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

August 14, 2025

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

Subject: Notification of the Completion and Public Posting of the Third Triennial Review Report

Reference: Settlement Agreement and Stipulated Final Order No. HWB-14-2 (CO), January 22, 2016

Dear Mr. Nance:

The purpose of this letter is to notify the New Mexico Environment Department (NMED) that the enclosed Third Triennial Review Report for the Waste Isolation Pilot Plant (WIPP) facility was completed and made available to the public, as required by Paragraph 34b of the referenced Settlement Agreement and Stipulated Final Order. This report was made available to the public by posting it onto the WIPP Information Repository on August 15, 2025.

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

Sincerely,

Signatures on file

Mark Bollinger
Manager
Carlsbad Field Office

Ken Harrawood
Program Manager
Salado Isolation Mining Contractors

Enclosure

CBFO:ERCD:MG:RS:25-0557

cc: w/enclosure

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*ED denotes electronic distribution

Third Triennial Review Report
For the Waste Isolation Pilot Plant (WIPP)

Prepared for:
Salado Isolation Mining Contractors, LLC (SIMCO)

Prepared by:
Firewater Associates, LLC

July 28, 2025

Table of Contents

ACRONYMS AND ABBREVIATIONS

CBFO	Carlsbad Field Office
CMR	Central Monitoring Room
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CWA	Clean Water Act
CFR	Code of Federal Regulations
CH	Contact-Handled
DOE	United States Department of Energy
DP	Discharge Permit
EC	E. Coli Bacteria
EPCRA	Emergency Planning and Community Right to Know Act
EPA	United States Environmental Protection Agency
EHS	Extremely Hazardous Substances
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
GAO	United States General Accounting Office
GET	General Employee Training
GWQB	Ground Water Quality Bureau
HWA	Hazardous Waste Act
HWMU	Hazardous Waste Management Unit
ISMS	Integrated Safety Management System
LLC	Limited Liability Corporation
LOI	Lines of Inquiry
LEPC	Local Emergency Planning Committee
L&A	Longenecker & Associates
NEPA	National Environmental Policy Act
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMSWA	New Mexico Solid Waste Act
NMWQA	New Mexico Water Quality Act
NSR	New Source Review
NWP	Nuclear Waste Partnership LLC
POC	Point of Contact
PWS	Public Water System
QAP	Quality Assurance Plan
ROR	RCRA Operating Record
RH	Remote-Handled
RICE	Reciprocating Internal Combustion Engine
RIDS	Records Inventory and Disposition Schedule
RCRA	Resource Conservation and Recovery Act
SDS	Safety Data Sheets
SSCVS	Safety Significant Confinement Ventilation System
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Commission

SIMCO	Salado Isolation Mining Contractors, LLC
SOW	Statement of Work (WIPP Triennial Review Scope of Work and Guidelines)
SME	Subject Matter Expert
SEP	Supplemental Environmental Project
TC	Total Coliform
TRU	Transuranic
TRUPACT	Transuranic Waste Transportation Container
TSCA	Toxic Substances Control Act
TMF	TRUPACT Maintenance Facility
VOC	Volatile Organic Compound
WDS	Waste Data System
WIPP	Waste Isolation Pilot Plant

Third Triennial Review Final Report

July 28, 2025

1. INTRODUCTION

The Third Triennial Review (Review) of the Waste Isolation Pilot Plant (WIPP) is the result of a Settlement Agreement between the New Mexico Environment Department (NMED), the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) and Nuclear Waste Partnership LLC (NWP). The Settlement Agreement was to resolve alleged violations of the New Mexico Hazardous Waste Act (HWA), NMSA 1978, Sections 74-4-1 to -14, the Hazardous Waste Management Regulations, 20.4.1 New Mexico Administrative Code (NMAC), and the WIPP Hazardous Waste Facility Permit (Permit). Specifically, Paragraph 34 of the Settlement Agreement and Stipulated Final Order (SFO) dated January 22, 2016, states *"DOE will fund independent, external triennial reviews of environmental regulatory compliance and operations at WIPP to ensure that any regulatory deficiencies are identified".* Performance of Triennial Review requirements has been transferred to Salado Isolation Mining Contractors, LLC (SIMCO), Management and Operating Contractor (MOC) to DOE at the WIPP site.

The Review is designed to be a systematic, independent, and documented process of objectively obtaining and evaluating evidence to determine whether specified environmental regulatory requirements are met at the WIPP facility. The Review is intended to evaluate the integrity of the regulatory compliance processes implemented at the WIPP facility under legislation, permits, DOE Orders, notices, and agreements.

The DOE CBFO has funded the independent, external Triennial Review in accordance with Paragraph 34 of the SFO. Firewater Associates, LLC (Firewater) was selected as the independent firm to conduct the Third Triennial Review. In accordance with its contract with SIMCO, Firewater developed a Review Plan to conduct the WIPP Third Triennial Review. The Review Plan incorporates the requirements of the *Triennial Review Scope of Work and Guidelines* (SOW) – a document that the SFO required DOE and SIMCO to submit to NMED for approval. The final criteria checklists were designed to guide on-site observations and help the Team assess whether collected evidence met the review criteria. The Review Plan also specifies the methodologies that the Triennial Review Team (Review Team or Team) utilized to conduct the Review.

As a contract deliverable, Firewater and its team subcontractor Longenecker & Associates (L&A), have documented the results of this latest review in the Third Triennial Review Report (Report) contained herein. This Report documents: 1) the Review objectives; 2) the Review scope, 3) the Review Team members; 4) the Review Methodology, 5) the Review activities; and 6) the Review Team's findings, observations, and recommendations. The Report was submitted as a draft to SIMCO for factual accuracy review prior to its finalization.

2. REVIEW OBJECTIVES

The primary objective of the Review was to determine whether specified regulatory requirements within the designated scope areas were properly implemented at the WIPP facility during calendar years 2022 - 2023. In those areas, the Review sought to identify potential regulatory deficiencies, potential violations (referred to as non-compliances), and deficiencies that could lead to non-compliances to applicable regulations (for this report referred to as "Findings" in Section 7).

The Review Team also identified areas of improvement that SIMCO could address and utilize to mitigate immediate risks, as well as make process improvements to prevent future risks (referred to as "Observations in Section 7). Further, the Review Team identified potential vulnerabilities (also included in the "Observations" in Section 7) that could be embedded in current programs or that could involve unresolved issues that relate to current or future changes in regulations, personnel, procedures, or programs. The secondary objectives of the Review were to consider challenges related to the effective implementation of the environmental programs at the WIPP facility and the strengths that reflect the maturity of those programs.

As agreed with NMED, the review covers the activities performed in 2022 and 2023, and builds on the work performed on the First and Second Triennial Reviews that were completed in 2018 and 2021, respectively. One of the conditions of the Supplemental Environmental Project (SEP) that describes the Triennial Review process is that the Permittees will be given an opportunity to correct non-compliant conditions identified from the Review, within 60 days of issuance of the Final Review Report or on another schedule approved by the NMED. Conditions corrected during the Review, if applicable, have been reassessed by the Review Team for adequacy.

3. SCOPE

The Review focused on the following environmental statutes, regulations, and orders, consistent with the SOW:

- Resource Conservation and Recovery Act (RCRA) and New Mexico implementation through the Hazardous Waste Act
- Clean Air Act (CAA), including the National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the New Mexico Air Quality Act
- Clean Water Act (CWA) and the New Mexico Water Quality Act
- New Mexico Solid Waste Act (NMSWA)
- Emergency Planning and Community Right to Know Act (EPCRA), and the New Mexico Hazardous Chemicals Information Act
- Toxic Substances Control Act (TSCA), and polychlorinated biphenyl (PCB) Conditions of Approval
- National Environmental Policy Act (NEPA)
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the New Mexico Pesticide Control Act

The Review Team evaluated current WIPP facility programs, plans and procedures for compliance with the above statutes, regulations, and orders at surface and underground structures/facilities at the WIPP facility.

4. REVIEW TEAM

4.1 Personnel

The Triennial Review Team was made of seven team members from two contractors - Firewater Associates, LLC (Firewater) and Longenecker & Associates (L&A). Team member resumes can be found in Attachment D. The Review Team was comprised of a Program Manager and Subject Matter Experts (SMEs) that included the following individuals:

Team Member	Affiliation
Renee Echols	Firewater Associates, LLC Team Lead
Gregory Edwards	Firewater Associates, LLC Team Technical Lead
Kathryn Roberts	Longenecker & Associates Technical Advisor
David Wilson	Longenecker & Associates Regulatory SME
Ashley Meyer	Longenecker & Associates Regulatory SME/Administrative Support
Brian Hennessey	Longenecker & Associates Regulatory SME
Shelly Wilson	Longenecker & Associates Regulatory SME

4.2 Responsibilities

Each Team member was responsible for developing lines of inquiry (LOI) for each of the criteria assigned to them. Additionally, Review Team members considered the following factors when developing LOIs:

- Accuracy of reporting and documentation
- Identifying precursors of future non-compliances
- Lessons learned from previous DOE complex wide environmental violations
- Impacts on the client
- Schedule/timetable adherence
- Communication
- Confidentiality and information security

5. METHODOLOGY

The SOW required that a Quality Assurance Plan (QAP) be developed to describe the necessary controls required for the Review Team to identify and document their results and conclusions. The QAP considered the unique synergy between the various and complex environmental regulations and those organizations that interact with them to ensure that compliance is achieved. The QAP provided direction and guidance to the Review Team to incorporate cost-effective and timely quality measures to promote efficient delivery of the Review that met the requirements outlined in the SOW. The QAP provided the primary requirements for integration of quality functions into all aspects of the review process. Effective implementation of review methods and requirements supports the principles and functions of the DOE Integrated Safety Management System (ISMS), documented in DOE/CBFO-09-3442 "*CBFO Integrated Safety Management System Description"*.

The Team also developed, for SIMCO approval, a Review Plan that in concert with the QAP guided the methodologies used in the Review. In accordance with the Review Plan, the Review Team developed criteria checklists for each of the assigned areas (e.g., RCRA, CWA). The criteria checklists were reviewed by SIMCO for consistency with the NMED approved *Third Waste Isolation Plant Project Triennial Review Scope of Work and Guidelines* (scope of work and guidelines) prior to the on-site portion of the Review. The final criteria checklists were designed to guide on-site observations and help the Team assess whether collected evidence met the review criteria.

5.1 Criteria Selection

This section describes the methodology employed by the Review Team in determining the specific criteria to be evaluated in each of the nine areas (i.e., RCRA, CAA, CWA, NMSWA, EPCRA, TSCA, NEPA, CERCLA and FIFRA). In general, criteria were generated from specific language in the controlling document (i.e., will, shall, must), but other criteria were added based on the Review Team's evaluation of language that conveyed intent to require an action by SIMCO. In addition, the Review Team added criteria based on its experience with operations in regulated facilities and the associated risks. The language used in the "Required Program" (question to be answered) column of the associated Criteria Workbook also reflects that experience. Finally, Criteria were added to evaluate actions related to findings, observations and recommendations made in past Reviews for the relevant areas.

Resource Conservation and Recovery Act (RCRA) and New Mexico implementation through the HWA

Requirements listed in the WIPP RCRA Permit that do not directly relate to current activities at the facility (e.g., final closure, post-closure) were not included in the Review criteria. This Third Triennial Review covers calendar years 2022 and 2023, during which the renewed Permit became effective (November 2023). These determinations were made based on the Team's subject matter knowledge, and in consultation with SIMCO. Additionally, there were specific areas of the Permit (e.g., waste characterization at generator sites, transportation, packaging) that were outside the scope of the Third Triennial Review because they are not activities carried out at the WIPP facility and were

therefore outside the scope of the SFO. Finally, most provisions identified in the Permit Attachments are referenced in the relevant Permit Parts. Therefore, the Team did not duplicate the criteria but instead cross-referenced the applicable Permit Part or Attachment in the checklists where appropriate.

In addition to criteria developed from direct requirements of the Permit, criteria associated with non-Permit requirements associated with 40 Code of Federal Regulations (CFR) Part 262 and 40 CFR Part 761 directives were also included. At the request of SIMCO, permit requirements related to remote-handled (RH) transuranic (TRU) waste management were not addressed based on the decision that RH TRU waste received in RH-TRU 72 B casks (packaging) had not been received at WIPP facility during this Review period.

The Team evaluated the Parts and Attachments of WIPP's Permit with the following exceptions:

- Permit Part 6 – *Closure Requirements*: The Team did not evaluate the majority of Permit Part 6 because the WIPP facility is still actively receiving waste. However, the Team did evaluate the closure requirements for the filled panels and those no longer receiving waste (Panels, 1, 2, 3, 4, 5, 6, and 7), including commitments on closure methodology, design, and schedule requirements for routine inspections of panel closure features.
- Permit Attachment A – *General Facility Description and Process Information*: The Team did not evaluate Permit Attachments A, A1, A2, A3 or A4 because these Attachments provide descriptive language about the facility, rather than Permit requirements. Furthermore, references to Attachments A1, A2, A3, and A4 are captured throughout the Permit Parts (particularly Permit Parts 3 & 4) and were addressed by the Team during the Review.
- Permit Attachment B – *Part A Application*: Attachment B is the WIPP facility's RCRA Part A Permit application provided as information within the regulatory record. As such, there are no requirements to be evaluated. The requirements resulting from this application are contained in the Permit itself and were evaluated during the Review.
- Permit Attachment I – *Compliance Schedule*: The Team did not evaluate Permit Attachment I because there is not a current Compliance Schedule.
- Permit Attachment J – *Hazardous Waste Management Unit Tables*: Attachment J is a table that lists the Hazardous Waste Management Units (HWMUs). There are no requirements listed in Attachment J. The requirements for each HWMU are addressed in the individual Permit Parts/Attachments and were evaluated during the Review.
- Permit Attachment M – *Figures*: Prior to the renewal Permit, Permit Attachment M was reserved. Figures were added in the renewal Permit and those Figures were evaluated as appropriate for the timeframe and in conjunction with other Permit Sections that were evaluated.

Clean Air Act (CAA) including the National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the New Mexico Air Quality Act

Applicable portions of the CAA Regulations, including NESHAPs, and the New Mexico Air Quality Act were reviewed. This included the standards of performance for new stationary sources (40 CFR, Part 60, Subpart IIII), the NESHAPs (40 CFR Part 61, Subpart H) and the national emissions standards for hazardous air pollutants for source categories (40 CFR Part 63, Subpart ZZZZ). The WIPP facility has two reciprocating internal combustion engine (RICE) generators on-site for emergency power backup-up. Therefore, the Review focused on the monitoring, inspection, and reporting requirements for these minor sources. Two newer back-up diesel generators serving the new ventilation system – the "Safety Significant Confinement Ventilation System" (SSCVS) were issued exemptions by the New Mexico Air Quality Board in 2024 (after the period covered by this review) so they are not included.

Clean Water Act (CWA) and the New Mexico Water Quality Act

Applicable sections of the New Mexico Water Quality Act (NMWQA) were reviewed. Additionally, Discharge Permit (DP) 831 was reviewed in its entirety, and the Permit provisions were evaluated with the following exceptions:

- Conditions 79-88 of DP 831 are common to all discharge permits issued by the NMED-Groundwater Quality Bureau (GWQB). These provisions outline administrative processes that must be followed, such as submitting modifications or amendments to the Permit or payment of fees. For the purposes of the Review, the Team focused on the process provisions of the Permit (rather than administrative) because violations of these provisions could potentially result in releases to the environment. Preventing releases to the environment is the primary objective of the NMWQA and DP 831.

New Mexico Solid Waste Act (NMSWA)

Applicable sections of the New Mexico Administrative Code (NMAC) were reviewed. This includes the requirements of the Solid Waste Management General Requirements (Title 20, Chapter 9, Part 2) and the Special Waste Requirements (Title 20, Chapter 9, Part 8). The NMAC is the official collection of current rules and regulations written and filed by state agencies to clarify and interpret laws passed by the State Legislature. The noted sections establish the requirements for a facility to properly manage any generated or received solid and special waste, as applicable to the WIPP facility.

Emergency Planning and Community Right to Know Act (EPCRA) and the New Mexico Hazardous Chemicals Information Act

Applicable portions of the EPCRA and the New Mexico Hazardous Chemicals Information Act were reviewed. The EPCRA of 1986 was created to help communities plan for chemical emergencies. It also requires industry to report on the storage, use, and releases of hazardous substances to federal, state, and local governments. EPCRA

requires state and local governments, and Indian tribes to use this information to prepare for and protect their communities from potential risks. For this Review, the Team focused on the implementing regulations at 40 CFR Part 355 – Emergency Planning and Notification, which establishes requirements for a facility to provide information necessary for developing and implementing state and local chemical emergency response plans, and requirements for emergency notification of chemical releases.

Toxic Substances Control Act (TSCA), and polychlorinated biphenyl (PCB) Conditions of Approval

Criteria under the TSCA, *Disposal of PCB/TRU and PCB/TRU Mixed Waste at the U.S. Department of Energy (DOE) WIPP Carlsbad, New Mexico Conditions of Approval (EPA Conditions of Approval)*, were selected based on the current operations at the WIPP facility. In addition to criteria developed as direct requirements of the Conditions of Approval, criteria associated with the applicable PCB regulations found in 40 CFR 761 were also included.

National Environmental Policy Act (NEPA)

NEPA is a comprehensive federal legislative policy statement pertaining to protection of the environment that requires federal agencies to consider the potential environmental impacts of new projects and activities. The DOE codified its own NEPA regulations (10 CFR Part 1021) to implement the NEPA review process. The review criteria for this section were developed to confirm that the WIPP facility had the needed programs and procedures to ensure that the applicable requirements of 10 CFR Part 1021 are being met.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

The review criteria were selected to examine the WIPP facility's CERCLA hazardous substances identification, management, inventory control, release notification, and hazard communication procedures and practices for conformance to the requirements of 40 CFR Part 302 – Designation, Reportable Quantities, and Notification, a portion of the regulations implementing CERCLA.

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the New Mexico Pesticide Control Act (NMPCA)

The review criteria selected focused on the proper certification of the pesticide application technician(s) at the WIPP facility and the financial liability protection maintained by the applicator's employer. In addition, the review verified that the procurement process for pesticide application services by the contractor ensured that the service provider met the technical and financial requirements of NMPCA.

5.2 Selection of Reports, Inspection Forms and Training Records for Review

When determining which inspection forms or which employees' training records, within a training category, should be examined to determine whether the regulatory requirements were being met, the Review Team used the following methodology:

- For determining the number of samples to be reviewed for various size sample populations (i.e., daily, weekly, monthly, and semi-annually), the Team chose values commonly used in statistical selection. These values were used to determine the number of records for selection from each group of records to achieve a high degree of confidence in the review results. A random number generator was then used to select which records from those groups would undergo an in-depth review.
- For documents (i.e., inspection forms), the Team first determined the timeframe that would establish the available population. The publication/production dates within each document frequency group (i.e., daily, weekly, monthly, and semi-annually) were sequentially numbered. A random number generator was then used to select the specific document dates to be reviewed.
- For selection of personnel for in-depth review of training compliance, the list of personnel for each training category, as defined in Permit Attachment F, was numbered sequentially. A random number generator was then used to select the personnel from each training category to be examined in-depth.

6. REVIEW ACTIVITIES

Team members performed a thorough document review (e.g., program plans, procedures, instructions, other documentation), and conducted interviews of relevant SIMCO personnel, both remotely and in person. While conducting the on-site portion of the Review, inspections of relevant areas were made, interviews of operating personnel were conducted, and photos were taken by the SIMCO-provided photographer for documentation purposes.

The Review Team evaluated 621 individual criteria across the nine focus areas identified in the regulatory areas noted in Section 3 of this Report. These activities resulted in Findings, Recommendations and Observations that are included in Section 7 of this Report.

Table 1 below is a summary of the Review Team's activities that include document and photo review/assessment, personnel interviews and inspections/observations.

6.1 Document Review

The Triennial Review Team reviewed the following documents:

Table 1 – Document Review	
Criteria Area	**Procedures**
RCRA Permit Part 1	**Documents:** • WP 02-EC.06(REV 15), WIPP Site Effluent and Hazardous Waste Materials Sampling Plan • WP 02-EC1001(REV19), Characterization, Sampling, Shipping and Documentation • WP 02-EC3506(REV 12), Environmental Incident Reporting • WP 02-EM.02(REV 7), Integrated Sample Control Plan • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Reporting and Notifications Compliance Plan • WP 02-PC3005(REV 4), Hazardous Waste Facility Permit Notification and Reporting • WP 02-RC.01(REV 14), Hazardous and Universal Waste Management Plan • WP 02-RC.05(REV 10), Low-Level and Mixed Low-Level Waste Management Plan • WP 02-RC3109(REV 16), Waste Accumulation Area Inspections • WP 02-RC3111(REV 9), Information Repository • WP 02-RC3112(REV 7), Stakeholder Documents and E-mail Notification System • WP 02-RC5000(REV 4), RCRA Operating Record Maintenance • WP 04-CO.01(REV 8), Conduct of Operations • WP 08-NT.12(REV 10), WIPP Transportation Program • WP 12-ER3907(REV 8), Operational Emergency Notifications • WP 12-ER4926(REV 13), CMR Expanded Staffing Operations • WP 12-15(REV 7), WIPP Emergency Management Notification and Communications Plan • WP 12-17(REV 9), WIPP Emergency Management Training Program Plan • WP 15-RM (REV 13), WIPP Records Management Program Plan • WP 15-RM3017(REV 0), Records Disposition • WP 15-RM3018(REV 0), WIPP Document Control • WP 15-RM3019(REV 0), WIPP Records Management • HWFP Attachment D - RCRA Contingency Plan • Guidance on which SIMCO Transmittals Require Certification – Signatures • 2025 WIPP Community Relations Plan **Completed Forms and Reports:** • EA12ER4926-7-0, RCRA Contingency Plan Implementation Decision List • RCRA Contingency Plan Implementation Reports, April 9, 2022, October 23, 2022, and October 30, 2023, incidents • NMED Inspection Letters – January 2022, April 2023, April 2024 • WIPP 2023 RCRA Biennial Hazardous Waste Report • DOE/WIPP-24-3591, WIPP Annual Site Environmental Report for 2023 • Waste Isolation Pilot Plant Waste Minimization Reports, 2022, 2023 and 2024

	• Semi-Annual Volatile Organic Compound Data Summary Reports for 2022, 2023 and 2024 • WIPP Community Forums Documentation 2022 through 2024 • Surface Central Accumulation Area Inspections • Surface Satellite Accumulation Area Inspections • 2023-02-04 NMED HWB Approval of Class 1 Star Permit Modification Notification
RCRA Permit Part 2	**Documents:** • EA12ER4926-7-0(REV 3), RCRA Contingency Plan Implementation Decision Checklist • WP 02-EC1001(REV 19), Characterization, Sampling, Shipping, and Documentation • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Permit Reporting and Notifications Compliance Plan • WP 02-RC.01(REV 14), Hazardous and Universal Waste Management Plan • WP 02-RC.05(REV 10), Low-Level and Mixed Low-Level Waste Management Plan • WP 02-RC5000 (REV 4), RCRA Operating Record Maintenance • WP 04-ED1301(REV 22), Diesel Generator Operation • WP 04-ED1341(REV 16), Surface Backup Power Distribution • WP 05-WH1036(REV 17), Surface Site-Derived Mixed Waste Handling • WP 05-WH1039(REV 1), Derived Waste Container Data Entry in WDS • WP 08-NT.12(REV 10), WIPP Transportation Program • WP 08-NT3020(REV 33), TRU Waste Receipt • EA12ER4926-1-0(REV 20), CMR Expanded Staffing Checklist • WP 15-CA1010(REV 4), Occurrence Reporting and Processing • WP 17-2, Waste Isolation Pilot Plant Site Security Plan • WP 17-SPO1001, Entry Control Facility • WP 17-SPO1003, Patrols • WP 17-SPO1008, Badge Issuance and Visitor Control • WP 17-SS1003, Safeguards and Security Site Security Plans • WP 17-SS1004, Safeguards and Security Modified Security Plans • WP 17-SS1011, Safeguards and Security Access Control and Escort Requirements • DOE/WIPP-17-3573(REV 5), WIPP Emergency Management Plan **Completed Forms and Reports:** • WIPP Annual Site Environmental Report for 2022 (September 29, 2023) • WIPP Annual Site Environmental Report for 2023 (September 5, 2024) • 2024 Repository Siting Annual Report • Action Request #2404161 - Backfill on PPA • Action Request #2500955 - East Gate Is Not Operational • Action Requests #2501259 - ECF North Lane East Door Is Not Securing • Diesel Generator Inspection records from 2022, 2023, 2024 (randomly selected) • Waste Isolation Pilot Plant 2023 Waste Minimization Report • DOE/WIPP-23-3591, Waste Isolation Pilot Plant Biennial Environmental Compliance Report for Reporting Period April 1, 2020 through March 31, 2022 • DOE/WIPP-24-3526, Waste Isolation Pilot Plant Biennial Environmental Compliance Report for Reporting Period April 1, 2022 through March 31, 2024

	• Waste manifests for shipments SR250003 and SR250005 (April 8–17, 2025) • Hazardous Waste Manifests for Shipments (randomly selected) • NMED Review of 2022 WIPP Biennial Environmental Compliance Plan **Photos:** • Photograph No. 61, Signage on Controlled Gate • Photograph No. 63A, Signage in English and Spanish • Photograph No. 65A, View of Signage From Afar • Photograph No. 68, Caution, Danger, and No Trespassing Signage • Photograph No. 76, Backup Diesel Generator Condition
RCRA Permit Part 3	**Documents:** • WP 02-EC1001 (Rev 19), Characterization, Sampling, Shipping, and Documentation Forms, Reports • WP 02-RC3109 (Rev 16), Waste Accumulation Area Inspections • WP 02-RC5000 (Rev 4), RCRA Operating Record Maintenance • WP 05-WH1025 (Rev 39), CH Waste Downloading and Emplacement • WP 05-WH1036 (Rev 15), Surface Site-Derived Mixed Waste Handling • WP 05-WH1101 (Rev 37), CH Surface Transuranic Mixed Waste Handling Area Inspections • WP 08-NT.12 (Rev 10), WIPP Transportation Program • WP 08-NT3001 (Rev 5), Volume Control of Parking Area Storage Unit • WP 08-NT3020 (Rev 33), TRU Waste Receipt • WP 08-NT3020 (Rev 33), TRU Waste Receipt, Attachment 1 – TRU Waste Receipt Checklist • EA05WH1101-1-0 (Rev 1), Surface CH TRU Mixed Waste Handling Area Preoperational Inspection **Completed Forms and Reports:** • CH Bay Surge Storage Notification to NMED from August 25, 2021 • WP 05-WH1101, HWFP Table E-1, Parking Area unit and CH Container Storage Area Weekly Inspection Records **Photos:** Photograph No. 15A, Mixed Waste Staging Area Signage Photograph No. 18, As-Received TRUPACTs in PAU storage Shed Photograph No. 23, CH Bay Waste Drums in Designated Area Photograph No. 24, CH Bay Waste Drums on Pallets with Proper Spacing
RCRA Permit Part 4	**Documents:** • WP 02-PC.03(REV 13), WIPP HWFP Reporting and Notifications Compliance Plan • WP 02-PC3005(REV 4), Hazardous Waste Permit Notification and Reporting • WP 02-RC3111(REV 9), Information Repository • WP 02-RC3112, Stakeholder Documents and E-Mail Notification System • WP 04-CO.01, Conduct of Operations • WP 04-VU1001, Surface Underground Ventilation and Filtration System Operation

	• WP 05-WH1011 and 05-WH1015, CH Waste Processing Datasheets - Witnessed Process • WP 05-WH1810, Underground Transuranic Mixed Waste Disposal Area Inspections • WP 07-EU1301, Attachment 2, GIS Field Data Sheet - Completed • WP 07-EU1303, Geomechanical Instrument Data Processing • WP 08-NT3020(REV 33), TRU Waste Receipt • WP 12-IS.01-1(REV 12), Industrial Safety Program – Barricades and Barrier • WP 12-VC.01(REV 17), Volatile Organic Compound Monitoring Plan • EA04AD3001-SR47, LCO Surveillance Data Sheet • Engineering Drawings of Panels 1 Through 8 • Guidance on Which Transmittals Require Certification-Signatures 07/18/13
RCRA Permit Part 5 & Attachment L	**Documents:** • WP 02-1(REV 18), WIPP Groundwater Monitoring Program Plan • WP 02-EC1003(REV 15), Low-Flow Groundwater Purging and Sampling • WP 02-EM1002(REV 11), Electric Submersible Pump Operation and Maintenance Purging • WP 02-EM1010(REV 6), Field Parameter Measurements and Final Sample Collection • WP 02-EM1014(REV 14), Groundwater Level Measurement • WP 02-EM1026(REV 8), Water Level Data Handling and Reporting • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Permit and Notifications Compliance Plan • WP 02-PC3002(REV 15), WIPP Hazardous Waste Facility Permit Change Request, Modification Processing and Implementation • WP 10-AD3029(REV 18), Calibration and Control of Monitoring and Data Collection Equipment • WP 13-1(REV 44), WIPP Quality Assurance Program Description • SP9-9(REV 0), Analysis Report for Preparation of the Culebra Potentiometric Surface Contour Map, Sandia National Laboratories • DOE/WIPP 06-3339(REV 11), WIPP Groundwater Protection Program Plan • WIPP RCRA Operating Record List **Completed Forms and Reports:** • Annual Culebra Groundwater Report for 2024 • Semi-Annual Groundwater Surface Elevation Report Water Level Monitoring Program for 2024 • Semi-Annual Discharge Monitoring Report for July 1, 2023 through December 31, 2023, Discharge Permit 831 • WIPP Annual Site Environmental Reports for 2022 and 2023
RCRA Permit Parts 6-8, Attachments	**Documents:** • WP 04-AU1007, Underground Openings Inspections • WP 05-WH.04, WIPP Waste Operations Training Program Plan • WP 15-RM, WIPP Records Management Program Plan • Complete Panel Closure Documentation – Panels 1-7

G, H and K	
RCRA Permit Attachment C	**Documents:** • WP 02-EC1001(REV 19), Characterization, Sampling, Shipping, and Documentation • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Permit Reporting and Notifications Compliance Plan • WP 08-NT.12(REV 10), WIPP Transportation Program • WP 08-NT3020(REV 33), TRU Waste Receipt • WP 08-NT3020(REV 33), TRU Waste Receipt, Attachments 1-5 • WP 13-1(REV 44), Waste Isolation Pilot Plant Quality Assurance Program Description • WP 15-RM (REV 13), WIPP Records Management Program Plan • WP 15-RM3019(REV 0), WIPP Records Management **Completed Forms and Reports:** • DOE/WIPP-22-3526, WIPP Resource Conservation and Recovery Act Biennial Hazardous Waste Report • DOE/WIPP-24-3526, WIPP Resource Conservation and Recovery Act Biennial Hazardous Waste Report
RCRA Permit Attachment D	**Documents:** • WP 12-ER3907(REV 8), Operational Emergency Notifications • EA12ER3907-1-0(REV 2), Emergency Notification Form • EA12ER3907-2-0(REV 15), WIPP Emergency Notification Form Distribution and Verification • WP 12-ER.05(REV 6), WIPP Emergency Services Hazardous Material Response Guide • WP 12-ER4926(REV 13), CMR Expanded Staffing Operations • WP 12-ER4926-1-0(REV 20), CMR Expanded Staffing Checklist • EA12ER4926-7-0(REV 3), RCRA Contingency Plan Implementation Decision Checklist • EA12ER4926-8-0(REV 1), Notification of Implementation of the WIPP RCRA Contingency Plan • RCRA Permit Attachment D – RCRA Contingency Plan • RCRA Quick Reference Guide to the WIPP Facility RCRA Contingency Plan (REV 5) • WP 12-15(REV 7), WIPP Emergency Management Notification and Communications Plan • WP 12-ER3002(REV 37), Emergency Operations Center Operations • WP 12-ER.25(REV 8), Underground Escape and Evacuation Plan • EA12ER4926-1-0(REV 20), CMR Expanded Staffing Checklist • DOE/WIPP-17-3573(REV 5), WIPP Emergency Management Plan **Completed Forms and Reports:** • Report of Implementation of the Resource Conservation and Recovery Act Contingency Plan at the Waste Isolation Pilot Plant on April 9, 2022 • Report of Implementation of the Resource Conservation and Recovery Act Contingency Plan at the Waste Isolation Pilot Plant on August 23, 2022

	• Report of Implementation of the Resource Conservation and Recovery Act Contingency Plan at the Waste Isolation Pilot Plant on August 30, 2023
RCRA Permit Attachment E	**Documents:** • WP 05-WH1101(REV 37), CH Surface Transuranic Mixed Waste Handling Area Inspections • WP 05-WH1810(REV 24), Underground Transuranic Mixed Waste Disposal Area Inspections • WP 08-NT3020(REV 33), TRU Waste Receipt • WP 05-WH1101, Attachment 1(REV 37), CH Waste Processing Datasheet - Witnessed Process • EA05WH1101-3-0(REV 37), TRU Mixed Waste Decontamination Equipment Annual Inspection • WP 12-FP0025(REV 17), Annual Sprinkler System Inspection and Testing • WP 12-FP0026(REV 22), Weekly Surveillance for Fire Water Supply and Distribution System • WP 12-FP0028(REV 14), Fire Systems Inspection and Testing • WP 12-FP0034(REV 10), Fire Hydrant and Isolation Valve Inspection • WP 12-FP0060(REV 19), Semi-Annual Inspection and Test of Automatic Fire Suppression for Vehicles and Equipment Inspections • PM000011(REV 2), Panel Closure Bulkhead Inspection **Completed Forms and Reports:** • Bulkhead Inspections (randomly selected reports) • Emergency Diesel Generator Inspections (randomly selected reports) • Fire Protection Inspections (randomly selected reports) • WP 05-WH1101, Attachment 2(REV 37), Parking Area Unit and CH Container Storage Area Weekly Inspection (randomly selected reports) • EA05WH1101-2-0(REV 1), PAU and CH Container Storage and Inspection [HWFP TABLE E-1] (randomly selected reports) • Ventilation Inspections (randomly selected reports) **Photos:** • Photograph No. 7, 474A - Hazardous Waste Storage Area • Photograph No. 8, 474B - Non-Hazardous Waste and Infectious Waste Storage Area • Photograph No. 10, Used Oil and Used Anti-Freeze Storage Area • Photograph No. 12, Used Battery Storage Area • Photograph No. 13, Low-Level Waste Storage Area • Photograph No. 15, Mixed-Waste Staging Area • Photograph No. 20, Tool Crib Storage Area • Photograph No. 21, Universal Waste • Photograph No. 61, Signage of Controlled Gate • Photograph No. 63, Perimeter Fence with Sign Spacing • Photograph No. 68, Caution, Danger, and No Trespassing Signage

RCRA Permit Attachment F	**Documents:** • WP 14-TR.01, WIPP Training Program • GET-INT (REV 1), General Employee Training • HWO-101(REV 4), RCRA Regulations/Hazardous Waste Facility Permit Overview • HWP-101(REV 5), Permit Inspections/Recordkeeping • HWR-101(REV 6), Hazardous Waste Responder • HWS-101A(REV 9), Hazardous Waste Worker Supervisor • HWW-101(REV 9), Hazardous Waste Worker • SAF-645(REV 9), RCRA Contingency Plan **Completed Forms and Reports:** • Training Record Printouts for Selected Permit Related Employees
RCRA Permit Attachment N	**Documents:** • DOE/WIPP-99-2194(REV 15), Environmental Monitoring Plan • EA12VC1685-2-0, Subatmospheric Sampling Data Sheet • EA12VC3209-1-0, VOC Data Validation Checklist • EA12VC3209-2-0, Vacuum Comparison Between Field and Laboratory Receipt • EA12VC3209-3-0, Evaluation of Non-Target VOCs • WP 02-EM.02(REV 7), Integrated Sample Control Plan • WP 02-RC5000(REV 4), RCRA Operating Record Maintenance • WP 12-VC.01(REV 17), Volatile Organic Compound Monitoring Plan • WP 12-VC.02(REV 18), Quality Assurance Project Plan for VOC Monitoring • WP 12-VC1685 Attachment 2(REV 14), VOC Monitoring Program Chain-of-Custody Record • WP 12-VC1685(REV 14), Subatmospheric Air Sampling in Passivated Canisters • WP 12-VC3209(REV 23), VOC Monitoring Group – Data Handling and Program Reporting • WP 13-QA.03 (REV 37), Quality Assurance Independent Assessment Program • WP 15-RM (REV 13), WIPP Records Management Program Plan • WP 15-RM3019(REV 0), WIPP Records Management **Completed Forms and Reports:** • November 2023 Completeness Report • Semi-Annual Volatile Organic Compound Data Summary Reports for 2022 and 2023 **Photos**: • Photograph No. 83 --Disposal Room VOC Monitoring - Sampling Cabinet outside (active) Panel 8 • Photograph No. 84 -- Disposal Room VOC Monitoring - Sample Inlet Lines to Sampling Cabinet outside Panel 8 • Photograph No. 50 -- VOC Air Sampling Canister in place at Location VOC-D (Background location, outside protected area) • Photograph No. 72 -- Passivated Stainless Steel Sampling Canister in place for VOC sampling at location VOC-C (at west air intake for Bldg. 489)

	• Photograph No. 73 -- Passivated Stainless Steel Sampling Canisters ready for placement at VOC sampling locations VOC-C and VOC-D
RCRA Permit Attachment O	**Documents:** • WP 00CD-0001(REV 43), WIPP Mine Ventilation Plan • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Permit and Notifications Compliance Plan • WP 04-VU1612(REV 12), WIPP Mine Ventilation Rate Monitoring • WP 04-VU1614(REV 7), U/G Air Flow Volume Readings • WP 04-VU1615(REV 0), Abnormal Active Room Ventilation Flowrate Conditions & Implementing Measures • WP 04-VU2001(REV 14), Interim Ventilation System Operation • WP 04-VU3003(REV 3), Underground Ventilation System Testing and Balancing • WP 10-AD3028(REV 20), Calibration and Control of Measurement and Test Equipment • WP 10-AD3029(REV 18), Calibration and Control of Monitoring and Data Collection Equipment **Completed Forms and Reports:** • EA04AD3008-50-0, Facility Operations Operator Rounds Cover Sheet – 2022-2024 • Annual Mine Ventilation Rate Monitoring Reports for 2023 and 2024
Clean Air Act (CAA)	**Documents:** • WP 02-EC3801(REV 19), Environmental Compliance Review and NEPA Screening • WP 04-ED1301(REV 22), Diesel Generator Operation (for standby DG-1 and DG-2) • EA02EC3801-1-0(REV 14), Environmental Compliance Review Form • EA04AD3008-47-0(REV 5), Facility Operations Diesel Generator Log sheet (for DG-1 and DG-2) • NMED Air Quality Bureau #0310-M-2 Diesel Generator Permit **Completed Forms and Reports:** • NMED AQB Acknowledgement of Receipt of Demolition Notification for WIPP Bldg. 242, dated 5/12/2023 • NMED Asbestos NESHAP (Demolition) Notification for WIPP Bldg. 242, dated 5/09/2023 • WIPP Annual Site Environmental Report for 2022 (9/29/23) • WIPP Annual Site Environmental Report for 2023 (9/29/24) • DOE/WIPP-22-3526, WIPP Biennial Environmental Compliance Report, October 2022 • DOE/WIPP-24-3526, WIPP Biennial Environmental Compliance Report, October 2024 • Selected Facility Operations Diesel Generator Log sheets (DG-1 and DG-2) for 2022 and 2023 **Photos**: • Photograph No. 77, Main Standby Diesel Generators DG-1 & DG-2

