



Department of Energy

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

JUL 12 2018

Mr. John E. Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Response to the Referenced Technical Incompleteness Determination,
Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number:
NM4890139088-TSDF

Reference: New Mexico Environment Department correspondence from John E. Kieling, Chief, Hazardous Waste Bureau to Todd Shrader, CBFO and Bruce C. Covert, NWP, dated June 27, 2018 subject: Technical Incompleteness Determination of Class 3 Modification Clarification of TRU Mixed Waste Disposal Volume Reporting Waste Isolation Pilot Plant EPA I.D. Number NM4890139088

Dear Mr. Kieling:

Enclosed is the Permittees' response to the referenced Technical Incompleteness Determination. Please note that the Permittees separated New Mexico Environment Department's (NMED's) comments into subparts in order to respond thoroughly to each respective item. Enclosed are the following:

- Response to NMED Comments on the Permit Modification Request
 - Waste Isolation Pilot Plant Oversight Agencies
 - Current Version of the Part A form (revised Permit Attachment B)
- Compact disk with references cited in the Response to NMED Comments on the Permit Modification Request

Note that the Permittees are submitting a complete Part A application using the Environmental Protection Agency recently issued revised forms. The Permittees will submit a signed copy of the Part A when and if the Permit Modification Request is approved.

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

JUL 12 2018

Mr. Kieling

-2-

significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

Sincerely,

Signatures on File

Todd Shrader, Manager
Carlsbad Field Office

Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

R. Maestas, NMED * ED

D. Biswell, NMED ED

M. McLean, NMED ED

H. Tellez, NMED ED

CBFO M&RC

*ED denotes electronic distribution

Enclosure 1

Response to NMED Comments on the Permit Modification Request

Attachment 1:

- Waste Isolation Pilot Plant Oversight Agencies

Attachment 2:

- Current version of Part A form (revised Permit Attachment B)
 - Changes to Permit Attachment B, Hazardous Waste Application Part A
 - Redline strikeout
 - Clean version

Response to NMED Comments on Permit Modification

Note that in the following responses, the NMED Comments have been separated into individual parts to facilitate responding using designators a., b., c.,

1. Overview

Page 2, pdf page 6 states: *“The TRU waste VOR [volume of record] will be tracked and reported, separately from the Permit, by the DOE pursuant to the WIPP Land Withdrawal Act (“LWA”) so that the LWA total capacity limit for TRU waste is not exceeded.”*

Page 3, pdf page 7 states: *“The DOE will establish and implement a written policy to formalize the tracking and reporting of the TRU waste VOR.”*

Page 6, pdf page 10 states: *“...a mechanism that is not associated with the Permit will be used by DOE to track and report the VOR pursuant to the LWA.”*

Page 9, pdf page 13 states: *“This change will allow the DOE to establish a formal tracking and reporting mechanism, independent of the Permit, for comparing the disposed TRU waste VOR to the 6.2 million ft³ (175,564 m³) capacity limit of the WIPP LWA.”*

- a. Please provide details of DOE’s plan or mechanism to track and report waste volumes pursuant to the LWA.
- b. Please clarify if DOE will use fill factor or inner container volumes.
- c. Explain how and when the plan will be implemented.
- d. Also, please clarify if the action will be retroactive.
- e. Provide the conversion factors or calculations that will be used to convert RCRA volume to LWA volume.

RESPONSE:

- a. The Department of Energy (DOE)/Carlsbad Field Office (CBFO) will prepare and implement a management policy that requires the CBFO National TRU Program Office to accumulate the necessary data and to report the data to the CBFO Manager annually. The Policy will establish the methodology for implementing a tracking method for the limitation in Section 7(a)(3) of the Waste Isolation Pilot Plant (WIPP) Land Withdrawal Act (LWA) of 1992 (Public Law 102-579, and as amended by Public Law 104-201)^{1, 2} stated as “6.2 million cubic feet of transuranic (TRU) waste.” The tracked volume is the volume of emplaced waste and will be referred to as the “Land Withdrawal Act TRU Waste Volume of Record” (VOR) and will be used to determine when the DOE has reached the statutory total capacity limit of TRU waste of 6.2 million cubic feet (ft³) (175,564 cubic meters (m³)). The Policy will provide specific guidance regarding how TRU waste volumes will be tracked by using waste container volumes. The policy will distinguish between two categories of waste containers: Those that are overpacked and those that are not overpacked (i.e., direct loaded). The DOE will consider the volume of TRU waste to be the volume of the innermost waste container being disposed of for overpacked containers. The volume of TRU waste in containers that are direct-loaded will be tracked according to the container’s internal volume. A list of approved containers is shown below in Table 1. This table includes packaging configurations involving overpacking, however, this list of packaging configurations is not exhaustive.
- b. The Policy will not instruct the use of “fill factors” in performing the data collection.

¹ U. S. Congress. 1992. Waste Isolation Pilot Plant Land Withdrawal Act of 1992. Public Law 102-579. Washington, D.C.

² U. S. Congress. 1996. Waste Isolation Pilot Plant Land Withdrawal Act Amendments. Public Law 104-201. Washington, D.C.

- c. The DOE/CBFO is preparing the policy to assure accurate and timely reporting of container volume data. The policy is a CBFO Management Policy and therefore will be issued by the Manager of the CBFO. This policy is anticipated to be implemented no later than federal Fiscal Year 2019. One immediate impact of the policy will be a change in the annual reporting to the EPA regarding the volume of disposed waste. In addition, the VOR will be posted on the WIPP Home Page.
- d. The policy will be implemented retroactively in order to apply this process to previously emplaced waste (waste emplaced since 1999).
- e. There are no conversion factors involved. The internal container volume of approved containers in the Permit Part 3, Section 3.3.1., will be used. These container volumes already reside in the Waste Data System (WDS). For containers that do not contain sufficient detail in the Permit (e.g., pipe-overpack containers), their internal container volumes will be programmed into the WDS. The volumes to be used for authorized containers are listed in Table 1. The list of authorized containers in Table 1 is taken from the TRU Waste Acceptance Criteria (WAC) for the Waste Isolation Pilot Plan, Revision 8³. The container volumes not listed in the WIPP Permit are based on the physical dimensions of the container. The list of overpack container configurations in Table 1 is not exhaustive. Configurations that use dunnage (empty) containers will not include the dunnage container volumes in the VOR volume determination.

Table 1

AUTHORIZED CONTAINER PER WIPP WAC	LWA VOR VOLUME (m³)	PERMIT CONTAINER VOLUME (m³)
55-gallon drum DL	0.21	0.21
85-gallon drum DL	0.32	0.32
85-gallon drum OP with 55-gallon drum	0.21	0.32
100-gallon drum DL	0.38	0.38
Shielded Container DL	0.11	0.21
Standard Waste Box DL	1.88	1.88
Standard Waste Box OP with 4 55-gallon drums	0.84	1.88
Standard Waste Box OP with 3 85-gallon drums	0.96	1.88
Standard Waste Box OP with 2 100-gallon drums	0.76	1.88
Ten-Drum Overpack DL	4.5	4.5
Ten-Drum Overpack OP with 10 55-gallon drums	2.10	4.5
Ten-Drum Overpack OP with 6 85-gallon drums	1.92	4.5
Ten-Drum Overpack OP with Standard Waste Box	1.88	4.5
12-in Standard Pipe Overpack Container (POC)	0.0488	0.21
Type S100 POC	0.00163	0.21
Type S200-A POC	0.00691	0.21
Type S200-B POC	0.0137	0.21
Type S300 POC	0.00269	0.21
Criticality Control Overpack	0.0128	0.21
Standard Large Box 2	7.39	7.39
RH Removable Lid Canister (DL)	0.89	0.89
RH Removable Lid Canister OP with 3 55-gallon drums	0.63	0.89
NS15 Neutron Shielded Canister	0.195	0.89
NS30 Neutron Shielded Canister	0.351	0.89

³ DOE 2016. Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant. DOE/WIPP-02-3122. Carlsbad Field Office. Carlsbad, NM. July 2016. URL: <http://www.wipp.energy.gov/library/wac/WAC.pdf>.

AUTHORIZED CONTAINER PER WIPP WAC	LWA VOR VOLUME (m ³)	PERMIT CONTAINER VOLUME (m ³)
DL = Direct loaded container OP = Overpack container		

2. Overview

Page 2, pdf page 6 states: “...40 CFR Part 194 requires the reporting of the volume of waste and also information regarding material parameter waste estimates and radionuclides for purposes of comparison to the input data used in the Compliance Certification Application.”

Page 9, pdf page 13 states: “...the authority for overseeing RCRA at the WIPP facility has been granted to the NMED by the Environmental Protection Agency, and the authority for management, tracking, and reporting the LWA TRU waste volume has been granted to the DOE by Congress.”

- In order to address public concern regarding the oversight of DOE, please clarify to whom or what organization the LWA volume and additional information mentioned above will be reported to, and how this will be documented.
- Provide details, if any, regarding regulatory oversight.
- Provide a list of regulatory agencies or organizations who oversee the WIPP Permittees.

RESPONSE:

- The DOE complies with applicable statutes and regulations, including the pertinent LWA provisions. The CBFO will post the VOR information on the WIPP Home Page to afford transparency. In addition, the VOR will be included in an annual report to the U.S. Environmental Protection Agency (EPA) describing the status of the system of controls in place to monitor key parameters such as material parameter weight estimates and the quantity of radionuclides.
- As with other aspects of the DOE regulatory compliance program, the agency has committed to transparency regarding the VOR for any organization that chooses to track the volumes. The implementation of the CBFO policy will be subject to internal assessment by the DOE/CBFO Quality Assurance organization. In addition, it is open to inspection to other DOE organizations and EPA during their annual site inspections. The DOE management of the VOR does not impact the NMED’s authority to establish RCRA capacity limits for Hazardous Waste Disposal Units (HWDUs). Furthermore, the NMED’s oversight related to RCRA volumes includes review of Permit modifications for new HWDUs.
- See Attachment 1 for the requested list of agencies and organizations that oversee the Permittees. This list only addresses the DOE and NWP and is not an exhaustive list.

3. Overview

Page 3, pdf page 7 states: “...the tracking and reporting will be subject to the DOE Quality Assurance program which will assure consistent application of the policy.”

Please provide information on the DOE Quality Assurance program and how it will apply to LWA volume reporting.

RESPONSE:

The following sections of the U.S. DOE Carlsbad Field Office Quality Assurance Program Document (QAPD)⁴ apply to the CBFO management policy and its implementation:

- Section 1 – Management Requirements
- Section 2 – Performance Requirements
- Section 3 – Assessment Requirements
- Section 6 – Software Requirements

This will provide assurance that the process is implemented and assessed.

4. Overview

Page 3, pdf page 7 states: *“The DOE intends to make the status of the WIPP LWA TRU waste volume tracking results publicly available.”*

Please provide further details on the location, method, and reporting frequency for the WIPP LWA TRU waste volume tracking results, to include how the public will have access to this information.

RESPONSE:

A link to the information regarding the VOR will be placed on the WIPP Home Page at www.wipp.energy.gov. The DOE plans to update the information at least monthly as the information changes. The annual report required by the DOE policy will be posted to the WIPP Home Page. The Permittees propose adding a reference to this link to Permit Part 4, Table 4.1.1, footnote 3, in the Draft Permit. See the proposed change to the revised text in the draft Permit below highlighted in yellow.

³ Final TRU Mixed Waste Volume calculations are based on the outermost disposal container volumes, not the Land Withdrawal Act TRU Waste Volume of Record disposed. The volume listed here is reported pursuant to Permit Part 6, Section 6.10.1. The Land Withdrawal Act TRU Waste Volume of Record is tracked and reported, separately from the Permit, by the DOE relative to the WIPP Land Withdrawal Act total capacity limit of 6.2 million ft³ (175,564 m³) of TRU waste (Pub.L. 102-579, as amended). A link to the Land Withdrawal Act TRU Waste Volume of Record is posted on www.wipp.energy.gov.

5. Overview

Page 3, pdf page 7 states: *“This packaging information is recorded by the generator/storage sites in the WWIS [WIPP Waste Information System]. The WWIS is the Permittees’ database in which generator/storage sites record the necessary information for reporting both the TRU mixed waste volume and the LWA TRU waste VOR.”*

Page 9, pdf page 13 states: *“The WWIS database is the single database used by the Permittees to record the types and quantities of TRU mixed waste characterized, managed, stored and disposed at the WIPP facility. There is sufficient container data information in the WDS [Waste Data System] to query and report waste volumes as needed pursuant to the proposed definitions.”*

⁴ DOE 2017. Quality Assurance Program Document, DOE/CBFO-94-1012, Revision 13. Carlsbad, NM. April 2017. http://www.wipp.energy.gov/library/qapd/DOE-CBFO-94-1012_Rev_13_Eff_04-20-17.pdf.

Please describe the processes and procedures that are in place to review and verify that waste volumes entered into the WWIS are accurate, to include external reviews of these processes and procedures.

RESPONSE:

Generator/Storage sites have procedures in place to ensure only approved containers are used. Only approved containers can be used for certifying waste by the generator/storage sites. Approved container information, including respective volume information, is included in the WDS. Generators can only specify approved payload containers listed in the WAC. Internal checks in the WDS prevent approval of shipments with non-approved containers. This provides the assurance that the container reported for the Permit is an approved container with a known volume. This process has been in place since the initiation of shipments in 1999. These generator/storage site processes and procedures are inspected annually during annual generator/storage site recertification audits, conducted by the CBFO QA and EPA, and observed by NMED.

6. General

Please provide information for the basis of the designation of the LWA 6.2 million ft³ volume of TRU waste.

RESPONSE:

In preparing the National Environmental Policy Act (NEPA)-required environmental impact statement, DOE performed an inventory evaluation to estimate the quantity of TRU waste that would be disposed in the WIPP facility. The waste volume inventory estimates were generated in the late 1970's to early 1980 by the DOE sites engaged in weapons production or in storage/disposal of weapons-related waste. The 1980 Final Environmental Impact Statement (FEIS)⁵, Volume 1, Page 1-5 states: "Over its 25-year operating life, the WIPP could receive about 6.2 million cubic feet of contact-handled [CH] TRU waste and as much as 250,000 cubic feet of remotely handled [RH] TRU waste. This would account for all of the TRU waste currently held in interim storage in Idaho, two-thirds of that expected to be generated at all DOE facilities between now and 1990, and all of that expected to be produced from 1990 through 2003." This limiting volume of TRU waste for the WIPP repository was established in the Record of Decision (ROD) for the WIPP Project⁶.

The ROD volumes were incorporated into the Consultation and Cooperation Agreement (C&C Agreement)⁷ in the first modification to the C&C Agreement signed by DOE and the state of New Mexico in November 1984. The incorporation was by way of reference to the 1981 ROD.

A TRU waste volume capacity limit was subsequently stipulated in the WIPP LWA of 1992 (Pub. L. 102-579 as amended by Public Law 104-201). The LWA did not specify a separate volume limit of 250,000 ft³ for RH TRU waste. Thus, the LWA limit is a combined volume (CH TRU and RH TRU) of 6.2 million ft³ (175,564 m³).

⁵ DOE. 1980. Final Environmental Impact Statement. Waste Isolation Pilot Plant. DOE/EIS-0026. Volume 1. Washington, D.C.

⁶ DOE. 1981. Waste Isolation Pilot Plant (WIPP), Record of Decision. 46 Fed. Reg. 9162. Washington, D.C. January 1981.

⁷ DOE. 1981. Consultation and Cooperation Agreements. Carlsbad Field Office. Carlsbad, NM.

http://www.wipp.energy.gov/library/Information_Repository_A/Supplemental_Information/Consultation%20and%20Cooperation%20Agreement.pdf.

Based on the versions of the WIPP Land Withdrawal Legislation introduced in the Senate (Senate Bill S 1671)⁸ and the House (House Bill HR 2637)⁹, the Congress ultimately focused on the 6.2 million ft³ of waste identified in the DOE NEPA documentation. In the one instance where container volumes and total volume were mentioned simultaneously (i.e., HR 2637 RH, Section 9(a)(3)), the containers are filled containers.

The volume specified in the FEIS assumes containers are filled. This is deduced from the number of containers versus volume shipped in the transportation discussion using Tables 6-2, 6-3, and 6-4. This means that the design of disposal volume is directly related to the volume of waste the DOE intended to remove from the generator sites and place in the WIPP facility. The second Supplemental Environmental Impact Statement (SEIS-II)¹⁰ addressed the uncertainty regarding volumes as follows: (from SEIS II page 3-8)

While the LWA and C&C Agreement include limits on the volume of TRU waste that can be emplaced, there is considerable uncertainty concerning how much of a container's volume is made up of TRU waste and how much is void space. Many of the containers would include a great deal of void space, particularly for RH-TRU waste; the actual volume of waste in a drum or cask, therefore, may be much less than the volume of the drum or cask. For the purposes of analyses in SEIS-II, the volume of the drum or cask is used, as if the drum or cask were full without void space.

This statement reiterates that in performing analyses for the transportation of the waste to the WIPP facility and for the WIPP facility performance assessment, DOE used the volume of 6.2 million ft³ (175,564 m³) of actual waste in the WIPP repository with no regard for the amount of void space in the container. That is to say, the containers, as they existed at the generator/storage site, or as they were anticipated to be generated in the future, were full. Therefore, the container volumes defined the estimated waste volume. However, what the DOE did not anticipate was the need to overpack numerous containers prior to shipping. This overpacking did not increase the volume of TRU waste to be disposed, but it did impact how much space needed to be excavated and how much container volume needed to be permitted because overpacking introduces a significant amount of void space. It is this void space, introduced as the result of overpacking, that the DOE is accounting for by implementing the CBFO management policy regarding the VOR.

Additionally, the FEIS and subsequent final design of the WIPP repository anticipated disposal of the entire inventory in eight waste panels underground. According to the Design Validation Report (Appendix D1 of the Permit Application)¹¹, the total capacity of the eight-panel underground facility is 6,330,000 ft³ (179,245 m³). This equates to a per panel capacity of 791,250 ft³ (22,405 m³). After publication of the FEIS and Design Validation Report, several changes occurred which expanded the number of panels needed and decreased the disposal efficiency. These included a change in the packaging due to the development of the cylindrical TRUPACT-II shipping package and the introduction of standard waste boxes with a capacity of 66.3 ft³ (1.88 m³) which replaced the steel box in the FEIS which had a capacity of 112 ft³ (3.17 m³). The result was that the effective disposal volume in a panel was reduced to about 636,000 ft³ (18,000 m³) and panels 9 and 10 were designated for future disposal.

⁸ U. S. Senate. 1991. S1671. Waste Isolation Pilot Plant Land Withdrawal Act (Enrolled).

⁹ U. S. House of Representatives. 1992. H.R.2637. Waste Isolation Pilot Plant Land Withdrawal Act (Reported in House - RH).

¹⁰ DOE. 1997. Waste Isolation Pilot Plant Disposal Phase Final Supplemental Environmental Impact Statement Eddy County, near Carlsbad, New Mexico. DOE/EIS-0026-S2. Washington, D.C. September 1997.

¹¹ DOE. 1995. *Resource Conservation and Recovery Act (RCRA)* Part B Permit Application DOE/WIPP 91-005, Rev. 6. Appendix D1. Carlsbad, NM. May 1995.

7. General

The Overview of the Modification did not discuss the Federal Facility Compliance Act (“FFCA”). The FFCA amended the Solid Waste Disposal Act (“SWDA”), which includes the Resource Conservation and Recovery Act (“RCRA”). The FFCA requires federal facilities to comply with applicable hazardous waste laws.

Please describe how the FFCA affected DOE sites and how this might affect the plan to report LWA volume.

RESPONSE:

The requirement for DOE to comply with applicable hazardous waste laws at its facilities was settled in a lawsuit in 1984 (LEAF versus Hodel¹²). The FFCA waived sovereign immunity which means that the federal government can be held liable for violations of the hazardous waste laws. The table (Table 2) below is a concise description of the FFCA provided by the EPA¹³. Note that Table 2 is a direct quote. The DOE does not anticipate that FFCA implementation at the sites impacts the plan to track and report the VOR volumes. Please note that OFFE in Table 2 is an acronym for the EPA Office of Federal Facilities Enforcement.

Table 2

Requirement	Description & EPA Responsibility
Waiver of Sovereign Immunity	States have the ability to sue the Federal government and collect fines and penalties.
Section 3008(a) Order Authority	EPA shall initiate administrative enforcement actions against the Federal government in the same manner and under the same circumstances as actions would be initiated against any other person. No administrative order shall become final until the Federal government has had the opportunity to confer with the Administrator.
Comprehensive Environment Inspections	The EPA Administrator is required to undertake inspections at all Federal treatment, storage, and disposal facilities for hazardous waste. The owner or operator shall reimburse the EPA for costs of the inspections.
Groundwater Inspections	The EPA Administrator shall conduct a comprehensive groundwater monitoring evaluation at Federal facilities.
Mixed Waste	DOE must submit two inventory reports within 180 days of October 6, 1992: 1) a national inventory of all its mixed wastes regardless of the time they were generated on a state-by-state basis; and 2) a national inventory of its mixed waste treatment capacities and technologies. Both EPA and the state have 90 days to comment. DOE will then develop a plan for developing treatment

¹² Environmental Law Reporter. 1984. Legal Environmental Assistance Foundation, Inc. v. Hodel. 14 ELR 20425, No. 3-83-562 (E.D. Tenn. April 13, 1984) <http://elr.info/sites/default/files/litigation/14.20425.htm>.

