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## PART 1 - GENERAL PERMIT CONDITIONS

### 1.1. AUTHORITY

This Permit is issued pursuant to the authority of the Secretary of the New Mexico Environment Department (**Secretary**) under the New Mexico Hazardous Waste Act (**HWA**), NMSA 1978, §§74-4-1 through 74-4-14, in accordance with the New Mexico Hazardous Waste Management Regulations (**HWMR**), 20.4.1 NMAC.

Pursuant to the Resource Conservation and Recovery Act (**RCRA**), 42 U.S.C. §§6901 to 6992k, and 40 CFR Part 271 and Part 272 Subpart GG, the State of New Mexico, through the Secretary, is authorized to administer and enforce the state hazardous waste management program under the HWA in lieu of the federal program.

This Permit contains terms and conditions that the Secretary has determined are necessary to protect human health and the environment, pursuant to 20.4.1.900 NMAC (incorporating 40 CFR §270.32(b)(2)).

Any violation of a condition in this Permit may subject the Permittees or their officers, employees, successors, and assigns to:

- 1) A compliance order under §74-4-10 of the HWA or §3008(a) of RCRA (42 U.S.C. §6928(a));
- 2) An injunction under §74-4-10 of the HWA or §3008(a) of RCRA (42 U.S.C. §6928(a)), or §7002(a) of RCRA (42 U.S.C. §6972(a));
- 3) Civil penalties under §§74-4-10 and 74-4-10.1 of the HWA or §§3008(a) and (g) of RCRA (42 U.S.C. §§6928(a) and (g)), or §7002(a) of RCRA (42 U.S.C. §6972(a));
- 4) Criminal penalties under §74-4-11 of the HWA or §§3008(d), (e), and (f) of RCRA (42 U.S.C. §§6928(d), (e), and (f)); or
- 5) Some combination of the foregoing.

The list of authorities in this paragraph is not exhaustive and the Secretary reserves the right to take any action authorized by law to enforce the requirements of this Permit.

### 1.2. EFFECT OF PERMIT

The Secretary issues this Permit to the United States Department of Energy (**DOE**), the owner and co-operator of the Waste Isolation Pilot Plant (**WIPP**) (EPA I.D. Number NM4890139088), and Nuclear Waste Partnership LLC, Management and Operating Contractor (**MOC**), the co-operator of WIPP. This Permit authorizes DOE and MOC (**the Permittees**) to manage, store, and dispose contact-handled (**CH**) and remote-handled (**RH**) transuranic (**TRU**) mixed waste at WIPP, and establishes the general and specific standards for these activities, pursuant to the HWA and HWMR.



As to those activities specifically authorized or otherwise specifically addressed under this Permit, compliance with this Permit during its term shall constitute compliance, for purposes of enforcement, with Subtitle C of RCRA and the HWA, and the implementing regulations at 40 CFR Parts 264, 266, and 268 except for those requirements that become effective by statute after the Permit has been issued [20.4.1.900 NMAC (incorporating 40 CFR §270.4)]

Compliance with this Permit shall not constitute a defense to any order issued or any action brought under Sections 74-4-10.E or 74-4-13 of the HWA; Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9601 *et seq.*, commonly known as CERCLA) Sections 106(a), 104, or 107; or any other federal, state, or local law providing for protection of public health or the environment. This Permit does not convey any property rights of any sort or any exclusive privilege, nor authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations. [20.4.1.900 NMAC (incorporating 40 CFR §§270.4, 270.30(g), and 270.32(b)(1))]

### 1.3. PERMIT ACTIONS

#### 1.3.1. Permit Modification, Suspension, and Revocation

This Permit may be modified, suspended, and/or revoked for cause as specified in Section 74-4-4.2 of the HWA and 20.4.1.900 NMAC (incorporating 40 CFR §§270.41, 270.42, and 270.43). The filing of a request by the Permittees for a permit modification, suspension, or revocation, or the notification of planned changes or anticipated noncompliance, shall not stay any permit condition. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(f))]

This permit shall be revoked within 30 calendar days if the Land Withdrawal Act (Pub. L. 102-579, as amended) volumetric disposal limit for TRU waste of 6.2 million cubic feet at the WIPP facility is increased or otherwise changed by the U.S. Congress.

#### 1.3.2. Permit Renewal

The Permittees may renew this Permit by submitting an application for a new Permit at least 180 calendar days before the expiration date of this Permit. In reviewing any application for a Permit renewal, the Secretary shall consider improvements in the state of control and measurement technology and changes in applicable regulations. [20.4.1.900 NMAC (incorporating 40 CFR §§270.10(h) and 270.30(b))]

#### 1.3.3. Permit Review

The Secretary shall review this Permit no later than five (5) years after the effective date of this Permit, and shall modify this Permit as necessary pursuant to Section 74-4-4.2 of the HWA and 20.4.1.900 NMAC (incorporating 40 CFR §270.41). Such modification(s) shall not extend the effective term of this Permit specified in Permit Section 1.7.2. [20.4.1.900 NMAC (incorporating 40 CFR §§270.41 and 270.50(b) and (d))]

#### 1.4. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. [40 CFR §124.16(a)(1) and (2)]

#### 1.5. DEFINITIONS

Unless otherwise expressly provided herein, the terms used in this Permit shall have the meaning set forth in RCRA, HWA, and/or their implementing regulations.

##### 1.5.1. Contact-handled Transuranic Mixed Waste

“Contact-handled transuranic mixed waste” means transuranic mixed waste with a surface dose rate not greater than 200 millirem per hour. [Pub. L. 102-579 (1992)]

##### 1.5.2. Remote-handled Transuranic Mixed Waste

“Remote-handled transuranic mixed waste” means transuranic mixed waste with a surface dose rate of 200 millirem per hour or greater. For WIPP, the surface dose rate shall not exceed 1,000 rems per hour. [Pub. L. 102-579 (1992)]

##### 1.5.3. Facility

“Facility” or “permitted facility” means the Waste Isolation Pilot Plant (**WIPP**) owned by the DOE and located approximately ~~twenty-six~~**twenty-six** (26) miles east of Carlsbad, New Mexico, EPA I.D. Number NM4890139088. The WIPP facility comprises the entire complex within the WIPP Site Boundary as specified in the WIPP Land Withdrawal Act of 1992, Pub. L. 102-579 (1992), including all contiguous land, and structures, other appurtenances, and improvements on the Permittees' land, used for management, storage, or disposal of TRU mixed waste.

##### 1.5.4. Permittees

“Permittees” means the United States Department of Energy (**DOE**), an agency of the Federal government, and the owner and co-operator of the WIPP facility; and Nuclear Waste Partnership LLC, Management and Operating Contractor (**MOC**), the co-operator of the WIPP facility. References to actions taken by “the Permittees” indicate actions that may be taken by either co-Permittee.

##### 1.5.5. Secretary

“Secretary” means the Secretary of the New Mexico Environment Department (**NMED**), or designee.

#### 1.5.6. TRU Waste

“TRU Waste” means waste containing more than 100 nanocuries of alpha-emitting transuranic isotopes per gram of waste, with half-lives greater than 20 years, except for (A) high-level radioactive waste; (B) waste that the DOE Secretary has determined, with the concurrence of the EPA Administrator, does not need the degree of isolation required by the disposal regulations; or (C) waste that the Nuclear Regulatory Commission has approved for disposal on a case-by-case basis in accordance with part 61 of title 10, Code of Federal Regulations. [Pub. L. 102-579 (1992)]

#### 1.5.7. TRU Mixed Waste

“TRU Mixed Waste” means TRU waste that is also a hazardous waste as defined by the HWA and 20.4.1.200 NMAC (incorporating 40 CFR §261.3).

#### 1.5.8. Contact Handled Packages

“Contact Handled Packages” means TRUPACT-II, HalfPACT, and TRUPACT-III shipping containers and their contents.

#### 1.5.9. Remote-Handled Packages

“Remote-Handled Packages” means both CNS 10-160B and RH-TRU 72-B shipping containers and their contents.

#### 1.5.10. Containment Pallet

“Containment pallet” means a device capable of holding a minimum of one 55-gallon drum, or 85-gallon drum, or 100-gallon drum or a standard waste box, or a ten-drum overpack and that has internal containment for up to ten percent of the volume of the containers on the containment pallet.

#### 1.5.11. Waste Characterization

“Waste characterization” or “characterization” means the activities performed by or on behalf of the waste generator/storage sites (**sites**) to obtain information used by the Permittees to satisfy the general waste analysis requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.13(a)). Characterization occurs before waste containers have been certified for disposal at WIPP.

#### 1.5.12. Waste Confirmation

“Waste confirmation” or “confirmation” means the activities performed by the Permittees or the co-Permittee DOE, pursuant to Permit Attachment C7 (TRU Waste Confirmation), to satisfy the requirements specified in Section 310 of Pub. L. 108-447. Confirmation occurs after waste containers have been certified for disposal at WIPP.

#### 1.5.13. Substantial Barrier

“Substantial barrier” means salt or other non-combustible material installed between the waste face and the bulkhead to protect the waste from events such as ground movement or vehicle impacts. The substantial barrier incorporates the chain link and brattice cloth room closure specified in Permit Attachment A2. Substantial barriers were installed in Panels 3, 4, and 6.

#### 1.5.14. Bulkhead

“Bulkhead” means a steel structure, with flexible flashing, that is used to block ventilation as specified in Permit Attachment A2 (Geologic Repository).

#### 1.5.15. Explosion-Isolation Wall

“Explosion-isolation wall” means the 12-foot wall intended as an explosion isolation device that has been constructed to initially close Panels 1, 2, and 5 subsequent to the completion of waste emplacement.

#### 1.5.16. Filled Panel

“Filled panel” means an Underground Hazardous Waste Disposal Unit specified in Permit Part 4 that will no longer receive waste for emplacement.

#### 1.5.17. Internal Container

“Internal container” means a container inside the outermost container examined during radiography or visual examination (VE). Drum liners, liner bags, plastic bags used for contamination control, capillary-type labware, and debris not designed to hold liquid at the time of original waste packaging are not internal containers.

#### 1.5.18. Observable Liquid

“Observable liquid” means liquid that is observable using radiography or VE as specified in Permit Attachment C (Waste Analysis Plan).

#### 1.5.19. Filled Room

“Filled Room” means a room in an Underground Hazardous Waste Disposal Unit as specified in Permit Part 4 that will no longer receive waste for emplacement.

#### 1.5.20. Active Room

“Active Room” means a room in an Underground Hazardous Waste Disposal Unit as specified in Permit Part 4 that contains emplaced TRU waste and is not a filled room.

#### 1.5.21. TRU Mixed Waste RCRA Volume

“TRU Mixed Waste RCRA Volume (**TRU Mixed Waste Volume**)” means the gross internal volume of the outermost disposal container of TRU mixed waste pursuant to waste volumes in this Permit. For purposes of this Permit, all TRU waste is managed as though it were mixed. This volume is tracked and reported by the Permittees relative to the authorized maximum capacities in Permit Part 4, Table 4.1.1.

#### 1.5.22. Land Withdrawal Act TRU Waste Volume

“Land Withdrawal Act TRU Waste Volume (**LWA TRU Waste Volume**)” means the volume of TRU waste inside a disposal container. This volume is tracked and reported by the DOE internally relative to the WIPP Land Withdrawal Act total capacity limit of 6.2 million ft<sup>3</sup> (175,564 m<sup>3</sup>) (Pub. L. 102-579, as amended). For informational purposes, the LWA TRU Waste Volume is included in Table 4.1.1.

### 1.6. EFFECT OF INACCURACIES IN PERMIT APPLICATION

This Permit is based on the assumption that all information contained in the permit application and the administrative record is accurate and that the Facility will be constructed and operated as specified in the application. The permit application consists of information submitted in September 2009 and supplementary technical documents.

Any inaccuracies found in the submitted information may be grounds for the termination or modification of this Permit in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.41, §270.42, and §270.43) and for potential enforcement action.

### 1.7. DUTIES AND REQUIREMENTS

#### 1.7.1. Duty to Comply

The Permittees shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized in an emergency permit specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.61). Any Permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and/or HWA and is grounds for enforcement action; for Permit modification, suspension, or revocation; or for denial of a Permit modification or renewal application. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(a))]

#### 1.7.2. Permit Term

This Permit shall be effective for a fixed term not to exceed ten years from the effective date. The effective date of this Permit shall be 30 days after notice of the Secretary’s decision has been served on the Permittees or such later time as the Secretary may specify. [20.4.1.900 NMAC (incorporating 40 CFR §270.50(a))]

### 1.7.3. Duty to Reapply

If the Permittees wish to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittees shall apply for and obtain a new Permit. The Permittees shall submit an application for a new Permit at least 180 calendar days before the expiration date of this Permit. [20.4.1.900 NMAC (incorporating 40 CFR §§270.10(h), 270.30(b))]

### 1.7.4. Continuation of Expiring Permits

If the Permittees have submitted a timely and complete application for renewal of this Permit as specified in 20.4.1.900 NMAC (incorporating 40 CFR §§270.10, 270.13 through 270.29), this Permit shall remain in effect until the effective date of the new Permit if, through no fault of the Permittees, the Secretary has not issued a new Permit on or before the expiration date of this Permit. [20.4.1.900 NMAC (incorporating 40 CFR §270.51)]

### 1.7.5. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittees in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(c))]

### 1.7.6. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittees shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(d))]

### 1.7.7. Proper Operation and Maintenance

The Permittees shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittees to achieve compliance with the conditions of this Permit. Proper operation and maintenance shall include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(e))]

#### 1.7.7.1 Safe Transport of TRU Mixed Waste

It is a violation of this Permit if the DOE or the DOE contractor fail to safely transport TRU mixed waste to the WIPP facility. The NMED is requiring compliance with applicable requirements of the WIPP Transportation Plan Implementation Guide and any transportation plans under the authority of the Western Interstate Energy Board's High-Level Radioactive Waste Committee.

#### 1.7.8. Duty to Provide Information

The Permittees shall furnish to the Secretary, within a reasonable time frame as specified by the Secretary, any relevant information which the Secretary may request to determine whether cause exists for modifying, suspending, or revoking this Permit, or to determine compliance with this Permit. The Permittees shall also furnish to the Secretary, upon request, copies of records required to be kept by this Permit. Information and records requested by the Secretary pursuant to this condition shall be provided in a paper or an electronic format acceptable to the Secretary. [20.4.1.500 and .900 NMAC (incorporating 40 CFR §§264.74(a) and 270.30(h))]

#### 1.7.9. Inspection and Entry

The Permittees shall allow the Secretary, or authorized representatives, upon the presentation of credentials and other documents as may be required by law and at reasonable times, the following inspection and entry privileges specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.30(i)):

##### 1.7.9.1. Entrance to Premises

To enter upon the Permittees' premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;

##### 1.7.9.2. Access to Records

To have access to and copy any records that must be kept under the conditions of this Permit;

##### 1.7.9.3. Inspection

To have access to, inspect, and obtain photographs of any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

##### 1.7.9.4. Sampling

To sample or monitor, for the purposes of assuring Permit compliance or as otherwise authorized by RCRA and/or HWA, any substances or parameters at any location. If the Secretary obtains any sample, prior to leaving the premises the Secretary shall give the Permittees a receipt describing the sample obtained and, if requested, a portion of each sample of equal weight or volume to the portion retained. If any analysis is made of the sample, the Secretary shall promptly furnish a copy of the results of the analysis to the Permittees.