Clean Water Act (CWA)/DP-831	**Documents:** • WIPP Discharge Permit 831 • WP 02-2(REV 5), WIPP Discharge Permit 831 Monitoring and Maintenance Plan • WP 02-EC1003(REV 15), Low-Flow Groundwater Purging and Sampling • WP 02-EC3003(REV 5), DP-831 Semi-Annual Report Preparation • WP 02-EM1001(REV 23), Facultative Lagoon System, H19, and Infiltration Control Impoundments Sampling • WP 02-EM1014(REV 14), Groundwater Level Measurement • WP 02-EM1022(REV 15), Site Discharge Area Inspections • WP 02-EM3001(REV 30), Administrative Processes for Environmental Monitoring and Hydrology • WP 02-RC.17(REV 2), DP-831 Contingency Plan • WP 04-AD3008(REV 20), Preparation and Use of Round Sheets, Surveillance Data Sheets and Critical Component/Equipment Status Sheets • WP 10-WC3011(REV 54,) Work Control Process **Completed Forms and Reports:** • DP-831 Semi-Annual Discharge Monitoring Reports for 2022, 2023, and 2024 • EA04AD3008-31-0(REV 12), Facility Operations Facultative Sewage Lagoons, Industrial Wastewater and Stormwater Ponds Round Sheets • WP 02-EM1022, Attachment 1(REV 12), Site Discharge Area Pond Inspections **Photos:** • Photograph No. 36, Salt Storage Pond 2 • Photograph No. 37, Salt Storage Pond 3 • Photograph No. 38, Salt Storage Pond 1 • Photograph No. 40, Salt Storage Pond 5 • Photograph No. 46, Example of Required Signage • Photograph No. 47, Evaporation Pond H-19 • Photograph No. 55, Salt Storage Pond 4 • Photograph No. 61A, Stormwater Pond 2 • Photograph No. 62, Stormwater Pond 1 • Photograph No. 65, Stormwater Pond 3 • Photograph No. 69, Facultative Lagoon System • Photograph No. 70, Facultative Lagoon System Signage Example
New Mexico Solid Waste Act (NMSWA)	**Documents:** • WP 02-EC1001(REV 19), Characterization, Sampling, Shipping, and Documentation • WP 02-RC.01(REV 14), Hazardous and Universal Waste Management Program • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Permit Reporting and Notification Compliance Plan • WP 04-CO.01(REV 8), Conduct of Operations Program Description

	• WP 05-WH.04(REV 7), WIPP Waste Handling Operations Training Program Plan • WP 08-NT.12(REV 10), WIPP Transportation Program • WP 12-IH.02-3(REV 8), WIPP Industrial Hygiene Program – Hazardous Waste Operations and Emergency Response • WP 02-PC3002(REV 15), WIPP Hazardous Waste Facility Permit Change Request and Modification Processing • WP 02-RC3109(REV 16), Waste Accumulation Area Inspections • WP 08-NT3020(REV 33), TRU Waste Receipt • WP 02-EC3506(REV 12), Environmental Incident Reporting • WP 12-ER.05(REV 6), WIPP Emergency Services Hazardous Material Response Guide • WP 12-ER4926(REV 13), CMR Expanded Staffing Operations • WP 12-11(REV 9), Development and Maintenance of the Emergency Planning Hazards Survey **Completed Forms and Reports:** • Hazardous Waste Manifest Records for 2022, 2023, and 2024 • Weekly Inspection Record for 90-day Accumulation Area • Weekly Inspection Record for Low-Level Waste Storage • Weekly Inspection Record for Satellite Accumulation Area • Weekly Inspection Record for Universal Waste – Surface and Underground **Photos:** • Photograph No. 7, 474A - Hazardous Waste Storage Area • Photograph No. 8, 474B - Non-Hazardous Waste and Infectious Waste Storage Area • Photograph No. 10, Used Oil and Used Anti-Freeze Storage Area • Photograph No. 12, Used Battery Storage Area • Photograph No. 13, Low-Level Waste Storage Area • Photograph No. 15, Mixed-Waste Staging Area • Photograph No. 20, Tool Crib Storage Area – Universal Waste • Photograph No. 21, Universal Waste
Emergency Planning and Community Right to Know Act (EPCRA)	**Documents:** • DOE/WIPP-17-3573 (REV 5), Emergency Management Plan • WP 02-EC3506 (REV 12), Environmental Incident Reporting • WP 12-RP.01 (REV 11), WIPP Emergency Planning Hazards Survey • WP 12-11 (REV 9), Development and Maintenance of the Emergency Planning Hazards Survey • WP 15-CA1010 (REV 4), Occurrence Reporting and Processing • WP 12-ER4925 (REV 17), CMR Incident Recognition and Initial Response • WP 12-ER4926 (REV 13), CMR Expanded Staffing Operations • EA12ER4926-1-0 (REV 20), CMR Expanded Staffing Checklist • EA12ER4926-5-0 (REV 2), Environmental Release Worksheet • DOE WIPP-08-3378 (Rev 7), Emergency Planning Hazards Assessment • WP 02-EC3005 (REV 3), SARA Tier II Emergency and Hazardous Chemical Inventory Reporting • WP 12-ER3906 (REV 31), Categorization and Classification

	Completed Forms and Reports: • Superfund Amendments and Reauthorization Act (SARA) Tier II Emergency and Hazardous Chemical Inventory Reports for CY 2022, 2023 and 2024
Toxic Substances Control Act (TSCA)	**Documents:** • U.S. EPA Region 6 Reauthorization Approval of Storage and Disposal of Non-Liquid Polychlorinated Biphenyls (PCBs) Contaminated with Transuranic Waste (PCB/TRU) and PCB/TRU Waste Mixed with Hazardous Waste at the WIPP, 4-11-2024 • WP 08-NT3020(REV 33), TRU Waste Receipt • WP 05-WH1011(REV 70), CH Waste Processing • WP 05-WH1015(REV 48), Preparation of CH Packaging for Empty Shipment • WP 02-RC5000(REV 4), RCRA Operating Record Maintenance **Completed Forms Reports:** • WP 05-WH1101(REV 37), CH Surface Transuranic Mixed Waste Handling Area Inspections • WP 05-WH1011, Attachment 1(REV 70), CH Waste Processing Data Sheet • WP 05-WH1015, Attachment 1(REV 48), Empty CH Packaging Data Sheet • 2022-11-22 NMED Hazardous Waste Bureau PAU Extension of Storage Time Approval, 2022 • WP 05-WH1011, Attachment 1(REV 70), CH Waste Processing Data Sheet, completed 4/9/25 • WP 05-WH1015, Attachment 1(REV 48), Empty CH Packaging Data Sheet, completed 4/9/25 • WP 05-WH1101(REV 37), CH Surface Transuranic Mixed Waste Handling Area Inspections (randomly selected) • 21-0243 DOE Notification to NMED of Surge Storage • 22-0247 – 2022 CH Bay Surge Storage Summary Report Letter and Summary • WP 15-RM, WIPP Records Management Program Plan • Letter notifying NMED and USEPA of intent to close Panels 1-2, Panels 3-6 and Panel 7 • Closure documentation submitted to NMED for Panels 1-2 and approved by NMED • Request for extension of time for submittal of closure documentation for Panels 3-6 • NMED approval of time extension for submittal of documentation for Panels 3-6 • Closure documentation submitted to NMED for Panels 3-6 and approved by NMED • Request for extension of time for submittal of closure documentation for Panel 7 • NMED approval of time extension for submittal of documentation for Panel 7 • Closure documentation submitted to NMED for Panel 7 and approved by NMED **Photos:** • Photograph No. 16, As-Received TRUPACTs in PAU • Photograph No. 18, As-Received TRUPACTs in PAU Storage Shed

	• Photograph No. 23, CH Bay Waste Drums in Designated Area • Photograph No. 24, CH Bay Waste Drums on Pallets with Proper Spacing
National Environmental Policy Act (NEPA)	**Documents:** • WP 02-EC.08(REV 14), National Environmental Policy Act Compliance Plan • WP 02-EC3801(REV 19), Environmental Compliance Review and NEPA Screening • DOE/WIPP-93-004, Waste Isolation Pilot Plant Land Management Plan • EA02EC3801-1-0(REV 14), Environmental Compliance Review (ECR) Form **Completed Forms and Reports:** • DOE/WIPP-24-3591, WIPP Annual Site Environmental Report for 2023 • EA02EC3801-1-0(REV 14), Environmental Compliance Review (ECR) Forms (randomly selected)
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	**Documents:** • WP 12-IH.02-4(REV 4), WIPP Industrial Hygiene Program—Hazard Communication and Hazardous Materials Management Plan • WP 02-EC3506(REV 12), Environmental Incident Reporting • WP 02-PC.03(REV 13), WIPP Hazardous Waste Facility Permit Reporting and Notifications Compliance Plan **Completed Forms and Reports:** • EA12IH02-4-2-0, Site Hazardous Material Quarterly Inventory Report (4Q 2024) • DOE/WIPP-24-3526, WIPP Biennial Environmental Compliance Report, April 1, 2022 through March 31, 2024 • DOE/WIPP-22-3526, WIPP Biennial Environmental Compliance Report, April 1, 2020 through March 31, 2022
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)	**Supporting Documents:** • PO DOE23-PO522658 (4/11/2024), including SOW 22-115 (11/14/2023)

6.2 Interviews

The Review Team interviewed the following personnel during the on-site portion of the Triennial Review:

Table 2 - Interviews

Criteria Area	Interviewees
RCRA Permit Part 1	Rick Chavez, SIMCO Environmental Program Manager Jeff Runyon, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance Bill Jaco, LATA Site Environmental Compliance Emory Flores, LATA Site Environmental Compliance Bobby St. John, External Communications Manager

RCRA Permit Part 2	Angela Johnson, Transportation Management Manager Cody Arterburn, WIPP Protective Services Performance Assurance Manager Bill Jaco, LATA Site Environmental Compliance Jason Huber, Waste Handling Operations Manager Cindy Woodin, Operations Service Support Helen Moore, LATA NESHAPS & RCRA/Technical Support Rick Chavez, SIMCO Environmental Program Manager Jeff Runyon, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance Marcus Ingram, CH Waste Operations Manager Daniel Wade, Central Characterization Manager Shalaine Britain, Emergency Management Manager Robert Nieman, Transportation Specialist
RCRA Permit Part 3	Angela Johnson, Transportation Management Manager Bill Jaco, LATA Site Environmental Compliance Jeff Runyon, LATA Site Environmental Compliance Jason Huber, Waste Handling Operations Manager Marcus Ingram, CH Waste Operations Manager Anthony Alanzo, Waste Handling Engineer/Supervisor Shawn Salazar, Waste Handling Engineer/Supervisor Bryan Heras, Operations Readiness Startup
RCRA Permit Part 4	Rick Chavez, SIMCO Environmental Program Manager Daniel Janish, Engineering Rudy Olivo, Underground Facility Operations Manager Bryan Heras, Operations Readiness Startup Isaac Pena, Ventilation Engineering Manager Christopher Dominguez, Geotechnical Engineering Supervisor Kristi Moore, Engineering Services Cindy Woodin, Operations Service Support
RCRA Permit Part 5	David Ganaway, Environmental Monitoring and Hydrology Program Manager John Thurston, Groundwater Monitoring and Hydrogeology (Lead)
RCRA Permit Parts 6-8	Rick Chavez, SIMCO Environmental Program Manager Jeff Runyon, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance Bryan Heras, Operations Readiness Startup
RCRA Permit Attachment C	Michael Jones, SIMCO Permitting and RCRA Compliance Angela Johnson, Transportation Management Manager Robert Nieman, Transportation Specialist Jason Huber, Waste Handling Operations Manager Marcus Ingram, CH Waste Operations Manager
RCRA Permit Attachment D	Mark Lunsford, LATA Site Environmental Compliance Manager Michael Jones, SIMCO Permitting and RCRA Compliance John Sanford, SIMCO Emergency Preparedness Manager Shalaine Britain, Emergency Management Manager Marcus Ingram, CH Waste Operations Manager
RCRA Permit Attachment E	Rick Chavez, SIMCO Environmental Program Manager Jeff Runyon, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance

	Anthony Alanzo, Waste Handling Engineer/Supervisor Shawn Salazar, Waste Handling Engineer/Supervisor Bryan Heras, Operations Readiness Startup Jason Huber, Waste Handling Operations Manager Rudy Olivo, Underground Facility Operations Manager Michael Frye, Fire Protection Engineering Supervisor Cindy Woodin, Operations Service Support
RCRA Permit Attachment F	Brand Gracey, Training and Procedures Manager Bryan Heras, Operations Readiness Startup Rick Chavez, SIMCO Environmental Program Manager Michael Jones, SIMCO Permitting and RCRA Compliance
RCRA Permit Attachments G, H and K	Rick Chavez, SIMCO Environmental Program Manager Jeff Runyon, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance
RCRA Permit Attachment L	David Ganaway, Environmental Monitoring and Hydrology Program Manager John Thurston, Groundwater Monitoring and Hydrogeology (Lead) Pam Akakpo, Groundwater Monitoring & Hydrogeology
RCRA Permit Attachment N	Dave Ganaway, Environmental Monitoring and Hydrology Program Manager Kristy Morrison, VOC Monitoring Program Lead
RCRA Permit Attachment O	Bryan Heras, Operations Readiness Startup Christopher Dominguez, Geotechnical Engineering Supervisor
Clean Air Act (CAA)	Bill Jaco, LATA Site Environmental Compliance Cassie Marrs, LATA NESHAPS & RCRA/Technical Support Program Lead
Clean Water Act (CWA)/DP-831	Bill Jaco, LATA Site Environmental Compliance Rick Salness, SIMCO Site Environmental Program Manager David Ganaway, Environmental Monitoring and Hydrology Program Manager John Thurston, Groundwater Monitoring and Hydrogeology (Lead)
New Mexico Solid Waste Act (NMSWA)	Bill Jaco, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance Robert Nieman, Transportation Specialist Emory Flores, LATA Site Environmental Compliance Faye Huber, Medical Services
National Environmental Policy Act (NEPA)	Mark Lunsford, LATA Site Environmental Compliance Manager
Emergency Planning and Community Right to Know Act (EPCRA)	Bill Jaco, LATA Site Environmental Compliance
Toxic Substances Control Act (TSCA)	Rick Chavez, SIMCO Environmental Program Manager Anthony Alanzo, Waste Handling Engineer/Supervisor Shawn Salazar, Waste Handling Engineer/Supervisor Angela Johnson, Transportation Management Manager Bryan Heras, Operations Readiness Startup Jason Huber, Waste Handling Operations Manager Jeff Runyon, LATA Site Environmental Compliance Michael Jones, SIMCO Permitting and RCRA Compliance

	Cindy Woodin, Operations Service Support
National Environmental Policy Act (NEPA)	Mark Lunsford, LATA Site Environmental Compliance Manager
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	Mark Lunsford, LATA Site Environmental Compliance Manager
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)	Melissa Harris, Site Services Deputy Manager, Subcontract Technical Representatives (Facility Ops) Tim Walling, Buyer, Operations Procurement/Subcontracts

6.3 Inspections/Observations

The Review Team performed the following inspections/observations during the on-site portion of the Triennial Review:

Table 3 – Inspections/Observations

Criteria Area	Inspections/Observations
RCRA Permit Part 1	5/10/25 – Surface Satellite Accumulation Area walk-down 5/8/25 – Central and Universal Waste Accumulation Area walk-down 5/9/25 – Underground Satellite Accumulation Area walk-down
RCRA Permit Part 2	5/8-9/25 – Waste Handling Building walk-down
RCRA Permit Part 3	5/8/25 – Waste Handling Building walk-down/Parking Area Unit walk-down, Underground Tour
RCRA Permit Part 4	5/9/25 – Underground Tour
RCRA Permit Part 5 & Attachment L	5/10/25 – Performed walk-down with SIMCO staff of stormwater ponds (SWP), salt storage ponds (SSP) and the facultative lagoons 5/15/25 – Observed groundwater monitoring stabilization and calibration activities
RCRA Permit Attachment E	5/8-9/25 – Waste Handling Building walk-down 5/9/25 Underground Tour 5/9/25 – Underground Satellite Accumulation Area walk-down 5/14/25 – Surface Fire Systems walk-down
RCRA Permit Attachment N	4/15/25 – Observed sampling at both (surface) Repository VOC sampling stations, VOC-C and VOC-D
Clean Air Act (CAA)	5/8-9/25 – Waste Handling Building walk-down
Clean Water Act (CWA)/DP-831	5/10/25 – Performed walk-down with SIMCO staff of stormwater ponds (SWP), salt storage ponds (SSP) and the facultative lagoons
Toxic Substances Control Act (TSCA)	5/8/25 – Waste Handling Building WHB walk-down/Parking Area Unit walk-down/Underground Tour
New Mexico Solid Waste Act (NMSWA)	5/10/25 – Surface Satellite Accumulation Area walk-down 5/8/25 – Central and Universal Waste Accumulation Area walk-down

7. FINDINGS, OBSERVATIONS AND RECOMMENDATIONS

This section documents issues identified by the Review Team that fall into the following categories: 1) non-compliances (potential violations); 2) findings (deficiencies that could lead to non-compliances of applicable regulations); or, 3) observations (areas of improvement and/or vulnerabilities). For the purposes of this Report, the Review Team has also listed recommendations for SIMCO's consideration.

Non-Compliances and Observations

In addition to the review of SIMCO compliance with requirements relevant to the Third Triennial Review, the Review Team also revisited the seven Observations identified during the Second Triennial Review and one Observation identified during the First Triennial Review.

The Team did not identify any Non-Compliances for this Third Triennial Review, however there were Observations that have been identified. The Review Team verbally communicated the Observations to SIMCO during the On-site Close-out Meeting held on April 15, 2025, and these are detailed below along with the Team's recommendations that relate to the Observations:

Observation 1 - Need for Additional Assurance that Permitted Waste Volumes and Hold Times in the Waste Handling Building (WHB) and Parking Area Unit (PAU) are Not Exceeded.

Introduction

During the First Triennial Review, an on-site inspection resulted in an Observation/ Recommendation related to the subject regulatory commitments in the EPA Conditions of Approval and the Permit. No changes made as a result of that Observation/ Recommendation were identified in this Review. While the Review Team did not identify any cases where Permit requirements were not met, concerns remain related to the reliance on the diligence and attention to detail required of the WIPP Waste Management and Transportation staff to "move" Contact Handled (CH) Transuranic (TRU) waste packages, from receipt through downloading in what the Team perceived as an unnecessarily manual data management system. There is also a concern related to the start date as assigned to a waste package for the purpose of complying with a permitted maximum time in storage for the WHB.

While there was a concern identified during the Review, the Review Team found that the current system of utilizing two independent groups (Waste Operations and Transportation Management) to track the movement of TRU mixed waste through the process has mitigated that risk and has worked successfully since the opening of the WIPP facility.

Related to the start date assigned to waste packages entering the WHB, the Review Team, through interviews and inspections conducted during performance of the onsite portion of the Review, gained an understanding of the current process for waste receipt and tracking and the WIPP facility's position on the subject. The Permit does not describe or state that

the WHB storage time frame starts when the TRUPACT is vented, but rather the Permit identifies that the maximum storage time in the WHB Unit shall not exceed 60 calendar days (with the exception of Site Derived Waste storage). The WHB storage time is interpreted to begin when a TRUPACT is brought into the WHB Unit and placed into a TRUDOCK position. SIMCO confirmed this interpretation of the WHB Unit storage start time with a Waste Handling Engineer and the CH Waste Operations Manager.

The EPA Conditions of Approval, Section III A 1-2, PCB/TRU Waste Storage, Authorized Storage Areas, also defines the maximum quantities of PCB/TRU waste that may be stored in the WHB and PAU at any time. The storage time limits identified in the EPA Conditions of Approval Section D, *General PCB/TRU Storage Requirements* match the storage time limits in the Permit.

Observation Description

SIMCO's current practice is to review the CH Waste Operations Tailored Shift Briefing report at the beginning of each shift, which includes the status by shipment and TRUPACT identifying location (e.g., PAU, WHB, enroute) and associated waste volumes. Storage location and volume are also tracked daily by Waste Handling Operations using procedure WP 05-WH1101. TRUPACTs in the Parking Area Unit and those that are enroute are tracked daily by the Transportation Management organization using procedure WP 08-NT3020.

For the WHB, the current WIPP facility approach is to physically limit storage of PCB/TRU waste containers either in the TRUDOCKs area or on facility pallets. The maximum number of facility pallets is identified and tracked procedurally for approved storage locations, ensuring that the Permitted storage limit is not exceeded prior to unloading additional waste.

For the PAU, at the beginning of each shift, the amount of waste stored in the PAU is calculated and both Waste Handling Operations and Transportation Management independently verify the amount of TRU mixed waste in the PAU. If the inventory is close to the Permitted storage capacity, shipments of TRU mixed waste from the Generator Sites may be temporarily stopped in accordance with Permit Attachment A1, Section A1-1d, *Container Management Practices*.

The Review Team feels that, while this system works, it relies on procedural adherence and the experience of the workers in both Waste Handling Operations and Transportation Management to assure that waste is not received during the shift before Permitted storage space is available. Under certain conditions, the Permit allows the use of Parking Area Unit surge storage when the maximum capacity in the Parking Area Unit has been reached. However, in those conditions, the Permittees must notify the NMED in writing and provide justification for the use of the PAU surge storage prior to receiving the waste.

WP 04-CM2005, *Logkeeping*, identifies information to be recorded for waste handling operations including the release, movement, processing, and downloading of waste. Waste

Handling Operations enters this information into the CMR daily log. The log information can be matched with information recorded on Attachment 1, *CH Waste Processing Data Sheet* of WP 05-WH1011 and Attachment 1, *CH Downloading and Emplacement Data Sheet* of WP 05-WH1025. Waste Operations developed the WP 15-GM.21, *WIPP Handling Roles, Responsibilities, Accountability, and Authority* procedure, which identifies in Section 5.4, *Waste Handling Engineer (WHE)* that the WHE is to ensure the Waste Handling logs are current and reviewed for accuracy.

Review Team Recommendations

Based on the Review Team's experience with operations of commercial treatment storage and disposal facilities (TSDFs), the current approach for assuring that Permitted waste volume and time limits are not exceeded could be improved. The Team recommends an automated approach that would both provide documentation of compliance and easier management of waste movements. Additionally, the Review Team recommends evaluation of a less cumbersome method for verifying the date when a TRUPACT container is transferred to establish the start date/time assigned to each shipping container once transferred from the PAU to the WHB.

In discussions during the First WIPP Triennial Review, WIPP personnel who manage the WDS identified a report that they felt could be used to develop a relatively simple system for checking waste movements. Before moving waste, the package and movement information would be entered into the program. The program would then check resulting waste volumes against defined limits and indicate 'yes' or 'no', thus eliminating subjectivity from the process.

Finally, the Review Team recommends that the WIPP facility evaluate incorporation of an automated identification recognition system, such as the use of QR (Quick Response) codes or RFID's (Radio Frequency Identification) tags, applied to the disposal packages (container or multi-drum) within a TRUPACT, as well as the TRUPACT itself. Those devices could be applied to the inner container(s) by the Generator site during TRUPACT loading and to the TRUPACT prior to shipment to WIPP and would become part of the manifest documentation. Attention should be paid to placement and protection of the selected devices to prevent damage from handling or the environment.

Observation 2 - RCRA Operating Record (ROR)

Introduction

The WIPP Hazardous Waste Facility Permit Part 2, Section 2.14 states *"The Permittees shall maintain a written operating record at the facility, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(a)). The written operating record shall include all information required under 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)) subject to the limitations of storage of classified information as discussed in Permit Attachment C. Unless specifically prohibited by this Permit, an electronic record that cannot be altered by the user and capable of producing a paper copy shall be deemed to be a written record.*

The Permittees shall maintain the operating record until closure of the facility". Throughout the Permit, records that must be maintained as part of the RCRA Operating Record (ROR) are listed.

In reviewing compliance with the RCRA Permit requirements, the Review Team evaluated the ROR List maintained as an implementation tool and interviewed facility personnel. The Review Team found that the understanding of the ROR among site personnel, including document control personnel, was inconsistent in some cases.

Observation Description

There are basically two general types of records generated at the WIPP facility that are subject to the Permit ROR requirements, which are waste processing/training records and inspections/pre-operational checklists/monitoring. Waste processing, training and other similar records are generated electronically and are less of a concern within this observation. However, when discussing the process for transmittal and tracking of inspections and pre-operational checklists from the performing organization to Document Services Control/Maintenance Work Control (i.e., Document Control), it was determined that there is not, at least in some cases, a formal way for Document Control to confirm that they had received all the records required to be maintained in the ROR. These records are considered lifetime records in their Records Inventory and Disposition System (RIDS). Each SIMCO organization has a Records Administrator responsible for ensuring maintenance of applicable records.

The Review Team also found that the ROR List lacks specificity in relation to the records to be maintained. Each site procedure identifies the records generated in its implementation that are required to be included in the ROR, but the ROR List does not include all of the records identified in the procedures. The Review Team did not evaluate organizational RIDS for inclusion of Permit required records.

Finally, Procedure WP 02-RC5000 states that detailed information on the contents of the ROR could be found on the RES/LATA website. While the WIPP Central location of the ROR List had been updated to "Los Alamos Technical Associates or LATA", the WP 02-RC5000 procedure needs to be updated to complete correction of this issue.

Review Team Recommendations

The Team recommends the use of more detailed and formal communication of ROR requirements (e.g., a procedure or desk top instruction) for relevant WIPP employees. The Team also recommends that some process and/or cognizant regulatory managers should ensure that documents required to be maintained in the ROR are transmitted to the responsible document control representative for their area. The Review Team recommends that a more detailed information session (i.e., training) be developed for those WIPP personnel responsible for collecting and maintaining records required for the ROR. This training should include the definition of applicable records in their area of responsibility along with transmittal, storage and retention requirements for those records.

While conducting the Review, the Review Team, through interviews and documents, gained an understanding of the current ROR management process. Under current SIMCO management, regulatory responsibilities between SIMCO and LATA have changed from management of RES/LATA under the previous NWP prime contract. The Review Team recommends that the entire management of the ROR be evaluated and, at a minimum, that the ROR List be moved to and managed within the SIMCO records management program. Further, procedure WP 02-RC5000, and any other impacted plans/procedures, should be revised to reflect the current organization. The Team recommends that SIMCO develop a process for tracking the records that are required to be maintained under the ROR from the point of generation to receipt by the specified Document Control personnel and, ultimately, to the record storage location to assure that records are being obtained and managed in compliance with Permit requirements.

In the Team's opinion, the current definition of the ROR List lacks sufficient detail to adequately assure record retention requirements listed in the Permit. Ideally, the ROR List should be revised to incorporate that detail. If there are reasons that the level of detail in the ROR List needs to be more general, the Team recommends that a separate, more detailed list of documents (e.g., with storage type, location and length of retention) be developed and cross-walked to the ROR List. A global search of all site programs and procedures to identify the records required to be included in the ROR would produce a comprehensive list of such records, which could be used to verify the completeness of the ROR List.

During the performance of the Review, the Team identified three additional Observations and made recommendations to address them. SIMCO has provided specific evidence that those Observations had been adequately addressed and, as a result, they are not included in this Final Report.

8. CONCLUSION

The Review Team concluded that, overall, the Permittees have done an outstanding job of maintaining compliance in the regulatory areas evaluated as part of this Review. The Review Team evaluated 621 individual criteria across nine different regulatory areas that included document reviews and interviews with WIPP facility personnel. Two observations were identified as areas where improvements can be made to mitigate or eliminate areas of risk/vulnerability. The observations, while not required to be implemented by SIMCO, can be addressed by either implementing the Review Team's recommendations or by implementing solutions SIMCO develops.

Attachment A

WIPP Third Triennial Review Plan

WIPP THIRD TRIENNIAL REVIEW PLAN
SUBCONTRACT DOE23-PO523986

Third Triennial Review Plan Submitted:	December 20, 2024
Submitted By:	Renee Echols, Program Manager, Firewater Associates, LLC
SIMCO Point of Contact:	Michael Jones, Subcontract Technical Rep

Table of Contents

1. PURPOSE

The purpose of this Review Plan (Plan) is to provide guidance and direction to the Firewater Triennial Review Team for performance of the Third Triennial Review of the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) environmental programs. Performance of the Triennial Review is intended to ensure the Permittees [DOE Carlsbad Field Office (CBFO) and Salado Mining Contractors LLC (SIMCO)] regulatory deficiencies are identified with regard to the applicable regulations in areas that have been selected for review. The Third Triennial Review will utilize similar processes and personnel that resulted in successful completion of the First and Second Triennial Reviews in 2018 and 2021, respectively. These independent reviews are required to be funded and performed by DOE approximately every three years to determine the integrity of the environmental regulatory compliance processes and operations programs implemented at the WIPP facility.

2. INTRODUCTION

Firewater Associates, LLC (Firewater) and our teaming Subcontractor Longenecker & Associates (L&A) have developed this Plan in accordance with the requirements of SIMCO Subcontract DOE23-PO523986 and the Statement of Work (SOW) dated August 2024, Revision 0. The review will be carried out by knowledgeable professionals using industry approved audit techniques, consensus standards and familiarity with applicable environmental regulations in accordance with the requirements of the referenced Subcontract (Review Team).

This Plan provides the flow-down requirements from the First and Second Triennial Review Scopes of Work and Guidelines as the primary technical document to incorporate into the Third Triennial Review. The First Triennial Review SOW and Guidelines from the Settlement Agreement and Stipulated Final Order No. HWB-14-21 Supplemental Environmental Projects Paragraph 34(a), as amended by the Permittees and approved by the New Mexico Environment Department (NMED) on January 20, 2017. The Second Triennial Review Scope of Work and Guidelines were submitted to the NMED an approved by NMED on April 6, 2021. This Third Triennial Review activities have been initiated in calendar year 2024, and will be finalized in calendar year 2025. The final report will be submitted to SIMCO by June 28, 2025, and subsequently submitted by SIMCO to NMED within five days for public posting in the information repository.

3. REVIEW OBJECTIVES

The Third Triennial Review (Review) will be a systematic, independent, and documented process of objectively obtaining and evaluating evidence to determine whether specified environmental regulatory and operations requirements at the WIPP facility are being met. This Review will build upon the work performed on the First and Second Triennial Reviews that were completed in 2018 and 2021, respectively.

The objective of the Third Triennial Review is to determine whether specified environmental regulatory requirements within the designated areas are being properly implemented at the WIPP facility. In those areas, the Review's main goal is to identify potential regulatory deficiencies, potential regulatory violations, and deficiencies that could lead to violations of environmental regulations. Secondary objectives of the Review may also include the challenges regarding effective implementation of the

environmental programs at the WIPP facility and the strengths that reflect the maturity of those programs.

4. REVIEW CRITERIA

The Review Team will develop review criteria that will be used to evaluate WIPP facility environmental regulatory programs compliance. The criteria will include regulatory requirements, standards, guidelines, permit conditions, or any other specified requirements. Reference documents will include relevant permits, licenses, authorization, and similar documents that authorize work activities.

The Review Team will qualitatively identify current and future vulnerabilities and risks in the identified areas so that SIMCO can address and mitigate immediate risks as well as understand the potential and likelihood for future risks. The Review Team will deploy effective, consistent, and thorough review methods to provide smooth transition to any future Triennial Review.

5. REVIEW SCOPE

The Review will focus on the following environmental statutes, regulations, and Orders, to the extent they apply to the WIPP facility, as required in the SOW:

Table 1 – Environmental Regulations*

Item	Applicable Environmental Statute or	Focus of the Review
1	**Resource Conservation and Recovery Act (RCRA)** (and New Mexico implementation through the **HWA**)	Processes and procedures to assure compliance to the operational requirements and compliance to requirements for the accumulation and retention of records and monitoring data. Corrective actions taken to prevent the recurrence of non-compliances. Development of new reports/notifications resulting from the renewal Permit that became effective on November 3, 2023.
2	**Clean Air Act (CAA)** (including the **National Emission Standards for Hazardous Air Pollutants (NESHAPs)** and the **New Mexico Air Quality Act)**	Processes and procedures to assure compliance and the accumulation of required monitoring data
3	**Clean Water Act (CWA)** (and the **New Mexico Water Quality Act**)	Processes for controlling permitted discharges and the collection of monitoring data for reporting to the NMED.
4	**New Mexico Solid Waste Act**	Procedures for implementation and the reporting requirements
5	**Emergency Planning and Community Right to Know Act (EPCRA)** (and the **New Mexico Hazardous Chemicals**	Processes for reporting spills and the processes to accumulate and report the required information annually.
6	**Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval**	Processes and procedures to assure compliance to the operational requirements and compliance to the requirements for the accumulation and retention of records and monitoring data.
7	**National Environmental Policy Act (NEPA)**	Procedures for identifying decisions that require NEPA review and the process for conducting the review.
8	**Comprehensive Environmental Response, Compensation, and**	Processes for determining reportable quantities.
9	**Federal Insecticide, Fungicide, and Rodenticide Act** (and the **New Mexico Pesticide Control Act**)	Assure only licensed applicators are used at WIPP Project facilities.

- Additionally, the scope may include the continued effectiveness of corrective actions taken to address findings/observations that resulted from previous WIPP Triennial Reviews.

The activities to be performed by the Review Team will include:

- Determine, through investigation, examination of records, and interviews, if the CBFO and SIMCO are in compliance with the terms and conditions of permits and authorizations implementing the environmental regulations that stem from the listed statutes. Review Team members reviewing SIMCO Security records and procedures shall comply with the requirements of DOE Order 470.4B, *Safeguards and Security Program,* Attachment 2, *Contractor Requirements Document Safeguards and Security Program Planning*.

- Determine, through investigation, examination of records, and interviews, if the CBFO and SIMCO have programs in place to identify and implement new environmental requirements when they are promulgated.

- Determine through investigation, examination of records, and interviews, the robustness of the oversight process(es) in place for the environmental programs at the WIPP facility to assure the technical content of the implantation programs is effectively controlled.

- Document findings in a written report that will be submitted to the Permittees through the SIMCO Point of Contact (POC) at the end of the review. All findings relating to SIMCO Security shall be submitted to the SIMCO Security Manager for review and approval before publication or release. Upon discovery of a potential SIMCO Security finding, the Reviewer must immediately notify the SIMCO Security Manager.

- Perform the portions of the Triennial Review that apply to SIMCO Security as outlined in DOE Order 470.4B, Attachment 2, Section 2, as it pertains to the Permit.

- Provide guidance and support, as needed, to address/close findings and recommendations identified during the Triennial Review.

6. THIRD TRIENNIAL REVIEW TEAM

6.1 Personnel and Qualifications

The Third Triennial Review Team is comprised of seven team members from two contractors - Firewater Associates, LLC (Firewater) and Longenecker & Associates (L&A). Resumes for each Team member have been provided to SIMCO. All Team personnel have significant experience with DOE requirements and specifically those of WIPP. The Review Team will operate under the direction of the SIMCO Point of Contact (POC), Michael Jones. The team organization chart is provided below:

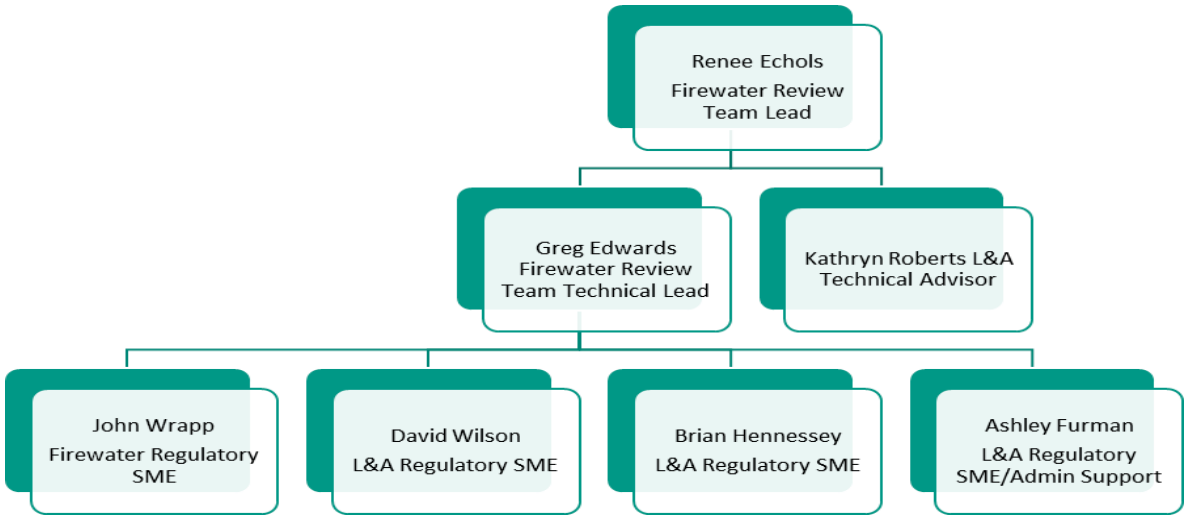

Exhibit 2 Firewater Review Team Organization Chart

The Review Team members and their contact information are as follows:

Team Member	Affiliation	Email	Phone
Renee Echols	Firewater Associates, LLC Program Manager	rechols@firewaterllc.com	(865) 599-4064
Gregory Edwards	Firewater Associates, LLC SME II	gedwardstn@aol.com	(865) 368-3000
John Wrapp	Firewater Associates, LLC SME II	wrappjohn@aol.com	(865) 250-0731
Kathryn Roberts	Longenecker & Associates SME II	kroberts@la-inc.com	(505) 603-9216
David Wilson	Longenecker & Associates SME II	dwilson@la-inc.com	(803) 730-1678
Brian Hennessey	Longenecker & Associates SME II	Henten2017@gmail.com	(803) 646-9696
Ashley Furman	Longenecker & Associates Engineering Apprentice	ameyer@la-inc.com	(919) 888-1991

Review Team members possess the following capabilities:

- The necessary knowledge and skills to apply auditing principles, procedures, and techniques for undertaking compliance audits.
- The knowledge and ability to conduct reviews in accordance with the SOW and guidelines.
- Expertise and familiarity with major environmental regulations resulting from the following statutes and that are included in Table 1 of this Plan:
    - RCRA (and New Mexico implementation through the HWA).
    - CAA (including NESHAPs and the New Mexico Air Quality Act).
    - CWA (and New Mexico implementation through the New Mexico Water Quality Act).
    - Safe Drinking Water Act (and implementation through the New Mexico Drinking Water Requirements).
    - New Mexico Solid Waste Act.
    - Other areas of regulatory expertise may be required, pending scope changes as requested by the NMED.
- Experience with performing environmental compliance reviews.
- Meet the additional requirements and conditions included in the SOW (e.g., meet DOE security requirements to access OUO documentation, access to Controlled Unclassified Information, etc.).

6.2 Program Manager – Ms. Renee Echols (Firewater)

Ms. Renee Echols is the Program Manager (PM)/Team Lead for this Review. Mr. Greg Edwards is the Technical Team Lead and Assistant Program Manager (APM). Both Ms. Echols and Mr. Edwards will assure that the following activities are appropriately managed and addressed:

- Task assignments to Review Team members
- Interfacing with the client
- Ensuring competence of the Review Team
- Ensuring integrity of the Review Process
- Preventing and resolving conflicts
- Assuring compliance and implementation with this Review Plan

6.3 Roles and Responsibilities

The Program Manager, or her designee (APM) will assign each Review Team member a set of criteria in one or more of the six focus areas identified above. Furthermore, the Program Manager is responsible for ensuring that personnel are trained and qualified to do their assigned work in a manner that achieves performance levels or objectives, and their proficiencies are maintained in accordance with this Review Plan.