¹³ U. S. Environmental Protection Agency. 1982. Federal Facilities Compliance Act Table. <https://www.epa.gov/fedfac/federal-facilities-compliance-act-table>.

	capacities and technologies to treat all the mixed wastes to standards in RCRA. Upon approval of the plan, EPA, or the delegated state, shall issue an order requiring compliance with the approved plan. OFFE has convened a workgroup to address the various requirements of the mixed waste provisions of the FFCA. States will be major players in this process.
Munitions as Hazardous Waste	The EPA Administrator shall propose, after consulting with the Secretary of Defense and appropriate state officials, regulations identifying when military munitions become hazardous waste and providing for safe transportation and storage of such waste. Within 24 months of the April 6, 1992, EPA shall promulgate the regulations.
Federally Owned Treatment Works (FOTW)	Federal government is now eligible for domestic sewage exclusion provided that the exempted material meets pretreatment standards of Section 307 of the Clean Water Act. OFFE has formed a workgroup to develop guidance in order to implement this new FOTW provision. Moreover, OFFE may propose a rulemaking to ensure proper monitoring of the FOTW by the Federal agency.
Public Vessels Provision	Public Vessels are not subject to RCRA requirements until the waste is transferred to shore. This exemption disappears if the waste is stored on a vessel for more than 90 days when the vessel is placed in reserve or the waste is transferred to another public vessel within the territorial waters of the United States for more than 90 days after the date of transfer. This new amendment appears to be self-implementing.

8. General

The term “Volume of Record” is neither used nor defined in the LWA. Please provide references, if any, as to where this term has been previously used or defined.

RESPONSE:

Volume of Record is a term developed by the DOE to uniquely describe the volume of defense-related TRU waste recorded against the WIPP capacity limit in the LWA. This term is not yet defined in WIPP Project Authorization Basis Documents or implementing plans or procedures. This term will be formally defined in the CBFO management policy.

9. General

NMED notes that since there is a proposed change to the Hazardous Waste Permit Application Part A in this Modification, the Permittees shall submit the current version of the Part A form.

RESPONSE:

A current version of the Part A form including revised Permit Attachment B is attached (see Attachment 2). The Permittees have also included any updates to the Site Identification Form and Attachment B that correspond with the updated Part A form. This includes changes reflected in the Permit Modification Request. Also included is an updated list of “Active Environmental Permits and Approvals for the Waste Isolation Plant...” The updates are shown in redline strikeout text. A clean version is also attached. Included with Attachment 2 is a list of changes that were needed but not previously described in the Permit Modification Request (e.g., changes related to the list of “Active Environmental Permits...”).

10. General

- a. Please provide details of the payload management policy.
- b. Describe the effect, if any, this policy has on the proposed changes in this Modification.

RESPONSE:

- a. Payload management is a method developed in order to assure shipments of TRU waste meet the WIPP TRU WAC with regard to the TRU alpha activity concentration in Permit Part 3, Section 3.3.3 (see excerpt below) for CH waste. Appendix E¹⁴ of the WIPP TRU WAC contains the method for using payload management and refers to Permit Part 3, Section 3.3.3, for calculating TRU alpha activity. Payload management falls under the general statement “Generator/storage sites package TRU mixed waste in a manner that meets transportation and radiological limits, and the resulting container volume after packaging is usually much larger than the LWA TRU waste VOR” on page 3 of the Permit Modification Request.
- b. Payload management does not increase the total TRU alpha activity concentration for the waste stream and therefore does not change the VOR. This is because the calculation for TRU alpha activity is unrelated to the waste volume (i.e., it is based on the weight of the waste and the TRU alpha activity) as shown below in an excerpt from the WIPP TRU WAC. Please note that TMU in the excerpt below is an acronym for total measurement uncertainty.

3.3.3 TRU Alpha Activity Concentration

Acceptance Criterion. TRU waste payload containers shall contain more than 100 nCi/g of alpha-emitting TRU isotopes with half-lives greater than 20 years. Without taking into consideration the TMU, the TRU alpha activity concentration for a payload container is determined by dividing the TRU alpha activity of the waste by the weight of the waste...

¹⁴ DOE 2016. Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant. DOE/WIPP-02-3122. Appendix E. Carlsbad Field Office. Carlsbad, NM. July 2016. URL: <http://www.wipp.energy.gov/library/wac/WAC.pdf>.

REFERENCES

DOE. 1980. Final Environmental Impact Statement. Waste Isolation Pilot Plant. DOE/EIS-0026. Volume 1. Washington, D.C.

DOE. 1981. Waste Isolation Pilot Plant (WIPP), Record of Decision. 46 Fed. Reg. 9162. Washington, D.C. January 1981.

DOE. 1981. Consultation and Cooperation Agreements. Carlsbad Field Office. Carlsbad, NM.
http://www.wipp.energy.gov/library/Information_Repository_A/Supplemental_Information/Consultation%20and%20Cooperation%20Agreement.pdf.

DOE. 1995. *Resource Conservation and Recovery Act (RCRA)* Part B Permit Application DOE/WIPP 91-005, Rev. 6. Appendix D1. Carlsbad, NM. May 1995.

DOE. 1997. Waste Isolation Pilot Plant Disposal Phase Final Supplemental Environmental Impact Statement Eddy County, near Carlsbad, New Mexico. DOE/EIS-0026-S2. Washington, D.C. September 1997.

DOE 2016. Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant. DOE/WIPP-02-3122. Carlsbad Field Office. Carlsbad, NM. July 2016. URL:
<http://www.wipp.energy.gov/library/wac/WAC.pdf>.

DOE 2017. Quality Assurance Program Document, DOE/CBFO-94-1012, Revision 13. Carlsbad, NM. April 2017. http://www.wipp.energy.gov/library/qapd/DOE-CBFO-94-1012_Rev_13_Eff_04-20-17.pdf.

Environmental Law Reporter. 1984. Legal Environmental Assistance Foundation, Inc. v. Hodel. 14 ELR 20425, No. 3-83-562 (E.D. Tenn. April 13, 1984) <http://elr.info/sites/default/files/litigation/14.20425.htm>.

U.S. Congress. 1992. Waste Isolation Pilot Plant Land Withdrawal Act of 1992. Public Law 102-579. Washington, D.C.

U.S. Congress. 1996. Waste Isolation Pilot Plant Land Withdrawal Act Amendments. Public Law 104-201. Washington, D.C.

U.S. Environmental Protection Agency. 1982. Federal Facilities Compliance Act Table.
<https://www.epa.gov/fedfac/federal-facilities-compliance-act-table>.

U.S. House of Representatives. 1992. H.R.2637. Waste Isolation Pilot Plant Land Withdrawal Act (Reported in House - RH).

U.S. Senate. 1991. S1671. Waste Isolation Pilot Plant Land Withdrawal Act (Enrolled).

ATTACHMENT 1:
AGENCIES THAT OVERSEE
THE PERMITTEES
(3 Pages)

Waste Isolation Pilot Plant Oversight Agencies

Congress

- The Waste Isolation Pilot Plant (WIPP) Land Withdrawal Act (LWA) of 1992 (Public Law 102-579, and as amended by Public Law 104-201, H.R. 3230, 104th Congress) requires amendments to the Land Management Plan to be provided to Congress and the State.
- Congress reviews and approves the WIPP budget annually
- Government Accountability Office performs periodic investigations for Congress

United States Environmental Protection Agency

- Has certification and recertification authority regarding the WIPP Compliance Recertification Decision
- Performs inspections and reviews generator site characterization programs
- Performs Inspections at the WIPP facility
- Is responsible for the Conditions of Approval for Polychlorinated Biphenyls (PCB)/Transuranic (TRU) and PCB/TRU Mixed Waste Disposal at the WIPP facility under Toxic Substances Control Act (TSCA)
- May 16, 1995 Memorandum of Understanding Between the U.S. Environmental Protection Agency and The U.S. Department of Energy (DOE) concerning the Clean Air Act Emission Standards for Radionuclides 40 Code of Federal Regulations (CFR) Part 61 Including Subparts H, I, Q & T
- Reviews proposed changes to the WIPP certification basis to determine impact to the most recent Certification or Recertification Decision
- Reviews annual change reports
- Reviews Biennial Environmental Compliance Report (BECR) and issues decision regarding compliance

Department of Energy/Carlsbad Field Office (CBFO)

- Responsible for implementing the laws issued by Congress. For example:
 - WIPP Land Withdrawal Act of 1992
 - Department of Energy Organization Act of 1977
 - National Environmental Policy Act of 1969
- Responsible for implementing DOE Code of Federal Regulations (CFR)
 - Responsible for implementing 10 CFR 830, Nuclear Safety Management
 - Approves the WIPP Documented Safety Analysis
 - Responsible for implementing 10 CFR 851, Worker Safety and Health Program
 - Responsible for implementing 10 CFR 835, Occupational Radiation Protection
 - Responsible for implementing 10 CFR Part 1021, National Environmental Policy Act Implementing Procedures for DOE
 - Issues the Environmental Impact Statements (EISs) and associated Records of Decision (RODs)
 - Issues the Supplemental Environmental Impact Statements (SEISs) and associated RODs
- Imposes contract requirements on the Management and Operating Contractor regarding implementation of DOE CFRs and DOE Orders
- Department of Energy Inspector General office performs periodic investigations for DOE/CBFO

- Department of Energy Headquarters functions perform periodic Quality Assurance and technical assessments of DOE/CBFO
- Audits generator/storage sites and contractors

State of New Mexico/New Mexico Environment Department (NMED) (includes but not limited to)

- Has responsibility for Resource Conservation and Recovery Act program in New Mexico
 - Hazardous Waste Facility Permit
 - Information Repository (public involvement)
 - Stakeholder email-notification (public involvement)
 - Annual inspections
 - Observes annual waste recertification audits
 - Approves final audit reports
 - Review and approve Permit modifications (public involvement) for example:
 - Reviews Permit Modification Requests for Hazardous Waste Management Units (storage units and disposal units)
 - Inspects compliance with 90-day accumulation requirements
 - Annual inspections
- Has responsibility for the WIPP New Mexico Discharge Permit Number DP-831
- Requires testing and reporting under the New Mexico Drinking Water Regulations
- Requires monitoring and operation under Petroleum Storage Tank Permit
- Permit for backup diesel generators
- NMED DOE Oversight Bureau participates in environmental monitoring
- Joint developer of the Land Management Plan
- Requires triennial review and report of environmental compliance activities
- The Consultation and Cooperation Agreement contains specific oversight responsibilities

Nuclear Regulatory Commission

- Issues Certificates of Compliance for Type B Packagings including:
 - TRUPACT-II
 - TRUPACT-III
 - HalfPACT
 - RH-TRU 72-B
 - 10-106B

Defense Nuclear Facility Safety Board

- Provides independent analysis, advice, and recommendations to the Secretary of Energy regarding nuclear operations regarding adequate protection of public health and safety and worker safety

Mine Safety and Health Administration

- Provides oversight of WIPP underground facility operations pursuant to the Land Withdrawal Act

Occupational Safety and Health Administration/National Institute of Occupational Safety and Health

- Reviews emergency response training for shipment corridors

Department of Interior/Bureau of Land Management

- Manages the grazing activities on the WIPP site
- Joint developer of the Land Management Plan
- Issues permits for bird management (banding)

Corridor States (e.g., Western Governors Association, Southern States Energy Board)

- Establish and approve non-interstate highway routes for waste shipments
- Reviews emergency response training for shipment corridors

Changes to Permit Attachment B, Hazardous Waste Permit Application Part A

Changes to Permit Attachment B, Hazardous Waste Permit Application Part A

- Changed the total page number on page B-ii from “45” to “52.”
- Replaced the RCRA Subtitle Site Identification Form and Hazardous Waste Permit Part A Form with the new EPA approved forms.
- RCRA Subtitle C. Site Identification Form, Item 10.B. Waste Codes for Federally Regulated Hazardous Wastes
 - Reorganized list based on guidance from the instructions (i.e., in the order they appear in the regulations [D, F, P, U]).
- Hazardous Waste Permit Part A Form, Item 7. Description of Hazardous Wastes
 - Reorganized list based on guidance from the instructions (i.e., in the order they appear in the regulations [D, F, P, U])
- Added continuation page for Item 6. Process Codes and Design Capacities
- Narrative to Item 6. Process Codes and Design Capacities
 - Added “EPA ID Number:” to the top of the page.
 - Added “Hazardous Waste Permit Part A Form” to the top of the page.
 - Replaced “7. PROCESS—CODES AND DESIGN CAPACITIES (continued)” with “Narrative to Item 6. Process Codes and Design Capacities.”
 - Changed “Section 7 B” to “Item 6, *Process Codes and Design Capacities*” in 3 places.
 - Added continuation page number.
 - Added “EPA ID Number: NM4890139088” to the top of the second continuation page for Item 6.
 - Added “Hazardous Waste Permit Part A Form” to the top of the second continuation page for Item 6.
 - Added “Narrative to Item 6. Process Codes and Design Capacities (continued)” to the top of the second continuation page for Item 6.
 - Changed “Section 7 B” to “Item 6, *Process Codes and Design Capacities*.”
 - Added continuation page number.
- Added continuation page for Item 7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)) (continued)
- RCRA Part A Application Certification
 - Deleted “original on file” language and signatory dates.

Redline Strikeout

ATTACHMENT B
HAZARDOUS WASTE PERMIT APPLICATION PART A

(This page intentionally blank)

ATTACHMENT B

HAZARDOUS WASTE PERMIT APPLICATION PART A

TABLE OF CONTENTS

PART A - HAZARDOUS WASTE PERMIT APPLICATION	1
RCRA PART A APPLICATION CERTIFICATION.....	14
APPENDIX B1 OTHER ENVIRONMENTAL PERMITS.....	15
APPENDIX B2 MAPS	27
Figure B2-1 General Location of the WIPP Facility.....	29
Figure B2-2 Planimetric Map-WIPP Facility Boundaries.....	30
Figure B2-2a Legend to Figure B2-2.....	31
Figure B2-3 Topographic Map	32
APPENDIX B3 FACILITIES	33
Figure B3-1 Spatial View of the WIPP Facility	35
Figure B3-2 Repository Horizon	36
Figure B3-3 Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Areas.....	37
Figure B3-4 Parking Area-Container Storage and Surge Areas	38
APPENDIX B4 PHOTOGRAPHS	39
Figure B4-1 Aerial Photograph of the Waste Isolation Pilot Plant.....	41
Figure B4-2 Underground - Panel One - Waste Disposal Room.....	42
Figure B4-3 Aerial Photograph of the Waste Handling Building	43
Figure B4-4 TRUDOCKs in CH Bay of the Waste Handling Building.....	44
Figure B4-5 NE Corner of CH Bay of the Waste Handling Building	45
Figure B4-6 Westward View of CH Bay of the Waste Handling Building	46
Figure B4-7 Waste Shaft Conveyance - Loading Facility Pallet with CH Waste, Waste Handling Building.....	47
Figure B4-8 RH Bay (Photo Taken July 2000)	48
Figure B4-9 Cask Unloading Room and Bridge Crane	49
Figure B4-10 Hot Cell.....	50
Figure B4-11 Transfer Cell.....	51
Figure B4-12 Facility Cask Loading Room and Facility Cask Rotating Device	52

(This page intentionally blank)

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

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8

OMB#: 2050-0024; Expires 01/31/2017

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; Complete all parts 1-10.	
1. Generator of Hazardous Waste If "Yes," mark only one of the following – a, b, or c. <input checked="" type="checkbox"/> a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material. <input type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste. <input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste. If "Yes" above, indicate other generator activities in 2-10.	5. Transporter of Hazardous Waste If "Yes," mark all that apply. <input type="checkbox"/> a. Transporter <input type="checkbox"/> b. Transfer Facility (at your site)
2. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.	6. Treater, Storer, or Disposer of Hazardous Waste Note: A hazardous waste Part B permit is required for these activities.
3. United States Importer of Hazardous Waste	7. Recycler of Hazardous Waste
4. Mixed Waste (hazardous and radioactive) Generator	8. 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
	9. Underground Injection Control
	10. Receives Hazardous Waste from Off-site
B. Universal Waste Activities; Complete all parts 1-2.	
1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.	
a. Batteries	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>
c. Mercury containing equipment	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>
2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.	
C. Used Oil Activities; Complete all parts 1-4.	
1. Used Oil Transporter If "Yes," mark all that apply. <input type="checkbox"/> a. Transporter <input type="checkbox"/> b. Transfer Facility (at your site)	
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	
3. Off-Specification Used Oil Burner	
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	

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8

OMB# 2050-0024; Expires 01/31/2017

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

☐ a. College or University

☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y ☐ N ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. 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	D019	D033	F001	P030	U043	U108
D005	D021	D034	F002	P098	U044	U122
D006	D022	D035	F003	P099	U052	U133
D007	D026	D036	F004	P106	U070	U134
D008	D027	D037	F005	P120	U072	U151
D009	D028	D038	F006	U002	U078	U154
D010	D029	D039	F007	U003	U079	U159
D011	D030	D040	F009	U019	U103	U196
D018	D032	D043	P015	U037	U105	More Codes Attch.

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated 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.

EPA ID Number NM4890139088

Additional Hazardous Waste Numbers from Section 11						
U209						
U210						
U220						
U226						
U228						
U239						

EPA ID Number NM 41890139088

OMB#: 2050-0024; Expires 01/31/2017

United States Environmental Protection Agency		
HAZARDOUS WASTE PERMIT INFORMATION FORM		
1. Facility Permit Contact	First Name: Todd	MI: A Last Name: Shrader
	Contact Title: Manager, Carlsbad Field Office	
	Phone: (575)234-7300	Ext.: Email: Todd.Shrader@cbfo.doe.gov
2. Facility Permit Contact Mailing Address	Street or P.O. Box: P.O. Box 3090	
	City, Town, or Village: Carlsbad	
	State: NM	
	Country: USA	Zip Code: 88221
3. Operator Mailing Address and Telephone Number	Street or P.O. Box: P.O. Box 3090	
	City, Town, or Village: Carlsbad	
	State: NM	Phone: (575)234-7300
	Country: USA	Zip Code: 88221
4. Facility Existence Date	Facility Existence Date (mm/dd/yyyy): 05/18/1981	
5. Other Environmental Permits		
A. Facility Type (Enter code)	B. Permit Number	C. Description
		See Permit Attachment B, Appendix B1
6. Nature of Business: The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility which entails receiving, unloading, and transferring radioactive-mixed waste from the surface of the site to the underground hazardous waste management units. Waste will be emplaced in an underground geologic repository horizon located in a deep-bedded salt formation approximately 2,150 feet beneath the surface.		

