

Class 1 Permit Modification

**Update the WIPP Home Page Address and Change the Department of Energy
Manager**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

WIPP HWFP #NM4890139088-TSDF

December 2005

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Acronyms and Abbreviations

CBFO	Carlsbad Field Office
CFR	Code of Federal Regulations
DOE	Department of Energy
HWFP	Hazardous Waste Facility Permit
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
PMN	Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
TSDf	Treatment, Storage and Disposal Facility
WIPP	Waste Isolation Pilot Plant
WTS	Washington TRU Solutions LLC

Overview of the Permit Modification Notification

This document contains Class 1 Permit Modification Notifications (**PMN**) to the Hazardous Waste Facility Permit (**HWFP**) at the Waste Isolation Pilot Plant (**WIPP**), Permit Number NM4890139088-TSDF hereinafter referred to as the WIPP HWFP.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**), Carlsbad Field Office (**CBFO**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with the WIPP HWFP, Condition I.B.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (40 **CFR**) §270.42(a)). The PMN in this document is necessary to notify the New Mexico Environment Department (**NMED**) of the following changes:

- update to the WIPP informational web page address,
- and change the DOE, CBFO Manager.

These changes do not reduce the ability of the Permittees to protect human health and the environment.

The requested modifications to the WIPP HWFP and related supporting documents are provided in this PMN. The proposed modifications to the text of the WIPP HWFP have been identified using a double underline and revision bar in the right hand margin for added information, and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text.

Attachment A

Description of the Class 1 Permit Modifications

Table 1. Class 1 Hazardous Waste Facility Permit Modifications

No.	Affected Permit Section	Item	Category	Attachment A Page #
1	a. Attachment B4	Revise the informational web page address	A.1	A-3
2	a. Attachment A b. Attachment O	Revise the DOE, CBFO Manager	A.1	

Item 1

Description:

Change the web page address that is used for WIPP informational purposes.

Basis:

The Permittees employ a web page to disseminate information regarding TRU mixed waste, regulatory compliance, operational and programmatic issues, methods development and other pertinent information that may be useful for generator/storage sites, stakeholders, and the general public. The address of this web page has recently changed. To keep the public informed, the Permittees believe that the HWFP should reflect this new address.

The change is an "Administrative and informational change" and is therefore a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion:

The previous web page address is now obsolete. To keep the public informed it is necessary to update the address in the HWFP.

Revised Permit Text:

- a.1 Attachment B4
B4-3f Audits of Acceptable Knowledge

The Permittees will conduct an initial audit of each site prior to certifying the site for shipment of TRU mixed waste to the WIPP facility. This initial audit will establish an approved baseline that will be reassessed annually by the Permittees. These audits will verify compliance with the requirements specified in the WAP (Permit Attachment B). The audits will be used to verify compliance with the compilation, application, and interpretation requirements of acceptable knowledge information specified in this Permit at all sites, and to evaluate the completeness and defensibility of site-specific acceptable knowledge documentation related to hazardous waste characterization. Permit Attachment B6 gives a description of the overall audit program and a required checklist. Figure B4-3 includes the primary steps associated with the audit process of acceptable knowledge.

Site-specific audit plans will be prepared by the Permittees and provided to NMED, and will identify the scope of the audit, requirements to be assessed, participating personnel, activities to be audited, organizations to be notified, applicable documents, and schedule. Audits will be performed in accordance with written procedures and site-specific checklists that will be developed by the Permittees prior to the audit and provided to NMED. The site-specific audit checklists will include items associated with the compilation and evaluation of the required acceptable knowledge information as specified in the checklist required by Permit Attachment B6.

Audit checklists shall include Table B6-3 in Permit Attachment B6, and will include but not be limited to the following elements for review during the audit:

- Documentation of the process used to compile, evaluate, and record acceptable knowledge is available and implemented;
- Personnel qualifications and training are documented;
- All of the required acceptable knowledge documentation specified in Section B4-2 has been compiled in an auditable record;
- All of the required procedures specified in B4-3 have been developed and implemented, including but not limited to:
 - A procedure exists for assigning hazardous waste codes to waste streams in accordance with Section B4-3;
 - A procedure exists for resolving discrepancies in acceptable knowledge documentation in accordance with Section B4-3;
 - A procedure exists for confirming acceptable knowledge information through: a) radiography or visual examination, b) headspace gas sampling and analysis, and c) homogeneous waste sampling and analysis in accordance with Section B4-3; and
- Results of other audits of the TRU mixed waste characterization programs at the site are available in site records.

