

**Class 1 Permit Modification Notification**

**Change in Department of Energy, Carlsbad Field Office Manager**

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

**Permit #NM4890139088-TSDF**

**October 2010**

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## Overview of the Permit Modification Notification

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

This PMN is being submitted by the U.S. Department of Energy (**DOE**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with Permit 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 PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of some changes which impact the WIPP facility. This change does not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the Permit and any related supporting documents are provided in this PMN. The proposed modification to the text of the Permit has been identified using **red** text and double underline and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text.

**Attachment A**

**Description of the Class 1 Permit Modification Notification**

**Table 1. Class 1 Hazardous Waste Facility Permit Modification Notification**

<b>Affected Permit Section</b>	<b>Change Description</b>	<b>Category</b>	<b>Attachment A Page #</b>
a. Attachment A b. Attachment O	Name change for the Department of Energy Carlsbad Field Office Manager	A.1	A-3

## Item 1

### Description:

Revise the Permit to change the Department of Energy, Carlsbad Field Office Manager from Mr. Dave Moody to Mr. Edward J. Ziemianski, effective October 10, 2010.

### Basis:

The change is classified as "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:

On October 10, 2010 Mr. Dave Moody, was replaced by Mr. Edward J. Ziemianski as the Acting Manager and responsible official for the Carlsbad Field Office. This Permit change is necessary as Mr. Ziemianski becomes the signatory authority for the Department of Energy, Carlsbad Field Office.

### Revised Permit Text:

#### a.1. Attachment A, Section A-1

Facility Description

#### Abstract

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:	<del>David C. Moody</del> <u>Edward J. Ziemianski, Acting</u> Manager DOE/Carlsbad Field Office Farok Sharif, 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:	575/234-7300
U.S. EPA I.D. NUMBER:	NM4890139088
GEOGRAPHIC LOCATION:	32° 22' 30" N 103° 47' 30" W
DATE OPERATIONS BEGAN:	November 26, 1999

**Attachment B**  
**Attachment O, Part A**



9. Legal Owner (Continued) Address	Street or P. O. Box:	
	City, Town, or Village:	
	State:	
	Country:	Zip Code:

**10. Type of Regulated Waste Activity**  
 Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

**A. Hazardous Waste Activities**  
 Complete all parts for 1 through 6.

<p>Y <input type="checkbox"/> N <input type="checkbox"/> <b>1. Generator of Hazardous Waste</b>                  If "Yes", choose only one of the following - a, b, or c.</p> <p><input type="checkbox"/> a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or</p> <p><input type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or</p> <p><input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste</p> <p><b>In addition, indicate other generator activities.</b></p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> d. United States Importer of Hazardous Waste</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator</p>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> <b>2. Transporter of Hazardous Waste</b></p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> <b>3. Treater, Storer, or Disposer of Hazardous Waste (at your site)</b> Note: A hazardous waste permit is required for this activity.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> <b>4. Recycler of Hazardous Waste (at your site)</b></p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> <b>5. Exempt Boiler and/or Industrial Furnace</b>                  If "Yes", mark each that applies.</p> <p><input type="checkbox"/> a. Small Quantity On-site Burner Exemption</p> <p><input type="checkbox"/> b. Smelting, Melting, and Refining Furnace Exemption</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> <b>6. Underground Injection Control</b></p>
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**B. Universal Waste Activities**

Y  N  **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:**

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y  N  **2. Destination Facility for Universal Waste**  
 Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**  
 Mark all boxes that apply.

Y  N  **1. Used Oil Transporter**  
 If "Yes", mark each that applies.

a. Transporter

b. Transfer Facility

Y  N  **2. Used Oil Processor and/or Re-refiner**  
 If "Yes", mark each that applies.

a. Processor

b. Re-refiner

Y  N  **3. Off-Specification Used Oil Burner**

Y  N  **4. Used Oil Fuel Marketer**  
 If "Yes", mark each that applies.

a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

b. Marketer Who First Claims the Used Oil Meets the Specifications



Hazardous Waste Codes  
(Continued)

