganaway, LATA | ED |
| J. Haschets, LATA | ED |
| M. Lunsford, LATA | ED |
| M. Serrano, LATA | ED |
| K. Barnhart, EFS | ED |
| N. Chavez, LATA | ED |
| R. Chavez LATA | ED |
| J. Haschets, LATA | ED |
| J. Nelson, LATA | ED |
| E. Dominguez, LATA | ED |
| K. Urquidez, LATA | ED |
| E, Bhakta, SIMCO | ED |
| B. St. John, SIMCO | ED |
| A. Waldram, SIMCO | ED |

*ED denotes electronic distribution

Class 1 Permit Modification Notifications

- 1. Update Underground Escape and Evacuation Map in Permit Attachment D**
- 2. Update Program Manager's Email Address in Permit Attachment B**
- 3. Revise Acceptable Knowledge Summary Report Information in Permit Attachments C3 and C6**
- 4. Revise Footnote H in Table E-1 in Permit Attachment E**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP Permit Number - NM4890139088-TSDF

December 2024

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Acronyms and Abbreviations

| | |
|------------|---|
| AKSR | Acceptable Knowledge Summary Report |
| 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 Salado Isolation Mining Contractors LLC |
| PMN | Permit Modification Notification |
| WAP | Waste Analysis Plan |
| WIPP | Waste Isolation Pilot Plant |
| WSPF | Waste Stream Profile Form |
| TRAMPAC | TRUPACT-II Authorized Methods for Payload Control |
| TRUCON | TRU Waste Content |
| TRU | Transuranic |
| UG | Underground |

Overview of the Permit Modification Notification

This document contains Class 1 Permit Modification Notifications (**PMNs**) for the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit (**Permit**) Number NM4890139088-TSDF.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Salado Isolation Mining Contractors 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)). These PMNs are 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 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 Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

| Item No. | Affected Permit Section | Change Description | Category |
|----------|--|---|----------|
| 1 | Attachment D, Figure D-3, <i>Underground Escape and Evacuation Map</i> | This modification replaces the current Underground Escape and Evacuation Map to reflect updates for Panel 11 mining activities, Panel 8 waste emplacement progress, and subsequent symbology updates. | A.1 |
| 2 | Attachment B, <i>Hazardous Waste Permit Application Part A</i> | This modification revises text in Permit Attachment B, Hazardous Waste Permit Application Part A, to update the Program Manager's email address in the RCRA Subtitle C Site Identification Form. | A.1 |
| 3 | Attachment C3, <i>Quality Assurance Objectives and Data Validation Techniques for Waste Characterization Methods</i> Attachment C6, <i>Audit and Surveillance Program</i> | This modification revises Permit text to remove redundancy in the Acceptable Knowledge Summary Report pertaining to TRUCON Codes. | A.1 |
| 4 | Attachment E, Table E-1, <i>Inspection Schedule/Procedures</i> | This modification revises Permit text to address equipment inspections for inaccessible areas. | A.1 |

Item 1

Description

Permit Attachment D is updated with the following changes:

- Permit Attachment D, *RCRA Contingency Plan*
 - Figure D-3, *Underground Escape and Evacuation Map*
 - Replaces this figure with the most recent revision

Basis

This 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

This modification replaces the current Underground Escape and Evacuation Map to depict Panel 11 mining updates, Panel 8 waste emplacement progress, and subsequent symbology updates. This map also, depicts the temporary Underground (**UG**) Assembly Area relocation, and the UG Miner’s First Aid Station, relocated from the Salt Shaft bottom to the new assembly area near the Air Intake Shaft bottom. These changes are needed to update Figure D-3 to depict the current underground configuration, and including temporary changes needed for the UG salt pocket upgrades.

Revised Permit Text:

