Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

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

Dear Mr. Kieling:

Enclosed is a Notification of Class 1 Permit Modifications covering the following items:

- Revise Attachment A4, Figure A4-2 to Add the New East Gate
- Revise Attachment A4, Section A4-2 to Describe the Purpose of the New East Gate

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.

If you have any questions, please contact Mr. Anthony Stone at (575) 234-7475.

Sincerely,

Philip J. Breidenbach, Project Manager
Nuclear Waste Partnership LLC

Original Signatures on File

Dana C. Bryson, Acting Manager
Carlsbad Field Office

Enclosure

cc: w/enclosure
K. Roberts, NMED * ED
R. Maestas, NMED ED
C. Smith, NMED ED
S. Holmes, NMED ED
CBFO M&RC
*ED denotes electronic distribution
Class 1 Permit Modification Notifications

Revise Attachment A4, Figure A4-2 to Add the New East Gate

Revise Attachment A4, Section A4-2 to Describe the Purpose of the New East Gate

Waste Isolation Pilot Plant
Carlsbad, New Mexico

WIPP Permit Number - NM4890139088-TSDF

September 2015
Table of Contents

Transmittal Letter

Table of Contents................................................................................................................................................... i
Overview of the Permit Modification Notifications............................................................................................................. 1
Attachment A Description of the Class 1 Permit Modification Notifications ................................................................. A-1
  Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications ......................................................... A-2
Item 1 ......................................................................................................................................................................................... A-3
  Description ........................................................................................................................................................................... A-3
  Basis ....................................................................................................................................................................................... A-3
  Discussion ............................................................................................................................................................................ A-3
  Proposed Revised Permit Figure: .................................................................................................................................. A-4
Item 2 ......................................................................................................................................................................................... A-6
  Description ........................................................................................................................................................................... A-6
  Basis ....................................................................................................................................................................................... A-6
  Discussion ............................................................................................................................................................................ A-6
  Proposed Revised Permit Text: ................................................................................................................................ A-7
Overview of the Permit Modification Notifications

This document contains two (2) 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 Nuclear Waste Partnership 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 of the 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 WIPP facility. These changes do 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 these PMNs. The proposed modifications 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 Notifications
Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Affected Permit Section</th>
<th>Change Description</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Attachment A4, Figure A4-2</td>
<td>This modification updates Attachment A4, Figure A4-2 <em>WIPP Traffic Flow Diagram</em> to show the new east gate which is scheduled to be installed in the east fence line.</td>
<td>A.1</td>
</tr>
<tr>
<td>2</td>
<td>Attachment A4, Section A4-2</td>
<td>This modification adds a sentence to Permit Attachment A4, Section A4-2 to describe the purpose of the new east gate and to address security.</td>
<td>A.1</td>
</tr>
</tbody>
</table>
Item 1

Description

This modification updates Attachment A4, Figure A4-2 *WIPP Traffic Flow Diagram* to show the new east gate which is scheduled to be installed in the east fence line.

Basis

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

Discussion

This change is needed to update the traffic flow diagram to accurately reflect the new east gate which will be used to allow delivery of large components and equipment for the new underground ventilation system. Other than the addition of the new east gate, there are no other changes to this figure. Other portions of the Permit related to fence security will remain in effect. This gate is not intended for waste handling activities. Updates to similar figures in Attachment D of the Permit will be made at a future date when the Attachment is revised.
Proposed Revised Permit Figure:

Figure A4-2
WIPP Traffic Flow Diagram
Figure A4-2
WIPP Traffic Flow Diagram
Item 2

Description

This modification adds a sentence to Permit Attachment A4, Section A4-2 to describe the purpose of the new east gate and to address security.

Basis

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

Discussion

This change is needed to address the new point of access and its effect on traffic. This change correlates the text with the revised Figure A4-2.
Proposed Revised Permit Text:

A4-2 Facility Access and Traffic

Access to the facility for personnel, visitors, and trucks carrying supplies and TRU mixed waste is provided through a security checkpoint (vehicle trap). After passing through the security checkpoint, TRU mixed waste transport trucks will normally turn right (south) before reaching the Support Building and then left (east) to park in the parking area HWMU just east of the air locks (Figure A4-2). Outgoing trucks depart the same way they arrived, normally out of the west end of the parking area, north through the fence gate and out through the vehicle trap. An alternate inbound route is to continue straight ahead from the security checkpoint to the second road and to turn south to enter the truck parking area. The alternate outbound route is also the reverse of this route. Salt transport trucks, which remove mined salt from the Salt Handling Shaft area, will not cross paths with TRU mixed waste transporters; instead, they will proceed from the Salt Handling Shaft northward to the salt pile. After passing through security, access for large equipment may be provided through the east gate. Figure A4-2 shows surface traffic flow at the WIPP facility.