1
2
3

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8

OMB#: 2050-0024; Expires 01/31/2017

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity	Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal			Treatment (Continued) (for T81 – T94)		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
Storage			T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
S99	Other Storage	Any Unit of Measure Listed Below	T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Treatment			Miscellaneous (Subpart X)		
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Metric Tons Per Day; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below
Unit of Measure	Unit of Measure Code	Unit of Measure	Unit of Measure Code	Unit of Measure	Unit of Measure Code
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour.....	E	Short Tons Per Day	N	Cubic Meters.....	C
Gallons Per Day	U	Metric Tons Per Hour	W	Acres	B
Liters.....	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour.....	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day.....	V	Kilograms Per Hour.....	X	Hectare-meter	F
		Million BTU Per Hour.....	X	BTU Per Hour.....	I

[illegible]

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8

OMB#: 2050-0024; Expires 01/31/2017

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item 9.D(1).
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
- In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
				(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))			
X 1	K 0 5 4	900	P	T	0	3	D	8	0				
X 2	D 0 0 2	400	P	T	0	3	D	8	0				
X 3	D 0 0 1	100	P	T	0	3	D	8	0				
X 4	D 0 0 2												Included With Above

Page 4 of 6

EPA ID Number N M 4 8 9 0 1 3 9 0 8 8

OMB#: 2050-0024; Expires 01/31/2017

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)																	
Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									
	1	F	0	0	1	1891	M	X	0	4	S	0	1	S	0	1	
	2	F	0	0	2	1860	M	X	0	4	S	0	1	S	0	1	
	3	F	0	0	3	1593	M	X	0	4	S	0	1	S	0	1	
	4	F	0	0	4	26	M	X	0	4	S	0	1	S	0	1	
	5	F	0	0	5	1829	M	X	0	4	S	0	1	S	0	1	
	6	F	0	0	6	915	M	X	0	4	S	0	1	S	0	1	
	7	F	0	0	7	915	M	X	0	4	S	0	1	S	0	1	
	8	F	0	0	9	915	M	X	0	4	S	0	1	S	0	1	
	9	D	0	0	4	903	M	X	0	4	S	0	1	S	0	1	
1	0	D	0	0	5	484	M	X	0	4	S	0	1	S	0	1	
1	1	D	0	0	6	1819	M	X	0	4	S	0	1	S	0	1	
1	2	D	0	0	7	1248	M	X	0	4	S	0	1	S	0	1	
1	3	D	0	0	8	3246	M	X	0	4	S	0	1	S	0	1	
1	4	D	0	0	9	1727	M	X	0	4	S	0	1	S	0	1	
1	5	D	0	1	0	186	M	X	0	4	S	0	1	S	0	1	
1	6	D	0	1	1	1090	M	X	0	4	S	0	1	S	0	1	
1	7	D	0	1	8	749	M	X	0	4	S	0	1	S	0	1	
1	8	D	0	1	9	761	M	X	0	4	S	0	1	S	0	1	
1	9	D	0	2	1	26	M	X	0	4	S	0	1	S	0	1	
2	0	D	0	2	2	1098	M	X	0	4	S	0	1	S	0	1	
2	1	D	0	2	6	609	M	X	0	4	S	0	1	S	0	1	
2	2	D	0	2	7	26	M	X	0	4	S	0	1	S	0	1	
2	3	D	0	2	8	449	M	X	0	4	S	0	1	S	0	1	
2	4	D	0	2	9	478	M	X	0	4	S	0	1	S	0	1	
2	5	D	0	3	0	26	M	X	0	4	S	0	1	S	0	1	
2	6	D	0	3	2	26	M	X	0	4	S	0	1	S	0	1	
2	7	D	0	3	4	26	M	X	0	4	S	0	1	S	0	1	
2	8	D	0	3	5	139	M	X	0	4	S	0	1	S	0	1	
2	9	D	0	3	6	26	M	X	0	4	S	0	1	S	0	1	
3	0	D	0	3	7	26	M	X	0	4	S	0	1	S	0	1	
3	1	D	0	3	8	26	M	X	0	4	S	0	1	S	0	1	
3	2	D	0	3	9	26	M	X	0	4	S	0	1	S	0	1	
3	3	D	0	4	0	140	M	X	0	4	S	0	1	S	0	1	
3	4	D	0	4	3	26	M	X	0	4	S	0	1	S	0	1	
3	5	P	0	1	5	945	M	X	0	4	S	0	1	S	0	1	
3	6	U	0	0	2	344	M	X	0	4	S	0	1	S	0	1	

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB#: 2050-0024; Expires 01/31/2017

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)																	
Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)			
3	7	U	0	1	9	344	M	X	0	4	S	0	1	S	0	1	
3	8	U	0	3	7	344	M	X	0	4	S	0	1	S	0	1	
3	9	U	0	4	3	344	M	X	0	4	S	0	1	S	0	1	
4	0	U	0	4	4	344	M	X	0	4	S	0	1	S	0	1	
4	1	U	0	5	2	344	M	X	0	4	S	0	1	S	0	1	
4	2	U	0	7	0	344	M	X	0	4	S	0	1	S	0	1	
4	3	U	0	7	2	344	M	X	0	4	S	0	1	S	0	1	
4	4	U	0	7	8	344	M	X	0	4	S	0	1	S	0	1	
4	5	U	0	7	9	344	M	X	0	4	S	0	1	S	0	1	
4	6	U	1	0	5	344	M	X	0	4	S	0	1	S	0	1	
4	7	U	1	2	2	344	M	X	0	4	S	0	1	S	0	1	
4	8	U	1	3	3	344	M	X	0	4	S	0	1	S	0	1	
4	9	U	1	5	1	344	M	X	0	4	S	0	1	S	0	1	
5	0	U	1	5	4	344	M	X	0	4	S	0	1	S	0	1	
5	1	U	1	5	9	344	M	X	0	4	S	0	1	S	0	1	
5	2	U	1	9	6	344	M	X	0	4	S	0	1	S	0	1	
5	3	U	2	0	9	344	M	X	0	4	S	0	1	S	0	1	
5	4	U	2	1	0	344	M	X	0	4	S	0	1	S	0	1	
5	5	U	2	2	0	344	M	X	0	4	S	0	1	S	0	1	
5	6	U	2	2	6	344	M	X	0	4	S	0	1	S	0	1	
5	7	U	2	2	8	344	M	X	0	4	S	0	1	S	0	1	
5	8	U	2	3	9	344	M	X	0	4	S	0	1	S	0	1	
5	9	P	1	2	0	344	M	X	0	4	S	0	1	S	0	1	
6	0	U	1	3	4	344	M	X	0	4	S	0	1	S	0	1	
6	1	D	0	3	3	344	M	X	0	4	S	0	1	S	0	1	
6	2	P	0	3	0	344	M	X	0	4	S	0	1	S	0	1	
6	3	9	0	9	8	344	M	X	0	4	S	0	1	S	0	1	
6	4	P	0	9	9	344	M	X	0	4	S	0	1	S	0	1	
6	5	P	1	0	6	344	M	X	0	4	S	0	1	S	0	1	
6	6	U	0	0	3	344	M	X	0	4	S	0	1	S	0	1	
6	7	U	1	0	3	344	M	X	0	4	S	0	1	S	0	1	
6	8	U	1	0	8	344	M	X	0	4	S	0	1	S	0	1	


EPA ID Number NM4890139088

OMB#: 2050-0024; Expires 01/31/2017

10. 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.
11. Facility Drawing
All existing facilities must include a scale drawing of the facility (see instructions for more detail).
12. 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).
13. Comments
See narrative to RCRA Subtitle C Site Identification Form, Section 7. PROCESS - CODES AND DESIGN CAPACITIES (continued).

Page 6 of 6

OMB# 2050-0024; Expires 05/31/2020

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 an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of > 1,000 kg of 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 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 30 miles east of Carlsbad on Jal Highway		
City, Town, or Village Carlsbad	County Eddy	
State NM	Country USA	Zip Code 88221

5. Site Mailing Address

☐ Same as Location 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.

EPA ID Number

N	M	4	8	9	0	1	3	9	0	8	8
---	---	---	---	---	---	---	---	---	---	---	---

OMB# 2050-0024; Expires 05/31/2020

8. Site Contact Information

☐ Same as Location Address

First Name	Todd	MI	A	Last Name	Shrader
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	Todd.Shrader@cbfo.doe.gov				
Phone	(575) 234-7300	Ext		Fax	(575) 234-7027

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)	05/18/1981
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	Todd.Shrader@cbfo.doe.gov		
Phone	(575) 234-7300	Ext	
Fax	(575) 234-7027		
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)	05/18/1981
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	Todd.Shrader@cbfo.doe.gov		
Phone	(575) 234-7300	Ext	
Fax	(575) 234-7027		
Comments	See Item 18, Comments, for additional operator.		

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

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 (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<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.
If "Yes" above, indicate other generator activities in 2 and 3, as applicable.		
<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.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	3. Mixed Waste (hazardous and radioactive) Generator	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Treater, Storer or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for these activities.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	5. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. 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	7. 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.

EPA ID Number

N M 4 8 9 0 1 3 9 0 8 8

OMB# 2050-0024; Expires 05/31/2020

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. Other (specify) _____
<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

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories—If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<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 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 VSQGs 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	A. Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker

<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?
--	--

EPA ID Number

N	M	4	8	9	0	1	3	9	0	8	8
---	---	---	---	---	---	---	---	---	---	---	---

OMB# 2050-0024; Expires 05/31/2020

18. Comments (include item number for each comment)

Section 9.B (continued):		
Full Name: Nuclear Waste Partnership LLC		
Date Became Operator (mm/dd/yyyy): 10/01/2012		
Operator Type: Private		
Street Address: P.O. Box 2078		
City, Town, or Village: Carlsbad		
State: NM	Country: USA	Zip Code: 88221
Email: Bruce.Covert@wipp.ws		
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	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Todd A. Shrader	Title Manager, Carlsbad Field Office (CBFO)
Email Todd.Shrader@cbfo.doe.gov	
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Bruce C. Covert	Title Project Manager, Nuclear Waste Partnership LLC
Email Bruce.Covert@wipp.ws	

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

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)

05/18/1981

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 which entails receiving, unloading, and transferring radioactive mixed waste from the surface of the site to the underground hazardous waste management units. Waste is emplaced in an underground geologic repository horizon located in a deep-bedded salt formation approximately 2,150 feet beneath the surface.

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

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		
1	X	0	4		18000.00	C	002	Panels 1 and 2
2	X	0	4		18750.00	C	001	Panel 3
3	X	0	4		19106.00	C	001	Panel 4
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												(2) Process Description (if code is not entered in 7.D.1)
								(1) Process Codes												
	1	D	0	0	4	903	M	X	0	4	S	0	1	S	0	1				
	2	D	0	0	5	484	M	X	0	4	S	0	1	S	0	1				
	3	D	0	0	6	1819	M	X	0	4	S	0	1	S	0	1				
	4	D	0	0	7	1248	M	X	0	4	S	0	1	S	0	1				
	5	D	0	0	8	3246	M	X	0	4	S	0	1	S	0	1				
	6	D	0	0	9	1727	M	X	0	4	S	0	1	S	0	1				
	7	D	0	1	0	186	M	X	0	4	S	0	1	S	0	1				
	8	D	0	1	1	1090	M	X	0	4	S	0	1	S	0	1				
	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.

- 1 EPA ID Number: NM4890139088
- 2 Hazardous Waste Permit Part A Form
- 3 6. Process Codes and Design Capacities (continued)

<u>Line Numbers</u>	<u>A. Process Code</u>				<u>B. Process Design Capacity</u>		<u>C. Process Total Number of Units</u>	<u>D. Unit Name</u>
					<u>(1) Amount</u>	<u>(2) Unit of Measure</u>		
<u>5</u>	<u>X</u>	<u>0</u>	<u>4</u>		<u>19284.00</u>	<u>C</u>	<u>001</u>	<u>Panel 6</u>
<u>6</u>	<u>X</u>	<u>0</u>	<u>4</u>		<u>19400.00</u>	<u>C</u>	<u>002</u>	<u>Panels 7 and 8</u>
<u>7</u>	<u>S</u>	<u>0</u>	<u>1</u>		<u>194.1</u>	<u>C</u>	<u>001</u>	<u>Waste Handling Building Unit</u>
<u>8</u>	<u>S</u>	<u>0</u>	<u>1</u>		<u>242.0</u>	<u>C</u>	<u>001</u>	<u>Parking Area Unit</u>

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities7. ~~PROCESS CODES AND DESIGN CAPACITIES (continued)~~

The Waste Isolation Pilot Plant (WIPP) geologic repository is defined as a “miscellaneous unit” under 40 CFR §260.10. “Miscellaneous unit” means a hazardous waste management unit where hazardous waste is treated, stored, or disposed of and that is not a container, tank, surface impoundment, waste pile, land treatment unit, landfill, incinerator, containment building, boiler, industrial furnace, or underground injection well with appropriate technical standards under 40 CFR Part 146, corrective action management unit, or unit eligible for research, development, and demonstration permit under 40 CFR §270.65. The WIPP is a geologic repository designed for the disposal of defense-generated transuranic (TRU) waste. Some of the TRU wastes disposed of at the WIPP contain hazardous wastes as co-contaminants. More than half the waste to be disposed of at the WIPP also meets the definition of debris waste. The debris categories include manufactured goods, biological materials, and naturally occurring geological materials. Approximately 120,000 cubic meters (m^3) of the 175,600 m^3 70 percent of WIPP wastes anticipated for disposal in the WIPP repository is categorized as debris waste. The geologic repository has been divided into ten discrete hazardous waste management units (HWMU) which are being permitted under 40 CFR Part 264, Subpart X.

For purposes of this application, all TRU waste is managed as though it were mixed. During the Disposal Phase of the facility, which is expected to last 25 years, the ~~total amount of waste received from off-site generators and any derived~~ emplaced TRU mixed waste volume will be limited to 175,600 m^3 of TRU waste of which up to 7,080 m^3 may be remote-handled (RH) TRU mixed waste not exceed the design capacity specified in Item 6. Process Codes and Design Capacities. ~~For purposes of this application, all TRU waste is managed as though it were mixed. This volume is calculated based on the volumes of the outermost disposal containers and cannot exceed 151,135 m^3 for Panels 1 through 8. The Land Withdrawal Act (LWA) TRU waste volume of record is tracked and reported, separately from the Permit, by the DOE for the purposes of compliance with the WIPP LWA total capacity limit for TRU waste of 6.2 million ft^3 (175,564 m^3).~~

The process design capacities for each of the miscellaneous unit (composed of ten underground HWMUs in the geologic repository) eight underground HWMUs in the geologic repository (i.e., miscellaneous unit) are shown in Section 7-B Item 6. Process Codes and Design Capacities, is for the maximum amount of waste that may be received from off-site generators plus the maximum expected amount of derived wastes that may be generated at the WIPP facility. In addition, two HWMUs have been designated as container storage units (S01) in Section 7-B Item 6. Process Codes and Design Capacities. One is inside the Waste Handling Building (WHB) and consists of the contact-handled (CH) bay, waste shaft conveyance loading room, waste shaft conveyance entry room, RH bay, cask unloading room, hot cell, transfer cell, and facility cask loading room. This HWMU will be used for waste receipt, handling, and storage (including storage of derived waste) prior to emplacement in the underground geologic repository. No treatment or disposal will occur in this S01 HWMU. The capacity of this S01 unit for storage is 194.1 m^3 , based on 36 ten-drum overpacks on 18 facility pallets, four CH Packages at the TRUDOCKs, one standard waste box of derived waste, two loaded casks and one 55-gallon drum of derived waste in the RH Bay, one loaded cask in the Cask Unloading

Room, 13 55-gallon drums in the Hot Cell, one canister in the Transfer Cell and one canister in the Facility Cask Unloading Room. The second S01 HWMU is the parking area outside the WHB where the Contact- and Remote-Handled Package trailers and the road cask trailers will be parked awaiting waste handling operations. The capacity of this unit is 50 Contact-Handled Packages and twelve Remote-Handled Packages with a combined TRU mixed waste volume of 242 m³.

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities (continued)

The HWMUs are shown in Figures B3-2, B3-3, and B3-4.

During the ten-year period of the permit, a CH TRU mixed waste volume of up to 148,500 m³ of ~~CH TRU mixed waste~~ could be emplaced in Panels 1 to 8 and an RH TRU mixed waste volume up to 2,635 m³ of ~~RH TRU mixed waste~~ could be emplaced in Panels 4 to 8 for a total of 151,135 m³, as shown in Item 6, Process Codes and Design Capacities. Panels 9 and 10 will be constructed under the initial term of this permit. These latter areas will not receive waste for disposal under this permit.

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

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

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes												(2) Process Description (if code is not entered in 7.D1))
	(1) Process Codes																			
1	1	D	0	2	1	26	M	X	0	4	S	0	1	S	0	1				
1	2	D	0	2	2	1098	M	X	0	4	S	0	1	S	0	1				
1	3	D	0	2	6	609	M	X	0	4	S	0	1	S	0	1				
1	4	D	0	2	7	26	M	X	0	4	S	0	1	S	0	1				
1	5	D	0	2	8	449	M	X	0	4	S	0	1	S	0	1				
1	6	D	0	2	9	478	M	X	0	4	S	0	1	S	0	1				
1	7	D	0	3	0	26	M	X	0	4	S	0	1	S	0	1				
1	8	D	0	3	2	26	M	X	0	4	S	0	1	S	0	1				
1	9	D	0	3	3	344	M	X	0	4	S	0	1	S	0	1				
2	0	D	0	3	4	26	M	X	0	4	S	0	1	S	0	1				
2	1	D	0	3	5	139	M	X	0	4	S	0	1	S	0	1				
2	2	D	0	3	6	26	M	X	0	4	S	0	1	S	0	1				
2	3	D	0	3	7	26	M	X	0	4	S	0	1	S	0	1				
2	4	D	0	3	8	26	M	X	0	4	S	0	1	S	0	1				
2	5	D	0	3	9	26	M	X	0	4	S	0	1	S	0	1				
2	6	D	0	4	0	140	M	X	0	4	S	0	1	S	0	1				
2	7	D	0	4	3	26	M	X	0	4	S	0	1	S	0	1				
2	8	F	0	0	1	1891	M	X	0	4	S	0	1	S	0	1				
2	9	F	0	0	2	1860	M	X	0	4	S	0	1	S	0	1				
3	0	F	0	0	3	1593	M	X	0	4	S	0	1	S	0	1				
3	1	F	0	0	4	26	M	X	0	4	S	0	1	S	0	1				
3	2	F	0	0	5	1829	M	X	0	4	S	0	1	S	0	1				
3	3	F	0	0	6	915	M	X	0	4	S	0	1	S	0	1				
3	4	F	0	0	7	915	M	X	0	4	S	0	1	S	0	1				
3	5	F	0	0	9	915	M	X	0	4	S	0	1	S	0	1				
3	6	P	0	1	5	945	M	X	0	4	S	0	1	S	0	1				
3	7	P	0	3	0	344	M	X	0	4	S	0	1	S	0	1				
3	8	P	0	9	8	344	M	X	0	4	S	0	1	S	0	1				
3	9	P	0	9	9	344	M	X	0	4	S	0	1	S	0	1				
4	0	P	1	0	6	344	M	X	0	4	S	0	1	S	0	1				
4	1	P	1	2	0	344	M	X	0	4	S	0	1	S	0	1				
4	2	U	0	0	2	344	M	X	0	4	S	0	1	S	0	1				
4	3	U	0	0	3	344	M	X	0	4	S	0	1	S	0	1				
4	4	U	0	1	9	344	M	X	0	4	S	0	1	S	0	1				
4	5	U	0	3	7	344	M	X	0	4	S	0	1	S	0	1				

Page 8d

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

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

<u>Line No.</u>	<u>A. EPA Hazardous Waste No.</u>					<u>B. Estimated Annual Qty of Waste</u>	<u>C. Unit of Measure</u>	<u>D. Processes</u>												<u>(2) Process Description (if code is not entered in 7.D1))</u>
								<u>(1) Process Codes</u>												
<u>4</u>	<u>6</u>	<u>U</u>	<u>0</u>	<u>4</u>	<u>3</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>4</u>	<u>7</u>	<u>U</u>	<u>0</u>	<u>4</u>	<u>4</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>4</u>	<u>8</u>	<u>U</u>	<u>0</u>	<u>5</u>	<u>2</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>4</u>	<u>9</u>	<u>U</u>	<u>0</u>	<u>7</u>	<u>0</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>0</u>	<u>U</u>	<u>0</u>	<u>7</u>	<u>2</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>1</u>	<u>U</u>	<u>0</u>	<u>7</u>	<u>8</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>2</u>	<u>U</u>	<u>0</u>	<u>7</u>	<u>9</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>3</u>	<u>U</u>	<u>1</u>	<u>0</u>	<u>3</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>4</u>	<u>U</u>	<u>1</u>	<u>0</u>	<u>5</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>5</u>	<u>U</u>	<u>1</u>	<u>0</u>	<u>8</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>6</u>	<u>U</u>	<u>1</u>	<u>2</u>	<u>2</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>7</u>	<u>U</u>	<u>1</u>	<u>3</u>	<u>3</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>8</u>	<u>U</u>	<u>1</u>	<u>3</u>	<u>4</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>5</u>	<u>9</u>	<u>U</u>	<u>1</u>	<u>5</u>	<u>1</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>0</u>	<u>U</u>	<u>1</u>	<u>5</u>	<u>4</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>1</u>	<u>U</u>	<u>1</u>	<u>5</u>	<u>9</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>2</u>	<u>U</u>	<u>1</u>	<u>9</u>	<u>6</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>3</u>	<u>U</u>	<u>2</u>	<u>0</u>	<u>9</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>4</u>	<u>U</u>	<u>2</u>	<u>1</u>	<u>0</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>5</u>	<u>U</u>	<u>2</u>	<u>2</u>	<u>0</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>6</u>	<u>U</u>	<u>2</u>	<u>2</u>	<u>6</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>7</u>	<u>U</u>	<u>2</u>	<u>2</u>	<u>8</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				
<u>6</u>	<u>8</u>	<u>U</u>	<u>2</u>	<u>3</u>	<u>9</u>	<u>344</u>	<u>M</u>	<u>X</u>	<u>0</u>	<u>4</u>	<u>S</u>	<u>0</u>	<u>1</u>	<u>S</u>	<u>0</u>	<u>1</u>				

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 Nuclear Waste Partnership LLC, the Management and Operating Contractor (MOC), has signed this application for the permitted facility as "co-operator."

The DOE has determined that dual signatures best reflect the actual apportionment of Resource Conservation and Recovery Act (RCRA) responsibilities as follows:

The DOE's RCRA responsibilities are for policy, programmatic directives, funding and scheduling decisions, Waste Isolation Pilot Plant (WIPP) requirements of DOE generator sites, auditing, and oversight of all other parties engaged in work at the WIPP, as well as general oversight.

The MOC's RCRA responsibilities are for certain day-to-day operations (in accordance with general directions given by the DOE and in the Management and Operating Contract as part of its general oversight responsibility), including, but not limited to, the following: certain waste handling, monitoring, record keeping, certain data collection, reporting, technical advice, and contingency planning.

