

Department of Energy

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

APR 2 9 2019

Mr. John E. Kieling, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87508-6303

Subject:

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2018 First Triennial Review for the Waste Isolation Pilot Plant,

Findings and Observations Status Report

Reference: 1)

Permittees' Letter from Todd Shrader, U.S. Department of Energy

Carlsbad Field Office, and Bruce C. Covert, Nuclear Waste

Partnership LLC, to John E. Kieling, Bureau Chief, Hazardous Waste Bureau, subject: Notification of Completion and Public Posting of the

Triennial Review Report, dated September 19, 2018

 The Settlement Agreement and Stipulated Final Order No. HWB-14-21 (CO), January 22, 2016

Dear Mr. Kieling:

The purpose of this letter is to provide the New Mexico Environmental Department (NMED) with the status of the findings and observations resulting from the first Triennial Review for the Waste Isolation Pilot Plant (WIPP). The first Triennial Review Report, which documents the results of the Triennial Review, was submitted to the NMED and made publicly available on the WIPP Information Repository on September 19, 2018 (Ref. 1).

Paragraph 34 of the Settlement Agreement and Stipulated Final Order (Ref. 2) states the following:

The Respondents, their constituent agencies, contractors and affiliates agree to address any potential regulatory violations, or operational deficiencies, that could lead to potential environmental regulatory violations, identified in the triennial reviews. NMED agrees to refrain from taking any enforcement action against the Respondents, their constituent agencies, contractors and affiliates for any potential regulatory violations, identified in the triennial reviews so long as the Respondents and their facility operators correct any deficiencies identified in the course of such reviews within sixty (60) calendar days of the finalization of each triennial review report...

Therefore, in accordance with Paragraph 34, deficiencies identified during the Triennial Review were required to be corrected no later than November 17, 2018.

Enclosed is the report entitled, 2018 First Triennial Review for the Waste Isolation Pilot Plant, Findings and Observations Status Report. The report describes the corrective actions taken to address the findings resulting from the Triennial Review and demonstrates that these corrective actions were completed and findings considered closed on November 13, 2018. The report also discusses the Permittees' status of the observations resulting from the Triennial Review.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

Sincerely,

Signatures on file

Todd Shrader, Manager Carlsbad Field Office

Bruce C. Covert, Project Manager Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

R. Maestas, NMED *ED
D. Biswell, NMED ED
M. McLean, NMED ED
CBFO M&RC

*ED denotes electronic distribution

2018 First Triennial Review for the Waste Isolation Pilot Plant Findings and Observations Status Report

1.0 Introduction

The purpose of this report is to document closure of the findings and observations resulting from the first Triennial Review (Review) for the Waste Isolation Pilot Plant. Pursuant to the Settlement Agreement and Stipulated Final Order (SFO), No. HWB-14-21 (CO), Paragraph 34, an independent, external triennial review of environmental regulatory compliance and operations was contracted. The Review was conducted pursuant to the Triennial Review Scope of Work and Guidelines approved by the New Mexico Environment Department (NMED) on February 3, 2017. The first Triennial Review Report, which documents the results of the Review, was submitted to NMED and made publicly available on the WIPP Information Repository on September 19, 2018.

2.0 Triennial Review Findings and Observations

The Review Team identified five findings and two observations for the Permittees' consideration. The findings and observations are listed below:

- Finding 1: Panel Closure Schedule Requires Update
- Finding 2: No List of Employees by Resource Conservation and Recovery Act (RCRA) Permit Job Title
- Finding 3: Inspections of Fire-Related Systems Do Not Specifically Meet Permit Requirements
- Finding 4: Failure to Assure that Employees Meet Permit Required Training
- Finding 5: Discharge Permit 831 (DP-831) Fence and Sign Inspections
- Observation 1: Need for Additional Assurance that Permitted Waste Volumes in the Waste Handling Building (WHB) and Parking Area Unit (PAU) are Not Exceeded
- Observation 2: Formalizing DP 831 Requirements in Procedures or Desk Instructions

The findings and observations have been addressed by the Permittees as described below. The findings and observations are considered closed. Note that the findings, recommendations, and observations listed below are direct quotes from the Triennial Review Report and are shown in italicized text.

Finding 1: Panel Closure Schedule Requires Update

Permit Part 6, Closure Requirements, and associated Attachment G, Closure Plan, define both the approach to and the anticipated completion dates for closure of Panels 1 through 6. The Permit that was in effect at the time of the Review described the date (June 30, 2018) by which that closure was anticipated to be completed. The Review Team reviewed the pending Class 3 Permit Modification Request (PMR) for panel closure, which was under review by NMED, to evaluate whether the proposed changes would provide relief from the June 30, 2018, closure date. At the time of the Review, the pending PMR (nor any other PMRs currently pending NMED review) did not propose revisions to the June 30, 2018, compliance date. Therefore, the team concluded that, without approval of a Permit modification to extend the date for final closure of Panels 1-6, a Permit non-compliance would occur on June 30, 2018.