Each Team member will be responsible for developing and or updating Lines of Inquiry (LOI) for each of the criteria assigned. Additionally, Review Team members will consider the following factors when developing LOIs:

- Potential impacts to DOE and/or SIMCO.
- Schedule/timetable adherence.
- Communication.
- Accuracy of reporting and documentation.
- Confidentiality and information security.
- Lessons Learned from previous environmental violations.
- Identifying precursors of future violations.

The LOIs will be incorporated into Review Checklists for the Review. The Review Plan will be updated to reflect each team members' assigned criteria.

Additionally, the complexity of the Review necessitates responsive management of the interfaces among the Review Team, SIMCO Representatives, DOE Representatives and Subcontractors, as applicable, to maintain control of contractual work and to facilitate the flow of technical information. The Program Manager and the POC will be responsible for managing these interfaces.

7. DELIVERABLES/TIMETABLE

Per the requirements of the SOW, the Review Team will provide SIMCO with the following Table 2 reporting deliverables in writing.

Table 2 – Triennial Review Team Reporting Requirements to POC

Report Title	Content	Frequency	Due Date
Progress Report	Progress made in completing contract tasks	Monthly	10th of the month for the previous month
On-site Review Progress (if applicable)	Summary of review progress and findings	Weekly	Friday of each week on-site (to be determined)
Review Plan (Draft and Final)	Outlines the review objectives, scope and timetable, and the products that the review will generate.	Once	Draft (for DOE/SIMCO review): December 20, 2024
Review Checklists (Draft and Final)	Assists the reviewers in conducting a thorough, systematic, and consistent review. Used to guide observations and help the reviewer to assess whether evidence meets review criteria.	Once	Draft (for DOE/SIMCO review): January 9, 2025 Final (addressing comments): January 23, 2025
Close out Report	Summary of findings and recommendations from review	Final Review Progress Meeting	May 7, 2025
Draft Review Report	Summary of review process, information collection activities, findings, and recommendations	Once	May 23, 2025

Table 2 – Triennial Review Team Reporting Requirements to POC

Report Title	Content	Frequency	Due Date
Comment Resolution Summary (Draft and Final)	Detail summary of how comments on the draft report were resolved	Once	Draft (for DOE/SIMCO review): May 30, 2025 Final (addressing comments): June 16, 2025
Final Report[1]	Summary of review process, information collection activities, findings, and recommendations	Once	June 28, 2025

[1]Note that the Final Report will be submitted to the NMED by the Permittees and posted on the Information Repository within five working days of submittal.

Documentation and deliverables will be provided to the SIMCO POC by the Program Manager for acceptability and accuracy and maintained to prevent breach of confidentiality and security. Records will be protected against damage, deterioration, or loss. Requirements and responsibilities for records transmittal, distribution retention, maintenance, and disposition will be established and documented as required by the Quality Assurance Plan (QAP). Following are the required deliverables for the Review:

7.1.1 Monthly Reports:

Written monthly reports will be provided to SIMCO in a format agreed upon by SIMCO and the Review Team. Monthly reports will be submitted via email to the POC by the 10th of each month.

7.1.2 Review Checklists:

Review Checklists will be developed to assist the reviewers with conducting a thorough, systematic, and consistent review. Checklists are used to guide observations and help the reviewer to assess whether evidence meets review criteria. These checklists will provide consistency and will be tracked to completion. Review Checklists will be provided to SIMCO for review and approval prior to commencing the review.

7.1.3 Draft Triennial Review Report:

The Review Team will prepare the Draft Triennial Review Report remotely. The draft will be submitted to SIMCO for comments. The draft report will include the following items:

- Review objectives.
- Review scope.
- Identification of the reviewers.
- The dates and methods the review activities were undertaken.
- Review criteria.
- Review draft findings.
- Review draft conclusions.

- Draft recommendations for corrective or preventative action.

7.1.4 Final Triennial Review Report:

The Review Team will prepare the Final Triennial Review Report remotely. The Final Report will include the following items with comments from the draft report resolved and/or incorporated:

- The review objectives,
- The review scope,
- Identification of the reviewers,
- The dates and places where the review activities were undertaken,
- The review criteria,
- The review draft findings,
- The review draft conclusions, and
- Recommendations for corrective or preventative action.

7.1.5 Triennial Review Records:

The Review Team will submit copies of records (including electronic records) generated during the Review to SIMCO. Records will include copies of completed checklists, interview records, draft and final report, and non-SIMCO documents that were used during the Review. The Review Team will turn over all Security related working papers, logbooks, write ups, and materials generated by the Team or provided by SIMCO. Triennial Review records will be marked, "Official Use Only (OUO)". The SIMCO POC may designate other documents as OUO, as necessary. The Review QAP will also provide guidance for records maintenance.

8. THIRD TRIENNIAL REVIEW PROCESS

Pre-Review Activities

Develop a Review Plan that will utilize the activities, criteria, lines of inquiry (LOI), and Compliance Checklists contained in the SOW that will ensure comprehensive coverage of all regulations and requirements. Using our Team Technical Lead's and other members' audit expertise, the Review Plan will be informed by industry best practices and will fully comply with DOE and industry audit standards. The Review Plan will be supported by an execution schedule, and as such, will serve as the project execution plan for the Review. We will submit the initial Review Plan within two weeks of subcontract award/Notice to Proceed. We will review this plan with SIMCO to resolve SIMCO comments on the draft Review Plan. The Review Plan will be developed and similarly organized as the Review Plans used for the First and Second Reviews and will include the following elements:

- Review objectives – to direct planning and establish the method for the review;
- Review criteria and any reference documents – criteria to be used to compare collected evidence, and reference documents including relevant permits, licenses, authorizations, etc. to define environmental compliance standards;

- Review Scope – extent and boundaries of the Review;
- Quality Plan – identifies the quality assurance procedure that will be used during the Review;
- Review timetable – to identify date and places where activities will be conducted and duration needed for each activity;
- Roles and responsibilities for Team members – Team Technical lead to determine the functions to be performed by each Team member.

The team Technical Lead will manage the development of detailed LOI's and will serve as the focal point for requests for documents required by the Team, coordinating virtual interviews and developing the schedule and scope for the onsite effort. The Team Lead will maintain configuration control of any needed changes to the Review Plan.

The Review Plan development and implementation will be conducted in compliance with the Third Triennial Review Quality Plan to assure the integrity of the Review. This Quality Plan will be developed in the planning phase and will be tiered from Firewater's corporate Quality Assurance Program. L&A's extensive expertise in quality assurance will also be utilized in the development of the Quality Plan.

The RFP-provided Compliance Checklists (**Review Checklists**, per the SOW) will be fully developed and submitted to SIMCO per the deliverable schedule. The Team will meet virtually with SIMCO to discuss and resolve SIMCO comments on the Compliance Checklists. The Compliance Checklists will be used to both facilitate and document the results for each area of the Review. Using the example provided in the RFP, the Team will enhance the Compliance Checklists to include all the requirements identified in the Review Plan and fully incorporate the Team's final LOIs. Additionally, the completed Compliance Checklists will be used to help develop the Review Report.

Through a series of calls and web-based meetings, the Team will collect and review the required **background information** (e.g., site specific information, environmental issues, relevant standards, operating manuals, plans, and procedures, environmental permits, etc.). A critical element of this preparatory analysis will be the Team's review of WIPP's compliance record since the First and Second Triennial Reviews, to identify and evaluate trends, pinpoint any causal analyses completed on reported non-compliances, and evaluate the adequacy of corrective actions. In addition, the Team will evaluate corrective actions that resulted from both Reviews as part of its analysis. These insights will be used to refine the Team's LOIs. As necessary, the Team will specifically discuss and attempt to resolve any questions Team Members may have about WIPP's operation and/or applicable regulatory requirements.

The Review Plan LOIs and the Compliance Checklists will be updated throughout the Team's review of background information, to allow for incorporation of any needed revisions or expansions stemming from the Team's research activities. Any proposed revisions will be closely coordinated with SIMCO. The Team Lead will ensure the final, updated Review Plan incorporates industry best practices and identifies and complies with auditing principles.
The Review Plan and its implementing procedure will define the means and protocols for communication between the Team and SIMCO. These communication protocols will include identification of the points of contact and method for immediate communication of any non-compliant conditions identified during the Review. This will enable SIMCO to confirm and assess the significance of the condition, as well as address the deficient condition as soon as practical. The Team understands the requirements of the WIPP

Hazardous Waste Permit – specifically non-compliant conditions that pose an immediate threat to human health or the environment must be reported to NMED within 24 hours of discovery.

While not included or specified in the approved Triennial Review SOW and Guidelines, our Team recognizes that WIPP and SIMCO operations are routinely assessed by DOE, NMED and EPA organizations. The Team will leverage its WIPP insights and understanding to maintain cognizance of such reviews conducted during the Triennial Review period, and incorporate insights or changed conditions within our Review Plan and findings.

Review Activities

Throughout the Review, we will implement the Review Plan in a coordinated manner, supported by regular Team meetings and in coordination and collaboration with the SIMCO Point of Contact (POC). We will provide monthly Progress Reports to the POC on the Review results as it progresses.

We currently estimate one onsite visit for inspections and certain WIPP personnel interviews to occur early in the Review process. We are not proposing that all team members travel to the WIPP site in order to minimize costs associated with the onsite portion of the Review. The duration of the onsite visit is estimated to be two weeks, however this can be revised as necessary, and may be split into two visits, based on actual progress. The Team has estimated that **safety and security training** will occur over the first week of the onsite phase.

The **collection and recording of information** will be accomplished by performing Review activities required to:

- Determine through investigation, examination of records, and interviews if CBFO and SIMCO comply with the terms and conditions of permits and authorizations that stem from the applicable environmental regulations within the Table 1 of the SOW (i.e., RCRA, CAA, CWA, New Mexico SWA, TSCA, EPCRA, NEPA, CERCLA, NMSWA, and FIFRA).
- Determine the robustness of the oversight processes in place for WIPP's environmental programs to ensure the technical content of the implementation program is effectively controlled, including compliance with the applicable DOE Orders.
- Determine through investigation, examination of records, and interviews how robust the oversight processes for environmental programs are.
- Document findings in a written report to be submitted to SIMCO at the conclusion of the Review.
- Perform the Review in accordance with SIMCO SOW guidelines (reference Section 10.0).
- Perform the portions of the Review that apply to SIMCO Security as outlined in DOE Order 470.4B as it pertains to the permit.
- Provide guidance and support to address or close findings and recommendations that have been identified in the Review, as needed and directed by SIMCO.

The Team's Review LOIs will assess the sufficiency of programs and processes that underpin compliance, including employee training, data collection, metrics and trends, issues management, corrective actions, and timeliness and quality of required reporting. Our Team's corporate expertise with the design and review of contractor/performance assurance systems will guide these LOIs to obtain the greatest insights and most comprehensive review possible. Review Team members that review SIMCO Security records and procedures will comply with the requirements of DOE Order 470.4B, "Safeguards and Security Program".

The methods of review will include gathering information for independent review; limited field observations; completion of the Compliance Checklists; examination of procedures; records and reports; meetings, and interviews. Information gained through interviews will be verified by supporting information from independent sources. Throughout the review, the Team will document the Review results in a timely manner, using the Compliance Findings and Conclusions template identified in the Review Plan. Statistical representative sampling of documents may be necessary to ensure thoroughness of the Review.

Environmental sampling has not been performed on either the First and Second Triennial Reviews, however if this becomes necessary, the Team will coordinate this with the SIMCO POC. During the Review, any identified non-compliant conditions will be brought to the attention of the SIMCO POC immediately to assess the significance of the potential non-compliance and address deficiencies. On a regular basis throughout the Review, the Team will maintain a list of **findings and conclusions** so that SIMCO can be made aware of any issues that could be corrected without waiting for the final report. The Team will also propose a virtual out-brief meeting at the completion of the LOIs and provide a formal Close-out Report, which summarizes the complete list of the Team's findings and conclusions.

Post Review Activities

The development of the **draft Third Triennial Review Report** will occur at the completion of Review activities and will be overseen and led by the Team Lead; however, each Team Member will contribute to and participate in the Report's development and review. The development of the Report will be conducted remotely, through a series of Team web-based meetings and calls, using the agreed upon review documents, such as the Compliance Findings and Conclusions template. The draft report will include all required elements – review objectives, criteria, and scope; reviewers; details, dates, and locations of review activities; draft findings and conclusions; and draft recommendations for corrective or preventative action.

Our Team intends to submit the draft Triennial Review Report to SIMCO on or before May 15, 2025. The Team will work with the SIMCO POC to define the specific individuals who will review and comment on the draft Triennial Review Report, as well as the parameters for their review. This coordination will result in an agreed upon schedule for the comment period and ensure the appropriate personnel will be available to review and comment on the draft report. As the Triennial Review is an independent, external compliance review, we anticipate SIMCO's and CBFO's review of the draft will be limited to a factual accuracy review, to include identification of gaps or issues related to compliance with the approved Triennial Review Scope of Work and Guidelines document. Our Team will communicate regularly with the SIMCO POC to provide status updates and will propose formal conference calls, as needed, to discuss SIMCO comments prior to their final resolution. The disposition and resolution of the comments will be well documented and indexed in a comment resolution matrix, in accordance with the Review Plan.
After the draft Report has been reviewed and comments have been resolved and assuming no unforeseen delays, the Team will deliver the **Third Triennial Review Final Report**, including the Comment Resolution Addendum, on schedule, by June 28, 2025. The Triennial Review Final Report will be error-free and fully suitable for submittal to NMED as required by the Settlement Agreement, and subsequent posting to the Information Repository website.

9. QUALITY PLAN

The Quality Assurance (QA) Plan, Revision 0 dated April 23, 3021, that was developed for the Second Triennial Review, will be updated to include the requirements of the Third Triennial Review are met, and to ensure the integrity of the Triennial Review. The QA Plan identifies quality assurance procedures that will be undertaken during the Triennial Review. The QA Plan will be submitted to SIMCO as a draft for comment prior to the Review Team issuing a final QA Plan.

Attachment B

Quality Assurance Plan

FIREWATER

Quality Assurance Plan
Waste Isolation Pilot Plant Project (WIPP)
Third Triennial Review

For

Salado Mining Contractors

Subcontract No. DOE23-PO523986

February 6, 2025

Revision 0

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FIREWATER

REVISION LOG

Rev No.	Date	Description	Total Pages	Affected Pages
0	2/6/2025	Final	22	All

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FIREWATER

APPROVALS

Approval:

2/06/2025

Michael Jones
Point of Contact
SIMCO

Date

Approval:

02/06/2025

Renee Echols
President and Program Manager
Firewater Associates, LLC

Date

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ACRONYMS AND ABBREVIATIONS

AEA Atomic Energy Act
ASME American Society of Mechanical Engineers
ASNT American Society for Nondestructive Testing
CAA Clean Air Act
CAP Corrective Action Plan
CAQ Condition Adverse to Quality
CBFO Carlsbad Field Office
CFR Code of Federal Regulations
CGD Commercial Grade Dedication
CGI Commercial Grade Item
CIO Chief Information Officer
CWA Clean Water Act
DEAR U. S. Department of Energy Acquisition Regulations
DOE U. S. Department of Energy
DQO Data quality objective
EDO Environmental data operation
EM (DOE Office of) Environmental Management
EMS Environmental Management System
EPA U. S. Environmental Protection Agency
EPCRA Emergency Planning and Community Right to Know Act
HWA New Mexico Hazardous Waste Act
HWFP Hazardous Waste Facility Permit
ISMS Integrated Safety Management System
ISO International Organization for Standardization
GPDD General Plant Design Description
M&DC Monitoring and data collection (equipment)
M&TE Measuring and test equipment
MOC Management and Operating Contractor
NARA National Archives and Records Administration
NDE Nondestructive Examination
NEPA National Environmental Policy Act
NESHAPS National Emission Standards for Hazardous Waste Pollutants
NIST National Institute of Standards and Technology
NMAC New Mexico Administrative Code
NMED New Mexico Environment Department
NMSA New Mexico Statutes Annotated
NQA Nuclear Quality Assurance
NRC Nuclear Regulatory Commission
NUREG Nuclear Regulatory Commission Report Designation
PCB Polychlorinated biphenyl
QA quality assurance
QAP Quality Assurance Program

QAPD Quality Assurance Program Description/Document (CBFO)
QAPjP Quality Assurance Project Plan
QC Quality Control
QIP Quality Assurance Implementation Plan
RCRA Resource Conservation and Recovery Act
RIDS Records Inventory and Disposition Schedule
SIMCO Salado Mining Contractors
SARA Superfund Amendments and Reauthorization Act
SCAQ Significant Condition Adverse to Quality
S/CI Suspect/Counterfeit Item
SEP Supplemental Environmental Project
SFO Settlement Agreement and Stipulated Final Order
SOP standard operating procedure
SOW Scope of Work
SQA Software Quality Assurance
SSC structure, system, or component
STR Subcontract Technical Representative
TSCA Toxic Substances Control Act
TRU transuranic
TRAMPAC TRUPACT-II Authorized Methods for Payload Control TRU Transuranic
TRUPACT Transuranic Package Transporter (Model II and III)
TSCA Toxic Substances Control Act
UL Underwriters Laboratories
V&V verification and validation
WAC Waste Acceptance Criteria
WAP Waste Analysis Plan

QUALITY ASSURANCE PLAN POLICY STATEMENT

The Third Triennial Review Team (Review Team) of Firewater Associates, LLC (Firewater) and Longenecker & Associates (L&A) is committed to performing the Waste Isolation Pilot Plant Project (WIPP) Third Triennial Review in a manner that minimizes risk and environmental impacts and maximizes safety, reliability, and performance in accordance with the Salado Mining Contractors (SIMCO) Subcontract Statement of Work (SOW) dated September 19, 2024.

The Firewater Quality Assurance Plan (QAP) is intended to provide an effective management system tailored to the assessment process through the deliberate and graded application of Quality Assurance (QA) elements. The QAP will include the verification and control of information and documentation, recordkeeping, and reporting. The graded approach determines the degree of application of controls commensurate with importance and relative risk to safety and regulatory compliance, among other factors. It is Firewater's policy for the Review Team to participate in establishing, implementing, assessing, and improving its QA program. Each individual is responsible for the quality of his or her own work. SIMCO along with Firewater management verifies the achievement of quality through periodic management assessments.

EXECUTIVE SUMMARY

This QAP provides the primary requirements for the integration of quality functions into the appropriate aspects of the Review Team functional and project activities while conducting the Third Triennial Review activities both on the WIPP site and remotely. Effective implementation of Quality Assurance (QA) requirements supports the principles and functions of the Integrated Safety Management System (ISMS).

This QAP promotes and integrates a Safety Conscious Work Environment, in which all personnel feel that:

- They are empowered to raise safety questions without fear of retaliation.
- Management wants and willingly listens to their concerns.
- Issues they identify are managed through constructive and timely processes.

The Safety Conscious Work Environment Policy is strongly supported by the leadership of both Firewater and L&A.

TABLE 1 – QA PLAN SOURCE DOCUMENTS	
DEVELOPMENTAL RESOURCES	**TITLE**
10 CFR Part 21	"Reporting of Defects and Noncompliance"
10 CFR Part 71, Subpart H "Quality Assurance"	"Packaging and Transportation of Radioactive Material"
10 CFR Part 830, Subpart A	"Nuclear Safety Management"
40 CFR Part 194	"Criteria for the Certification and Re-Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal Regulations"
40 CFR Part 261	"Identification and Listing of Hazardous Waste"
48 CFR Part 970.5204-2	"Laws, Regulations, and DOE Directives"
ASME NQA-1-1989 Basic and Supplementary Requirements	"Quality Assurance Program Requirements for Nuclear Facilities"
ASME NQA-2a-1990 addenda, Part 2.7	"Quality Assurance Requirements of Computer Software for Nuclear Facility Applications"
NM 48901 39088 – TSDF/WIPP	"WIPP Hazardous Waste Facility Permit"
SIMCO Subcontract DOE23-PO523986, November 20, 2024	"Waste Isolation Pilot Plant Project Third Triennial Review Statement of Work"
DOE Order 226.1B	"Implementation of Department of Energy Oversight Policy"
DOE Order 414.1D	"Quality Assurance"
DOE Policy 450.4A	Integrated Safety Management Policy

DOE/CBFO-94-1012, Rev. 14, Dated 11/06/2023	"Quality Assurance Program Description"
DOE/CBFO-09-3442, Dated February 2015	"CBFO Integrated Safety Management System" D
EM-QA-001, Rev. 2, Dated 4/10/2019	"Office of Environmental Management (EM) Quality Assurance Program (QAP)"
SNT-TC-1A-1980	American Society for Nondestructive Testing (ASNT) "Recommended Practice No. SNT-TC-1A, Personnel Qualification and Certification in Nondestructive Testing," August 1980
GUIDANCE DOCUMENT DOE G 414.1-2B	"Quality Assurance Program Guide"
DOE G414.1-1C	"Management and Independent Assessments Guide"
NUREG/BR-0167 (1993)	"Software Quality Assurance Program and Guidelines"

1.0 BACKGROUND

The Third Triennial Review is a systematic, independent, and documented process of objectively obtaining and evaluating evidence to determine whether specified environmental regulatory and operations requirements are met. Firewater, and its partner L&A, will utilize similar processes and personnel for the Third Triennial Review that were used for completion of the First and Second Triennial Reviews in 2018 and 2021, respectively. The Review Team is composed of knowledgeable professionals using industry approved audit techniques, consensus standards and familiarity with applicable environmental regulations to conduct the Review in a manner that meets SIMCO requirements.

The Third Triennial Review QAP incorporates the applicable requirements from DOE Order 414.1D, Quality Assurance; Title 10 Code of CFR, Part 830, Subpart A, Quality Assurance Requirements; 10 CFR Part 71, Subpart H, Quality Assurance, and DOE HQ EM-QA-001, EM Quality Assurance Program for conducting activities that affect, or may affect, nuclear safety at DOE nuclear facilities. The same ten criteria, using the "graded approach," are applied to non-nuclear facilities and activities with the potential to cause harm from radiological or other hazards regardless of where they may occur. This QAP will identify the quality

assurance procedures to be utilized during the Review. The Review will be managed by the Review Team Lead with oversight from SIMCO.

2.0 SCOPE AND GUIDELINES

This QAP will ensure that the Review Team meets the Review requirements and key performance parameters. The objective of the Third Triennial Review is to determine whether specified environmental regulatory requirements within the designated areas are being properly implemented at the WIPP facility. In those areas, the Review's main goal is to identify potential regulatory deficiencies, potential regulatory violations, and deficiencies that could lead to violations of environmental regulations. Secondary objectives of the Review may also include the challenges regarding effective implementation of the environmental programs at the WIPP facility and the strengths that reflect the maturity of those programs.

The scope of the Third Triennial Review shall encompass implementation of the environmental regulations indicated in Table 1 below to the extent they apply to the WIPP facility. NMED has been consulted and has agreed with the scope of the Review and the areas of regulatory compliance to be examined. The primary focus of the Third Triennial Review shall be those areas of regulatory compliance for which NMED has regulatory responsibility. Additionally, as indicated in the footnote to Table 1, the scope may include evaluations of the continued effectiveness of corrective actions taken to address findings/observations that resulted from the first Triennial Review.

Table 1 – Environmental Regulations*

Item	Applicable Environmental Statute or Regulation	Focus of the Review
1	**Resource Conservation and Recovery Act (RCRA)** (and New Mexico implementation through the **HWA**)	Processes and procedures to assure compliance to the operational requirements and compliance to requirements for the accumulation and retention of records and monitoring data. Corrective actions taken to prevent the recurrence of non-compliances. Development of new reports/notifications resulting from the renewal Permit that became effective on November 3, 2023.
2	**Clean Air Act (CAA)** (including the **National Emission Standards for Hazardous Air Pollutants (NESHAPs)** and the **New Mexico Air Quality Act)**	Processes and procedures to assure compliance and the accumulation of required monitoring data.

3	**Clean Water Act (CWA)** (and the **New Mexico Water Quality Act**)	Processes for controlling permitted discharges and the collection of monitoring data for reporting to the NMED.
4	**New Mexico Solid Waste Act**	Procedures for implementation and the reporting requirements
5	**Emergency Planning and Community Right to Know Act (EPCRA)** (and the **New Mexico Hazardous Chemicals Information Act)**	Processes for reporting spills and the processes to accumulate and report the required information annually.
6	**Toxic Substances Control Act (TSCA)** and polychlorinated biphenyl (PCB) Conditions of Approval	Processes and procedures to assure compliance to the operational requirements and compliance to the requirements for the accumulation and retention of records and monitoring data.
7	**National Environmental Policy Act (NEPA)**	Procedures for identifying decisions that require NEPA review and the process for conducting the review.
8	**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**	Processes for determining reportable quantities.
9	**Federal Insecticide, Fungicide, and Rodenticide Act** (and the **New Mexico Pesticide Control Act**)	Assure only licensed applicators are used at WIPP Project facilities.

*Additionally, the scope may include the continued effectiveness of corrective actions taken to address findings/observations that resulted from previous WIPP Triennial Reviews.

3.0 PURPOSE

SIMCO has determined that a QAP should be written to more precisely describe the necessary controls required for the Review Team to identify and document their results and conclusions relative to the unique synergy between the various and complex environmental regulations and those organizations interacting to ensure that compliance is achieved.

The purpose of this QAP is to provide direction and guidance to the Review Team and identifies and incorporates cost-effective, and timely quality measures to promote efficient delivery of the Review that meets the requirements outlined in the Third Triennial Review SOW.

This QAP provides the primary requirements for the integration of quality functions into all aspects of the review process. Effective implementation of review methods and requirements supports the principles and functions of the DOE Integrated Safety Management System (ISMS), documented in DOE/CBFO-09-3442 “DOE Carlsbad Field Office (CBFO) Integrated Safety Management System Description” and WP 15-GM.03 “WIPP Integrated Safety Management System Description”.

This QAP is the written directive of the Firewater President and Program Manager to accomplish the planned tasks and to implement procedures that provide the controls and sound management practices needed to ensure that contractual obligations are met. This QAP is designed to use training, procedures, assessments, and surveillance functions as management tools to ensure that all functional and project activities, including subcontract work, are executed in a quality and safe manner that will protect workers, public health, and the environment, promote the success of DOE and SIMCO, and meet or exceed contract requirements. For subcontracted work, this is accomplished through a flow down of requirements and standards in procurement documents and subcontract terms and conditions.

The graded approach is the process by which the extent (level of rigor) of application of control is determined based on the importance of the activity or scope of work relative to public and worker safety, potential for environmental releases, working within facility performance boundaries, and achieving programmatic mission objectives. A graded approach is applied to meet customer expectations and utilize resources in a cost-effective manner. One to two site visits by certain Review Team members, and on site or remote WIPP personnel interviews will be utilized to assess and evaluate WIPP facility operations for compliance with regulatory requirements and adherence to standard operating procedures.

This QAP implements applicable requirements of DOE 0rder 226.1B, Implementation of Department of Energy Oversight Policy, in the areas of management and independent assessment, and integrates roles and responsibilities of the Triennial Review Team into the ISMS program.

4.0 GOALS AND OBJECTIVES

This plan outlines the approach for the Review and describes the roles and responsibilities of project personnel in performing QA functions. The goal of the Third Triennial Review is to identify:

- Potential Regulatory deficiencies.
- Potential violations.
- Deficiencies that could lead to violations of environmental regulations.

The QAP will ensure that the Review is conducted in accordance with the Review Plan that will be reviewed and approved by SIMCO. Both the QAP and Review Plans are living documents that will be updated as required to ensure the Review is successful at meeting the Permittee goals and objectives, as the Review progresses.

5.0 QUALITY MANAGEMENT SYSTEM

The Review Team will conduct its activities in accordance with the Review Plan and schedule. The Review Team will identify potential deficiencies that could have an adverse impact on the continued operation of the WIPP facility and communicate those immediately to the SIMCO Point of Contact (POC).

The Review Team will perform its review in accordance with DOE O 414.1D Quality Assurance Criterion 10 “Assessment/Independent Assessment”. This QAP is structured to include these 10 criteria along with applicable requirements of Nuclear Quality Assurance (NQA-1) as well as relevant requirements of EM-QA-001, Office of Environmental Management (EM) and its “adoptive” standard, NQA-1. Because the International Organization for Standards (ISO) 14001 is also applicable in some cases, the applicable requirements of ISO 9001 are also considered as appropriate. The following QA requirements apply in cooperation with the CBFO and SIMCO QA Programs. As is customary with the 10 criteria structure, this QAP has three major elements: management, performance, and assessment. If there are conflicts between the Review Team requirements and WIPP requirements, the Review Team Lead will determine the path forward in consultation with the SIMCO POC and appropriate SIMCO Environmental Program Manager.

5.1 PROGRAM

This QAP is flowed down from the Firewater Associates, LLC Quality Assurance Program Plan. This QAP, in combination with the Review Plan, identifies the organization, functional responsibilities, and interfaces necessary to meet the goals and objectives described in SIMCO’s SOW. The Review Team consists of highly educated and experienced professionals led by a Program Manager with over 30 years of experience in a variety of nuclear environmental and waste management projects. Only certain criteria apply to the Review Team outside of independent assessment and those criteria are described within this QAP. If work (e.g., inspections) is performed on the WIPP Site, the Review Team will implement SIMCO quality requirements as applicable. The focus of the Review Team will be to fulfill the safety requirements of the WIPP facility while also fulfilling Contract obligations.

The Review Team will comply with SIMCO and DOE quality management systems as appropriate. The Review Team endorses the establishment and maintenance of a Quality Management System approach. Quality Assurance, as a management tool, provides valuable performance improvement initiatives. The Review Team will foster an unimpeded communication program to solicit feedback from all members of the Review Team regarding opportunities for improvement. This QAP prompts early identification, documentation, classification, correction, elimination, and follow-up of items and processes that do not meet established requirements or goals and do not result in the requisite or expected quality.

The Review Team will meet its objectives by utilizing an integrated quality approach to define quality standards and identify those elements with the highest risks based upon a grading scheme, to measure and continuously improve quality.

One method employed by the Review Team will be a qualitative risk assessment that will be used for each regulation or group of similar citations or activities. The Risk Assessment (RA) will become a project record that will be available for review upon completion. The purpose of the RA will be to ensure proper priority is placed on an activity such as potential for improper

implementation of a procedure. Based on uncertainty relative to an activity and potential for failure within that activity, the Review Team will provide management with a list of deficiencies that could lead to violations of environmental regulations. In most cases, the probability of failure cannot be fully quantified or qualified until the assessment of the regulation and area have been completed. Continuous Improvement is the goal of risk management.

5.2 TRAINING

The Review Team consists of highly educated and experienced professionals with several members participating in the First and Second Triennial Reviews. The Review Team's experience elevates it above the need to train to the "basics". The Review Team's experience gives each member structure and discipline above the novice level. Therefore, the need for redundant and step-by-step procedures is unnecessary for this Review.

The WIPP Environmental Management System (EMS) is compliant with ISO 14001 and as such uses ISO 9001 as a system framework for implementation. Under the requirements of ISO 14001, procedures are only needed in certain areas such as document control and records as are the requirements of this QAP. Each member relies on their education, experience, discipline, and professionalism to guide them. Every review initiated for DOE does require some level of indoctrination and training.

The magnitude and importance of this Review makes it even more imperative that the Review Team understands the unique WIPP environmental, safety, and operational requirements. That is why the team has been assigned required reading not only relative to the assessment process, but to the myriad of documents and records that are relevant to this Review. Training assignments will be made by the Review Team Lead who tracks completion and effectiveness. The documented evidence of assignment completion is maintained by Firewater as a Quality Record. Quality in the Review Team organization is achieved through a clear understanding of the goals and objectives to be accomplished by each individual, as well as through each person's discipline training.

5.3 IMPROVEMENT

The quality improvement process Is established to ensure that the Review Team maintains focus on achieving review goals and objectives. The Review Team will continuously focus on the goals and objectives of this Third Triennial Review, and to reduce the risk of failure. Many factors affect risk such as increase or decrease in the probability of an event occurring or may increase or decrease the consequence resulting from the occurrence of an event. These factors, when appropriately applied, can reduce risks to acceptable levels. The improvement program will perform risk assessments at stages during the Review to determine whether the Review is focusing on aspects with the greatest risk of failure, and

with greatest consequence. Improvements thus can be implemented and communicated to the Review Team resulting in an improved Review process.

Nonconformances may be identified in WIPP programs during this Review and if so, corrective actions may be developed along with causal analysis, corrective actions, and closure.

5.4 DOCUMENTS AND RECORDS

Documents, once approved and verified, will be maintained in hard copy, and electronic format backed up daily as records (NQA-1). The WIPP EMS is compliant with ISO 14001: 2015 and as such uses ISO 9001 as a system framework for implementation. Documents and Records will be managed in accordance with the SIMCO SOW and as further detailed in Section 8.0 below.

Records shall be protected against damage, deterioration, or loss. Requirements and responsibilities for records transmittal, distribution retention, maintenance, and disposition will be developed as needed using the Firewater program and will be sensitive to contradicting site records management procedures.

Performance Documents are policies, procedures, directives, charters, and program descriptions that define the Review Team's management systems, programs, and processes. Processes as documented in Performance Documents, implement the requirements of this QAP and applicable QA requirements mandated by law and contract to provide the details necessary for proper implementation of the QA management program using a graded approach. This ensures the level of documentation necessary to comply with a requirement is commensurate with the following:

- Relative importance to safety, safeguards, and security.
- Magnitude of any hazard involved as identified, analyzed, and controlled in the facility safety basis documents.
- Life-cycle stage of the facility/activity or project.
- Impact/consequences on programmatic mission of the facility/activity or project.
- Characteristics of the facility/activity or project.
- The nuclear safety classification or hazard category of the item or activity.
- Adequacy of existing safety documentation.
- Complexity of products or services involved.

• Environmental consequences and level of resource protection required.

• History of problems at a site, facility, or project.

Performance Documents that contain or implement regulatory requirements or other commitments denote those requirements or commitments in the associated sections or steps of the document. Performance Documents that are technical procedures incorporate job-specific hazard controls. The process for creation of specific documents that become "records" is defined in procedures, or other governing documents as required. These documents include or reference appropriate quantitative or qualitative acceptance criteria as appropriate for determining that results are satisfactory.

The word "shall" indicate mandatory requirements. The word "should" indicate a preferred or recommended approach. The word "may" indicate an acceptable or suggested means of accomplishment.

Review Team Procedures, checklists, and other appropriate means include the following:

- Organization Structure
- Risk Assessment Process
- Documents and Records Process
- Training Flow
- Lessons Learned Coordination
- Checklists
- Criteria Review and Approach Documents (CRADS)

Other instructions, procedures and appropriate means will be developed as needed.

5.5 WORK PROCESSES

The Review process is planned, authorized, and performed by technically competent individuals who provide leadership, direction, and oversight. The Review process is performed using technical standards developed or adopted from commercial practice, policies, procedures, and other appropriate means and contain a level of detail commensurate with the complexity and importance of the work being performed (i.e., graded approach). Environmental, quality, safety, and health requirements are integrated into the Review Teamwork processes.

The Review Team will follow the guidelines established in the SIMCO SOW as detailed in Section 6.1 below. The Review QAP encompasses only the assessment process. The team will be subject to WIPP Site requirements in most cases and will implement safe practices in all cases for any work performed on the WIPP Site.

5.6 DESIGN

Design is not applicable to this work.

5.7 PROCUREMENT

Procurement is not applicable to this work.

5.8 INSPECTION AND ACCEPTANCE TESTING

Inspection and Acceptance Testing is not applicable to this work.

5.9 MANAGEMENT/ SELF-ASSESSMENT

Periodic assessment of the Review process and progress will be performed by appropriate Firewater and L&A management.

The Review Team Management recognizes that there are risks associated with the performance of any item or performance of any activity. Risk is a quantitative or qualitative expression of possible loss or harm with consideration of the probability of occurrence of an unwanted event and the consequences resulting from it. Consequences can include adverse impacts on (1) health and safety of facility personnel and the public, (2) the environment, and (3) SIMCO Management objectives.

5.10 INDEPENDENT ASSESSMENT

Independent Assessment specifies a uniform method for scheduling, conducting, and reporting independent assessments designed to evaluate compliance with environmental, health, safety, quality, and regulatory requirements; evaluate process performance; and promote improvement.

Independent assessments are part of the Review Team assessment and oversight program. Independent assessments are performed to evaluate compliance with environmental, health, safety, quality, and regulatory requirements and to determine the effectiveness of the QA Program. Independent assessments may also be used to verify or validate conditions or fulfill directed senior management investigations and verify the effectiveness of corrective actions for significant issues. Independent assessments focus on performance of work with significant consideration given to compliance with requirements and safely performing work while achieving the goals of the organization. Their purpose is to improve performance and process effectiveness through assessing item and service quality, measuring adequacy of work performed and promoting improvement. Independent assessments are conducted by technically qualified and knowledgeable staff who are not responsible for supervising or performing the work being reviewed.

6.0 TRIENNIAL REVIEW SCOPE

The Review Team will focus on the environmental statutes, regulations and Orders listed in Table 1 of this QAP. The activities to be performed by the Review Team will include:

- Determine, through investigation, examination of records, and interviews, if the CBFO and SIMCO comply with the terms and conditions of permits and authorizations implementing the environmental regulations that stem from the listed statutes. Review Team members reviewing SIMCO Security records and procedures shall comply with the requirements of DOE Order 470.4B, Safeguards and Security Program, Attachment 2, Contractor Requirements Document Safeguards and Security Program Planning.
- Determine, through investigation, examination of records, and interviews, if the CBFO and SIMCO have programs in place to identify and implement new environmental requirements when they are promulgated.
- Examine the status of the EMS with regard to completeness. Completeness is defined as including the major activities that impact the environment and providing a method for mitigation of the impacts.
- Determine, through investigation, examination of records, and interviews, the robustness of the oversight process(es) in place for the environmental programs at the WIPP facility to assure the technical content of the implementation programs is effectively controlled.
- Document findings in a written report that will be submitted to the Permittees through the SIMCO Point of Contact (POC) at the end of the review. All findings relating to SIMCO Security shall be submitted to SIMCO Security Manager for review and approval before publication or release. Upon discovery of a potential SIMCO Security finding, the Reviewer must immediately notify the SIMCO Security Manager.
- Perform the Triennial Review as outlined in section 10.0, *Triennial Review Guidelines* of the SOW. As required by the SOW, Review Team members will keep information relative to the Review Confidential. Review Team members will sign Nondisclosure Agreements that will be provided to the SIMCO POC prior to initiating the Review process.
- Provide guidance and support, as needed, to address/close findings and recommendations identified during the Triennial Review.

6.1 METHOD

The Review Team will utilize a variety of techniques such as, interviews, observations, and document reviews. Review Team members will travel to the WIPP Site to conduct Review activities and perform personnel interviews in accordance with the SIMCO SOW and the approved Review Plan:

Pre-Review Activities

Develop a Review Plan that will utilize the activities, criteria, lines of inquiry (LOI), and Compliance Checklists contained in the SOW that will ensure comprehensive coverage of all regulations and requirements. Using our Team Technical Lead's and other members' audit expertise, the Review Plan will be informed by industry best practices and will fully comply with DOE and industry audit

standards. The Review Plan will be supported by an execution schedule, and as such, will serve as the project execution plan for the Review. We will submit the initial Review Plan within two weeks of subcontract award/Notice to Proceed. We will review this plan with SIMCO to resolve SIMCO comments on the draft Review Plan.

