

**ATTACHMENT A**  
**GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION**

Waste Isolation Pilot Plant  
Hazardous Waste Permit  
April 1, 2010

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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. Both contact-handled (**CH**) and remote-handled (**RH**) TRU  
4 mixed wastes are permitted for storage or disposal at the WIPP facility.

5 A-3 Property Description

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

12 A-4 Facility Type

13 There are three basic groups of structures associated with the WIPP facility: surface structures,  
14 shafts and underground structures. The surface structures accommodate the personnel,  
15 equipment, and support services required for the receipt, preparation, and transfer of TRU  
16 mixed waste from the surface to the underground. There are two surface locations where TRU  
17 mixed waste will be managed and stored. The first area is the Waste Handling Building (**WHB**)  
18 Container Storage Unit (WHB Unit) for TRU mixed waste management and storage. The WHB  
19 Unit consists of the WHB contact-handled (**CH**) Bay and the remote-handled (**RH**) Complex.  
20 The second area designated for managing and storing TRU mixed waste is the Parking Area  
21 Container Storage Unit (Parking Area Unit), an outside container storage area which extends  
22 south from the WHB to the rail siding. The Parking Area Unit provides storage space for up to  
23 50 loaded Contact-Handled Packages and 14 loaded Remote-Handled Packages on an asphalt  
24 and concrete surface.

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

29 The underground structures include the underground Hazardous Waste Disposal Units  
30 (**HWDUs**), an area for future underground HWDUs, the shaft pillar area, interconnecting drifts  
31 and other areas unrelated to the RCRA Hazardous Waste Permit. The underground HWDUs  
32 are defined as waste panels, each consisting of seven rooms and two access drifts. The WIPP  
33 underground area is designated as Panels 1 through 10, although only Panels 1 through 7 will  
34 be used under the terms of this permit. Each of the seven rooms is approximately 300 feet long,  
35 33 feet wide and 13 feet high.

36 A-5 Waste Description

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

1 These Waste Summary Categories are:

2 S3000—Homogeneous Solids

3 Solid process residues defined as solid materials, excluding soil, that do not meet the  
4 applicable regulatory criteria for classification as debris [20.4.1.800 NMAC, (incorporating  
5 40 CFR §268.2(g) and (h))]. Solid process residues include inorganic process residues,  
6 inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are  
7 included in this Waste Summary Category based on the specific waste stream types and  
8 final waste form. This category includes wastes that are at least 50 percent by volume  
9 solid process residues.

10 S4000—Soils/Gravel

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

13 S5000—Debris Wastes

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

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

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

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

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

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

- 2 December 19, 1997 NMED received notification of a change of name/ownership from  
3 Westinghouse Electric Corporation to CBS Corporation. The WIPP  
4 Management and Operating Contractor (**MOC**), Westinghouse Waste  
5 Isolation Division (**WID**), became a division of Westinghouse Electric  
6 Company, which in turn was a division of CBS Corporation. Notification to  
7 NMED was made by the permit applicant in a letter dated December 18,  
8 1997. The permit application was under review, but a draft permit was not  
9 yet issued.
- 10 September 22, 1998 NMED received notification of a pending transfer of ownership for the  
11 MOC, Westinghouse WID, from CBS Corporation to an as-yet-to-be-  
12 named limited liability company owned jointly by British Nuclear Fuels, plc  
13 and Morrison-Knudsen Corporation. The transfer of ownership was  
14 scheduled to occur on or about December 15, 1998. Notification to NMED  
15 was made by the permit applicant in a letter dated September 17, 1998.  
16 The draft permit had been issued for public comment, but the final permit  
17 was not yet issued.
- 18 March 9, 1999 NMED again received notification of the pending divestiture of the MOC,  
19 Westinghouse WID, by CBS Corporation to the limited liability company  
20 owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen  
21 Corporation known as MK/BNFL GESCO LLC. The new MOC would be  
22 renamed to Westinghouse Government Environmental Services  
23 Company LLC. Notification to NMED was made by the permit applicant in  
24 a letter dated March 2, 1999. The public hearing on the permit was  
25 underway, but the final permit was not yet issued.
- 26 March 26, 1999 NMED received official notification of the divestiture of Westinghouse  
27 Electric Company by CBS Corporation to MK/BNFL GESCO LLC  
28 effective March 22, 1999. The MOC was renamed Westinghouse  
29 Government Environmental Services Company LLC (**WGES**), of which  
30 Westinghouse Waste Isolation Division was a division. This transaction  
31 constituted a change of operational control under 20.4.1.900 NMAC  
32 (incorporating 40 CFR §270.40). Notification to NMED was made by the  
33 permit applicant in a letter dated March 24, 1999. The public hearing on  
34 the permit was nearly concluded, but the final permit was not yet issued.
- 35 April 28, 1999 NMED received a revised Part A Permit Application in a letter dated April  
36 21, 1999, reflecting that the Westinghouse Waste Isolation Division, co-  
37 operator of the WIPP hazardous waste facility, was now a part of WGES.  
38 However, the final permit, issued October 27, 1999, did not reflect the  
39 change in ownership.
- 40 July 25, 2000 NMED received a Class 1 permit modification in a letter dated July 21,  
41 2000, changing the name in the Permit from Westinghouse Electric  
42 Corporation to Westinghouse Government Environmental Services  
43 Company LLC (**WGES**), Waste Isolation Division (**WID**). However, this  
44 notification did not constitute the required permit modification under