Corrective Action Taken

The corrective action was completed by the Permittees prior to issuance of the Triennial Review Report. Closure of this finding was documented in the Triennial Review Report Recommendation for Finding 1, as shown below:

The Permittees developed and submitted a Class 1* PMR that proposed revisions to Table G-1 - Anticipated Earliest Closure Dates for Underground HWDUs. This modification was submitted to NMED on June 4, 2018. NMED approved the Class 1* PMR on June 29, 2018. On that basis, this finding is closed.

Finding 2: No List of Employees by RCRA Permit Job Title

"Permit Attachment F – Training Plan, requires that there be a current list of employees by Permit job title maintained at the facility. When requested by the Review Team, no list existed. Subsequently, a list was developed. That list was used in activities related to review of the criteria for Permit Attachment E - Inspection Schedule, Process and Forms, and Attachment F - Personnel Training.

On March 23, 2018, a Class 2 PMR that completely redefined the training requirements for hazardous waste management personnel at the WIPP facility was approved by NMED."

Corrective Action Taken

The Permittees automated the process for providing a list of employees by Permit job title so that a list may be generated at any time upon request. The automated system has been developed, tested, and populated. The list displays personnel by employee name that hold the six job positions outlined in the current Permit Attachment F, Facility Personnel Permit Training Program. This report is automated and can be generated real-time upon request. The listing of personnel is consistent with the requirement of 40 CFR §264.16(d)(1) and the current Permit. This corrective action was completed on November 13, 2018, position list generated by the automated system is attached.

Finding 3: Inspections of Fire-Related Systems Do Not Specifically Meet Permit Requirements

"Multiple sources reported that inspections of some fire-related systems are not being conducted by personnel qualified in compliance with the Permit. Upon review of training and inspection records, the Review Team determined that Permit training for some inspectors was not in compliance with Permit requirements. Specifically, only four of the Fire Protection Technicians (FPTs) had completed FPT-01, Fire Protection Technician Qualification Card as required by the Permit. In addition, FPTs not qualified under FPT-01 were participating in inspections required under Permit Attachment E.

In investigating the issue, a meeting was held with the Fire Department (FD) and Fire Protection Engineering (FPE). A history was presented, as follows:

- It was determined that at a point in the past the FPTs lacked the required National Institute of Certification of Engineering Technologies (NICET) certification and that the inspection responsibility was transferred to Fire Protection Engineering (FPE). At that time the FPT-01 Qualification Card was terminated.
- At a later date, the approach was modified, with both an FPT and FPE conducting the inspections, with the FPE providing the required certification.

 Both parties sign the inspection reports. In addition, a set of new training requirements for FPTs has been developed (FPS-01-01 through 04). FPTs are currently working through those requirements.

A Class 2 PMR that redefined the training requirements for WIPP was approved by NMED on March 23, 2018. The Review Team has not evaluated the new training requirements. However, NWP staff have stated that they are addressing remaining training gaps during the implementation phase for the new Permit training program."

Corrective Action Taken

When the Class 2 PMR, *Training Program Revisions*, was approved by the NMED, the legacy Fire Protection Technician job position and associated training requirements were removed from the Permit. The revised Permit training program streamlined the training requirements for personnel performing Permit-specified equipment inspections. A general job title of "Inspector" was created and two new training courses required. These Permit-required training courses are HWO-101, *RCRA Regulations/Hazardous Waste Facility Permit Overview*, and HWP-101, *Permit Inspections and Recordkeeping*, which were added to the appropriate qualification cards and Qualified Watch Lists (QWLs). Facility employees holding the job title of "Inspector" received this new training prior to July 19, 2018. This finding was considered closed by the Permittees upon implementation of the revised Permit training program. The Permittees notified the NMED on September 19, 2018, that the revisions to the Permit training program had been implemented by July 19, 2018. Note that the practice described in the finding of both the FPT and FPE conducting the inspections, with the FPE providing the required certification, was an existing practice prior to the approval of the Class 2 PMR to ensure compliance with the inspection requirements in place at that time.

Finding 4: Failure to Assure that Employees Meet Permit Required Training

"A review of training documentation for randomly selected personnel (consistent with the methodology outlined in Section 4.2) in all job titles applicable to the Review was conducted. Through that process, a variety of potential inconsistencies were identified with the Permit that was current at the time the Review was conducted.