The Review Plan will be developed and similarly organized as the Review Plans used for the First and Second Reviews and will include the following elements:

- Review objectives – to direct planning and establish the method for the Review.
- Review criteria and any reference documents – criteria to be used to compare collected evidence, and reference documents including relevant permits, licenses, authorizations, etc. to define environmental compliance standards.
- Review Scope – extent and boundaries of the Review.
- Quality Plan – identifies the quality assurance procedure that will be used during the Review.
- Review timetable – to identify date and places where activities will be conducted and duration needed for each activity.
- Roles and responsibilities for Team members – Team Technical lead to determine the functions to be performed by each Team member.

The team Technical Lead will manage the development of detailed LOI's and will serve as the focal point for requests for documents required by the Team, coordinating virtual interviews and developing the schedule and scope for the onsite effort. The Team Lead will maintain configuration control of any needed changes to the Review Plan.

The Review Plan development and implementation will be conducted in compliance with the Third Triennial Review Quality Plan to assure the integrity of the Review. This Quality Plan will be developed in the planning phase and will be tiered from Firewater's corporate Quality Assurance Program. L&A's extensive expertise in quality assurance will also be utilized in the development of the Quality Plan.

The RFP-provided Compliance Checklists (**Review Checklists**, per the SOW) will be fully developed and submitted to SIMCO per the deliverable schedule. The Team will meet virtually with SIMCO to discuss and resolve SIMCO comments on the Compliance Checklists. The Compliance Checklists will be used to both facilitate and document the results for each area of the Review. Using the example provided in the RFP, the Team will enhance the Compliance Checklists to include all the requirements identified in the Review Plan and fully incorporate the Team's final LOIs. Additionally, the completed Compliance Checklists will be used to help develop the Review Report.

Through a series of calls and web-based meetings, the Team will collect and review the required **background information** (e.g., site specific information, environmental issues, relevant standards, operating manuals, plans, and procedures, environmental permits, etc.). A critical element of this preparatory analysis will be the Team's review of WIPP's compliance record since the First and Second Triennial Reviews, to identify and evaluate trends, pinpoint any causal analyses completed on reported non-compliances, and evaluate the adequacy of corrective actions. In addition, the Team will evaluate corrective actions that resulted from both Reviews as part of its analysis. These insights will be used to refine the Team's LOIs. As necessary, the Team will specifically discuss and attempt to resolve any questions Team Members may have about WIPP's operation and/or applicable regulatory requirements.

The Review Plan LOIs and the Compliance Checklists will be updated throughout the Team's review of background information, to allow for incorporation of any needed revisions or expansions stemming from the Team's research activities. Any proposed revisions will be closely coordinated with SIMCO. The Team Lead will ensure the final, updated Review Plan incorporates industry best practices and identifies and complies with auditing principles.

The Review Plan and its implementing procedure will define the means and protocols for communication between the Team and SIMCO. These communication protocols will include identification of the points of contact and method for immediate communication of any non-compliant conditions identified during the Review. This will enable SIMCO to confirm and assess the significance of the condition, as well as address the deficient condition as soon as practical. The Team understands the requirements of the WIPP Hazardous Waste Facility Permit – specifically non-compliant conditions that pose an immediate threat to human health or the environment must be reported to NMED within 24 hours of discovery.

While not included or specified in the approved Triennial Review SOW and Guidelines, our Team recognizes that WIPP and SIMCO operations are routinely assessed by DOE, NMED and EPA organizations. The Team will leverage its WIPP insights and understanding to maintain cognizance of such reviews conducted during the Triennial Review period and incorporate insights or changed conditions within our Review Plan and findings.

Review Activities

Throughout the Review, we will implement the Review Plan in a coordinated manner, supported by regular Team meetings and in coordination and collaboration with the SIMCO Point of Contact (POC). We will provide monthly Progress Reports to the POC on the Review results as it progresses.

We currently estimate one onsite visit for inspections and certain WIPP personnel interviews to occur early in the Review process. We are not proposing that all team members travel to the

WIPP site to minimize costs associated with the onsite portion of the Review. The duration of the onsite visit is estimated to be two weeks; however, this can be revised as necessary, and may be split into two visits, based on actual progress. The Team has estimated that **safety and security training** will occur over the first week of the onsite phase.

The **collection and recording of information** will be accomplished by performing Review activities required to:

- Determine through investigation, examination of records, and interviews if CBFO and SIMCO comply with the terms and conditions of permits and authorizations that stem from the applicable environmental regulations within the Table 1 of the SOW (i.e., RCRA, CAA, CWA, New Mexico SWA, TSCA, EPCRA, NEPA, CERCLA, NMSWA, and FIFRA).
- Determine the robustness of the oversight processes in place for WIPP's environmental programs to ensure the technical content of the implementation program is effectively controlled, including compliance with the applicable DOE Orders.
- Determine through investigation, examination of records, and interviews how robust the oversight processes for environmental programs are.
- Document findings in a written report to be submitted to SIMCO at the conclusion of the Review.
- Perform the Review in accordance with SIMCO SOW guidelines (reference Section 10.0).
- Perform the portions of the Review that apply to SIMCO Security as outlined in DOE Order 470.4B as it pertains to the permit.
- Provide guidance and support to address or close findings and recommendations that have been identified in the Review, as needed and directed by SIMCO.

The Team's Review LOIs will assess the sufficiency of programs and processes that underpin compliance, including employee training, data collection, metrics and trends, issues management, corrective actions, and timeliness and quality of required reporting. Our Team's corporate expertise with the design and review of contractor/performance assurance systems will guide these LOIs to obtain the greatest insights and most comprehensive review possible. Review Team members that review SIMCO Security records and procedures will comply with the requirements of DOE Order 470.4B, "Safeguards and Security Program".

6.3 CRITERIA

Criteria include statutes, regulations, and DOE Orders as well as requirements from procedures and instructions that have been generated from regulations to carry out specific activities in demonstration of compliance.

The Review Team will bring any non-compliant conditions to the attention of the SIMCO POC immediately for the purpose of assessing the significance and to address the deficiency. Conditions

that pose an immediate threat to human health or the environment must be reported by the Permittees within 24 hours of discovery.

6.4 IMPACT OF REVIEW ON CLIENT

Every effort will be made to minimize impact on WIPP operations and personnel. Activities such as interviews and site visits will be scheduled and adhered to.

7.0 PERSONNEL ROLES & RESPONSIBILITIES

7.1 PERSONNEL

The Third Triennial Review Team is made up of seven team members from two contractors - Firewater Associates, LLC (Firewater) and Longenecker & Associates (L&A). Resumes for each Team member have been provided to SIMCO.

Team Member	Affiliation	Email	Phone
Renee Echols	Firewater Associates, LLC Program Manager	rechols@firewaterllc.com	(865) 599-4064
Gregory Edwards	Firewater Associates, LLC SME II	gedwardstn@aol.com	(865) 368-3000
John Wrapp	Firewater Associates, LLC SME II	wrappjohn@aol.com	(865) 250-0731
Kathryn Roberts	Longenecker & Associates SME II	kroberts@la-inc.com	(505) 603-9216
David Wilson	Longenecker & Associates SME II	dwilson@la-inc.com	(803) 730-1678
Brian Hennessey	Longenecker & Associates SME II	Henten2017@gmail.com	(803) 646-9696
Ashley Furman	Longenecker & Associates Engineering Apprentice	afurman@la-inc.com	(919) 888-1991

The Review Team will operate under the direction of the SIMCO POC, Michael Jones.

7.2 ROLES & RESPONSIBILITIES

The Program Manager/Team Lead is responsible for ensuring that personnel are trained and qualified to do their assigned jobs in a manner that achieves performance levels and objectives.

The Team Lead is also responsible for ensuring that required quality assurance indoctrination and training is successfully completed and that additional training needs are identified and met.

The Review Team possess the following capabilities:

- The necessary knowledge and skills to apply auditing principles, procedures, and techniques for undertaking compliance audits.
- The knowledge and ability to conduct reviews in accordance with the SOW and guidelines.
- Expertise and familiarity with major environmental regulations resulting from the following statutes that are included in Table 1 of this Plan:
    - RCRA (and New Mexico implementation through the HWA).
    - CAA (including NESHAPs and the New Mexico Air Quality Act).
    - CWA (and New Mexico implementation through the New Mexico Water Quality Act).
    - Safe Drinking Water Act (and implementation through the New Mexico Drinking Water Requirements).
    - New Mexico Solid Waste Act.
    - Other areas of regulatory expertise may be required, pending scope changes as requested by the NMED.
- Experience with performing environmental compliance reviews.
- Meet the additional requirements and conditions included in the SOW (e.g., meet DOE security requirements to access OUO documentation, access to Controlled Unclassified Information, etc.).

Review Team members are responsible for completing all tasks assigned by the Team Lead in accordance with the Review Plan and this QAP.

7.3 INTERFACE CONTROLS

The importance of the Third Triennial Review necessitates responsive management of the interfaces among the Review Team, SIMCO POC, and DOE representatives (as applicable) to maintain control of contractual work and to facilitate technical information flow. The procedures and plans identified by this QAP and the Review Plan are on file with Firewater.

8.0 REPORTING AND DOCUMENTATION

Documentation will be passed from the Review Team Program Manager to the SIMCO POC. The Program Manager will ensure that documentation meets the SOW requirements, is accurate, and does not breach confidentiality and security restrictions. Records shall be protected against damage, deterioration, or loss. Requirements and responsibilities for records transmittal, distribution, retention, maintenance, and disposition are described below Documents will include Records in paper and/or electronic format and shall include copies of checklists, interview records, and non-Permittee documents that were used during the review. The Review Team shall turn over all security-related working papers, logbooks, write-ups, and materials generated during the Review process or provided by SIMCO.

Compliance checklists and documented findings will be recorded using the templates provided in Attachments B and C of the SOW and used as a basis for compiling the draft Third Triennial Review Report. The Program Manager, Ms. Renee Echols, will have sole responsibility for formally transmitting deliverables to Mr. Michael Jones, SIMCO POC.

9.0 REFERENCES

10 CFR Part 830, Nuclear Safety Management, Subpart A, Quality Assurance Requirements

10 CFR Part 830, Nuclear Safety Management, Subpart B, Safety Basis Requirements

10 CFR Part 830.7, Graded Approach

10 CFR Part 830.122, Quality Assurance Criteria

DOE O 450.2, Integrated Safety Management System

DOE 0 414.1D, Quality Assurance

DOE P 450.4A, Integrated Safety Management Policy, April 25, 2011, U.S. Department of Energy, Washington, D.C.

EM-QA-001, Office of Environmental Management, Subject: EM Quality Assurance Program (QAP), U.S. Department of Energy, Washington, D.C.

NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications and NQA-1a-2008 and NQA-1b-2009 Addenda

DOE O 232.2A, Occurrence Reporting and Processing of Operations Information

DOE O 226.1B, Implementation of Department of Energy Oversight Policy

NQA-1-2008, Non-mandatory Appendix 2A-1, “Guidance on the Qualifications of Inspection and Test Personnel”

Waste Isolation Pilot Plant Project Third Triennial Review Statement of Work, August 2024.

Attachment C
Criteria Checklists

	Third Triennial Review Checklist					
	RCRA Permit Part 1 - Generator Requirements					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Part 1**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	40 CFR §262.11 (20.4.1.300 NMAC) Hazardous Waste Determination	Is there a program in place to determine if a solid waste generated at the WIPP facility is hazardous as defined in 40 CFR Part 261?				
2	40 CFR §262.20 - 23 (20.4.1.300 NMAC) Manifest Requirements	Is there a program in place to assure compliance with the manifest requirements for shipping hazardous waste off-site?				
3	40 CFR §262.30 - 33 (20.4.1.300 NMAC) Packaging Requirements	Is there a program in place to assure EPA and DOT packaging requirements are met before shipping hazardous waste off-site?				
4	40 CFR §262.34(a)(1) – 34(a)(3) (20.4.1.300 NMAC) Accumulation Time	Is there a program in place to assure accumulation times are not exceeded?				
5	40 CFR §262.34(a)(4) (20.4.1.300 NMAC) Compliance with Preparedness and Prevention, Contingency Plan and Emergency Procedures, Training, and Waste Analysis Plan Requirements	Are there programs and procedures to assure compliance with preparedness and prevention and contingency requirements for large quantity generators?				
6	40 CFR §262.34(b) (20.4.1.300 NMAC) Extension of Storage Period	Is there a program in place to extend the 90-day storage period if needed?				
7	40 CFR §262.34(c) (20.4.1.300 NMAC) Restrictions and Requirements	Are there programs and procedures to manage satellite accumulation areas?				
8	40 CFR §262.40 (20.4.1.300 NMAC) Record-Keeping Requirements	Are there procedures to ensure manifests, test results, waste analyses, biennial reports, and exception reports are kept on-site for at least three years.				
9	40 CFR §262.41 (20.4.1.300 NMAC) Generator-Biennial Report	Has the most recent biennial report been submitted to the EPA by March 1 of the most recent even- numbered year?				
10	40 CFR §262.42 (20.4.1.300 NMAC) Exception Reporting	Is there a program in place to ensure exception reporting is done for unreturned manifests?				
11	40 CFR §262.43 (20.4.1.300 NMAC) Additional Reporting	Has the NMED Secretary required additional reporting beyond what's required in the regulations?				

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12	Permit Part 1 Section 1.7.7 Proper Operation and Maintenance	Are systems required to achieve compliance with the conditions of the permit adequately identified and maintained?				
13	Permit Part 1 Section 1.3.1 Permit Modification, Suspension, and Revocation	Has the volume limit for TRU mixed waste (6.2 million cubic feet) increased or the type of waste authorized changed (i.e., other than defense Tru waste) thereby requiring the NMED Secreary to issue a notice of revocation and reissuence?)				
14	Permit Part 1 Section 1.7.7 Proper Operation and Maintenance	Are there sufficient staff and is the training of the operating staff current?				
15	Permit Part 1 Section 1.7.8 Duty to Provide Information	Have the Permittees been asked to provide additional information and has that information been provided in a timely manner?				
16	Permit Part 1 Section 1.7.9.3 Inspection	Has NMED inspected the WIPP facility in the past year?				
17	Permit Part 1 Section 1.7.10.1 Representative Sampling	Have samples representative of the monitored activity been taken as prescribed?				
18	Permit Part 1 Section 1.7.10.2 Record Retention	Is there a compliant records retention program?				
19	Permit Part 1 Section 1.7.10.2 Record Retention	Are the waste minimization certification records and records of all data used to complete the application for the RCRA Permit retained for a period of at least 3 years from the date of certification or application.				
20	Permit Part 1 Section 1.7.10.3 Monitoring Records	Do records of monitoring information contain the required information?				
21	Permit Part 1 Section 1.7.11.1 Reporting Planned Changes	Have the Permittees posted links to planned change notification transmittal letters?				
22	Permit Part 1 Section 1.7.11.1 Reporting Planned Changes	Have the Permittees informed those on the e-mail notification list of planned change notification transmittal letters?				
23	Permit Part 1 Section 1.7.11.2 Reporting Anticipated Noncompliance	Have the Permittees posted links to planned change notification transmittal letters?				
24	Permit Part 1 Section 1.7.11.2 Reporting Anticipated Noncompliance	Have the Permittees informed those on the e-mail notification list of planned change notification transmittal letters?				

	Third Triennial Review Checklist					
	RCRA Permit Part 1 - Generator Requirements					
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	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
25	Permit Part 1 Section 1.7.11.2 Reporting and Anticipated Noncompliance	Has TRU Mixed Waste been stored or disposed of in any modified portion of the facility? If so, had the conditions specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.30(l)(2)) been satisfied?				
26	Permit Part 1 Section 1.7.12 Transfer of Permits	Have the requirements been met related to the transfer of the Permit to SIMCO?				
27	Permit Part 1 Section 1.7.13 24 Hour and Subsequent Reporting	Do the Permittees have processes in place to assure compliance with the 24 hour and subsequent reporting permit requirements?				
28	Permit Part 1 Section 1.7.13.4 Contingency Plan Implementation	Have the Permittees implemented the Contingency Plan in the past year and have they complied with the reporting requirements of Attachment D?				
29	Permit Part 1 Section 1.7.14 Other Noncompliance	Do the Permittees have a process in place to assure the reporting of other noncompliances in the annual monitoring report?				
30	Permit Part 1 Section 1.7.14 Other Noncompliance	Have other noncompliances been identified and reported?				
31	Permit Part 1 Section 1.7.15	Do the Permittees have a process in place to assure identification submittal, and posting of information as required?				
32	Permit Part 1 Section 1.9 Signatory Requirement	Do the Permittees have a process in place to assure documents are properly signed and certified?				
33	Permit Part 1 Section 1.10.1 Information Submittal	Do the Permittees have a process in place to assure proper information submittal?				
34	Permit Part 1 Section 1.11 Public E-Mail Notification List	Do the Permittees have a process in place to assure compliance with the Extension of Time requirements?				

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	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
35	Permit Part 1 Section 1.13 Documents to be Maintained at the Facility	Do the Permittees have a process in place to assure compliance with the Public E-Mail Notification requirements?				
36	Permit Part 1 Section 1.14 Information Repository	Are the listed documents (including amendments, revisions, and modifications) maintained at the WIPP facility and are there processes in place to assure maintenance?				
37	Permit Part 1 Section 1.14 Information Repository	Are the Permittees in compliance with the Information Repository requirements?				
38	Permit Part 1 Section 1.15 Community Relations Plan	Do the Permittees have a process in place to assure compliance with the Community Relations Plan requirements?				
39	Permit Part 1 Section 1.15 Community Relations Plan	Are the Permittees in compliance with the Community Relations Plan requirements?				
40	Permit Part 1 Section 1.15.2(7) Contents of Community Relations Plan	Have Permittees conducted Community Forum public meetings three times per year in compliance with the community Relations Plan requirements in the 2023 Permit renewal?				

	Third Triennial Review Checklist					
	RCRA Permit Part 2 - General Facility Conditions					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Part 2**				
	Citation	Required Program				
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Part 2, Section 2.2.2 - Required Notification of Off-Site Sources	Have the Permittees provided the required notice of off-site sources of TRU mixed waste as required by 24.4.1.500 NMAC (incorporating 40 CFR § 264.12(b))?				
2	Permit Part 2, Section 2.3.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.13	Do the Permittees have processes to identify and characterize derived waste?				
3	Permit Part 2, Section 2.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.73(b)(9)	Do the Permittees have the required waste minimization program in place?				
4	Permit Part 2, Section 2.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.73(b)(9)	Have the Permittees submitted the required waste minimization report to the NMED?				
5	Permit Part 2, Section 2.6.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(1)))	Is there a surveillance system comprised of security officers that provide protection 24 hours per day, every day?				
6	Permit Part 2, Section 2.6.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(1)))	Do security officers continuously monitor and control personnel, vehicle, and material access/egress to the Property Protection Area (PPA)?				
7	Permit Part 2, Section 2.6.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(1)))	During non-operational hours, do security officers conduct documented security patrols outside of the PPA, at a minimum rate of two per 12-hour shift?				
8	Permit Part 2, Section 2.6.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(1)))	Whenever scheduled security patrols cannot be made, is the reason for missing the patrol documented in the security logbook?				
9	Permit Part 2, Section 2.6.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(2)(i)))	Is the PPA enclosed by a permanent seven ft high chain-link fence topped by three strands of barbed wire, for a total height of eight ft.?				

	Third Triennial Review Checklist					
	RCRA Permit Part 2 - General Facility Conditions					
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	Citation	Required Program				
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
10	Permit Part 2, Section 2.6.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(2)(i)))	Does the fence completely surround all major surface structures on the active portion of the facility?				
11	Permit Part 2, Section 2.6.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(2)(i)))	Is the fence inspected as specified in Permit Attachment E to ensure it remains in good repair?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
12	Permit Part 2, Section 2.6.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(2)(ii)))	Do the Permittees control entry to the active portion of the facility at all times?				
13	Permit Part 2, Section 2.6.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(2)(ii)))	Is entry into the PPA, through controlled gates and doors?				
14	Permit Part 2, Section 2.6.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(b)(2)(ii)))	Are only properly identified and authorized persons, vehicles, and property allowed entrance to and exit from the active portion of the facility?				
15	Permit Part 2, Section 2.6.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(c)))	Have the Permittees posted “No Trespassing” signs and “Danger: Authorized Personnel Only” signs in English and Spanish at approximately 50 ft intervals on the permanent chain-link fence surrounding the PPA.?				
16	Permit Part 2, Section 2.6.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(c)))	Are security signs and traffic control signs located on controlled gates?				
17	Permit Part 2, Section 2.6.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.14(c)))	Are signs legible from a distance of 25 ft and visible from any approach to the facility?				

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	Citation	Required Program				
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
18	Permit Part 2, Section 2.7.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b))	Have the Permittees implemented the inspection schedule specified in Permit Attachment E to detect any malfunctions and deteriorations, operator errors, and discharges?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
19	Permit Part 2, Section 2.7.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b))	Do the Permittees use the inspection logbooks and forms as specified in Permit Attachment E?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
20	Permit Part 2, Section 2.7.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b))	Are original copies of these completed forms maintained in the Operating Record?				See Observation/Recommendation 2 - RCRA Operating Record
21	Permit Part 2, Section 2.7.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b))	Do the records include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
22	Permit Part 2, Section 2.7.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b))	Do the Permittees inspect monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment at the frequency specified in Tables E-1 and E-2 of Permit Attachment E?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
23	Permit Part 2, Section 2.7.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(c))	Do the Permittees have a program to remedy any deterioration or malfunction of equipment or structures which an inspection reveals?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
24	Permit Part 2, Section 2.7.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(d) and 264.73(b)(5))	Are the Permittees maintaining inspection logbooks and forms in the operating record until closure?				See Observation/Recommendation 2 - RCRA Operating Record
25	Permit Part 2, Section 2.8.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.16)).	Have the Permittees implemented a personnel training program that includes the requirements specified in Permit Attachment F?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment F – Facility Personnel Permit Training Program

	Third Triennial Review Checklist					
	RCRA Permit Part 2 - General Facility Conditions					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Part 2**				
	Citation	Required Program				
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
26	Permit Part 2, Section 2.8.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.16)).	Are Permittees' employees that are involved in the management of TRU mixed waste trained in procedures relevant to the positions in which they are employed, as specified in Permit Attachment F1?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment F – Facility Personnel Permit Training Program
27	Permit Part 2, Section 2.8.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.16(d) and (e))).	Do the Permittees maintain training documents and records, as required by the Permit?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment F – Facility Personnel Permit Training Program
28	Permit Part 2, Section 2.8.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.16)).	Is refresher training completed by the end of the month of the anniversary date when the training was previously completed?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment F – Facility Personnel Permit Training Program
29	Permit Part 2, Section 2.9 (20.4.1.500 NMAC (incorporating 40 CFR § 264.17)).	Do the Permittees have programs in place to assure no ignitable, corrosive, reactive, or incompatible wastes are managed, stored or disposed at the WIPP facility within the permitted units?				
30	Permit Part 2, Section 2.10.1.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(a))).	Do the Permittees have an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
31	Permit Part 2, Section 2.10.1.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(a))).	Do the Permittees internal communication systems include two-way communication by the public address (PA) system and its intercom phones, mobile phones, mine phones,-facility radio base stations, and portable two-way radios.?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
32	Permit Part 2, Section 2.10.1.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(a))).	Does the Permittees internal communication systems include local and facility-wide alarm systems?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
33	Permit Part 2, Section 2.10.1.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(b))).	Do the Permittees have a communications device or system capable of summoning outside agencies for emergency assistance?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms

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	RCRA Permit Part 2 - General Facility Conditions					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Part 2**				
	Citation	Required Program				
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
34	Permit Part 2, Section 2.10.1.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(b))).	Do the external communication systems include the commercial telephone system and two-way radios?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
35	Permit Part 2, Section 2.10.1.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(c))).	Do the Permittees have portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment as described in Permit Attachment D?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
36	Permit Part 2, Section 2.10.1.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(d))).	Do the Permittees have water at adequate volume and pressure to supply water-hose streams, foam- producing equipment, automatic sprinklers, or water-spray systems?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
37	Permit Part 2, Section 2.10.1.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32(d))).	Does the permittees facility water system consist of water furnished by the City of Carlsbad capable of providing water at a rate of 6,000 gallons per minute; two water storage tanks, one 180,000 gallon capacity tank for use by the fire-water system and a second tank with a 100,000-gallon reserve; dedicated fire water pumps rated at 1,500 gallons per minute at 125 pounds per square inch; and a wet-pipe sprinkler system connected to surface buildings as described in Permit Attachment D?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
38	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Do the Permittees maintain dedicated batteries designed to supply power to a fully loaded uninterruptible power system (UPS) for 30 minutes?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
39	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are the Permittees maintaining the back-up diesel generators?				
40	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
41	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				

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42	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
43	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
44	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
45	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
46	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
47	Permit Part 2, Section 2.10.1.5 (20.4.1.500 NMAC (incorporating 40 CFR § 264.32)).	Are there procedures in place to implement the following in the event of a loss of electrical power?				
48	Permit Part 2, Section 2.10.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.33)).	Do the Permittees test and maintain the equipment specified in Permit Section 2.10.1, as necessary, to assure its proper operation in time of emergency, as specified in Permit Attachment E?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
49	Permit Part 2, Section 2.10.3 (20.4.1.500 NMAC (incorporating 40 CFR § 264.34)).	Do the Permittees maintain access to the communications and alarm systems specified in Permit Section 2.10.1?				
50	Permit Part 2, Section 2.10.4 (20.4.1.500 NMAC (incorporating 40 CFR § 264.35)).	Do the Permittees maintain aisle space in the WHB Unit and Parking Area Unit to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms

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51	Permit Part 2, Section 2.10.5.1 (20.4.1.500 NMAC (incorporating 40 CFR § 264.37)(a) and 264.57(c))).	Do the Permittees maintain preparedness and prevention arrangements with state and local authorities, other mining operations, contractors, and other governmental agencies specified in Permit Attachment D, Section D-6?				
52	Permit Part 2, Section 2.10.5.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.37)(a))).	Do the Permittees arrangements include the elements required by 20.4.1.500 NMAC (incorporating 40 CFR § 264.37)(a))?				
53	Permit Part 2, Section 2.10.5.2 (20.4.1.500 NMAC (incorporating 40 CFR § 264.37)(a))).	Are copies and descriptions of the Permittees agreements with offsite cooperating agencies maintained at the facility in the operating record?				See Observation/Recommendation 2 - RCRA Operating Record
54	Permit Part 2, Section 2.10.6	Have the Permittees developed and implemented Live Fire Extinguisher Training and Refresher and is it mandatory for unescorted access to the underground?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment F – Facility Personnel Permit Training Program
55	Permit Part 2, Section 2.12.1 (20.4.1.500 NMAC (incorporating 40 CFR §264.51(b)))	Do the Permittees have procedures in place to immediately implement the Contingency Plan as specified in Permit Attachment D whenever there is a fire, explosion, or release of mixed or hazardous waste or hazardous waste constituents which could threaten human health or the environment, as required by.				
56	Permit Part 2, Section 2.12.2 (20.4.1.500 NMAC (incorporating 40 CFR §264.53))	Do the Permittees maintain copies of the Contingency Plan and all revisions and amendments to the Contingency Plan?				
57	Permit Part 2, Section 2.12.2 (20.4.1.500 NMAC (incorporating 40 CFR §264.53(b)))	Do the Permittees provide copies of the current Contingency Plan to the Secretary and all entities with which the Permittees have agreements?				
58	Permit Part 2, Section 2.12.2 (20.4.1.500 NMAC (incorporating 40 CFR §264.53(b)))	Do the Permittees maintain at least one current paper copy of the Contingency Plan at the facility in a location readily accessible to the Emergency Coordinator?				

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59	Permit Part 2, Section 2.12.3 (20.4.1.500 NMAC (incorporating 40 CFR §264.54))	Do the Permittees have a process in place to review and immediately amend, if necessary, the Contingency Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.54)?				
60	Permit Part 2, Section 2.12.4 (20.4.1.500 NMAC (incorporating 40 CFR §264.55))	Do the Permittees assure that an Emergency Coordinator as specified in Table D-1 of Permit Attachment D is available at all times in case of an emergency?				
61	Permit Part 2, Section 2.12.4 (20.4.1.500 NMAC (incorporating 40 CFR §264.55))	Is the Permittees' Emergency Coordinator thoroughly familiar with the Contingency Plan?				
62	Permit Part 2, Section 2.12.4 (20.4.1.500 NMAC (incorporating 40 CFR §264.55))	Does the Permittees' Emergency Coordinator have the authority to commit the resources needed to implement the Contingency Plan?				
63	Permit Part 2, Section 2.12.4 (20.4.1.500 NMAC (incorporating 40 CFR §264.56))	In the event of an imminent or actual emergency, does the Emergency Coordinator implement the requirements Contingency Plan.				
64	Permit Part 2, Section 2.13 (20.4.1.500 NMAC (incorporating 40 CFR §264.71 and 72))	Do the Permittees comply with the manifest requirements?				
65	Permit Part 2, Section 2.13 (20.4.1.500 NMAC (incorporating 40 CFR §264.71 and 72))	Do the Permittees have a process in place to report the required notification of DOT non-compliance that is ORPS reportable?				
66	Permit Part 2, Section 2.14.1 (20.4.1.500 NMAC (incorporating 40 CFR §§264.73(a)))	Do the Permittees maintain a written operating record at the facility?				See Observation/Recommendation 2 - RCRA Operating Record

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67	Permit Part 2, Section 2.14.1 (20.4.1.500 NMAC (incorporating 40 CFR §§264.73(b))	Does the Permittees' written operating record include all information required under 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)) subject to the limitations on the storage of classified information				See Observation/Recommendation 2 - RCRA Operating Record
68	Permit Part 2, Section 2.14.1 (20.4.1.500 NMAC (incorporating 40 CFR §§264.73(a)))	For those portions of the Operating Record that are electronic, is the record unalterable by the user and capable of producing a paper copy?				See Observation/Recommendation 2 - RCRA Operating Record
69	Permit Part 2, Section 2.14.1 (20.4.1.500 NMAC (incorporating 40 CFR §§264.73(a)))	Do the Permittees have a process in place to maintain the operating record until closure of the facility?				See Observation/Recommendation 2 - RCRA Operating Record
70	Permit Part 2, Section 2.14.2 (20.4.1.500 NMAC (incorporating 40 CFR §§264.75))	Do the Permittees submit to the Secretary a biennial report?				
71	Permit Part 2, Section 2.14.3 Repository Siting Annual Report	Have the Permittees included information related to the siting process for another repository in the 2023 and 2024 Annual Reports?				
72	40 CFR §264.76 (20.4.1.500 NMAC) Unmanifested Waste Report	Have the Permittees handled unmanifested waste correctly?				
73	40 CFR §264.77 (20.4.1.500 NMAC) Additional Reports	Have the Permittees been required to submit additional reports to the NMED?				
74	40 CFR §264.77 (20.4.1.500 NMAC) Applicability of Releases from Solid Waste Management Units	Is a system in place for groundwater monitoring of the surface impoundment?				

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	RCRA Permit Part 3 - Container Storage					
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	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Permit Part 3**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Part 3, Section 3.1 – Designated Container Storage Units	Is there a program in place to ensure that TRU mixed waste containers are only stored in designated container storage units?				
2	Permit Part 3, Section 3.1.1.1 -Storage Containers	Is there a program in place to ensure only permitted containers are used for storage of TRU mixed waste in the WHB?				
3	Permit Part 3, Section 3.1.1.2 - Storage Locations and Quantities	Is there a program in place to ensure containers are stored in the authorized areas of the WHB?				
4	Permit Part 3, Section 3.1.1.2 - Storage Locations and Quantities	Is there a program in place to ensure containers do not exceed the authorized quantities when stored in the WHB?				
5	Permit Part 3, Section 3.1.1.3 - Use of CH Bay Surge Storage	Is there a program in place to ensure compliance with surge storage specification in Attachment A1, Section A1-1c(1)?				
6	Permit Part 3, Section 3.1.1.4 - Notification of CH Bay Surge Storage Use	Is there a program in place to ensure the NMED is informed when Surge Storage is used and to justify its use?				
7	Permit Part 3, Section 3.1.1.4 - Notification of CH Bay Surge Storage Use	Is there a program in place to ensure a link to the notice of CH Bay Surge Storage Area use is posted to the WIPP Home Page?				
8	Permit Part 3, Section 3.1.1.4 - Notification of CH Bay Surge Storage Use	Is there a program in place to ensure the e-mail notifications requirements for Surge Storage Use are met?				
9	Permit Part 3, Section 3.1.1.4 - Notification of CH Bay Surge Storage Use	Is there a program in place to ensure the annual report to the NMED regarding surge storage use is submitted timely?				
10	Permit Part 3, Section 3.1.1.5 - Storage on Pallets	Is there a program in place to ensure storage of TRU mixed waste unloaded from Contact-Handled Packages in the WHB is on pallets as applicable?				
11	Permit Part 3, Section 3.1.1.6 - Storage of Derived Waste	Is there a program in place to ensure derived waste is stored in accordance with the Permit?				
12	Permit Part 3, Section 3.1.1.7 - CH TRU Mixed Waste Storage Time Limit	Is there a program in place to ensure CH TRU waste is not stored for longer than 60 days in the WHB?				

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	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Permit Part 3**				
	Citation	Required Program				Notes/Comments
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13	Permit Part 3, Section 3.1.1.8 - Minimum Aisle Space	Is there a program in place to ensure minimum aisle space of 44 inches is maintained between facility pallets or casks in storage areas?				
14	Permit Part 3, Section 3.1.2 - Parking Area Container Storage Unit	Is there a program in place to ensure the Permittees manage the Parking Area Container Storage Unit in compliance with the specifications in Permit Attachment A1, Figure A1-2?				
15	Permit Part 3, Section 3.1.2.1 - Storage Containers	Is there a program in place to ensure only permitted containers are used for storage of TRU mixed waste in sealed CH and RH Packages Described in Permit Attachment A1?				
16	Permit Part 3, Section 3.1.2.2 - Storage Locations and Quantities	Is there a program in place to ensure RH and CH TRU mixed waste packages are stored in the authorized areas of the PAU?				
17	Permit Part 3, Section 3.1.2.3 - Use of Parking Area Surge Storage	Is there a program in place to ensure compliance with surge storage specifications in Attachment A1, Section A1-1c(2)?				
18	Permit Part 3, Section 3.1.2.4 - Notification of Parking Area Surge Storage Use	Is there a program in place to ensure compliance with surge storage notification requirements?				
19	Permit Part 3, Section 3.1.2.5 - Prohibition on Opening Containers	Do the Permittees keep containers of off-site waste closed at all times while in the PAU?				
20	Permit Part 3, Section 3.1.2.6 - Storage Time Limits	Do the Permittees have a process in place to prevent exceeding storage times in the PAU?				
21	Permit Part 3, Section 3.1.2.7 - Minimum Aisle Space	Is there a program in place to ensure minimum spacing of 4 feet maintained between loaded CH or RH packages in the PAU?				
22	Permit Part 3, Section 3.3, 20.4.1.500 (incorporating 40 CFR §264.171)	Is there a program in place to ensure waste containers that are not in "good condition" are managed in accordance with the Permit and compliance with 40 CFR 264.171?				
23	Permit Part 3, Section 3.3.1 - Acceptable Storage Containers	Is there a program in place to ensure TRU mixed waste managed in the WHB and PAU are in approved containers?				

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	Citation	Required Program				Notes/Comments
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24	Permit Part 3, Section 3.3.1.8 Shielded Container	Are shielded containers managed as CH TRU mixed waste and counted towards the RH TRU mixed waste volume limits?				
25	Permit Part 3, Section 3.3.2 - Derived Waste Containers	Is there a program in place to ensure the Permittees only store derived waste in approved containers in the WHB?				
26	Permit Part 3, Section 3.5, 20.4.1.500 (incorporating 40 CFR §264.173)	Is there a program in place to ensure that containers remain closed during storage (except when adding waste to derived waste containers) in accordance with 40 CFR 264.173?				
27	Permit Part 3, Section 3.6, 20.4.1.500 (incorporating 40 CFR §264.175)	Is there a program in place to ensure that secondary containment systems are maintained for containers in the WHB and Parking Area container storage units in accordance with 40 CFR 264.175?				
28	Permit Part 3, Section 3.7, 20.4.1.500 (incorporating 40 CFR §264.174)	Is there a program and/or procedure in place to inspect the WHB and Parking Area container storage units at least weekly in accordance with 40 CFR 264.174?				
29	Permit Part 3, Section 3.8-Recordkeeping	Is there a program and/or procedure in place to ensure that results of waste analysis are placed in the operating record?				

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	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Part 4**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Part 4, Section 4.1 – Designated Disposal Units	Is there a program in place to ensure that waste is disposed of in appropriate locations?				
2	Permit Part 4, Section 4.1.1.2 - Disposal Locations and Quantities	Is there a program in place to ensure that the maximum TRU mixed waste capacity allowed for disposal in each Underground HWDUs is not exceeded?				
3	Permit Part 4, Section 4.2.1 -- Permitted Waste	Is there a program/procedure in place to ensure that only permitted waste is disposed in the Underground HWDUs?				
4	Permit Part 4, Section 4.2.1.4 -- Priortization of Risk	Do the Permittees have a procedure/process for prepaing the required certification? Have recent certifications been submitted, if required.				
5	Permit Part 4, Section 4.2.1.5 -- Legacy TRU Waste Disposal Plan	Have Permitees developed a Plan, submitted it to the Secretary, and solicited public input within the prescribed time limits?				
6	Permit Part 4, Section 4.2.2 -- Prohibited Waste	Is there a program/procedure in place to ensure that prohibited waste is not disposed in the Underground HWDUs?				
7	Permit Part 4, Section 4.2.2.2 -- Specific Prohibition	Is there a program/procedure in place to ensure that non-mixed TRU waste is adequately characterized prior to disposal in an Underground HWDU?				
8	Permit Part 4, Section 4.3.2 – Condition of Containers	Is there a program/procedure in place to ensure that TRU mixed waste containers are in good condition prior to disposal in the Underground HWDUs?				
9	Permit Part 4, Section 4.4.1 – Room-Based Limits	Is there a program/procedure in place to ensure that the limits in Table 4.4.1 are not exceeded in each closed room of an active panel?				
10	Permit Part 4, Section 4.4.2 – Determination of VOC Room-Based Limits	Is there a program in place to ensure that VOC concentrations and emission rate limits [such limits are not in Section 4.4.1] in Permit Section 4.4.1 are confirmed?				
11	Permit Part 4, Section 4.5.1-4.5.2 20.4.1.500 NMAC (incorporating 40 CFR §264.601)	Is there a program in place to ensure each Underground HWDU is constructed in conformance with the requirements in Permit Attachment A2?				

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12	Permit Part 4, Section 4.5.2.2 - Notification Requirements	Is there a program in place to ensure the NMED is notified 30 calendar days prior to beginning construction of a new HWDU? Is the notification posted for the most recent Panel (Panel 11)?				
13	Permit Part 4, Section 4.5.3.1 – Underground Traffic Flow	Is there a program/procedure in place separating the ventilation and traffic flow areas in the underground TRU mixed waste handling and disposal areas from the ventilation and traffic flow areas for mining and construction equipment (north of S-1600)?				
14	Permit Part 4, Section 4.5.3.1 – Underground Traffic Flow	Is there a program/procedure in place designating routes for the traffic flow of TRU mixed waste handling equipment and construction equipment?				
15	Permit Part 4, Section 4.5.3.1 – Underground Traffic Flow	Are the designated routes recorded on a mine map posted in a location where persons entering the underground can read it?				
16	Permit Part 4, Section 4.5.3.1 – Underground Traffic Flow	Are old copies of the mine map in the facility files?				
17	Permit Part 4, Section 4.5.3.2 – Ventilation	Is there a program/procedure in place to ensure that a minimum active room ventilation rate of 35,000 standard ft3/min is maintained during waste disposal activities and when workers are present in the room as specified in Permit Attachment A2, Section A2-2a(3)?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment O – WIPP Mine Ventilation Monitoring Plan
18	Permit Part 4, Section 4.5.3.3 – Ventilation Barriers	Is there a program/procedure in place requiring construction of ventilation barricades in active Underground HWDUs to restrict the flow of mine ventilation air through full disposal rooms as specified in Permit Attachment A2, Section A2-2a(3)?				
19	Permit Part 4, Section 4.6.1- Geomechanical Monitoring (incorporating 40 CFR § 264.602)	Is there a program/procedure in place requiring Geomechanical Monitoring as specified in Permit Attachment A2, Section A2-5b(2)?				
20	Permit Part 4, Section 4.6.1.2- Reporting Requirements	Is there a program/procedure in place requiring submittal of an annual report (in October) of the Geomechanical Monitoring program to NMED?				