EPA ID No.: NM4890139088
Hazardous Waste Numbers
D027
D028
D029
D030
D032
D034
D035
D036
D037
D038
D039
D040
D043
P015
U002
U019
U037
U043
U044
U052
U070
U072
U078
U079
U105
U122
U133
U151
U154
U159
U196
U209
U210
U220
U226
U228
U239
P120
U134
D033
P030
P098
P099
P106
U003
U103
U108

United States Environmental Protection Agency  
**HAZARDOUS WASTE PERMIT INFORMATION FORM**

<b>1. Facility Permit Contact (See instructions on page 23)</b>	First Name:	MI:	Last Name:
	Phone Number:		Phone Number Extension:
<b>2. Facility Permit Contact Mailing Address (See instructions on page 23)</b>	Street or P.O. Box:		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	
<b>3. Operator Mailing Address and Telephone Number (See instructions on page 23)</b>	Street or P.O. Box:		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	Phone Number
<b>4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)</b>	Street or P.O. Box:		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	Phone Number
<b>5. Facility Existence Date (See instructions on page 24)</b>	Facility Existence Date (mm/dd/yyyy):		

**6. Other Environmental Permits (See instructions on page 24)**

A. Permit Type <i>(Enter code)</i>	B. Permit Number	C. Description

**7. Nature of Business (Provide a brief description; see instructions on page 24)**

**8. Process Codes and Design Capacities (See instructions on page 24) - Enter information in the Sections on Form Page 3.**

**A. PROCESS CODE - Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen 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), enter the process information in Item 9 (including a description).**

**B. PROCESS DESIGN CAPACITY- For each code entered in Section A, enter the capacity of the process.**

- 1. 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.**
- 2. UNIT OF MEASURE - For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.**

**C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each 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>			<u>Treatment (continued):</u>	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	For T81-T93:
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate 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; Short Tons Per Day; Btu Per Hour
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 in Code Table Below	T86	Blast Furnace	
	<u>Storage:</u>		T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
S99	Other Storage	Any Unit of Measure in Code Table Below	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
	<u>Treatment:</u>			<u>Miscellaneous (Subpart X):</u>	
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day	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
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	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
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	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	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.....	B
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

**8. Process Codes and Design Capacities (Continued)**

*EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.*

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only				
				(1) Amount (Specify)	(2) Unit of Measure (Enter code)						
X 1	S	0	2	5 3 3 . 7 8 8	G	0 0 1					
1				.							
2				.							
3				.							
4				.							
5				.							
6				.							
7				.							
8				.							
9				.							
1 0				.							
1 1				.							
1 2				.							
1 3				.							
1 4				.							
1 5				.							

**NOTE:** If you need to list more than 15 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 9.

**9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)**

Line Number (Enter #s in sequence with Item 8)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
				(1) Amount (Specify)	(2) Unit of Measure (Enter code)		
X 2	T	0	4	1 0 0 . 0 0 0	U	0 0 1	In-situ Vitrification
				.			
				.			
				.			
				.			
				.			
				.			
				.			
				.			

**10. Description of Hazardous Wastes (See instructions on page 25) - Enter information in the Sections on Form Page 5.**

- 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 Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section 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 Section 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 Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

*For non-listed hazardous waste:* For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A 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 10.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(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 Section A. On the same line complete Sections 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 Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section 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 10 (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 operations. 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 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))									
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

10. Description of Hazardous Wastes (Continued. Use the Additional Sheet(s) as necessary; number pages as 5 a, etc.)

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																
2																
3																
4																
5																
6																
7																
8																
9																
1 0																
1 1																
1 2																
1 3																
1 4																
1 5																
1 6																
1 7																
1 8																
1 9																
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3 5																
3 6																
3 7																
3 8																
3 9																





NM4890139088

### 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 (20.4.1 NMAC), Subpart IX, §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: Original signed by Edward J. Ziemianski  
Title: Acting Manager, Carlsbad Field Office  
for: U.S. Department of Energy  
Date: October 12, 2010

Co-Operator Signature: Original signed by Farok Sharif  
Title: General Manager  
for: Washington TRU Solutions LLC  
Date: October 12, 2010

NM4890139088

### 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.

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Owner and Operator Signature:

Title: Acting Manager, Carlsbad Field Office  
for: U.S. Department of Energy  
Date: October 12, 2010

Co-Operator Signature:

Title: General Manager  
for: Washington TRU Solutions LLC  
Date: October 12, 2010