NWP has been developing a new, visually improved system, that allows managers to view the status of personnel training in each job classification. The report is a table that lists employees with columns for each training requirement. The columns are populated with due dates, and are color coded for easy recognition of pending or current issues (e.g., yellow - training due within current month, red – training overdue). Reports have been developed for the most prevalent job classifications. However, the reports do not include "once and done" training requirements, only recurring (refresher) requirements.

The reports described above are developed in support of the training requirements included in the current NWP Qualification Program. That program is not consistent with training requirements in the Permit in all cases. In addition, because reports have not yet been generated for all job titles included in the Permit, training gaps currently go unidentified. As a result of the Review, the following inconsistencies were identified related to training and may potentially result in non-compliances:

- Training modules have been consolidated or expanded and given new titles. No crosswalk for these changes exists, so a new employee taking the new training would not technically meet the requirements of the Permit (examples: OPS-122 is now SBD-101; for RCTs, RAD-201 is now RCT-01-3R; FPT-01 is now FPS-01-01 through 04). However, most personnel currently in job titles with these training requirements have completed the original training.
- Some managers have training gaps relative to Permit requirements (Radiation Control, Environmental Compliance).
- WWIS Data Administrator lacks Subject Matter Expert/OJT training
- Mine Rescue Team one member lacks First Aid/CPR Refresher
- No report has been developed for the Emergency Response Team One member lacks hazardous waste responder training.
- One employee, based on a training status report run on March 13, 2018, had failed to complete the required respirator fit test that was required in February 2018. Further investigation indicated that the test was completed on February 26, 2018, but the record was slow to make it to data entry. While not a non-compliance, this issue created an apparent issue when a report was run.
- FPT training issues, as detailed in depth in Finding 3."

Corrective Action Taken

Some inconsistencies between training documentation and Permit requirements (for the Permit that was in effect at the time of the review) were identified by the Review Team. As noted in the Triennial Review Report, a Class 2 PMR was approved by NMED on March 23, 2018, and resulted in a revised Permit. The revised Permit training program streamlined the facility personnel Permit training program in Permit Attachment F. The revised Permit training program addressed the inconsistencies noted by the Review Team with the previous revision of the Permit. No additional corrective action was necessary; this issue is considered closed.

The Review Team recommended that "once and done" training courses be included in each individual job title report (referred to as the QWL) and that reports be developed for each job title in the Permit. The revised Permit training program eliminated the training requirements for the identified job positions "once and done" training courses. The seven training courses specified in the revised Permit training program have annual refresher training requirements; therefore, no corrective action was required. Additionally, the implementation effort for the revised Permit training program ensured that QWLs had been developed for each functional job title associated with the six job positions outlined in the Permit. This finding was considered closed by the Permittees upon implementation of the revised Permit training program. The Permittees notified the NMED on September 19, 2018, that the revisions to the Permit training program had been implemented by July 19, 2018.

The Review Team also recommended that the Permittees conduct a compliance review of every change to the training program, specifically aimed at identifying changes that may create a technical non-compliance with the Permit. In accordance with the WIPP Training Program, changes to training courses identified in the Permit are required to be screened by the Permittees' Site Environmental Compliance (SEC) organization to ensure continued compliance with the Permit. Additionally, requests for training extensions or equivalencies are required to be reviewed and approved by SEC. Furthermore, qualification documents containing Permit training requirements use a " Δ " designation to identify Permit-required training and the statement; " Δ Required per the HWFP and must be completed within

180 days of the Qualification Card being issued." Implementation of the revised Permit training program addressed the Review Team's concerns; therefore, this issue is considered closed.

The Review Team also identified that it took over two weeks from the time a respirator fit test was completed before the results were uploaded into the training database; however, the process was evaluated, and it was determined that the issue noted by the team was an isolated event rather than a frequent occurrence. The evaluation determined a slow data-entry process that was an infrequent occurrence; therefore, no correction actions were warranted. This issue is considered closed.

Finding 5: DP 831 Fence and Sign Inspections

"DP 831, Conditions 5 & 6 require that the fences and signs surrounding the Facultative Lagoons be inspected. At the time of the on-site portion of the Review, the Operations procedure (WP 04-AD3008) did not include an explicit requirement for fence & sign inspection."