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21	Permit Part 4, Section 4.6.1.3- Notification of Adverse Conditions	Is there a procedure in place ensuring that notification to NMED is made when the geomechanical monitoring system data identifies a trend towards unstable conditions?				
22	Permit Part 4, Section 4.6.1.3- Reporting Requirements	Is there a program/procedure in place to assure posting of a link to the adverse condition transmittal letter to the WIPP Home page and inform those on the e-mail notification list?				
23	Permit Part 4, Section 4.6.2.1 – Implementation of Repository VOC Monitoring	Is there a Repository VOC monitoring program in place?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan
24	Permit Part 4, Section 4.6.2.2 – Reporting Requirements	Do the Permittees provide semi-annual reports in April and October?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan
25	Permit Part 4, Section 4.6.2.3 – Notification Requirements	Is there a program in place to assure notification of a VOC exceedance to the NMED?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan
26	Permit Part 4, Section 4.6.2.3 – Notification Requirements	Is there a program/procedure in place to assure the Permittees review TICS and the risk factors in Table 4.6.2.3 annually?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan
27	Permit Part 4, Section 4.6.2.4 – Remedial Action	Is there a program in place to assure remedial action is taken if there is a VOC exceedance requiring action?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan

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28	Permit Part 4, Section 4.6.3.1 – Disposal Room Volatile Organic Compound Monitoring	Is there a Disposal Room VOC monitoring Program in place?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan
29	Permit Part 4, Section 4.6.3.2 – Notification Requirements	Is there a program in place to assure notification of a VOC exceedance to the NMED?				
30	Permit Part 4, Section 4.6.3.3 – Remedial Action	Is there a program in place to assure remedial action is taken if there is a VOC exceedance requiring action?				
31	Permit Part 4, Section 4.6.4.1 –Implementation of Mine Ventilation Rate Monitoring Plan	Is the Mine Ventilation Rate Monitoring Plan required by Attachment O in place?				
32	Permit Part 4, Section 4.6.4.2 – Reporting Requirements	Is there a program in place to assure that the Permittees submit the required report in October?				
33	Permit Part 4, Section 4.6.4.3 – Notification Requirements	Is there a program in place to assure that the Permittees evaluate the minimum active room ventilation rate on a monthly basis and submit the required notification in the annual report?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment N – VOC Monitoring Plan
34	Permit Part 4, Section 4.7 – Inspection Schedules and Procedures	Is there a program in place ensuring that Underground HWDUs are inspected at least weekly to detect malfunctions, signs of deterioration, operator errors, discharges, or any other factors which have caused or may cause a release of hazardous waste or hazardous waste constituents or may compromise the ability of any HWDU to comply with the environmental performance standards?				
35	Permit Part 4, Section 4.8.1 – Recordkeeping-Underground HWDU Location Map	Do the Permittees have an up to date (i.e., within the last 6 months) map of the exact location and dimensions of each Underground HWDU?				

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36	Permit Part 4, Section 4.8.2 – Recordkeeping-Disposal Waste Type and Location	Do the Permittees have a Record as well as a map identifying the types and quantities of TRU mixed waste in each Underground HWDU and the disposal location of each container or container assembly in accordance with the requirements in this Permit section?				
37	Permit Part 4, Section 4.8.3 – Recordkeeping-Ventilation	Do the Permittees have a Record identifying non-conformances to the ventilation rate specified in Permit section 4.5.3.2?				

	Third Triennial Review Checklist					
	RCRA Permit Part 5 - Groundwater Detection Monitoring					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Part 5**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Part 5, Section 5.1 - 20.4.1.500 NMAC (incorporating 40 CFR §§264.97 and 264.98)	Have the Permittees established a groundwater detection monitoring program in accordance with 40 CFR §§264.97 and 264.98?				
2	Permit Part 5, Section 5.1, 20.4.1.500 NMAC (incorporating 40 CFR §264.601(a))	Does the detection monitoring program (DMP) demonstrate compliance with the environmental performance standard for the Underground HWDUs in accordance with §264.601(a))?				
3	Permit Part 5, Section 5.2, 20.4.1.500 NMAC (incorporating 40 CFR §§264.98 and 264.601)	Do the Permittees conduct the DMP at the detection monitoring wells (DMW) specified in Table 5.3.1?				
4	Permit Part 5, Section 5.3, 20.4.1.500 NMAC (incorporating 40 CFR §264 Subpart F)	Is there a program in place ensuring that the DMP is maintained in compliance with 40 CFR §264 Subpart F?				
5	Permit Part 5, Section 5.3.1, 20.4.1.500 NMAC (incorporating 40 CFR §264.97(a) and §264.98(b))	Is there a program in place ensuring that the DMWs are maintained at the locations identified in Attachment L?				
6	Permit Part 5, Section 5.3.2, 20.4.1.500 NMAC (incorporating 40 CFR §264.97(c) and §264.98(b))	Is there a program in place ensuring that the DMWs are maintained in accordance with Attachment L?				
7	Permit Part 5, Section 5.4, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(a))	Is there a program in place ensuring that the DMWs are sampled for the indicator parameters and hazardous constituents identified in Tables 5.4a & 5.4b?				
8	Permit Part 5, Section 5.5.1 Sample Collection Procedures incorporating 20.4.1.500 NMAC (incorporating 40 CFR §§264.97(g)(2), 264.98(d), and 264.601(a))	Do the Permittees collect DMP samples and DMP sample duplicates as specified in Permit Attachment L. Section L-4c?				
9	Permit Part 5, Section 5.5.2 - Sample Preservation and Shipment Procedures	Do the Permittees preserve and ship DMP samples as specified in Permit Attachment L. Section L-4c(2)(iv)?				
10	Permit Part 5, Section 5.5.3 - analytical Procedures	Do the Permittees analyze DMP samples using the procedures specified in Permit Attachment L. Section L-4c(3)?				
11	Permit Part 5, Section 5.5.4 - Chain of Custody Procedures	Do the Permittees track and control DMP samples using chain of custody procedures specified in Permit Attachment L. Section L-4c(2)(v)?				

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	RCRA Permit Part 5 - Groundwater Detection Monitoring					
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12	Permit Part 5, Sections 5.7.1, 20.4.1.500 NMAC (incorporating 40 CFR §264.97(f))	Is there a program/procedure in place to ensure that the groundwater surface elevation is determined at each DMW each time groundwater is sampled ?				
13	Permit Part 5, Sections 5.7.2, 20.4.1.500 NMAC (incorporating 40 CFR §264.97(f))	Is there a program/procedure in place to ensure that the groundwater surface elevation is determined at each well completed in the Culebra monthly?				
14	Permit Part 5, Section 5.8, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(e))	Is there a program/procedure in place to ensure that the groundwater flow rate and direction in the Culebra Member of the Rustler Formation is determined at least annually?				
15	Permit Part 5, Section 5.9,1 20.4.1.500 NMAC (incorporating 40 CFR §264.97(h)) & §264.97(i))	Is there a program/procedure in place to ensure that the statistical analysis methods identified in Permit Attachment L are used to evaluate DMP data for each hazardous constituent?				
16	Permit Part 5, Section 5.9.2, 20.4.1.500 NMAC (incorporating 40 CFR §264.90(c))	Is there a program/procedure in place to ensure that statistical tests are performed on DMW samples to determine whether there is statistically significant evidence of contamination for hazardous constituents listed in Permit Table 5.4.b?				
17	Permit Part 5, Section 5.9.3, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(f))	Is there a program/procedure in place documenting the methodology for determining whether statistically significant evidence exists (i.e., comparison of groundwater quality to background values)?				
18	Permit Part 5, Section 5.9.4, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(f)(2))	Is there a program/procedure in place ensuring that data evaluations are performed within 120 calendar days?				
19	Permit Part 5, Section 5.10.1, 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(6)) - Operating Record Requirements	Is there a program/procedure in place ensuring that DMP monitoring, testing and analytical data are posted in the Operating Record?				

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	RCRA Permit Part 5 - Groundwater Detection Monitoring					
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20	Permit Part 5, Section 5.10.2.1, 20.4.1.500 NMAC (incorporating 40 CFR §264.97(j)) - Data Evaluation Results	Is there a program/procedure in place ensuring that the Data Evaluation results are reported to NMED by November 30th each year?				
21	Permit Part 5, Section 5.10.2.2 – Groundwater Surface Elevation Results	Is there a program/procedure in place ensuring that the Groundwater Surface Elevation results are reported to NMED semiannually by May 31st and November 30th?				
22	Permit Part 5, Section 5.10.2.3 – Groundwater Flow Results	Is there a program/procedure in place ensuring that the Groundwater Flow results are reported to NMED by November 30th each year?				
23	Permit Part 5, Section 5.10.3, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g))	Is there a program/procedure in place ensuring that if statistically significant evidence demonstrates there is contamination, the Permittees comply with all notification, sampling and reporting requirements in Permit Section 5.10.3?				
24	Permit Part 5, Section 5.10.3.1, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(1)) - Notification	Is there a program/procedure in place ensuring that the NMED is notified if statistically significant evidence demonstrates there is contamination requirements in Permit Section 5.10.3?				
25	Permit Part 5, Section 5.10.3.2, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(2)) - Appendix IX Sampling	Is there a program/procedure in place ensuring Appendix IX sampling for DMW for which there is evidence of contamination?				
26	Permit Part 5, Section 5.10.3.3, 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(3)) -Verification Sampling	Is there a program/procedure in place ensuring re-sampling for DMW for which there is evidence of contamination?				
27	Permit Part 5, Section 5.10.4 – Demonstration of Outside Contamination	Is there a program/procedure in place ensuring that if statistically significant evidence demonstrates there is contamination from an off-site source, the Permittees comply with notification, sampling and reporting requirements in Permit Section 5.10.4?				

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	RCRA Permit Part 6 through 8 - Closure, Post-Closure and Corrective Action					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Parts 6 through 8**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Part 6, Section 6.4 Notification of Closure (20.4.1.500 NMAC (incorporating 40 CFR § 264.112(d) and 40 CFR § 264.601))	Is there documentation of 60 calendar day written notification to the Secretary prior to the start of closure of each Underground HDWU, and are there links on the WIPP Home Page to those notices and documentation of notification of those on the e-mail notification list?				
2	Permit Part 6, Section 6.5.1 Partial Closure (20.4.1.500 NMAC (incorporating 40 CFR § 264.113))	Does documentation support closure of completed Underground HDWU's in accordance with the requirements of Permit Attachment G?				
3	Permit Part 6 Section 6.5.1 Partial Closure	Does documentation support completion of decontamination and decommissioning of surface equipment, structures, and soils in accordance with the requirements of Permit Attachment G?				
4	Permit Part 6 Section 6.6 DISPOSAL OR DECONTAMINATION OF EQUIPMENT, STRUCTURES, AND SOILS	As part of either partial closure or final facility closure, does documentation support completion of decontamination or disposal of contaminated equipment, structures, and soils, as specified in Permit Attachment G?				
5	Permit Part 6, Section 6.7 Certification of Closure (20.4.1.500 NMAC (incorporating 40 CFR § 264.111 and 40 CFR § 264.178))	Is there documentation of the 60 calendar day written notification to the Secretary of completion of closure of each Underground HDWU? (Or is there documentation that an extension of this time period has been granted by the NMED)				
6	Permit Part 6, Section 6.8 Survey Plat (20.4.1.500 NMAC (incorporating 40 CFR § 264.116))	Is there documentation that survey plats detailing the location and dimensions of each of the closed Underground HMWU's were submitted prior to the certification of those closures?				
7	Permit Part 6, Section 6.10.1 Panel Closure	Is their documentation of written notification to the Secretary stating the final volume of TRU mixed waste emplaced in each Underground HDWU, and are their links on the WIPP Home Page to those notices and the Closure Report and documentation of notification of those on the e-mail notification list?				

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	RCRA Permit Part 6 through 8 - Closure, Post-Closure and Corrective Action					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Parts 6 through 8**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
8	Permit Part 6, Section 6.10.1 Panel Closure	Is their documentation that the facility meets the closure standards in Table 6.10.1?				
9	Permit Part 6, Section 6.10.1 Panel Closure	Does documentation support closure of completed Underground HDWU's in accordance with requirements of Permit Attachment G and Permit Attachment G1 (Detailed Design Report)?				
10	Permit Part 7, Section 7.3.2.1 General Monitoring, Inspection, and Maintenance Requirements	Is there documentation that indicates the required inspection of accessible closure bulkheads is taking place as required by Permit Attachment E?				
11	Permit Part 7, Section 7.3.2.2. Air Monitoring Requirements	Is there documentation that indicates the required post-closure air monitoring is taking place?				
12	Permit Part 8, Section 8.4 Notification and Assessment for Newly Identified SWMUs and AOCs	Have there been any newly identified SWMUs or AOC's beyond those listed in Permit Attachment K? If so, is there documentation of written notification of the Secretary within 15 days of the discovery, and does that notification meet the notification requirements?				
13	Permit Part 8, Section 8.4 Notification and Assessment for Newly Identified SWMUs and AOCs	If written notifications to the Secretary have been made under Section 8.4, has the Secretary required the submittal of Release Assessment Report, and has that report been submitted meeting the requirements of Section 8.6.1?				
14	Permit Part 8, Section 8.4 Notification and Assessment for Newly Identified SWMUs and AOCs	If written notifications to the Secretary have been made under Section 8.4, has the Secretary required the submittal of an Investigation Work Plan, and has that report been submitted meeting the requirements of Section 8.8.1?				
15	Permit Part 8, Section 8.4 Notification and Assessment for Newly Identified SWMUs and AOCs (20.4.1.900 NMAC (incorporating 40 CFR § 270.42))	If an Investigation Work Plan has been requested, has the Permit been modified to add the identified SWMU or AOC to Permit Attachment K?				

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	RCRA Permit Part 6 through 8 - Closure, Post-Closure and Corrective Action					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Parts 6 through 8**				
	Citation	Required Program				Notes/Comments
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16	Permit Part 8, Section 8.6.1 Release Assessment Report (20.4.1.900 NMAC (incorporating 40 CFR § 270.14(b)(19)))	If a Release Assessment Report has been requested by the Secretary, was it prepared and submitted in accordance with Permit Part 8.6?				
17	Permit Part 8, Section 8.7.1 Secretary-Initiated Interim Measures	Has written notification for the Secretary of a requirement for an Interim Measures (IM) Work Plan been received and, if so, has the IM Work Plan been submitted within 30 calendar days?				
18	Permit Part 8, Section 8.7.2 Permittee-Initiated Interim Measures	Has Permittee-initiated Interim Measures been initiated and, if so, was 30 calendar days notice provided to the Secretary before initiating IM?				
19	Permit Part 8, Section 8.7.3 Emergency Interim Measures	Has emergency Interim Measures been initiated and, if so, was one day notice provided to the Secretary before initiating IM?				
20	Permit Part 8, Section 8.7.5 Interim Measures Implementation	If Interim Measures were approved, was the work completed within 180 calendar days of the start of implementation, or was written approval received from the Secretary for an extension of that schedule?				
22	Permit Part 8, Section 8.8.1.3 Investigation Work Plan Submittal Historical Documents	Have historical documents for the SWMUs and AOCs been submitted to the Secretary as required?				

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	RCRA Permit Attachment C - Waste Analysis Plan					
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	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment C, Section C-5b –Phase II Waste Shipment Screening and Verification	Is there a program/procedure in place outlining the requirements of Phase II (e.g., confirm EPA numbers and check for irregularities) waste shipment screening and verification?				
2	Permit Attachment C, Section C-5b(2) –Examination of the Land Disposal Restriction (LDR) Notice	Is there a procedure in place outlining how the Permittees evaluate a generator site LDR Notice for accuracy and completeness?				
3	Permit Attachment C, Section C-5b(3) –Verification	How do the Permittees verify that the containers in a shipment are the containers for which accepted data already exists in the WWIS?				
4	Permit Attachment C, Section C-6 – Permittees' Waste Shipment Screening QA/QC	What administrative QA/QC processes control the waste shipment screening process? Where is it documented?				
5	Permit Attachment C, Section C-7 – Records Management & Reporting; C-7(a) - General Requirements, C-7(b) - Records Storage	Is there a procedure in place documenting how waste characterization records will be managed, stored and maintained?				
6	Permit Attachment C, Section C-8 – Reporting	Are the Permittees in compliance with the requirement to provide a biennial report to NMED that includes information on actual volume and waste descriptions received for disposal during the time period covered by the report?				

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	RCRA Permit Attachment D - Contingency Plan					
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	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment D, Section D-1 - Scope and Applicability, 20.4.1.500 NMAC (incorporating 40 CFR §264.51(b)) & §262.34(a)(4)	Is there a program/procedure requiring a formal contingency plan that describes actions that facility personnel take in response to any fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?				
2	Permit Attachment D, Section D-2a - Emergency Response Personnel, 20.4.1.500 NMAC (incorporating 40 CFR §264.52(d))	Is there a program/procedure requiring that a RCRA emergency coordinator be on site at WIPP full-time and be trained in accordance with the requirements in Attachment F-1 under Emergency Coordinator?				
3	Permit Attachment D, Section D-2a - Emergency Response Personnel	Is there a program/procedure outlining the responsibilities of the additional eight individuals, groups and organizations listed in Section D-2a?				
4	Permit Attachment D, Section D-2b – Emergency Response Training	Is there a program/procedure in place to ensure WIPP Emergency Response personnel are trained in accordance with the *WIPP Emergency Response Training Plan* as well as site-specific training as described in Permit Attachment F?				
5	Permit Attachment D, Section D-3 - Criteria for Implementation of the RCRA Contingency Plan, 20.4.1.500 2 NMAC (incorporating 40 CFR §264.51(b))	Is there a program/procedure in place ensuring that the RCRA Contingency Plan is implemented immediately in the case of a fire, explosion or a release of hazardous wastes or hazardous waste constituents that could threaten human health or the environment?				
6	Permit Attachment D, Section D-3 - Criteria for Implementation of the RCRA Contingency Plan, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i))	Is there a program/procedure in place ensuring that the Emergency Coordinator record the date, time and details of the incident that required implementation of the Contingency Plan?				

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7	Permit Attachment D, Section D-3 - Criteria for Implementation of the RCRA Contingency Plan, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i)) & §264.56(a)	Is there a program/procedure in place ensuring that the Permittees immediately notify NMED of incidents requiring implementation of the Contingency Plan ?				
8	Permit Attachment D, Section D-3 - Criteria for Implementation of the RCRA Contingency Plan, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i))	Is there a program/procedure in place which describes the emergency situations (e.g., fire, explosions, unplanned sudden-non sudden releases, other occurrences) that require immediate implementation of the Contingency Plan?				
9	Permit Attachment D, Section D-3 - Criteria for Implementation of the RCRA Contingency Plan	Is there a program/procedure in place that requires the Emergency Coordinator to document when the RCRA Contingency Plan was not implemented for any natural phenomenon or underground structural emergency that does not meet the criteria in Section D-3?				
10	Permit Attachment D, Section D-4a(1) – Initial Emergency Response & Alerting the RCRA Emergency Coordinator, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(a))	Is there a program/procedure in place which describes the notification processes required for facility personnel when a fire, explosion or release occurs at the facility?				
11	Permit Attachment D, Section D-4a(2) – Communication of Emergency Conditions to Facility Employees, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(a))	Are there communications (i.e., fire alarms surface evacuation signal) in place to notify facility personnel immediately of emergency situations?				
12	Permit Attachment D, Section D-4b - Identification of Released Materials and Assessment of the Extent of the Emergency, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(b)	Is there a program/procedure in place requiring that the Emergency Coordinator direct an investigation to determine pertinent information relevant to the actual or potential threat posed to human health or the environment?				

13	Permit Attachment D, Section D-4b - Identification of Released Materials and Assessment of the Extent of the Emergency, 20.4.1.500 NMAC (incorporating 40 CFR §264.52(a) and §264.171)	In the event of a spill or release of hazardous waste or hazardous waste constituents, is there a program/procedure in place requiring that the Emergency Coordinator take the actions (i.e., assemble equipment, transfer contents, determine extent) identified in Permit Attachment D-4b?				

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14	Permit Attachment D, Section D-4c - Assessment of the Potential Hazards, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(c))	Is there a program/procedure in place requiring that the Emergency Coordinator conduct a hazard assessment to identify potential hazards to human health and the environment from the fire, explosion or spill/release?				
15	Permit Attachment D, Section D-4d - Post-Assessment Notifications, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(1))	If it is determined that a spill or release of hazardous waste or hazardous waste constituents could threaten human health or the environment outside the facility boundary, is there a program/procedure in place requiring that the Emergency Coordinator notify the local (NM Homeland Security, Eddy Co., Lea Co.) agencies/organizations listed in Permit Attachment D, Section D-4d?				
16	Permit Attachment D, Section D-4d - Post-Assessment Notifications, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(2))	If it is determined that a spill or release of hazardous waste or hazardous waste constituents could threaten human health or the environment outside the facility boundary, is there a program/procedure in place requiring that the Emergency Coordinator notify the government (i.e., NMED and National Response Center) agencies/organizations listed in Permit Attachment D, Section D-4d?				
17	Permit Attachment D, Section D-4e - Control and Containment of the Emergency, 20.4.1.500 NMAC (incorporating 40 CFR §264.56 (e) and 31(f))	Is there a program/procedure in place requiring that the Emergency Coordinator ensure control of an emergency and minimize the potential for the occurrence, recurrence, or spread of releases due to the emergency situation?				
18	Permit Attachment D, Section D-4e - Control and Containment of the Emergency	Is there a program/procedure in place requiring that the Emergency Coordinator, in conjunction with the Incident Commander ensure control of an emergency via the measures (e.g., stopping processes & operations) listed in Permit Attachment D, Section D-4e?				

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	RCRA Permit Attachment D - Contingency Plan					
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19	Permit Attachment D, Section D-4e - Control and Containment of the Emergency	Is there a procedure(s) in place documenting the appropriate actions for controlling releases (e.g., establishing drainage controls) in accordance with Permit Attachment D, Section D-4e?				
20	Permit Attachment D, Section D-4e - Control and Containment of the Emergency	If the facility stops operations in response to a fire, explosion or release, is there a procedure/program in place to ensure continued monitoring for leaks pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate in accordance with Permit Attachment D, Section D-4e?				
21	Permit Attachment D, Section D-4e - Control and Containment of the Emergency	Is there a procedure/program in place to ensure that natural and/or synthetic methods (e.g., absorption, neutralization) are utilized to limit release of hazardous waste or hazardous waste constituents in accordance with Permit Attachment D, Section D-4e?				
22	Permit Attachment D, Section D-4e - Control and Containment of the Emergency	Is there a procedure/program in place documenting the steps necessary to terminate the field emergency response activities in accordance with Permit Attachment D-4e?				
23	Permit Attachment D, Section D-4e(1) - Fires	In case of a fire that threatens TRU mixed waste or site-generated hazardous waste, is there a procedure/program in place documenting the emergency response actions that can be utilized in accordance with Permit Attachment D, Section D-4e(1)?				

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	RCRA Permit Attachment D - Contingency Plan					
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24	Permit Attachment D, Section D-4e(2) - Explosions	In case of an explosion that threatens TRU mixed waste or site-generated hazardous waste, is there a procedure/program in place documenting the emergency response actions that can be utilized in accordance with Permit Attachment D, Section D-4e(2)?				
25	Permit Attachment D, Section D-4e(3) – Unplanned Sudden/Non-Sudden Releases	In case of an unplanned sudden/non-sudden release that threatens TRU mixed waste or site-generated hazardous waste, is there a procedure/program in place documenting the emergency response actions that can be utilized in accordance with Permit Attachment D, Section D-4e(3)?				
26	Permit Attachment D, Section D-4e(4) – Other Occurrences	In case of a natural phenomenon (e.g., earthquake, tornado) that threatens TRU mixed waste or site-generated hazardous waste, is there a procedure/program in place documenting the emergency response actions that can be utilized in accordance with Permit Attachment D, Section D-4e(4)?				
27	Permit Attachment D, Section D-4e(4) – Other Occurrences	In case of an underground structural integrity emergency that threatens TRU mixed waste or site-generated hazardous waste, is there a procedure/program in place documenting the emergency response actions that can be utilized in accordance with Permit Attachment D, Section D-4e(4)?				
28	Permit Attachment D, Section D-4f - Post-Emergency Activates, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(g))	Is there a procedure/program in place ensuring that upon initial release or spill control and containment have been completed, the RCRA Emergency Coordinator completes necessary decontamination and that recovered hazardous waste is properly managed, stored, and/or disposed?				

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	RCRA Permit Attachment D - Contingency Plan					
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29	Permit Attachment D, Section D-4f - Post-Emergency activities, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(h))	Is there a procedure/program in place ensuring that upon initial release or spill control and containment have been completed, the RCRA Emergency Coordinator will ensure that incompatibility of waste and restoration of emergency equipment are addressed?				
30	Permit Attachment D, Section D-4f(1) - Management and Disposition of Released Material, 20.4.1.200 NMAC (incorporating 40 CFR Part 261, Subparts C and D)	Is there a procedure/program in place ensuring that the Emergency Coordinator, upon completion of decontamination, nonradioactive hazardous waste resulting from the cleanup of a fire, an explosion, or a release involving a nonradioactive hazardous waste at the WIPP facility will be appropriately managed in accordance with Permit Attachment D, Section D-4f(1)?				
31	Permit Attachment D, Section D-4f(2) - Incompatible Waste, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(h)(1))	Is there a procedure/program in place ensuring that the Emergency Coordinator not treat, store or dispose of any waste that may be incompatible with the released material until cleanup of the released material has been completed?				
32	Permit Attachment D, Section D-4f(3) - Cleaning and Restoring Equipment, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(h)(2))	Is there a procedure/program in place ensuring that the Emergency Coordinator take measures to ensure that in the affected area(s) of the facility, emergency equipment listed in the RCRA Contingency Plan, and used in the emergency response, is cleaned and fit for its intended use or replaced before operations are resumed?				
33	Permit Attachment D, Section D-5 - Required Reporting, 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i))	Is there a procedure/program in place ensuring that the Permittees submit a report to NMED within 15 days after an incident that requires implementation of the Contingency Plan ?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment D - Contingency Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
34	Permit Attachment D, Section D-6 - Emergency Equipment, 20.4.1.500 NMAC (incorporating 40 CFR §264.52(e))	Is there a procedure/program documenting the emergency equipment available at the WIPP facility, including its location and a brief description, in accordance with Permit Attachment D, Section D-6 and Table D-2?				
35	Permit Attachment D, Section D-7 - Agreements with Local Emergency Response Agencies, 20.4.1.500 NMAC (incorporating 40 CFR §264.37 and §264.52(c))	Is there a procedure/program for maintaining/updating the agreements with local emergency response agencies (e.g., BLM, Eddy Co.) identified in Permit Attachment D, Section D-7?				
36	Permit Attachment D, Section D-8 - Evacuation Plan, 20.4.1.500 NMAC (incorporating 40 CFR §264.52(f))	Is there a procedure/program for surface and underground evacuations as well as evacuation training drills?				
37	Permit Attachment D, Section D-8a – Surface Evacuation On-Site and Off-Site Staging Areas	Is there a procedure/program identifying the locations of surface evacuation on-site & off-site staging areas for WIPP facility personnel?				
38	Permit Attachment D, Section D-8b – Underground Assembly Areas and Egress Hoist Stations	Is there a procedure/program identifying the location of underground assembly areas and egress hoist stations for WIPP facility personnel?				
39	Permit Attachment D, Section D-8c –Plan for Surface Evacuation	Is there a procedure/program documenting the surface evacuation processes, including alarms, egress routes relevant incident information and specific instructions?				
40	Permit Attachment D, Section D-8d –Plan for Underground Evacuation	Is there a procedure/program documenting the underground evacuation processes, including alarms, egress routes relevant incident information and specific instructions for WIPP Emergency Response and MRT members?				
41	Permit Attachment D, Section D-8e –Further Site Evacuation	Is there a procedure/program documenting the evacuation processes involving personnel transport and the evacuation routes from the WIPP facility ?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment D - Contingency Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
42	Permit Attachment D, Section D-9 - Location o of the RCRA Contingency Plan and Plan Revisions, 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a))	Is there a procedure/program in place which documents the locations where the RCRA Contingency Plan shall be maintained at the WIPP facility?				
43	Permit Attachment D, Section D-9 - Location of the RCRA Contingency Plan and Plan Revisions, 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a))	Are copies of the RCRA Contingency Plan provided to the list of agencies/organizations in Permit Attachment D, Section D-2 and D, Section D-9?				
44	Permit Attachment D, Section D-9 - Location o of the RCRA Contingency Plan and Plan Revisions, 20.4.1.500 NMAC (incorporating 40 CFR §264.53(b))	Is there a procedure/program in place to ensure that the RCRA Contingency Plan is updated in accordance with the provisions in Permit Attachment D, Section D-9 (e.g., emergency coordinators change, the plan fails)?				
45	Permittees ensure that a copy of the Quick Reference Guide to the WIPP Facility RCRA Contingency Plan is maintained on file	Is a copy of the Quick reference Guide to the WIPP Facility RCRA Contingency Plan maintained on file and made available to emergency personnel?				
46	Whenever the RCRA Contingency Plan is revised, Permittees will update the Quick Reference Guide, if necessary, and redistribute in accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.262(c)).	When was the RCRA Contingency Plan last revised? At that time was the Quick Reference Guide updated and redistributed?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment E - Inspection Schedule, Process and Forms					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
1	Permit Attachment E Section E-1- Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(a-d), 40 CFR § 264.174, and 40 CFR § 264.602))	Confirm that inspection and maintenance records are maintained as active for three years, and that records beyond three years are stored either onsite or are archived offsite at a facility that is temperature and humidity controlled.				
2	Permit Attachment E Section E-1- Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(a-d), 40 CFR § 264.174, and 40 CFR § 264.602))	Are operating personnel thoroughly familiar with the inspection and maintenance procedures including logging, limitations to authority, and return of equipment to service?				
3	Permit Attachment E Section E-1 - Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(a-d), 40 CFR § 264.174, and 40 CFR § 264.602))	Are pre-operational inspections performed and logged using the approved procedure?				
4	Permit Attachment E Section E-1 - Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(a-d), 40 CFR § 264.174, and 40 CFR § 264.602))	Is there evidence that increasing trends are logged and noted and communicated?				
5	Permit Attachment E Section E-1 - Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(a-d), 40 CFR § 264.174, and 40 CFR § 264.602))	If a negative inspection cannot be corrected by the inspector or only requires monitoring, are appropriate actions taken?				
6	Permit Attachment E Section E-1 - Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(c)))	Are post-repair inspections with approval to return equipment to service documented?				
7	Permit Attachment E Section E-1 - Inspection Schedule (20.4.1.500 NMAC (incorporating 40 CFR § 270.42))	Have non-administrative changes to inspections (i.e., changes that affect the frequency or content of the inspection schedules) been submitted to NMED in accordance with the appropriate portions of 20 NMAC 4.1.900 (incorporating 40 CFR §270.42)?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment E - Inspection Schedule, Process and Forms					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
8	Permit Attachment E Section E-1a - General Inspection Requirements (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b)(4)))-	Are daily inspections of designated areas such as loading and unloading areas of the WHB unit documenting conditions of structures and equipment, as well as spills, completed and documented?				
9	Permit Attachment E Section E-1a - General Inspection Requirements (20.4.1.500 NMAC (incorporating 40 CFR § 264.33))	Are inspections, testing and maintenance of communication and alarm systems, fire-protection equipment, and spill and decontamination equipment performed as scheduled and appropriately documented?				
10	Permit Attachment E Section E-1b(1) Container Inspection (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b)(4))	Do containers of TRU mixed waste managed by the WIPP facility meet the descriptions found in this section?				
11	Permit Attachment E Section E-1b(1) Container Inspection (20.4.1.500 NMAC (incorporating 40 CFR § 264.15(b)(4))	Is there evidence that inspections of containers that are required by procedure are being performed and documented?				
12	Permit Attachment E Section E-1b(2) -Miscellaneous Unit Inspection (20.4.1.500 NMAC (incorporating 40 CFR § 264.602))	Is there evidence that inspections of the miscellaneous unit including the geomechanical monitoring system are being conducted?				
13	General	Have the findings from the Second Triennial Review been adequately addressed	NA			There were no findings or observations related to Attachment E in the Second Triennial Review. These Criteria were included in error.
14	General	Have the observations from the Second Triennial Review been adequately addressed	NA			There were no findings or observations related to Attachment E in the Second Triennial Review. These Criteria were included in error.

	Third Triennial Review Checklist					
	RCRA Permit Attachment F - Facility Personnel Permit Training Program					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment F - Personnel Training (20.4.1.500 NMAC (incorporating 40 CFR § 264.16 and 20.4.1.900 NMAC, incorporating 40 CFR § 270.14))	Perform overall review of the WIPP facility training program documentation and recordkeeping process.				
2	Permit Attachment F - Personnel Training (20.4.1.500 NMAC (incorporating 40 CFR § 264.16 and 20.4.1.900 NMAC, incorporating 40 CFR § 270.14))	Select specific personnel for a minimum of all six (6) job titles from Table F-1 for an in depth review of training records as compared to the respective Training (Type/Amount) requirements of the Permit Job Description for those positions as defined in Table F2.				
3	Permit Attachment F Section F-1b - Personnel Training Job Title/Job Description (20.4.1.500 NMAC (incorporating 40 CFR § 264.16)	Is there an up-to-date list of personnel assigned to the job titles in Table F-1?				
4	Permit Attachment F, Section F-1b(1) Training Content	Are employees not defined as TRU mixed waste workers trained to become knowledgeable in responding effectively to emergency situations as defined in the Permit?				
5	Permit Attachment F, Section F-1b(2) - Training Frequency	Is there a process to assure new hires or transfers receive relevant training, excluding Emergency Response, with in 6 months of assuming their new position?				
6	Permit Attachment F, Section F-1b(2) - Training Frequency	Is there a process or procedure for notifying managers when personnel are transferred into or out of a position associated with hazardous waste management?				
7	Permit Attachment F, Section F-1b(3) - Training Techniques	Are training techniques stipulated for each course listed in the Permit and do they include the methods listed in the Permit?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment F - Facility Personnel Permit Training Program					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
8	Permit Attachment F, Section F-1c - Training Manager	Has an individual been designated as the Technical Training Manager and does this person direct the RCRA Training Program?				
9	Permit Attachment F, Section F-1c - Training Manager	Is the Technical Training Manager trained in hazardous waste management and is he/she knowledgeable of the applicable regulations, orders, guidelines, and specific training processes employed at the WIPP facility?				
10	Permit Attachment F, Section F-2 - Implementation of Training Program	Are training records maintained at the facility for current employees and for three years after an employee leaves?				
11	General	Have the observations from the Second Triennial Review been adequately addressed				

