



**Department of Energy**  
Carlsbad Field Office  
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October 9, 2025

Mr. JohnDavid Nance, Bureau Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

Subject: Class 1 Permit Modification Notification, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Nance:

The purpose of this letter is to provide the New Mexico Environment Department with the Class 1 Permit Modification Notification for the following items:

- Update Permit Part 4, Table 4.6.2.3, Recommended EPA Risk Factors
- Update Permit Attachment D, Table D-1, Resource Conservation and Recovery Act Emergency coordinators
- Update Permit Attachment D, Figure D-3, Underground Escape and Evacuation Map

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.

Mr. Michael Gerle, Director, Environmental Regulatory Compliance Division, is your point of contact regarding any technical questions or comments. Mr. Gerle can be reached at (575) 988-5372.

Sincerely,

*//Signatures on File//*

*//Signatures on File//*

Mark Bollinger  
Manager  
Carlsbad Field Office

Ken Harrawood  
Program Manager  
Salado Isolation Mining Contractors, LLC

Enclosure

cc: w/enclosure

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\*ED denotes electronic distribution

**Class 1 Permit Modification Notifications**

- 1. Update Permit Part 4, Table 4.6.2.3, *Recommended EPA Risk Factors***
- 2. Update Attachment D, Table D-1, *Resource Conservation and Recovery Act  
Emergency Coordinators***
- 3. Update Attachment D, Figure D-3, *Underground Escape and Evacuation Map***

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

**WIPP Permit Number - NM4890139088-TSDF**

**October 2025**

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## Acronyms and Abbreviations

CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
EPA	U. S. Environmental Protection Agency
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
MSHA	Mine Safety and Health Administration
Permit	Waste Isolation Pilot Plant Hazardous Waste Facility Permit
Permittees	U.S. Department of Energy and Salado Isolation Mining Contractors LLC
PMN	Permit Modification Notification
PPA	Property Protection Area
RCRA	Resource Conservation and Recovery Act
RfC	non-carcinogenic reference concentrations
SCSR	Self Contained Self Rescuer
SSCVS	Safety Significant Confinement Ventilation System
IUR	Inhalation Unit Risk
WIPP	Waste Isolation Pilot Plant

## Overview of the Permit Modification Notification

This document contains three Class 1 Permit Modification Notifications (**PMNs**) for the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit (**Permit**) Number NM4890139088-TSDF.

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Salado Isolation Mining Contractors LLC, collectively referred to as the Permittees, in accordance with Permit Part 1, Section 1.3.1, (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 Code of Federal Regulations (**CFR**) §270.42(a)). The PMNs in this document are necessary to notify the New Mexico Environment Department (**NMED**) of changes which impact the Permit. These changes do not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modification 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.

**Attachment A**  
**Description of the Class 1 Permit Modification Notifications**

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

Item No.	Affected Permit Section	Change Description	Category
1	Part 4, Table 4.6.2.3 - <i>Recommended EPA Risk Factors</i>	This modification updates two recommended EPA non-carcinogenic reference concentrations.	A.1
2	Attachment D, Table D-1, <i>Resource Conservation and Recovery Act Emergency Coordinators</i>	This modification updates the Emergency Coordinators list to reflect the removal of three RCRA Emergency Coordinators and the addition of one RCRA Emergency Coordinator at the WIPP facility.	B.6.d
3	Attachment D, Figure D-3, <i>Underground Escape and Evacuation Map</i>	This modification replaces the current Underground Escape and Evacuation Map to replaces this figure with the most recent revision	A.1

## Item 1

### Description

This modification revises two recommended EPA non-carcinogenic reference concentrations (**RfCs**) in Permit Part 4, Table 4.6.2.3, *Recommended EPA Risk Factors* and revised the RfC and the Inhalation Unit Risk (**IUR**) footnotes. Permit Part 4 is updated with the following changes:

- Table 4.6.2.3, *Recommended EPA Risk Factors*
  - Column titled “Non-carcinogenic RfC (mg/m<sup>3</sup>)”
    - Changed the RfC value from “9.8x10<sup>-2</sup>” to “1.95x10<sup>-3</sup>” in the “Chloroform” row.
    - Changed the RfC value from “2.0x10<sup>-1</sup>” to “3.96x10<sup>-3</sup>” in the “1,1-Dichloroethylene” row
  - Footnotes
    - Added “and/or EPA Regional Screening Levels Generic Tables” to both IUR and RfC footnote

### Basis

This change is classified as an “Administrative and informational change” and is, therefore, a Class 1 Permit modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, A.1).