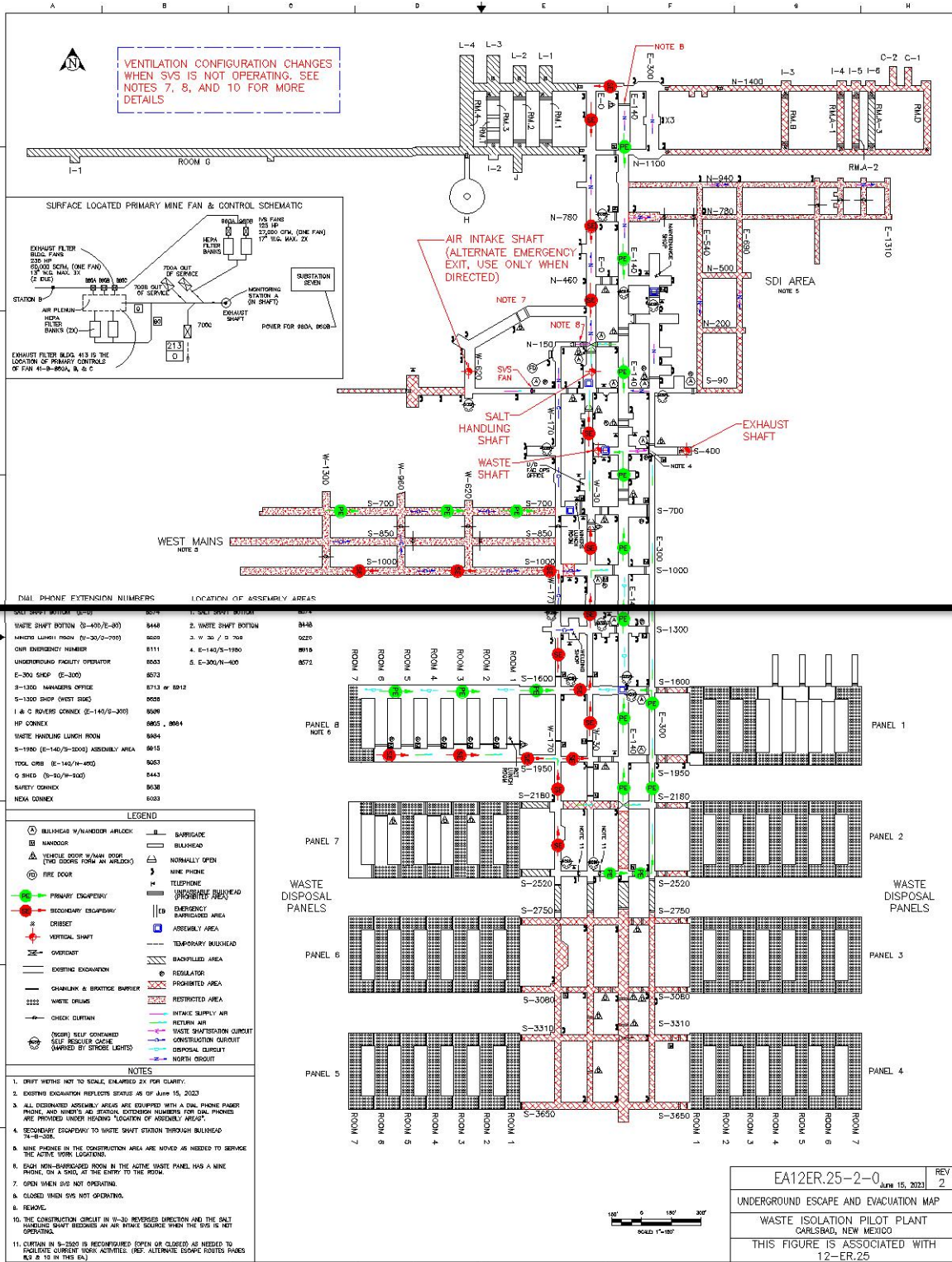


Figure D-3
Underground Escape and Evacuation Map

Item 2

Description

This modification revises text in Permit Attachment B, *Hazardous Waste Permit Application Part A* to update the Program Manager's email address. Permit Attachment B, RCRA Subtitle C Site Identification Form therein is updated with the following changes:

- Permit Attachment B, *Hazardous Waste Permit Application Part A*
 - Section 18
 - Replaces "Ken.Harrawood@wipp.ws" with "Ken.Harrawood@wipp.doe.gov"
 - Section 19
 - Replaces "Ken.Harrawood@wipp.ws" with "Ken.Harrawood@wipp.doe.gov"

Basis

This change is classified as "Administrative and informational changes..." pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42 Appendix I, A.1) and is, therefore, a Class 1 Permit modification.

Discussion


The change to the Permit text is needed to update the email address for the Project Manager of the WIPP facility in Permit Attachment B. This change is needed because the email domain is migrating from "wipp.ws" to "wipp.doe.gov".

Revised Permit Text:

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.)

| | |
|-------------------------------------|---|
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time. |
| <input type="checkbox"/> | Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year) |
| <input type="checkbox"/> | Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ 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) |
| <input type="checkbox"/> | Notifying that regulated activity is no longer occurring at this Site |
| <input type="checkbox"/> | Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities |
| <input checked="" type="checkbox"/> | 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 |
|---|---|---|---|---|---|---|---|---|---|---|---|

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 | 32.3697706 | Longitude | -103.7913501 |
| | | <input type="checkbox"/> | 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

| | | | | | | | |
|----------------------------------|---------------------------------|-----------------------------------|---|---------------------------------|------------------------------------|--------------------------------|--------------------------------|
| <input type="checkbox"/> Private | <input type="checkbox"/> County | <input type="checkbox"/> District | <input checked="" type="checkbox"/> Federal | <input type="checkbox"/> Tribal | <input type="checkbox"/> Municipal | <input type="checkbox"/> State | <input type="checkbox"/> Other |
|----------------------------------|---------------------------------|-----------------------------------|---|---------------------------------|------------------------------------|--------------------------------|--------------------------------|

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

| | | | |
|--------------|-------|----|--|
| A. (Primary) | 56221 | C. | |
| B. | | D. | |