1 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect  
2 the transfer of the permit to a new operator.

3 December 15, 2000 DOE announced that it had awarded a five-year contract for management  
4 and operation of WIPP to Westinghouse TRU Solutions LLC, a limited  
5 liability company owned jointly by WGES LLC and Roy F. Weston, Inc.  
6 The announcement further stated that, following a brief transition period,  
7 the new contractor would assume MOC responsibilities on February 1,  
8 2001. This transaction constituted a change of operational control under  
9 20.4.1.900 NMAC (incorporating 40 CFR §270.40) requiring a Class 1  
10 permit modification with prior written approval of NMED.

11 February 5, 2001 NMED received a Class 1 permit modification in a letter dated February 2,  
12 2001, which notified NMED of an organizational name change of the  
13 MOC from Westinghouse Government Environmental Services Company  
14 LLC Waste Isolation Division to Westinghouse TRU Solutions LLC.  
15 However, this notification did not constitute the required permit  
16 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)  
17 necessary to reflect the transfer of the permit to a new operator.

18 December 31, 2002 NMED received a Class 1 permit modification in a letter dated December  
19 27, 2002, which changed the name of the MOC from Westinghouse TRU  
20 Solutions LLC to Washington TRU Solutions LLC. Again, this notification  
21 did not constitute the required permit modification under 20.4.1.900  
22 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of  
23 the permit to a new operator.

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

28 September 16, 2004 NMED received a Class 1 permit modification requiring prior agency  
29 approval in a letter dated September 16, 2004, describing a change of  
30 ownership of Washington TRU Solutions LLC (**WTS**). WTS is owned  
31 jointly by WGES, managing member, and Weston Solutions, Inc. WGES  
32 had been owned jointly by Washington Group International, Inc. (**WGI**),  
33 and BNFL Nuclear Services, Inc. However, WGI has acquired BNFL's  
34 prior interest in the former Westinghouse government services  
35 businesses, which includes BNFL's prior interest in WGES.

36 August 6, 2007 NMED received notification in a letter dated August 2, 2007 of the  
37 pending acquisition of WGI by URS Corporation at an unknown future  
38 date. This acquisition would be related to operational control, because  
39 WGI is the sole owner of WGES, managing member of the joint venture,  
40 along with Weston Solutions, Inc., that owns WTS, the WIPP MOC. This  
41 notification was submitted to assure compliance with 20.4.1.900 NMAC  
42 (incorporating 40 CFR §270.40(b)).

1 November 26, 2007 NMED received a Class 1 permit modification requiring prior agency  
2 approval in a letter dated November 19, 2007, describing a change of  
3 ownership of WTS. On November 15, 2007, WGI was acquired by URS  
4 Corporation. WTS is owned jointly by WGES, managing member, and  
5 Weston Solutions, Inc. WGES, formerly owned by WGI, is now owned by  
6 URS Corporation