Permit Section 1.7.9 shall not be construed to limit, in any manner, the Secretary's authority under Section 74-4-4.3 of the HWA.

#### 1.7.10. Monitoring and Records

##### 1.7.10.1. Representative Sampling

For the purposes of monitoring, the Permittees shall take samples and measurements representative of the monitored activity. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(j)(1))]

##### 1.7.10.2. Record Retention

Beginning with the effective date of this Permit, the Permittees shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports and records required by this Permit until closure. If original strip chart recordings are more than three years old, copies are acceptable. The Permittees shall retain the waste minimization certification required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)), and records of all data used to complete the application for this Permit for a period of at least 3 years from the date of certification or application. The Secretary may extend these periods at any time, and these periods shall be automatically extended during the course of any unresolved enforcement action regarding this facility. The Permittees shall maintain records from all ground-water monitoring wells and associated ground-water surface elevations, during the active life of the facility and the post-closure period. [20.4.1.500 NMAC (incorporating 40 CFR §264.74(b)), 20.4.1.501 NMAC, and 20.4.1.900 (incorporating §270.30(j)(2))]

##### 1.7.10.3. Monitoring Records Contents

As specified by 20.4.1.900 NMAC (incorporating 40 CFR §270.30(j)(3)), records of monitoring information shall include:

- i. The dates, exact place, and times of sampling or measurements;
- ii. The names of individuals who performed the sampling or measurements;
- iii. The dates analyses were performed;
- iv. The names of individuals who performed the analyses;
- v. The names of analytical techniques or methods used; and



- vi. The results of such analyses.

### 1.7.11. Reporting Requirements

#### 1.7.11.1. Reporting Planned Changes

The Permittees shall give notice to the Secretary, as soon as possible, of any planned physical alterations or additions to the permitted facility. The Permittees shall post a link to the planned change notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(1)(1))]

#### 1.7.11.2. Reporting Anticipated Noncompliance

The Permittees shall give advance notice to the Secretary of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The Permittees shall post a link to the planned change notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11. The Permittees shall not store or dispose TRU mixed waste in any modified portion of the facility (except as provided in 20.4.1.900 NMAC (incorporating 40 CFR §270.42)) until the following conditions specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.30(1)(2)) are satisfied:

- i. The Permittees have submitted to the Secretary, by certified mail or hand delivery, a letter signed by the Permittees and a New Mexico registered professional engineer stating that the facility has been constructed or modified in compliance with this Permit, and:
- ii. The Secretary has either inspected the modified portion of the facility and finds it is in compliance with the conditions of this Permit; or waived the inspection or, within 15 calendar days of the date of submission of the letter required above, has not notified the Permittees of his intent to inspect.

### 1.7.12. Transfer of Permits

The Permittees shall not transfer this Permit to any person, unless the Secretary has approved a permit modification request for such transfer in writing. The Secretary shall require modification or revocation and reissuance of this Permit as specified by 20.4.1.900 NMAC (incorporating 40 CFR §§270.40 and 270.41(b)(2)) to identify the new Permittees and incorporate other applicable requirements under the HWA, RCRA, and their implementing regulations. The prospective new Permittee shall file a disclosure statement

with the Secretary, if applicable and as specified at §74-4-4.7 of the HWA, prior to modification or revocation and re-issuance of the Permit.

Before transferring ownership or operation of the facility during its active life or post-closure care period, the Permittees shall notify the new owner or operator in writing as required by 20.4.1.500 and .900 NMAC (incorporating 40 CFR §§264.12(c) and 270.30(l)(3)).

#### 1.7.13. 24 Hour and Subsequent Reporting

##### 1.7.13.1. Oral Report

As required by 20.4.1.900 NMAC (incorporating 40 CFR §270.30(l)(6)(i)), within 24 hours from the time the Permittees become aware of the circumstances, the Permittees shall report orally to the Secretary any noncompliance which may endanger human health or the environment, including:

- i. Information concerning release of any TRU mixed or hazardous waste that may cause an endangerment to public drinking water supplies; and
- ii. Any information of a release or discharge of TRU mixed or hazardous waste, or of a fire or explosion from the facility, which could threaten the environment or human health outside the facility.

The oral report shall be made by calling the Hazardous Waste Bureau's main telephone number during regular business hours, or by calling the New Mexico Department of Public Safety dispatch telephone number during non-business hours, and requesting that the report be forwarded to the NMED spill number.

##### 1.7.13.2. Description of Occurrence

The description of the occurrence and its cause shall include:

- i. Name, address, and telephone number of the Permittees;
- ii. Name, address, and telephone number of the facility;
- iii. Date, time, and type of incident;
- iv. Name and quantity of materials involved;
- v. The extent of injuries, if any;

- vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
- vii. Estimated quantity and disposition of recovered material that resulted from the incident. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(1)(6)(ii))]

#### 1.7.13.3. Written Notice

As required by 20.4.1.900 NMAC (incorporating 40 CFR §270.30(1)(6)(iii)), the Permittees shall submit a written notice within five calendar days of the time the Permittees become aware of the circumstances. The written notice shall contain the information required in Permit Section 1.7.13.2 and the following information:

- i. A description of the noncompliance and its cause;
- ii. The period(s) of the noncompliance including exact dates and times and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
- iii. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

The Secretary may waive the five-day written notice requirement in favor of a written report within 15 calendar days if justifiable cause is provided in advance. The Permittees shall post a link to the written notice or report transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

#### 1.7.13.4. Contingency Plan Implementation

If the Contingency Plan is implemented, the Permittees shall comply with the reporting requirements specified in Permit Attachment D (RCRA Contingency Plan). [20.4.1.500 NMAC (incorporating 40 CFR §264.56(i))]

#### 1.7.14. Other Noncompliance

The Permittees shall report to the Secretary all other instances of noncompliance not otherwise required to be reported above, in Permit Sections 1.7.10 through 1.7.13, at the time monitoring reports are submitted annually in October. The reports shall contain the information specified in Permit Section 1.7.13 and 20.4.1.900 NMAC (incorporating 40 CFR §270.30(1)(10)).

#### 1.7.15. Other Information

Whenever the Permittees become aware that they failed to submit any relevant facts in the Permit application, or submitted incorrect information in the Permit application or in any report to the Secretary, the Permittees shall promptly submit such facts or information in writing to the Secretary. The Permittees shall post a link to the transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(1)(11))]

#### 1.8. ADMISSIBILITY OF DATA

The Permittees waive any objection to the admissibility as evidence of any data required by this Permit in any administrative or judicial action to enforce a condition of this Permit.

#### 1.9. SIGNATORY REQUIREMENT

The Permittees shall sign and certify, as specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.11) all applications, reports required by this Permit, or information submitted to or requested by the Secretary. [20.4.1.900 NMAC (incorporating 40 CFR §270.30(k))]

#### 1.10. SUBMITTAL OF REPORTS, NOTIFICATIONS, AND INFORMATION TO THE SECRETARY

##### 1.10.1. Information Submittal

The Permittees shall submit, by certified mail or hand delivery or by electronic transmittal with a subsequent hard copy, all reports, notifications, or other submissions which are submitted to or requested by the Secretary or required by this Permit, to:

Chief, Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505

Telephone Number: (505) 476-6000  
Facsimile Number: (505) 476-6030

##### 1.10.2. Approval of Submittals

All documents prepared by the Permittees under the terms of this Permit and submitted to the Secretary that are subject to the provisions of 20.4.2 NMAC shall be subject to the procedures set forth therein. Documents requiring the Secretary's approval that are not subject to the provisions of 20.4.2 NMAC may be reviewed and approved, approved with modifications or directions, disapproved, denied, or rejected by the Secretary.

Submittals and associated schedules, upon the Secretary's written approval, shall become enforceable as part of this Permit in accordance with the terms of the Secretary's written

approval, and such documents, as approved, shall control over any contrary or conflicting requirements of this Permit. This provision does not affect any public process that is otherwise required by this Permit, the HWA, or its implementing regulations, including 40 CFR §270.42 and 20.4.1.901 NMAC.

#### 1.10.3. Extension of Time

The Permittees may seek an extension of time in which to perform a requirement of this Permit, for good cause, by sending a written request for extension of time and proposed revised schedule to the Secretary. The request shall state the length of the requested extension and describe the basis for the request. The Secretary will respond in writing to any request for extension following receipt of the request. If the Secretary denies the request for extension, reasons for the denial will be stated.

#### 1.11. PUBLIC E-MAIL NOTIFICATION LIST

The Permittees shall develop and maintain an e-mail list to notify members of the public concerning actions identified in this Permit requiring e-mail notification. The Permittees shall send e-mail notifications required by this Permit to the e-mail list within seven days of the submittal date to the Secretary and shall include in the e-mail a direct link to the specific document to which it relates. The Permittees shall provide a link on the WIPP Home Page <<http://www.wipp.energy.gov>> whereby members of the public may review the actions requiring e-mail notification and submit a request to be placed on this list.

#### 1.12. CONFIDENTIAL INFORMATION

The Permittees may claim confidentiality for any information submitted to or requested by the Secretary or required by this Permit. Any such claim must be asserted at the time of submittal in the manner prescribed on the application form, or in the case of other submittals, by stamping the words “confidential business information” on each page containing such information. If no claim is made, the Secretary may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 CFR Part 2 (Public Information), to the extent authorized by Section 74-4-4.3(D) and (F) of the HWA and 20.4.1.100 and .900 NMAC (incorporating 40 CFR §260.2 and §270.12).

#### 1.13. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittees shall comply with the recordkeeping and reporting requirements specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.73(a)) and elsewhere in this Permit.

The Permittees shall maintain at the facility, until closed as specified in Part 6, the following documents and all amendments, revisions and modifications to these documents:

1. Waste Analysis Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.13(b)) and this Permit, and records and results of waste analyses performed as specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.13).

2. Inspection schedules, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(2)) and this Permit, and records and results of inspections as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15(d)).
3. Personnel training documents and records, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d)) and this Permit.
4. Contingency Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a)) and this Permit, including summary reports and details of all incidents that require implementation of the contingency plan as specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i)).
5. Operating record, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73) and this Permit.
6. Closure Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.112(a)) and this Permit.
7. Post-Closure Plan as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.118(a)) and this Permit.
8. Procedures for limiting air emissions, as required by 20.4.1.500 and .900 NMAC (incorporating 40 CFR §§264.601(c) and 270.23(a)(2)) and this Permit.
9. All other documents required by Part 1, Permit Section 1.7.10, and Part 2.

#### 1.14. INFORMATION REPOSITORY

##### 1.14.1. Requirement for Information Repository

The Permittees shall establish and maintain an electronic Information Repository (**IR**) in accordance with the requirements of 20.4.1.1102 NMAC (incorporating 40 CFR §§124.33(c) through (f)) and 20.4.1.900 NMAC (incorporating 40 CFR §270.30(m)). The documents contained in the IR shall be accessible to the public from the WIPP Home Page.

The Permittees shall establish the IR no later than the effective date of this Permit.

##### 1.14.2. Contents of Information Repository

The Permittees shall ensure that the IR contains the following documents:

1. The Permittees' Part A and Part B Permit Applications associated with the permit renewal;
2. A complete copy of this Permit, as it may be modified;
3. Permit modifications at the request of the Permittees (i.e., Class 1, Class 1\*, Class 2, Class 3, requests for determination of class) and temporary

authorization requests associated with this Permit submitted pursuant to 20.4.1. 900 NMAC (incorporating 40 CFR §270.42) and any associated withdrawals by the Permittees and responses from the Secretary;

4. The Waste Minimization Report submitted pursuant to Permit Section 2.4;
5. Requests for extensions of time submitted pursuant to Permit Section 1.10.3;
6. Corrective action documents submitted pursuant to Permit Part 8;
7. Each report submitted pursuant to Permit Sections 1.7.11 and 1.7.13 if such report is required to be submitted in writing;
8. Notices of deficiency or disapproval (**NODs**), NOD responses, final approval letters, and directives from the Secretary associated with the documents identified in paragraphs 1, 3, and 6 above;
9. Notices of violation, administrative compliance orders, responses to these documents required by the Secretary, and directives from the Secretary associated with the Permit;
10. Biennial Report submitted pursuant to Permit Section 2.14.2.

#### 1.14.3. Index of Information Repository

The Permittees shall ensure that the IR includes an index of the documents contained in the IR identifying all document titles, publications dates, and authors. This index shall be accessible on the internet through the WIPP Home Page. The Permittees shall ensure that all documents are searchable and printable.

The Permittees shall add new documents to the IR within ten days after the new documents are submitted to, or received from, the Secretary.

#### 1.14.4. Notification to Public of Information Repository

The Permittees shall inform the public of the existence of the IR and how it may be accessed by the following methods:

1. Written notice to all individuals on the facility mailing list 30 days after the IR becomes operational;
2. Public notice in area newspapers, including the Carlsbad Current-Argus, Albuquerque Journal, and Santa Fe New Mexican, when the IR becomes operational;
3. Continuous notice on the WIPP Home Page of the existence of the IR; and

4. In the public notice related to any permit modification notification or request submitted by the Permittees, including permit renewals.

## 1.15. COMMUNITY RELATIONS PLAN

### 1.15.1. Requirement for Community Relations Plan

The Permittees shall establish and implement a Community Relations Plan (**CRP**) to describe how the Permittees will keep communities and interested members of the public informed of Permit-related activities, including waste management, closure, post-closure, and corrective action, as specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.32(b)(2)). The CRP shall explain how communities and interested members of the public can participate in Permit-related activities.

The Permittees shall implement and post the CRP on the WIPP Home Page within 180 days of the effective date of this Permit. The Permittees shall maintain the CRP until the termination of this Permit.

### 1.15.2. Contents of Community Relations Plan

The CRP must describe how the Permittees will accomplish the following elements:

1. Identify and establish an open working relationship with communities and interested members of the public;
2. Establish a productive government-to-government relationship between the Permittee DOE and affected tribes and pueblos;
3. Keep communities and interested members of the public informed of permit actions of interest (e.g., implementation of the Contingency Plan, Permit modification requests, Permit compliance issues), to include pre-submittal meetings for Class 2 and 3 permit modification requests;
4. Minimize disputes and resolve differences with communities and interested members of the public;
5. Provide a mechanism for the timely dissemination of information in response to individual requests; and
6. Provide a mechanism for communities and interested members of the public to provide feedback and input to the Permittees.
7. The Permittees shall conduct WIPP Community Forum and Open House quarterly public meetings with interested stakeholders, communities, and members of the public. Specifically, the Permittees must invite the members of the New Mexico Radioactive Waste Consultation Task Force to each



quarterly meeting. The Permittees shall provide evidence of at least 30 days' public notice prior to the quarterly meeting taking place.