Corrective Action Taken

The corrective action was completed by the Permittees prior to issuance of the Triennial Review Report. Closure of this finding was documented in the Triennial Review Report Recommendation for Finding 5 Recommendation, as shown below:

"The Team discussed this finding with NWP during the onsite Review. As a result, the applicable Round Sheet (EA04AD3008-31-0) administered by Operations has been modified to incorporate the documentation of applicable inspection of the fence and signage. On that basis, this finding is closed."

Observation 1: Need for Additional Assurance that Permitted Waste Volumes in the WHB and PAU are Not Exceeded

"TSCA Permit Section III A 1-2, PCB/TRU Waste Storage, Authorized Storage Areas, defines the maximum quantities of PCB/TRU waste that may be stored in the WHB and PAU at any time. Current practice is to review the CH Waste Operations Tailored Shift Briefing report at the beginning of each shift. That report includes the status of shipments by shipment and TRUPACT identifying location (PAU, WHB, EnRoute) with associated waste volumes.

For the WHB, the current approach limits storage of PCB/TRU waste containers either in the unloading area (limit two TRUPACTs) or on pallets, two loads per pallet. The storage locations of pallets are marked on the floor ensuring that the permitted storage limit cannot be exceeded.

For the PAU, at the beginning of each shift, the amount of waste stored in the PAU is calculated and, if close to the Permitted limit, shipments are held at the gate until waste is moved from the PAU to the WHB, opening up room to receive the shipment(s).

While the system can work, it relies on the experience of the workers to assure that waste isn't received during the shift before space has been created within the Permitted limit. In addition, a desire to remove the artificial limits placed on the WHB in order to improve waste management, was expressed in interviews with NWP. Changing that aspect of WHB operations will increase the complexity of manually calculating waste volumes throughout the shift."

Corrective Action Taken

While this observation of the Review Team is noteworthy, the Permittees are not planning to take any corrective action. An evaluation of field experience with the existing waste-management process indicated that although it is a manual process, it is working well now and has worked well in the past. This experience includes periods where as many as 25 to 35 shipments per week were being received at the WIPP facility. There have been no instances of non-compliance with adhering to the permitted PCB/TRU or PCB/TRU mixed waste-volume limitations. Considering the implications with respect to funding for electronic tablets, software development/quality assurance/maintenance, field tests, and personnel training, the Permittees do not currently believe that there is enough substantial justification to warrant a transition to an automated process. This observation could not lead to environmental regulatory violations. This observation is considered closed.

Observation 2: Formalizing DP 831 Requirements in Procedures or Desk Instructions

"There are several instances where NWP uses the requirements in DP 831 as its procedure for that activity. For example, in Criteria 50, NWP was asked whether there is a procedure/process that outlines the requirements of a contingency plan (once the contingency plan has been enacted). Because there are provisions of DP 831 that aren't explicitly addressed in a procedure, the Review Team is concerned that NWP may be unnecessarily at risk of a non-compliance."

Corrective Action Taken

To ensure that DP-831 contingency plan actions are procedurally addressed, a new procedure, WP 02-RC.17, *DP-831 Contingency Plan*, was developed and issued. In addition, a regulatory crosswalk was developed to verify that NM DP-831 requirements are addressed by site-specific procedures. This observation is considered closed.

3.0 Conclusion

The findings resulting from the first Triennial Review are considered closed by the Permittees. The observations have been evaluated and are also considered closed as described above.

Two of the five findings (Findings 1 and 5) were closed prior to issuance of Triennial Review Report. Closure of these two findings was documented in the Triennial Review Report. The three remaining findings (2-4) are training related. The corrective actions associated with Finding 2 were completed on November 13, 2018, and the corrective actions associated with Findings 3 and 4 were addressed prior to July 19, 2018, upon implementation of the approved Class 2 PMR, *Training Program Revisions*. The corrective actions associated with all five findings were completed prior to November 13, 2018. The first Triennial Review Report was finalized upon submittal to NMED and made publicly available on the WIPP Information Repository on September 19, 2018. Therefore, the corrective actions were completed within 60 days of finalization of the Triennial Review Report in accordance with Paragraph 34 of the SFO.