For purposes of the certification required by Title 20 of the New Mexico Administrative Code, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, §270.11(d), the DOE's and the MOC's representatives certify, under penalty of law that this document and all attachments were prepared under their direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on their inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of their knowledge and belief, true, accurate, and complete for their respective areas of responsibility. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner and Operator Signature: Original signed by Todd A. Shrader
Title: Manager, Carlsbad Field Office
for: U.S. Department of Energy
Date: 06/12/2017

Co-Operator Signature: Original signed by Bruce C. Covert
Title: Project Manager
for: Nuclear Waste Partnership LLC
Date: 06/12/2017

1
2
3

**APPENDIX B1
OTHER ENVIRONMENTAL PERMITS**

1
2

(This page intentionally blank)

1

Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of June 2017

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
1.	Department of the Interior, Bureau of Land Management	Right-of-Way for Water Pipeline	NM053809	08/17/83 (Transferred 05/15/06 to City of Carlsbad)	In Perpetuity	Active
2.	Department of the Interior, Bureau of Land Management	Right-of-Way for the North Access Road	NM055676	08/23/83	In Perpetuity	Active
3.	Department of the Interior, Bureau of Land Management	Right-of-Way for Railroad	NM055699	09/27/83	In Perpetuity	Active
4.	Department of the Interior, Bureau of Land Management	Right-of-Way for Dosimetry and Aerosol Sampling Sites	NM063136	07/03/86	12/31/40	Active
5.	Department of the Interior, Bureau of Land Management	Right-of-Way for Seven Subsidence Monuments	NM065801	11/07/86	None	Active
6.	Department of the Interior, Bureau of Land Management	Right-of-Way for Aerosol Sampling Site	NM077921	08/18/89	08/18/19	Active
7.	Department of the Interior, Bureau of Land Management	Right-of-Way for 2 Survey Monuments	NM082245	12/13/89	12/13/19	Active
8.	Department of the Interior, Bureau of Land Management	Right-of-Way for telephone cable	NM046092	09/04/81 (Valor Telecom of NM LLC)	09/04/11	Active Renewal In Process
9.	Department of the Interior, Bureau of Land Management	Right-of-Way for SPS 115 KV Powerline	NM043203	10/19/81 (Southwestern Public Service)	12/31/40	Active
10.	Department of the Interior, Bureau of Land Management	Right-of-Way for South Access Road	NM123703	01/27/10	12/31/39	Active
11.	Department of the Interior, Bureau of Land Management	Right-of-Way for Duval telephone line	NM060174	03/08/85 (Valor Telecom of NM LLC)	03/08/35	Active
12.	Department of the Interior, Bureau of Land Management	Right-of-Way for groundwater monitor wells/pads	NM108365	08/30/02	08/30/32	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
13.	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Well C-2664 (Cabin Baby)	NM107944	04/23/02	04/23/32	Active
14.	Department of the Interior, Bureau of Land Management	Right-of-Way for Wells C-2725 (H-4A), C-2775 (H-4B), & C-2776 (H-4C)	NM-6-5 Cooperative Agreement	04/27/78	None	Active
15.	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Wells C-2723 (WIPP-25), C-2724 (WIPP-26), C-2722 (WIPP-27), C-2636 (WIPP-28), C-2743 (WIPP-29), & C-2727 (WIPP-30)	NM-6-5 Cooperative Agreement	07/14/78	None	Active
16.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for accessing state trust lands in Eddy & Lea Counties	RW-25430	09/28/04	09/27/16	Inactive
17.	Department of Interior, Bureau of Land Management	Right of Way for Valor Telecom	NM113339	08/09/05 (Valor Telecom Inc)	12/31/34	Active
18.	Department of Interior, Bureau of Land Management	Right of Way for South Access Road Fence	NM094304	03/15/95	None	Active
19.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way for High Volume Air Sampler	RW-22789	10/03/85	10/03/20	Active
20.	New Mexico Environment Department Groundwater Quality Bureau	Discharge Permit	DP-831	07/29/14	07/29/19	Active
21.	New Mexico Environment Department Air Quality Bureau	Operating Permit for two backup diesel generators	310-M-2	12/07/93	None	Active
22.	New Mexico Environment Department-Petroleum Storage Tank Bureau	Storage Tank Registration Certificate	Registration Number 1767 Facility Number 31539	07/01/16	06/30/17	Active
23.	Office of New Mexico State Engineer	Monitoring Well Exhaust Shaft Exploratory Borehole	C-2801	02/23/01	None	Inactive

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
24.	Office of New Mexico State Engineer	Monitoring Well Exhaust Shaft Exploratory Borehole	C-2802	02/23/01	None	Inactive
25.	Office of New Mexico State Engineer	Monitoring Well Exhaust Shaft Exploratory Borehole	C-2803	02/23/01	None	Inactive
26.	Office of New Mexico State Engineer	Monitoring Well	C-2811	03/02/02	None	Active
27.	Office of New Mexico State Engineer	Appropriation: WQSP-1 Well	C-2413	10/21/96	None	Active
28.	Office of New Mexico State Engineer	Appropriation: WQSP-2 Well	C-2414	10/21/96	None	Active
29.	Office of New Mexico State Engineer	Appropriation: WQSP-3 Well	C-2415	10/21/96	None	Active
30.	Office of New Mexico State Engineer	Appropriation: WQSP-4 Well	C-2416	10/21/96	None	Active
31.	Office of New Mexico State Engineer	Appropriation: WQSP-5 Well	C-2417	10/21/96	None	Active
32.	Office of New Mexico State Engineer	Appropriation: WQSP-6 Well	C-2418	10/21/96	None	Active
33.	Office of New Mexico State Engineer	Appropriation: WQSP-6a Well	C-2419	10/21/96	None	Active
34.	Office of New Mexico State Engineer	Monitoring Well AEC-7	C-2742	11/06/00	None	P&A
35.	Office of New Mexico State Engineer	Monitoring Well AEC-8	C-2744	11/06/00	None	P&A
36.	Office of New Mexico State Engineer	Monitoring Well Cabin Baby	C-2664	07/30/99	None	Active
37.	Office of New Mexico State Engineer	Monitoring Well DOE-1	C-2757	11/06/00	None	P&A
38.	Office of New Mexico State Engineer	Monitoring Well DOE-2	C-2682	04/17/00	None	Active
39.	Office of New Mexico State Engineer	Monitoring Well ERDA-9	C-2752	11/06/00	None	Active
40.	Office of New Mexico State Engineer	Monitoring Well H-1	C-2765	11/06/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
41.	Office of New Mexico State Engineer	Monitoring Well H-2A	C-2762	11/06/00	None	P&A
42.	Office of New Mexico State Engineer	Monitoring Well H-2B1	C-2758	11/06/00	None	Active
43.	Office of New Mexico State Engineer	Monitoring Well H-2B2	C-2763	11/06/00	None	Active
44.	Office of New Mexico State Engineer	Monitoring Well H-2C	C-2759	11/06/00	None	P&A
45.	Office of New Mexico State Engineer	Monitoring Well H-3B1	C-2764	11/06/00	None	Active
46.	Office of New Mexico State Engineer	Monitoring Well H-3B2	C-2760	11/06/00	None	Active
47.	Office of New Mexico State Engineer	Monitoring Well H-3B3	C-2761	11/06/00	None	P&A
48.	Office of New Mexico State Engineer	Monitoring Well H-3D	C-3207	11/06/00	None	Active
49.	Office of New Mexico State Engineer	Monitoring Well H-4A	C-2725	11/06/00	None	P&A
50.	Office of New Mexico State Engineer	Monitoring Well H-4B	C-2775	11/06/00	None	P&A
51.	Office of New Mexico State Engineer	Monitoring Well H-4C	C-2776	11/06/00	None	Active
52.	Office of New Mexico State Engineer	Monitoring Well H-5A	C-2746	11/06/00	None	P&A
53.	Office of New Mexico State Engineer	Monitoring Well H-5B	C-2745	11/06/00	None	Active
54.	Office of New Mexico State Engineer	Monitoring Well H-5C	C-2747	11/06/00	None	Active
55.	Office of New Mexico State Engineer	Monitoring Well H-6A	C-2751	11/06/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
56.	Office of New Mexico State Engineer	Monitoring Well H-6B	C-2749	11/06/00	None	P&A
57.	Office of New Mexico State Engineer	Monitoring Well H-6C	C-2750	11/06/00	None	Active
58.	Office of New Mexico State Engineer	Monitoring Well H-7A	C-2694	04/17/00	None	P&A
59.	Office of New Mexico State Engineer	Monitoring Well H-7B1	C-2770	11/06/00	None	Active
60.	Office of New Mexico State Engineer	Monitoring Well H-7B2	C-2771	11/06/00	None	P&A
61.	Office of New Mexico State Engineer	Monitoring Well H-8A	C-2780	11/06/00	None	Active
62.	Office of New Mexico State Engineer	Monitoring Well H-9A	C-2785	11/06/00	None	P&A
63.	Office of New Mexico State Engineer	Monitoring Well H-9B	C-2783	11/06/00	None	P&A
64.	Office of New Mexico State Engineer	Monitoring Well H-9C	C-2784	11/06/00	None	Active
65.	Office of New Mexico State Engineer	Monitoring Well H-10A	C-2779	11/06/00	None	Active
66.	Office of New Mexico State Engineer	Monitoring Well H-10B	C-2778	11/06/00	None	P&A
67.	Office of New Mexico State Engineer	Monitoring Well H-10C	C-2695	04/17/00	None	P&A
68.	Office of New Mexico State Engineer	Monitoring Well H-11B1	C-2767	11/06/00	None	P&A
69.	Office of New Mexico State Engineer	Monitoring Well H-11B2	C-2687	04/17/00	None	Active
70.	Office of New Mexico State Engineer	Monitoring Well H-11B3	C-2768	11/06/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
71.	Office of New Mexico State Engineer	Monitoring Well H-11B4	C-2769	11/06/00	None	P&A
72.	Office of New Mexico State Engineer	Monitoring Well H-12	C-2777	11/06/00	None	P&A
73.	Office of New Mexico State Engineer	Monitoring Well H-14	C-2766	11/06/00	None	Active
74.	Office of New Mexico State Engineer	Monitoring Well H-15	C-2685	04/17/00	None	Active
75.	Office of New Mexico State Engineer	Monitoring Well H-16	C-2753	11/06/00	None	Active
76.	Office of New Mexico State Engineer	Monitoring Well H-17	C-2773	11/06/00	None	Active
77.	Office of New Mexico State Engineer	Monitoring Well H-18	C-2683	04/17/00	None	Active
78.	Office of New Mexico State Engineer	Monitoring Well H-19B0	C-2420	01/25/95	None	Active
79.	Office of New Mexico State Engineer	Monitoring Well H-19B1	C-2420	01/25/95	None	Active
80.	Office of New Mexico State Engineer	Monitoring Well H-19B2	C-2421	01/25/95	None	Active
81.	Office of New Mexico State Engineer	Monitoring Well H-19B3	C-2422	01/25/95	None	Active
82.	Office of New Mexico State Engineer	Monitoring Well H-19B4	C-2423	01/25/95	None	Active
83.	Office of New Mexico State Engineer	Monitoring Well H-19B5	C-2424	01/25/95	None	Active
84.	Office of New Mexico State Engineer	Monitoring Well H-19B6	C-2425	01/25/95	None	Active
85.	Office of New Mexico State Engineer	Monitoring Well H-19B7	C-2426	01/25/95	None	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
86.	Office of New Mexico State Engineer	Monitoring Well P-14	C-2637	01/02/99	None	P&A
87.	Office of New Mexico State Engineer	Monitoring Well P-15	C-2686	04/17/00	None	P&A
88.	Office of New Mexico State Engineer	Monitoring Well P-17	C-2774	11/06/00	None	P&A
89.	Office of New Mexico State Engineer	Monitoring Well P-18	C-2756	11/06/00	None	P&A
90.	Office of New Mexico State Engineer	Monitoring Well WIPP-12	C-2639	01/12/99	None	P&A
91.	Office of New Mexico State Engineer	Monitoring Well WIPP-13	C-2748	11/06/00	None	Active
92.	Office of New Mexico State Engineer	Monitoring Well WIPP-18	C-2684	04/17/00	None	Active
93.	Office of New Mexico State Engineer	Monitoring Well WIPP-19	C-2755	11/06/00	None	Active
94.	Office of New Mexico State Engineer	Monitoring Well WIPP-21	C-2754	11/06/00	None	P&A
95.	Office of New Mexico State Engineer	Monitoring Well WIPP-25	C-2723	07/26/00	None	P&A
96.	Office of New Mexico State Engineer	Monitoring Well WIPP-26	C-2724	11/06/00	None	P&A
97.	Office of New Mexico State Engineer	Monitoring Well WIPP-27	C-2722	11/06/00	None	P&A
98.	Office of New Mexico State Engineer	Monitoring Well WIPP28	C-2636	01/12/99	None	P&A
99.	Office of New Mexico State Engineer	Monitoring Well WIPP-29	C-2743	11/06/00	None	P&A
100.	Office of New Mexico State Engineer	Monitoring Well WIPP-30	C-2727	08/04/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
101.	Office of New Mexico State Engineer	Monitoring Well H-6BR	C-3362	12/27/07	None	Active
102.	Office of New Mexico State Engineer	Monitoring Well H-15R	C-3361	12/27/07	None	Active
103.	Office of New Mexico State Engineer	Monitoring Well SNL-2	C-2948	02/14/03	None	Active
104.	Office of New Mexico State Engineer	Monitoring Well SNL-9	C-2950	02/14/03	None	Active
105.	Office of New Mexico State Engineer	Monitoring Well SNL-12	C-2954	02/25/03	None	Active
106.	Office of New Mexico State Engineer	Monitoring Well SNL-1	C-2953	02/25/03	None	Active
107.	Office of New Mexico State Engineer	Monitoring Well SNL-3	C-2949	02/14/03	None	Active
108.	Office of New Mexico State Engineer	Monitoring Well SNL-5	C-3002	10/01/03	None	Active
109.	Office of New Mexico State Engineer	Monitoring Well IMC-461	C-3015	11/25/03	None	Active
110.	Office of New Mexico State Engineer	Monitoring Well SNL-10	C-3221	07/26/05	None	Active
111.	Office of New Mexico State Engineer	Monitoring Well SNL-16	C-3220	07/26/05	None	Active
112.	Office of New Mexico State Engineer	Monitoring Well SNL-17	C-3222	07/26/05	None	Active
113.	US Environmental Protection Agency Region 6	Conditions of Approval for Disposal of PCB/TRU and PCB/TRU Mixed Waste at the US Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico	N/A	04/30/08	04/30/18	Active
114.	US Fish and Wildlife Service	Special Purpose – Relocate	MB155189-0	05/01/17	12/31/20	Active
115.	New Mexico Department of Game and Fish	Biotic Collection Permit	Authorization # 3293	02/02/17	12/31/19	Active
116.	Office of New Mexico State Engineer	Monitoring Well H-4bR	C-3404	01/13/09	None	Active
117.	Office of New Mexico State Engineer	Monitoring Well H-9bR	C-2783-POD2	07/14/10	None	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
118.	Office of New Mexico State Engineer	Monitoring Well C-2737	C-2737	09/27/00	None	Active
119.	Office of New Mexico State Engineer	Monitoring Well WIPP-11	C3112	12/27/07	None	Active
120.	Office of New Mexico State Engineer	Monitoring Well SNL-6	C-3151	02/10/05	None	Active
121.	Office of New Mexico State Engineer	Monitoring Well SNL-8	C-3150	02/10/05	None	Active
122.	Office of New Mexico State Engineer	Monitoring Well SNL-13	C-3139	12/17/04	None	Active
123.	Office of New Mexico State Engineer	Monitoring Well SNL-14	C-3140	12/17/04	None	Active
124.	Office of New Mexico State Engineer	Monitoring Well SNL-15	C-3152	02/10/05	None	Active
125.	Office of New Mexico State Engineer	Monitoring Well SNL-18	C-3233	10/06/05	None	Active
126.	Office of New Mexico State Engineer	Monitoring Well SNL-19	C-3234	10/06/05	None	Active
127.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-18 and SNL-19 well pads	NM115315	03/21/06	12/31/35	Active
128.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-11 and SNL-5	NM110735	10/17/03	10/17/33	Active
129.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-12 well pad	NM109176	04/15/03	04/15/33	Active
130.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-9 well pad	NM109175	04/15/03	04/15/33	Active
131.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-2 well pad	NM109174	04/15/03	04/15/33	Active
132.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-1 Access Road	NM109177	06/17/03	06/17/33	Active
133.	Department of the Interior, Bureau of Land Management	Right-of-Way for SPS 69KV Electric Distribution line	NM091163	12/16/94 (Southwestern Public Service)	12/15/24	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
134.	Office of New Mexico State Engineer	Monitor Well H-11b4R	C-2769-POD2	05/16/11	None	Active
135.	Office of New Mexico State Engineer	Monitor Well AEC-7R	C-3635	04/24/13	None	Active
136.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-1 Access Road	RW-28535	08/27/03	08/27/38	Active
137.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-3 Access Road	RW-28537	08/27/03	08/27/38	Active
138	Office of New Mexico State Engineer	Monitor Well H-12bR	C-3749 POD1	06/24/14	None	Active
139	Department of the Interior, Bureau of Land Management	Right-of-Way grant for H-12bR Access Road and well pad	NM-131916	06/19/14	12/31/43	Active
140	Office of New Mexico State Engineer	Monitor Well H-10cR	C-3851	07/09/15	None	Active

- 1
- 2 *Non DOE grantee is noted
- 3 P&A=Plugged and Abandoned

**APPENDIX B2
MAPS**

(This page intentionally blank)