#### 1.15.3. Government to Government Consultation

DOE shall consult on a government-to-government basis with affected tribes and pueblos in New Mexico when developing the CRP in an effort to ensure the program is responsive to their needs. DOE shall document in the operating record of this Permit and post on the WIPP Home Page all consultations, communications, agreements, and disagreements between DOE and affected tribes and pueblos in New Mexico only with the express approval of those entities, regarding the development of the CRP. The CRP shall specify how DOE will consult on a government-to-government basis with affected tribes and pueblos annually concerning how they may be made better informed of the issues related to this Permit.

#### 1.15.4. Initial Consultation on Community Relations Plan

The Permittees shall communicate with and solicit comments from communities and interested members of the public when developing the CRP in an effort to ensure the program is responsive to their needs. The Permittees shall document in the operating record of this Permit all consultations, communications, agreements, and disagreements between the Permittees and all participating entities, with the approval of those entities, regarding the development of the CRP.

#### 1.15.5. Annual Compilation of Comments on Community Relations Plan

The CRP shall specify how the Permittees will solicit comments from communities and interested members of the public annually concerning how they may be made better informed of the issues related to this Permit. The CRP shall specify that the Permittees will annually post on the WIPP Home Page a compilation of all such comments, including any statements of disagreement, with the approval of those entities in a manner set forth in the CRP.

### 1.16. DISPUTE RESOLUTION

#### 1.16.1. Applicability

In the event DOE disagrees, in whole or in part, with either an action on a final audit report by NMED (as specified in Permit Section 2.3.2.4) or an evaluation by NMED of DOE's provisional approval of an AK Sufficiency Determination Request for a particular waste stream (as specified in Permit Attachment C), DOE may seek dispute resolution. The dispute resolution procedure in this Permit Section shall be the exclusive mechanism for resolving disputes related to NMED's final audit report action or a determination that DOE's provisional approval for a particular waste stream is inadequate.

#### 1.16.2. Notice to NMED

To invoke dispute resolution, DOE shall notify NMED in writing within seven calendar days of receipt of the action or determination in dispute. Such notice shall be sent to the Hazardous Waste Bureau Chief and must set forth the specific matters in dispute, the position DOE asserts should be adopted, a detailed explanation for DOE's position, and any other matters considered necessary for the dispute resolution. For AK Sufficiency Determination disputes, DOE shall also submit all factual data, analysis, opinion, and other documentation upon which they relied for their provisional approval, and any other information that supports their position. NMED shall acknowledge receipt of notification by e-mail sent to DOE's representative as designated in their written notification.

#### 1.16.3. Tier I - Informal Negotiations

DOE and NMED shall make all reasonable, good faith efforts to informally resolve disputes related to NMED's determination. DOE and NMED shall meet or teleconference within 15 calendar days from NMED's receipt of notice to commence negotiations to resolve the dispute. DOE and NMED shall have 30 calendar days from NMED's receipt of notice to resolve the dispute. If an agreement is reached, NMED shall promptly inform DOE of the terms of the agreement in writing. DOE shall comply with the terms of such agreement or, if appropriate, submit a revised submittal and implement the same in accordance with such agreement. If an agreement is not reached, NMED shall promptly inform DOE in writing that an agreement has not been reached.

#### 1.16.4. Tier II - Final Decision of the Secretary

In the event agreement is not reached within the 30-calendar day period, DOE may submit a written Request for Final Decision to the Secretary. The Request must be submitted within seven calendar days after receipt of notification from NMED that an agreement under Tier I was not reached. The Secretary will notify the Permittees in writing of the decision on the dispute, and the Permittees shall comply with the terms and conditions of the decision. Such decision shall be the final resolution of the dispute and shall be enforceable under this Permit.

#### 1.16.5. Actions Not Affected by Dispute

With the exception of those matters under dispute, the Permittees shall proceed to take any action required by those portions of the submission and of this Permit that NMED determines are not affected by the dispute.

#### 1.16.6. E-Mail Notifications

If DOE submits a notice to NMED pursuant to Permit Section 1.16.2, the Permittees shall post a link to the notice on the WIPP Home Page, and inform those on the e-mail notification list as specified in Permit Section 1.11. After receipt of NMED's letter concerning the conclusion of any Tier I negotiations, the Permittees shall post a link to the NMED letter on the WIPP Home Page, and shall inform those on the e-mail notification list

as specified in Permit Section 1.11. If a Tier I agreement is not reached and DOE submits a Tier II request for final decision to the Secretary, the Permittees shall post a link to the request on the WIPP Home Page, and shall inform those on the e-mail notification list as specified in Permit Section 1.11. After receiving notice of the final action by the Secretary, the Permittees shall post a link to the final action on the WIPP Home Page and shall inform those on the e-mail notification list as specified in Permit Section 1.11.

## PERMIT ATTACHMENTS

~~Permit Attachment A2 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Geologic Repository” Appendix M2).~~

~~Permit Attachment C (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Waste Analysis Plan” Chapter B).~~

~~Permit Attachment C7 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Permittee Level TRU Waste Confirmation Processes” Appendix B7).~~

~~Permit Attachment D (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “RCRA Contingency Plan” Chapter F).~~

~~Permit Attachment G1, “WIPP Panel Closure Design Description and Specifications.”~~

**PART 2 - GENERAL FACILITY CONDITIONS**

## **PART 2 - GENERAL FACILITY CONDITIONS**

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## **PART 2 - GENERAL FACILITY CONDITIONS**

### 2.1. DESIGN AND OPERATION OF FACILITY

The Permittees shall design, construct, maintain, and operate WIPP to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of transuranic (TRU) mixed waste or mixed waste constituents to air, soil, groundwater, or surface water which could threaten human health or the environment, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.31).

### 2.2. WASTE SOURCES

#### 2.2.1. Off-site Wastes

The Permittees may receive off-site TRU mixed waste in compliance with the requirements and conditions specified in this Permit. The Permittees may only receive TRU mixed waste from those sites which comply with the applicable requirements of the Waste Analysis Plan (WAP) specified in Permit Section 2.3.1 and Permit Attachment C, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.13(a)) and as verified through the Audit and Surveillance Program specified in Permit Section 2.3.2.

#### 2.2.2. Required Notification to Off-Site Sources

Before the Permittees receive TRU mixed waste from an off-site source for the first time, they shall inform the generator/storage site in writing that they have the appropriate Permits for, and will accept, the waste the generator/storage site is shipping. The Permittees shall keep a copy of this written notice as part of the operating record, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.12(b)).

### 2.3. GENERAL WASTE ANALYSIS

#### 2.3.1. Waste Analysis Plan

The Permittees shall not manage, store, or dispose TRU mixed waste at WIPP which fails to meet the characterization requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.13), as specified by this Permit.

The Permittees' WAP, as specified in Permit Attachment C, is approved subject to the following conditions:

##### 2.3.1.1. Implementation of Requirements

- i. The Permittees shall require that generator/storage sites implement applicable waste characterization requirements of the WAP, specified in Permit Attachment C, prior to the Permittees' receipt of TRU mixed waste at WIPP.



- ii. The Permittees or the co-Permittee DOE shall implement applicable waste confirmation requirements of the WAP, pursuant to Permit Attachment C7 (TRU Waste Confirmation), prior to shipment of TRU mixed waste from generator/storage sites to WIPP.

#### 2.3.1.2. Waste Characterization Testing Methods

The Permittees shall require that generator/storage sites comply with the applicable method requirements, quality control, equipment testing, inspection, maintenance, and equipment calibration and frequency standards for the procedures specified in Permit Attachment C1 (Waste Characterization Testing Methods).

#### 2.3.1.3. Waste Sampling and Analysis Methods

If, at any time prior to shipment of a new waste stream or at the time of review of a revised waste stream profile form, the Secretary or Permittees identify a discrepancy regarding the assignment of hazardous waste numbers not authorized in Permit Table 2.3.4, the Permittees shall require the generator/storage site to perform additional evaluation/characterization of the waste stream that may include chemical sampling and analysis of the waste.

If the Secretary or Permittees determine that additional characterization is necessary using chemical sampling and analysis, the Permittees shall direct the generator/storage site to provide the Permittees with the following documentation:

- a) Sampling and analysis plan
- b) EPA SW-846 test method(s), or functionally equivalent test method(s), to be used
- c) Identification of the laboratory(ies) that will be performing the test(s)

Upon request by the Secretary, the Permittees shall provide such documentation within 30 days after receipt from the generator.

Upon the Permittees written approval of the sampling and analysis plan, the generator/storage shall implement the sampling and analysis plan and modify the WSPF as appropriate. The Permittees shall provide copies of the approved plan and the results of all analyses to the NMED per Permit Attachment C, Section C-5a.

#### 2.3.1.4. Quality Assurance Objectives

The Permittees shall require that all waste characterization activities used by generator/storage sites comply with the appropriate quality assurance objectives (**QAOs**) specified in Permit Attachment C3 (Quality Assurance Objectives and Data Validation Techniques for Waste Characterization Methods). The Permittees shall require generator/storage sites to review, validate, and verify all testing data; reconcile testing results with data quality objectives (**DQOs**); satisfy data reporting requirements; and identify, document, and report all nonconformances and operational variances in compliance with Permit Attachment C3.

#### 2.3.1.5. Acceptable Knowledge

The Permittees shall require generator/storage sites to assemble acceptable knowledge documentation and re-evaluate acceptable knowledge determinations, and shall audit (as specified in Permit Section 2.3.2) all aspects of the acceptable knowledge waste characterization process as specified in Permit Attachment C4 (TRU Mixed Waste Characterization Using Acceptable Knowledge).

#### 2.3.1.6. Quality Assurance

The Permittees shall require each generator/storage site to develop and implement a quality assurance project plan (**QAPjP**) which demonstrates compliance with, and implementation of, applicable requirements of the WAP, Permit Attachment C, as specified in Permit Attachment C5 (Quality Assurance Project Plan Requirements).

#### 2.3.1.7. WIPP Waste Information System (WWIS) Database

The Permittees shall provide the Secretary access to the WWIS database as necessary to determine compliance with the WAP. The WWIS shall meet all requirements presented in Section C-5a(1) of the WAP, Permit Attachment C, prior to acceptance of TRU mixed waste. The Secretary's access to the WWIS shall be direct, read-only (via modem or Internet) to all query and reporting functions of the Characterization, Certification, Shipping, and Inventory modules of the WWIS database.

Beginning on December 31, 2005, the Permittees instituted a public database containing certain information from the WWIS. The Permittees shall continue to provide such public access through the WIPP Home Page at <<http://www.wipp.energy.gov>>.

### 2.3.2. Audit and Surveillance Program

The Permittees shall not manage, store, or dispose TRU mixed waste at WIPP from a generator/storage site until the following conditions have been met as necessary for the Secretary to determine that the applicable characterization requirements of Permit Section 2.3.1 have been implemented:

#### 2.3.2.1. Requirement to Audit

DOE shall demonstrate to the Secretary that the generator/storage sites have implemented and comply with applicable requirements of the WAP by conducting audits as specified in Permit Attachment C, Section C-5a(3), and Permit Attachment C6 (Audit and Surveillance Program), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.13).

#### 2.3.2.2. Observation of Audit

The Secretary may observe such audits as necessary to validate the implementation of and compliance with applicable WAP requirements at each generator/storage site. The NMED will be invited to the daily audit team caucus as observers. The NMED will be invited to observe biennial Generator Site Technical Reviews (GSTRs). DOE shall provide the Secretary with a current audit schedule on a monthly basis and notify the Secretary no later than 30 calendar days prior to each audit and GSTR.

#### 2.3.2.3. Final Audit Report

DOE shall provide the Secretary a final audit report as specified in Permit Attachment C6, and post a link to the final audit report transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11. The final audit report shall include all information specified in Permit Attachment C6, Section C6-4, and:

- i. A detailed description of all corrective actions and the resolution of any corrective action applicable to WAP requirements, including re-audits and GSTRs if required applicable;
- ii. All documentation necessary for the Secretary to determine if the corrective action was resolved.

#### 2.3.2.4. Secretary Notification of Approval

The Secretary shall approve DOE's final audit report by written notification to DOE that the applicable characterization requirements of the WAP at a generator/storage site and have been implemented.

### 2.3.3. Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (TSDF-WAC)

The Permittees shall not accept TRU mixed wastes at WIPP for storage, management, or disposal which fail to meet the treatment, storage, and disposal facility waste acceptance criteria as presented in Permit Sections 2.3.3.1 through 2.3.3.10 of this Permit.

#### 2.3.3.1. Liquid

Liquid waste is not acceptable at WIPP. Liquid in the quantities delineated below is acceptable.

- Observable liquid shall be no more than 1 percent by volume of the outermost container at the time of radiography or visual examination.
- Internal containers with more than 60 milliliters or 3 percent by volume observable liquid, whichever is greater, are prohibited.
- Containers with Hazardous Waste Number U134 (hydrofluoric acid) assigned shall have no observable liquid.
- Overpacking the outermost container that was examined during radiography or visual examination or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits.

#### 2.3.3.2. Pyrophoric Materials

Non-radionuclide pyrophoric materials, such as elemental potassium, are not acceptable at WIPP.

#### 2.3.3.3. Non-mixed Hazardous Wastes

Hazardous wastes not occurring as co-contaminants with TRU wastes (non-mixed hazardous wastes) are not acceptable at WIPP.

#### 2.3.3.4. Chemical Incompatibility

Wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes are not acceptable at WIPP.

#### 2.3.3.5. Explosives and Compressed Gases

Wastes containing explosives or compressed gases are not acceptable at WIPP.

2.3.3.6. PCB Waste

Wastes with polychlorinated biphenyls (**PCBs**) not authorized under an EPA PCB waste disposal authorization are not acceptable at WIPP.

2.3.3.7. Ignitable, Corrosive, and Reactive Wastes

Wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003) are not acceptable at WIPP.

2.3.3.8. Excluded Waste

TRU mixed waste that has ever been managed as high-level waste and waste from tanks specified in Permit Attachment C are not acceptable at WIPP unless specifically approved through a Class 3 permit modification. Such wastes are listed in Table 2.3.3.8 below.

<b>Table 2.3.3.8 - Additional Approved Waste Streams</b>	
<b>Date Class 3 Permit Modification Request Approved</b>	<b>Description of Waste Stream</b>

2.3.3.9. Unconfirmed Waste

Any waste container that has not been subject to confirmation pursuant to Permit Attachment C7 is not acceptable at WIPP. This prohibition shall not apply to waste containers accepted before confirmation activities were required by this Permit.

2.3.3.10. Waste Stream Profiles

Any waste container from a waste stream which has not been preceded by an appropriate, certified Waste Stream Profile Form (Attachment C, Figure C-1) is not acceptable at WIPP.