### Discussion

This change is needed to comply with Permit Part 4, Section 4.6.2.3, which states; *The Permittees shall review EPA risk factors and the tentatively identified compound list annually and will submit the appropriate permit modification to update Table 4.6.2.3 as needed.* The Permittees annual review of the applicable EPA risk factors identified changes to the non-carcinogenic RfCs for chloroform and 1,1-dichloroethylene. The new RfC values for chloroform and 1,1-dichloroethylene are 1.95x10<sup>-3</sup> mg/m<sup>3</sup> and 3.96x10<sup>-3</sup> mg/m<sup>3</sup>, respectively. The EPA RfC values are in the Regional Screening Level (**RSL**) Summary Table (Resident Air, TR=1E-06, HQ=1) November 2024 found at the following link; [Regional Screening Levels \(RSLs\) - Generic Tables | US EPA](#). The following language was added to Table 4.6.2.3 IUR and RfC footnotes because EPA ultimately publishes the screening levels in their Regional Screening Levels Generic Tables; “and/or EPA Regional Screening Levels Generic Tables”. This change does not impact meeting the Permit Part 4, Section 4.6.2.3, non-carcinogenic risk limit because historical Volatile Organic Compound Repository Monitoring results indicate that the total running annual average non-carcinogenic risk is well below the Permit required hazard index of 1.0.

Revised Permit Text:

Table 4.6.2.3 - Recommended EPA Risk Factors

Compound	Carcinogenic IUR ( $\mu\text{g}/\text{m}^3$ ) <sup>-1</sup>	Non-carcinogenic RfC ( $\text{mg}/\text{m}^3$ )
Carbon Tetrachloride	$6.0 \times 10^{-6}$	$1.0 \times 10^{-1}$
Chlorobenzene	N/A	$5.0 \times 10^{-2}$
Chloroform	$2.3 \times 10^{-5}$	<del><math>9.8 \times 10^{-2}</math></del> <u><math>1.95 \times 10^{-3}</math></u>
1,1-Dichloroethylene	N/A	<del><math>2.0 \times 10^{-1}</math></del> <u><math>3.96 \times 10^{-3}</math></u>
1,2-Dichloroethane	$2.6 \times 10^{-5}$	$7.0 \times 10^{-3}$
Methylene Chloride	$1.0 \times 10^{-8}$	$6.0 \times 10^{-1}$
1,1,2,2-Tetrachloroethane	$5.8 \times 10^{-5}$	N/A
Toluene	N/A	5.0
1,1,1-Trichloroethane	N/A	5.0
Trichloroethylene	$4.1 \times 10^{-6}$	$2.0 \times 10^{-3}$

IUR = Inhalation Unit Risk from EPA Integrated Risk Information System (IRIS) Database [and/or EPA Regional Screening Levels Generic Tables](#)

RfC = Reference Concentration from EPA IRIS Database [and/or EPA Regional Screening Levels Generic Tables](#)

N/A = not applicable (No value published in the IRIS Database)

## Item 2

### Description

This modification updates the Resource Conservation and Recovery Act (**RCRA**) Emergency Coordinators list to reflect the removal of three RCRA Emergency Coordinators and the addition of one new RCRA Emergency Coordinator at the WIPP facility. Permit Attachment D is updated with the following changes:

- Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators*
  - Removed M.L. (Martin) Mendes, (575) 234-8276
  - Removed G.W. (Gregory) Brown, (575) 234-8276
  - Removed M.G. (Mike) Proctor, (575) 234-8276
  - Added M.A. (Michael) Harris, (575) 234-8276

### Basis

This change is classified as "General Facility Standards, Contingency Plan: Changes in name, address, or phone number of coordinators or other persons or agencies identified in the plan" and is therefore a Class 1 modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.42, Appendix I, B.6.d).