8. Site Contact Information

Same as Location Address

| | | |
|--|--------------------|----------------------------|
| First Name Mark | MI | Last Name Bollinger |
| Title Manager, Carlsbad Field Office (CBFO) | | |
| Street Address P.O. Box 3090 | | |
| City, Town, or Village Carlsbad | | |
| State NM | Country USA | Zip Code 88221 |
| Email Mark.Bollinger@cbfo.doe.gov | | |
| Phone (575) 243-4432 | Ext | Fax |

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

Same as Location Address

| | |
|---|--|
| Full Name U.S. Department of Energy | Date Became Owner (mm/dd/yyyy) 5/18/1981 |
| Owner Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | |
| Street Address P.O. Box 3090 | |
| City, Town, or Village Carlsbad | |
| State NM | Country USA Zip Code 88221 |
| Email Mark.Bollinger@cbfo.doe.gov | |
| Phone (575) 243-4432 | Ext Fax |
| Comments | |

B. Name of Site's Legal Operator

Same as Location Address

| | |
|--|---|
| Full Name U.S. Department of Energy | Date Became Operator (mm/dd/yyyy) 5/18/1981 |
| Operator Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | |
| Street Address P.O. Box 3090 | |
| City, Town, or Village Carlsbad | |
| State NM | Country USA Zip Code 88221 |
| Email Mark.Bollinger@cbfo.doe.gov | |
| Phone (575) 243-4432 | Ext Fax |
| 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

| | | |
|--|---|--|
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | 1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c | |
| <input checked="" type="checkbox"/> | 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. |
| <input type="checkbox"/> | 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. |
| <input type="checkbox"/> | c. VSQG | Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste. |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 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. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i> | |
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | 3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities. | |
| <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | 4. Receives Hazardous Waste from Off-site | |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 5. Recycler of Hazardous Waste | |
| <input type="checkbox"/> | a. Recycler who stores prior to recycling | |
| <input type="checkbox"/> | b. Recycler who does not store prior to recycling | |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply. | |
| <input type="checkbox"/> | a. Small Quantity On-site Burner Exemption | |
| <input type="checkbox"/> | b. Smelting, 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.

| | | | | | | |
|--|--|--|--|--|--|--|
| | | | | | | |
| | | | | | | |

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

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Transporter of Hazardous Waste—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Transporter |
| <input type="checkbox"/> | b. Transfer Facility (at your site) |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Underground Injection Control |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 3. United States Importer of Hazardous Waste |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 4. Recognized Trader—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Importer |
| <input type="checkbox"/> | b. Exporter |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Importer |
| <input type="checkbox"/> | b. Exporter |

B. Universal Waste Activities

| | |
|--|--|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 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. |
| <input type="checkbox"/> | a. Batteries |
| <input type="checkbox"/> | b. Pesticides |
| <input type="checkbox"/> | c. Mercury containing equipment |
| <input type="checkbox"/> | d. Lamps |
| <input type="checkbox"/> | e. Aerosol Cans |
| <input type="checkbox"/> | f. Other (specify) _____ |
| <input type="checkbox"/> | g. Other (specify) _____ |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity. |

C. Used Oil Activities

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Used Oil Transporter—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Transporter |
| <input type="checkbox"/> | b. Transfer Facility (at your site) |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Processor |
| <input type="checkbox"/> | b. Re-refiner |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 3. Off-Specification Used Oil Burner |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 4. Used Oil Fuel Marketer—If “Yes”, mark all that apply. |
| <input type="checkbox"/> | a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner |
| <input type="checkbox"/> | b. Marketer Who First Claims the Used Oil Meets the Specifications |

D. Pharmaceutical Activities

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor. |
| <input type="checkbox"/> | a. Healthcare Facility |
| <input type="checkbox"/> | b. Reverse Distributor |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | 2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous 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.

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | A. Opting into or currently operating under 40 CFR Part 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. |
| <input type="checkbox"/> | 1. College or University |
| <input type="checkbox"/> | 2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university |
| <input type="checkbox"/> | 3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university |
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories. |

13. Episodic Generation

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> 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

| | |
|--|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> 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)

| | |
|---|---|
| <input type="checkbox"/> Y <input checked="" type="checkbox"/> N | LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility. |
| A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility | |
| B. Expected closure date: _____ mm/dd/yyyy | |
| C. Requesting new closure date: _____ mm/dd/yyyy | |
| D. Date closed : _____ mm/dd/yyyy | |
| <input type="checkbox"/> | 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) |
| <input type="checkbox"/> | 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8) |

16. Notification of Hazardous Secondary Material (HSM) Activity

| | | |
|----------------------------|---------------------------------------|---|
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> 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

| | | |
|----------------------------|---------------------------------------|--|
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N | 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? |
|----------------------------|---------------------------------------|--|


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): 02/04/2023
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.doe.gov
Phone: (575) 234-7400 **Ext:** **Fax:** (575) 234-7046