2.3.4. Permitted TRU Mixed Wastes

The Permittees shall accept containers which contain only those TRU mixed wastes listed in Permit Attachment B (Hazardous Waste Permit Application Part A). Allowable TRU mixed wastes are specified in Table 2.3.4 below. Some of the waste may also be identified by

unique state hazardous waste codes. These wastes are acceptable at WIPP as long as the TSDF-WAC are met:

<b>Table 2.3.4 – Permitted TRU Mixed Wastes</b>		
<b>EPA Hazardous Waste Number</b>	<b>Hazardous Waste<sup>1</sup></b>	<b>Chemical Abstracts Service (CAS) Registry Number</b>
F001	<u>Spent halogenated solvents:</u> Tetrachloroethylene Trichloroethylene Methylene chloride 1,1,1-Trichloroethane Carbon tetrachloride Chlorinated fluorocarbons	127-18-4 79-01-6 75-09-2 71-55-6 56-23-5 NA
F002	<u>Spent halogenated solvents:</u> Tetrachloroethylene Methylene chloride Trichloroethylene 1,1,1-Trichloroethane Chlorobenzene 1,1,2-Trichloro-1,2,2-trifluoroethane Ortho-dichlorobenzene Trichlorofluoromethane 1,1,2-Trichloroethane	127-18-4 75-09-2 79-01-6 71-55-6 108-90-7 76-13-1 95-50-1 75-69-4 79-00-5
F003	<u>Spent non-halogenated solvents:</u> Xylene Acetone Ethyl acetate Ethyl benzene Ethyl ether Methyl isobutyl ketone n-Butyl alcohol Cyclohexanone Methanol	1330-20-7 67-64-1 141-78-6 100-41-4 60-29-7 108-10-1 71-36-3 108-94-1 67-56-1
F004	<u>Spent non-halogenated solvents:</u> Cresols and cresylic acid Nitrobenzene	1319-77-3 98-95-3

<b>Table 2.3.4 – Permitted TRU Mixed Wastes</b>		
<b>EPA Hazardous Waste Number</b>	<b>Hazardous Waste<sup>1</sup></b>	<b>Chemical Abstracts Service (CAS) Registry Number</b>
F005	<u>Spent non-halogenated solvents:</u> Toluene Methyl ethyl ketone Carbon disulfide Isobutanol Pyridine Benzene 2-Ethoxyethanol 2-Nitropropane	108-88-3 78-93-3 75-15-0 78-83-1 110-86-1 71-43-2 110-80-5 79-46-9
F006	<u>Wastewater treatment sludges from electroplating operations:</u> Cadmium Chromium Cyanide Lead Nickel Silver	7440-43-9 7440-47-3 57-12-5 7439-92-1 7440-02-0 7440-22-4
F007	<u>Spent cyanide plating bath solutions from electroplating operations:</u> See F006	
F009	<u>Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process:</u> See F006	
D004	Arsenic	7440-38-2
D005	Barium	7440-39-3
D006	Cadmium	7440-43-9
D007	Chromium	7440-47-3
D008	Lead	7439-92-1
D009	Mercury	7439-97-6
D010	Selenium	7782-49-2
D011	Silver	7440-22-4
D018	Benzene	71-43-2

<b>Table 2.3.4 – Permitted TRU Mixed Wastes</b>		
<b>EPA Hazardous Waste Number</b>	<b>Hazardous Waste<sup>1</sup></b>	<b>Chemical Abstracts Service (CAS) Registry Number</b>
D019	Carbon Tetrachloride	56-23-5
D021	Chlorobenzene	108-90-7
D022	Chloroform	67-66-3
D026	Cresol	1319-77-3
D027	1,4-Dichlorobenzene	106-46-7
D028	1,2-Dichloroethane	107-06-2
D029	1,1-Dichloroethylene	75-35-4
D030	2,4-Dinitrotoluene	121-14-2
D032	Hexachlorobenzene	118-74-1
D033	Hexachlorobutadiene	87-68-3
D034	Hexachloroethane	67-72-1
D035	Methyl ethyl ketone	78-93-3
D036	Nitrobenzene	98-95-3
D037	Pentachlorophenol	87-86-5
D038	Pyridine	110-86-1
D039	Tetrachloroethylene	127-18-4
D040	Trichloroethylene	79-01-6
D043	Vinyl chloride	75-01-4
P015	Beryllium powder (H)	7440-41-7
P030	Cyanides (soluble cyanide salts), not otherwise specified (H)	N/A
P098	Potassium Cyanide (H)	151-50-8
P099	Potassium Silver Cyanide (H)	506-61-6
P106	Sodium Cyanide (H)	143-33-9
P120	Vanadium Pentoxide (H)	1314-62-1
U002	Acetone (I)	67-64-1
U003	Acetonitrile (I,T)	75-05-8



<b>Table 2.3.4 – Permitted TRU Mixed Wastes</b>		
<b>EPA Hazardous Waste Number</b>	<b>Hazardous Waste<sup>1</sup></b>	<b>Chemical Abstracts Service (CAS) Registry Number</b>
U019	Benzene (I,T)	71-43-2
U037	Chlorobenzene (T)	108-90-7
U043	Vinyl Chloride (T)	75-01-4
U044	Chloroform (T)	67-66-3
U052	Cresol (T)	1319-77-3
U070	1,2-Dichlorobenzene (T)	95-50-1
U072	1,4-Dichlorobenzene (T)	106-46-7
U078	1,1-Dichloroethylene (T)	75-35-4
U079	1,2-Dichloroethylene (T)	156-60-5
U103	Dimethyl Sulfate (T)	77-78-1
U105	2,4-Dinitrotoluene (T)	121-14-2
U108	1,4-Dioxane (T)	123-91-1
U122	Formaldehyde (T)	50-00-0
U133	Hydrazine (R,T)	302-01-2
U134	Hydrofluoric Acid (C,T)	7664-39-3
U151	Mercury (T)	7439-97-6
U154	Methanol (I)	67-56-1
U159	Methyl Ethyl Ketone (I,T)	78-93-3
U196	Pyridine (T)	110-86-1
U209	1,1,2,2-Tetrachloroethane (T)	79-34-5
U210	Tetrachloroethylene (T)	127-18-4
U220	Toluene (T)	108-88-3
U226	1,1,1-Trichloroethane (T)	71-55-6
U228	Trichloroethylene (T)	79-01-6
U239	Xylene (I,T)	1330-20-7

<sup>1</sup> Designations in parentheses for P- and U-coded wastes reflect the basis for the listing and are as follows:

H - acute toxicity

T - toxicity

- R - reactivity
- I - ignitability
- C - corrosivity

Acceptance of U-coded wastes listed for reactivity, ignitability, or corrosivity characteristics is contingent upon a demonstration that the wastes meet the requirements specified in Permit Section 2.3.3.7.

### 2.3.5. Derived Waste

Any WIPP-generated waste derived from adequately characterized, WIPP-accepted TRU mixed waste generated at an off-site facility (*derived waste*) does not need to be additionally characterized for hazardous waste components if the Permittees use the generator's characterization data and knowledge of the processes at the WIPP facility to identify and characterize derived waste. Derived waste containers shall be managed according to Permit Attachment A1 (Container Storage), Section A1-1d(1), and meet all TSDF waste acceptance criteria in Permit Section 2.3.3 prior to disposal at WIPP.

## 2.4. WASTE MINIMIZATION PROGRAM

The Permittees shall implement and maintain a waste minimization program to reduce the volume and toxicity of hazardous and mixed wastes generated at the facility, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(9)). The waste minimization program shall include proposed, practicable methods of treatment and storage currently available to the Permittees to minimize the present and future threat to human health and the environment. The waste minimization program shall include the following items:

1. Written policies or statements that outline goals, objectives, and methods for source reduction and recycling of hazardous and mixed waste at the facility;
2. Employee training or incentive programs designed to identify and implement source reduction and recycling opportunities for all hazardous and mixed wastes;
3. Source reduction or recycling measures implemented in the last five years or planned for the next federal fiscal year;
4. Estimated dollar amounts of capital expenditures and operating costs devoted to source reduction and recycling of hazardous and mixed waste;
5. Factors which have prevented implementation of source reduction or recycling;
6. Summary of additional waste minimization efforts that could be implemented at the facility that analyzes the potential for reducing the quantity and toxicity of each waste stream through production process changes, production reformulations, recycling, and all other appropriate means including an assessment of the technical feasibility, cost, and potential waste reduction for each option;
7. Flow charts and/or tables summarizing all hazardous and mixed waste streams produced by the facility by quantity, type, building or area, and program; and

8. Demonstration of the need to use those processes which produce a particular hazardous or mixed waste due to a lack of alternative processes, available technology, or available alternative processes that would produce less volume or less toxic waste.

The Permittees shall submit to the Secretary a report regarding progress made in the waste minimization program in the previous year. The report shall address items 1 – 8 above, shall show changes from the previous report, and shall be submitted annually by December 1 for the year ending the previous September 30<sup>th</sup>.

#### 2.5. DUST SUPPRESSION

The Permittees shall not use waste, used oil, or any other material which is contaminated with dioxin, polychlorinated biphenyls (**PCBs**), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment, as specified in 20.4.1.700 NMAC (incorporating 40 CFR §266.23(b)).

#### 2.6. SECURITY

In order to prevent the unknowing entry, and minimize the possibility of unauthorized entry, of persons or livestock onto the active portion of the facility, the Permittees shall comply with the following security provisions, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.14).

##### 2.6.1. 24-Hour Surveillance System

The Permittees shall maintain a 24-hour surveillance system comprised of security officers that provide protection 24 hours per day, every day. Security officers shall continuously monitor and control personnel, vehicle, and material access/egress to the active portion of the facility, known as the Property Protection Area (**PPA**), in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(1)).

During non-operational hours, security officers shall conduct documented security patrols outside of the PPA, at a minimum rate of two per 12-hour shift. Whenever scheduled security patrols cannot be made, the reason for missing the patrol shall be documented in the security logbook.

##### 2.6.2. Barrier

The PPA shall be enclosed by a permanent security barrier consisting of seven ft high chain-link fence, or other material, topped by three strands of barbed wire, for a total height of eight ft. The fence shall completely surround all major surface structures, or connect to structures as part of the barrier, on the active portion of the facility and shall also be inspected as specified in Permit Attachment E to ensure it remains in good repair, in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)(i)).

### 2.6.3. Means to Control Entry

The Permittees shall control entry to the active portion of the facility at all times, in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(b)(2)(ii)). Entry into the PPA, whether by personnel or vehicles, shall be through controlled gates and doors. Only properly identified and authorized persons, vehicles, and property shall be allowed entrance to and exit from the active portion of the facility. Security shall require employees to identify themselves with an identification badge when entering or leaving the premises, and shall require visitors to show proper authorization prior to allowing them to enter the active portion of the facility. Visitors shall be required to wear an approved badge and may require an authorized escort.

For the purposes of entry control to areas where wastes are managed, stored, or disposed, these areas shall be posted as Controlled Areas, and access shall be limited to trained and qualified individuals and visitors escorted by trained and qualified individuals.

### 2.6.4. Warning Signs

The Permittees shall post “No Trespassing” signs and “Danger: Authorized Personnel Only” signs in English and Spanish at approximately 50 ft intervals on the permanent security barrier surrounding the PPA. The signs shall be legible from a distance of 25 ft and shall be visible from any approach to the facility. These same signs, plus security and traffic signs, shall also be located on the controlled gates, in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.14(c)).

## 2.7. GENERAL INSPECTION REQUIREMENTS

### 2.7.1. Inspection Schedule

The Permittees shall implement the inspection schedule specified in Permit Attachment E (Inspection Schedule, Process and Forms) to detect any malfunctions and deteriorations, operator errors, and discharges, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)).

### 2.7.2. Inspection Log Forms

The Permittees shall use the inspection logbooks and forms as specified in Permit Attachment E. Original copies of these completed forms are maintained in the Operating Record. The Permittees shall record the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15(d)).

### 2.7.3. Inspection Frequency

The Permittees shall inspect monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment at the frequency specified in Tables

E-1 and ~~E-1a~~~~E-2~~ of Permit Attachment E, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)).

#### 2.7.4. Inspection Remediation

The Permittees shall remedy any deterioration or malfunction of equipment or structures which an inspection reveals, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15(c)).

#### 2.7.5. Inspection Records

Beginning with the effective date of this Permit, the Permittees shall maintain inspection logbooks and forms in the operating record until closure, as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.15(d) and 264.73(b)(5)).

### 2.8. PERSONNEL TRAINING

The Permittees shall conduct personnel training, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16).

#### 2.8.1. Personnel Training Content

The personnel training program shall include the requirements specified in Permit Attachment F (*Facility Personnel Permit Training Program*) as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16).

#### 2.8.2. Personnel Training Requirements

The Permittees shall train all persons involved in the management of TRU mixed waste in procedures relevant to the positions in which they are employed, as specified in Permit Attachment F (*Facility Personnel Permit Training Program*), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16).

#### 2.8.3. Personnel Training Records

The Permittees shall maintain training documents and records, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d) and (e)). The Permittees may maintain training records required by the terms of this Permit electronically. Unless specifically prohibited by this Permit, an electronic record that cannot be altered by the user and capable of producing a paper copy shall be deemed to be a written record.

#### 2.8.4. Continuing Training

Unless otherwise specified by this Permit, continuing training required by this Permit on an annual or biennial basis shall be completed by the end of the month of the anniversary date when the training was previously completed.

2.9. GENERAL REQUIREMENTS FOR HANDLING IGNITABLE, CORROSIVE, REACTIVE, OR INCOMPATIBLE WASTES

The Permittees shall not manage, store or dispose of ignitable, corrosive, reactive, or incompatible wastes, as defined in 20.4.1.200 NMAC (incorporating 40 CFR §§261.21, 261.22, and 261.23) and 20.4.1.500 NMAC (incorporating 40 CFR §264 Appendix V) within the permitted units. The Permittees shall comply with the procedures to prevent acceptance of ignitable, corrosive, reactive, and incompatible waste specified in Permit Sections 2.3.1 and 2.3.3.

2.10. PREPAREDNESS AND PREVENTION

2.10.1. Required Equipment

The Permittees shall maintain at the facility the equipment specified in the Contingency Plan, Permit Attachment D (RCRA Contingency Plan), as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.32).

2.10.1.1. Internal Communications

The Permittees shall have an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.32(a)). The internal communication systems shall include two-way communication by the public address (PA) system and its intercom phones, mobile phones, mine phones, plant-based radios, and portable two-way radios. The alarm system shall include local and facility-wide alarm systems.

2.10.1.2. External Communications

The Permittees shall have a communications device or system capable of summoning outside agencies for emergency assistance, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.32(b)). The external communication systems shall include mobile phones and two-way radios.

2.10.1.3. Emergency Equipment

The Permittees shall have portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment as described in Permit Attachment D (RCRA Contingency Plan) and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.32(c)).