Members of the audit team will be knowledgeable regarding the required acceptable knowledge information, RCRA regulations and EPA guidance regarding the use of acceptable knowledge for waste characterization, RCRA hazardous waste characterization, and the WAP requirements (Permit Attachment B). Audit team members will be independent of all TRU mixed waste management operations at the site being audited.

Auditors will evaluate acceptable knowledge documentation for at least one waste stream from the Summary Category Group(s) being audited, and will audit acceptable knowledge traceability for at least one container from the audited Summary Category Group(s). For these waste streams, auditors will review all procedures and associated processes developed by the site for documenting the process of compiling acceptable knowledge documentation; correlating information to specific waste inventories; assigning hazardous waste codes; and identifying, resolving, and documenting discrepancies in acceptable knowledge records. The adequacy of acceptable knowledge procedures and processes will be assessed and any deficiencies in procedures documented in the audit report.

Auditors will review the acceptable knowledge documentation for selected waste streams for logic, completeness, and defensibility. The criteria that will be used by auditors to evaluate the logic and defensibility of the acceptable knowledge documentation include completeness and traceability of the information, consistency of application of information, clarity of presentation, degree of compliance with this Permit Attachment with regard to acceptable knowledge

confirmation data, nonconformance procedures, and oversight procedures. Auditors will evaluate compliance with written site procedures for developing the acceptable knowledge record. A completeness review will evaluate the availability of all required TRU mixed waste management program information and TRU mixed waste stream information (Section B4-2). Records will be reviewed for correlation to specific waste streams and the basis for characterizing hazardous waste. Auditors will verify that sites include all required information and conservatively include all potential hazardous waste codes indicated by the acceptable knowledge records. All deficiencies in the acceptable knowledge documentation will be included in the audit report.

Auditors will verify and document that sites use administrative controls and follow written procedures to characterize hazardous waste for newly-generated and retrievably stored wastes. Auditors will review procedures used by the sites to confirm acceptable knowledge information using radiography or visual examination, headspace gas sampling and analysis, and homogeneous waste sampling and analysis. Procedures to document changes in acceptable knowledge documentation and changes to hazardous waste code assignments to specific waste streams also will be evaluated for compliance with the WAP (Permit Attachment B).

After the audit is complete, the Permittees will provide the site with preliminary results at a close-out meeting. The Permittees will prepare a final audit report that includes all observations and findings identified during the audit. Sites shall respond to all audit findings and identify corrective actions. Audit results will be included in the final audit report (Permit Attachment B6). If acceptable knowledge procedures do not exist, the required information is not available, or corrective actions (i.e., CARs) are identified associated with acceptable knowledge compilation, acceptable knowledge confirmation, and/or hazardous waste characterization, the Permittees will not manage, store, or dispose TRU mixed waste for the subject waste summary category. Management, storage, or disposal of the subject waste summary category at WIPP will not resume until the Permittees find that all corrective actions have been implemented and the site complies with all applicable requirements of the WAP.

The National TRU Program disseminates information regarding TRU mixed waste characterization requirements and program status through the WIPP Home Page at <http://www.wipp.ws> <http://www.wipp.energy.gov>. The Permittees will use this web page to disseminate information regarding TRU mixed waste streams, RCRA compliance, and operational and programmatic issues, methods development, and waste characterization information, including the application of acceptable knowledge. The Permittees are provided the required waste characterization information prior to management, storage, or disposal of that waste at WIPP and also will conduct audits at least annually. The Permittees will maintain an operating record for review during regulatory agency audits. NMED may also review any information relevant to the scope of the audit during site audits. The Permittees will notify NMED regarding any site's failure to implement corrective actions associated with hazardous waste characterization as specified in Modules I and II and Permit Attachment B3.