Section 10.B (continued): F009, P015, P030, P098, P099, P106, P120, U002, U003, U019, U037, U043, U044, U052, U070, U072, U078, U079, U103, U105, U108, U122, U133, U134, U151, U154, U159, U196, 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).**

| | |
|--|--|
| Signature of legal owner, operator or authorized representative Original Signature on File | Date (mm/dd/yyyy) 12/19/2024 |
| Printed Name (First, Middle Initial Last) Mark Bollinger | Title Manager, Carlsbad Field Office (CBFO) |
| Email Mark.Bollinger@cbfo.doe.gov | |
| Signature of legal owner, operator or authorized representative Original Signature on File | Date (mm/dd/yyyy) 12/19/2024 |
| Printed Name (First, Middle Initial Last) Ken Harrawood | Title Program Manager, Salado Isolation Mining Contractors LLC |
| Email Ken.Harrawood@wipp.doe.gov | |

| | |
|--|---|
| 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

| | | | |
|------------------------|---------|----------|-------------------------------------|
| 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 |
|----------------|------------------|---|
| | | 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

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

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

| Line No. | A. EPA Hazardous Waste No. | | | | B. Estimated Annual Qty of Waste | C. Unit of Measure | D. Processes | | | | | | | | | |
|----------|----------------------------|---|---|---|----------------------------------|--------------------|-------------------|---|---|---|---|--|---|---|---|--------------|
| | | | | | | | (1) Process Codes | | | | | (2) Process Description (if code is not entered in 7.D1) | | | | |
| 0 1 | D | 0 | 0 | 4 | 903 | M | X | 0 | 4 | S | 0 | 1 | S | 0 | 1 | |
| 0 2 | D | 0 | 0 | 5 | 484 | M | X | 0 | 4 | S | 0 | 1 | S | 0 | 1 | |
| 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 | X | 0 | 4 | S | 0 | 1 | S | 0 | 1 | |
| 0 5 | D | 0 | 0 | 8 | 3246 | M | X | 0 | 4 | S | 0 | 1 | S | 0 | 1 | |
| 0 6 | D | 0 | 0 | 9 | 1727 | M | X | 0 | 4 | S | 0 | 1 | S | 0 | 1 | |
| 0 7 | D | 0 | 1 | 0 | 186 | M | X | 0 | 4 | S | 0 | 1 | S | 0 | 1 | |
| 0 8 | D | 0 | 1 | 1 | 1090 | M | X | 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 | X | 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.

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.

Owner and Operator Signature: Original Signature on File
Title: Manager, Carlsbad Field Office (CBFO)
for: U.S. Department of Energy
Date: 12/19/2024

Co-Operator Signature: Original Signature on File
Title: Program Manager
for: Salado Isolation Mining Contractors LLC
Date: 12/19/2024

Item 3

Description

This modification revises Permit text to remove redundancy in the Acceptable Knowledge Summary Report (**AKSR**) pertaining to TRU Waste Content (**TRUCON**) Codes.

- Permit Attachment C3, *Quality Assurance Objectives and Data Validation Techniques for Waste Characterization Methods*
 - Section C3-6b (2), *Characterization Information Summary*
 - Removed “TRUCON codes,” from the 5th bullet.
 - Added the following sentence, “TRUCON codes are to be included in the WSPF pursuant to Permit Attachment C3, Section C3-6b(1) and may also be included in the AK Summary.”
- Permit Attachment C6, Audit and Surveillance Program
 - Table C6-1, Waste Analysis Plan (WAP) General Checklist for us at DOE’s Generator/Storage Sites
 - Item 56a
 - Removed “TRUCON codes,”.
 - Added the following to be consistent with the change described above: “TRUCON codes are to be included in the WSPF pursuant to Permit Attachment C3, Section C3-6b(1) and may also be included in the AK Summary.”

Basis

This change is classified as "Administrative and informational changes..." pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42 Appendix I, A.1) and is, therefore, a Class 1 Permit modification.

Discussion

This change provides the option to list applicable TRUCON codes in the AKSR. While TRUCON codes are required for the Waste Stream Profile Form (**WSPF**), it is unnecessary for TRUCON codes to be required in both the AKSR and the WSPF. This change is needed to remove the redundancy of listing the TRUCON codes in both the WSPF and AKSR. This change is also needed because there are times when the TRUCON codes have not been developed until after the AKSR is completed. If the applicable TRUCON codes are available prior to completion of the AKSR then the certified program may include them in the AKSR. If they are available after the AKSR is completed, then it will be reported only in the WSPF. Note that a TRUCON code is solely a transportation parameter required by the WIPP TRAMPACs. It is not required for waste characterization, and it is not a waste identification or categorization scheme used at facilities as described in Permit Attachment C4, Section C4-2a. It is required only to transport TRU and TRU mixed waste. This change does not reduce the ability of the Permittees to provide continued protection to human health or the environment.