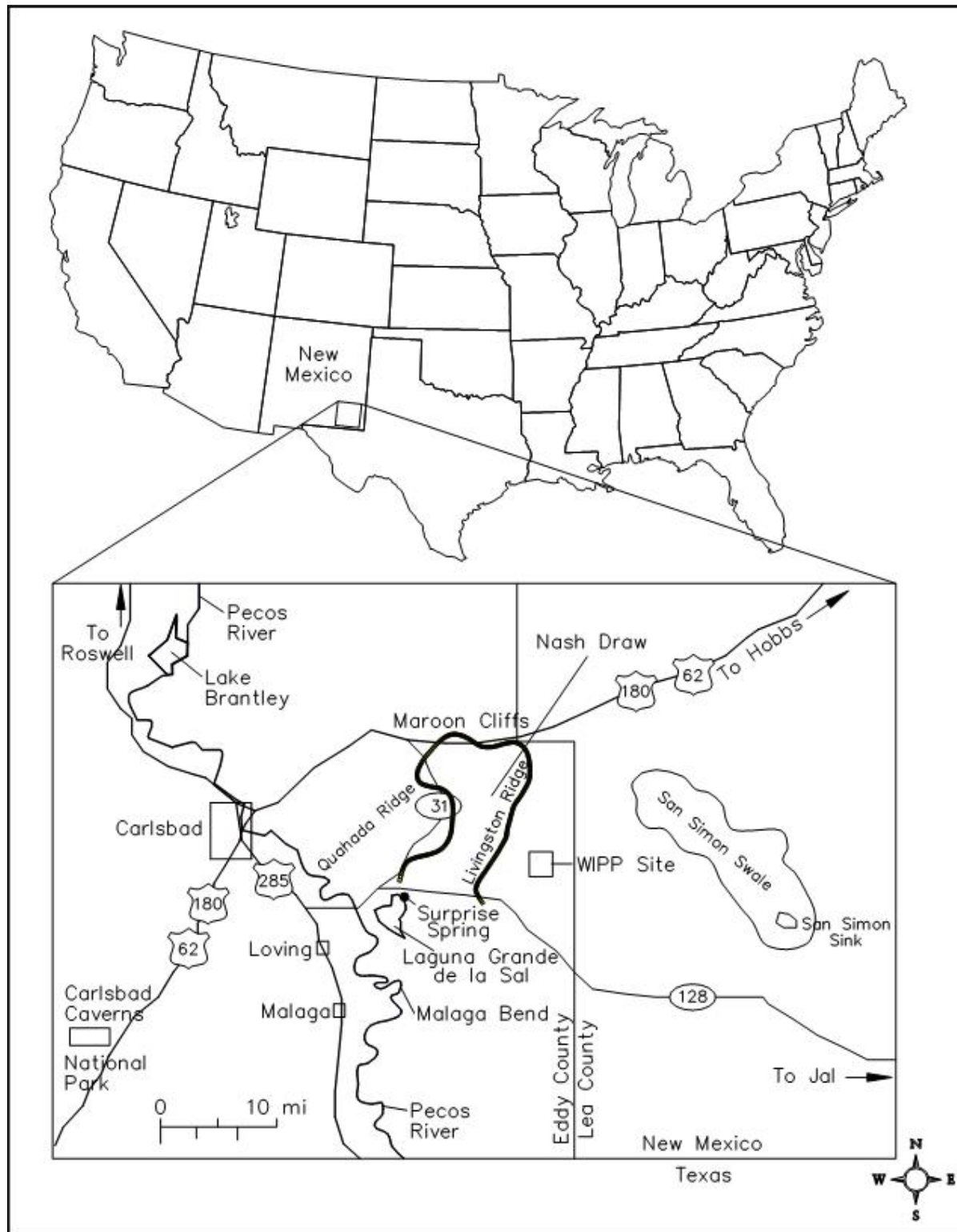


Figure B2-1
General Location of the WIPP Facility

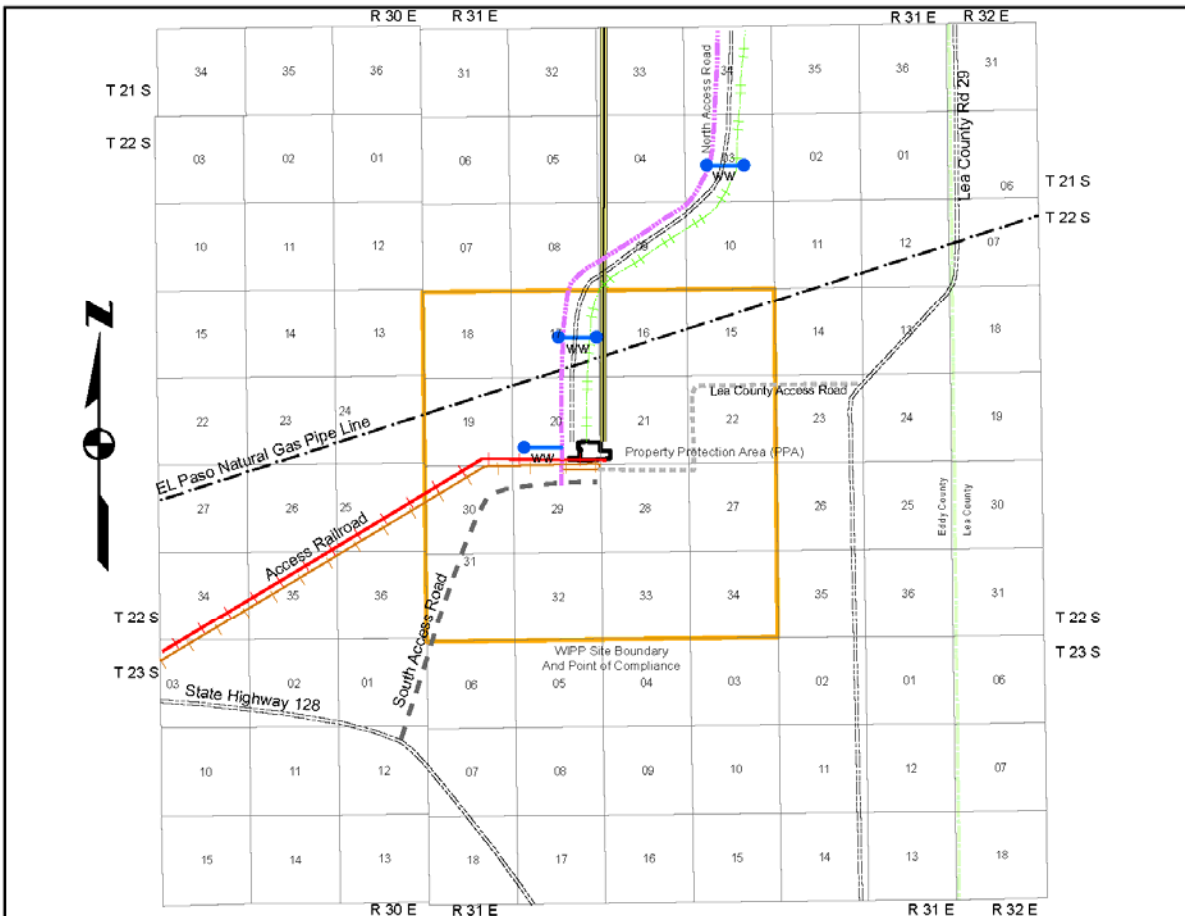













Figure B2-2
Planimetric Map-WIPP Facility Boundaries

Legend

-  WIPP Site Boundary 10,240 Acres.
-  U.S. DOE Right of Way Number NM-53809. For Waterline, 50 Feet Wide. The DOE had Agreed with the City of Carlsbad to Allow the Individuals to Tap this Line Located within the North Access Road Right of Way.
-  Tap Lines Connected to the Main WIPP Waterline.
-  Stock Water Tanks.
-  Southwestern Public Service Company Right of Way Number NM-43203 for Power 60 Feet Wide.
-  General Telephone of the Southwest Right of Way for Telephone Line, 30 Feet Wide, Located within the North Access Road Right of Way.
-  General Telephone of the Southwest Right of Way Number NM-60174 for Telephone Line, 30 Feet Wide, Located within the Railroad Right of Way.
-  U.S. DOE Right of Way Number NM-55675 for North Access Road, 170 Feet Wide.
-  U.S. DOE Right of Way for Access Roads Includes Right of Way Number NM-123703 for the South Access Road, 140 Feet Wide.
-  El Paso Natural Gas Company Right of Way for Gas Pipeline, 30 Feet Wide in Section 16, 50 Feet Wide Elsewhere.
-  U.S. DOE Right of Way Number NM-55699 for Access Railroad, 150 Feet Wide.

NOTES

1. The Property Protection Area is a fenced area of approximately 44 acres. It contains all surface facilities with the exception of salt storage piles, parking lot, landfill and waste water stabilization lagoons.
2. WIPP Site Boundary (WSB) provides a one mile buffer area around the area available for underground development

Figure B2-2a
Legend to Figure B2-2

**Replace this page with the Topographic Map
from the earlier version of the draft Permit**

**Figure B2-3
Topographic Map**

APPENDIX B3 FACILITIES

(This page intentionally blank)

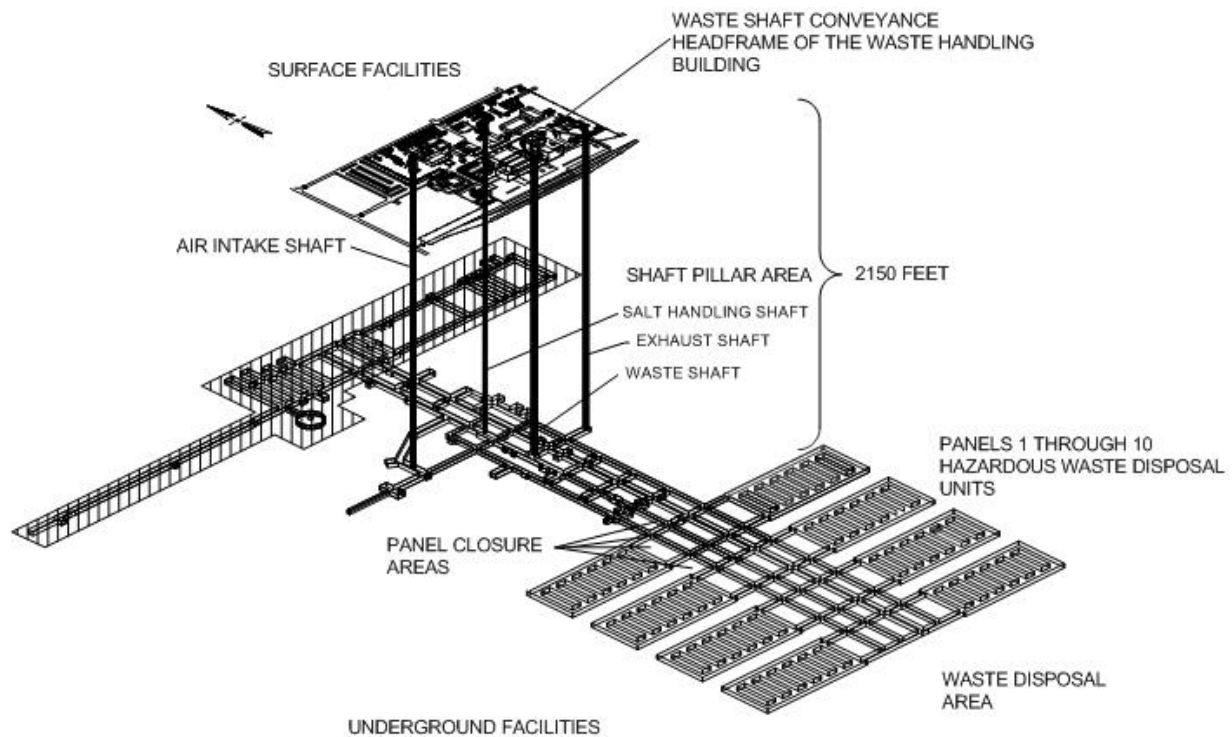


Figure B3-1
Spatial View of the WIPP Facility

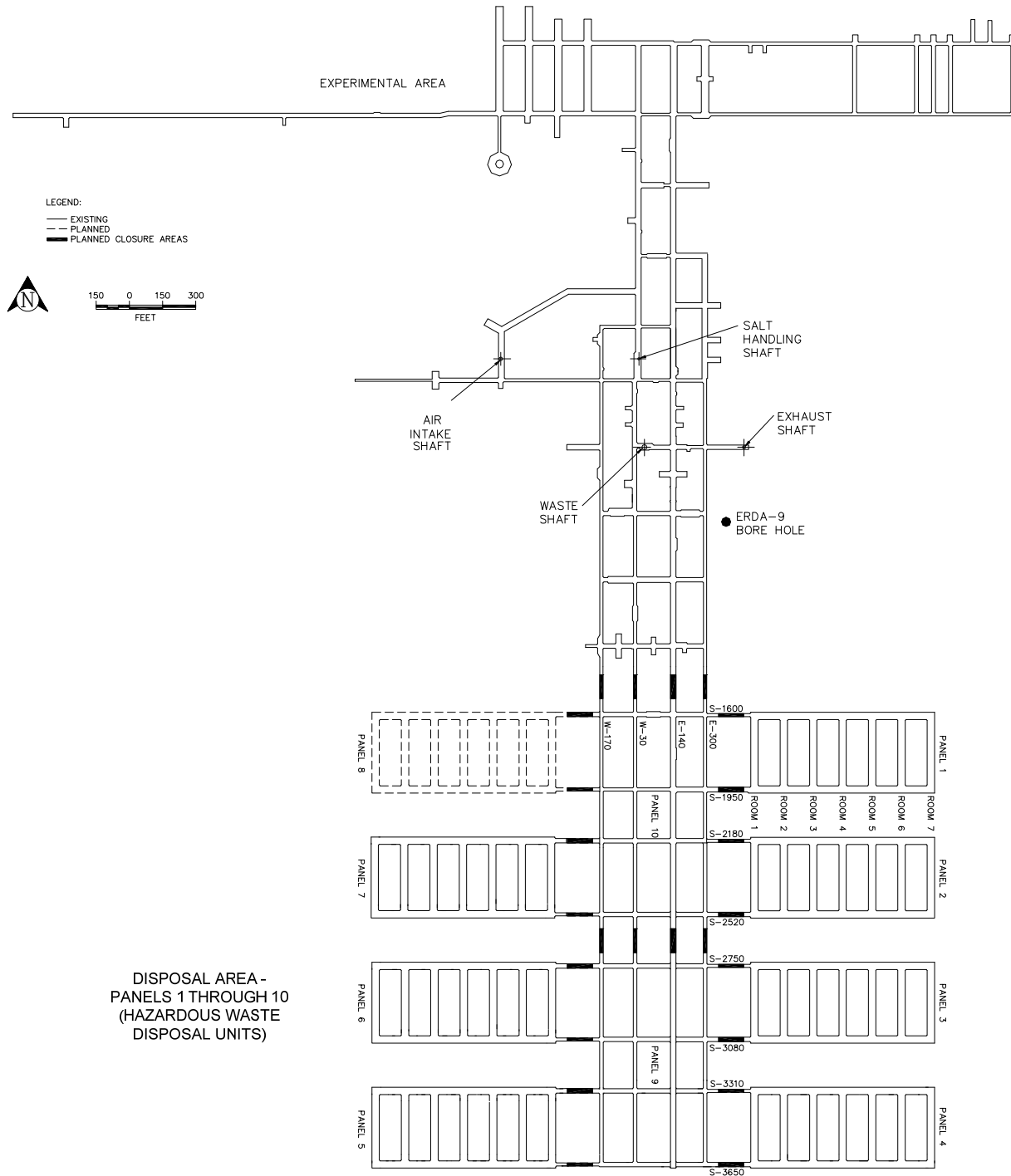


Figure B3-2
Repository Horizon

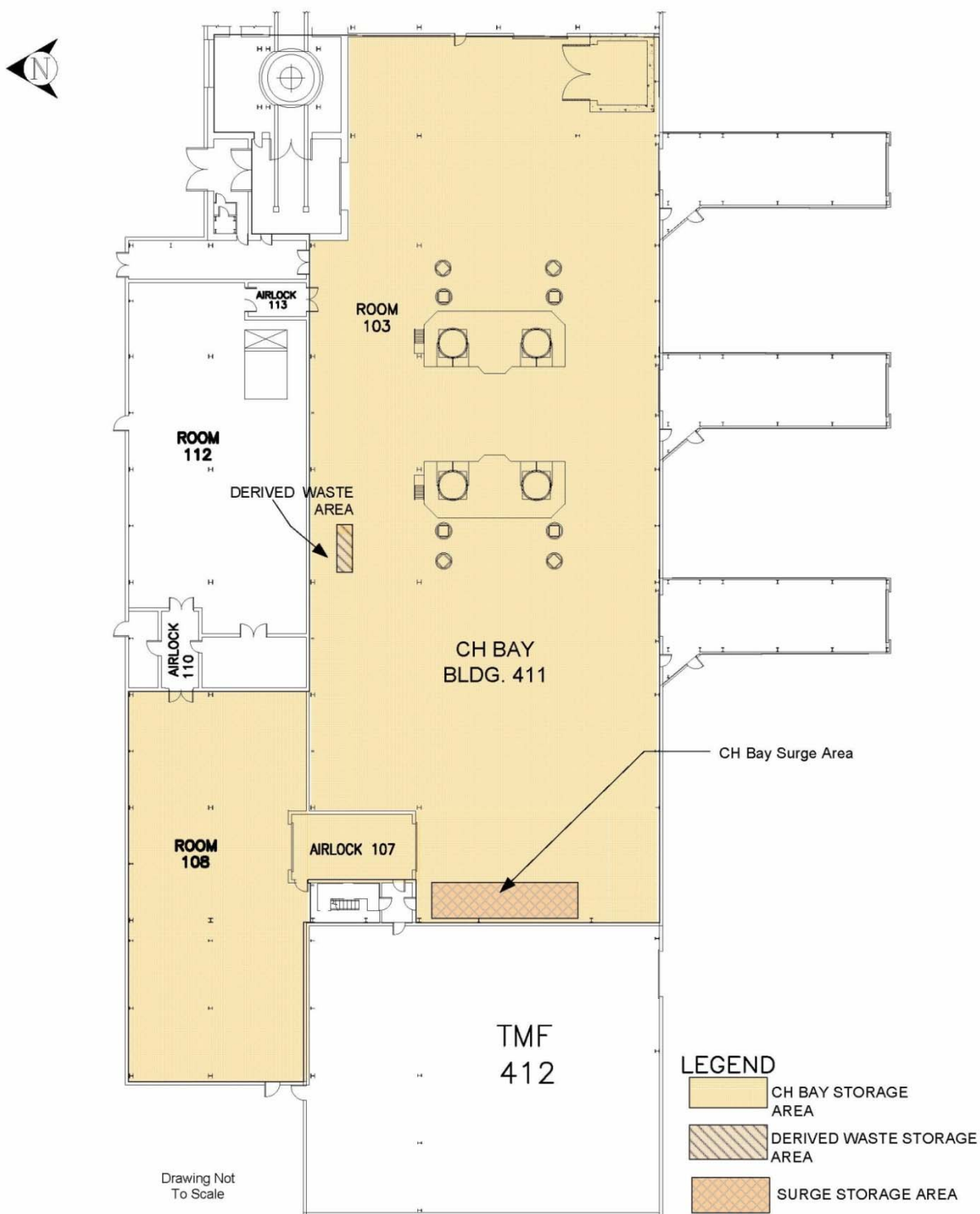


Figure B3-3
Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Areas

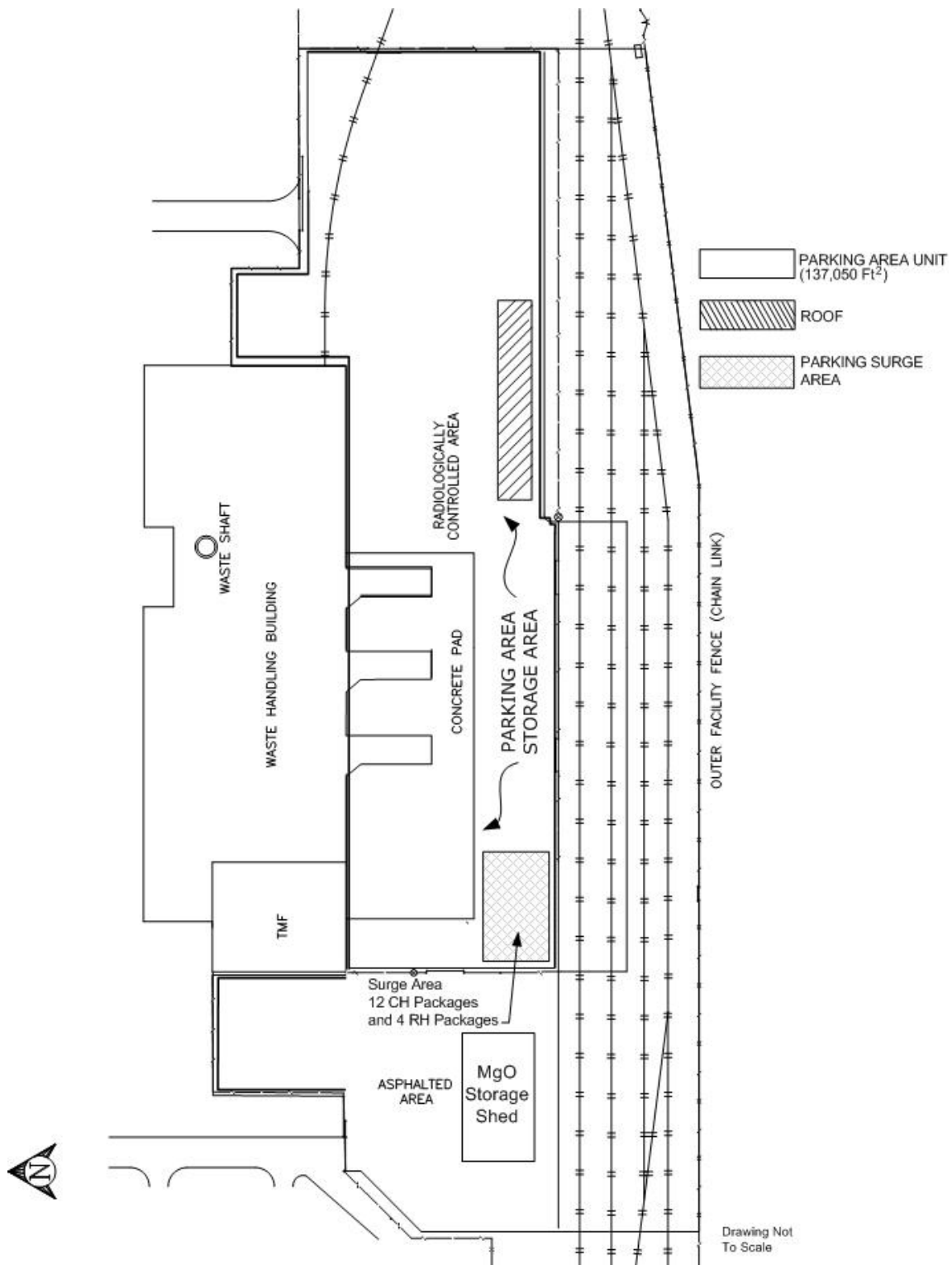


Figure B3-4
Parking Area-Container Storage and Surge Areas

**APPENDIX B4
PHOTOGRAPHS**

(This page intentionally blank)