Item 2

Description:

Revise the HWFP to change the DOE, CBFO Manager from Lloyd L. Piper to David C. Moody, effective December 12, 2005.

Basis:

The change is administrative and informational in nature and is therefore a Class 1 notification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.1).

Discussion:

On December 12, 2005, Mr. Lloyd L. Piper was replaced by Mr. David C. Moody, as the DOE, CBFO Manager and responsible official for the DOE. This HWFP change is necessary as Mr. Moody becomes the signatory authority for the DOE.

Revised Permit Text:

a.1. Attachment A, Section A-1

NAME OF FACILITY:	Waste Isolation Pilot Plant
OWNER and CO-OPERATOR:	U.S. Department of Energy P.O. Box 3090 Carlsbad, NM 88221
CO-OPERATOR:	Washington TRU Solutions LLC P.O. Box 2078 Carlsbad, NM 88221
RESPONSIBLE OFFICIALS:	Lloyd L. Piper, Acting <u>David C. Moody</u> , Manager DOE/Carlsbad Field Office Richard Raaz, General Manager Washington TRU Solutions LLC
FACILITY MAILING ADDRESS:	U.S. Department of Energy P.O. Box 3090 Carlsbad, NM 88221
FACILITY LOCATION:	30 miles east of Carlsbad on the Jal Highway, in Eddy County.

TELEPHONE NUMBER:	505/234-7300
U.S. EPA I.D. NUMBER:	NM4890139088
GEOGRAPHIC LOCATION:	32° 22' 30" N 103° 47' 30" W
DATE OPERATIONS BEGAN:	November 26, 1999

b.1. Attachment O, Part A Application

A revised Part A Application is included in Attachment B

Attachment B
Attachment O, Part A

For EPA Regional Use Only	 United States Environmental Protection Agency Washington, DC 20460 <h2 style="margin: 0;">Hazardous Waste Permit Application Part A</h2> <p style="font-size: small; margin: 0;">(Read the Instructions before starting)</p>				
Date Received					
Month Day Year					
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; height: 20px;"></td> <td style="width:33%;"></td> <td style="width:33%;"></td> </tr> </table>					

I. Facility's EPA ID Number (Mark 'X' in the appropriate box)

<input type="checkbox"/> A. First Part A Submission	<input checked="" type="checkbox"/> B. Revised Part A Submission (Amendment # <u>21</u>)			
C. Facility's EPA ID Number	D. Secondary ID Number (If applicable)			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; text-align: center;">N M 4 8 9 0 1 3 9 0 8 8</td> <td style="width:33%;"></td> <td style="width:33%;"></td> </tr> </table>	N M 4 8 9 0 1 3 9 0 8 8			
N M 4 8 9 0 1 3 9 0 8 8				

II. Name of Facility

W A S T E I S O L A T I O N P I L O T P L A N T
--

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street		
3 0 M I L E S E A S T O F C A R L S B A D O N		
Street (Continued)		
J A L H I G H W A Y		
City or Town	State	Zip Code
C A R L S B A D	N M	8 8 2 2 1 -
County Code (if known)	County Name	
0 3	E D D Y	

B. Land Type	C. Geographic Location	D. Facility Existence Date
(Enter code)	LATITUDE (Degrees, minutes, & seconds)	LONGITUDE (Degrees, minutes & seconds)
F	3 2 2 2 3 0 N	1 0 3 4 7 3 0 W
	Month	Day
	0 5	1 8
	Year	1 9 8 1

IV. Facility Mailing Address

Street or P.O. Box		
P O B O X 3 0 9 0		
City or Town	State	Zip Code
C A R L S B A D	N M	8 8 2 2 1 - 3 0 9 0

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (Last)	(First)
M O O D Y	D A V I D C .
Job Title	Phone Number (Area Code and Number)
M A N A G E R	5 0 5 - 2 3 4 - 7 3 0 0

VI. Facility Contact Address (See instructions)

A. Contact Address	B. Street or P.O. Box	
Location Mailing Other		
<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	P O B O X 3 0 9 0	
City or Town	State	Zip Code
C A R L S B A D	N M	8 8 2 2 1 - 3 0 9 0