Revised Permit Text:

ATTACHMENT C3

QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

C3-6b(2) Characterization Information Summary

The CIS shall include the following elements, if applicable:

- Data reconciliation with DQOs
- Radiography and VE summary to document that prohibited items are absent in the waste and to verify that the physical form of the waste matches the waste stream description as determined by AK (if applicable).
- A justification for the selection of radiography and/or VE as an appropriate method for characterizing the waste.
- A complete listing of the container identification numbers used to generate the WSPF, cross-referenced to each BDR.
- Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, ~~TRUCON codes,~~ Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TRU Waste Baseline Inventory Report information, waste stream description, areas of operation, generating processes, Resource Conservation and Recovery Act determinations, radionuclide information, the references used to generate the AK summary, and any other information required by Permit Attachment C4, Section C4-2b. TRUCON codes are to be included in the WSPF pursuant to Permit Attachment C3, Section C3-6b(1) and may also be included in the AK Summary.
- Method for determining Waste Material Parameter Weights per unit of waste.
- List of AK Sufficiency Determinations requested for the waste stream, if applicable.
- Certification through AK or testing that any waste assigned the EPA hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste.

ATTACHMENT C6

AUDIT AND SURVEILLANCE PROGRAM

Table C6-1
Waste Analysis Plan (WAP) General Checklist for use at DOE'S Generator/Storage Sites

| | WAP Requirement ¹ | Procedure Documented | | Example of Implementation/ Objective Evidence, as applicable | | Comment (e.g., any change in procedure since last audit, etc.) |
|--------------------------------------|--|----------------------|-------------------------|---|------------------|---|
| | | Location | Adequate? Y/N (Why?) | Item Reviewed | Adequate? Y/N | |
| Records and Record Management | | | | | | |
| 56a | <p>Are procedures in place to ensure that hard copy or electronic Characterization Information Summary will include the following:</p> <ul style="list-style-type: none"> • Data reconciliation with DQOs • Radiography and VE summary to document that prohibited items are absent in the waste and to verify that the physical form of the waste matches its waste stream description as determined by AK (if applicable). • A complete listing of container identification numbers used to generate the WSPF, cross-referenced to each BDR. • Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, references used to generate the AK summary, and any other information required by Permit Attachment C4, Section C4-2b. <u>TRUCON codes are to be included in the WSPF pursuant to Permit Attachment C3, Section C3-6b(1) and may also be included in the AK Summary.</u> • Method for determining Waste Material Parameter Weights per unit of waste. • List of any AK Sufficiency Determinations requested for the waste stream. • Certification through AK or testing that any waste assigned the hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste. • A justification for the selection of radiography and/or VE as an appropriate method of characterizing the waste. <p>(Section C3-6b(2))</p> | | | | | |

Item 4

Description

This modification revises Permit text to address equipment inspections for inaccessible areas. This change is to maintain consistency within the Permit pertaining to these areas. This change moves the term “accessible area” from specific equipment and areas in Permit Attachment E, Table E-1 to footnote “h.” Permit Attachment E is updated with the following changes:

- Permit Attachment E, *Inspection Schedule, Process and Forms*
 - Table E-1, *Inspection Schedule/Procedures*
 - Underground Openings-Roof Bolts and Travelways
 - Deleted “of” and moved “Accessible Areas” from the *Procedure Number and Inspection Criteria* column to footnote “h.”
 - Closure Bulkheads
 - Deleted “in” and moved “Accessible Areas” from the *Procedure Number and Inspection Criteria* column to footnote “h.”
 - Table E-1 (Continued), *Inspection Schedule/Procedures Notes*
 - Replace “PM’s” with “preventative maintenance”.
 - Add “, located in an inaccessible area, or for underground areas or structures that are not accessible” to footnote h so that the first sentence in the footnote reads as “Inspections and preventative maintenance are not required for equipment that is: out of service, or located in an inaccessible area, or for underground areas or structures that are not accessible.”

Basis

This change is classified as "Administrative and informational changes..." pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42 Appendix I, A.1) and is, therefore, a Class 1 Permit modification.

Discussion

These changes are needed to address inspections that take place in areas that are inaccessible. These changes maintain consistency in Permit Attachment E, Table E-1, regarding the completion of an inspection in inaccessible areas.

There are times when inspections cannot be conducted because the areas in which the equipment or structures are located are not accessible due to certain situations. These situations can include but are not limited to: circumstantial conditions, planned outages or maintenance activities. For example, the exhaust shaft will be temporarily inaccessible for inspection during periods when the UG ventilation system duct work is connected to the Safety Significant Confinement Ventilation System (i.e., New Filter Building and Salt Reduction Building). The purpose for inspecting these items is to identify malfunctions or deteriorating equipment and structures, in order to detect and correct deficiencies prior to posing a threat to

human health or the environment, per regulatory requirements. Therefore, inspections are only completed in areas that can be safely accessed.

This change removes the term “accessible area” from the item and incorporates it into footnote “h” to delineate that inspections are not required for any equipment, structures, and areas that are not accessible. These changes do not reduce the inspection frequency or criteria for inspections, rather footnote “h” is revised to maintain consistency for areas of inaccessibility and reflect the applicability of inspections in situations when relevant.

This change does not reduce the ability of the Permittees to provide continued protection to human health or the environment and does not hinder the maintenance as necessary to assure proper operation of equipment in time of an emergency.