2.10.1.4. Water for Fire Control

The Permittees shall have water at adequate volume and pressure to supply water-hose streams, foam-producing equipment, automatic sprinklers, or water-spray systems, as required by 20.4.1.500 NMAC

(incorporating 40 CFR §264.32(d)). The WIPP facility water system shall consist of water furnished by the City of Carlsbad capable of providing water at a rate of 6,000 gallons per minute; two water storage tanks, one 180,000-gallon capacity tank for use by the fire-water system and a second tank with a 100,000-gallon reserve; dedicated fire-water pumps rated at 1,500 gallons per minute at 125 pounds per square inch; and a wet-pipe sprinkler system connected to surface buildings as described in Permit Attachment D (RCRA Contingency Plan).

#### 2.10.1.5. Electrical Backup

In case of loss of AC power input to the Uninterrupted Power Supply (UPS) units, the dedicated batteries were designed to supply power to a fully loaded UPS for 30 minutes. It is expected that the AC power input to the UPS will be restored within 30 minutes, either from the off-site electric utility or from the site back-up power generator system.

The remote-handled (RH) Complex is included in the Waste Handling Building (WHB). The Central UPS supplies power to the WHB which includes the RH Complex. The RH Bay, Hot Cell and Transfer Cell equipment are serviced by diesel powered generators. The generators provide backup power to facility functions that include both contact-handled(CH) and RH TRU mixed waste handling operations. The RH TRU mixed waste handling equipment is designed to stop as a result of loss of power in a fail-safe condition. Power from the back-up generators may be utilized to place RH TRU mixed waste containers in process into a safe configuration. During a total power outage condition selected RH TRU mixed waste loads can be powered by the Central UPS. Within a short time, selected RH TRU mixed waste loads can be powered by the Backup Diesel Generators. The backup central UPS for the WHB would also supply backup power to the RH Complex.

Human health and the environment are protected during a loss of off-site power by a combination of factors:

- i. The underground ventilation filtration system operates as designed so that no releases of contaminated particulates will occur
- ii. The UPS maintains monitoring systems and alarms in waste handling areas so that fires or pressure loss will be detected and an appropriate response initiated
- iii. Generators are brought on line within 30 minutes, at which time hoisting can be initiated so that personnel do not have to stay underground for extended lengths of time.

- iv. Decisions to evacuate underground personnel will be made in accordance with the requirements of the Mine Safety and Health Administration (MSHA)
- v. The waste hoist brakes set automatically so that loads do not fall
- vi. Cranes retain their loads so that spills do not occur from dropped containers
- vii. Communication systems are maintained
- viii. The emergency operations center is powered if it is needed

#### 2.10.2. Testing and Maintenance of Equipment

The Permittees shall test and maintain the equipment specified in Permit Section 2.10.1, as necessary, to assure its proper operation in time of emergency, as specified in Permit Attachment E and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.33).

#### 2.10.3. Access to Communications or Alarm System

The Permittees shall maintain access to the communications and alarm systems specified in Permit Section 2.10.1, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.34).

#### 2.10.4. Required Aisle Space

The Permittees shall maintain aisle space in the WHB Unit and Parking Area Unit (Part 3) to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.35).

#### 2.10.5. Arrangements with Local Authorities

##### 2.10.5.1. Parties to Arrangements

The Permittees shall maintain preparedness and prevention arrangements with state and local authorities, other mining operations, contractors, and other governmental agencies specified in Permit Attachment D, Section D-7, as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.37(a) and 264.52(c)). If state or local authorities, other mining operations, contractors, or other governmental agencies decline to enter into preparedness and prevention arrangements with the Permittees, the Permittees shall document this refusal in the operating record, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.37(b)).



#### 2.10.5.2. Coordination Agreements

As specified in Section D-7 of Permit Attachment D, these arrangements shall be agreements between the Permittees and the off-site cooperating agencies, and shall include the elements required by 20.4.1.500 NMAC (incorporating 40 CFR §264.37(a)). Copies and descriptions of these agreements shall be maintained at the facility in the operating record.

#### 2.10.6. Live Fire Extinguisher Training

The Permittees shall develop and implement a Live Fire Extinguisher Training class. The Live Fire Extinguisher Training class will be made available to employees as a preparedness and prevention measure, but is not a mandatory training class for the general employee. It is mandatory for unescorted access in the underground.

### 2.11. HAZARDS PREVENTION

The Permittees shall operate the WIPP facility to fully meet each of the requirements of 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(8)), to prevent hazards associated with unloading operations, prevent runoff from hazardous waste handling areas, prevent contamination of water supplies, mitigate the effects of equipment and power failures, prevent undue exposure of personnel to hazardous waste, and prevent releases to the atmosphere, as specified in Permit Attachments A (General Facility Description and Process Information), A1 (Container Storage), and A2 (Geologic Repository).

### 2.12. CONTINGENCY PLAN

#### 2.12.1. Implementation of Plan

The Permittees shall immediately implement the Contingency Plan as specified in Permit Attachment D whenever there is a fire, explosion, or release of mixed or hazardous waste or hazardous waste constituents which could threaten human health or the environment, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.51(b)).

#### 2.12.2. Copies of Plan

The Permittees shall maintain copies of the Contingency Plan and all revisions and amendments to the Contingency Plan as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.53). The Permittees shall provide copies of the current Contingency Plan to the Secretary and all entities with which the Permittees have agreements with local emergency response agencies, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.53(b)). The Permittees shall maintain at least one current paper copy of the Contingency Plan at the facility in a location readily accessible to the Emergency Coordinator specified in Permit Section 2.12.4.

### 2.12.3. Amendments to Plan

The Permittees shall review and immediately amend, if necessary, the Contingency Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.54).

### 2.12.4. Emergency Coordinator

An Emergency Coordinator as specified in Table D-1 of Permit Attachment D shall be available at all times in case of an emergency. The Emergency Coordinator shall be thoroughly familiar with the Contingency Plan and shall have the authority to commit the resources needed to implement the Contingency Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.55). In the event of an imminent or actual emergency, the Emergency Coordinator shall implement the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.56).

## 2.13. MANIFEST SYSTEM

The Permittees shall comply with the manifest requirements of 20.4.1.500 NMAC (incorporating 40 CFR §§264.71 and 264.72). The Permittees shall not accept for storage or disposal any mixed waste from an off-site source without an accompanying manifest.

## 2.14. RECORDKEEPING AND REPORTING

In addition to the recordkeeping and reporting requirements specified elsewhere in this Permit, the Permittees shall comply with the following conditions:

### 2.14.1. Operating Record

The Permittees shall maintain a written operating record at the facility, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(a)). The written operating record shall include all information required under 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)) subject to the limitations on the storage of classified information as discussed in Permit Attachment C. Unless specifically prohibited by this Permit, an electronic record that cannot be altered by the user and capable of producing a paper copy shall be deemed to be a written record. The Permittees shall maintain the operating record until closure of the facility.

### 2.14.2. Biennial Report

The Permittees shall submit to the Secretary a biennial report, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.75).

### 2.14.3 Repository Siting Annual Report

The Department of Energy (DOE) shall submit an annual report summarizing its progress toward siting another geologic repository for transuranic waste in a state other than New Mexico. The annual report shall summarize the steps the DOE has taken toward siting such

a geologic repository in another state and the report shall include documentation supporting the summary. Such documentation may include: budget appropriation requests; land acquisition(s); state and public engagement activities; feasibility studies; and design, construction, and operation plans.

## PERMIT ATTACHMENTS

~~Permit Attachment A (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “General Facility Description and Process Information” – Chapter A and “Information for Specific Units” – Chapter M)~~

~~Permit Attachment A1 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Container Storage” – Appendix M1)~~

~~Permit Attachment A2 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Geologic Repository” – Appendix M2)~~

~~Permit Attachment B (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Part A Application”)~~

~~Permit Attachment C (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Waste Analysis Plan” – Chapter B)~~

~~Permit Attachment C1 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Waste Characterization Sampling Methods” – Appendix B1)~~

~~Permit Attachment C3 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Quality Assurance Objectives and Data Validation Techniques for Waste Characterization Sampling and Analytical Methods” – Appendix B3)~~

~~Permit Attachment C4 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “TRU Waste Characterization Using Acceptable Knowledge” – Appendix B4)~~

~~Permit Attachment C5 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Quality Assurance Project Plan Requirements” – Appendix B5)~~

~~Permit Attachment C6 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Waste Isolation Pilot Plant DOE Audit and Surveillance Program” – Appendix B6)~~

~~Permit Attachment C7 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Permittee Level TRU Waste Confirmation Processes” – Appendix B7)~~

~~Permit Attachment D (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “RCRA Contingency Plan” – Chapter F)~~

~~Permit Attachment E (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Inspection Schedule, Process and Forms” – Chapter D)~~

~~Permit Attachment F (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Personnel Training” – Chapter H)~~

**PART 3 - CONTAINER STORAGE**

## PART 3 - CONTAINER STORAGE

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## **PART 3 - CONTAINER STORAGE**

### 3.1. DESIGNATED CONTAINER STORAGE UNITS

This Part authorizes the storage and management of transuranic (**TRU**) mixed waste containers in the Waste Handling Building and Parking Area Container Storage Units described below. Specific facility and process information for the storage and management of TRU mixed waste in these Container Storage Units is incorporated in Permit Attachment A1 (Container Storage).

#### 3.1.1. Waste Handling Building Container Storage Unit

The Waste Handling Building Container Storage Unit (**WHB Unit**) is located in the Waste Handling Building (**WHB**) at the WIPP facility. The WHB Unit consists of the WHB contact-handled (**CH**) Bay and the remote-handled (**RH**) Complex. The areas and storage capacities for the WHB unit are defined in Table 3.1.1.

The Permittees may store and manage TRU mixed waste in the WHB Unit, provided the Permittees comply with the following conditions:

##### 3.1.1.1. Storage Containers

The Permittees shall store TRU mixed waste in containers specified in Permit Section 3.3.1.

##### 3.1.1.2. Storage Locations and Quantities

The Permittees may store TRU mixed waste containers in the locations in the WHB Unit, as specified in Table 3.1.1 below and depicted in Permit Attachment M-A1, Figures M-1A1-1 and M-14A1-17a, M-15b, and M-16c. The Permittees may store quantities of TRU mixed waste containers in these locations not to exceed the maximum capacities specified in Table 3.1.1 below.

##### 3.1.1.3. Use of CH Bay Surge Storage

The Permittees may use the CH Bay Surge Storage Area in Table 3.1.1 below only as specified in Permit Attachment A1, Section A1-1c(1).

##### 3.1.1.4. Notification of CH Bay Surge Storage Use

The Permittees shall notify the Secretary in writing upon using the CH Bay Surge Storage Area and provide justification for its use. The Permittees shall post a link to the notice of CH Bay Surge Storage Area use on the WIPP Home Page, and inform those on the e-mail notification list as specified in Permit Section 1.11. The Permittees shall submit a report to the Secretary by October 27 of each year summarizing CH Bay Surge Storage Area usage.



<b>Table 3.1.1 - WHB Unit</b>			
<b>Description</b>	<b>Area</b>	<b>Maximum Capacity</b>	<b>Container Equivalent</b>
CH Bay Storage Area	32,307 ft <sup>2</sup> (3,001 m <sup>2</sup> )	4,800 ft <sup>3</sup> (135.9 m <sup>3</sup> )	13 loaded facility pallets and 4 CH Packages at the TRUDOCKS
CH Bay Surge Storage Area	included in CH Bay Storage Area	1,600 ft <sup>3</sup> (45.3 m <sup>3</sup> )	5 loaded facility pallets
Derived Waste Storage Area	included in CH Bay Storage Area	66.3 ft <sup>3</sup> (1.88 m <sup>3</sup> )	1 Standard Waste Box
<b>Total for CH Waste</b>	32,307 ft <sup>2</sup> (3,001 m <sup>2</sup> )	<b>6,466.3 ft<sup>3</sup></b> <b>183.1 m<sup>3</sup></b>	
RH Bay	12,552 ft <sup>2</sup> (1,166 m <sup>2</sup> )	156 ft <sup>3</sup> (4.4 m <sup>3</sup> )	2 loaded casks and 1 drum of derived waste
Cask Unloading Room	382 ft <sup>2</sup> (36 m <sup>2</sup> )	74 ft <sup>3</sup> (2.1 m <sup>3</sup> )	1 loaded cask
Hot Cell	1,841 ft <sup>2</sup> (171 m <sup>2</sup> )	94.9 ft <sup>3</sup> (2.7 m <sup>3</sup> )	12 drums and 1 drum of derived waste
Transfer Cell	1,003 ft <sup>2</sup> (93 m <sup>2</sup> )	31.4 ft <sup>3</sup> (0.89 m <sup>3</sup> )	1 canister
Facility Cask Loading Room	1,625 ft <sup>2</sup> (151 m <sup>2</sup> )	31.4 ft <sup>3</sup> (0.89 m <sup>3</sup> )	1 canister
<b>Total for RH Waste</b>	<b>17,403 ft<sup>2</sup></b> <b>(1,617 m<sup>2</sup>)</b>	<b>387.7 ft<sup>3</sup></b> <b>(11.0 m<sup>3</sup>)</b>	
<b>Facility Total</b>	<b>49,710 ft<sup>2</sup></b> <b>(4,618 m<sup>2</sup>)</b>	<b>6,854 ft<sup>3</sup></b> <b>(194.1 m<sup>3</sup>)</b>	

3.1.1.5. Storage on Pallets

The Permittees shall store TRU mixed waste containers unloaded from the Contact-Handled Packages (**TRUPACT-II, HalfPACT, or TRUPACT III** shipping containers) on pallets in the WHB Unit, as described in Permit Attachment A1, Section A1-1c(1).

3.1.1.6. Storage of Derived Waste

The Permittees shall store containers of TRU mixed derived waste only in the Derived Waste Storage Area, the RH Bay, and the RH Hot Cell. The

Permittees shall store the derived waste containers on a pallet that provides secondary containment and elevates the containers at least 6 inches above the floor to protect them from contact with accumulated liquid.

3.1.1.7. CH TRU Mixed Waste Storage Time Limit

The Permittees shall not store a CH TRU mixed waste container in the WHB Unit for more than 60 calendar days, with the exception of the Derived Waste Storage Area, where derived waste may be accumulated and stored until the container is full.

3.1.1.8. Minimum Aisle Space

The Permittees shall maintain a minimum aisle space of 44 inches (1.1 m) between facility pallets in the CH Bay of the WHB Unit. The Permittees shall maintain adequate aisle space of 44 inches (1.1 m) between loaded casks in the RH Bay of the WHB Unit. For other locations within the RH Complex, sufficient aisle space will be maintained to assure that emergency equipment can be accessed or moved to the necessary locations.

3.1.1.9. Storage of RH TRU Mixed Waste Containers

The Permittees shall store RH TRU mixed waste in casks, canisters, or drums in the RH Complex as described in Permit Attachment A1, Section A1-1c(1).