Figure B4-1
Aerial Photograph of the Waste Isolation Pilot Plant



Figure B4-2
Underground - Panel One - Waste Disposal Room

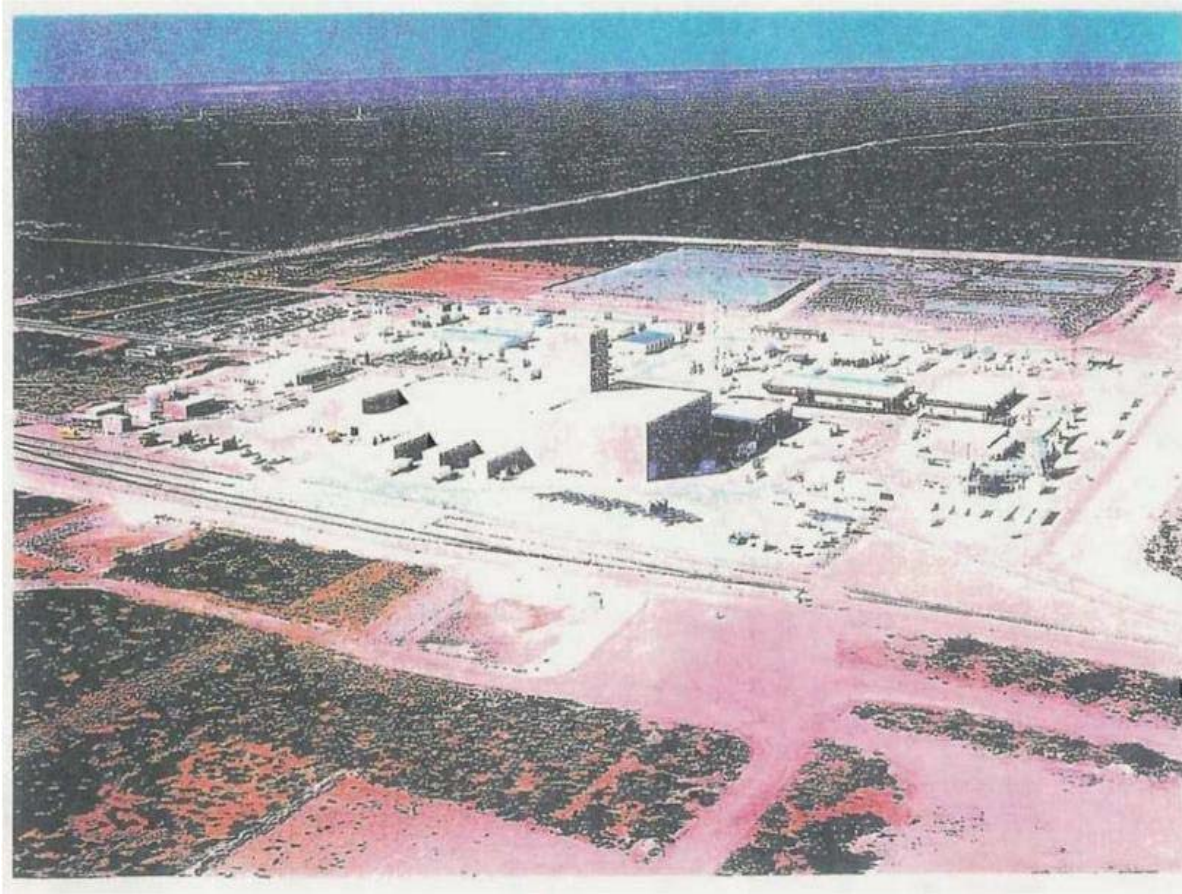


Figure B4-3
Aerial Photograph of the Waste Handling Building



Figure B4-4
TRUDOCKs in CH Bay of the Waste Handling Building



Figure B4-5
NE Corner of CH Bay of the Waste Handling Building



Figure B4-6
Westward View of CH Bay of the Waste Handling Building



Figure B4-7
Waste Shaft Conveyance - Loading Facility Pallet with CH Waste, Waste Handling Building



Figure B4-8
RH Bay (Photo Taken July 2000)



Figure B4-9
Cask Unloading Room and Bridge Crane



Figure B4-10
Hot Cell



Figure B4-11
Transfer Cell



Figure B4-12
Facility Cask Loading Room and Facility Cask Rotating Device

Clean version

ATTACHMENT B
HAZARDOUS WASTE PERMIT APPLICATION PART A

(This page intentionally blank)

ATTACHMENT B


HAZARDOUS WASTE PERMIT APPLICATION PART A

TABLE OF CONTENTS

PART A - HAZARDOUS WASTE PERMIT APPLICATION	1
RCRA PART A APPLICATION CERTIFICATION.....	14
APPENDIX B1 OTHER ENVIRONMENTAL PERMITS	15
APPENDIX B2 MAPS	27
Figure B2-1 General Location of the WIPP Facility.....	29
Figure B2-2 Planimetric Map-WIPP Facility Boundaries.....	30
Figure B2-2a Legend to Figure B2-2.....	31
Figure B2-3 Topographic Map	32
APPENDIX B3 FACILITIES	33
Figure B3-1 Spatial View of the WIPP Facility	35
Figure B3-2 Repository Horizon	36
Figure B3-3 Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Areas.....	37
Figure B3-4 Parking Area-Container Storage and Surge Areas	38
APPENDIX B4 PHOTOGRAPHS	39
Figure B4-1 Aerial Photograph of the Waste Isolation Pilot Plant.....	41
Figure B4-2 Underground - Panel One - Waste Disposal Room.....	42
Figure B4-3 Aerial Photograph of the Waste Handling Building	43
Figure B4-4 TRUDOCKs in CH Bay of the Waste Handling Building.....	44
Figure B4-5 NE Corner of CH Bay of the Waste Handling Building	45
Figure B4-6 Westward View of CH Bay of the Waste Handling Building	46
Figure B4-7 Waste Shaft Conveyance - Loading Facility Pallet with CH Waste, Waste Handling Building.....	47
Figure B4-8 RH Bay (Photo Taken July 2000)	48
Figure B4-9 Cask Unloading Room and Bridge Crane	49
Figure B4-10 Hot Cell.....	50
Figure B4-11 Transfer Cell.....	51
Figure B4-12 Facility Cask Loading Room and Facility Cask Rotating Device	52

(This page intentionally blank)

OMB# 2050-0024; Expires 05/31/2020

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 an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of > 1,000 kg of 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 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 30 miles east of Carlsbad on Jal Highway	
City, Town, or Village Carlsbad	County Eddy
State NM	Country USA Zip Code 88221

5. Site Mailing Address

☐ Same as Location 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.

EPA ID Number

N	M	4	8	9	0	1	3	9	0	8	8
---	---	---	---	---	---	---	---	---	---	---	---

OMB# 2050-0024; Expires 05/31/2020

8. Site Contact Information

☐ Same as Location Address

First Name	Todd	MI	A	Last Name	Shrader
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	Todd.Shrader@cbfo.doe.gov				
Phone	(575) 234-7300	Ext		Fax	(575) 234-7027

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)	05/18/1981
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	Todd.Shrader@cbfo.doe.gov		
Phone	(575) 234-7300	Ext	
Fax	(575) 234-7027		
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)	05/18/1981
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	Todd.Shrader@cbfo.doe.gov		
Phone	(575) 234-7300	Ext	
Fax	(575) 234-7027		
Comments	See Item 18, Comments, for additional operator.		

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

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 (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<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.
If "Yes" above, indicate other generator activities in 2 and 3, as applicable.		
<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.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	3. Mixed Waste (hazardous and radioactive) Generator	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Treater, Storer or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for these activities.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	5. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. 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	7. 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.

EPA ID Number

N M 4 8 9 0 1 3 9 0 8 8

OMB# 2050-0024; Expires 05/31/2020

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. Other (specify) _____
<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

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories—If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<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 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 VSQGs 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	A. Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker

<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?
--	--

EPA ID Number

N	M	4	8	9	0	1	3	9	0	8	8
---	---	---	---	---	---	---	---	---	---	---	---

OMB# 2050-0024; Expires 05/31/2020

18. Comments (include item number for each comment)

Section 9.B (continued):		
Full Name: Nuclear Waste Partnership LLC		
Date Became Operator (mm/dd/yyyy): 10/01/2012		
Operator Type: Private		
Street Address: P.O. Box 2078		
City, Town, or Village: Carlsbad		
State: NM	Country: USA	Zip Code: 88221
Email: Bruce.Covert@wipp.ws		
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	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Todd A. Shrader	Title Manager, Carlsbad Field Office (CBFO)
Email Todd.Shrader@cbfo.doe.gov	
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Bruce C. Covert	Title Project Manager, Nuclear Waste Partnership LLC
Email Bruce.Covert@wipp.ws	

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

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)

05/18/1981

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 which entails receiving, unloading, and transferring radioactive mixed waste from the surface of the site to the underground hazardous waste management units. Waste is emplaced in an underground geologic repository horizon located in a deep-bedded salt formation approximately 2,150 feet beneath the surface.

EPA ID Number **N M 4 8 9 0 1 3 9 0 8 8**

OMB# 2050-0024; Expires 05/31/2020

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		
1	X	0	4		18000.00	C	002	Panels 1 and 2
2	X	0	4		18750.00	C	001	Panel 3
3	X	0	4		19106.00	C	001	Panel 4
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.D(1))			
	1	D	0	0	4	903	M	X	0	4	S	0	1	S	0	1			
	2	D	0	0	5	484	M	X	0	4	S	0	1	S	0	1			
	3	D	0	0	6	1819	M	X	0	4	S	0	1	S	0	1			
	4	D	0	0	7	1248	M	X	0	4	S	0	1	S	0	1			
	5	D	0	0	8	3246	M	X	0	4	S	0	1	S	0	1			
	6	D	0	0	9	1727	M	X	0	4	S	0	1	S	0	1			
	7	D	0	1	0	186	M	X	0	4	S	0	1	S	0	1			
	8	D	0	1	1	1090	M	X	0	4	S	0	1	S	0	1			
	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.

- 1 EPA ID Number: NM4890139088
- 2 Hazardous Waste Permit Part A Form
- 3 6. Process Codes and Design Capacities (continued)

Line Numbers		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
	5	X	0	4	19284.00	C	001	Panel 6
	6	X	0	4	19400.00	C	002	Panels 7 and 8
	7	S	0	1	194.1	C	001	Waste Handling Building Unit
	8	S	0	1	242.0	C	001	Parking Area Unit

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities

The Waste Isolation Pilot Plant (WIPP) geologic repository is defined as a “miscellaneous unit” under 40 CFR §260.10. “Miscellaneous unit” means a hazardous waste management unit where hazardous waste is treated, stored, or disposed of and that is not a container, tank, surface impoundment, waste pile, land treatment unit, landfill, incinerator, containment building, boiler, industrial furnace, or underground injection well with appropriate technical standards under 40 CFR Part 146, corrective action management unit, or unit eligible for research, development, and demonstration permit under 40 CFR §270.65. The WIPP is a geologic repository designed for the disposal of defense-generated transuranic (TRU) waste. Some of the TRU wastes disposed of at the WIPP contain hazardous wastes as co-contaminants. More than half the waste to be disposed of at the WIPP also meets the definition of debris waste. The debris categories include manufactured goods, biological materials, and naturally occurring geological materials. Approximately 70 percent of waste anticipated for disposal in the WIPP repository is categorized as debris waste. The geologic repository has been divided into ten discrete hazardous waste management units (HWMU) which are being permitted under 40 CFR Part 264, Subpart X.

For purposes of this application, all TRU waste is managed as though it were mixed. During the Disposal Phase of the facility, which is expected to last 25 years, the emplaced TRU mixed waste volume will not exceed the design capacity specified in Item 6, *Process Codes and Design Capacities*. This volume is calculated based on the volumes of the outermost disposal containers and cannot exceed 151,135 m³ for Panels 1 through 8. The Land Withdrawal Act (LWA) TRU waste volume of record is tracked and reported, separately from the Permit, by the DOE for the purposes of compliance with the WIPP LWA total capacity limit for TRU waste of 6.2 million ft³ (175,564 m³).

The process design capacities for each of the eight underground HWMUs in the geologic repository (i.e., miscellaneous unit) are shown in Item 6, *Process Codes and Design Capacities*. In addition, two HWMUs have been designated as container storage units (S01) in Item 6, *Process Codes and Design Capacities*. One is inside the Waste Handling Building (WHB) and consists of the contact-handled (CH) bay, waste shaft conveyance loading room, waste shaft conveyance entry room, RH bay, cask unloading room, hot cell, transfer cell, and facility cask loading room. This HWMU will be used for waste receipt, handling, and storage (including storage of derived waste) prior to emplacement in the underground geologic repository. No treatment or disposal will occur in this S01 HWMU. The capacity of this S01 unit for storage is 194.1 m³, based on 36 ten-drum overpacks on 18 facility pallets, four CH Packages at the TRUDOCKs, one standard waste box of derived waste, two loaded casks and one 55-gallon drum of derived waste in the RH Bay, one loaded cask in the Cask Unloading Room, 13 55-gallon drums in the Hot Cell, one canister in the Transfer Cell and one canister in the Facility Cask Unloading Room. The second S01 HWMU is the parking area outside the WHB where the Contact- and Remote-Handled Package trailers and the road cask trailers will be parked awaiting waste handling operations. The capacity of this unit is 50 Contact-Handled Packages and twelve Remote-Handled Packages with a combined TRU mixed waste volume of 242 m³.

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities (continued)

The HWMUs are shown in Figures B3-2, B3-3, and B3-4.

During the ten-year period of the permit, a CH TRU mixed waste volume of up to 148,500 m³ could be emplaced in Panels 1 to 8 and an RH TRU mixed waste volume up to 2,635 m³ could be emplaced in Panels 4 to 8 for a total of 151,135 m³, as shown in Item 6, *Process Codes and Design Capacities*. Panels 9 and 10 will be constructed under the initial term of this permit. These latter areas will not receive waste for disposal under this permit.

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

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

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										(2) Process Description (if code is not entered in 7.D1))
								(1) Process Codes										
1	1	D	0	2	1	26	M	X	0	4	S	0	1	S	0	1		
1	2	D	0	2	2	1098	M	X	0	4	S	0	1	S	0	1		
1	3	D	0	2	6	609	M	X	0	4	S	0	1	S	0	1		
1	4	D	0	2	7	26	M	X	0	4	S	0	1	S	0	1		
1	5	D	0	2	8	449	M	X	0	4	S	0	1	S	0	1		
1	6	D	0	2	9	478	M	X	0	4	S	0	1	S	0	1		
1	7	D	0	3	0	26	M	X	0	4	S	0	1	S	0	1		
1	8	D	0	3	2	26	M	X	0	4	S	0	1	S	0	1		
1	9	D	0	3	3	344	M	X	0	4	S	0	1	S	0	1		
2	0	D	0	3	4	26	M	X	0	4	S	0	1	S	0	1		
2	1	D	0	3	5	139	M	X	0	4	S	0	1	S	0	1		
2	2	D	0	3	6	26	M	X	0	4	S	0	1	S	0	1		
2	3	D	0	3	7	26	M	X	0	4	S	0	1	S	0	1		
2	4	D	0	3	8	26	M	X	0	4	S	0	1	S	0	1		
2	5	D	0	3	9	26	M	X	0	4	S	0	1	S	0	1		
2	6	D	0	4	0	140	M	X	0	4	S	0	1	S	0	1		
2	7	D	0	4	3	26	M	X	0	4	S	0	1	S	0	1		
2	8	F	0	0	1	1891	M	X	0	4	S	0	1	S	0	1		
2	9	F	0	0	2	1860	M	X	0	4	S	0	1	S	0	1		
3	0	F	0	0	3	1593	M	X	0	4	S	0	1	S	0	1		
3	1	F	0	0	4	26	M	X	0	4	S	0	1	S	0	1		
3	2	F	0	0	5	1829	M	X	0	4	S	0	1	S	0	1		
3	3	F	0	0	6	915	M	X	0	4	S	0	1	S	0	1		
3	4	F	0	0	7	915	M	X	0	4	S	0	1	S	0	1		
3	5	F	0	0	9	915	M	X	0	4	S	0	1	S	0	1		
3	6	P	0	1	5	945	M	X	0	4	S	0	1	S	0	1		
3	7	P	0	3	0	344	M	X	0	4	S	0	1	S	0	1		
3	8	P	0	9	8	344	M	X	0	4	S	0	1	S	0	1		
3	9	P	0	9	9	344	M	X	0	4	S	0	1	S	0	1		
4	0	P	1	0	6	344	M	X	0	4	S	0	1	S	0	1		
4	1	P	1	2	0	344	M	X	0	4	S	0	1	S	0	1		
4	2	U	0	0	2	344	M	X	0	4	S	0	1	S	0	1		
4	3	U	0	0	3	344	M	X	0	4	S	0	1	S	0	1		
4	4	U	0	1	9	344	M	X	0	4	S	0	1	S	0	1		
4	5	U	0	3	7	344	M	X	0	4	S	0	1	S	0	1		

EPA ID Number: NM4890139088

Hazardous Waste Permit Part A Form

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

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										(2) Process Description (if code is not entered in 7.D1))
								(1) Process Codes										
4	6	U	0	4	3	344	M	X	0	4	S	0	1	S	0	1		
4	7	U	0	4	4	344	M	X	0	4	S	0	1	S	0	1		
4	8	U	0	5	2	344	M	X	0	4	S	0	1	S	0	1		
4	9	U	0	7	0	344	M	X	0	4	S	0	1	S	0	1		
5	0	U	0	7	2	344	M	X	0	4	S	0	1	S	0	1		
5	1	U	0	7	8	344	M	X	0	4	S	0	1	S	0	1		
5	2	U	0	7	9	344	M	X	0	4	S	0	1	S	0	1		
5	3	U	1	0	3	344	M	X	0	4	S	0	1	S	0	1		
5	4	U	1	0	5	344	M	X	0	4	S	0	1	S	0	1		
5	5	U	1	0	8	344	M	X	0	4	S	0	1	S	0	1		
5	6	U	1	2	2	344	M	X	0	4	S	0	1	S	0	1		
5	7	U	1	3	3	344	M	X	0	4	S	0	1	S	0	1		
5	8	U	1	3	4	344	M	X	0	4	S	0	1	S	0	1		
5	9	U	1	5	1	344	M	X	0	4	S	0	1	S	0	1		
6	0	U	1	5	4	344	M	X	0	4	S	0	1	S	0	1		
6	1	U	1	5	9	344	M	X	0	4	S	0	1	S	0	1		
6	2	U	1	9	6	344	M	X	0	4	S	0	1	S	0	1		
6	3	U	2	0	9	344	M	X	0	4	S	0	1	S	0	1		
6	4	U	2	1	0	344	M	X	0	4	S	0	1	S	0	1		
6	5	U	2	2	0	344	M	X	0	4	S	0	1	S	0	1		
6	6	U	2	2	6	344	M	X	0	4	S	0	1	S	0	1		
6	7	U	2	2	8	344	M	X	0	4	S	0	1	S	0	1		
6	8	U	2	3	9	344	M	X	0	4	S	0	1	S	0	1		

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 Nuclear Waste Partnership LLC, the Management and Operating Contractor (MOC), has signed this application for the permitted facility as “co-operator.”

The DOE has determined that dual signatures best reflect the actual apportionment of Resource Conservation and Recovery Act (RCRA) responsibilities as follows:

The DOE’s RCRA responsibilities are for policy, programmatic directives, funding and scheduling decisions, Waste Isolation Pilot Plant (WIPP) requirements of DOE generator sites, auditing, and oversight of all other parties engaged in work at the WIPP, as well as general oversight.

The MOC’s RCRA responsibilities are for certain day-to-day operations (in accordance with general directions given by the DOE and in the Management and Operating Contract as part of its general oversight responsibility), including, but not limited to, the following: certain waste handling, monitoring, record keeping, certain data collection, reporting, technical advice, and contingency planning.