Revised Permit Text:

ATTACHMENT E

INSPECTION SCHEDULE, PROCESS AND FORMS

Table E-1
Inspection Schedule/Procedures

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|--|---------------------------------|---|--|
| Air Intake Shaft Hoist | Underground Operations | Preoperational ^c | WP 04-HO1004 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with Mine Safety and Health Administration (MSHA) requirements |
| Ambulance (Surface) and Medical Cart (Underground) | Emergency Services | Weekly | WP 12-FP0030 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Required Equipment ⁿ |
| Adjustable Center of Gravity Lift Fixture | Waste Operations | Preoperational ^c | WP 05-WH1410 Inspecting for Mechanical Operability ^m and Deterioration ^b |
| Backup Power Supply Diesel Generators | Facility Operations | Monthly | WP 04-ED1301 Inspecting for Mechanical Operability ^m and Leaks/Spills by starting and operating both generators. Results of this inspection are recorded on EA04AD3008-47-0 |
| Facility Inspections (Water Diversion Berms) | Facility Engineering | Annually | WP 10-WC3008 Inspecting for Damage, Impediments to water flow, and Deterioration ^b |
| Central Monitoring Systems (CMS) | Facility Operations | Continuous | Automatic Self-Checking |
| CH TRU Underground Transporter | Waste Operations | Preoperational ^c | WP 05-WH1603 WP 05-WH1604 Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , area around transporter clear of obstacles, and on-board automatic fire suppression system |

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|---------------------------------|--|---|--|
| Conveyance Loading Car | Waste Operations | Preoperational ^c | WP 05-WH1406 Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place |
| Facility Transfer Vehicle | Waste Operations | Pre-evolution ^p | WP 05-WH1204 Pre-evolution Checks and Operating Instructions, Inspecting for Mechanical Operability ^m , Deterioration ^b , path clear of obstacles, and guards in the proper place |
| Emergency Lighting | Emergency Services | Monthly/Annually | WP 12-FP0051 Inspecting for Deterioration ^b , and Operability of indicator lights in accordance with NFPA 101 |
| Exhaust Shaft | Underground Operations | Quarterly | PM041099 Inspecting for Deterioration ^b |
| Eye Wash and Shower Equipment | Environmental, Safety, Industrial Health | Weekly | WP 12-IS1832 Inspecting for Deterioration ^b |
| | | Semi-annually | WP 12-IS1832 Inspecting for Deterioration ^b and Fluid Levels–Replace as Required |
| Fire Detection and Alarm System | Fire Protection Engineering | Semi-annually/Annually | WP 12-FP0027 Inspecting for Deterioration ^b and Operability of underground fuel station fire suppression system in accordance with NFPA 17 (semi-annual inspection); Inspecting for Deterioration ^b and Operability of the alarm panel, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72 (annual inspection) |
| | | Monthly/Quarterly/Annually | WP 12-FP0028 Inspecting for Deterioration ^b , and Operability of the alarm panel, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72 |
| Fire Extinguishers ^j | Emergency Services | Monthly | WP 12-FP0036 Inspecting for Deterioration ^b , Leaks/Spills, Expiration, seals, fullness, and pressure |

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|--|---------------------------------|---|--|
| Fire Hoses | Emergency Services | Annually (minimum) | WP 12-FP0031 Inspecting for Deterioration ^b and Leaks/Spills |
| Fire Hydrants | Fire Protection Engineering | Semi-annual/Annually | WP 12-FP0034 Inspecting for Deterioration ^b and Leaks/Spills |
| Fire Pumps | Fire Protection Engineering | Weekly | WP 12-FP0026 Inspecting for Deterioration ^b , Leaks/Spills, fire water valve position(s), and panel light status |
| | | Annually (Electric Pump) | WP 12-FP5113 Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed |
| | | Annually (Diesel Pump) | WP 12-FP5114 Inspecting for Deterioration ^b , operability, flow, discharge pressure, suction pressure, and pump speed |
| Fire Sprinkler Systems | Fire Protection Engineering | Monthly | WP 12-FP0023, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration ^b , Leaks/Spills, and water pressures |
| | | Quarterly | WP 12-FP0024, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration ^b , Leaks/Spills, and water pressures |
| | | Annually | WP 12-FP0025, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration ^b , Leaks/Spills, water pressures, and main drain test |
| Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart) | Emergency Services | Weekly | WP 12-FP0033 Inspecting for Mechanical Operability ^m , Deterioration ^b , Leaks/Spills, and Required Equipment ⁿ |
| Electric Forklifts Used for Waste Handling | Waste Operations | Preoperational ^c | WP 05-WH1401 WP 05-WH1402 WP 05-WH1403 Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , and presence of on-board fire extinguisher |