### Discussion

This change is needed to update the list of persons qualified to act as the RCRA Emergency Coordinator and to ensure the respective information is accurate and current. This list must be kept up to date pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.52(d)). The Permittees are removing M.L. (Martin) Mendes, G.W. (Gregory) Brown, and M.G. (Mike) Proctor to the list of RCRA Emergency Coordinators. The Permittees are adding M.A. (Michael) Harris to the list of RCRA Emergency Coordinators.

**Revised Permit Text:**

**Table D-1  
Resource Conservation and Recovery Act Emergency Coordinators<sup>1</sup>**

<b>Name</b>	<b>Address*</b>	<b>Office Phone</b>	<b>Personal Phone*</b>	<b>24-Hour Emergency Phone</b>
J.E. (Joseph) Bealler		(575) 234-8276 or (575) 234-8916		(575) 234-8111
<del>M.C. (Mike) Proctor</del>		<del>(575) 234-8276 or (575) 234-8143</del>		<del>(575) 234-8111</del>
P.J. (Paul) Paneral		(575) 234-8498		(575) 234-8111
A.C. (Andy) Cooper		(575) 234-8197		(575) 234-8111
C.J. (Chris) Belis		(575) 628-5851		(575) 234-8111
B.R. (Bobby) Franco		(575) 234-8163		(575) 234-8111
<del>G.W. (Gregory) Brown</del>		<del>(575) 234-5862</del>		<del>(575) 234-8111</del>
R.E. (Eric) Chavez		(575) 234-5831		(575) 234-8111
D.L. (Donald) Jurney		(575) 234-8216		(575) 234-8111
R.H. (Robert) Valenzuela		(575) 234-8799		(575) 234-8111
J.R. (James) Bailey		(575) 234-8276		(575) 234-8111
<del>M.L. (Martin) Mendes</del>		<del>(575) 234-5822</del>		<del>(575) 234-8111</del>
D.J. (Derek) Tweedy		(575) 234-8272		(575) 234-8111
J.W. (Justin) Bailey		(575) 234-8276		(575) 234-8111
J.N. (Jacob) Galindo		(575) 234-8276		(575) 234-8111
D.W. (Devlin) Willingham		(575) 234-8276		(575) 234-8111
S.B. (Samuel) Vasquez		(575) 234-8276		(575) 234-8111
C.L. (Cody) Rich		(575) 234-8276		(575) 234-8111
T.B. (Trevor) Dominguez		(575) 234-8276		(575) 234-8111
D.D. (Dario) Corral		(575) 234-8276		(575) 234-8111
T.K. (Taren) Wright		(575) 234-8276		(575) 234-8111
E.T. (Eric) Galindo		(575) 234-8276		(575) 234-8111
<u>M.A. (Michael) Harris</u>		<u>(575) 234-8276</u>		<u>(575) 234-8111</u>

\* NOTE: Personal information (home addresses and personal phone numbers) has been removed from informational copies of this Permit.

<sup>1</sup> For every shift, one qualified RCRA Emergency Coordinator serves as the primary, and a second qualified RCRA Emergency Coordinator is available to serve as the alternate.

### Item 3

#### Description

Permit Attachment D is updated with the following changes:

- Figure D-3, *Underground Escape and Evacuation Map*
  - Replaces this figure with the most recent revision

#### Basis

This change is classified as 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

This modification replaces the Underground Escape and Evacuation Map with an updated version depicting current underground evacuation routes and designated assembly areas which each contain a mine pager phone, miner’s aid station, and evacuation maps.

These changes are needed to update Figure D-3 to depict underground evacuation routes and assembly area pursuant to Permit Attachment D, Sections D-8b and D-8d and to reflect the current underground configuration.

Permit Attachment D identifies in Section D-8d, *Plan for Underground Evacuation* that detailed descriptions of escapeways and an underground escape map are included in the Underground Escape and Evacuation Plan on file at the WIPP facility, as required by Mine Safety and Health Administration (**MSHA**), 30 CFR §57.11053, for underground mining situations. The MSHA required map takes precedence over Figure D-3, *Underground Escape and Evacuation Map*, should an underground mine related event occur necessitating a change to the evacuation routes.