For purposes of the certification required by Title 20 of the New Mexico Administrative Code, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, §270.11(d), the DOE’s and the MOC’s representatives certify, under penalty of law that this document and all attachments were prepared under their direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on their inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of their knowledge and belief, true, accurate, and complete for their respective areas of responsibility. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner and Operator Signature:

Title: Manager, Carlsbad Field Office

for: U.S. Department of Energy

Date: _____

Co-Operator Signature:

Title: Project Manager

for: Nuclear Waste Partnership LLC

Date: _____

APPENDIX B1
OTHER ENVIRONMENTAL PERMITS

1
2
3

1
2

(This page intentionally blank)

1

Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of June 2017

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
1.	Department of the Interior, Bureau of Land Management	Right-of-Way for Water Pipeline	NM053809	08/17/83 (Transferred 05/15/06 to City of Carlsbad)	In Perpetuity	Active
2.	Department of the Interior, Bureau of Land Management	Right-of-Way for the North Access Road	NM055676	08/23/83	In Perpetuity	Active
3.	Department of the Interior, Bureau of Land Management	Right-of-Way for Railroad	NM055699	09/27/83	In Perpetuity	Active
4.	Department of the Interior, Bureau of Land Management	Right-of-Way for Dosimetry and Aerosol Sampling Sites	NM063136	07/03/86	12/31/40	Active
5.	Department of the Interior, Bureau of Land Management	Right-of-Way for Seven Subsidence Monuments	NM065801	11/07/86	None	Active
6.	Department of the Interior, Bureau of Land Management	Right-of-Way for Aerosol Sampling Site	NM077921	08/18/89	08/18/19	Active
7.	Department of the Interior, Bureau of Land Management	Right-of-Way for 2 Survey Monuments	NM082245	12/13/89	12/13/19	Active
8.	Department of the Interior, Bureau of Land Management	Right-of-Way for telephone cable	NM046092	09/04/81 (Valor Telecom of NM LLC)	09/04/11	Active Renewal In Process
9.	Department of the Interior, Bureau of Land Management	Right-of-Way for SPS 115 KV Powerline	NM043203	10/19/81 (Southwestern Public Service)	12/31/40	Active
10.	Department of the Interior, Bureau of Land Management	Right-of-Way for South Access Road	NM123703	01/27/10	12/31/39	Active
11.	Department of the Interior, Bureau of Land Management	Right-of-Way for Duval telephone line	NM060174	03/08/85 (Valor Telecom of NM LLC)	03/08/35	Active
12.	Department of the Interior, Bureau of Land Management	Right-of-Way for groundwater monitor wells/pads	NM108365	08/30/02	08/30/32	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
13.	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Well C-2664 (Cabin Baby)	NM107944	04/23/02	04/23/32	Active
14.	Department of the Interior, Bureau of Land Management	Right-of-Way for Wells C-2725 (H-4A), C-2775 (H-4B), & C-2776 (H-4C)	NM-6-5 Cooperative Agreement	04/27/78	None	Active
15.	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Wells C-2723 (WIPP-25), C-2724 (WIPP-26), C-2722 (WIPP-27), C-2636 (WIPP-28), C-2743 (WIPP-29), & C-2727 (WIPP-30)	NM-6-5 Cooperative Agreement	07/14/78	None	Active
16.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for accessing state trust lands in Eddy & Lea Counties	RW-25430	09/28/04	09/27/16	Inactive
17.	Department of Interior, Bureau of Land Management	Right of Way for Valor Telecom	NM113339	08/09/05 (Valor Telecom Inc)	12/31/34	Active
18.	Department of Interior, Bureau of Land Management	Right of Way for South Access Road Fence	NM094304	03/15/95	None	Active
19.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way for High Volume Air Sampler	RW-22789	10/03/85	10/03/20	Active
20.	New Mexico Environment Department Groundwater Quality Bureau	Discharge Permit	DP-831	07/29/14	07/29/19	Active
21.	New Mexico Environment Department Air Quality Bureau	Operating Permit for two backup diesel generators	310-M-2	12/07/93	None	Active
22.	New Mexico Environment Department-Petroleum Storage Tank Bureau	Storage Tank Registration Certificate	Registration Number 1767 Facility Number 31539	07/01/16	06/30/17	Active
23.	Office of New Mexico State Engineer	Monitoring Well Exhaust Shaft Exploratory Borehole	C-2801	02/23/01	None	Inactive

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
24.	Office of New Mexico State Engineer	Monitoring Well Exhaust Shaft Exploratory Borehole	C-2802	02/23/01	None	Inactive
25.	Office of New Mexico State Engineer	Monitoring Well Exhaust Shaft Exploratory Borehole	C-2803	02/23/01	None	Inactive
26.	Office of New Mexico State Engineer	Monitoring Well	C-2811	03/02/02	None	Active
27.	Office of New Mexico State Engineer	Appropriation: WQSP-1 Well	C-2413	10/21/96	None	Active
28.	Office of New Mexico State Engineer	Appropriation: WQSP-2 Well	C-2414	10/21/96	None	Active
29.	Office of New Mexico State Engineer	Appropriation: WQSP-3 Well	C-2415	10/21/96	None	Active
30.	Office of New Mexico State Engineer	Appropriation: WQSP-4 Well	C-2416	10/21/96	None	Active
31.	Office of New Mexico State Engineer	Appropriation: WQSP-5 Well	C-2417	10/21/96	None	Active
32.	Office of New Mexico State Engineer	Appropriation: WQSP-6 Well	C-2418	10/21/96	None	Active
33.	Office of New Mexico State Engineer	Appropriation: WQSP-6a Well	C-2419	10/21/96	None	Active
34.	Office of New Mexico State Engineer	Monitoring Well AEC-7	C-2742	11/06/00	None	P&A
35.	Office of New Mexico State Engineer	Monitoring Well AEC-8	C-2744	11/06/00	None	P&A
36.	Office of New Mexico State Engineer	Monitoring Well Cabin Baby	C-2664	07/30/99	None	Active
37.	Office of New Mexico State Engineer	Monitoring Well DOE-1	C-2757	11/06/00	None	P&A
38.	Office of New Mexico State Engineer	Monitoring Well DOE-2	C-2682	04/17/00	None	Active
39.	Office of New Mexico State Engineer	Monitoring Well ERDA-9	C-2752	11/06/00	None	Active
40.	Office of New Mexico State Engineer	Monitoring Well H-1	C-2765	11/06/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
41.	Office of New Mexico State Engineer	Monitoring Well H-2A	C-2762	11/06/00	None	P&A
42.	Office of New Mexico State Engineer	Monitoring Well H-2B1	C-2758	11/06/00	None	Active
43.	Office of New Mexico State Engineer	Monitoring Well H-2B2	C-2763	11/06/00	None	Active
44.	Office of New Mexico State Engineer	Monitoring Well H-2C	C-2759	11/06/00	None	P&A
45.	Office of New Mexico State Engineer	Monitoring Well H-3B1	C-2764	11/06/00	None	Active
46.	Office of New Mexico State Engineer	Monitoring Well H-3B2	C-2760	11/06/00	None	Active
47.	Office of New Mexico State Engineer	Monitoring Well H-3B3	C-2761	11/06/00	None	P&A
48.	Office of New Mexico State Engineer	Monitoring Well H-3D	C-3207	11/06/00	None	Active
49.	Office of New Mexico State Engineer	Monitoring Well H-4A	C-2725	11/06/00	None	P&A
50.	Office of New Mexico State Engineer	Monitoring Well H-4B	C-2775	11/06/00	None	P&A
51.	Office of New Mexico State Engineer	Monitoring Well H-4C	C-2776	11/06/00	None	Active
52.	Office of New Mexico State Engineer	Monitoring Well H-5A	C-2746	11/06/00	None	P&A
53.	Office of New Mexico State Engineer	Monitoring Well H-5B	C-2745	11/06/00	None	Active
54.	Office of New Mexico State Engineer	Monitoring Well H-5C	C-2747	11/06/00	None	Active
55.	Office of New Mexico State Engineer	Monitoring Well H-6A	C-2751	11/06/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
56.	Office of New Mexico State Engineer	Monitoring Well H-6B	C-2749	11/06/00	None	P&A
57.	Office of New Mexico State Engineer	Monitoring Well H-6C	C-2750	11/06/00	None	Active
58.	Office of New Mexico State Engineer	Monitoring Well H-7A	C-2694	04/17/00	None	P&A
59.	Office of New Mexico State Engineer	Monitoring Well H-7B1	C-2770	11/06/00	None	Active
60.	Office of New Mexico State Engineer	Monitoring Well H-7B2	C-2771	11/06/00	None	P&A
61.	Office of New Mexico State Engineer	Monitoring Well H-8A	C-2780	11/06/00	None	Active
62.	Office of New Mexico State Engineer	Monitoring Well H-9A	C-2785	11/06/00	None	P&A
63.	Office of New Mexico State Engineer	Monitoring Well H-9B	C-2783	11/06/00	None	P&A
64.	Office of New Mexico State Engineer	Monitoring Well H-9C	C-2784	11/06/00	None	Active
65.	Office of New Mexico State Engineer	Monitoring Well H-10A	C-2779	11/06/00	None	Active
66.	Office of New Mexico State Engineer	Monitoring Well H-10B	C-2778	11/06/00	None	P&A
67.	Office of New Mexico State Engineer	Monitoring Well H-10C	C-2695	04/17/00	None	P&A
68.	Office of New Mexico State Engineer	Monitoring Well H-11B1	C-2767	11/06/00	None	P&A
69.	Office of New Mexico State Engineer	Monitoring Well H-11B2	C-2687	04/17/00	None	Active
70.	Office of New Mexico State Engineer	Monitoring Well H-11B3	C-2768	11/06/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
71.	Office of New Mexico State Engineer	Monitoring Well H-11B4	C-2769	11/06/00	None	P&A
72.	Office of New Mexico State Engineer	Monitoring Well H-12	C-2777	11/06/00	None	P&A
73.	Office of New Mexico State Engineer	Monitoring Well H-14	C-2766	11/06/00	None	Active
74.	Office of New Mexico State Engineer	Monitoring Well H-15	C-2685	04/17/00	None	Active
75.	Office of New Mexico State Engineer	Monitoring Well H-16	C-2753	11/06/00	None	Active
76.	Office of New Mexico State Engineer	Monitoring Well H-17	C-2773	11/06/00	None	Active
77.	Office of New Mexico State Engineer	Monitoring Well H-18	C-2683	04/17/00	None	Active
78.	Office of New Mexico State Engineer	Monitoring Well H-19B0	C-2420	01/25/95	None	Active
79.	Office of New Mexico State Engineer	Monitoring Well H-19B1	C-2420	01/25/95	None	Active
80.	Office of New Mexico State Engineer	Monitoring Well H-19B2	C-2421	01/25/95	None	Active
81.	Office of New Mexico State Engineer	Monitoring Well H-19B3	C-2422	01/25/95	None	Active
82.	Office of New Mexico State Engineer	Monitoring Well H-19B4	C-2423	01/25/95	None	Active
83.	Office of New Mexico State Engineer	Monitoring Well H-19B5	C-2424	01/25/95	None	Active
84.	Office of New Mexico State Engineer	Monitoring Well H-19B6	C-2425	01/25/95	None	Active
85.	Office of New Mexico State Engineer	Monitoring Well H-19B7	C-2426	01/25/95	None	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
86.	Office of New Mexico State Engineer	Monitoring Well P-14	C-2637	01/02/99	None	P&A
87.	Office of New Mexico State Engineer	Monitoring Well P-15	C-2686	04/17/00	None	P&A
88.	Office of New Mexico State Engineer	Monitoring Well P-17	C-2774	11/06/00	None	P&A
89.	Office of New Mexico State Engineer	Monitoring Well P-18	C-2756	11/06/00	None	P&A
90.	Office of New Mexico State Engineer	Monitoring Well WIPP-12	C-2639	01/12/99	None	P&A
91.	Office of New Mexico State Engineer	Monitoring Well WIPP-13	C-2748	11/06/00	None	Active
92.	Office of New Mexico State Engineer	Monitoring Well WIPP-18	C-2684	04/17/00	None	Active
93.	Office of New Mexico State Engineer	Monitoring Well WIPP-19	C-2755	11/06/00	None	Active
94.	Office of New Mexico State Engineer	Monitoring Well WIPP-21	C-2754	11/06/00	None	P&A
95.	Office of New Mexico State Engineer	Monitoring Well WIPP-25	C-2723	07/26/00	None	P&A
96.	Office of New Mexico State Engineer	Monitoring Well WIPP-26	C-2724	11/06/00	None	P&A
97.	Office of New Mexico State Engineer	Monitoring Well WIPP-27	C-2722	11/06/00	None	P&A
98.	Office of New Mexico State Engineer	Monitoring Well WIPP28	C-2636	01/12/99	None	P&A
99.	Office of New Mexico State Engineer	Monitoring Well WIPP-29	C-2743	11/06/00	None	P&A
100.	Office of New Mexico State Engineer	Monitoring Well WIPP-30	C-2727	08/04/00	None	P&A

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
101.	Office of New Mexico State Engineer	Monitoring Well H-6BR	C-3362	12/27/07	None	Active
102.	Office of New Mexico State Engineer	Monitoring Well H-15R	C-3361	12/27/07	None	Active
103.	Office of New Mexico State Engineer	Monitoring Well SNL-2	C-2948	02/14/03	None	Active
104.	Office of New Mexico State Engineer	Monitoring Well SNL-9	C-2950	02/14/03	None	Active
105.	Office of New Mexico State Engineer	Monitoring Well SNL-12	C-2954	02/25/03	None	Active
106.	Office of New Mexico State Engineer	Monitoring Well SNL-1	C-2953	02/25/03	None	Active
107.	Office of New Mexico State Engineer	Monitoring Well SNL-3	C-2949	02/14/03	None	Active
108.	Office of New Mexico State Engineer	Monitoring Well SNL-5	C-3002	10/01/03	None	Active
109.	Office of New Mexico State Engineer	Monitoring Well IMC-461	C-3015	11/25/03	None	Active
110.	Office of New Mexico State Engineer	Monitoring Well SNL-10	C-3221	07/26/05	None	Active
111.	Office of New Mexico State Engineer	Monitoring Well SNL-16	C-3220	07/26/05	None	Active
112.	Office of New Mexico State Engineer	Monitoring Well SNL-17	C-3222	07/26/05	None	Active
113.	US Environmental Protection Agency Region 6	Conditions of Approval for Disposal of PCB/TRU and PCB/TRU Mixed Waste at the US Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico	N/A	04/30/08	04/30/18	Active
114.	US Fish and Wildlife Service	Special Purpose – Relocate	MB155189-0	05/01/17	12/31/20	Active
115.	New Mexico Department of Game and Fish	Biotic Collection Permit	Authorization # 3293	02/02/17	12/31/19	Active
116.	Office of New Mexico State Engineer	Monitoring Well H-4bR	C-3404	01/13/09	None	Active
117.	Office of New Mexico State Engineer	Monitoring Well H-9bR	C-2783-POD2	07/14/10	None	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
118.	Office of New Mexico State Engineer	Monitoring Well C-2737	C-2737	09/27/00	None	Active
119.	Office of New Mexico State Engineer	Monitoring Well WIPP-11	C3112	12/27/07	None	Active
120.	Office of New Mexico State Engineer	Monitoring Well SNL-6	C-3151	02/10/05	None	Active
121.	Office of New Mexico State Engineer	Monitoring Well SNL-8	C-3150	02/10/05	None	Active
122.	Office of New Mexico State Engineer	Monitoring Well SNL-13	C-3139	12/17/04	None	Active
123.	Office of New Mexico State Engineer	Monitoring Well SNL-14	C-3140	12/17/04	None	Active
124.	Office of New Mexico State Engineer	Monitoring Well SNL-15	C-3152	02/10/05	None	Active
125.	Office of New Mexico State Engineer	Monitoring Well SNL-18	C-3233	10/06/05	None	Active
126.	Office of New Mexico State Engineer	Monitoring Well SNL-19	C-3234	10/06/05	None	Active
127.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-18 and SNL-19 well pads	NM115315	03/21/06	12/31/35	Active
128.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-11 and SNL-5	NM110735	10/17/03	10/17/33	Active
129.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-12 well pad	NM109176	04/15/03	04/15/33	Active
130.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-9 well pad	NM109175	04/15/03	04/15/33	Active
131.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-2 well pad	NM109174	04/15/03	04/15/33	Active
132.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-1 Access Road	NM109177	06/17/03	06/17/33	Active
133.	Department of the Interior, Bureau of Land Management	Right-of-Way for SPS 69KV Electric Distribution line	NM091163	12/16/94 (Southwestern Public Service)	12/15/24	Active

	Granting Agency	Type of Permit	Permit/Right of Way Number	Granted/ Submitted *	Expiration	Current Permit Status
134.	Office of New Mexico State Engineer	Monitor Well H-11b4R	C-2769-POD2	05/16/11	None	Active
135.	Office of New Mexico State Engineer	Monitor Well AEC-7R	C-3635	04/24/13	None	Active
136.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-1 Access Road	RW-28535	08/27/03	08/27/38	Active
137.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-3 Access Road	RW-28537	08/27/03	08/27/38	Active
138	Office of New Mexico State Engineer	Monitor Well H-12bR	C-3749 POD1	06/24/14	None	Active
139	Department of the Interior, Bureau of Land Management	Right-of-Way grant for H-12bR Access Road and well pad	NM-131916	06/19/14	12/31/43	Active
140	Office of New Mexico State Engineer	Monitor Well H-10cR	C-3851	07/09/15	None	Active

- 1
- 2 *Non DOE grantee is noted
- 3 P&A=Plugged and Abandoned

**APPENDIX B2
MAPS**

(This page intentionally blank)

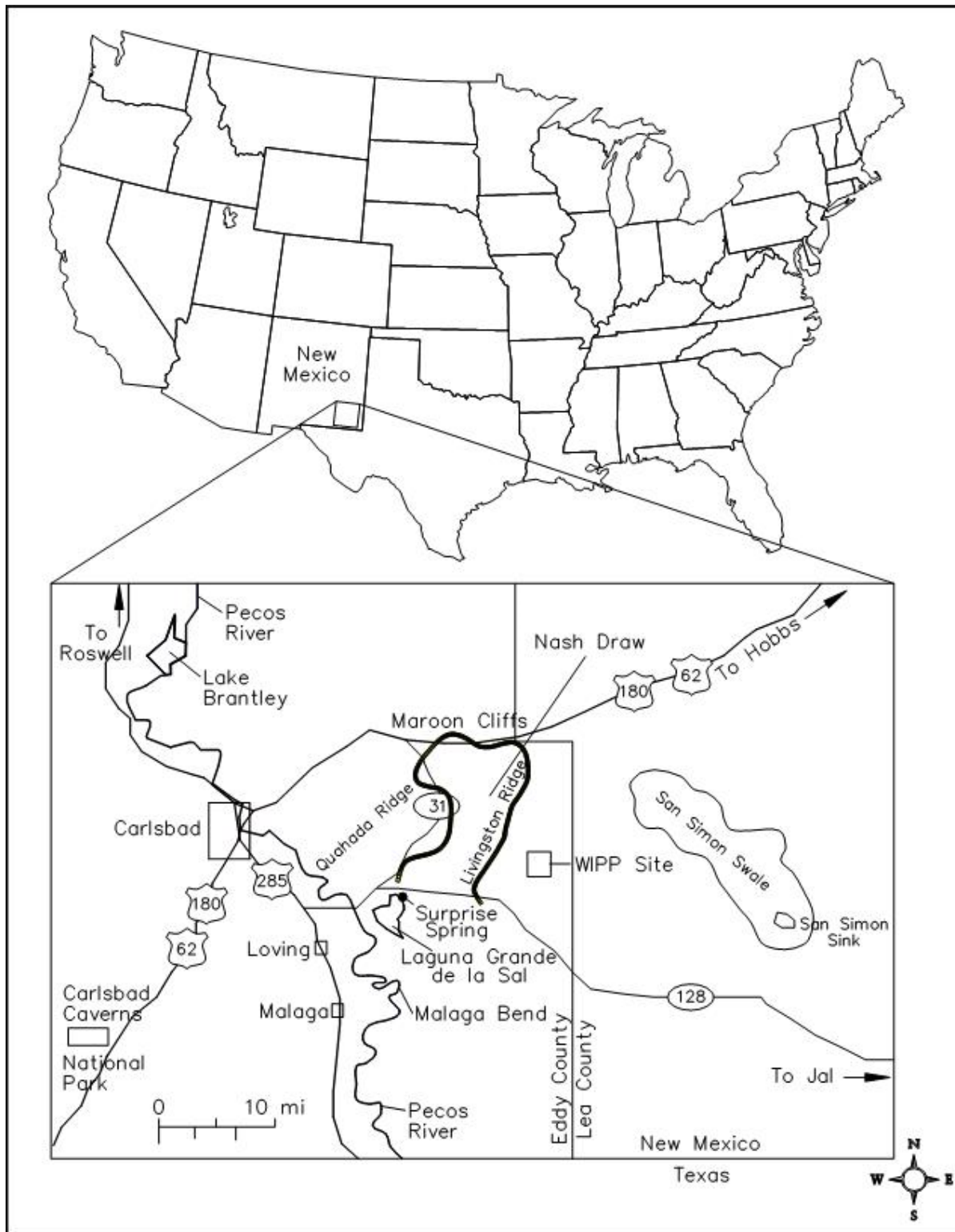


Figure B2-1
General Location of the WIPP Facility

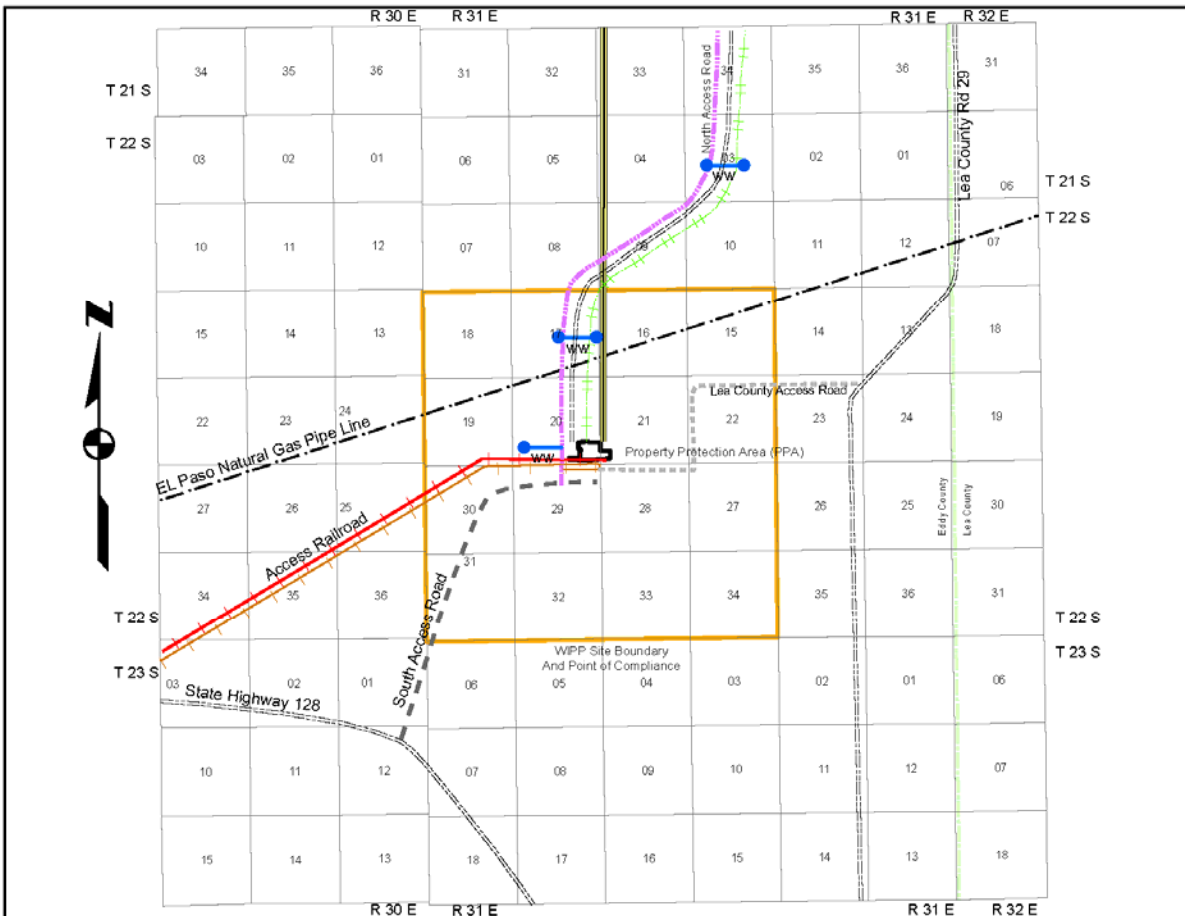













Figure B2-2
Planimetric Map-WIPP Facility Boundaries

Legend

-  WIPP Site Boundary 10,240 Acres.
-  U.S. DOE Right of Way Number NM-53809. For Waterline, 50 Feet Wide. The DOE had Agreed with the City of Carlsbad to Allow the Individuals to Tap this Line Located within the North Access Road Right of Way.
-  Tap Lines Connected to the Main WIPP Waterline.
-  Stock Water Tanks.
-  Southwestern Public Service Company Right of Way Number NM-43203 for Power 60 Feet Wide.
-  General Telephone of the Southwest Right of Way for Telephone Line, 30 Feet Wide, Located within the North Access Road Right of Way.
-  General Telephone of the Southwest Right of Way Number NM-60174 for Telephone Line, 30 Feet Wide, Located within the Railroad Right of Way.
-  U.S. DOE Right of Way Number NM-55675 for North Access Road, 170 Feet Wide.
-  U.S. DOE Right of Way for Access Roads Includes Right of Way Number NM-123703 for the South Access Road, 140 Feet Wide.
-  El Paso Natural Gas Company Right of Way for Gas Pipeline, 30 Feet Wide in Section 16, 50 Feet Wide Elsewhere.
-  U.S. DOE Right of Way Number NM-55699 for Access Railroad, 150 Feet Wide.