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|---|--|---|--|
| Diesel Forklifts Used for Waste Handling | Waste Operations | Preoperational ^o | WP 05-WH1201 WP 05-WH1207 WP 05-WH1412 Inspecting for Leaks/Spills, Mechanical Operability ^m , Deterioration ^b , and on-board automatic fire suppression system |
| Automatic on-board fire suppression systems | Fire Protection Engineering | Monthly/Semi-annually | WP 12-FP0085 WP 12-FP0060 Inspecting for Mechanical Operability ^m and Deterioration ^b |
| Hazardous Material Response Equipment | Emergency Services | Monthly | WP 12-FP0033 Inspecting for Deterioration ^b , and Required Equipment ⁿ |
| Head Lamps | Facility Personnel | Daily ⁱ | Head lamps are operated daily and are repaired or replaced upon failure |
| Miners First Aid Station | Emergency Services | Quarterly | WP 12-FP0035 Inspecting for Required Equipment ⁿ |
| Mobile Phones | Facility Personnel | Daily ⁱ | Mobile Phones are operated daily and are repaired or replaced upon failure |
| Mine Pager Phones (between surface and underground) | Facility Operations | Monthly/Annually ^o | WP 04-PC3017 WP 04-PC3018 Testing of Mine Pager Phones at essential locations |
| MSHA Air Quality Monitor | Maintenance/ Underground Operations | Daily ⁱ | WP 12-IH1828 Inspecting for Air Quality Monitoring Equipment Functional Check |
| Perimeter Fence, Gates, Signs | Security | Daily | WP 17-SS1023 Inspecting for Deterioration ^b and Required Permit Part 2, Section 2.6.4 warning signs |
| Mine Rescue Self-Contained Breathing Apparatus (SCBA) | Mine Rescue Team | 30 days | WP 12-ER3007 Inspection for Deterioration ^b and Pressure ^g |
| Emergency Services SCBA | Emergency Services | Weekly/Monthly | WP 12-FP0029 Inspecting for Deterioration ^b and Pressure |

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|--|---------------------------------|--|--|
| Site Notification System; Underground Evacuation Alarm System | Facility Operations | Monthly/Annually | WP 04-PC3017 WP 04-PC3018 Testing of PA and Underground Alarms |
| Radio Equipment | Facility Personnel | Daily ⁱ | Radios are operated daily and are repaired or replaced upon failure |
| Salt Handling Shaft Hoist | Underground Operations | Preoperational ^c | WP 04-HO1002 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m in accordance with MSHA requirements |
| Self-Rescuers and Self-Contained Self-Rescuers | Underground Operations | Quarterly | WP 04-AU1026 Inspecting for Deterioration ^b and Functionality in accordance with MSHA requirements |
| Surface CH TRU Mixed Waste Handling Area ^k | Waste Operations | Preoperational ^c or Weekly ^e | WP 05-WH1101 Inspecting for Deterioration ^b , Leaks/Spills, Required Aisle Space ^q , Required Permit Part 2, Section 2.6.4 warning signs, Communication Systems, Container Condition, and Floor coating integrity |
| TRU Mixed Waste Decontamination Equipment | Waste Operations | Annually | WP 05-WH1101 Inspecting for Required Equipment ⁿ |
| Underground Openings—Roof Bolts and Travelways | Underground Operations | Weekly | WP 04-AU1007 Inspecting for Deterioration ^b of Accessible Areas |
| Underground—Geomechanical Instrumentation System (GIS) | Geotechnical Engineering | Monthly | WP 07-EU1301 Inspecting for Deterioration ^b |
| Underground TRU Mixed Waste Disposal Area | Waste Operations | Preoperational ^c | WP 05-WH1810 Inspecting for Deterioration ^b , Leaks/Spills, mine pager phones, unobstructed access, required Permit Part 2, Section 2.6.4 warning signs, debris, and ventilation |

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|--|---------------------------------|---|---|
| Uninterruptible Power Supply (Central UPS) | Facility Operations | Daily | WP 04-ED1542 Inspecting for Mechanical Operability ^m and Deterioration ^b with no malfunction alarms. Results of this inspection are recorded on EA04AD3008-20-0 |
| TDOP Upender | Waste Operations | Pre-evolution ^p | WP 05-WH1010 Pre-evolution Checks and Operating Instructions, Inspecting for Mechanical Operability ^m and Deterioration ^b |
| Waste Handling Cranes | Waste Operations | Preoperational ^c | WP 05-WH1407 Inspecting for Mechanical Operability ^m , Deterioration ^b , and Leaks/Spills |
| Waste Hoist | Underground Operations | Preoperational ^c | WP 04-HO1003 Inspecting for Deterioration ^b , Safety Equipment, Communication Systems, and Mechanical Operability ^m , Leaks/Spills, in accordance with MSHA requirements |
| Water Tanks | Facility Operations | Daily | WP 04-AD3008 Inspecting for Deterioration ^b , valve lineup, and water levels. Results of this inspection are recorded on EA04AD3008-12-0 and EA04AD3008-13-0 |
| Push-Pull Attachments | Waste Operations | Preoperational ^c | WP 05-WH1401 WP 05-WH1412 Inspecting for Damage, Mechanical Operability ^m , and Deterioration ^b |
| Trailer Jockey | Waste Operations | Preoperational ^c | WP 05-WH1405 Inspecting for Leaks/Spills, Mechanical Operability ^m and Deterioration ^b |
| Closure Bulkheads | Underground Operations | Semi-annually | PM000011 Integrity and Deterioration ^b in Accessible Areas |
| Bolting Robot | Waste Operations | Preoperational ^c | WP 05-WH1203 Mechanical Operability ^m |
| SCA Handler | Waste Operations | Preoperational ^c | WP 05-WH1450 Inspecting for Mechanical Operability ^m and Deterioration ^b |