Attachment Hazardous Waste Facility Permit Position Report

Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name

Employee Name	
1 TRU Mixed Waste Worker	
ACEVEDO, DAVID J.	
ALANZO, ANTHONY	
ALVARADO, ADAN	
ANAYA, MARISSA G.	
ANAYA, RAYMOND	
AYALA, RUDY	
BAILEY, JEROME E.	
BARNES, GERALD BLAINE	
BARTOLOMEY, EDWIN	
BATCHELDER, TERRY A.	
BEALLER, JOSEPH	
BECERRA, RUBEN A.	
BELIS, CHRISTOPHER	
BRENNAN, ROBERT A.	
BROWN, KYLE	
BROWN, WAYNE A.	
BUCHANAN, JOSH R.	
BUENDIA, MIGUEL R.	
CALDER, JUSTIN	
CALDERON, CELIA A.	
CALLISON, BRIAN S.	
CANALES, MARK A.	
CARNATHAN, MATTHEW	
CARRASCO, PHILIP M.	
CEBALLOS, CARLOS A.	
CHAVEZ, JASON O	
CLIFTON, W. WAYNE	
COLE, JASON L.	
COLE, LARRY B.	
COOPER, ANDY L.	
COURSON, TRAVIS D.	
DAVIS, KEVIN R.	
DICAMILLO, TAMMY S.	
DOLEZAL, EDWARD C.	
DOMINGUEZ, ANTHONY	
DOMINGUEZ, HECTOR M.	
DOMINGUEZ, NICO	
DOMINGUEZ, RICHARD M.	
DURAN, ROBERT	
ESTES, TOMMY	
FERNANDEZ, MARGIE	
FLANIGAN, HOWARD E.	
FLOREZ, ERNIE	
Dames 1 of 15 Dames	11/12/2010 7.52.24 ANA

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Employee Name	
FRANCO, BOBBY R.	
FUENTES, RICKY C.	
GREEN, MAX L.	
GROVES, ROGER G.	
HAECK, BRIAN	
HAMEL, PARKER A.	
HERNANDEZ, JASON	
HERNANDEZ, RICHARD T.	
HINOJOS, MICHAEL	
HITCHCOCK, JERRY	
HORN, STEVEN R.	
HUBBARD, BURTON	
HUTCHINS, ARTHUR	
INGRAM, G. WAYNE	
INGRAM, MARCUS L.	
JAMES, MIKE R.	
JASSO, PAT	
JEFFRESS, BRUCE	
JENKINS, SALOMON E.	
KARTCHNER, ROD K.	
KESSLER, GARY L.	
KEYSER, ED R. (RED)	
KIRBY, GARRETT R.	
LEYVA, ZACHARY L.	
LONG SR., MARK L.	
LORD, B. TODD	
LUEBKE, JACOB	
MARQUEZ, ERNEST	
MEEKS, DAVID S.	
MENDOZA, RODOLFO	
MILLER, CHESTER K. (KEVIN)	
MILLER, JOHN (HANK)	
MILLER, JOSHUA M.	
MILLS, CHARLES B. (BRYAN)	
MORRILL, DANELLE L.	
MUNOZ, ADRIAN	
MUNOZ, JOSEPH A.	
MUNOZ, LORENZO	
MURRAY, KENNITH	
NAVARRETTE, HARVEY H.	
NESBIT, CURTIS W.	
NOLTE, JASON	
OLIVO, MATT	
OLSON, TRACY D.	

Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name
PANERAL, PAUL J.
PARRAZ, EDWARD C.
PROCTOR, MIKE G.
RAMSEY, JOHN R.
RAUDA, PATRICK J.
REAVES, COREY D.
RIPLEY, DAVID
RODRIGUEZ, CHRISTOPHER M.
SAIZ, THOMAS J.
SANDERS, DAVID E.
SCOTT, TAYLOR L.
SMITH, BART
SNOW, DAVID J
SODERHOLTZ, KARL B.
STANFORD, AMY H.
STEGMAN, MICAELA M.
STEWART, STEPHEN J.
STROBLE, RUSSELL C.
TANNER, K. MIKE
TAVAREZ, RAMON M.
THOE, DAVID
TURNBOW, LANCE
UTTER, AUDRYANNA C.
VILLEGAS, DANIEL R.
WALTON, GERALDINE
WARD, A. KEVIN
WHEELER, JAMES B.
WILBANKS, SCOTT A.
WILLIAMS, CANDICE M.
WILLIAMS, SKYLAR P.
ZAHENSKY, F. RICK

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Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name

2 TRU Mixed Waste Worker Supervisor
BATCHELDER, TERRY A.
BRENNAN, ROBERT A.
CALLISON, BRIAN S.
CARNATHAN, MATTHEW
DICAMILLO, TAMMY S.
GROVES, ROGER G.
INGRAM, MARCUS L.
JASSO, PAT
JEFFRESS, BRUCE
KEYSER, ED R. (RED)
MILLER, JOHN (HANK)
RIPLEY, DAVID
SANDERS, DAVID E.
SNOW, DAVID J
WARD, A. KEVIN

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Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name

3 Emergency Coordinator	
BAILEY, JUSTIN W.	
BEALLER, JOSEPH	
BELIS, CHRISTOPHER	
BROWN, GREG W.	
COOPER, ANDY L.	
COOPER, J. RICK	
DORADO, JOHN E.	
FOSTER, JERRY D.	
FRANCO, BOBBY R.	
KESSLER, GARY L.	
KESTERSON, MICHELLE	
LONG SR., MARK L.	
MARTINEZ, JORGE R.	
McCOLLAUM, J.D.	
MCGILVRAY, DESTERY L.	
ORR, PAUL D.	
PANERAL, PAUL J.	
PIERCE, DOUG	
PROCTOR, MIKE G.	
STROBLE, RUSSELL C.	
TIFFNER, ROGER L.	
WHEELER, JAMES B.	

