

ATTACHMENT A
GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION

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TABLE OF CONTENTS

A-1	Facility Description	1
A-2	Description of Activities	2
A-3	Property Description	2
A-4	Facility Type	2
A-5	Waste Description	3
A-6	Chronology of Events Relevant to Changes in Ownership or Operational Control	4

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1 A-2 Description of Activities

2 The Waste Isolation Pilot Plant (**WIPP**) is a facility for the management, storage, and disposal of
3 transuranic (**TRU**) mixed waste subject to regulation under 20.4.1.500 NMAC. Both contact-
4 handled (**CH**) and remote-handled (**RH**) TRU mixed wastes are permitted for storage and
5 disposal at the WIPP facility.

6 A-3 Property Description

7 The WIPP property has been divided into functional areas. The Property Protection Area (**PPA**),
8 surrounded by a chain-link security fence, encompasses 34.16 acres and provides security and
9 protection for all major surface structures. The DOE Off Limits Area encloses the PPA, and is
10 approximately 1,454 acres. These areas define the DOE exclusion zone within which certain
11 items and material are prohibited. The final zone is marked by the WIPP Site Boundary (WIPP
12 Land Withdrawal Area), a 16-section Federal land area under the jurisdiction of the DOE.

13 A-4 Facility Type

14 There are three basic groups of structures associated with the WIPP facility: surface structures,
15 shafts and underground structures. The surface structures accommodate the personnel,
16 equipment, and support services required for the receipt, preparation, and transfer of TRU
17 mixed waste from the surface to the underground. There are two surface locations where TRU
18 mixed waste is managed and stored. The first area is the Waste Handling Building (**WHB**)
19 Container Storage Unit (**WHB Unit**) for TRU mixed waste management and storage. The WHB
20 Unit consists of the WHB contact-handled (**CH**) Bay and the remote-handled (**RH**) Complex.
21 The second area designated for managing and storing TRU mixed waste is the Parking Area
22 Container Storage Unit (**Parking Area Unit**), an outside container storage area which extends
23 south from the WHB to the rail siding. The Parking Area Unit provides storage space for up to
24 50 loaded Contact-Handled Packages and 14 loaded Remote-Handled Packages on an asphalt
25 and concrete surface. Part 3 of the permit authorizes the storage and management of CH and
26 RH TRU mixed waste containers in these two surface locations. The technical requirements of
27 20.4.1.500 NMAC (incorporating 40 CFR §§264.170 to 264.178) are applied to the operation of
28 the WHB Unit and the Parking Area Unit. Permit Attachment A1 describes the container storage
29 units, the TRU mixed waste management facilities and operations, and compliance with the
30 technical requirements of 20.4.1.500 NMAC.

31 Four vertical shafts connect the surface facility to the underground. These are the Waste Shaft,
32 the Salt Handling Shaft, the Exhaust Shaft and the Air Intake Shaft. The Waste Shaft is the only
33 shaft used to transport TRU mixed waste to the underground. The WIPP underground
34 structures are located in a mined salt bed 2,150 feet below the surface.

35 The WIPP is a geologic repository mined within a bedded salt formation, which is defined in
36 20.4.1.100 NMAC (incorporating 40 CFR §260.10) as a miscellaneous unit. As such, hazardous
37 waste management units within the repository are subject to permitting according to 20.4.1.900
38 and .901 NMAC (incorporating 40 CFR §270), and are regulated under 20.4.1.500 NMAC,
39 Miscellaneous Units.

40 The underground structures include the underground Hazardous Waste Disposal Units
41 (**HWDUs**), an area for future underground HWDUs, the shaft pillar area, interconnecting drifts
42 and other areas unrelated to the Hazardous Waste Facility Permit. The underground HWDUs

1 are defined as waste panels, each consisting of seven rooms and two access drifts. The WIPP
2 underground area is designated as Panels 1 through ~~10A10~~, although only Panels 1 through 8
3 will be used under the terms of this permit. Each of the seven rooms is approximately 300 feet
4 long, 33 feet wide and 13 feet high. Part 4 of the permit authorizes the management and
5 disposal of CH and RH TRU mixed waste containers in underground HWDUs. The Disposal
6 Phase consists of receiving CH and RH TRU mixed waste shipping containers, unloading and
7 transporting the waste containers to the underground HWDUs, emplacing the waste in the
8 underground HWDUs, and subsequently achieving closure of the underground HWDUs in
9 compliance with applicable State and Federal regulations. As required by 20.4.1.500 NMAC
10 (incorporating 40 CFR §264.601), the Permittees shall ensure that the environmental
11 performance standards for a miscellaneous unit, which are applied to the underground HWDUs
12 in the geologic repository, will be met. Permit Attachment A2 describes the underground
13 HWDUs, the TRU mixed waste management facilities and operations, and compliance with the
14 technical requirements of 20.4.1.500 NMAC.