	Third Triennial Review Checklist					
	RCRA Permit Attachment G - Closure Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment G Section G-1d(1) Schedule for Panel Closures	Have panel closures occurred within the start and end dates in Table G 1 of the Attachment? If not, have requests for Permit modification(s) been submitted? [Specifically address the finding from the last Triennial Review]				
2	Permit Attachment G Section G-1d(1) Schedule for Panel Closures	Has a Permit modification request been submitted for anticipated delays in start/end dates related to the remaining unclosed panels?				
3	Permit Attachment G Section G-1d(1) Schedule for Panel Closures	For panels that have undergone closure, is there documentation that supports adherence to the specific process for closure included in Attachment G?				
4	Permit Attachment G Section Table G-1 Anticipated Earliest Closure Dates for the Underground HWDUs	Was Panel 7 closure completed in February 2023?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment H - Post Closure Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment H Section H-1 Post-Closure Plan	Do the Permittees have a process/procedure to routinely inspect openings in the vicinity of panel closures				
2	Permit Attachment H Section H-1 Post-Closure Plan	Do the Permittees have a process/procedure to sample ventilation air for harmful constituents?				
3	Permit Attachment H Section H-1 Post-Closure Plan	Do the Permittees have a Repository Volatile Organic Compound Monitoring Program (RVMP) in place to monitor releases?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment K - SWMU and AOC Tables					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment K Table K-4 Hazardous Waste Management Units	Have any new AOC's been identified? If so, has a Permit modification been submitted to add them to the permit?				
2	Permit Attachment K Table K-4 Hazardous Waste Management Units	Has closure been completed on any of the listed panels?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment L - WIPP Groundwater Detection Monitoring Program Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment L, Section L-3a, 20.4.1.500 NMAC (incorporating 40 CFR § 264.97 and 264.98 (f))	Do the Permittees use Attachment L as the Groundwater Detection Monitoring Program and the Water Level Monitoring Program for the WIPP facility or are there separate procedures/programs that outlines these requirements?				
2	Permit Attachment L, Section L-4a – Monitoring Frequency	Do the Permittees monitor the groundwater surface elevations at the six DMWs on a monthly basis and prior to each annual sampling event?				
3	Permit Attachment L, Section L-4b – Analytical Parameters & Hazardous Constituents	Do the Permittees monitor for the parameters and hazardous constituents listed in Permit Part 5, Tables 5.4a and 5.4b?				
4	Permit Attachment L, Section L-4b – Analytical Parameters & Hazardous Constituents	When additional hazardous constituents are identified, how do the Permittees make changes to Tables 5.4.a and 5.4.b?				
5	Permit Attachment L, Section L-4c(1) – Groundwater Surface Elevation Monitoring Methodology	Do the Permittees measure the groundwater surface elevations in each DMW prior to groundwater sample collection and on a monthly basis?				
6	Permit Attachment L, Section L-4c(1) – Groundwater Surface Elevation Monitoring Methodology	Do the Permittees only collect serial samples until field indicator parameters stabilize or three well bore volumes are purged? What field indicator parameters are used?				
7	Permit Attachment L, Section L-4c(1), 20.4.1.900 NMAC (incorporating 40 CFR §270.41(a)(2))	Do the Permittees have a process established in the event a cumulative groundwater surface elevation change of more than 2 feet is detected in any DMP well over the course of one year which is not attributable to site tests or natural stabilization of the site hydrologic system?				
8	Permit Attachment L, Section L-4c(1) - Groundwater Surface Elevation Monitoring Methodology	Do the Permittees calculate density in the DMWs annually?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment L - WIPP Groundwater Detection Monitoring Program Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
9	Permit Attachment L, Section L-4c(1)(i) – Field Methods & Data Collection Requirements	Do the Permittees use an SOP (s) when making the groundwater surface elevation measurements? Which SOP(s)?				
10	Permit Attachment L, Section 4c(1)(ii) – Groundwater Surface Elevation Records & Document Control	Do the Permittees use an SOP(s) when administering and managing the field data sheets? Which SOP(s)? Is the computerized work sheet under appropriate QA control?				
11	Permit Attachment L, Section 4c(2)(i) – Groundwater Pumping & Sampling Systems	Do the Permittees use a dedicated insulated sampling line, that has a flow-control valve, to collect water samples that will undergo analysis?				
12	Permit Attachment L, Section L-4c(2)(ii) – Serial Samples	Do the Permittees use an SOP(s) when collecting serial samples? Which SOP(s)?				
13	Permit Attachment L, Section L-4c(2)(iii) – Final Samples	Do the Permittees use an SOP(s) when collecting final samples? Which SOP(s)?				
14	Permit Attachment L, Section L-4c(2)(iii) – Final Samples	Do the Permittees collect and analyze a serial sample for each day of final sampling to ensure samples collected for laboratory analysis are representative of stable conditions?				
15	Permit Attachment L, Section L-4c(2)(iii) – Final Samples	Is sample integrity ensured in accordance with the Permit?				
16	Permit Attachment L, Section L-4c(2)(iv) – Sample Preservation, Tracking, Packaging & Transportation	Do the Permittees use an SOP(s) for sample preservation, tracking, packaging and transport? Which SOP(s)?				
17	Permit Attachment L, Section L-4c(2)(v) – Sample Documentation & Custody	Do the Permittees use an SOP(s) to document sample collection, handling and custody? Which SOP(s)?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment L - WIPP Groundwater Detection Monitoring Program Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
18	Permit Attachment L, Section L-4c(2)(v) – Sample Documentation & Custody	Does the following documentation exist for each sampling event reviewed? - Sample numbers and Labels - Custody Seals - Sample Identification and Tracking - Chain of Custody and Request for Analysis				
19	Permit Attachment L, Section L-4c(3) – Laboratory Analysis	Do the laboratory selection criteria specify that the laboratory follow the procedures specified in SW 846 and that the laboratory follow EPA protocols unless alternate methods or protocols are approved by the NMED?				
20	Permit Attachment L, Section L-4d(1) – Sampling and Groundwater Elevation Monitoring Equipment Calibration & L-4d(2) - Groundwater Surface Elevation Monitoring Equipment Calibration Requirements	According to existing SOPs, how often must sampling and groundwater elevation monitoring equipment be calibrated?				
21	Permit Attachment L, Section L-4e(1) – Temporal & Spatial Analysis	Do the Permittees evaluate changes relative to baseline on an individual basis and report the concentrations of constituents as a time series, either in tabular form or in time plots?				
22	Permit Attachment L, Section L-4e(2) – Distribution & Descriptive Statistics	Do the Permittees use the 95th UTLV for those data sets where target analytes are measured at concentrations above method detection limits?				
23	Permit Attachment L, Section L-4e(3) – Action Levels	Is there a procedure for conducting an outlier test should the groundwater concentration of a constituent identified in Part 5, Table 5.6 is found to exceed an action level?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment L - WIPP Groundwater Detection Monitoring Program Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
24	Permit Attachment L, Section L-4e(4), 20.4.1.500 NMAC (incorporating 40 CFR §264.97(h)(4))	Do the Permittees compare the results from groundwater hazardous constituents of ongoing annual groundwater sample analysis to baseline values and report the results annually to NMED?				
25	Permit Attachment L, Section L-5a – Laboratory Data Reports	How do the Permittees ensure that analytical laboratories comply with the hard copy reporting requirements (e.g., summary, results of QC sample analyses) in section L-5a?				
26	Permit Attachment L, Section L-5c – Semi-Annual Groundwater Surface Elevation Report & Annual Culebra Groundwater Report	Does the Annual Culebra Groundwater Report submitted to NMED on an annual basis include the information listed (e.g., DMW & WLMP well configuration changes, pumping activities) in section L-5c?				
27	Permit Attachment L, Section L-5c – Semi-Annual Groundwater Surface Elevation Report & Annual Culebra Groundwater Report	Is the Annual Culebra Groundwater Report maintained as part of the WIPP facility Operating Record?				
28	Permit Attachment L, Section L-6 – Records Management	Do the Permittees maintain records generated during groundwater sampling and water level monitoring in project files or the Operating Record? Do they include the information (e.g., SAPs, SOPs) listed in section L-6?				
29	Permit Attachment L, Section L-7a(1) – L-7a(2)(vi) – Data Quality Objectives	How do the Permittees ensure that the DMP and the WLMP comply with the quality assurance requirements identified in section L-7?				
30	Permit Attachment L, Section L-7a(1) – L-7a(2)(vi) – Data Quality Objectives	How do the Permittees ensure that the DMP and the WLMP comply with the data quality objectives identified in section L-7a(1)?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment L - WIPP Groundwater Detection Monitoring Program Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
31	Permit Attachment L, Section L-7c – Instructions, Procedures and Drawings	Does WIPP facility document WP 13-1 outline the preparation and use of instructions and data quality procedures at the WIPP facility?				
32	Permit Attachment L, Section L-7d – Document Control	How do the Permittees ensure that the latest approved versions of WIPP facility SOPs are used in performing groundwater monitoring functions and that obsolete materials are adequately identified or removed from work areas?				
33	Permit Attachment L, Section L-7e – Inspection and Surveillance	Do the Permittees conduct inspection and surveillance (related to groundwater monitoring) activities in accordance with WIPP document WP 13-1?				
34	Permit Attachment L, Section L-7f – Control of Monitoring & Data Collection Equipment	Do the Permittees control, calibrate and maintain monitoring and data collection equipment in accordance with document WP 13-1?				
35	Permit Attachment L, Section L-7g– Control of Nonconforming Conditions	Do the Permittees control and prevent the use of defective equipment in accordance with WP 13-1?				
36	Permit Attachment L, Section L-7h– Corrective Action	How do the Permittees document and report conditions adverse to acceptable quality in accordance with corrective action procedures and correct these conditions as soon as possible?				
37	Permit Attachment L, Section L-7i– Quality Assurance Records	Do the Permittees identify prepare, collect, store, maintain, dispose, and permanently store QA and RCRA records in accordance with WP 13-1?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment N - VOC Monitoring Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment N, Section N-2 (and Table N-1) – Target Volatile Organic Compounds	Do the Permittees monitor for the target VOCs for repository monitoring and disposal room monitoring listed in Table N-1?				
2	Permit Attachment N, Section N-3a(1) – Sampling Locations for Repository VOC Monitoring	Do the Permittees collect air samples at Station VOC-C (west of air intake at bldg 489) to quantify VOCs in ambient air?				
3	Permit Attachment N, Section N-3a(1) – Sampling Locations for Repository VOC Monitoring	Do the Permittees collect air samples at Station VOC-D (at groundwater pad WQSP-4) to quantify background VOCs?				
4	Permit Attachment N, Section N-3a(3) – Ongoing Disposal Room VOC Monitoring in Panels 3 through 8	Are the Permittees conducting VOC monitoring in Room 1 of Panels 3, 4, and 6?	NA			This Criteria has been included in error.The reference for this Criteria has been removed from the Permit.
5	Permit Attachment N, Section N-3b – Analytes to be Monitored	How are non-target VOCs, that meet the criteria in section N-3b, added to the analytical laboratory target analyte list for both repository and disposal room VOC monitoring programs?				
6	Permit Attachment N, Section N-3c – Sampling & Analysis Methods	Do the Permittees use section N-3c to establish the VOC sampling and analysis methods or is there a separate procedure/program that outlines these requirements?				
7	Permit Attachment N, Section N-3d(1) – Sampling Schedule for Repository VOC Monitoring	Do the Permittees collect a 24-hour time-integrated sample two times per week in accordance with section N-3d(1)?				
8	Permit Attachment N, Section N-3d(2) – Sampling Schedule for Disposal Room VOC Monitoring	Do the Permittees collect VOC samples in disposal rooms with open panels at least once every two weeks in accordance with section N-3d(2)?				
9	Permit Attachment N, Section N-3e(1) – Data Evaluation & Reporting for Repository VOC Monitoring	Do the Permittees evaluate air sampling data to determine whether VOC emissions from the Underground HWDUs exceed the action levels Permit Section 4.6.2.3?				
10	Permit Attachment N, Section N-3e(1) – Data Evaluation & Reporting for Repository VOC Monitoring	Do the Permittees calculate the carcinogenic risk for the non-waste surface worker for each target VOC using the equations in section N-3e(1)?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment N - VOC Monitoring Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
11	Permit Attachment N, Section N-3e(1) – Data Evaluation & Reporting for Repository VOC Monitoring	Do the Permittees notify NMED in writing, within seven calendar days of obtaining validated analytical results, whenever the risk or HI exceeds the action levels?				
12	Permit Attachment N, Section N-3e(2) – Data Evaluation & Reporting for Disposal Room VOC Monitoring	Do the Permittees evaluate the validated data to determine whether the VOC concentrations in the air of any closed room, the active open room, or the immediately adjacent closed room exceeded the Action Levels for DRVMP?				
13	Permit Attachment N, Section N-3e(2) – Data Evaluation & Reporting for Disposal Room VOC Monitoring	Is there a procedure for notifying NMED in writing, within seven calendar days of obtaining validated analytical results, whenever the concentration of any VOC specified in Permit Part 4, 34 Table 4.4.1 exceeds the action levels specified in Permit Part 4, Table 4.6.3.2?				
14	Permit Attachment N, Section N-4a - N-4a(3) – Sampling Equipment	Does the SOP(s) for air sampling equipment provide detailed information about sample canisters, sample collection units and sample tubing as described in sections N-4a-N-4a(3)?				
15	Permit Attachment N, Section N-4b – Sample Collection	Does the SOP(s) for VOC sampling specify that Repository VOC samples will be 24 -hour time-integrated samples for each sampling event?				
16	Permit Attachment N, Section N-4b – Sample Collection	Does the SOP(s) for VOC sampling specify that field duplicate samples will be collected (two canisters filled simultaneously) for each VOC monitoring program at an overall frequency of at least 5 percent?				
17	Permit Attachment N, Section N-4b – Sample Collection	Does the SOP(s) for VOC sampling require that the sample lines be purged to ensure that the air collected is not air that has been stagnant in the tubing?				
18	Permit Attachment N, Section N-4c – Sample Management	Is there a procedure for how field sampling data sheets are to be completed to document the sampler conditions under which each VOC sample is collected?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment N - VOC Monitoring Plan					
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Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
19	Permit Attachment N, Section N-4c – Sample Management	Is there a procedure for how VOC sample containers are to be labeled, maintained, tracked and shipped in accordance with section N-4c?				
20	Permit Attachment N, Section N-4d – Maintenance of Sample Collection Units	Is there a procedure for how periodic maintenance for sample collection units and associated equipment will be performed?				
21	Permit Attachment N, Section N-4e – Analytical Procedures	How do the Permittees ensure that analytical laboratories comply with the methods and reporting requirements in section N-4e?				
22	Permit Attachment N, Section N-4e – Analytical Procedures	Is there a procedure for how the Permittees will preform data validation for VOC laboratory analytical results ?				
23	Permit Attachment N, Section N-4e – Analytical Procedures	Do the Permittees provide SOP updates to the NMED on an annual basis by January 31?				
24	Permit Attachment N, Section N-5 (and Table N-2)– Quality Assurance	Is there a procedure to ensure that QA activities for the VOC monitoring programs will be conducted in accordance with the documents: EPA Guidance for Quality Assurance Project Plans QA/G-5 (EPA, 2002) and the EPA Requirements for Preparing Quality Assurance Project Plans, QA/R-5 (EPA, 2001) and the QA criteria for VOC monitoring programs listed in Table N-2?				
25	Permit Attachment N, Section N-5 (and Table N-2)– Quality Assurance	Are the Permittees' SOPs in the facility Operating Record?				
26	Permit Attachment N, Section N-5a – Quality Assurance Objectives for the Measurement of Precision, Accuracy, Sensitivity & Completeness	Is there a procedure in place ensuring that the QA objectives for the measurement of data quality parameters (e.g., precision, accuracy, sensitivity, and completeness) detailed in section N-5a are achieved?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment N - VOC Monitoring Plan					
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Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
27	Permit Attachment N, Section N-5a(1) – Evaluation of Laboratory Precision	Is there a procedure describing how laboratory sample duplicates and blank spike/blank spike duplicate will be used to evaluate laboratory precision in accordance with section N-5a(1)?				
28	Permit Attachment N, Section N-5a(2) – Evaluation of Field Precision	Is there a procedure describing how field duplicate samples will be collected at a frequency of at least 5 percent for the RVMP and at least 5 percent for the DRVMP in order to achieve the data quality objective for field precision of 35 percent for each set of field duplicate samples?				
29	Permit Attachment N, Section N-5a(3) – Evaluation of Laboratory Accuracy	Is there a procedure describing how quantitative analytical accuracy will be evaluated through performance criteria on the basis of: (1) relative response factors generated during instrument calibration, (2) analysis of laboratory control samples (LCS), and (3) recovery of internal standard compounds?				
30	Permit Attachment N, Section N-5a(4) – Evaluation of Sensitivity	Is there a procedure describing how the sample inlet of the sample collection units will be protected sufficiently from the underground environment to minimize salt aerosol interference and that up to two filters, inert to VOCs, will be installed in the sample flow path to minimize particulate interference?				
31	Permit Attachment N, Section N-5a(5) – Completeness	Is there a procedure describing that the expected completeness for the program is greater than or equal to 95 percent and that data completeness will be tracked monthly?				
32	Permit Attachment N, Section N-5d – Data Reduction, Validation & Reporting	Is there a procedure in place ensuring that the data reduction, validation and reporting requirements of section N-5d are met?				

	Third Triennial Review Checklist					
	RCRA Permit Attachment N - VOC Monitoring Plan					
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Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
33	Permit Attachment N, Section N-5g – Corrective Actions	How do the Permittees identify, document and report corrective actions necessary to maintain 95% completeness of valid data and laboratory data quality?				
34	Permit Attachment N, Section N-5h – Records Management	Through what means do the Permittees maintain records control systems that provide adequate control and retention for program-related information in accordance with the requirements of section N-5h?				
35	Permit Attachment N, Section N-4a(1&2) – Sampling & Analysis Procedures for Disposal Room VOC Monitoring in Filled Panels	Do the Permittees collect disposal room VOC samples using the subatmospheric pressure grab sampling technique described in section N-4a(2)?				Modified to reflect appropriate requirement location in the RCRA Permit.

	Third Triennial Review Checklist					
	RCRA Permit Attachment O - WIPP Mine Ventilation Rate Monitoring Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	Permit Attachment O Section O-3a(1) Test and Balance Process	Is there documentation supporting that the testing and balancing of the mine ventilation system results meet the specific requirements of the section?				
2	Permit Attachment O Section O-3a(2) Test and Balance Schedule	Is there documentation supporting the testing and balancing of the mine ventilation system at intervals of less than eighteen months?				
3	Permit Attachment O Section O-3b(1) Ventilation of Active Room Minimum Air Flow	Is there a log which documents that minimum air flow of 35,000 scfm through active room(s) exists at the start of each shift, operational mode changes and configuration changes?				
4	Permit Attachment O Section O-3b(1) Ventilation of Active Room Minimum Air Flow	Is there a record of occurrences for times when the minimum flow rate cannot be achieved including reason and actions taken?				
5	Permit Attachment O Section O-5a Reporting	Has an annual report on Mine Ventilation Rate Monitoring Plan results been submitted to NMED annually, including Testing and Balancing results, when applicable?				
6	Permit Attachment O Section O-5a Reporting	Does the annual report on Mine Ventilation Rate Monitoring Plan results include reporting of failure to achieve the permitted flow rate when applicable?				
7	Permit Attachment O Section O-5a Reporting	Has placement of waste occurred when air flow rate was below 35,000 scfm and, if so, was NMED notified by e-mail within 15 calendar days for the start of placement?				
8	Permit Attachment O Section O-5b Recordkeeping	Does the Operating Record include the CRMO operating log that documents the ventilation system operating mode?				See Part 2, Criteria 20, 24 and 66-69 for additional information.

	Third Triennial Review Checklist					
	RCRA Permit Attachment O - WIPP Mine Ventilation Rate Monitoring Plan					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Resource Conservation and Recovery Act and New Mexico Hazardous Waste Act - Attachment C**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
9	Permit Attachment O Section O-5b Recordkeeping	Does the Operating Record include a log sheet documenting ventilation flow rate readings and applicable information listed in Section O-3c(2)?				
10	Permit Attachment O Section O-6 Quality Assurance	Are personnel conducting ventilation flow measurements clearly identified and have their qualifications been verified?				
11	Permit Attachment O Section O-6 Quality Assurance	Are instruments used in ventilation flow measurement calibrated as required, and is that information marked on the instruments?				
12	Permit Attachment O Section O-6 Quality Assurance	Is information on the calibration of instruments used in ventilation flow measurements documented as a part of the measurement process?				
13	Permit Attachment O Section O-6 Quality Assurance	How is ventilation simulation software used in ventilation flow management controlled?				

	Third Triennial Review Checklist					
	Clean Air Act (CAA) **(including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	40 CFR, Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Do the Permittees have an existing stationary compression ignition (CI) internal combustion engine (ICE) on site?				
2	40 CFR, Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Is there a process for determining whether the stationary CI ICE is intended to be an emergency engine or a non-emergency engine?				
3	40 CFR, Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	How do you ensure compliance with 40 CFR, Part 60, Subpart IIII?				
4	40 CFR, Part 63 Subpart ZZZZ	Do the Permittees have an existing stationary reciprocating internal combustion engine (RICE) on site?				
5	40 CFR, Part 63 Subpart ZZZZ	How do you ensure compliance with 40 CFR, Part 63, Subpart ZZZZ?				
6	NMED Facility ID 318 – Air Quality Bureau, NMED	Based on NMED's documentation, the only air permit at the WIPP facility is a minor source, stationary CI ICE?				
7	NMED Facility ID 318 – Air Quality Bureau, NMED	Does the WIPP facility report on asbestos emissions?				
8	40 CFR §60.4204 – What emission standards must I meet for non-emergency engines if I am an owner or operator of a stationary CI internal combustion engine (ICE)?	If applicable, is there a procedure/process for determining the applicable emission standards in accordance with §60.4204 (a-f) (i.e., pre-2007 model year, displacement of <30 liters per cylinder)?				
9	40 CFR §60.4205 – What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI ICE?	If applicable, is there a procedure/process for determining the applicable emission standards in accordance with §60.4205 (a-f) (i.e., pre-2007 model year, displacement of <30 liters per cylinder)?				
10	40 CFR §60.4206 – How long must I meet the emission standards if I am an owner or operator of a stationary CI ICE subject to this subpart?	Is there a process/procedure that flows down the requirement to comply with the applicable emissions standards for the entire life of the stationary IC ICE?				

	Third Triennial Review Checklist					
	Clean Air Act (CAA) **(including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
11	40 CFR §60.4207 – What fuel requirements must I meet for emergency engines if I am an owner or operator of a stationary CI ICE?	How do the Permittees ensure they are complying with the fuel requirements outlined in §60.4207 (a-e) for stationary CI ICEs?				
12	40 CFR §60.4208 – What is the deadline for importing or installing a stationary CI ICE produced in a previous model year?	How do the Permittees ensure they're complying with the import and/or installation of stationary CI ICEs produced in specific years (§60.4208(a-i)?				
13	40 CFR §60.4209 – What are the monitoring requirements if I'm the owner or operator of stationary CI ICE?	Is there a process/procedure/checklist that allows the Permittees to determine the applicable provisions of §60.4209(a&b)? For example, if the stationary CI ICE doesn't meet the standards for non-emergency engines, was a non-resettable hour meter installed?				
14	40 CFR §60.4211 – What are my compliance requirements if I'm the owner or operator of stationary CI ICE?	Is there a process/procedure that flows down the requirements of §60.4211(a-h)?				
15	40 CFR §60.4211 – What are my compliance requirements if I'm the owner or operator of stationary CI ICE?	Are the Permittees in compliance with §60.4211(a-h)?				
16	40 CFR §60.4212 – What test methods or other procedures must I use if I'm the owner or operator of stationary CI ICE with a displacement of less than 30 liters per cylinder?	Is there a process/procedure that flows down the requirements of §60.4212(a-e)?				
17	40 CFR §60.4212 – What test methods or other procedures must I use if I'm the owner or operator of stationary CI ICE with a displacement of less than 30 liters per cylinder?	Are the Permittees in compliance with the test methods outlined in §60.4212(a-e)?				
18	40 CFR §60.4213 – What test methods or other procedures must I use if I'm the owner or operator of stationary CI ICE with a displacement of greater than or equal to 30 liters per cylinder?	Is there a process/procedure that flows down the requirements of §60.4213(a-d)?				

	Third Triennial Review Checklist					
	Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
19	40 CFR §60.4213 – What test methods or other procedures must I use if I'm the owner or operator of stationary CI ICE with a displacement of greater than or equal to 30 liters per cylinder?	Are the Permittees in compliance with the test methods outline in §60.4213(a-d)?				
20	40 CFR §60.4214 – What are my notification, reporting and recordkeeping requirements if I'm the owner or operator of stationary CI ICE?	How do the Permittees determine the applicability of §60.4214 (a-e)? Is there a process/procedure/checklist for making this determination?				
21	40 CFR §60.4214 – What are my notification, reporting and recordkeeping requirements if I'm the owner or operator of stationary CI ICE?	Are the Permittees in compliance with notification, reporting and recordkeeping requirements in §60.4214(a-e)?				
22	40 CFR §60.4218 – What parts of the General Provisions apply to me?	What are the applicable portions of the General Provisions (§§60.1-60.9)? How was that determined?				
23	40 CFR §60.4218 – What parts of the General Provisions apply to me?	Are the Permittees in compliance with the applicable General Provisions in §§60.1-60.9?				
24	40 CFR §63.6603– What emission limitations, operating limitations and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?	If applicable, is there a process/procedure that flows down the emission limitations and operating limitations requirements of §63.6603(a-f)?				
25	40 CFR §63.6603– What emission limitations, operating limitations and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?	Are the Permittees in compliance with the requirements in §63.6603(a-f)?				
26	40 CFR §63.6604– What fuel requirements must I meet if I own or operate a stationary CI RICE?	How do the Permittees ensure they are complying with the fuel requirements outlined in §63.6604 (a-d) for stationary CI RICEs?				
27	40 CFR §63.6605– What are my general requirements for complying with this subpart?	What are the applicable portions of the general requirements (§63.6605(a&b)? How was that determined?				

	Third Triennial Review Checklist					
	Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
28	40 CFR §63.6605– What are my general requirements for complying with this subpart?	Are the Permittees in compliance with the requirements in §63.6605(a&b)?				
29	40 CFR §63.6612– By what date must I conduct the initial performance tests or other initial compliance demonstration requirements if I own or operate an existing stationary RICE located at an area source of HAP emissions?	Is there a process/procedure for determining when an initial performance test/initial performance demonstration must be performed for a stationary RICE? If so, was the performance test/initial compliance demonstration performed in compliance with this section?				
30	40 CFR §63.6615– When must I conduct subsequent performance tests?	Is there a process/procedure for determining when subsequent performance tests must be performed for a stationary RICE?				
31	40 CFR §63.6620– What performance tests and other procedures must I use?	Is there a process/procedure outlining the performance test methods that must be used pursuant to §63.6620 (a-i)?				
32	40 CFR §63.6620– What performance tests and other procedures must I use?	Are the Permittees test methods compliant with §63.6620(a-i)?				
33	40 CFR §63.6625– What are my monitoring, installation, collection, operation and maintenance requirements?	How do the Permittees determine the applicability of §63.6625 (a-j)? Is there a process/procedure/checklist for making this determination?				
34	40 CFR §63.6625– What are my monitoring, installation, collection, operation and maintenance requirements?	Once applicability is established, is there a process/procedure that flows down the monitoring, installation, collection, operation and maintenance requirements of §63.6625(a-j)?				
35	40 CFR §63.6625– What are my monitoring, installation, collection, operation and maintenance requirements?	Are the Permittees in compliance with monitoring, installation, collection, operation and maintenance requirements in §63.6625(a-j)?				
36	40 CFR §63.6630– How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?	Is there a process/procedure/checklist for demonstrating initial compliance with the emissions limitations, operating limitations and other requirements in §63.6630(a-e)?				

	Third Triennial Review Checklist					
	Clean Air Act (CAA) **(including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
37	40 CFR §63.6635– How do I monitor and collect data to demonstrate continuous compliance?	Is there a process/procedure/checklist outlining the monitoring and data collection requirements in §63.6635(a-c)?				
38	40 CFR §63.6635– How do I monitor and collect data to demonstrate continuous compliance?	Are the Permittees in compliance with monitoring, and data collection requirements in §63.6635(a-c)?				
39	40 CFR §63.6640– How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?	Is there a process/procedure/checklist outlining how to demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements in §63.6640(a-f)?				
40	40 CFR §63.6640– How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?	Are the Permittees in compliance with the requirements for demonstrating continuous compliance in §63.6640(a-f)?				
41	40 CFR §63.6645 – What notifications must I submit and when?	Is there a process/procedure/checklist outlining the notification requirements in §63.6645(a-i)?				
42	40 CFR §63.6645 – What notifications must I submit and when?	Are the Permittees in compliance with the notification requirements?				
43	40 CFR §63.6650 – What reports must I submit and when?	Is there a process/procedure/checklist outlining what reports must be submitted and by when?				
44	40 CFR §63.6650 – What reports must I submit and when?	Are the Permittees in compliance with the reporting requirements in §63.6650(a-h)?				
45	40 CFR §63.6655 – What records must I keep?	Is there a process/procedure/checklist outlining what records must be maintained?				
46	40 CFR §63.6655 – What records must I keep?	Are the Permittees in compliance with the record-keeping requirements in §63.6655(a-f)?				
47	40 CFR §63.6660 – In what form and how long must I keep my records?	Is there a process/procedure/checklist outlining in what form and how long records must be maintained?				
48	40 CFR §63.6660 – In what form and how long must I keep my records?	Are the Permittees in compliance with the form and record retention requirements in §63.6660(a-c)?				

	Third Triennial Review Checklist					
	Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Air Act (CAA) (including the National Emissions Standards for Hazardous Air pollutants (NESHAPS) and the New Mexico Air Quality Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
49	40 CFR §63.6665 – What parts of the General Provisions apply to me?	What are the applicable portions of the General Provisions (§§63.1-63.15)? How was that determined?				
50	40 CFR §63.6665 – What parts of the General Provisions apply to me?	Are the Permittees in compliance with the applicable General Provisions in §§63.1-63.15?				
51	General	Have the observations from the Second Triennial Review been adequately addressed?				

	Third Triennial Review Checklist					
	Clean Water Act (CWA) & NM Water Quality Act					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Water Act and the New Mexico Water Quality Act**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	NMAC 20.6.2.1201 (A) – Notice of Intent to Discharge	How do the Permittees ensure compliance with the requirement to file a notice with the groundwater quality bureau (GWQB) for discharges that may affect groundwater and/or the surface water quality bureau (SWQB) for discharges that may affect surface water?				
2	NMAC 20.6.2.1201 (C) – Notice of Intent to Discharge	Is there a process in place for ensuring that notices of intent (NOI) to discharge include all the required information outlined in 20.6.2.1201, subsection C?				
3	NMAC 20.6.2.1202 (A) – Filing of Plans and Specifications – Sewerage Systems	Have the Permittees had to file plans and specifications in accordance with 20.6.2.1202 , subsection A? If so, how do the Permittees ensure compliance with the requirement to file plans and specifications for modifying a sewerage system in a manner that will substantially change the quantity or quality of discharge to either groundwater or surface water?				
4	NMAC 20.6.2.1202 (C) – Filing of Plans and Specifications – Sewerage Systems	When applicable, how do the Permittees ensure compliance with the requirement to file plans and specifications for modifying a sewerage system prior to construction?				
5	NMAC 20.6.2.1203 (A) – Notification of Discharge-Removal	Should there be a discharge from the facility of oil or other water contaminant, is there a process in place to ensure compliance with the requirements of 20.6.2.1203, subsection A?				
6	NMAC 20.6.2.3103 (A-C) - Standards for Groundwater of 10,000 mg/l TDS concentration or less	How do the Permittees ensure that groundwater meets the human health standards, standards for domestic water supplies and standards for irrigation use outlined in 20.6.2.3103, subsections A-C NMAC (unless the existing condition exceeds the standard or unless otherwise provided in Subsection E of Section 20.6.2.3109 NMAC?				This Criteria was modified to clarify the question to be answered.
7	NMAC 20.6.2.3107 (A) – Monitoring, Reporting and Other Requirements	Does the Permittees' discharge plan meet the requirements of 20.6.2.3107, subsections A NMAC?				

	Third Triennial Review Checklist					
	Clean Water Act (CWA) & NM Water Quality Act					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Water Act and the New Mexico Water Quality Act**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
8	NMAC 20.6.2.3107 (B) – Monitoring, Reporting and Other Requirements	Do the Permittees' sampling and analytical techniques meet the requirements of 20.6.2.3107, subsections B NMAC?				
9	NMAC 20.6.2.3107 (C) – Monitoring, Reporting and Other Requirements	Is there a process in place ensuring that the Permittees notify NMED of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants?				
10	NMAC 20.6.2.3107 (D) – Monitoring, Reporting and Other Requirements	Is there a process in place ensuring that any authorized representative of NMED can conduct the activities (e.g., inspect relevant records) identified in 20.6.2.3107, subsection D?				
11	DP-831, Section A, condition 3 -	Is there a procedure/program in place ensuring that the Permittees maintain the impoundment liners in such a manner as to avoid conditions (e.g., erosion damage, animal burrows) which could affect the structural integrity of the impoundment(s) and/or impoundment liner(s)?				
12	DP-831, Operational Plan, Part A, condition 3	Is there a procedure/program in place ensuring that the Permittees routinely control vegetation by mechanical removal in a manner that is protective of the impoundment liner(s)?				
13	DP-831, Operational Plan, Part A, condition 4	How do the Permittees preserve a minimum of one foot of freeboard between the liquid level in all impoundments and the elevation of the top of the impoundment liners?				
14	DP-831, Faculative Lagoon System, condition 6	Do the Permittees maintain fences around the Facultative Lagoon System to control access by the general public and animals?				
15	DP-831, Faculative Lagoon System, condition 7	Do the Permittees maintain signs around the Facultative Lagoon System indicating that the wastewater at the facility is not potable?				
16	DP-831, Faculative Lagoon System, condition 8	Do the Permittees utilize certified operators to operate the wastewater collection, treatment and disposal systems?				

	Third Triennial Review Checklist					
	Clean Water Act (CWA) & NM Water Quality Act					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Water Act and the New Mexico Water Quality Act**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
17	DP-831, Faculative Lagoon System, condition 5	Have the Permittees measured the thickness of the sludge blanket in each pond of the Facultative Lagoon System? If not, will it be completed before the end of January 2025				
18	DP-831, Faculative Lagoon System, condition 5	Is there a process/procedure in place describing how sludge will be removed from the pond in a manner protective of the liner?				
19	DP-831, Faculative Lagoon System, condition 5	Is there a procedure/process in place describing the requirements for containing, transporting, disposing and reporting/documenting of removed sludge solids?				
20	DP 831, Evaporation Pond H-19, … , condition 10	Have the Permittees measured the thickness of the solids blanket in each of the storm water runoff impoundments? If not, will it be completed before the end of January 2024?				
21	DP 831, Evaporation Pond H-19, … , condition 10	Is there a procedure/process in place describing the requirements for containing, transporting, disposing and reporting/documenting of removed solids?				
22	DP 831, Salt Sorage Ponds, … , condition 25	Do the Permittees inspect the leak detection systems for Salt Storage Ponds 2 & 3 on a monthly basis for the presence of liquid?				
23	DP 831, Salt Sorage Ponds, … , condition 25	Do the Permittees keep an inspection log of findings and repairs made and include those logs in the semiannual report submitted to NMED?				
24	DP 831, Salt Sorage Ponds, … , condition 26	Do the Permittees conduct regular maintenance of the earthen cover on the Salt Cell 1 and the SPDV material pile?				
25	DP 831, Salt Sorage Ponds, … , condition 26	Do the Permittees conduct inspections monthly and after storm events of 2 inches or greater in a 24-hour period to evaluate potential erosion and vegetation success of the cover at the Salt Cell 1 and the SPDV material pile?				
26	DP 831, Monitoring & Reporting, Part A, condition 29	Do the Permittees have a process/procedure for sampling and analysis that incorporates the sampling methodology requirements of this permit part?				

	Third Triennial Review Checklist					
	Clean Water Act (CWA) & NM Water Quality Act					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Clean Water Act and the New Mexico Water Quality Act**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
27	DP 831, Monitoring & Reporting, Part A, condition 29	Do the Permittees conduct semiannual monitoring and submit a semiannual monitoring report to NMED in accordance with the timeframes and dates listed in this permit part?				
28	DP 831, Monitoring & Reporting, Part B, condition 31	Do the Permittees measure the domestic influent discharge to the Facultative Lagoon System on a monthly basis using a totalizing flow meter either on the influent line or one that measures the total domestic water usage?				
29	DP 831, Monitoring & Reporting, Part B, condition 32	Do the Permittees measure other authorized discharges to the Facultative Lagoon System by calculating the time/volume or volumetric measurement of the transport containers?				
30	DP 831, Monitoring & Reporting, Part B, condition 33	Do the Permittees include monthly meter readings, the units of measurement, monthly discharge volumes and other volumetric calculations in the semiannual monitoring report submitted to NMED?				
31	DP 831, Monitoring & Reporting, Part B, condition 34	Do the Permittees collect a wastewater sample every 6 months from the influent to the Facultative Lagoon System and analyze the sample for TKN, No3-N, SO4, TDS and Cl?				
32	DP 831, Monitoring & Reporting, Part B, condition 34	Is there a procedure/process for preserving, transporting and analyzing the sample?				
33	DP 831, Monitoring & Reporting, Part C, condition 36	Do the Permittees measure the volume, using a time/volume method volumetric measurement of the transport container calculation, of all wastewater discharged to the Evaporation Pond H-19 that is derived from miscellaneous non-hazardous sources and reported to NMED?				
34	DP 831, Monitoring & Reporting, Part C, condition 40	Do the Permittees collect a sample semiannually from the Evaporation Pond H-19 and analyzed for SO4, TDS and Cl?				

	Third Triennial Review Checklist					
	Clean Water Act (CWA) & NM Water Quality Act					
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	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
35	DP 831, Monitoring & Reporting, Part C, condition 40	Is there a procedure/process for collecting samples annually after a significant storm event from Storm Water Ponds 1, 2 & 3 and analyzed for SO4, TDS and Cl?				
36	DP 831, Monitoring & Reporting, Part C, condition 40	Is there a procedure/process for preserving, transporting and analyzing the sample?				
37	DP 831, Monitoring & Reporting, Part C, condition 43	Do the Permittees measure the water depth, on a monthly basis, to the nearest tenth of a foot in Storm Water Ponds 1, 2 and 3 and report the approximate volume of storm water to NMED in the semiannual monitoring report?				
38	DP 831, Monitoring & Reporting, Part D, condition 47	Is there a procedure/process for collecting a sample annually after a significant storm event from Salt Storage Cells 1, 2, and 3 and analyzed for SO4, TDS and Cl?				
39	DP 831, Monitoring & Reporting, Part D, condition 47	Is there a procedure/process for preserving, transporting and analyzing the sample?				
40	DP 831, Monitoring & Reporting, Part D, condition 48	Do the Permittees measure the water depth, on a monthly basis, to the nearest tenth of a foot in Salt Storage Ponds 1, 2 and 3 and report the approximate volume of storm water to NMED in the semiannual monitoring report?				
41	DP 831, Groundwater Monitoring Conditions, condition 56	Do the Permittees measure the depth to the water table, on a quarterly basis, to the nearest hundredth of a foot in the piezometers/monitoring wells listed in this permit section?				
42	DP 831, Groundwater Monitoring Conditions, condition 58	Do the Permittees perform semiannual groundwater sampling at the piezometers/monitoring wells listed in this permit section and analyze those samples for temperature, pH, specific conductance, SO4, TDS and Cl?				
43	DP 831, Groundwater Monitoring Conditions, condition 58	Do the Permittees use this permit section as the procedure for collecting, preserving, transporting and analysis of groundwater samples or is there a separate procedure/process which documents this requirement?				

	Third Triennial Review Checklist					
	Clean Water Act (CWA) & NM Water Quality Act					
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	REVIEW TOPIC	**Clean Water Act and the New Mexico Water Quality Act**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
44	DP 831, Groundwater Monitoring Conditions, condition 61	Is there a procedure/process ensuring that the depth-to-most-shallow groundwater measurements, analytical results, including the laboratory QA/QC summary report, and a facility layout map showing the location and number of each well are reported to NMED in the semiannual monitoring reports?				
45	DP 831, Groundwater Monitoring Conditions, condition 58	Do the Permittees preform semiannual groundwater sampling at monitoring well WQSP-6A and analyze the samples for TKN and NO3?				
46	DP 831, Groundwater Monitoring Conditions, condition 58	Is there a procedure/process for preserving, transporting and analyzing the sample?				
47	DP 831, Contingency Plan, condition 64	Is there a procedure/process that describes when the contingency plan should be enacted?				
48	DP 831, Contingency Plan, condition 67	Is there a procedure/process that outlines the requirements of a corrective action plan (once the contingency plan has been enacted)?				
49	DP 831, Contingency Plan, condition 67	In the event that an inspection reveals significant damage likely to affect the structural integrity of the lined impoundment(s) or its ability to contain contaminants, is there a procedure/process that outlines the requirements of submittal of a corrective action plan for repair or replacement?				
50	DP 831, Contingency Plan, condition 68	In the event that a minimum of one foot of freeboard cannot be preserved in the impoundment(s), is there a procedure/process that outlines how the Permittees will restore the required freeboard within 72 hours?				
51	DP 831, Contingency Plan, condition 68	In the event that freeboard cannot be restored within 72 hours in the impoundment(s), is there a procedure/process that outlines the requirements for submittal of short-term corrective action plan to restore the freeboard?				

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	Clean Water Act (CWA) & NM Water Quality Act					
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	REVIEW TOPIC	**Clean Water Act and the New Mexico Water Quality Act**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
52	DP 831, Contingency Plan, condition 68	In the event that short-term corrective action plan cannot restore the freeboard in the impoundment(s), is there a procedure/process that outlines the requirements for submittal of long-term corrective action plan to restore the freeboard?				
53	DP 831, Contingency Plan, condition 70	In the event that a release occurs that is not authorized under the permit, is there a procedure/process that outlines the requirements to mitigate damage and initiate notifications (e.g., 24-hour verbal) and corrective actions (e.g., submittal of corrective action plan/report within 15-days) in accordance with this permit condition?				
54	General	Have the observations from the Second Triennial Review been adequately addressed?				

	Third Triennial Review Checklist						
	New Mexico Solid Waste Act						
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST						
	REVIEW TOPIC		**New Mexico Solid Waste Act**				
	Citation		Required Program				Notes/Comments
			In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
1	NMAC 20.9.2.8 (A)	General Requirements	How do the Permittees ensure proper transportation of solid waste or recyclable materials to a permitted or registered facility?				
2	NMAC 20.9.2.8 (B)	General Requirements	What measures do the Permittees have to ensure the integrity for both their indoor and outdoor solid waste storage containers (except for construction and demolition debris, yard refuse, or white goods) when they are sedentary and when they are handled?				
3	NMAC 20.9.2.8 (C)	General Requirements	What measures do the Permittees have to store their solid waste, recyclable materials, yard refuse or white goods that prevents blowing litter, insect and rodent harborage, and does not create a public nuisance or public health hazard?				
4	NMAC 20.9.2.8 (D)	General Requirements	How do the Permittees ensure that their solid waste storage does not create a public nuisance?				
5	NMAC 20.9.2.8 (E)	General Requirements	Is there a process in place for directing notifications to the bureau chief of the solid waste bureau?				
6	NMAC 20.9.2.8 (F)	General Requirements	Is there a check in place to ensure the Permittees ; soil, water, and special waste testing methods used to demonstrate compliance with the Solid Waste Act or 20.9.2 - 20.9.10 NMAC are in conformance with permit requirements or are otherwise specifically approved by the department prior to use?				
7	NMAC 20.9.2.8 (G)	General Requirements	Is there a procedure in place to notify the department within 48 hours of an excavation of a closed cell or solid waste disposal area?				
8	NMAC 20.9.2.8 (H)	General Requirements	Is there a process for when the Permittee accepts, stockpiles, or uses clean fill material to comply with the requirements in NMAC 20.9.2.8 subsection H?				