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Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name

	Employee Name
4	Emergency Responder
	AGUILAR, I. (JEROME)
	ALAM, MARK J.
	ALANZO, ANTHONY
	ANAYA, MARISSA G.
	ANAYA, RAYMOND
	ANDREWS, CRAIG L.
	AYALA, RUDY
	BAILEY, JEROME E.
	BARNES, GERALD BLAINE
	BARTOLOMEY, EDWIN
	BATCHELDER, TERRY A.
	BEALLER, JOSEPH
	BECERRA, RUBEN A.
	BELIS, CHRISTOPHER
	BRENNAN, ROBERT A.
	BUENDIA, MIGUEL R.
	CALDER, JUSTIN
	CANALES, MARK A.
	CARRASCO, AUGUSTINE
	CARRASCO, PHILIP M.
	CASTILLO, ALBERT R.
	CEBALLOS, CARLOS A.
	CEDILLOS, DANIEL J.
	CHAVEZ, JASON O
	COLE, JASON L.
	COOPER, ANDY L.
	COURSON, TRAVIS D.
	DAVIS, KEVIN R.
	DICAMILLO, TAMMY S.
	DOLEZAL, EDWARD C.
	DOMINGUEZ, NICO
	DOMINGUEZ, RICHARD M.
	EASLEY, DARREN E.
	ELLIOTT, BLAKE A.
	EVANS, STEPHEN M.
	FERNANDEZ, MARGIE
	FLOREZ, ALFREDO R.
	FRANCO, BOBBY R.
	FUENTES, RICKY C.
	GARCIA, ALFREDO R.
	GARCIA, ANTONIO H.
	GREEN, MAX L.
	GRIGG, BRANDON J.

Employee Name
HAMEL, PARKER A.
HERNANDEZ, JASON
HIGGINS, DUSTIN
HITCHCOCK, JERRY
HORN, STEVEN R.
HUBBARD, BURTON
HUTCHINS, ARTHUR
INGRAM, MARCUS L.
JASSO, PAT
JENKINS, SALOMON E.
JOHNSON, EMORY J.
KESSLER, GARY L.
KIRBY, GARRETT R.
KIRSNER, STEVE B.
LEWIS, KEITH
LONG SR., MARK L.
LORD, B. TODD
MADRID, AJAY M.
MARQUEZ, ERNEST
MARQUEZ, MANUEL
MEEKS, DAVID S.
MESSER, LUCAS S.
MILLER, CHESTER K. (KEVIN)
MILLER, JOSHUA M.
MILLS, CHARLES B. (BRYAN)
MORRILL, DANELLE L.
MUNOZ, JOSEPH A.
NESBIT, CURTIS W.
NOLTE, JASON
OLIVO, MATT
OLSON, TRACY D.
PADILLA, MATHEW J.
PANERAL, PAUL J.
PERRONE, NICHOLAS
PROCTOR, MIKE G.
RAMSEY, JOHN R.
RAUDA, PATRICK J.
REAVES, COREY D.
ROBINSON, ERIC P.
RODRIGUEZ, CHRISTOPHER M.
SCOTT, TAYLOR L.
SNOW, DAVID J
SODERHOLTZ, KARL B.
STANFORD, AMY H.

Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name
STEGMAN, MICAELA M.
STEWART, STEPHEN J.
STROBLE, RUSSELL C.
TANNER, K. MIKE
TAVAREZ, RAMON M.
THOE, DAVID
THOMPSON, STEPHEN P. (PAUL)
TURNBOW, LANCE
UTTER, AUDRYANNA C.
VILLEGAS, DANIEL R.
WALTON, GERALDINE
WARD, A. KEVIN
WILLARD, KEVIN A.
WILLIAMS, CANDICE M.
ZAHENSKY, F. RICK

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Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name