15 A-5 Waste Description

16 Wastes destined for WIPP are byproducts of nuclear weapons production and have been
17 identified in terms of waste streams based on the processes that produced them. Each waste
18 stream identified by generators is assigned to a Waste Summary Category to facilitate RCRA
19 waste characterization, and reflect the final waste forms acceptable for WIPP disposal.

20 These Waste Summary Categories are:

21 S3000—Homogeneous Solids

22 Solid process residues defined as solid materials, excluding soil, that do not meet the
23 applicable regulatory criteria for classification as debris [20.4.1.800 NMAC, (incorporating
24 40 CFR §268.2(g) and (h))]. Solid process residues include inorganic process residues,
25 inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are
26 included in this Waste Summary Category based on the specific waste stream types and
27 final waste form. This category includes wastes that are at least 50 percent by volume
28 solid process residues.

29 S4000—Soils/Gravel

30 This waste summary category includes waste streams that are at least 50 percent by
31 volume soil. Soils are further categorized by the amount of debris included in the matrix.

32 S5000—Debris Wastes

33 This waste summary category includes waste that is at least 50 percent by volume
34 materials that meet the NMAC criteria for classification as debris (20.4.1.800 NMAC
35 (incorporating 40 CFR §268.2)). Debris means solid material exceeding a 2.36 inch (60
36 millimeter) particle size that is intended for disposal and that is: 1) a manufactured object,
37 2) plant or animal matter, or 3) natural geologic material.

38 The S5000 Waste Summary Category includes metal debris, metal debris containing lead,
39 inorganic nonmetal debris, asbestos debris, combustible debris, graphite debris,
40 heterogeneous debris, and composite filters, as well as other minor waste streams.
41 Particles smaller than 2.36 inches in size may be considered debris if the debris is a
42 manufactured object and if it is not a particle of S3000 or S4000 material.

1 If a waste does not include at least 50 percent of any given category by volume,
2 characterization shall be performed using the waste characterization process required for the
3 category constituting the greatest volume of waste for that waste stream.

4 Wastes may be generated at the WIPP facility as a direct result of managing the TRU and TRU
5 mixed wastes received from the off-site generators. Such waste may be generated in either the
6 WHB or the underground. This waste is referred to as "derived waste." All such derived waste
7 will be placed in the rooms in HWDUs along with the TRU mixed waste for disposal.

8 Non-mixed hazardous wastes generated at the WIPP, through activities where contact with TRU
9 mixed waste does not occur, are characterized, placed in containers, and stored (for periods not
10 exceeding the limits specified in 20.4.1.300 NMAC (incorporating 40 CFR §262.34)) until they
11 are transported off site for treatment and/or disposal at a permitted facility. This waste
12 generation and accumulation activity, when performed in compliance with 20.4.1.300 NMAC
13 (incorporating 40 CFR §262), is not subject to RCRA permitting requirements and, as such, is
14 not addressed in the permit.

15 A-6 Chronology of Events Relevant to Changes in Ownership or Operational Control

16 December 19, 1997 NMED received notification of a change of name/ownership from
17 Westinghouse Electric Corporation to CBS Corporation. The WIPP
18 Management and Operating Contractor (**MOC**), Westinghouse Waste
19 Isolation Division (**WID**), became a division of Westinghouse Electric
20 Company, which in turn was a division of CBS Corporation. Notification to
21 NMED was made by the permit applicant in a letter dated December 18,
22 1997. The permit application was under review, but a draft permit was not
23 yet issued.

24 September 22, 1998 NMED received notification of a pending transfer of ownership for the
25 MOC, Westinghouse WID, from CBS Corporation to an as-yet-to-be-
26 named limited liability company owned jointly by British Nuclear Fuels, plc
27 and Morrison-Knudsen Corporation. The transfer of ownership was
28 scheduled to occur on or about December 15, 1998. Notification to NMED
29 was made by the permit applicant in a letter dated September 17, 1998.
30 The draft permit had been issued for public comment, but the final permit
31 was not yet issued.

32 March 9, 1999 NMED again received notification of the pending divestiture of the MOC,
33 Westinghouse WID, by CBS Corporation to the limited liability company
34 owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen
35 Corporation known as MK/BNFL GESCO LLC. The new MOC would be
36 renamed to Westinghouse Government Environmental Services
37 Company LLC. Notification to NMED was made by the permit applicant in
38 a letter dated March 2, 1999. The public hearing on the permit was
39 underway, but the final permit was not yet issued.