	Third Triennial Review Checklist						
	New Mexico Solid Waste Act						
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	REVIEW TOPIC		**New Mexico Solid Waste Act**				
	Citation		Required Program				Notes/Comments
			In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
9	NMAC 20.9.2.10 (A)	Prohibited Acts	Is there a procedure in place to ensure the Permittees do not commit any of the nineteen prohibited acts listed in 20.9.2.10 subsection A?				
10	NMAC 20.9.2.10 (B)	Prohibited Acts	What measures are taken to determine the characteristics of the waste being handled?				
11	NMAC 20.9.8.10 (A)	General Requirements for Special Waste	Is there a process/procedure is in place to ensure that the special waste is stored at designated special waste storage areas meeting the requirements of 20.9.8 NMAC?				
12	NMAC 20.9.8.10 (B)	General Requirements for Special Waste	Is there a process/procedure is in place to ensure that the waste is placed in storage awaiting transportation, processing, or final disposal for no longer than 90 days?				
13	NMAC 20.9.8.10 (C)	General Requirements for Special Waste	Is there a process/procedure is in place to ensure that all containers of special waste when deemed full and placed in storage are clearly labeled or marked by their generators, indicating the name and address of the generator, contents, date placed in storage and potential health, safety, and environmental hazards associated with the waste?				
14	NMAC 20.9.8.10 (D)	General Requirements for Special Waste	Is there a process/procedure is in place to ensure that all containers of special waste that are prepared for transportation are clearly labeled or marked by their generators, indicating the name and address of the generator, contents, and potential health, safety, and environmental hazards associated with the waste?				
15	NMAC 20.9.8.10 (E)	General Requirements for Special Waste	Is there a process/procedure is in place for haulers to ensure that all containers of special waste are clearly labeled or marked prior to transportation, indicating the name and address of the generator, contents, date transported, and potential health, safety, and environmental hazards associated with the waste?				

	Third Triennial Review Checklist						
	New Mexico Solid Waste Act						
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	REVIEW TOPIC		**New Mexico Solid Waste Act**				
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			In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
16	NMAC 20.9.8.10 (F)	General Requirements for Special Waste	Is there a process/procedures in place for haulers or generators to ensure that a manifest in accordance with 20.9.8.19 NMAC accompanies each load of special waste originating in or being disposed in New Mexico?				
17	NMAC 20.9.8.11 (A)	Required Analysis	Is there a process/procedure in place to ensure that the physical and chemical characteristics of all special wastes for storage, transportation or disposal is properly documented by the means listed in 20.9.8.11 subpart A?				
18	NMAC 20.9.8.11 (B)	Required Analysis	How do the Permittees ensure that the laboratory performing an analysis follows U.S. EPA quality assurance and quality control procedures in accordance with U.S. EPA approved analytical methods or such other methods acceptable to the department?				
19	NMAC 20.9.8.11 (C)	Required Analysis	Is there a process/procedure in place to ensure that representative samples are analyzed in conformance with the parameters found in 20.9.8.11 subpart C?				
20	NMAC 20.9.8.15 (A)	Petroleum Contaminated Soils	Is there a process/procedure in place for generators of petroleum contaminated soil to assure that all petroleum contaminated soils to be disposed, processed, composted, or transformed at a solid waste facility are tested under the requirements of 20.9.8.11 NMAC?				
21	NMAC 20.9.8.15 (B)	Petroleum Contaminated Soils	Is there a process/procedure in place to ensure that petroleum contaminated soils containing free liquid are not accepted at a solid waste facility?				
22	NMAC 20.9.8.15 (B)	Petroleum Contaminated Soils	Is there a process/procedure to ensure the test results of soils that can pass the paint filter test are placed in the daily operating record and made available to the secretary upon request?				
23	NMAC 20.9.8.15 (C)	Petroleum Contaminated Soils	Are the methods of storage, remediation, and testing of petroleum contaminated soil described in the disposal management plan?				

	Third Triennial Review Checklist						
	New Mexico Solid Waste Act						
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	REVIEW TOPIC		**New Mexico Solid Waste Act**				
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			In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
24	NMAC 20.9.8.15 (C)	Petroleum Contaminated Soils	What checks are in place to ensure that the conditions of a soil sample listed in 20.9.8.15 subpart C are met in order to complete remediation of petroleum contaminated soil?				
25	NMAC 20.9.8.15 (D)	Petroleum Contaminated Soils	Is there a landfill identified to dispose of the Permittees' petroleum contaminated soils?				
26	NMAC 20.9.8.15 (E)	Petroleum Contaminated Soils	Is there a process/procedure in place to ensure that uncontaminated or remediated soils are not mixed with contaminated soils?				
27	NMAC 20.9.8.15 (F)	Petroleum Contaminated Soils	Is there a practice in place that ensures the owner or operators provides a written report to the department documenting remediation?				
28	NMAC 20.9.8.19 (A)	Manifest Requirements	Is there a process/procedure in place to ensure that each generator or authorized agent prepares a manifest following the requirements listed in 20.9.8.19 subpart A that accompanies each load of waste?				
29	NMAC 20.9.8.19 (B)	Manifest Requirements	Is there a process/procedure in place to ensure that a generator or authorized agent signs the manifest, obtains the signature of the initial transporter and date of acceptance of the manifest, and retains a copy of the manifest?				
30	NMAC 20.9.8.19 (B)	Manifest Requirements	Is there a process/procedure in place to ensure that a hauler obtains the signature of the individual who accepts the special waste for storage, further transportation or disposal, retains a copy of the manifest, and provides the original manifest to the next hauler or solid waste facility operator who receives the special waste?				
31	NMAC 20.9.8.19 (C)	Manifest Requirements	Is there a procedure in place to ensure the manifest accurately reflects the required information?				

	Third Triennial Review Checklist						
	New Mexico Solid Waste Act						
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST						
	REVIEW TOPIC		**New Mexico Solid Waste Act**				
	Citation		Required Program				Notes/Comments
			In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
32	NMAC 20.9.8.19 (C)	Manifest Requirements	Is there a procedure in place to ensure the manifest is signed and dated by the generator and each hauler of the special waste, and by the solid waste facility owner or operator, acknowledging delivery, weight or volume, and receipt of the special waste?				
33	NMAC 20.9.8.19 (C)	Manifest Requirements	Is there a check in place to ensure that all signatories are duly authorized agents of their organizations?				
34	NMAC 20.9.8.19 (C)	Manifest Requirements	Is there a procedure in place to ensure that the generator keeps a copy of the originating manifest for three years?				
35	NMAC 20.9.8.19 (D)	Manifest Requirements	Upon discovery of any significant discrepancy including, but not limited to, factual misrepresentation on the manifest, irregularities in transportation, discharges, or any unauthorized action in regard to the shipment, delivery, or disposal of the solid waste, is there a process in place for the person discovering the discrepancy to notify the department, generator, hauler, and solid waste facility operator in writing within 24 hours?				
36	NMAC 20.9.8.19 (E)	Manifest Requirements	When a special waste shipment is received at the solid waste facility, is there a procedure in place to ensure that the owner or operator of the solid waste facility sends the original signed copy of the manifest to the generator, acknowledging receipt of the shipment within 30 days?				
37	NMAC 20.9.8.19 (E)	Manifest Requirements	Is there a check in place to ensure the solid waste facility owner or operator lists any discrepancies on the manifest?				
38	NMAC 20.9.8.19 (F)	Manifest Requirements	Is there a process in place to ensure that a copy of the manifest is retained by each hauler, and solid waste facility operator for their operating records?				

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	New Mexico Solid Waste Act						
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	REVIEW TOPIC		**New Mexico Solid Waste Act**				
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			In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	YES	NO	
39	NMAC 20.9.8.19 (F)	Manifest Requirements	Is there a process in place to ensure that the generator retains for a period of three years both the originating copy and the returned original manifest signed by the solid waste facility owner or operator and all haulers transporting the waste?				
40	NMAC 20.9.8.19 (F)	Manifest Requirements	Is there a process in place to ensure that haulers retain a copy of the manifest for a period of three years?				
41	NMAC 20.9.8.19 (G)	Manifest Requirements	Is there a procedure in place to ensure that copies of the manifest are retained by the facility owner or operator throughout any post-closure period?				
42	General		Have the observations from the Second Triennial Review been adequately addressed?				

	Third Triennial Review Checklist					
	Emergency Planning and Community Right to Know Act (EPCRA) **(and the New Mexico Hazardous Chemicals Information Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Emergency Planning and Community Right to Know Act (EPCRA)** (and the **New Mexico Hazardous Chemicals Information Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	40 CFR Part 355-Emergency Planning and Notification	Is the DOE required to comply with EPCRA and the NMHCIA? How does the DOE ensure compliance with EPCRA and the NMHCIA?				
2	40 CFR, Subpart B, §355.10 – Must my facility comply with the emergency planning requirements of this subpart?	Is there a process/procedure that helps determine whether the WIPP facility is subject to the emergency planning requirements of 40 CFR §355.10?				
3	40 CFR, Subpart B, §355.11 – To what substances do the emergency planning requirements of this subpart apply?	Do the DOE have any of the extremely hazardous substances (EHSs) listed in Appendices A and B of §355.11. If so, how are they tracked/managed?				
4	40 CFR, Subpart B, §355.12 – What quantities of extremely hazardous substances trigger emergency planning requirements?	If the DOE has any EHSs, in what quantities? Do the quantities trigger the emergency planning requirements of 40 CFR Part 355?				
5	40 CFR, Subpart B, §355.13 – How do I calculate the quantity of an extremely hazardous substance present in mixtures?	If the DOE has EHSs on site, is there a process/procedure for calculating the quantity of the EHS in a mixture?				
6	40 CFR, Subpart B, §355.13 – How do I calculate the quantity of an extremely hazardous substance present in mixtures?	If applicable, is DOE performing the calculation in accordance with §355.13?				
7	40 CFR, Subpart B, §355.14 – Do I have to aggregate extremely hazardous substance to determine the total quantity present?	If applicable, is DOE aggregating the EHS to determine the total quantity present? Is there a process/procedure for performing this activity?				
8	40 CFR, Subpart B, §355.15 – Which threshold planning quantity do I use for an extremely hazardous substance present at my facility in solid form?	Is there a process/procedure that details which threshold planning quantity DOE must use for EHSs in solid form at the WIPP facility?				
9	40 CFR, Subpart B, §355.16 – How do I determine the quantity of extremely hazardous substances present for certain forms of solids?	Is there a process/procedure that details how to determine the quantity of EHSs present for certain forms of solids ?				

	Third Triennial Review Checklist					
	Emergency Planning and Community Right to Know Act (EPCRA) **(and the New Mexico Hazardous Chemicals Information Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Emergency Planning and Community Right to Know Act (EPCRA)** (and the **New Mexico Hazardous Chemicals Information Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
10	40 CFR, Subpart B, §355.20 – If this subpart applies at my facility, what information must I provide, who must I submit it to, and when is it due?	If applicable, is there a process/procedure to ensure the required information is provided to the appropriate organization on the required frequency?				
11	40 CFR, Subpart B, §355.20 – If this subpart applies at my facility, what information must I provide, who must I submit it to, and when is it due?	If DOE has provided such information was it in compliance with the table in §355.20?				
12	40 CFR, Subpart B, §355.21 – In what format should the information be submitted?	If applicable, is there a process/procedure to ensure the required information is provided in the format required in §355.21?				
13	40 CFR, Subpart B, §355.21 – In what format should the information be submitted?	If DOE has provided this information, did the format comply with the requirements in §355.21?				
14	40 CFR, Subpart C, §355.30 – What facilities must comply with the emergency release notification requirements of this subpart?	Is DOE required to comply with the emergency release notification requirements? How was this determined?				
15	40 CFR, Subpart C, §355.31 – What types of releases are exempt from the emergency release notification requirements of this subpart?	Is there a process/procedure for determining what types of releases are exempt from the emergency release notification requirements in §355.31(a-g)? Have DOE identified any exempt releases?				
16	40 CFR, Subpart C, §355.32 – Which emergency release notification requirements apply to continuous releases?	Does the DOE have any "continuous releases" as defined in §355.32(a-d)?				
17	40 CFR, Subpart C, §355.32 – Which emergency release notification requirements apply to continuous releases?	If so, is there a process/procedure for executing the emergency release notification requirements for continuous releases ?				

	Third Triennial Review Checklist					
	Emergency Planning and Community Right to Know Act (EPCRA) **(and the New Mexico Hazardous Chemicals Information Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Emergency Planning and Community Right to Know Act (EPCRA)** (and the **New Mexico Hazardous Chemicals Information Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
18	40 CFR, Subpart C, §355.33 – What release quantities of EHSs and CERCLA hazardous substances trigger the emergency release notification requirements of this subpart?	Is there a process/procedure that details the EHS and/or CERCLA hazardous substances reportable quantities (RQ) in Appendices A and B of 40 CFR Part 355? If so, does the process/procedure also detail the notification requirements if a RQ of a EHS or CERCLA hazardous substance is released within 24 hours?				
19	40 CFR, Subpart C, §355.40 – What information must I provide?	Is there a process /procedure detailing the information required for immediate notifications and written follow-up emergency notifications per §355.40(a-c)?				
20	40 CFR, Subpart C, §355.40 – What information must I provide?	Has the DOE had to make this type of notification?				
21	40 CFR, Subpart C, §355.41 – In what format should the information be submitted?	Is there a process /procedure detailing the format required for immediate notifications (oral) and written follow-up emergency notifications per §355.41?				
22	40 CFR, Subpart C, §355.42 – To whom must I submit the information?	Is there a process /procedure detailing who the immediate notifications (oral) and written follow-up emergency notifications must be sent per §355.42(a&b)?				
23	40 CFR, Subpart C, §355.43 – When must I submit the information?	Is there a process /procedure detailing when the immediate notification (oral) and written follow-up emergency notifications must be submitted per §355.43(a&b)?				
24	General	Have the observations from the Second Triennial Review been adequately addressed?				

	Third Triennial Review Checklist					
	Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	40 CFR §761.40-Marking Requirements	Are all PCB NRC Type B Packages, DOT Type A CH Packages, over the road vehicles and storge areas properly marked as required by 40 CFR 761.40?				
2	40 CFR §761.65 – Storage for Disposal	Does storage of PCB/TRU waste comply with 40 CFR 761.65 (c)(5) and (c)(6) (Storage for Disposal) requirements?				
3	40 CFR §761.180 - Post-Closure Care	Are records required under 40 CFR 761.180 (d) and (f) maintained for the time specified for closed panels?				
4	Permit Part III, Section A 1 - PCB/TRU Authorized Storage Areas	Is there a system for maintaining a live-time inventory of waste stored in the Parking Area Container Storage Unit and does that system demonstrate that storage has not exceeded 8,863 cubic feet of waste?				See Observation/Recommendation 1 - Need for Additional Assurance that Permitted Waste Volumes and Hold Times in the Waste Handling Building (WHB) and Parking Area Unit (PAU) are Not Exceeded
5	Permit Part III, Section A 2 - PCB/TRU Authorized Storage Areas	Is there a system for maintaining a live-time inventory of waste stored in the Waste Handling Building Container Storage Unit and does that system demonstrate that storage of CHTRU and RHTRU have not exceeded 6,466.3 and 387.7 cubic feet of waste, respectively?				See Observation/Recommendation 1 - Need for Additional Assurance that Permitted Waste Volumes and Hold Times in the Waste Handling Building (WHB) and Parking Area Unit (PAU) are Not Exceeded
6	Permit Part III, Section B&C - PCB/TRU Addition or Expansion of Authorized Storage Areas	Have additional storage areas, or expansion in size or capacity of permitted storage areas been requested, and, if so, has approval been received as prescribed prior to operation of those areas?				
7	Permit Part III, Section D 2 - PCB/TRU - General Storage Requirements	Are all waste packages received in approved casks and containers?				
8	Permit Part III, Section D 3 - PCB/TRU - General Storage Requirements	Are all packages in storage properly marked in accordance with 40 CFR §761.40 (except PCB/RHTRU Type 7A containers)?				
9	Permit Part III, Section D 4 - PCB/TRU - General Storage Requirements	Are all PCB items identified in the WIPP Waste Data System including all required dates?				

	Third Triennial Review Checklist					
	Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
10	Permit Part III, Section D 5 - PCB/TRU - General Storage Requirements	Is there a system in place to identify containers that are approaching maximum storage durations for CH and RHTRU of 60 and 25 days, respectively?				
11	Permit Part III, Section D 5 - PCB/TRU - General Storage Requirements	Is there an established process for identifying containers that will exceed maximum storage durations and initiate corrective actions?				
12	Permit Part III, Section E 1 - PCB/TRU - Storage Area Operating Requirements	Is there an established process for handling PCB items in the case of manifesting discrepancies?				
13	Permit Part III, Section E 2 - PCB/TRU - Storage Area Operating Requirements	Is there a clear definition of "adequate aisle space, and has adequate aisle space been maintained in the WHB Unit PCB/TRU waste storage areas?				
14	Permit Part III, Section E 3 - PCB/TRU - Storage Area Operating Requirements	Are waste containers stacked no more than two high in the operating area of the WHB, or three high in the hot cell?				
15	Permit Part IV, Section B 2 - PCB/TRU Disposal Requirements - Operating Requirements	Are responses to PCB spills documented to an extent that compliance with permit requirements can be verified?				
16	Permit Part IV, Section B 4 - PCB/TRU Disposal Requirements - Operating Requirements	Is there documentation of the total quantities of CH and RH TRU disposed of in completed panels, and are those quantities within the permitted amounts?				
17	Permit Part IV, Section B 6 - PCB/TRU Disposal Requirements - Operating Requirements	Are waste disposal record prepared and maintained in accordance with Part 761 Subpart K requirements?				
18	Permit Part V, Section A 1 - PCB/TRU - Closure Plan Requirements	Does the WIPP site Closure Plan comply with 40 CFR 761.65(d)(3)(viii)?				
19	Permit Part V, Section A 2 - PCB/TRU - Closure Plan Requirements	Have WIPP site Closure activities complied with requirements as specified by the HWFP issued by NMED?				
20	Permit Part V, Section B - PCB/TRU - Notice of Closure	Has EPA Region 6 been notified at least 30 days prior to closure of the completed disposal Panels?				
21	Permit Part V, Section C - PCB/TRU - Post-Closure Care	Are records maintained for closed Panels as required under 40 CFR §761.180(d) and (f)?				

	Third Triennial Review Checklist					
	Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Toxic Substances Control Act (TSCA) and polychlorinated biphenyl (PCB) Conditions of Approval**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
22	Permit Part VI, Section E 1 - PCB/TRU - Standard Approval Conditions -Operation and Maintenance	Does a system exist to track and control the maintenance of all systems to assure timely response to issues that would affect proper operation?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment E – Inspection Schedule, Process and Forms
23	Permit Part VI, Section E 2 - PCB/TRU - Standard Approval Conditions -Operation and Maintenance	Is there a system to track compliance of training requirements for all personnel that handle, transport, store, and/or dispose of PCB TRU waste and are all personnel current with that training?				Requirements under this criterion have been evaluated as a part of the RCRA Permit Attachment F – Facility Personnel Permit Training Program
24	Permit Part VI, Section I 2 - PCB/TRU - Standard Approval Conditions -Monitoring and Records	Are records maintained in compliance with 40 CFR §761.180(b)				
25	Permit Part VI, Section I 3 - PCB/TRU - Standard Approval Conditions -Monitoring and Records	Are all records written in ink, typed. Or put into electronic format?				
26	Permit Part VI, Section K - PCB/TRU - Standard Approval Conditions -Twenty-Four Hour Reporting	Does documentation exist that supports compliance with the reporting requirements for non-compliances?				
27	Permit Part VI, Section N 2 - PCB/TRU - Standard Approval Conditions -Spills	Does documentation exist that supports compliance with the reporting requirements for notifications for spill cleanups that exceed the permitted time, if any have occurred?				
28	General	Have the observations from the First Triennial Review been adequately addressed?				See Observation/Recommendation 1 - Need for Additional Assurance that Permitted Waste Volumes and Hold Times in the Waste Handling Building (WHB) and Parking Area Unit (PAU) are Not Exceeded

	Third Triennial Review Checklist					
	National Environmental Policy Act (NEPA)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**National Environmental Policy Act (NEPA)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	10 CFR § 1021.300 (a) - DOE shall determine, under the procedures in the CEQ Regulations and this part, whether any DOE proposal: (1) Requires preparation of an EIS; (2) Requires preparation of an EA; or (3) Is categorically excluded from preparation of either an EIS or an EA.	Are there established processes/procedures that identify and document, per DOE instruction, items that may qualify for a categorical exclusion?				
2	10 CFR § 1021.300 (a) - DOE shall determine, under the procedures in the CEQ Regulations and this part, whether any DOE proposal: (1) Requires preparation of an EIS; (2) Requires preparation of an EA; or (3) Is categorically excluded from preparation of either an EIS or an EA.	Is the WIPP NEPA checklist contained inWP 02-EC3801, "Environmental Review and NEPA Screening" that is used to evaluate WIPP facility NEPA compliance adequate? This includes the Environmental Compliance Review form (EA02EC3801-1-0), which also screens for additional environmental concerns.				
3	10 CFR § 1021.300 (a) - DOE shall determine, under the procedures in the CEQ Regulations and this part, whether any DOE proposal: (1) Requires preparation of an EIS; (2) Requires preparation of an EA; or (3) Is categorically excluded from preparation of either an EIS or an EA.	Are the environmental compliance reviews documented on EA02EC3801-1-0, Environmental Compliance Review Form being handled in accordance with Site Environmental Compliance Records Inventory and Disposition Schedule (RIDS)?				
4	10 CFR § 1021.300 (a) - DOE shall determine, under the procedures in the CEQ Regulations and this part, whether any DOE proposal: (1) Requires preparation of an EIS; (2) Requires preparation of an EA; or (3) Is categorically excluded from preparation of either an EIS or an EA.	The NEPA Compliance Plan (WP 02-EC.08) states that the M&O Contractor NEPA/Environmental Review (NEPA/ER) Coordinator uses a tracking spreadsheet/database to enter descriptions of activities not identified in Attachment 1, *Items Categorically Excluded from NEPA Approval* of WP 02-EC3801. Is this tracking spreadsheet/database up to date?				

	Third Triennial Review Checklist					
	National Environmental Policy Act (NEPA)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**National Environmental Policy Act (NEPA)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
5	10 CFR § 1021.300 (a) - DOE shall determine, under the procedures in the CEQ Regulations and this part, whether any DOE proposal: (1) Requires preparation of an EIS; (2) Requires preparation of an EA; or (3) Is categorically excluded from preparation of either an EIS or an EA.	Are Land Use Requests properly screened for NEPA Compliance in accordance with the *Land Management Plan* (DOE/WIPP-93-004) and applicable procedures prior to approval by the Land Use Coordinator and NEPA Compliance Officer if necessary?				
6	10 CFR § 1021.210(b) - DOE shall complete its NEPA review for each DOE proposal before making a decision on the proposal (e.g., normally in advance of, and for use in reaching, a decision to proceed with detailed design), except as provided in 40 CFR 1506.1 and §§ 1021.211 and 1021.216 of this part.	If a project/activity was not listed in WP 02-EC3801 Attachment 1, Items Categorically Excluded from NEPA Approval, is there documentation from the CBFO NEPA Compliance Officer or designee approving the project/activity?				
7	10 CFR § 1021.410 (b) - To find that a proposal is categorically excluded, DOE shall determine the following:	Are there established processes/procedures that identify and document, per DOE instruction, items that may qualify for a categorical exclusion?				
8	10 CFR § 1021.410 (b) - To find that a proposal is categorically excluded, DOE shall determine the following:	Is the list of items categorically excluded from NEPA approval, identified in Attachment 1, Items Categorically Excluded from NEPA Approval of WP 02-EC3801, Environmental Compliance Review and NEPA Screening up to date?				
9	40 CFR § 1503.13 - The regulations in this subchapter apply to any NEPA process begun after September 14, 2020. An agency may apply the regulations in this subchapter to ongoing activities and environmental documents begun before September 14, 2020.	On July 16, 2020, the CEQ issued an *Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act* (85 FR 43304) making the updated regulations applicable to NEPA processes begun after September 14, 2020. Have these updated regulations have been incorporated into the appropriate NEPA procedures and checklists?				

	Third Triennial Review Checklist					
	National Environmental Policy Act (NEPA)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**National Environmental Policy Act (NEPA)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
10	10 CFR § 1021.331 - Mitigation action plans (a) Following completion of each EIS and its associated ROD, DOE shall prepare a Mitigation Action Plan that addresses mitigation commitments expressed in the ROD. The Mitigation Action Plan shall explain how the corresponding mitigation measures, designed to mitigate adverse environmental impacts associated with the course of action directed by the ROD, will be planned and implemented. The Mitigation Action Plan shall be prepared before DOE takes any action directed by the ROD that is the subject of a mitigation commitment.	Does a Mitigation Action Plan (MAP) exist for previous EIS and ROD actions. Are the actions in the MAP tracked and reported as required?				
11	10 CFR § 1021.331 Mitigation action plans (b) In certain circumstances, as specified in § 1021.322(b)(1), DOE shall also prepare a Mitigation Action Plan for commitments to mitigations that are essential to render the impacts of the proposed action not significant. The Mitigation Action Plan shall address all commitments to such necessary mitigations and explain how mitigation will be planned and implemented. The Mitigation Action Plan shall be prepared before the FONSI is issued and shall be referenced therein.	Does a Mitigation Action Plan (MAP) exist for previous Findings of No Significant Impact (FONSI)? Are the actions in the MAP tracked and reported as required?				
12	10 CFR § 1021.331 - Mitigation action plans (d) DOE shall make copies of the Mitigation Action Plans available for inspection in the appropriate DOE public reading room(s) or other appropriate location(s) for a reasonable time. Copies of the Mitigation Action Plans shall also be available upon written request.	Are copies of MAPs available to the public as required?				The last WIPP Mitigation Action Plan that was developed was not within the evaluation timeframe of the Third Triennial Review. No requests have been made for copies of the Mitigation Action Plan or the NEPA Annual Mitigation Reports during the Review period.

	Third Triennial Review Checklist					
	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	40 CFR § Part 302.4 List of Hazardous Substances under CERCLA Section 103(a)	Is there a program in place that includes the identification of the listed CERCLA hazardous substances and reportable quantities?				
2	40 CFR § Part 302.5 Determination of Reportable Quantities under CERCLA Section 103(a)	Is there a program in place that includes procedures for determining when a release includes a CERCLA hazardous substance that reaches or exceeds the reportable quantity within a 24-hour period?				
3	40 CFR § Part 302.6 Notification Requirements under CERCLA Section 103(a)	Is there a program in place to immediately notify the National Response Center upon knowledge of a release of a CERCLA hazardous substance that reaches or exceeds a reportable quantity?				
4	40 CFR § Part 302.6 Notification Requirements under CERCLA Section 103(a)	How are site personnel made aware of the need to subject any release or spill to the identified program/process.?				
5	CERCLA Section 103	Have there been any notifications made to the National Response Center of a reportable release of a CERCLA hazardous substance in the last three years?				

	Third Triennial Review Checklist					
	Federal Insecticide, Fungicide, and Rodenticide Act (and the **New Mexico Pesticide Control Act)**					
	WASTE ISOLATION PILOT PLANT 2024 TRIENNIAL REVIEW CHECK LIST					
	REVIEW TOPIC	**Federal Insecticide, Fungicide, and Rodenticide Act (**and the **New Mexico Pesticide Control Act)**				
	Citation	Required Program				Notes/Comments
Number		In Compliance? NA=Not Applicable ND=Not Determined	NA or ND	Y E S	N O	
1	FIFRA Section 11 [7 USC 136i] Applicators and NMPCA 21.17.50.18 Certificates and Licensing	Do the WIPP purchase orders for contractors performing related activities contain language on required certification of technicians?				
2	FIFRA Section 11 [7 USC 136i] Applicators and NMPCA 21.17.50.18 Certificates and Licensing	Has proof of certification of technicians performing related activities at the WIPP site been provided by the contractors prior to performance of work?				
3	FIFRA Section 19 [7 USC 136q] Applicators and NMPCA 21.17.50.21 Proof of Financial Responsibility	Do the WIPP purchase orders for contractors performing related activities contain language on required proof of financial responsibility as required?				
4	FIFRA Section 19 [7 USC 136q] Applicators and NMPCA 21.17.50.21 Proof of Financial Responsibility	Has proof of financial responsibility site been provided by the contractors prior to performance of work at the WIPP site?				
5	NMPCA 21.17.50.22 Minimum Coverage Required	Do the WIPP purchase orders for contractors performing related activities contain language on required proof of insurance coverage as required?				
6	NMPCA 21.17.50.22 Minimum Coverage Required	Has proof of insurance coverage been provided by the contractors prior to performance of work at the WIPP site?				

Attachment D

Review Team Qualifications

RENEE ECHOLS
Waste Management SME

FIREWATER

Cynthia Renee Echols

Ms. Echols has over 35 years' experience in radiological protection and radioactive waste management. As a recognized expert in nuclear waste management programs and regulatory requirements, Ms. Echols specializes in problematic waste disposition, working both domestically and internationally with radioactive waste generators and regulatory agencies to solve some of the most complex waste treatment and disposition challenges, including low-level, mixed low-level, and transuranic (TRU) waste streams. As a nuclear consultant to Zeno Power Systems, Ms. Echols received a Certificate of Appreciation (Jan 2024) from the Department of Defense, Office of the Undersecretary of Defense, in recognition of her exceptional collaboration serving on a team that developed and executed a plan to recycle a Department of Energy (DOE) legacy waste stream for national security and space exploration missions. Ms. Echols also received an Outstanding Achievement award (May 2022) from DOE's National Nuclear Security Administration (NNSA) for supporting a Honeywell Federal Solutions led team that assessed and provided improvement recommendations for TRU waste management at the Los Alamos National Laboratory (LANL) in order to ready the site for NNSA's Plutonium Pit mission. Her nuclear waste management knowledge was critical in reviewing DOE's Waste Isolation Pilot Plant (WIPP) compliance posture following a three-year shutdown that followed a fire and uncontrolled reaction in the underground WIPP storage facility. Ms. Echols and her team led the First and Second Triennial Reviews of WIPP that was a negotiated regulatory settlement remedy to identify and address potential compliance issues to prevent recurrence.

Present Position:	**Qualifications:**
President and owner of a woman owned small business that is a leading radioactive waste management consultation company	• Bachelor of Science, Mississippi State University • DOE Q Clearance
Key Areas of Expertise:	**Memberships:**
• **Radioactive waste minimization, treatment and technology deployment** • **Radioactive and mixed waste regulatory compliance** • **Waste packaging, transportation and disposal** • **Waste management technologies and processes**	DOE Mercury Technology Review Committee Member Energy Facility Contractors Organization Group (EFCOG) Waste Management Working Group, Chair East Tennessee Economic Counsel Energy Technology Environmental Business Association (ETEBA)

RENEE ECHOLS
Waste Management SME

FIREWATER

Employment Record

2017 - Present President/Owner

Firewater Associates, LLC

- Provide nuclear waste management consultation to commercial technology providers to develop novel approaches for the reuse of radioactive materials (e.g., Zeno Power Systems recycle of DOE Strontium-90 for Defense missions) ; develop new approaches to addressing hazardous constituents such as mercury and Per- and Polyfluoroalkyl Substances (PFAS) for waste cleanup on DOE sites; and provide technical personnel resources to support DOE operations at sites around the complex.

- Serve as a waste management subject matter expert (SME) on a team supporting the NNSA, led by Oak Ridge National Laboratory, that is reviewing the Nuclear Security Enterprise (NSE)-wide radioactive waste management (WM) performance review to "assess the boundaries from waste generation to packaging for transportation, and . . . evaluate the safety, quality, performance, and timeliness of our radioactive waste management programs." The goal is to identify improvement opportunities and best practices to increase reliability and efficiencies in NNSA production and radioactive WM activities. This team is using information from document reviews, interviews, and observations to evaluate the health of existing NSE-wide processes, infrastructure, resources, inventory, and program management plans; determine best practices to be shared across the NSE; identify areas of risk; and develop site-specific and NSE-wide observations for increasing reliability and efficiency of NNSA waste operations, including reducing risks and significant occurrences to improve efficiency and reduce non-compliances.

- Served as a waste management SME on a team supporting the NNSA, led by Honeywell Federal Solutions, for the purpose of identifying areas of improvement and identifying risks for TRU waste management and disposition at the Los Alamos National Laboratory (LANL). The primary goal of this effort was to accommodate the planned increase in TRU waste generation as LANL meets a congressional mandate to significantly increase plutonium pit production. A secondary goal was to develop lean manufacturing tools within the waste management process to mitigate risk of disruptions or delays. The team was successful in providing suggested improvements that has led to significant improvement of TRU waste management at LANL, which resulted in the team being awarded a "2021 Excellence Award " for outstanding achievement by the NA-50 Office of Safety, Infrastructure, and Operations.

- Led a team of subject matter experts on two regulatory compliance reviews (Triennial Reviews) in support of the DOE WIPP prime contractor Nuclear Waste Partnership. This review was initiated to resolve alleged violations of WIPP's permits from the receipt, disposal and uncontrolled reaction/fire of a non-compliant waste stream (nitrate salts from LANL). The fire damaged and contaminated a portion of the underground disposal facility and resulted in WIPP's closure for approximately three years. DOE, the U.S. Environmental Protection Agency (EPA), and the State of New Mexico Environment Department (NMED) negotiated a settlement that required an independent review of WIPP's regulatory posture be conducted every three years. Ms. Echols' team conducted each of the last two Triennial Reviews. The reviews met the goals of identifying non-compliance or potential non-compliance in the areas of radioactive waste management (including TRU wastes); hazardous waste management regulations; transportation; nuclear facility operations; treatment and disposal facility (TDF) waste acceptance; forensic analysis of nuclear processes; and preparation of National Environmental Policy Act documentation including supplemental analyses. For each review, the Team evaluated over 500 individual criteria across six regulatory areas and issued a final report identifying areas of compliance concern and recommendations to resolve them. The report was critical for DOE to meet consent decree requirements.

- Serve as a waste management SME supporting the DOE Oak Ridge Environmental Management (OREM) for the multi-billion-dollar demolition and disposal project to address large former mercury use facilities at the Y-12 National Security Site (Y-12). This cleanup project is the largest cleanup of radioactively contaminated mercury in the world and will require the development and deployment of a number of new technologies to ensure that mercury can be safely removed, treated, and disposed in a manner that is protective of human health and the environment.

- Led development of an alternative commercial disposition strategy for Hanford's Test Bed Initiative to address high-level radioactive tank wastes stored at Hanford. DOE is responsible for the removal and treatment of approximately 53 Million gallons of high level wastes contained in underground tanks that are threatening the environment in the region. Reclassifying a portion of high-level waste to low-level radioactive waste will enable treatment by stabilization and offsite disposal of some of these wastes at a much lower cost than the planned vitrification for all tank waste. DOE has recognized the value of this alternative strategy and now plans to employ it in the future at Hanford thus accelerating the cleanup at Hanford and saving hundreds of millions of dollars.

- Provided integrated project waste management technical personnel to oversee waste packaging and transportation of radioactive and hazardous wastes generated from

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decontamination and decommissioning (D&D) activities by DOE's prime contractor at three installations within the Oak Ridge Reservation. Provided security personnel at Y-12 to facilitate work within the secured areas.

- Provided security escort personnel to support Sandia National Laboratory's security projects at the Y-12.

2000-2016 **Senior Vice President, Sales, Business Development & Marketing**

Perma-Fix Environmental Services, Inc.

- Led effort to establish Perma-Fix as the first commercial treatment processor to become a NNSS approved generator, qualifying Perma-Fix to offer treatment and disposal capabilities to DOE.
- Managed integrated collaboration of ideas from a diverse group of stakeholders to develop waste treatment and disposal pathways for large volumes of DOE legacy wastes containing special nuclear material, high concentrations of tritium and technicium-99 and other hazardous constituents. Established new processes for safe disposition of these orphan wastes also referred to as "no path to disposal" wastes.
- Applied business innovation and knowledge of waste management requirements for commercial and government nuclear clients to establish Perma-Fix as a leader in problematic waste treatment solutions.
- Collaborated with Dounreay Nuclear Facility waste management personnel and United Kingdom regulatory representatives to develop disposal requirements to support treatment of mercury-contaminated radioactive waste stored at the Dounreay Facility.

Earlier Positions

1999 - 2000 **Vice President, Sales & Marketing**

Waste Control Specialists, LLC

- Led strategic innovation to transform a permitted nuclear waste TDF from losing $1M/month to a revenue neutral enterprise by segregating low activity radioactive and hazardous wastes that met existing acceptance criteria while awaiting Nuclear Regulatory Committee approval to dispose of higher activity radioactive wastes.

1997 - 1999 **General Manager/Sales Manager**

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Allied Technology Group, Inc. (ATG)

- Managed D&D project teams addressing commercial and government nuclear waste D&D projects and radioactive waste treatment.
- Led integrated collaboration on the acquisition team for Molten Metal, Inc. and incorporated personnel and treatment capabilities into ATG capabilities.
- Managed business unit finances to ensure profitability and revenue recognition.

1993 - 1997 Customer Service Manager/Government Sales Representative

Duratek, Inc./Scientific Ecology Group

Expanded corporate business to include the DOE radioactive waste treatment service sector. Successfully negotiated and acquired the company's first DOE site contract with Lockheed Martin Energy Systems in Oak Ridge, Tennessee. Managed customer service responsibilities and participated on the transition team through the acquisition from Wes

SUMMARY

- Over 40 years' experience in management, operations, and oversight of nuclear and chemical facility operations. This experience includes operations at DOE Category 2 nuclear facilities.
- In depth knowledge of U.S. Environmental Protection Agency "Resource Conservation and Recovery Act (RCRA)" and "Toxic Substance Control Act (TSCA)" regulations.
- Managed transition of waste treatment and disposal operations at the DOE Hanford Site to ensure continuity of service for onsite waste generators upon award of the Plateau cleanup contract to CHPRC.
- Developed multiple treatment strategies for orphan mixed radioactive waste streams facilitating disposition of waste streams from DOE sites around the complex.
- Experience with radioactive, mixed, and transuranic operations, packaging, transportation, and regulatory compliance evaluations to identify compliance and improvement for commercial nuclear treatment companies.
- Subject Matter Expert testimony for environmental remediation of radioactive, mixed, and transuranic wastes.
- Design, installation of soil and groundwater remediation programs at a variety of hazardous and radioactively contaminated sites utilizing a wide variety of technologies tailored to specific site conditions.

SECURITY CLEARANCE

Uncleared

EDUCATION

Bachelor of Science, Chemical Engineering
Stevens Institute of Technology, New Jersey

PROFESSIONAL EXPERIENCE

Independent Consultant, Knoxville TN

Management consulting for organizational structure, acquisition evaluation, efficiency/cost improvement, systems development, contract dispute resolution and management. Proposal support including technical approach, cost estimating, schedule development and Technical and Cost Volume for waste management and nuclear facility operations. Current projects include consultation to Oak Ridge National Laboratory on development of waste

management strategy for high activity transuranic waste and subject matter expert supporting design of Category II hot cell facilities.