Employee Name	
5 Inspector	
ACEVEDO, DAVID J.	
AGEE, JEREMY J.	
AGUILAR, I. (JEROME)	
ALAM, MARK J.	
ALANZO, ANTHONY	
ALMANZA, FIDEL M.	
ALVARADO, ADAN	
ALVAREZ, RAUL L.	
ANAYA, AUGINA M.	
ANDREWS, CRAIG L.	
ARMENDAREZ, JESUS NMN	
ARMIENTA, SYANN	
AUTRY, MONTE	
BAILEY, JAMES	
BAILEY, JUSTIN W.	
BARNES, GERALD BLAINE	
BARREDA, JOHN	
BATCHELDER, TERRY A.	
BEALLER, JOSEPH	
BECERRA, JESUS U.	
BELIS, CHRISTOPHER	
BICKERSTAFF, KRIS A.	
BIRCHELL, JERRY LEE	
BIRD, MICHAEL D.	
BRANAMAN, DORA	
BRENNAN, ROBERT A.	
BROCKMAN, AMBER M.	
BROWN, ANTHONY	
BROWN, GREG W.	
BROWN, KYLE	
BROWN, WAYNE A.	
BRYANT, LARRY L.	
BUCHANAN, JOSH R.	
BUENDIA, MIGUEL R.	
CALDERON, CELIA A.	
CALDERON, DANIEL A.	
CALLEROS, JULISSA	
CALLISON, BRIAN S.	
CANADA, W. TRACY	
CARRASCO, AUGUSTINE	
CARRASCO, CHRISTOPHER	
CARRASCO, JASON L.	
CARRASCO, JOE M.	
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Employee Name
CARRASCO, PHILIP M.
CARRASCO, REY C.
CASEY, JEFFREY B.
CASTILLO ALBERT R
CASTILLO, ALBERT R.
CASTRO, RUBEN
CEBALLOS, CARLOS A.
CEDILLOS, DANIEL J.
CHAVEZ JR., R. ERIC
CISNEROS, RICHARD A.
CLIFTON, W. WAYNE
COHEN, FRANCINE
COLE, LARRY B.
COOPER, ANDY L.
COOPER, J. RICK
COTTINGHAM, BRANT
DAVIS II, RICHARD H.
DAVIS, PAUL J.
DAWE, SAMUEL C.
DEARING, ROY
DEARING, TRACY
DELGADO, JOSE RUIZ
DICAMILLO, TAMMY S.
DOMINGUEZ, ANTHONY
DOMINGUEZ, CHRISTOPHER
DOMINGUEZ, HECTOR M.
DOMINGUEZ, JULIAN D.
DOMINGUEZ, NICO
DOMINGUEZ, RICHARD M.
DOPORTO, RONNIE
DORADO, JOHN E.
DORADO, PATRICK
DOSSEY, DAVID
DOUBERLY, EDWARD B.
DUARTE, ISMAEL L.
DUFTY, LYNDON
DURAN, ROBERT
EASLEY, DARREN E.
ELLIOTT, BLAKE A.
ESTES, TOMMY
ESTRADA, ALBERT
EVANS, STEPHEN M.
EVERHART, STACEY
FLANIGAN, HOWARD E.

Employee Name
FLOREZ, ALFREDO R.
FLOREZ, ERNIE
FOSTER, JERRY D.
·
FRANCO, BOBBY R.
FRANCO, DAVID
FRANCO, FRANK Y.
FRANCO, ORLANDO
FRY, MICHAEL J.
FUENTES, JONATHAN
FUENTES, RICKY C.
GALINDO, JACOB
GARCIA, ALFREDO R.
GARCIA, ANTONIO H.
GARRIOTT, ORIN
GOMEZ, EZEQUIEL
GONZALEZ, JONATHAN E.
GRACEY, HAZEL BRAND
GRANGER, CHARLES
GREEN, MAX L.
GREENFIELD, JESSE L.
GRIGG, BRANDON J.
GUMM, BRIAN G.
GUTIERREZ, MARCOS
HAECK, BRIAN
HEINE, BERRY F.
HERAS, BRYAN B.
HERNANDEZ, ALFONSO G.
HERNANDEZ, CHRIS C.
HERNANDEZ, EDDIE J.
HERNANDEZ, JASON
HERNANDEZ, RICHARD T.
HIGGINS, DUSTIN
HIGGINS, SCOTT
HINOJOS, MICHAEL
HITCHCOCK, JERRY
HOLLEN, JIM R.
HUTCHINS, ARTHUR
INGRAM, G. WAYNE
INGRAM, MARCUS L.
JACO, WILLIAM (BILL)
JAMES, MIKE R.
JANWAY, SCOTT
JASSO, PAT
JEFFRESS, BRUCE