| System/Equipment Name | Responsible Organization | Inspection^a Frequency | Procedure Number and Inspection Criteria^h |
|------------------------------|---------------------------------|---|--|
| Yard Transfer Vehicle | Waste Operations | Pre-evolution ^p | WP 05-WH1205 Pre-evolution Checks and Operating Instructions, Mechanical Operability ^m , Deterioration ^b , Path clear of obstacles and Guards in proper place |
| Payload Transfer Station | Waste Operations | Pre-evolution ^p | WP 05-WH1208 Pre-evolution Checks and Operating Instructions, Mechanical Operability ^m , Deterioration ^b , and Guards in proper place |
| Monorail Hoist | Waste Operations | Pre-evolution ^p | WP 05-WH1202 Pre-evolution Checks and Operating Instructions, Mechanical Operability ^m , Deterioration ^b , and Leaks/Spills |
| Bolting Station | Waste Operations | Preoperational ^c | WP 05-WH1203 Mechanical Operability ^m , Deterioration ^b , and Guards in proper place |

Table E-1 (Continued)
Inspection Schedule/Procedures Notes

- ^a Inspection may be accomplished as part of or in addition to regularly scheduled preventive maintenance inspections for each item or system. Certain structural systems of the WHB and Waste Hoist are also subject to inspection following severe natural events including earthquakes, tornados, and severe storms. Structural systems include columns, beams, girders, anchor bolts and concrete walls.
- ^b Deterioration includes: obvious visible cracks, erosion, salt build-up, damage, corrosion, loose or missing parts, malfunctions, and structural deterioration.
- ^c "Preoperational" signifies that inspections are required prior to the first use during a calendar day. For calendar days in which the equipment is not in use, no inspections are required. For an area this includes: area is clean and free of obstructions (for emergency equipment); adequate aisle space; emergency and communications equipment is readily available, properly located and sign-posted, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and switch positions, battery charge levels, pressures, general cleanliness, and that all functional components and emergency equipment is present and operational.
- ^e These weekly inspections apply to container storage areas when containers of waste are present for a week or more.
- ^g Inspections are performed per manufacturer's maintenance instructions.
- ^h Inspections and ~~PM's~~ **preventative maintenance** are not required for equipment that is: out of service, **located in an inaccessible area, or for underground areas or structures that are not accessible.** However, if compensatory measures have been established to ensure an equivalent level of protection during the period that the equipment is out of service (e.g., required equipment/supplies from an out-of-service emergency vehicle have been temporarily relocated), appropriate inspections will be scheduled, conducted, and documented in the Operating Record, in accordance with Attachment E, Section E-1.
- ⁱ Head Lamps, Mobile Phones, and Radios are not routinely "inspected." They are typically used in day-to-day operations. They are used until they fail, at which time they are replaced and repaired.
- ^j Fire extinguisher inspections are performed in accordance with NFPA 10.
- ^k Surface CH TRU mixed waste handling areas include the PAU, the WHB unit, and unloading areas.
- ^l No log forms are used for daily readings. However, readings that are out of tolerance are reported to the CMR and logged by CMR operator. Inspection includes daily functional checks of portable equipment.
- ^m Mechanical Operability means that the equipment has been checked and is operating in accordance with site safety requirements (e.g., proper fluid levels and tire pressure; functioning lights, alarms, sirens, and power/battery units; and belts, cables, nuts/bolts, and gears in good condition), as appropriate.
- ⁿ Required Equipment means that the equipment identified in Table D-2 is available and usable (i.e., not expired/depleted and works as designed).
- ^o Mine pager phones in non-essential locations are not routinely "inspected". Many are used in day-to-day operations. They are used until they fail, at which time they are repaired. Mine pager phones are used routinely by Underground Operations.
- ^p "Pre-evolution" signifies that inspections are required prior to equipment use in the waste handling process. A TRUPACT-III shipment evolution is considered to be the process that begins with placing a loaded TRUPACT-III package on the Yard Transfer Vehicle (**YTV**) in the PAU, includes waste storage in the WHB Unit, and ends when the empty TRUPACT-III is removed from the YTV in the PAU. Additionally, a TDOP-Upender evolution is considered to be the process that begins with the empty TDOP placed on the Upender and ends with storage of the overpacked waste container in the WHB Unit.
- ^q In the PAU, the aisle spacing between trailers carrying the CH or RH packages are maintained at a minimum of four feet. In the CH Bay Storage Area of the WHB Unit, a minimum aisle space of 44 inches between loaded facility pallets is maintained. Also, in the CH Bay, a minimum aisle space of 44 inches is maintained between the walls of the CH Bay and a loaded facility pallet.