3.1.1.10. RH TRU Mixed Waste Storage Time Limit

The Permittees shall not store a RH TRU mixed waste container in the RH Complex for more than 60 calendar days, with the following exceptions:

- i. Derived Waste Storage Areas, where derived waste may be accumulated and stored until the container is full; and
- ii. Hot Cell, where 55-gallon drums may be stored for no more than 25 of the 60 calendar days.

3.1.1.11. Hot Cell RH TRU Mixed Waste Processing Capacity

The processing capacity of the Hot Cell is limited to 13,773 ft<sup>3</sup> (390 m<sup>3</sup>) of RH TRU mixed waste.

### 3.1.2. Parking Area Container Storage Unit

The Parking Area Container Storage Unit (**Parking Area Unit**) is an asphalt and concrete surface extending from north of the rail sidings to the WHB, within the Controlled Area. The Parking Area Unit shall be enclosed by chain link fence. The Parking Area Unit shall comprise a surface area of no more than 137,050 ft<sup>2</sup> (12,730 m<sup>2</sup>), as depicted in Permit Attachment M-A1, Figure M-2A1-2.

The Permittees may store and manage TRU mixed waste in the Parking Area Unit, provided the Permittees comply with the following conditions:

#### 3.1.2.1. Storage Containers

The Permittees shall store TRU mixed waste in containers specified in Permit Section 3.3.1. These TRU mixed waste containers shall be stored within the sealed Contact-Handled or Remote-Handled Packages described in Permit Attachment A1.

#### 3.1.2.2. Storage Locations and Quantities

The Permittees shall store TRU mixed waste containers in any location within the Parking Area Unit, as specified in Table 3.1.2 below. The Permittees may store quantities of TRU mixed waste containers within sealed Contact-Handled or Remote-Handled Packages in these locations not to exceed the maximum capacities specified in Table 3.1.2 below.

#### 3.1.2.3. Use of Parking Area Surge Storage

The Permittees may use the Parking Area Surge Storage in Table 3.1.2 below only when the maximum capacity in the Parking Area is reached and as specified in Permit Attachment A1, Section A1-1c(2).

#### 3.1.2.4. Notification of Parking Area Surge Storage Use

The Permittees shall notify the Secretary in writing upon using the Parking Area Surge Storage and provide justification for its use. The Permittees shall post a link to the notice of Parking Area Surge Storage use on the WIPP Home Page, and inform those on the e-mail notification list as specified in Permit Section 1.11. The Permittees shall submit a report to the Secretary by October 27 of each year summarizing Parking Area Surge Storage usage.

<b>Table 3.1.2 - Parking Area Unit</b>			
<b>Description</b>	<b>Area</b>	<b>Maximum Capacity</b>	<b>Container Equivalent</b>
Parking Area	137,050 ft <sup>2</sup> (12,730 m <sup>2</sup> )	6,734 ft <sup>3</sup> (191 m <sup>3</sup> )	40 Contact-Handled Packages containing waste and 8 Remote-Handled Packages containing waste. The total number of Contact-Handled Packages containing waste in the Parking Area Unit cannot exceed 50.
Parking Area Surge Storage	Included in Parking Area	2,129 ft <sup>3</sup> (60 m <sup>3</sup> )	12 Contact-Handled Packages and 4 Remote-Handled Packages. The total number of Contact-Handled Packages containing waste in the Parking Area Unit cannot exceed 50.

3.1.2.5. Prohibition on Opening Shipping Containers

The Permittees shall keep the Contact-Handled or Remote-Handled Packages sealed at all times while in the Parking Area Unit.

3.1.2.6. Storage Time Limit

The Permittees shall not store sealed Contact-Handled or Remote-Handled Packages in the Parking Area Unit for more than 59 days after the date the Inner Containment Vessel (ICV) of the Package was sealed at the generator site. Prior to storing a sealed Package, the Permittees shall verify that the ICV Closure Date for each Package is recorded in the WIPP Waste Information System (WWIS) database described in Permit Attachment C (Waste Analysis Plan).

3.1.2.7. Minimum Aisle Space

The Permittees shall maintain a minimum spacing of 4 ft (1.2 m) between loaded Contact-Handled or Remote-Handled Packages.

3.2. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

3.2.1. Permitted Waste

The Permittees may store and manage TRU mixed waste in the WHB Unit and Parking Area Unit, provided the Permittees comply with the following conditions:

3.2.1.1. Waste Analysis Plan

The TRU mixed waste shall be characterized to comply with the waste analysis plan specified in Permit Section 2.3.1.

3.2.1.2. TSDF Waste Acceptance Criteria

The TRU mixed waste shall comply with the treatment, storage, and disposal facility (TSDF) waste acceptance criteria specified in Permit Section 2.3.3.

3.2.1.3. Hazardous Waste Numbers

The TRU mixed waste shall contain only hazardous waste numbers specified in Permit Section 2.3.4.

3.2.2. Prohibited Waste

The Permittees shall not store or manage any TRU mixed waste that fails to comply with Permit Section 3.2.1.

3.3. CONDITION OF CONTAINERS

If a container holding TRU mixed waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittees shall manage the TRU mixed waste containers specified in Permit Section 3.3.1 as specified in Permit Attachment A1 and in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.171).

3.3.1. Acceptable Storage Containers

The Permittees shall use containers that comply with the requirements for U.S. Department of Transportation shipping container regulations (49 CFR §173 - Shippers - General Requirements for Shipment and Packaging, and 49 CFR §178 - Specifications for Packaging) for storage of TRU mixed waste at WIPP. The Permittees are prohibited from storing TRU mixed waste in any container not specified in Permit Attachment A1, Section A1-1b, as set forth below:

3.3.1.1. Standard 55-gallon (208-liter) Drum

Each standard 55-gallon drum has a gross internal volume of 7.4 ft<sup>3</sup> (0.21 m<sup>3</sup>).

3.3.1.2. Standard Waste Box (SWB)

Each SWB has a gross internal volume of 66.3 ft<sup>3</sup> (1.88 m<sup>3</sup>).

3.3.1.3. Ten-drum Overpack (TDOP)

Each TDOP has a gross internal volume of 160 ft<sup>3</sup> (4.5 m<sup>3</sup>). TDOPs may be used to contain up to ten standard 55-gallon drums or one SWB. TDOPs may be direct loaded or used to overpack drums or SWBs containing CH TRU mixed waste.

3.3.1.4. 85-gallon (322-liter) Drum

Each 85-gallon drum has a gross internal volume of up to 11.4 ft<sup>3</sup> (0.32 m<sup>3</sup>). 85-gallon drums may be direct loaded or used for overpacking 55-gallon drums containing CH TRU mixed waste and for collecting and storing derived waste.

3.3.1.5. 100-gallon (379-liter) Drum

Each 100-gallon drum has a gross internal volume of 13.4 ft<sup>3</sup> (0.38 m<sup>3</sup>). 100-gallon drums may be direct loaded with CH TRU mixed waste.

3.3.1.6. RH TRU Canister

Each RH TRU canister has a gross internal volume of 31.4 ft<sup>3</sup> (0.89 m<sup>3</sup>). RH TRU canisters contain RH TRU mixed waste packaged in small containers (e.g., 55-gallon drums) or waste loaded directly into the canister.

3.3.1.7. Standard Large Box 2 (SLB2)

Each SLB2 has a gross internal volume of 261 ft<sup>3</sup> (7.39 m<sup>3</sup>). SLB2s may be direct loaded with CH TRU mixed waste.

3.3.1.8. Shielded Container

Each shielded container has a gross internal volume of 7.4 ft<sup>3</sup> (0.21 m<sup>3</sup>). Shielded containers contain RH TRU mixed waste, but shielding will allow it to be managed and stored as CH TRU mixed waste. For the purpose of this Permit, shielded containers will be managed, stored, and disposed as CH TRU mixed waste, but will be counted towards the RH TRU mixed waste volume limits.

3.3.2. Derived Waste Containers

The Permittees shall use standard 55-gallon drums, SWBs, or 85-gallon drums to collect, store, and dispose of derived waste.

### 3.4. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittees shall use containers made of or lined with materials which will not react with, and are otherwise compatible with, the TRU mixed waste to be stored, so that the ability of the container to contain the waste is not impaired, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.172).

### 3.5. MANAGEMENT OF CONTAINERS

The Permittees shall manage all containers as specified in Permit Attachment A1 and shall keep all containers closed during storage, except when it is necessary to add waste to derived waste containers. The Permittees shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.173).

### 3.6. CONTAINMENT SYSTEMS

The Permittees shall maintain the secondary containment systems for all containers managed in the WHB Unit and Parking Area Unit as specified in Permit Attachment A1, Section A1-1f, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.175).

### 3.7. INSPECTION SCHEDULES AND PROCEDURES

The Permittees shall inspect the WHB Unit and Parking Area Unit TRU mixed waste container storage and management areas at least weekly, in accordance with Permit Attachment E (Inspection Schedule, Process and Forms), Tables E-1 and E-1a, and Permit Attachment A1, Section A1-1e, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.174).

#### 3.7.1. Inspection of 55-Gallon Drum Seven-Packs

The Permittees shall not be required to inspect the center drum of a 55-gallon seven-pack assembly, ~~as depicted in Permit Attachment A2 (Geologic Repository), Figure A2-6.~~

#### 3.7.2. Inspection of Sealed Contact-Handled or Remote-Handled Packages

The Permittees shall not be required to inspect the contents of sealed Contact-Handled or Remote-Handled Packages stored in compliance with Permit Section 3.1.2 and Permit Attachment A1, Section A1-1e(2). The Permittees shall ensure a clearly legible marking or label is present on each Contact-Handled and Remote-Handled Package indicating whether the Contact-Handled or Remote-Handled Package contains TRU mixed waste.

### 3.8. RECORDKEEPING

The Permittees shall place the results of waste analyses in the operating record as specified in Permit Section 2.14 and Permit Attachment C.

## PERMIT ATTACHMENTS

~~Permit Attachment A1 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Container Storage” Appendix M1);~~

~~Permit Attachment A2 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Geologic Repository” Appendix M2);~~

~~Permit Attachment C (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Waste Analysis Plan” Chapter C);~~

~~Permit Attachment E (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Inspection Schedule, Process and Forms” Chapter D);~~



**PART 4 - GEOLOGIC REPOSITORY DISPOSAL**

**PART 4 - GEOLOGIC REPOSITORY DISPOSAL**

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## **PART 4 - GEOLOGIC REPOSITORY DISPOSAL**

### 4.1. DESIGNATED DISPOSAL UNITS

This Part authorizes the management and disposal of contact-handled (**CH**) and remote-handled (**RH**) transuranic (**TRU**) mixed waste containers in the Underground Hazardous Waste Disposal Units (**Underground HWDUs**) identified herein. Specific facility and process information for the management and disposal of CH and RH TRU mixed waste in the Underground HWDUs is incorporated in Permit Attachment A2 (Geologic Repository).

#### 4.1.1. Underground Hazardous Waste Disposal Units

The Underground HWDUs are located at the WIPP facility approximately 2,150 feet (665 meters) below the ground surface within the Salado formation. An Underground HWDU is a single excavated panel, consisting of seven rooms and two access drifts, designated for disposal of TRU mixed waste containers.

The Permittees may dispose TRU mixed waste in the Underground HWDUs, provided the Permittees comply with the following conditions:

##### 4.1.1.1. Disposal Containers

The Permittees shall dispose TRU mixed waste in containers specified in Permit Section 4.3.1.

##### 4.1.1.2. Disposal Locations and Quantities

The Permittees shall dispose TRU mixed waste containers in teneight Underground HWDUs, as specified in Table 4.1.1 below and depicted in Permit Attachment MA2, Figure M-43A2-1. The Permittees may dispose quantities of TRU mixed waste containers in these locations not to exceed the maximum capacities specified in Table 4.1.1 below. The Permittees may increase these capacities for a specific HWDU subject to the following conditions:

- i. The Permittees may submit a Class 1 permit modification requiring prior approval of the Secretary in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42(a)) to increase the CH TRU mixed waste capacity by 35,300 ft<sup>3</sup> (1,000 m<sup>3</sup>) or less, and the RH TRU mixed waste capacities in Panels 5 and 6 to a maximum of 22,950 ft<sup>3</sup> (650 m<sup>3</sup>).

At least 15 calendar days before submittal to NMED, the Permittees shall post a link to the Class 1 permit modification on the WIPP Home Page and inform those on the e-mail notification list.

- ii. Notwithstanding Permit Section 4.1.1.2.i, any Underground HWDU CH TRU waste capacity may be increased by up to 25 percent of the total maximum capacity in Table 4.1.1 by submitting a Class 2 permit modification request in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42(b)).

<b>Table 4.1.1 - Underground HWDUs</b>				
<b>Description<sup>1</sup></b>	<b>Waste Type</b>	<b>Maximum TRU Mixed Waste Capacity<sup>2</sup></b>	<b>Final TRU Mixed Waste Volume<sup>3</sup></b>	<b>Final LWA TRU Waste Volume<sup>4</sup></b>
Panel 1	CH TRU	636,000ft <sup>3</sup> (18,000 m <sup>3</sup> )	370,685.70 ft <sup>3</sup> (10,496.65 m <sup>3</sup> )	267,096.48 ft <sup>3</sup> (7,563.33 m <sup>3</sup> )
Panel 2	CH TRU	636,000 ft <sup>3</sup> (18,000 m <sup>3</sup> )	635,581.72 ft <sup>3</sup> (17,997.67 m <sup>3</sup> )	462,712.19 ft <sup>3</sup> (13,102.55 m <sup>3</sup> )
Panel 3	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	603,600.40 ft <sup>3</sup> (17,092.06 m <sup>3</sup> )	348,299.73 ft <sup>3</sup> (9,862.75 m <sup>3</sup> )
Panel 4	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	503,500.27 ft <sup>3</sup> (14,257.54 m <sup>3</sup> )	367,973.88 ft <sup>3</sup> (10,419.86 m <sup>3</sup> )
	RH TRU	12,570 ft <sup>3</sup> (356 m <sup>3</sup> )	6,223.15 ft <sup>3</sup> (176.22 m <sup>3</sup> )	2,974.91 ft <sup>3</sup> (84.24 m <sup>3</sup> )
Panel 5	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	562,454.22 ft <sup>3</sup> (15,926.93m <sup>3</sup> )	427,749.61 ft <sup>3</sup> (12,112.52 m <sup>3</sup> )
	RH TRU	15,720 ft <sup>3</sup> (445 m <sup>3</sup> )	8,297.53 ft <sup>3</sup> (234.96 m <sup>3</sup> )	5,416.21 ft <sup>3</sup> (153.37 m <sup>3</sup> )
Panel 6	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	510,911.06 ft <sup>3</sup> (14,467.39 m <sup>3</sup> )	403,569.65 ft <sup>3</sup> (11,427.82 m <sup>3</sup> )
	RH TRU	18,860 ft <sup>3</sup> (534 m <sup>3</sup> )	7,578.53 ft <sup>3</sup> (214.60 m <sup>3</sup> )	3,990.20 ft <sup>3</sup> (112.99 m <sup>3</sup> )
Panel 7	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )		
	RH TRU	22,950 ft <sup>3</sup> (650 m <sup>3</sup> )		
Panel 8	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )		
	RH TRU	22,950 ft <sup>3</sup> (650 m <sup>3</sup> )		
Panel 11	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )		
	RH TRU	22,950 ft <sup>3</sup> (650 m <sup>3</sup> )		
Panel 12	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )		

<b>Table 4.1.1 - Underground HWDUs</b>				
<b>Description<sup>1</sup></b>	<b>Waste Type</b>	<b>Maximum TRU Mixed Waste Capacity<sup>2</sup></b>	<b>Final TRU Mixed Waste Volume<sup>3</sup></b>	<b>Final LWA TRU Waste Volume<sup>4</sup></b>
	<b>RH TRU</b>	<b>22,950 ft<sup>3</sup> (650 m<sup>3</sup>)</b>		
<b>Total</b>	<b>CH TRU</b>	<b>6,569,200,5,244,900 ft<sup>3</sup> (186,000,148,500 m<sup>3</sup>)</b>		
	<b>RH TRU</b>	<b>138,950,93,050 ft<sup>3</sup> (3,935,2,635 m<sup>3</sup>)</b>		

<sup>1</sup> The area of each panel is approximately 124,150 ft<sup>2</sup> (11,533 m<sup>2</sup>).