EPA ID Number (Enter from page 1)										Secondary ID Number (Enter from page 1)													
N	M	4	8	9	0	1	3	9	0	8	8												

XI. Nature of Business (Provide a brief description)

The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility intended to demonstrate the technical and operational principles involved in the permanent isolation and disposal of defense-generated transuranic waste. For purposes of RCRA, WIPP operations entail receiving, unloading, and transferring radioactive-mixed waste from the surface of the site to the underground hazardous waste management units. Waste will be emplaced in an underground geologic repository horizon located in a deep-bedded salt formation approximately 2,150 feet beneath the surface.

XII. Process Codes and Design Capacities

- A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.**
- B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.**
- AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
 - UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.**
- C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.**

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	
<u>Disposal:</u>						
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour	
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln		
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln		
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln		
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven		
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace		
<u>Storage:</u>						
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Btu Per Hour; Gallons Per Hour; Liters Per Hour; or Million Btu Per Hour	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor		
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace		
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace		
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid		
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces		
S99	Other Storage	Any Unit of Measure Listed Below	T93	Other Industrial Furnaces Listed in 40 CFR §260.10		
<u>Treatment:</u>						
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment		Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	<u>Miscellaneous (Subpart X):</u>			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below	
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day	
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour	
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters	
			X99	Other Subpart X	Any Unit of Measure Listed Below	

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	A
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
		Million Btu Per Hour	X	Btu Per Hour	I

EPA ID Number (Enter from page 1)										Secondary ID Number (Enter from page 1)													
N	M	4	8	9	0	1	3	9	0	8	8												

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>					
X	1	S	0	2	5 3 3 . 7 8 8		G	0 0 1			
	1	X	0	4	175,600 Total (54,064 in 10 years)		C	0 1 0			
	2				See attached page for additional process information						
	3	S	0	1	91.9		C	0 0 1			
	4				WHB Container Storage Unit See attached page for additional process information						
	5	S	0	1	47.1		C	0 0 1			
	6				Parking Area Container Storage Unit See attached page for additional process information						
	7										
	8										
	9										
1	0										
1	1										
1	2										
1	3										

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>		
X	1	T	0	4	.			In-situ Vitrification
	1				.			
	2				.			
	3				.			
	4				.			

EPA ID Number (Enter from page 1)										Secondary ID Number (Enter from page 1)													
N	M	4	8	9	0	1	3	9	0	8	8												

XIV. Description of Hazardous Wastes

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

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

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

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

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

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

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

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

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

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

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

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS											
				(1) PROCESS CODES (Enter)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))						
X 1	K 0 5 4	900	p	T	0	3	D	8	0						
X 2	D 0 0 2	400	P	T	0	3	D	8	0						
X 3	D 0 0 1	100	P	T	0	3	D	8	0						
X 4	D 0 0 2									Included With Above					