NOTES

1. The Property Protection Area is a fenced area of approximately 44 acres. It contains all surface facilities with the exception of salt storage piles, parking lot, landfill and waste water stabilization lagoons.
2. WIPP Site Boundary (WSB) provides a one mile buffer area around the area available for underground development

Figure B2-2a
Legend to Figure B2-2

**Replace this page with the Topographic Map
from the earlier version of the draft Permit**

**Figure B2-3
Topographic Map**

APPENDIX B3 FACILITIES

(This page intentionally blank)

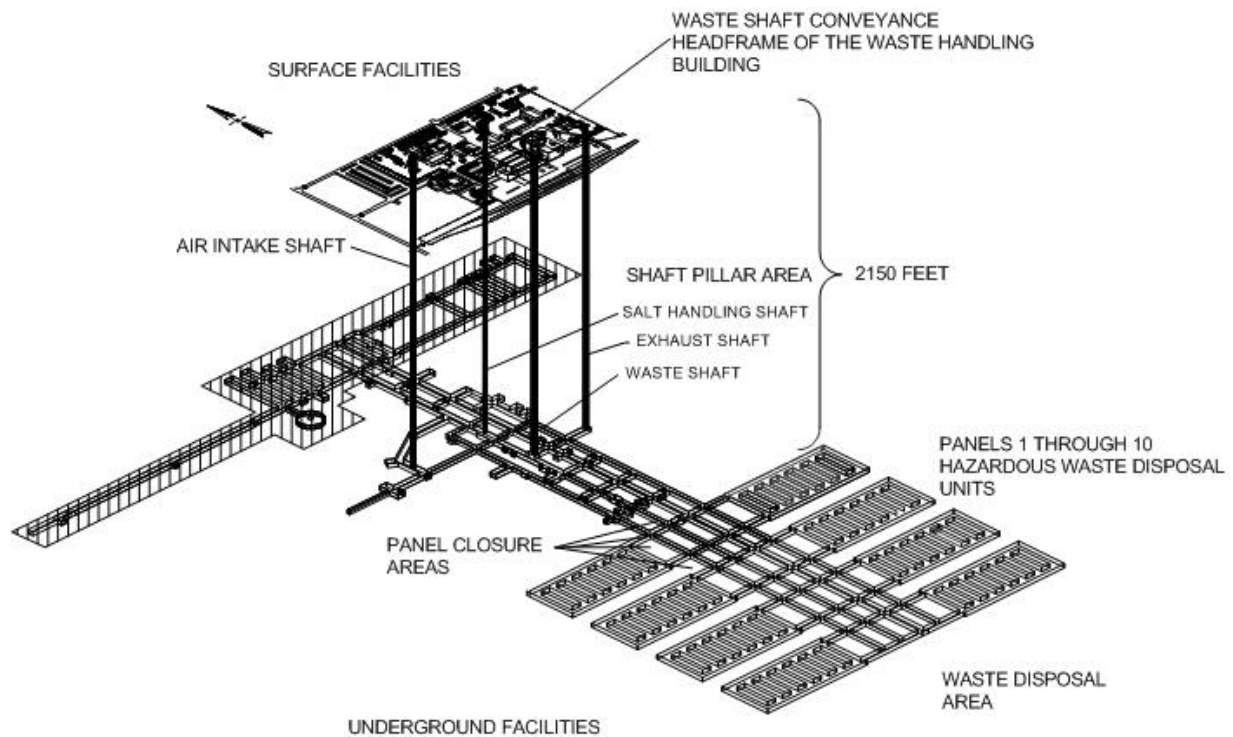


Figure B3-1
Spatial View of the WIPP Facility

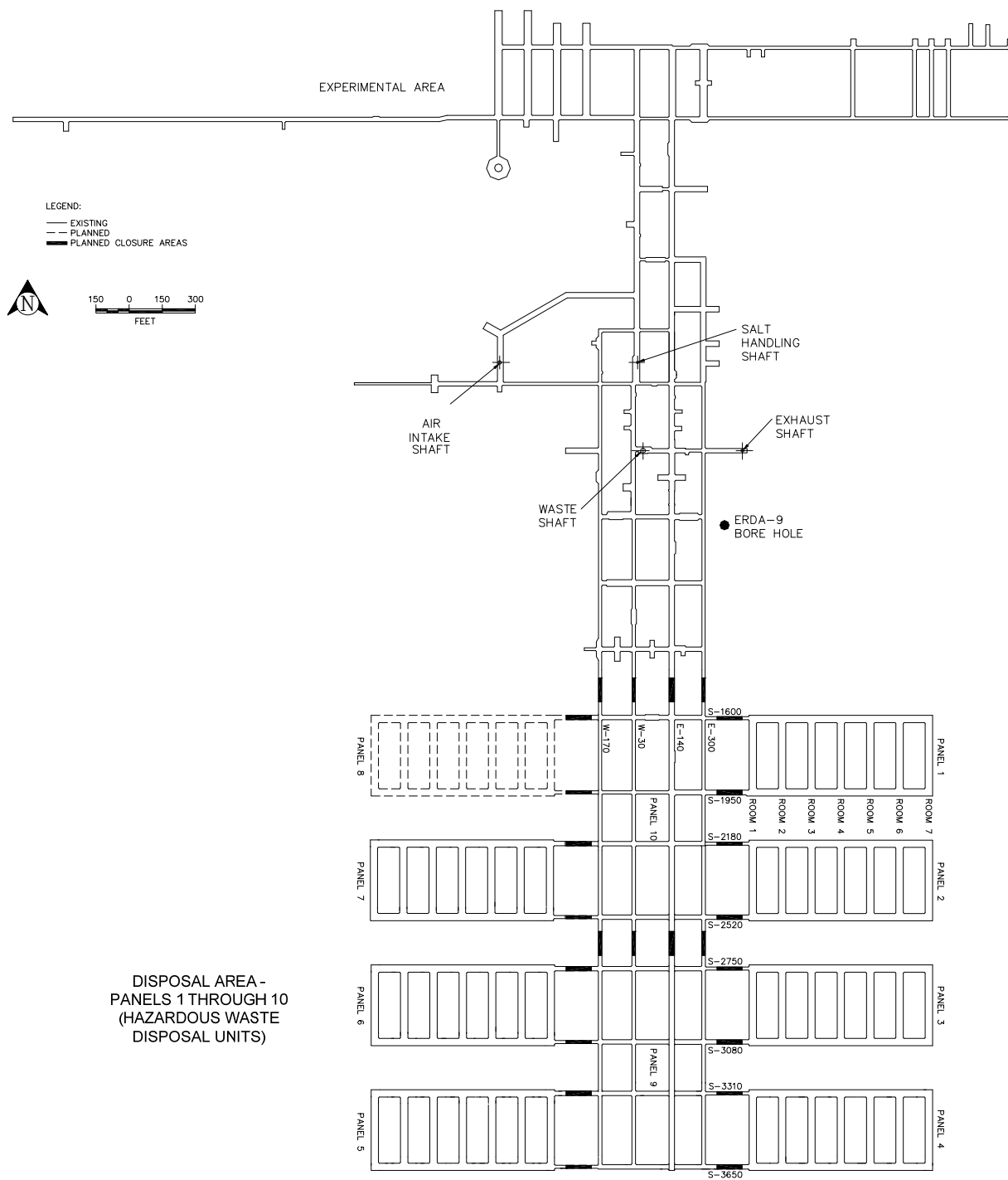


Figure B3-2
Repository Horizon

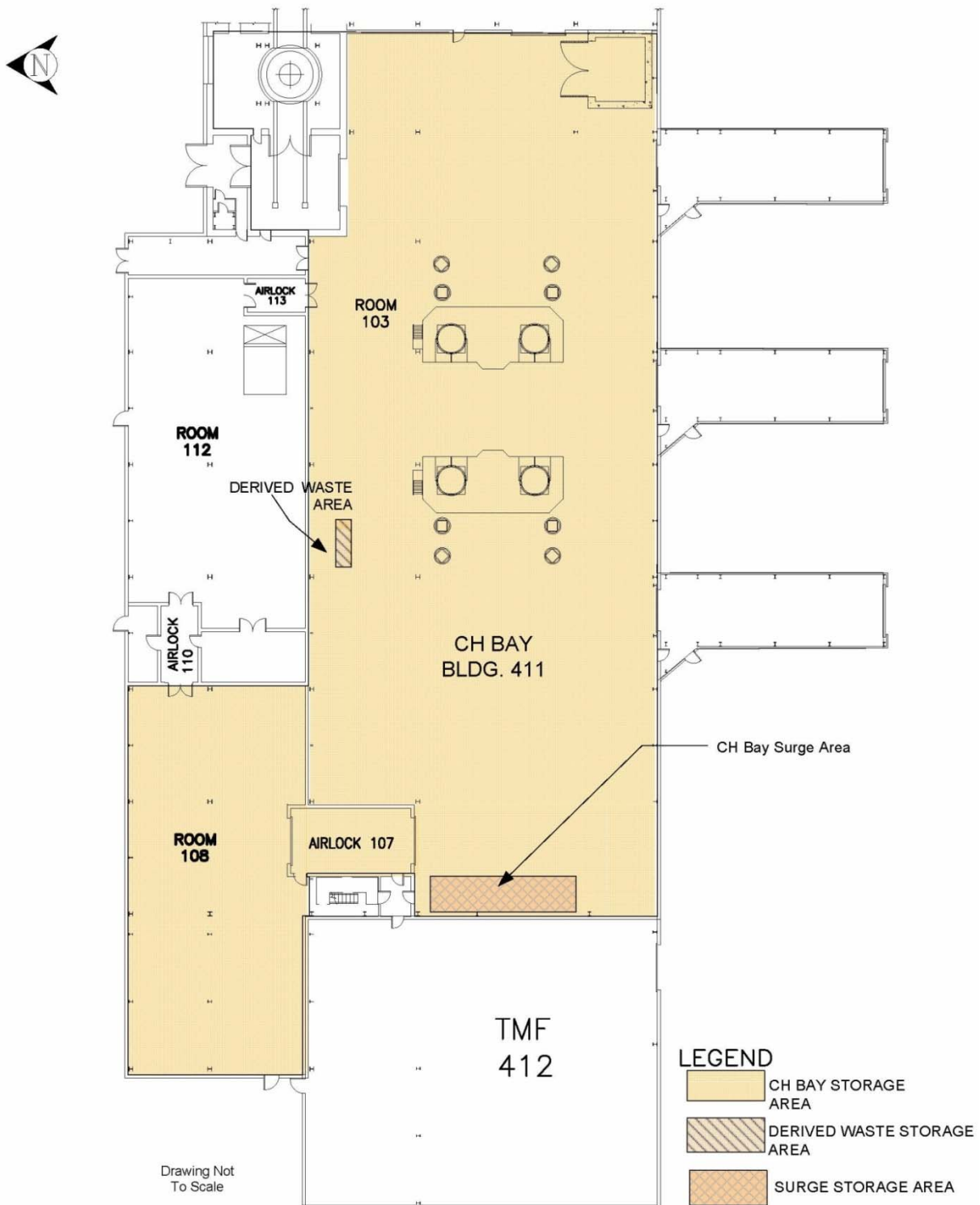


Figure B3-3
Waste Handling Building - CH TRU Mixed Waste Container Storage and Surge Areas

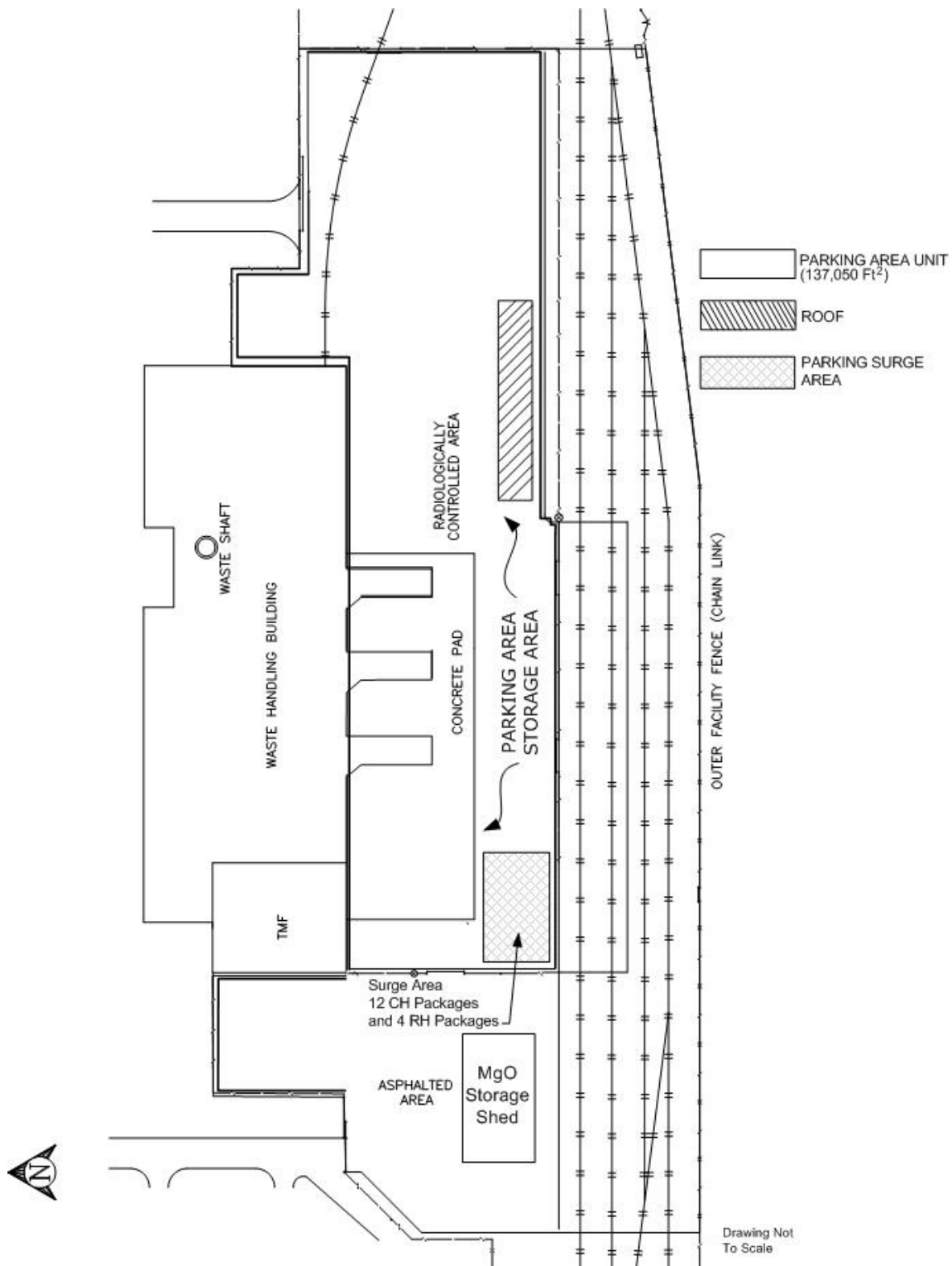


Figure B3-4
Parking Area-Container Storage and Surge Areas

**APPENDIX B4
PHOTOGRAPHS**

(This page intentionally blank)



Figure B4-1
Aerial Photograph of the Waste Isolation Pilot Plant



Figure B4-2
Underground - Panel One - Waste Disposal Room

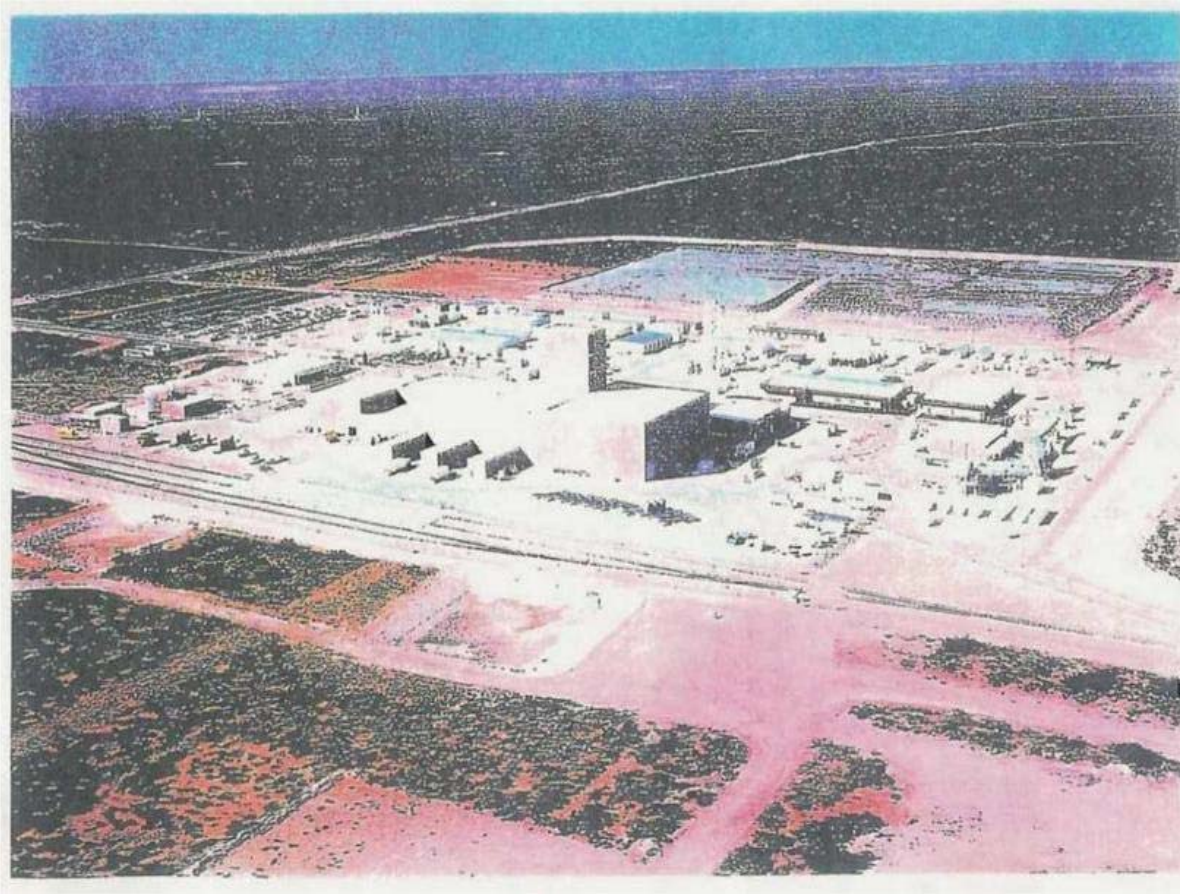


Figure B4-3
Aerial Photograph of the Waste Handling Building



Figure B4-4
TRUDOCKs in CH Bay of the Waste Handling Building



Figure B4-5
NE Corner of CH Bay of the Waste Handling Building



Figure B4-6
Westward View of CH Bay of the Waste Handling Building



Figure B4-7
Waste Shaft Conveyance - Loading Facility Pallet with CH Waste, Waste Handling Building



Figure B4-8
RH Bay (Photo Taken July 2000)



Figure B4-9
Cask Unloading Room and Bridge Crane



Figure B4-10
Hot Cell



Figure B4-11
Transfer Cell



Figure B4-12
Facility Cask Loading Room and Facility Cask Rotating Device