<sup>2</sup> Maximum TRU Mixed Waste Capacity is the maximum TRU mixed waste volume that may be placed in each panel. This volume is calculated based on the gross internal volume of the outermost disposal containers.

<sup>3</sup> Final TRU Mixed Waste Volume is calculated based on the gross internal volume of the outermost disposal containers. The volume listed here is reported pursuant to Permit Part 6, Section 6.10.1.

<sup>4</sup> Final LWA TRU Waste Volume is calculated based on the volume of TRU waste inside a disposal container. The volume listed here is tracked and reported by the DOE internally pursuant to the WIPP Land Withdrawal Act total capacity limit of 6.2 million ft<sup>3</sup> (175,564 m<sup>3</sup>) of TRU waste (Pub. L. 102-579, as amended) and is included here for informational purposes. A link to the LWA TRU Waste Volume is posted on [www.wipp.energy.gov](http://www.wipp.energy.gov).

Note: The final TRU mixed waste and final LWA TRU waste volumes in Table 4.1.1 are reported to the nearest hundredth ft<sup>3</sup> and m<sup>3</sup>.

## 4.2. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

### 4.2.1. Permitted Waste

The Permittees may dispose TRU mixed waste in the Underground HWDUs, provided the Permittees comply with the following conditions:

#### 4.2.1.1. Waste Analysis Plan

The TRU mixed waste shall be characterized to comply with the waste analysis plan specified in Permit Section 2.3.1.

#### 4.2.1.2. TSDF Waste Acceptance Criteria

The TRU mixed waste shall comply with the treatment, storage, and disposal facility (TSDF) waste acceptance criteria specified in Permit Section 2.3.3.

#### 4.2.1.3. Hazardous Waste Numbers

The TRU mixed waste shall contain only hazardous waste numbers specified in Permit Section 2.3.4.

#### 4.2.1.4 Prioritization and Risk Reduction of New Mexico Waste

Pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.10.k), within 15 days of publishing the Annual Transuranic Waste Inventory Report (ATWIR), the Permittees shall certify to the NMED that there is sufficient disposal capacity to dispose of the New Mexico generator/storage site waste detailed in this report. The report shall contain the underlying calculations and data to validate the certification. While this permit remains in effect, the Permittees shall prioritize the emplacement of stored TRU mixed waste at WIPP from the clean-up activities at the Los Alamos National Laboratory (LANL). On an annual basis, the volume of stored TRU mixed waste emplaced in a HWDU from the LANL must exceed the volume of stored TRU mixed waste from all other individual generator sites.

Derived waste may be disposed in the Underground HWDUs as specified in Permit Section 2.3.5.

#### 4.2.2. Prohibited Waste

##### 4.2.2.1. General Prohibition

The Permittees shall not dispose any TRU mixed waste that fails to comply with Permit Section 4.2.1.

##### 4.2.2.2. Specific Prohibition

After this Permit becomes effective, the Permittees shall not dispose non-mixed TRU waste in any Underground HWDU unless such waste is characterized in accordance with the requirements of the WAP specified in Permit Section 2.3.1. The Permittees shall not dispose TRU mixed waste in any Underground HWDU if the Underground HWDU contains non-mixed TRU waste which was disposed of after this Permit became effective and was not characterized in accordance with the requirements of the WAP.

#### 4.3. DISPOSAL CONTAINERS

##### 4.3.1. Acceptable Disposal Containers

The Permittees shall use containers that comply with the requirements for U.S. Department of Transportation shipping container regulations (49 CFR §173 - Shippers - General Requirements for Shipment and Packaging, and 49 CFR §178 - Specifications for Packaging) for disposal of TRU mixed waste at WIPP. The Permittees are prohibited from disposing TRU mixed waste in any container not specified in Permit Attachment A1 (Container Storage), Section A1-1b, as set forth below:

4.3.1.1. Standard 55-gallon (208-liter) Drum

Standard 55-gallon drums are configured as a 7-pack or as an individual unit.

4.3.1.2. Standard Waste Box (SWB)

An SWB is configured as an individual unit.

4.3.1.3. Ten-drum Overpack (TDOP)

A TDOP is configured as an individual unit.

4.3.1.4. 85-gallon (322-liter) Drum

85-gallon drums are configured as a 4-pack or as an individual unit.

4.3.1.5. 100-gallon (379-liter) Drum

100-gallon drums are configured as a 3-pack or as an individual unit.

4.3.1.6. RH TRU Canister

An RH TRU canister is configured as an individual unit.

4.3.1.7. Standard Large Box 2 (SLB2)

An SLB2 is configured as an individual unit.

4.3.1.8. Shielded Container

Shielded containers are configured as a three-pack.

4.3.2. Condition of Containers

If a container holding TRU mixed waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak prior to disposal in an Underground HWDU, the Permittees shall manage the TRU mixed waste containers specified in Permit Section 4.3.1 as specified in Permit Attachment A1 and in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.171).

4.4. VOLATILE ORGANIC COMPOUND LIMITS

The Permittees shall limit releases to the air of volatile organic compound waste constituents (VOCs) as specified by the following conditions, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601(c)):



4.4.1. Room-Based Limits

The measured concentration of VOCs in any open (active) room and in each closed room in active panels within an Underground HWDUs Panels 1-7 shall not exceed the limits specified in Table 4.4.1:

<b>Table 4.4.1 - VOC Room-Based Limits <u>for Panels 1-7</u></b>			
<b>Compound</b>	<b>VOC Room-Based Concentration Limit (PPMV)</b>		
	<b><u>Panels 1-7</u></b>	<b><u>Panel 8</u></b>	<b><u>Panels 11-12</u></b>
Carbon Tetrachloride	9,625	<u>3,208</u>	<u>5,775</u>
Chlorobenzene	13,000	<u>13,000</u>	<u>13,000</u>
Chloroform	9,930	<u>3,310</u>	<u>5,958</u>
1,1-Dichloroethylene	5,490	<u>1,830</u>	<u>3,294</u>
1,2-Dichloroethane	2,400	<u>800</u>	<u>1,440</u>
Methylene Chloride	100,000	<u>33,333</u>	<u>60,000</u>
1,1,2,2-Tetrachloroethane	2,960	<u>986</u>	<u>1,776</u>
Toluene	11,000	<u>8,023</u>	<u>11,000</u>
1,1,1-Trichloroethane	33,700	<u>11,233</u>	<u>20,220</u>
Trichloroethylene	48,000	<u>16,000</u>	<u>28,800</u>

There are no maximum concentration limits for other VOCs.

~~There are no maximum concentration limits for other VOCs.~~

The measured concentration of VOCs in any open (active) room and in each closed room in active panels within Underground HWDU Panel 8 shall not exceed the limits specified in Table 4.4.2:

<b>Table 4.4.2 – VOC Room-Based Limits <u>for Panel 8</u></b>	
<b><u>Compound</u></b>	<b><u>VOC Room-Based Concentration Limit (PPMV)</u></b>
<u>Carbon Tetrachloride</u>	<u>3,208</u>
<u>Chlorobenzene</u>	<u>13,000</u>
<u>Chloroform</u>	<u>3,310</u>
<u>1,1-Dichloroethylene</u>	<u>1,830</u>
<u>1,2-Dichloroethane</u>	<u>800</u>
<u>Methylene Chloride</u>	<u>33,333</u>

<del>1,1,2,2-Tetrachloroethane</del>	<del>986</del>
<del>Toluene</del>	<del>8,023</del>
<del>1,1,1-Trichloroethane</del>	<del>11,233</del>
<del>Trichloroethylene</del>	<del>16,000</del>

~~There are no maximum concentration limits for other VOCs.~~

4.4.2. Determination of VOC Room-Based Limits

The Permittees shall confirm the VOC concentration and emission rate limits identified in Permit Section 4.4.1 using the VOC Monitoring Plan specified in Permit Attachment N (Volatile Organic Compound Monitoring Plan). The Permittees shall conduct monitoring of VOCs as specified in Permit Sections 4.6.2 and 4.6.3.

4.5. DESIGN, CONSTRUCTION, AND OPERATION REQUIREMENTS

The Permittees shall design, construct, and operate the Underground HWDUs as specified by the following conditions and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601):

4.5.1. Repository Design

The Permittees shall construct each Underground HWDU in conformance with the requirements specified in Permit Attachment A2 ~~and Permit Attachment A3 (“Typical Disposal Panel”)~~.

4.5.2. Repository Construction

4.5.2.1. Construction Requirements

Subject to Permit Section 4.5.1, the Permittees may excavate the following Underground HWDUs, as ~~depicted in Permit Attachment A2, Figure A2-1, “Repository Horizon”, and~~ specified in Section A2-2a(3), “Subsurface Structures (Underground Hazardous Waste Disposal Units (HWDUs))”:

- ~~Panel 2~~
- ~~Panel 3~~
- ~~Panel 4~~
- ~~Panel 5~~
- ~~Panel 6~~
- ~~Panel 7~~
- Panel 8
- Panel 11

- **Panel 12**

Prior to disposal of TRU mixed waste in a newly constructed Underground HWDU, the Permittees shall comply with the certification requirements specified in Permit Section 1.7.11.2.

4.5.2.2. Notification Requirements

At least 30 calendar days prior to the projected start date of excavation of each Underground HWDU, the Permittees shall provide written notification to the Secretary stating the projected start date of excavation, along with supporting rationale (e.g., projected waste receipt rate, etc.). The Permittees shall post a link to the notification transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

~~Prior to disposal of TRU mixed waste in a newly constructed Underground HWDU, the Permittees shall comply with the certification requirements specified in Permit Section 1.7.11.2.~~

4.5.3. Repository Operation

4.5.3.1. Underground Traffic Flow

The Permittees shall restrict and separate the ventilation and traffic flow areas in the underground TRU mixed waste handling and disposal areas from the ventilation and traffic flow areas for mining and construction equipment, except that during waste transport in W-30, ventilation need not be separated north of S-1600.

The Permittees shall designate routes for the traffic flow of TRU mixed waste handling equipment and construction equipment as required by Permit Attachment A3A4 (Traffic Patterns), Section A3A4-4, “Underground Traffic.” These routes will be recorded on a mine map that is posted in a location where persons entering the underground can read it. Whenever the routes are changed, the map will be updated. Maps will be available in facility files until facility closure.

4.5.3.2. Ventilation

The Permittees shall maintain a minimum active room ventilation rate of 35,000 standard ft<sup>3</sup>/min (scfm) in each active room when waste disposal is taking place and workers are present in the room, as specified in Permit Attachment A2, Section A2-2a(3), “Subsurface Structures (Underground Ventilation System Description),” and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601(c)). If an active room ventilation rate of

35,000 scfm cannot be met, actions as described in Permit Attachment O shall be taken during waste disposal operations when workers are present.

4.5.3.3. Ventilation Barriers

The Permittees shall construct ventilation barricades in active Underground HWDUs to restrict the flow of mine ventilation air through full disposal rooms, as specified in Permit Attachment A2, Section A2-2a(3), “Subsurface Structures (Underground Ventilation System Description)” and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601(c)).

4.6. MAINTENANCE AND MONITORING REQUIREMENTS

The Permittees shall maintain and monitor the Underground HWDUs as specified by the following conditions and as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.601 and 264.602):

4.6.1. Geomechanical Monitoring

4.6.1.1. Implementation of Geomechanical Monitoring Program

The Permittees shall implement a geomechanical monitoring program in each Underground HWDU as specified in Permit Attachment A2, Section A2-5b(2), “Geomechanical Monitoring” and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.602).

4.6.1.2. Reporting Requirements

The Permittees shall submit to the Secretary an annual report in October evaluating the geomechanical monitoring program and shall include geomechanical data collected from each Underground HWDU during the previous year, as specified in Permit Attachment A2, Section A2-5b(2), “Geomechanical Monitoring”, and shall also include a map showing the current status of HWDU mining.

4.6.1.3. Notification of Adverse Conditions

When evaluation of the geomechanical monitoring system data identifies a trend towards unstable conditions which requires a decision whether to terminate waste disposal activities in any Underground HWDU, the Permittees shall provide the Secretary with the same report provided to the WIPP Operations Manager within seven calendar days of its issuance, as specified in Permit Attachment A2, Section A2-5b(2)(a), “Description of the Geomechanical Monitoring System”. The Permittees shall post a link to the adverse condition notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

#### 4.6.2. Repository Volatile Organic Compound Monitoring

##### 4.6.2.1. Implementation of Repository VOC Monitoring

The Permittees shall implement repository VOC monitoring and the **Laboratory Performance Evaluation Plan (LPEP)** or proficiency testing, as specified in Permit Attachment N (Volatile Organic Compound Monitoring Plan) and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.602 and §264.601(c)). The Permittees shall implement repository VOC monitoring until the certified closure of all Underground HWDUs.

##### 4.6.2.2. Reporting Requirements

The Permittees shall report to the Secretary semi-annually in April and October the data and analysis of the VOC Monitoring Plan.

##### 4.6.2.3. Notification Requirements

After each sampling event for the compounds listed in Table 4.6.2.3, the Permittees shall calculate the total and running annual averages for the carcinogenic and the total non-carcinogenic risk to the non-waste surface worker, using the methodology in Attachment N and the recommended EPA risk factors listed in Table 4.6.2.3.

The Permittees shall notify the Secretary in writing, within seven calendar days of obtaining validated analytical results, whenever the total and/or the running annual average carcinogenic risk to the non-waste surface worker exceeds  $10^{-5}$  or the total and/or the running annual average non-carcinogenic risk as measured by the hazard index exceeds 1.0.

The Permittees shall post a link to any exceedance notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

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.