40 March 26, 1999 NMED received official notification of the divestiture of Westinghouse
41 Electric Company by CBS Corporation to MK/BNFL GESCO LLC
42 effective March 22, 1999. The MOC was renamed Westinghouse
43 Government Environmental Services Company LLC (**WGES**), of which

1 Westinghouse Waste Isolation Division was a division. This transaction
2 constituted a change of operational control under 20.4.1.900 NMAC
3 (incorporating 40 CFR §270.40). Notification to NMED was made by the
4 permit applicant in a letter dated March 24, 1999. The public hearing on
5 the permit was nearly concluded, but the final permit was not yet issued.

6 April 28, 1999 NMED received a revised Part A Permit Application in a letter dated April
7 21, 1999, reflecting that the Westinghouse Waste Isolation Division, co-
8 operator of the WIPP hazardous waste facility, was now a part of WGES.
9 However, the final permit, issued October 27, 1999, did not reflect the
10 change in ownership.

11 July 25, 2000 NMED received a Class 1 permit modification in a letter dated July 21,
12 2000, changing the name in the Permit from Westinghouse Electric
13 Corporation to Westinghouse Government Environmental Services
14 Company LLC (**WGES**), Waste Isolation Division (**WID**). However, this
15 notification did not constitute the required permit modification under
16 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect
17 the transfer of the permit to a new operator.

18 December 15, 2000 DOE announced that it had awarded a five-year contract for management
19 and operation of WIPP to Westinghouse TRU Solutions LLC, a limited
20 liability company owned jointly by WGES LLC and Roy F. Weston, Inc.
21 The announcement further stated that, following a brief transition period,
22 the new contractor would assume MOC responsibilities on February 1,
23 2001. This transaction constituted a change of operational control under
24 20.4.1.900 NMAC (incorporating 40 CFR §270.40) requiring a Class 1
25 permit modification with prior written approval of NMED.

26 February 5, 2001 NMED received a Class 1 permit modification in a letter dated February 2,
27 2001, which notified NMED of an organizational name change of the
28 MOC from Westinghouse Government Environmental Services Company
29 LLC Waste Isolation Division to Westinghouse TRU Solutions LLC.
30 However, this notification did not constitute the required permit
31 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)
32 necessary to reflect the transfer of the permit to a new operator.

33 December 31, 2002 NMED received a Class 1 permit modification in a letter dated December
34 27, 2002, which changed the name of the MOC from Westinghouse TRU
35 Solutions LLC to Washington TRU Solutions LLC. Again, this notification
36 did not constitute the required permit modification under 20.4.1.900
37 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of
38 the permit to a new operator.

39 February 28, 2003 NMED received a Class 1 permit modification requiring prior agency
40 approval in a letter dated February 28, 2003, to satisfy the requirements
41 specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.40) to reflect
42 the transfer of the permit to a new operator.

- 1 September 16, 2004 NMED received a Class 1 permit modification requiring prior agency
2 approval in a letter dated September 16, 2004, describing a change of
3 ownership of Washington TRU Solutions LLC (**WTS**). WTS is owned
4 jointly by WGES, managing member, and Weston Solutions, Inc. WGES
5 had been owned jointly by Washington Group International, Inc. (**WGI**),
6 and BNFL Nuclear Services, Inc. However, WGI has acquired BNFL's
7 prior interest in the former Westinghouse government services
8 businesses, which includes BNFL's prior interest in WGES.
- 9 August 6, 2007 NMED received notification in a letter dated August 2, 2007 of the
10 pending acquisition of WGI by URS Corporation at an unknown future
11 date. This acquisition would be related to operational control, because
12 WGI is the sole owner of WGES, managing member of the joint venture,
13 along with Weston Solutions, Inc., that owns WTS, the WIPP MOC. This
14 notification was submitted to assure compliance with 20.4.1.900 NMAC
15 (incorporating 40 CFR §270.40(b)).
- 16 November 26, 2007 NMED received a Class 1 permit modification requiring prior agency
17 approval in a letter dated November 19, 2007, describing a change of
18 ownership of WTS. On November 15, 2007, WGI was acquired by URS
19 Corporation. WTS is owned jointly by WGES, managing member, and
20 Weston Solutions, Inc. WGES, formerly owned by WGI, is now owned by
21 URS Corporation.
- 22 October 1, 2012 NMED received a Class 1 permit modification requiring prior agency
23 approval in a letter dated June 25, 2012 describing a change in the MOC
24 for the WIPP facility. The new MOC for the WIPP facility will be Nuclear
25 Waste Partnership LLC. The new MOC is comprised of URS Energy and
26 Construction, Inc. and Babcock and Wilcox Technical Services Group,
27 Inc.