Employee Name	
JOHNSON, EMORY J.	
JONES, CHRIS T	
JUAREZ, CHRISTINE J.	
JURNEY, DONALD	
KARTCHNER, ROD K.	_
KESSLER, GARY L.	
KESTERSON, MICHELLE	
KEYSER, ED R. (RED)	
KIRBY, GARRETT R.	
KIRSNER, STEVE B.	
LARSEN, BRENDA	
LEWIS, KEITH	
LEWIS, R. ED	
LEYVA, ZACHARY L.	_
LONG JR., MARK L.	
LONG SR., MARK L.	
LONG, MISTY	
LOPEZ, RAY M.	
LORD, B. TODD	
LUCAS, ROBERT J.	
LUEBKE, JACOB	
LUJAN, ADRIAN D.	
MADRID, AJAY M.	
MADRID, RICK (ENRIQUE)	
MARQUEZ, ERNEST	
MARQUEZ, MANUEL	
MARTINEZ, BOBBY R.	
MARTINEZ, FRANK	
MARTINEZ, JORGE R.	
MCCARTY, WESLEY L.	
McCOLLAUM, J.D.	
MCGILVRAY, DESTERY L.	
MEDINA, BEN J.	
MEEKS, DAVID S.	
MENDOZA, RODOLFO	
MESSER, LUCAS S.	
METHOLA, FRANK	
MIDDLETON, DANIEL W.	
MIHELIC, G. (TONY)	
MILLER, JOHN (HANK)	
MILLER, JOSHUA M.	_
MOFFATT, TAMRA A.	_
MOLGAARD, P. BRAD	_
MONTANEZ, JERRY	_
	_

Employee Name
MORENO, JESSIE
MUNOZ, ADRIAN
MUNOZ, DICK
MUNOZ, GABRIEL P.
MUNOZ, LORENZO
MURRAY, KENNITH
NAVARRETTE, HARVEY H.
NEWMAN, CAROLYN E.
OLIVERI, MICHAEL J.
OLIVO, MATT
OLIVO, RUDY R.
ONSUREZ, DOMINICK
ORR, PAUL D.
ORTEGA, JEFFERY J.
PADILLA, MATHEW J.
PANERAL, PAUL J.
PARRAZ, EDWARD C.
PARRISH, RYAN
PEARCE, JAMES
PERRONE, NICHOLAS
PHILLIPS, MICHAEL R.
PIERCE, DOUG
PISTOLE, ALAN
PORRAS, SAMUEL R.
PROCTOR, MIKE G.
QUEEN, FORREST E.
QUINONEZ, JAIME Y.
QUINTANA, PATRICK C.
RAMIREZ, JOHN R.
RAMSEY, JOHN R.
RASCON, TOMMY
RAYOS, JESSIE J.
REINER, SCOTT A.
RHINEHART, DAVID
RIDGWAY, COLTON A.
RIDGWAY, MATHEW
RIPLEY, DAVID
ROBINSON, ERIC P.
RODRIGUEZ, CHRISTOPHER M.
RODRIGUEZ, DANIEL
RODRIGUEZ, ISAI A.
SAIZ, THOMAS J.
SALIFU, HARUNA
SALTZMAN, ERIC

Employee Name
SCOTT, TAYLOR L.
SIEPEL, NORM D.
SILVEIRA, JEFFREY D.
SMITH, BART
SNOW, DAVID J
SOTO, STEVE R.
SPAIN, RYAN
SPIVEY, MAURICE M.
STROBLE, RUSSELL C.
SUPKA, RICK C.
TAVAREZ, RAMON M.
THOMPSON, STEPHEN P. (PAUL)
TIFFNER, ROGER L.
TURNBOW, LANCE
TWEEDY, DEREK
UNDERWOOD, JOSEPH B. (J.B.)
VALENZUELA, ADAM D.
VICKREY, DALE J.
VILLEGAS, DANIEL R.
WALTON, GERALDINE
WARD, A. KEVIN
WEST, RICHARD G.
WHEELER, JAMES B.
WHITE, COLIN L.
WHITE, DENNIS (TATE)
WHITE, DENNIS L.
WILBANKS, SCOTT A.
WILLARD, KEVIN A.
WILLIAMS, SKYLAR P.
WILSON, RANDY B.
WORKMAN, DUSTIN
YANDELL, JUSTIN B.
YBARRA, ROBERT V.
YOCOM, BENJAMIN
ZIMMERLY, BEN (TY) F.

Hazardous Waste Facility Permit (HWFP) Position Report

Employee Name

6 RCRA Training	Director
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GALLAGHER, STEVE

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