

READ ME

This “READ ME” file is presented to facilitate the review of the Department of Energy *Waste Isolation Pilot Plant Hazardous Waste Facility Permit Amended Renewal Application*, September 2009 (Renewal Application). It is intended to provide information on the organization of the Renewal Application. The organization of the Renewal Application was developed to identify the regulatory requirements for a renewal application and provide the information that addresses those regulatory requirements.

A Regulatory Requirements Crosswalk identifies New Mexico Hazardous Waste Management Regulation citations that are to be addressed in a renewal application. It contains not only the relevant requirement citations, but also a description of the requirement and the Renewal Application location where the requirement is addressed. If the requirement is not applicable to the Waste Isolation Pilot Plant (**WIPP**) facility, an explanation is provided.

The WIPP Renewal Application contains two parts: the Part A and the Part B applications; it also contains other information the Permittees believe will be helpful in the review of the Renewal Application. To address the requirements in the Part A and Part B applications, two documents are presented with the *verbatim* requirements for the different applications:

- *Necessary Information for the WIPP Ten Year Renewal Application, Part A*
- *Necessary Information for the WIPP Ten Year Renewal Application, Part B*

The necessary information for the Part A application addresses the requirements for Part A and provides the basic and general information about the facility, processes, and waste to be treated, stored or disposed. The WIPP facility has storage and disposal units which are the subject of the Renewal Application. The WIPP facility does not treat hazardous waste.

The necessary information for the Part B addresses the requirements for Part B and contains specific information regarding how waste is managed, stored, and disposed, including the various aspects of how the WIPP facility is operated (e.g., safety, training, monitoring). Information regarding the Permittees’ plans to analyze waste to ensure that it meets the acceptance criteria for the WIPP facility is also presented. The necessary information for the Part B contains three distinct sections:

- General and specific facility requirements found in 20.4.1.500 NMAC incorporating 40 CFR 264 Subparts A through G
- Specific requirements for containers found in 20.4.1.500 NMAC incorporating 40 CFR 264 Subpart I
- Specific requirements for miscellaneous units found in 20.4.1.500 NMAC incorporating 40 CFR 264 Subpart X

The text in the necessary information for the Part B will point the reviewer to where the requirement is fully addressed in the Part B chapters, appendices, and addenda. The Part B chapters and appendices are based upon the WIPP Hazardous Waste Facility Permit.

In the chapters and appendices of the Renewal Application, the terms “Module” and “Attachment” are used in the context of identifying the May 22, 2009 version of the Permit requirement or condition. Furthermore, when the terms “chapter” or “appendix” are used in this Renewal Application, they refer to permit applications, either the original 1997 WIPP Part B Application or this Renewal Application. When the New Mexico Environment Department (**NMED**) writes the draft Permit, the chapters and appendices will be identified as permit “Attachments.” The NMED will write the permit “Modules.”

Three addenda to the Chapters are included in the Renewal Application to provide significant information pertaining to topic(s) contained in the associated chapters and appendices. The addenda and the reasons for including them are as follows:

- Addendum B1, *Dispute Resolution* (This is a provision that is contained in Module I of the Permit that the Permittees wish to retain in the renewed Permit)
- Addendum L1, *Site Characterization* (This updates information referenced extensively in Attachment L of the Permit)
- Addendum N1, *300-year Performance Demonstration Re-Evaluation* (This updates information that was used to prepare the Permit. The original analysis and the updated information reach the same conclusion that the only significant pathway from the miscellaneous unit is the air pathway involving the release of volatile organic compounds from containers prior to final facility closure.)