Revised Permit Text:

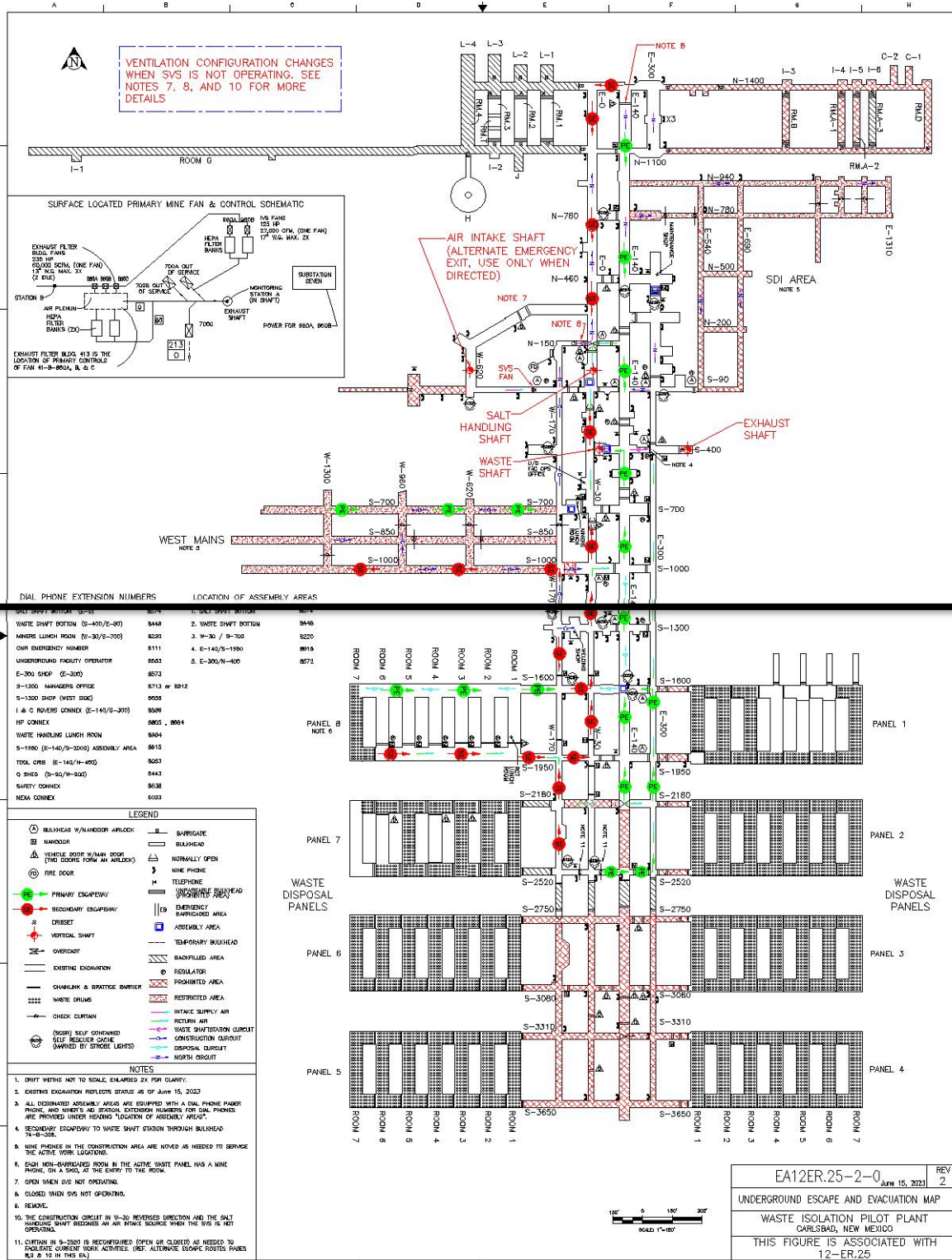


Figure D-3  
Underground Escape and Evacuation Map