Vice President, Manager of Projects, Nuclear Services
Perma-Fix Environmental Services, Knoxville, TN

Responsible for all aspects of the operation of the Nuclear Services Division, including proposal development, estimating, pricing, procedure and program development, project execution, personnel management and financial performance. Responsible for providing project controls, estimating and scheduling support for Nuclear Services and Waste Services projects.

Led company transition as part of the CH2M Plateau Remediation Company (CHPRC) cleanup team at the Hanford Site. Perma-Fix scope included operation of onsite waste treatment and disposal operations including managing TRU operations at T Plant (Cat 2 nuclear facility), and the Low-Level (LLW) and Mixed Low-Level (MLLW) burial grounds. Led the effort to develop a new strategy for offsite treatment of large CH-TRU containers at the Perma-Fix commercial nuclear facility. This strategy saved DOE over $350Millon by avoiding the cost of building new onsite treatment capabilities for CH TRU wastes.

Developed, engineered, and deployed technical solutions for complex mixed wastes generated during cleanup at government, commercial and international facilities. Examples included developing a system used at the Portsmouth Gaseous Diffusion Plant for down-blending highly enriched Uranium; Mercury (Hg) amalgamation mobile system for treatment of United Kingdom Elemental Hg wastes; and, a system to identify and remove Plutonium contaminated soils on a commercial industrial site.

Responsible for regulatory interfaces, plan development through regulatory approval for remediation of soil and groundwater at Perma-Fix owned sites, as well as Perma-Fix work at customer sites, including both hazardous and radioactive constituents of concern. Managed associated regulatory relationships through acceptance of final closure.

Senior Vice President
ATG Corporation, Oak Ridge TN and Richland WA

Responsible for marketing, sales, strategic planning and material stewardship. Responsible for the full-service radioactive, wet waste processing, equipment and remediation facilities in Tennessee. Responsible for field service operations in the commercial nuclear power and decommissioning arenas. Overall management of the Richland, WA facility, including all aspects of the Low Level and Mixed Radioactive Waste processing facilities, including physical completion and startup of Non-Thermal and Thermal Mixed Waste operations.

Chief Operating Officer

Med Images, Inc., Knoxville, TN

Managed all operations for this image-based, integrated medical documentation and information management startup. Developed software to prolong the life of installed technology.

Chief Operating Officer
Quadrex Corporation, Oak Ridge, TN

Responsible for all operating divisions of this Corporation, including environmental, nuclear waste processing and nuclear engineering divisions. Responsible for over 500 engineering, technical, health and safety, quality assurance, regulatory compliance, operations, maintenance and accountingpersonnel. Responsible for turnaround and ultimate success of Quadrex's full-service nuclear decontamination facility in Oak Ridge, TN. The facility operations, governed by radioactive materials licenses in highly regulated and audited industries, served the nuclear power, DOE, and commercial nuclear wasteindustries.

Plant Manger
FMC Corporation – Chemicals Group

Managed multiple U.S. and international chemical plants.

CERTIFICATIONS, AWARDS, AND TRAINING

- Patent – US9,381,552B1 Method and Apparatus for Recovery of Subsurface Free Mercury and Decontaminating a Substrate
- Radworker II

LONGENECKER & ASSOCIATES

KATHRYN ROBERTS

EXPERIENCE SUMMARY

Ms. Roberts is a recognized regulatory and public outreach expert with more than 22 years of environmental leadership, innovative management, compliance and technical expertise related to regulatory matters (e.g., RCRA, CERCLA, NEPA), operating licensees and management or regulation of contaminated soil, surface/ground water and facilities. In addition to serving as a cabinet-appointed regulatory division director managing an approximately 200 employee organization, her experience includes 20 years managing, coordinating and communicating between State and Federal agencies (e.g., EPA, DOE), Congressional delegation, State legislators, Indian Pueblos, local municipal governments and a wide range of other stakeholders, including activist groups and non-profit organizations. She possesses broad experience and knowledge of the regulatory structure and strategy for characterization, treatment, shipment and disposal of transuranic waste. In addition to being the primary regulator of the Waste Isolation Pilot Plant (WIPP), she led the negotiation of the Settlement Agreement and Consent Order following WIPP's radiological events and was regulatory lead for the restart of WIPP operations. She has deep understanding of transuranic waste certification and acceptance requirements and the innovative strategies necessary to safely and efficiently disposition transuranic waste across the DOE generator site complex.

Her regulatory responsibilities have included oversight of complex DOE sites and facilities, including contaminated facility decommissioning and demolition, remediation of diverse contaminated media and resultant hazardous and radioactive wastes streams, as well as radioactive disposal facilities, including WIPP. She is unique in that she has been involved with RCRA regulated facilities and contamination both as a regulator (with State of New Mexico) and as a manager of the regulated facilities and sites (while with LANL and N3B).

Most notably, she was the lead negotiator and author for the New Mexico Environment Department (NMED) on the 2016 Consent Order for Los Alamos National Laboratory (LANL). This document was revolutionary for legacy cleanup at LANL because, unlike its predecessor, it established an effective structure for accomplishing work on a risk-informed, priority basis through the "Campaign Approach", which allows for the addition and/or adjustment of campaigns and milestones via the "annual planning process" and facilitates cooperation and exchange of information between the regulator and the site. This benchmark agreement implements proven best practices from successful DOE site closures (e.g. Rocky Flats) and defines shared responsibilities between signatories to identify strategies and resolve technical issues to achieve cleanup progress.

DETAILED EXPERIENCE

Vice President, Regulatory Assurance – Longenecker & Associates January 2020 – Present

Ms. Roberts led the establishment and implementation of L&A's Regulatory Assurance business line to deliver best in class regulatory strategy and subject matter experts to DOE and NNSA projects and sites to enable mission goals. She currently performs and manages other experts in delivery of high impact environmental regulatory strategy and support tasks at Los Alamos Legacy Cleanup Contract (LLCC), Los Alamos M&O, Savannah River Site, Oak Ridge, Nevada M&O and DOE-EM Headquarters. This work includes interactions with senior officials and decision makers in cognizant state agencies, EPA regions, DOE site leadership and DOE Headquarters to deliver effective regulatory approaches to support EM mission success. She and her team proactively identify issues and assist sites in resolving disagreements where they already exist and assists DOE in establishing new and innovative ways to collaborate with its regulators and other stakeholders. Additionally, she and her team have led or participated on several assessments in the areas of waste management, environmental/regulatory compliance, procedure exceptions and variances, as well as a root cause analysis of a NPDES non-compliance. As Vice President of Regulatory Assurance, Ms. Roberts oversees L&A's work scope for all current contracts in the area of environmental regulatory compliance and support. She is responsible for business development, interacting with clients, and general oversight of L&A staff and subcontractors performing regulatory assurance work scope.

Recent Projects

<u>EM-LA Strategic Vision – June 2022 - Present</u>

Longenecker and Associates (L&A) was tasked (and Ms. Roberts leads) with developing and implementing a Strategic Vision for the Environmental Management Los Alamos Field Office (EM-LA). The Strategic Vision is a four Phase initiative intended to align stakeholder feedback (i.e., values and priorities) with the Los Alamos Legacy Cleanup Contract's (LLCC's) option year performance baseline(s) and associated project specifics, regulatory interfaces and expected funding. It will be used to help prioritize, integrate, and optimize program activities. As part of the initiative, we engaged with 16 individual stakeholder groups in northern NM, including four Indian Pueblos, 178 individuals and received over 2,000 comments to process and incorporate into the Strategic Vision.

USACE – Bradford Island – April 2022 – February 2024

As part of the US Army Corps of Engineers (USACE) cleanup under CERCLA at Bradford Island in Cascade Locks, Oregon, L&A along with its teaming partner, Balcom Environmental, was tasked with supporting the USACE's Community Involvement Program. As part of this task, L&A conducted community interviews to inform a Community Interview Report; updated the current Community Involvement Plan; prepared materials, scheduled and facilitated public meetings; established a Community Advisory Group (CAG) and facilitated their meetings and; prepared fact sheets and other educational materials for dissemination to the public.

Senior Associate– Longenecker & Associates **January 2017 – January 2020**

As a senior associate based in NM, Ms. Roberts was, and continues to be, responsible for maintaining communications and outreach efforts with local, state and federal agencies, NM State Legislators, NM Congressional delegation and community and regional development organizations. She provided expert technical, regulatory (primarily RCRA and Clean Water Act (CWA)) and stakeholder support and advice to L&A projects throughout the complex, but primarily at Los Alamos, WIPP and Sandia. She was a Lead Reviewer for L&A on the inaugural Waste Isolation Pilot Plant (WIPP) Triennial Review. The Triennial Review is a Supplemental Environmental Project required by the Settlement Agreement between the New Mexico Environment Department and the DOE resulting from violations of their RCRA permits. The Triennial Review evaluated WIPP's environmental compliance across several areas, including hazardous waste management and groundwater protection.

Projects

Los Alamos Legacy Cleanup Contract (LLCC) - She served as the Deputy Project Manager for L&A's work on the Los Alamos Legacy Cleanup Contract (LLCC). As Deputy PM, she was responsible for contract administration, interacting with the client, (Newport News Nuclear N3B-

Los Alamos, LLC (N3B)) and DOE Site Office (EM-LA)) and general oversight of all L&A staff performing work under the LLCC. She is also a performer under the LLCC. She provides full-time support to N3B's Contact-Handled – Transuranic Waste program (CH-TRU) in the area of regulatory compliance and strategy. She is tasked with developing RCRA-permitting strategies that will allow the waste processing lines to compliantly treat multiple waste streams ultimately bound for WIPP. She also serves as a liaison between the CH-TRU program and the Regulatory Compliance group to help facilitate discussions on daily environmental compliance issues (e.g., RCRA, NPDES, Air, etc.) as well as regulatory coordination strategy development.

Transitions for LLCC and LANL M&O - Ms. Roberts supported the transition teams for both Los Alamos prime contracts. She played a key role on the transition team for the LLCC from January

2018 – April 2018. She supported N3B in the planning and implementation of the transition including working closely with all parties to identify and address hundreds of interface questions regarding employees and functions split between the LLCC and the M&O contract. Additionally, she was asked to fill in as the acting Regulatory Compliance Director for N3B until a permanent replacement was hired (July of 2018). In this role, she was responsible for environmental compliance for N3B's two core mission programs – Environmental Remediation (ER) and CH-TRU. On the transition team for the Los Alamos M&O contract (Triad), she was responsible for ensuring all permits (i.e., RCRA, NPDES, Air, Groundwater Discharge, etc.) and other regulatory requirements were successfully transferred from the previous M&O contractor to Triad. All requirements were transferred on time or ahead of schedule.

Deep Borehole Project- Alamogordo, NM Site- From January 2017 through June 2017, Ms. Roberts served as the Public Outreach Liaison for one of the four Deep Borehole Field Test (DBFT) sites awarded by DOE. The DBFT site was near Alamogordo, NM. The DBFT project was designed to study the feasibility of engineering deep boreholes for final disposal of radioactive waste. One of the field test's main purposes was to collect data on the type of rocks, the chemistry of the water, the depths to these rocks and water, the temperature of the rocks and other geologic data to see if nuclear waste disposal would be feasible in this kind of geology. Ms. Roberts was responsible for planning and managing the public outreach activities for the project. She was responsible for responding to stakeholder inquiries via email and those received through the project website; developing presentations and facilitating public meetings and coordinating with NM State legislators and the New Mexico Congressional delegation (i.e., Senator Udall, Senator Heinrich, Rep. Lujan-Grisham, Rep. Ben Ray Lujan and Rep. Steve Pearce), to obtain their support for the project and/or respond to their concerns. Her role was also heavily focused on interfacing with local municipal leaders (e.g., City of Alamogordo, Otero County Commission) and business owners (e.g., local Rotary Clubs) to explain the project and, per request from DOE, obtain support for the project from the local community. In this role she consistently responded to media inquiries from local newspapers and tv stations and coordinated interviews between media outlets and project personnel.

Director, Resource Protection Division – New Mexico Environment Department (NMED)
Santa Fe, NM **January 2015-January 2017**

Appointed by the Governor, Ms. Roberts served as the Resource Protection Division (RPD) Director for the New Mexico Environment Department (NMED). She managed four Bureaus (Hazardous Waste; Solid Waste, Petroleum Storage Tanks; DOE-Oversight) and approximately 200 employees. She oversaw regulatory compliance activities and rendered regulatory decisions for three complex federal facilities --Los Alamos National Laboratory (LANL), Sandia National Laboratory- New Mexico (SNL) and WIPP as well as numerous generators and owners/operators of all RCRA treatment storage and disposal facilities (TSDF), all owners/operators of solid waste facilities, including private and municipal landfills and transfer stations, all owners/operators of

underground and aboveground petroleum storage tanks (e.g., commercial gas stations, private owners), and independent air, water and soil sampling. She was also the New Mexico representative on the Rocky Mountain Low Level Radioactive Waste Board, which included representation from Colorado, New Mexico and Nevada. She represented NMED in the DOE-EPA-State dialogue conversations, which were undertaken to improve working relationships and identify and resolve common issues across the DOE complex. There, she was able to establish enduring relationships with her counterparts in neighboring States with DOE facilities, such as Nevada and Idaho.

During her tenure as RPD Director, she served as the primary liaison for NMED with local stakeholders, community groups, regulated entities, State legislators and New Mexico's Congressional delegation on a wide range of environmental compliance issues associated with hazardous waste management and TSDFs. She served as the primary point of contact between NMED and all three federal facilities in the State. Interactions occurred on a daily basis. Ms. Roberts frequently presented at State Legislative Committees, community meetings and to the public to address hazardous waste management, waste storage and related implementing laws and regulations. She was also integral in final remediation decisions for major RCRA closure sites, such as the Mixed Waste Landfill at Sandia. Following review of all data and public comments, she authored the order outlining the final decision for the NMED Secretary's signature. Ultimately, the final remedy for the Mixed Waste Landfill included a four-layer evapotranspiration cover, extensive soil, groundwater and soil vapor monitoring and a requirement that Sandia evaluate the effectiveness of the final remedy every five years.

Based on her extensive field experience, the NMED Cabinet Secretary asked her to lead the inspection team that performed the final inspection of WIPP (prior to reopening) following the February 2014 breached drum event. Following a week-long series of visual inspections of the facilities and performing document reviews, Ms. Roberts approved for the site to resume operations.

Ms. Roberts had several highly recognized accomplishments during her tenure as RPD Director. She successfully negotiated/authored the following agreements and/or regulatory documents:

- 2016 Compliance Order on Consent (Consent Order) for LANL legacy cleanup activities. This is the regulatory document which drives the scope of the LANL legacy cleanup program. This document was an innovative approach to cleanup because it provided a framework for organizing work ("Campaign Approach"), facilitated cooperation between LANL and NMED, and promotes focused attention on cleanup activities and attainable results.
- Settlement agreements between the State of New Mexico and the DOE for both LANL and WIPP for violations of RCRA (due to the WIPP event).

- Oversaw development of the Work Plans and Scope and Guidelines documents for the Supplemental Environmental Projects and Triennial Reviews at WIPP and LANL.
- First ever Cooperative Agreement and Memorandum of Agreement with the United States Air Force for $750K in supplemental fees to fund NMED staff.
- Settlement of legal mediation with Western Refining, Inc. for violations of RCRA.

Group Leader – Los Alamos National Laboratory (LANL)-Environmental Programs
Los Alamos, NM **September 2010-December 2014**

Served as Group Leader for the Regulatory Support and Performance group within the Associate Directorate for Environmental Programs (ADEP) at LANL. Responsible for interpretation, development and implementation of laboratory wide regulatory programs under RCRA and the Clean Water Act (CWA), including strategic direction and implementation. Her management of regulatory matters for the ~$3B/yr LANL missions were diverse and vital to success of both environmental and national security missions of the laboratory. Managed performance evaluations and work assignments for 20 people. Managed regulatory support and deliverable compliance for legacy cleanup work conducted under the Consent Order, CWA and the processing and shipping of hazardous waste associated with those projects. Projects where Ms. Roberts' group was responsible for regulatory compliance and strategy ranged from the decontamination and decommissioning work at TA-21, to implementing the presumptive remedy at Material Disposal Area (MDA) B, to both major groundwater cleanup projects (i.e., chromium and RDX). Acted as primary liaison between LANL, state agencies and stakeholders including elected officials, community groups, and Native American Pueblos bordering LANL on a wide range of environmental compliance issues. Negotiated with state and federal agencies (e.g., NMED, DOE, and EPA) on technical and regulatory issues related to environmental cleanup. Provided regulatory support and expertise for remediation projects across LANL. Managed the Quality Assurance (QA) and Contractor Assurance programs and staff for ADEP. Managed budget, schedule, cost commitments and resource planning.

Supervisor – New Mexico Environment Department (NMED)-Hazardous Waste Bureau
Santa Fe, NM **May 2004-September 2010**

Supervised four project leaders on corrective action under the Consent Order and permitting activities for LANL and White Sands Missile Range under the RCRA. Reviewed all assigned permit applications, permit modification requests, corrective action work plans, corrective action reports, and other documents submitted by LANL for evaluation of technical adequacy. Drafted correspondence such as, Notices of Deficiency, letters of approval and disapproval regarding technical and regulatory adequacy issues, Notices of Violation, and other compliance and enforcement documents. Inspected, toured, and consulted with LANL regarding various corrective action sites. Frequent interactions and meetings between DOE (and its contractor).

Environmental Compliance Analyst – Hawk Engineering, P.C. Binghamton, NY
June 2001-November 2003

Completed Environmental Assessment Forms, Draft Environmental Impact Statements (DEIS) and Phase 1 Environmental Site Assessments; performed annual inspections for landfills involved in post-closure care activities and supervised drilling operations, evaluated soil samples and supervised installation of groundwater monitoring wells.

EDUCATION

Master of Science, Environmental Management, 2011, Duke University

- Masters' Thesis – "*Public Participation in the Environmental Permitting Process: Development of a Public Involvement Plan (PIP) for Stakeholders in Northern New Mexico"*

Bachelor of Arts, Environmental Geography, 2001, Colgate University

SPECIAL TRAINING

- OSHA-40 Hour Hazwoper
- RCRA Hazardous Waste Regulations
- Former Q Clearance

BOARDS/MEMBERSHIPS/AWARDS

- Secretary, Regional Institute of Health and Environmental Leadership (RIHEL), 12/2017 – present
- Alumni Council, Chair – District Clubs Committee, Colgate University, 2010-2014
- Panelist – Colgate SophoMORE Connections program. Program provides second-year students an opportunity to explore their academic and career interests through conversations with alumni, faculty, staff, and upperclassmen. 2005 - present
- Maroon Citation – 2016. Awarded in recognition of significant and invaluable personal (i.e., record of service) contributions to Colgate University.
- President, Colgate Alumni Admission Program (AAP) of New Mexico. AAP members volunteer as representatives at college fairs, by conducting informational interviews, and by helping with area receptions for prospective and accepted students. Members of the AAP serve as primary resources for prospective students.
- President, Colgate Alumni Club of New Mexico

LONGENECKER & ASSOCIATES

DAVID E. WILSON, JR., P.E.

EXPERIENCE HIGHLIGHTS

- Led negotiation of the initial Savannah River Site {SRS) Federal Facility Agreement for the South Carolina Department of Health and Environmental Control and many subsequent agreements.
- Conceived of regulatory strategy to manage SRS Liquid Waste Tanks under a wastewater permit, allowing for flexibility in hazardous waste requirements.
- Served as the Governor's policy representative to the National Governors Association Department of Energy Federal Facility Task Force from 2000 through 2018.
- Worked with Senator Graham's office in passage of Section 3116 of the 2005 National Defense Authorization Act addressing Liquid Waste residuals.
- Negotiated common goals and values and treatment strategy for Liquid Waste with SRS, the Governor's Nuclear Advisory Council, and the Defense Nuclear Facility Safety Board in 2005.
- Commended by Assistant Secretary Triay in 2010 letter to Governor-Elect Haley for collaboration in SRS Liquid Waste treatment and tank closure strategy.
- Directed an agency of over 3,200 employees operating at 99 locations with a budget of over $620 million. Managed agency responsibilities touching on more than 360 state and federal statutes, regulations, and state provisos.

DETAILED EXPERIENCE

Senior Strategist, Longenecker & Associates, Inc. **AUG 2020-PRESENT**

Leads and supports L&A projects and activities to develop technical and strategic plans to meet mission goals. Support leadership of the Regulatory Center of Excellence at the Savannah River National Laboratory. Identifies alternatives to optimize environmental cleanup plans to reduce technical, worker and regulatory risk, while reducing lifecycle cost and schedule. Conducts organizational and programmatic assessments to identify improvements and sustain performance despite foreseeable challenges, including providing advice on financial/budgetary planning, emergency preparedness, legal and regulatory strategies.

Senior Legislative/Policy Specialist/National Affairs Coordinator
South Carolina Farm Bureau Federation (SCFB) **JAN 2019-JULY 2020**

- Discuss issues of concern for the agricultural industry in South Carolina with the State congressional delegation and staff.
- Coordinate activities of the SCFB National Legislative Committee.
- Represent the SCFB at various State and national meetings and events.
- Provide input on policy direction.

Acting Director
South Carolina Department of Health and Environmental Control (DHEC) **AUG 2018-DEC 2019**

- Established and maintained relationships with the Governor and with lawmakers across South Carolina and provided data needed to support effective policy development.

- Represented DHEC before the legislature, providing needed data and an understanding of health and environmental issues affecting the state, allowing for informed decision making and policy development impacting South Carolinians.
- Represented DHEC during budget hearings; advocated for DHEC resource needs and the value of services provided by DHEC.
- Evaluated organizational capacity needs and provided direction to address needs related to budget, staffing levels, professional development, succession planning, and organizational efficiency.
- Maintained DHEC's fiscal integrity by realigning budgets, ensuring effective use of taxpayer, grant, and foundation funding, and operating DHEC within the approved budget.

Senior Director - Legislative Affairs
S.C. Department of Health and Environmental Control **JAN 2016-AUG 2018**

- Evaluated proposed legislation for potential impact on the agency mission and programs.
- Informed Director, Board, and staff of legislation.
- Tracked legislation that affects the Agency.
- Testified and provided information to legislators and legislative committees to help ensure progress of proposed legislation and regulations.
- Tracked annual proposed budget with the Governor's Office and Legislature.
- Addressed constituent concerns for Legislature regarding agency issues.

Chief - Bureau of Water
S.C. Department of Health and Environmental Control **2006-JAN 2016**

- Planned, managed, and directed the overall functions of the Bureau, including programmatic and administrative activities.
- Established program goals, priorities, and resource needs to carry out the mission of the Bureau.
- Identified the need for and developed policies and procedures; ensured coordination with other Bureaus to promote multi-media interaction.
- Served as primary Bureau contact for the Environmental Protection Agency, legislators, Congress, Commissioner, Deputy Commissioner, and the Board.
- Testified before the Legislature and made presentations to the Board.
- Served on national, regional, and local committees and workgroups.
- Oversaw the Savannah River Site Liquid Waste Tank Industrial Wastewater Permit and tank closure plans.

Assistant Chief - Bureau of Land and Waste Management
S.C. Department of Health and Environmental Control **1993-2006**

- Managed the hazardous waste, infectious waste, solid waste, radioactive waste and mining programs, including permitting, compliance and enforcement activities.
- Supervised the daily activities of Division Directors and other staff.
- Oversaw the administrative functions of the Bureau.
- Ensured that policies and procedures were in compliance with State, Federal and agency requirements.

- Ensured timely cleanup of federal facilities through partnering, including Savannah River Site liquid waste and soil and groundwater cleanup.

Director - Division of Waste Management
S.C. Department of Health and Environmental Control **1991-1993**

- Ensured all hazardous waste permits were issued consistent with State and Federal laws and regulations.
- Ensured the infectious waste program was developed and implemented in accordance with applicable law and regulation.
- Managed development of the Federal Facility Agreement with the Savannah River Site and oversight of SRS cleanup and waste management.
- Coordinated revisions of the Hazardous Waste Management Regulations and applications for hazardous waste program authorization from the Environmental Protection Agency.
- Guided management, technical staff, and legal office in complicated legal proceedings involving the hazardous waste program.

Manager - Hazardous Waste Permitting Section
S.C. Department of Health and Environmental Control **1987-1991**

- Ensured consistency with activities of engineering staff in permitting treatment, storage, and disposal facilities.
- Conducted technical reviews of permit applications for complex hazardous waste management facilities.
- Coordinated the functions of the South Carolina Hazardous Waste Task Force.
- Represented the S.C. Department of Health and Environmental Control in hazardous waste issues addressed by the State Legislature and the court system.

Engineer Associate/Engineer
S.C. Department of Health and Environmental Control **1982-1987**

- Performed technical review of facility wastewater management plans.
- Reviewed hazardous waste permit applications.
- Provided technical assistance to public officials, engineers, and others as requested.

EDUCATION

University of South Carolina, Master of Science, Civil Engineering, 1982
University of South Carolina, Bachelor of Science, Civil Engineering, 1981

LICENSE

Licensed South Carolina Professional Engineer

LONGENECKER & ASSOCIATES

Brian T. Hennessey

EXPERIENCE SUMMARY

ENVIRONMENTAL CLEANUP ~
REGULATORY COMMUNICATION AND PROCESS IMPROVEMENT

Environmental specialist with expertise in US Department of Energy (DOE) facility remedial investigation, assessment, and remediation practices and policies. Adept and highly successful in creating and maintaining collaborative, productive regulatory relationships and streamlining the cleanup documentation and decision-making processes. Experienced and skilled at communicating, negotiating, and promoting complex environmental concepts to regulators and stakeholders. Industry-recognized subject matter expert in Core Team methodology and its application at DOE-Environmental Management (EM) facilities.

DETAILED EXPERIENCE

Federal Facility Agreement Program Manager **January 1993-PRESENT**
DOE-Savannah River (SR)
Office of infrastructure & Environmental Stewardship,
Remediation and Deactivation & Decommissioning Division

- Serve as the principal Savannah River Site (SRS) negotiator of environmental cleanup strategies and schedules with regulators.
  - Lead/advise the SRS project teams in the preparation of regulatory strategies and documents and the execution of environmental assessments and cleanup projects
  - Oversee the development of consensus technical protocols that standardize all aspects of the cleanup assessment process
- Plan and implement the DOE-SR program ($50-100M per year) for the cleanup of radioactive and hazardous waste release sites and the decommissioning of inactive facilities under the SRS Federal Facility Agreement (FFA) with DOE, the Environmental Protection Agency (EPA), and the South Carolina Department of Health and Environmental Control (SCDHEC).
- Ensure compliance with environmental regulations, achieve all milestones and deadlines enforceable under the FFA, and implement DOE-EM program direction.

- Communicate information on cleanup program status, projects, and concepts to the SRS Citizens Advisory Board, Defense Nuclear Facilities Safety Board, and DOE Headquarters program managers.
- Serve as the DOE-EM subject matter expert in Core Team methodology and its application at EM facilities.

Selected Achievements as FFA Program Manager:

- Incorporated the *DOE Principles of Environmental Restoration* into the SR program, and instituted a successful Core Team process that has streamlined decision making and promoted continuous collaboration and open communication among DOE and the regulatory agencies.
- Led or co-presented training workshops on using the *DOE Principles of Environmental Restoration* for streamlining cleanup projects, including the Core Team Method and the Scoping of Cleanup Documents and Decisions:
  - DOE-EM Environmental Compliance Community of Practice – 2023
  - EPA Superfund Legacy Learning Series video – 2022
  - Waste Management Symposia – 2020
  - National webinars for EPA's Federal Facilities Restoration & Reuse Office – 2020
  - EM-Los Alamos onsite Core Team Orientation/Document Scoping – 2018

- One hundred percent of SRS regulatory milestones met early or on time.
- Negotiated a Memorandum of Agreement with EPA and SCDHEC that commits all parties to innovative cleanup-accelerating approaches, including the Area Completion Strategy integrating facility decommissioning projects with soil/groundwater assessment and cleanup.
- Negotiated a strategy for the graded application of CERCLA to facility decommissioning.
- Negotiated and established the *Land Use Control Assurance Plan for the Savannah River Site* detailing the institutional land use controls that enable SRS to clean up to non-residential levels while ensuring the protectiveness of remedies over time
- Negotiated the acceptability of CERCLA waste disposal in the SRS low-level waste (LLW) facility at significant cost savings compared to off-site LLW disposal.
- Served a DOE detail as Environmental Permit Manager in the EM-Los Alamos Field Office from October 2015 – March 2016, assisting site and EM-Headquarters staffs in renegotiating the LANL RCRA Consent Order to streamline the cleanup regulatory process.
- Received Special Recognition Awards from EPA:
  - National Notable Achievement Award (2004) given to the Federal Facility Response Team of the Year—DOE-SR, EPA, and SCDHEC
  - Cost Saving Award (DOE/SCDHEC/EPA Team) from the EPA-HQ Office of Solid

Waste and Emergency Response (OSWER)

Quality Assurance Specialist **April 1990 to January 1993**
USDOE, Office of New Production Reactor
Office of Safety and Quality

- Performed quality assurance (QA) audits of design contractors for the New Production Reactor (NPR) program and approved corrective action plans for audit findings.
- Planned and participated in informal assessments of organizations performing research supporting NPR.
- Identified quality assurance requirements appropriate for environmental monitoring and compliance- related work.
- Produced the SRS site-specific volume of the NPR *Environmental Compliance Plan*.
- Prepared responses to public comments on the *Draft Environmental Impact Statement for the Siting, Construction, and Operation of New Production Reactor Capacity*.

Quality Control/Quality Assurance Specialist **October 1978 to April 1990**

- Served at four commercial nuclear power plants during construction and start-up, as a QA specialist verifying completion and proper documentation of nuclear safety-related systems and components.
- Supervised up to fifteen construction materials testing laboratory technicians at the Hope Creek Nuclear Generating Station project.

EDUCATION

1976 – Bachelor of Science
Biology, Psychology
Marietta College, Marietta OH

1986 – Certificate
Writing and Editing
North Carolina State University, Raleigh NC

SELECTED ACCOMPLISHMENTS

2023 Special Recognition Award (DOE-SR) for *2022 High-Level Waste Tank Milestones Agreement*
2015 Special Recognition Award (DOE-SR) for *Tank Closure Dispute Resolution Team*
2010 Special Recognition Award (DOE-SR) for leadership in accelerating cleanup under the American Recovery & Reinvestment Act (multiple projects)
2004 EPA National Notable Achievement Award (OSWER) – *Federal Facility Response Team of the Year: DOE-Savannah River Site*

2003 Special Recognition Award (DOE-SR) for development of Area Closure approach, supporting accelerated EM completion and NPL deletion at the Savannah River Site

PUBLICATIONS

(Hennessey, B.) and Looney, B.; Bergren, C.; Gaughan, T.; Aylward, R.; 2013, *Environmental Stewardship at the Savannah River Site: Generations of Success*; Waste Management 2013 Symposia

(Hennessey, B.) and Freeman, C.; Bergren, C.; Burch, J.; Flora, M.; Socha, R.; 2013, *Achieving Accelerated Cleanup of Cesium-Contaminated Stream at the SRS*; Waste Management 2013 Symposia

References available upon request.

ASHLEY FURMAN

EXPERIENCE SUMMARY

Mrs. Furman has over 4 years' experience with Longenecker and Associates working on various projects at Idaho National Lab (INL) supporting the Spent Fuel Handling Project (SFHP), at Los Alamos National Laboratory (LANL) supporting both the Management and Operations contract (TRIAD) and the Legacy Cleanup contract (N3B), and at other sites that L&A is involved in. She is also involved with L&A's active efforts in international collaboration between the trilateral of the U.S., U.K., and Canada. Her current position is a Project Support Engineer. Her most recent work includes subcontractor support to Granite Construction's concrete placements for the Spent Fuel Handling Project at INL, where she was the team lead for the placement turnover document packages and has helped perform document control and audit support.

Prior to joining L&A, Mrs. Furman completed multiple internships throughout her student career, one of which was at WIPP in the radiological controls and emergency management departments, where her research into the viability of the Canberra iSolo alpha/beta detector led to its use in radionuclide determination from the air filters of incoming TRUPACT containers. She also helped plan, write, and organize the Master Scenario Events List for the annual WIPP Drill and Exercise.

DETAILED EXPERIENCE

- **Project Support Engineer – Longenecker and Associates**

2022-PRESENT

Mrs. Furman has supported L&A and Granite Construction with INL's Spent Fuel Handling Project (SFHP) from March 2021 to November 2023 for the beginning construction of the spent fuel pools for the on-site Naval Reactor Facility (NRF). She became team lead for creating and finishing 1100 overdue concrete placement turnover document packages that are vital to maintain the progress and funding of the project. She was critical to the success of recovering the overdue turnover packages within 8 months, despite the pressure of project funding and a high-performance work environment. In conjunction with that role, she supported document control to review and manage the transmittal and submission of subcontractor documents, nonconformance reports, deviation notices, performance improvement notices, and to perform quality control of the submittal records. She also supported the internal audit program as an audit team member by reviewing documents, interviewing personnel, and writing audit reports. By way of this support, she received her Lead Auditor Certification in February 2023.

She has also supported smaller tasks with deliverables as the team lead. Two tasks of note are research-based and ongoing in support of Jacobs for the U.K. Nuclear Decommissioning Authority. The first task has involved extensive research on sustainability policies in the United States, both within and outside of the nuclear industry. The second task has involved research into novel technologies in North America that have potential for in-situ, real-time use in spent fuel ponds.

Mrs. Furman continues to support L&A's international collaboration efforts by taking meeting minutes, following up on attendee actions needed, and coordinating efforts for various bilateral and trilateral meetings and events between the U.S., U.K., and Canada under The Trilateral Agreement. She has organized four Waste Management Symposia panels for 'collaboration across borders' (2021-2024), one virtual and three in-person, and has organized two virtual U.S. Technology Showcases that demonstrated up-and-coming nuclear D&D technology from U.K. and U.S. sources and vendors. By way of the Trilateral Agreement, she has also had the opportunity to participate in multiple workshops. She has attended two workshops on In-Situ Decommissioning (one in-person, one virtual) and one workshop on Stakeholder Engagement.

She is currently developing the Sustainability Program policy and implementation strategy for the company.

- **Engineering Apprentice – Longenecker and Associates – Los Alamos National Laboratory**
  Los Alamos, NM

  2019-2021

  Mrs. Furman supported the L&A Program Managers of the LANL M&O work (TRIAD) and legacy cleanup work (N3B) from June 2019 to November 2020. L&A's role is to support their mission goals by providing expert services through collaboration of work scope, developing strategies, and coordinating across offices for product delivery. Mrs. Furman's specific activities included: developing proposals, recruiting SMEs, coordinating on-boarding locally (Los Alamos), and helping to ensure product delivery is timely and of high quality.

  Beginning in 2020, she began supporting L&A's international collaboration efforts by attending, taking notes, planning meetings, and coordinating efforts for various bilateral and trilateral meetings between the U.S., U.K., and Canada. Mrs. Furman has also been supporting L&A and Granite Construction with INL's Spent Fuel Handling Project (SFHP) since March 2021, where concrete is poured to create spent fuel pools for the naval nuclear facility on-site. She became team lead for creating and finishing 700+ turnover document packages for the spent fuel pool concrete placements, which are vital to maintain progress and funding of the project.

  Mrs. Furman has been a member of two technical teams conducting assessments of TRIAD's waste characterization practices at LANL and NWP's regulatory compliance at WIPP, where she was a coordinator between the team members and the end-customer and was responsible for arranging every meeting, documenting the outcomes of the meetings, managing the project expectations, and conducting personnel interviews, document reviews, and deep-dives.

- **Radiological Controls/Emergency Mgmt Intern – Nuclear Waste Partnership LLC (NWP) – Waste Isolation Pilot Plant (WIPP)**
  Carlsbad, NM SUMMER 2018

- Performed literature review and research into the optimization of the Canberra iSolo detector to determine that it is suitable and reliable to use in the analysis of radionuclides in TRUPACT RAF filters
- Researched for salt buildup on continuous air monitors in mine
- Shadowed various radiological activities at site and in mine
- Assisted in development of and performed in the site-wide DOE drill and exercise

TRAINING

- NQA-1 Lead Auditor Training (30 hours), ASME, 2022
- NQA-1 Training (16 hours), College of Eastern Idaho, 2022
- OSHA 10-Hour Construction, 2022
- RCRA Hazardous Waste Training (5-Day Course), McCoy and Associates, 2019

CERTIFICATIONS

- NQA-1 Lead Auditor, February 2023

EDUCATION

- Bachelor of Science in Nuclear Engineering, North Carolina State University
  - Minor in Russian Studies
- Pursuing Graduate Certificate in Technical Writing, University of North Texas

PROFESSIONAL MEMBERSHIPS

- American Nuclear Society
- Women in Nuclear

AWARDS

- L&A Distinguished Service Award, April 2022
- L&A Good Catch Award, October 2020
- Best in Category: Reactor Physics, ANS Student Conference, 2019
- Undergraduate Roy G. Post Foundation Scholarship, WM Symposia, 2019
- Progress Energy Nuclear Engineering Scholarship, 2016

LONGENECKER & ASSOCIATES

SHELLY WILSON

Project Role: Regulatory Advisor

Key Expertise with Community Revitalization

- SERVED OVER 10 YEARS AS STATE EX-OFFICIO MEMBER OF CITIZENS ADVISORY BOARD
- FACILITATED DIVERSE GROUPS TO ALIGNED ACTION
- FACILITATED PUBLIC MEETINGS
- FACILITATED NATIONAL REGULATORY DIALOGUE
- RESPONDED TO CITIZEN AND MEDIA REQUESTS IN PUBLIC MEETINGS

EXPERIENCE SUMMARY

Ms. Wilson is a recognized regulatory expert with 30 years of environmental leadership, strategy development, and facilitation experience related to regulatory matters (e.g., RCRA, CERCLA, NEPA). Her experience includes 30 years of strategy development and community outreach for federal and state agencies which led to accelerated cleanup at federal facilities. Ms. Wilson also led state in closure of six high level waste tanks with public support. Ms. Wilson has had extensive experience presenting at public meetings as well as responding to requests from the public, media, environmental groups, and elected officials.

RECENT DETAILED EXPERIENCE

February 2018 – Present – Senior Regulatory Specialist – Longenecker & Associates
Builds regulatory frameworks that align decision makers for progress on schedule, while integrating engagement and resolution of community concerns. Facilitated the Oak Ridge Regulatory Partnership Framework in 2020, resulting in resolution of issues enabling continued environmental cleanup progress under the Federal Facility Agreement at the Oak Ridge Reservation in Tennessee. Created content for real time website communication of air monitoring data to the community and stakeholders associated with demolition of Building X-326 at the Portsmouth site. Current Chair of the Environmental Management Advisory Board to Department of Energy which holds publicly accessible meetings.

2013-2018- Permitting and Federal Facilities Liaison – South Carolina Department of Health and Environmental Control (DHEC)
Assisted hundreds of businesses and citizens each year with a clear understanding of DHEC permit processes, technical reviews, planning timelines, and community involvement. Oversaw regulatory and policy issues related to Savannah River Site (SRS). Served as DHEC ex-officio member of the SRS Citizens Advisory Board (CAB). Led DHEC strategy for closure of six SRS high level waste tanks with public engagement, support and no legal appeals. Presented and answered questions regularly at public meetings such as SRS CAB and Governors Nuclear Advisory Council.

1990-2018 – Various Positions at DHEC
Served as primary liaison for federal facility cleanup, permitting, and compliance issues. Led hazardous waste review of SRS high level waste tank closure plan, leading to 1997 closure of first two tanks in the nation.

EDUCATION:
Bachelor of Science, Engineering, 1989, University of South Carolina