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
N	M	4	8	9	0	1	3	9	0	8	8												

XIV. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
	(1) PROCESS CODES (Enter code)												(2) PROCESS DESCRIPTION (If a code is not entered in D(1))					
1	F	0	0	1	1,891	M	X	0	4	S	0	1	S	0	1			
2	F	0	0	2	1,860	M	X	0	4	S	0	1	S	0	1			
3	F	0	0	3	1,593	M	X	0	4	S	0	1	S	0	1			
4	F	0	0	4	26	M	X	0	4	S	0	1	S	0	1			
5	F	0	0	5	1,829	M	X	0	4	S	0	1	S	0	1			
6	F	0	0	6	915	M	X	0	4	S	0	1	S	0	1			
7	F	0	0	7	915	M	X	0	4	S	0	1	S	0	1			
8	F	0	0	9	915	M	X	0	4	S	0	1	S	0	1			
9	D	0	0	4	903	M	X	0	4	S	0	1	S	0	1			
10	D	0	0	5	484	M	X	0	4	S	0	1	S	0	1			
11	D	0	0	6	1,819	M	X	0	4	S	0	1	S	0	1			
12	D	0	0	7	1,248	M	X	0	4	S	0	1	S	0	1			
13	D	0	0	8	3,246	M	X	0	4	S	0	1	S	0	1			
14	D	0	0	9	1,727	M	X	0	4	S	0	1	S	0	1			
15	D	0	1	0	186	M	X	0	4	S	0	1	S	0	1			
16	D	0	1	1	1,090	M	X	0	4	S	0	1	S	0	1			
17	D	0	1	8	749	M	X	0	4	S	0	1	S	0	1			
18	D	0	1	9	761	M	X	0	4	S	0	1	S	0	1			
19	D	0	2	1	26	M	X	0	4	S	0	1	S	0	1			
20	D	0	2	2	1,098	M	X	0	4	S	0	1	S	0	1			
21	D	0	2	6	609	M	X	0	4	S	0	1	S	0	1			
22	D	0	2	7	26	M	X	0	4	S	0	1	S	0	1			
23	D	0	2	8	449	M	X	0	4	S	0	1	S	0	1			
24	D	0	2	9	478	M	X	0	4	S	0	1	S	0	1			
25	D	0	3	0	26	M	X	0	4	S	0	1	S	0	1			
26	D	0	3	2	26	M	X	0	4	S	0	1	S	0	1			
27	D	0	3	4	26	M	X	0	4	S	0	1	S	0	1			
28	D	0	3	5	139	M	X	0	4	S	0	1	S	0	1			
29	D	0	3	6	26	M	X	0	4	S	0	1	S	0	1			
30	D	0	3	7	26	M	X	0	4	S	0	1	S	0	1			
31	D	0	3	8	26	M	X	0	4	S	0	1	S	0	1			
32	D	0	3	9	26	M	X	0	4	S	0	1	S	0	1			
33	D	0	4	0	140	M	X	0	4	S	0	1	S	0	1			
34	D	0	4	3	26	M	X	0	4	S	0	1	S	0	1			
35	P	0	1	5	945	M	X	0	4	S	0	1	S	0	1			

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)																								
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N	M	4	8	9	0	1	3	9	0	8	8														

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (See instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

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

Owner Signature	Date Signed
Name and Official Title (Type or print) David C. Moody, Manager, DOE/Carlsbad Field Office	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print) David C. Moody, Manager, DOE/Carlsbad Field Office	
Operator Signature	Date Signed
Name and Official Title (Type or print) Richard D. Raaz, General Manager – Washington TRU Solutions, LLC	

XIX. Comments

Section XVIII Operator Signature - *See attached "RCRA Part A Application Certification"

- Previous revisions were submitted on July 9, 1991; November 12, 1992; January 29, 1993; March 2, 1995; May 26, 1995; April 12, 1996; May 29, 1996; April 21, 1999; May 10, 1999; February 2, 2001; March 7, 2001; June 18, 2001; December 27, 2002; January 16, 2003, May 14, 2003, September 11, 2003, January 12, 2004, January 15, 2004, November 24, 2004, December 30, 2004, April 29, 2005, June 9, 2005, July 18, 2005, and December 12, 2005
- Part A originally signed on January 18, 1991, and submitted on January 22, 1991.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

RCRA PART A APPLICATION CERTIFICATION

The U.S. Department of Energy (DOE), through its Carlsbad Field Office, has signed as "owner and operator," and Washington TRU Solutions LLC, the Management and Operating Contractor (MOC), has signed this application for the permitted facility as "co-operator."

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

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

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

For purposes of the certification required by Title 20 of the New Mexico Administrative Code, Chapter 4, Part 1, Subpart IX, (20.4.1.900 NMAC), incorporating 40 CFR, §270.11(d), the DOE's and the MOC's representatives certify, under penalty of law that this document and all attachments were prepared under their direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on their inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of their knowledge and belief, true, accurate, and complete for their respective areas of responsibility. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner and Operator Signature: _____ David C. Moody
Title: _____ Manager, Carlsbad Field Office
_____ U.S. Department of Energy
Date: _____

Co-Operator Signature: _____ Richard D. Raaz
Title: _____ General Manager
for: _____ Washington TRU Solutions LLC
Date: _____