<b>Compound</b>	<b>Carcinogenic IUR (<math>\mu\text{g}/\text{m}^3</math>)<sup>-1</sup></b>	<b>Non-carcinogenic RfC (<math>\text{mg}/\text{m}^3</math>)</b>
Carbon Tetrachloride	$6.0 \times 10^{-6}$	$1.0 \times 10^{-1}$
Chlorobenzene	N/A	$5.0 \times 10^{-2}$
Chloroform	$2.3 \times 10^{-5}$	$9.8 \times 10^{-2}$

<b>Table 4.6.2.3 – Recommended EPA Risk Factors</b>		
<b>Compound</b>	<b>Carcinogenic IUR (<math>\mu\text{g}/\text{m}^3</math>)<sup>-1</sup></b>	<b>Non-carcinogenic RfC (<math>\text{mg}/\text{m}^3</math>)</b>
1,1-Dichloroethylene	N/A	$2.0 \times 10^{-1}$
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

RfC = Reference Concentration from EPA IRIS Database

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

#### 4.6.2.4. Remedial Action

If the running annual average for the total carcinogenic risk due to releases of VOCs specified in Table 4.6.2.3 exceeds  $10^{-5}$ , or if the running annual average for the total non-carcinogenic hazard index due to releases of VOCs specified in Table 4.6.2.3 exceeds 1.0, the Permittees shall cease disposal in the active CH waste disposal room and install ventilation barriers as specified in Permit Section 4.5.3.3. Alternatively, prior to reaching these action levels, the Permittees may propose an alternative remedial action plan to the Secretary. The Permittees may implement such plans in lieu of closing the active room only after approval by the Secretary.

If the running annual average for the total carcinogenic risk due to releases of VOCs specified in Table 4.6.2.3 exceeds  $10^{-5}$  or if the running annual average for the total non-carcinogenic hazard index due to releases of VOCs specified in Table 4.6.2.3 exceeds 1.0 for six consecutive months, the Permittees shall close the affected Underground HWDU as specified in Permit Section 4.1.1. Alternatively, prior to reaching these action levels for six consecutive months, the Permittees may propose an alternative remedial action plan to the Secretary. The Permittees may implement such plans in lieu of closing the active HWDU only after approval by the Secretary.

For any remedial action taken under this Permit Section, the Permittees shall submit to the Secretary written quarterly status reports, beginning 30 calendar days after the Permittees submit the initial notification in Permit Section 4.6.2.3 which resulted in the remedial action. The quarterly status

report shall analyze the cause of exceedance, describe the implementation and results of the remedial action, and describe measures taken to prevent future exceedances. The Permittees shall submit such reports until the Secretary determines the remedial action has been completed in accordance with all applicable requirements of this Permit.

4.6.3. Disposal Room Volatile Organic Compound Monitoring

4.6.3.1. Implementation of Disposal Room VOC Monitoring

The Permittees shall implement disposal room VOC monitoring as specified in Permit Attachment N and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.602 and §264.601(c)) and Section 310 of Public Law 108-447.

4.6.3.2. Notification Requirements

The Permittees shall notify the Secretary in writing, within seven calendar days of obtaining validated analytical results, whenever the concentration of any VOC specified in ~~either Table 4.4.1 or Table 4.4.2, as appropriate,~~ in any closed room in an active panel, or in the immediately adjacent closed room exceeds the action levels specified in Table ~~4.6.3.2 or Table 4.6.3.3, as appropriate.~~ The Permittees shall post a link to the exceedance notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

<b>Table 4.6.3.2 - Action Levels for Disposal Room Monitoring <del>in Panels 1-7</del></b>		
<b>Compound</b>	<b>50% Action Level for VOC Constituents of Concern in Any Closed Room, ppmv</b>	<b>95% Action Level for VOC Constituents of Concern in Active Open or Immediately Adjacent Closed Room, ppmv</b>
<b><u>Panels 1-7</u></b>		
Carbon Tetrachloride	4,813	9,145
Chlorobenzene	6,500	12,350
Chloroform	4,965	9,433
1,1-Dichloroethylene	2,745	5,215
1,2-Dichloroethane	1,200	2,280
Methylene Chloride	50,000	95,000
1,1,2,2-Tetrachloroethane	1,480	2,812
Toluene	5,500	10,450

<b>Table 4.6.3.2 - Action Levels for Disposal Room Monitoring <del>in Panels 1-7</del></b>		
<b>Compound</b>	<b>50% Action Level for VOC Constituents of Concern in Any Closed Room, ppmv</b>	<b>95% Action Level for VOC Constituents of Concern in Active Open or Immediately Adjacent Closed Room, ppmv</b>
1,1,1-Trichloroethane	16,850	32,015
Trichloroethylene	24,000	45,600
<b><u>Panel 8</u></b>		
<u>Carbon Tetrachloride</u>	<u>1,604</u>	<u>3,047</u>
<u>Chlorobenzene</u>	<u>6,500</u>	<u>12,350</u>
<u>Chloroform</u>	<u>1,655</u>	<u>3,144</u>
<u>1,1-Dichloroethylene</u>	<u>915</u>	<u>1,738</u>
<u>1,2-Dichloroethane</u>	<u>400</u>	<u>760</u>
<u>Methylene Chloride</u>	<u>16,665</u>	<u>31,665</u>
<u>1,1,2,2-Tetrachloroethane</u>	<u>493</u>	<u>936</u>
<u>Toluene</u>	<u>4,011</u>	<u>7,621</u>
<u>1,1,1-Trichloroethane</u>	<u>5,616</u>	<u>10,671</u>
<u>Trichloroethylene</u>	<u>8,000</u>	<u>15,200</u>
<b><u>Panels 11-12</u></b>		
<u>Carbon Tetrachloride</u>	<u>1,604</u>	<u>3,047</u>
<u>Chlorobenzene</u>	<u>6,500</u>	<u>12,350</u>
<u>Chloroform</u>	<u>1,655</u>	<u>3,144</u>
<u>1,1-Dichloroethylene</u>	<u>915</u>	<u>1,738</u>
<u>1,2-Dichloroethane</u>	<u>400</u>	<u>760</u>
<u>Methylene Chloride</u>	<u>16,665</u>	<u>31,665</u>
<u>1,1,2,2-Tetrachloroethane</u>	<u>493</u>	<u>936</u>
<u>Toluene</u>	<u>4,011</u>	<u>7,621</u>
<u>1,1,1-Trichloroethane</u>	<u>5,616</u>	<u>10,671</u>
<u>Trichloroethylene</u>	<u>8,000</u>	<u>15,200</u>



<b>Table 4.6.3.3—Action Levels for Disposal Room Monitoring in Panel 8</b>		
<b>Compound</b>	<b>50% Action Level for VOC Constituents of Concern in Any Closed Room, ppmv</b>	<b>95% Action Level for VOC Constituents of Concern in Active Open or Immediately Adjacent Closed Room, ppmv</b>
Carbon Tetrachloride	1,604	3,047
Chlorobenzene	6,500	12,350
Chloroform	1,655	3,144
1,1-Dichloroethylene	915	1,738
1,2-Dichloroethane	400	760
Methylene Chloride	16,665	31,665
1,1,2,2-Tetrachloroethane	493	936
Toluene	4,011	7,621
1,1,1-Trichloroethane	5,616	10,671
Trichloroethylene	8,000	15,200

4.6.3.3. Remedial Action

Upon receiving validated analytical results that indicate one or more of the VOCs specified in Table 4.4.1 or Table 4.4.2, in any of the closed rooms in an active panel has reached the “50% Action Level” in Table 4.6.3.2 or Table 4.6.3.3, the sampling frequency for such closed rooms will increase to once per week. The once per week sampling will continue either until the concentrations in the closed room(s) fall below the “50% Action Level”, or until closure of Room 1 of the panel, whichever occurs first. If one or more of the VOCs in Table 4.4.1 or Table Error! Hyperlink reference not valid., in the active open room or immediately adjacent closed room reaches the “95% Action Level” in Table 4.6.3.2 or Table Error! Hyperlink reference not valid., as appropriate, another sample will be taken to confirm the existence of such a condition. If the second sample confirms that one or more of VOCs in the immediately adjacent closed room have reached the “95% Action Level”, the active open room will be abandoned, ventilation barriers will be installed as specified in Permit Section 4.5.3.3, waste emplacement will proceed in the next open room, and monitoring of the subject closed room will continue at a frequency of once per week until commencement of panel closure. Alternatively, prior to reaching these action levels, the Permittees may propose an alternative remedial action plan to the Secretary. The

Permittees may implement such plans in lieu of closing and abandoning the active room only after approval by the Secretary.

#### 4.6.4. Mine Ventilation Rate Monitoring

##### 4.6.4.1. Implementation of Mine Ventilation Rate Monitoring Plan

The Permittees shall implement the Mine Ventilation Rate Monitoring Plan specified in Permit Attachment O (WIPP Mine Ventilation Rate Monitoring Plan) until the certified closure of all Underground HWDUs and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.602 and §264.601(c)).

##### 4.6.4.2. Reporting Requirements

The Permittees shall report to the Secretary annually in October the results of the data and analysis of the Mine Ventilation Rate Monitoring Plan.

##### 4.6.4.3. Notification Requirements

The Permittees shall evaluate compliance with the minimum active room ventilation rate specified in Permit Section 4.5.3.2 on a monthly basis. The Permittees shall report to the Secretary in the annual report specified in Permit Section 4.6.4.2 whenever the evaluation of the mine ventilation monitoring program data identifies that the ventilation rate specified in the Permit Section 4.5.3.2 has not been achieved.

#### 4.7. INSPECTION SCHEDULES AND PROCEDURES

The Permittees shall inspect the Underground HWDUs at least weekly, as specified in Permit Attachment E (Inspection Schedule, Process and Forms), Tables E-1 and E-1a, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.15). The Permittees shall perform these inspections to detect malfunctions, signs of deterioration, operator errors, discharges, or any other factors which have caused or may cause a release of hazardous wastes or hazardous waste constituents to the environment or which may compromise the ability of any Underground HWDU to comply with the environmental performance standards in 20.4.1.500 NMAC (incorporating 40 CFR §264.601).

#### 4.8. RECORDKEEPING

##### 4.8.1. Underground HWDU Location Map

The Permittees shall maintain, in the operating record, a map containing the exact location and dimensions of each Underground HWDU with respect to permanently surveyed benchmarks.

#### 4.8.2. Disposal Waste Type and Location

The Permittees shall maintain, in the operating record, a record identifying the types and quantities of TRU mixed waste in each Underground HWDU and the disposal location of each container or container assembly (e.g., a 7-pack of standard 55-gallons drums) within each Underground HWDU, using the following fields from the WWIS data dictionary:

1. Panel Number
2. Room Number or Drift Number
3. Row Number (for CH TRU mixed waste) or Borehole Number (for RH TRU mixed waste)
4. Column Number (for CH TRU mixed waste)
5. Column Height (for CH TRU mixed waste)
6. Container Type Code
7. Container Identification Number
8. Manifest Document Number
9. Disposal Date

The Permittees shall also maintain, in the operating record, a map or diagram depicting the location and quantity of each waste. The map or diagram shall include a cross reference to specific manifest document numbers, if the waste was accompanied by a manifest, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(2)).

#### 4.8.3. Ventilation Rate

The Permittees shall maintain, in the operating record, a record identifying any non-conformance to the ventilation rate specified in Permit Section 4.5.3.2.

## PERMIT ATTACHMENTS

~~Permit Attachment A1 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "Container Storage"—Appendix M1).~~

~~Permit Attachment A2 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "Geologic Repository"—Appendix M2).~~

~~Permit Attachment A3 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "Underground Facilities Typical Disposal Panel"—Drawing Number 51-W-214-W, Appendix M3).~~

~~Permit Attachment A4 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "Traffic Patterns"—Chapter G).~~

~~Permit Attachment E (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "Inspection Schedule, Process and Forms"—Chapter D).~~

~~Permit Attachment G1, "WIPP Panel Closure Design Description and Specifications."~~

~~Permit Attachment N (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "Volatile Organic Compound Monitoring Plan"—Chapter N).~~

~~Permit Attachment O (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "WIPP Mine Ventilation Rate Monitoring Plan"—Chapter Q).~~

**PART 5 - GROUNDWATER DETECTION MONITORING**

**PART 5 - GROUNDWATER DETECTION MONITORING**

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## **PART 5 - GROUNDWATER DETECTION MONITORING**

### **5.1. DETECTION MONITORING PROGRAM**

This Part specifies the requirements of the Detection Monitoring Program (**DMP**). The DMP shall establish background groundwater quality and monitor indicator parameters and waste constituents that provide a reliable indication of the presence of hazardous constituents in the groundwater, as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.97 and 264.98).

The DMP consists of six Detection Monitoring Wells (**DMWs**) located hydraulically upgradient and at the downgradient point of compliance of the WIPP Underground Hazardous Waste Disposal Units (**Underground HWDUs**). The DMWs are screened in the Culebra Member of the Rustler Formation.

A DMP is necessary to demonstrate compliance with the environmental performance standard for the Underground HWDUs, as specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.601(a)). This environmental performance standard requires prevention of any releases that may have adverse effects on human health or the environment due to migration of waste constituents in the groundwater or subsurface environment.

### **5.2. IDENTIFICATION OF POINT OF COMPLIANCE**

The point of compliance is the vertical surface located perpendicular to the groundwater flow direction at the DMWs that extends to the Culebra Member of the Rustler Formation [20.4.1.500 NMAC (incorporating 40 CFR §§264.95, 264.601, and 264.602)]. The Permittees shall conduct the DMP at DMWs specified in Table 5.3.1, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.98 and 264.601).

### **5.3. WELL LOCATION, MAINTENANCE, AND PLUGGING AND ABANDONING**

The Permittees shall conduct the DMP according to the requirements of this Permit and 20.4.1.500 NMAC (incorporating 40 CFR §264 Subpart F) for the DMWs in the Culebra Member of the Rustler Formation.

The Permittees shall maintain the DMP in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.97), and as specified below:

#### **5.3.1. Well Locations**

The Permittees shall maintain the DMWs at the locations specified on the map in Figure M-70L-6 of Permit Attachment M-L (WIPP Groundwater Detection Monitoring Program Plan), as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.97(a) and §264.98(b)), and as specified in Table 5.3.1 below:



<b>Table 5.3.1 - Well Locations</b>				
<b>Well Name</b>	<b>State Plane Coordinates</b>	<b>Top of Casing Elevation (ft amsl)</b>	<b>Screen Interval Depth (ft below ground surface)</b>	<b>Sampled Unit</b>
WQSP-1	663595E, 503784N	3419.2	702 - 727	Culebra
WQSP-2	667580E, 505537N	3463.9	811 - 836	Culebra
WQSP-3	670573E, 503991N	3480.1	844 - 869	Culebra
WQSP-4	670645E, 494986N	3433.1	764 - 789	Culebra
WQSP-5	667165E, 493665N	3384.4	646 - 671	Culebra
WQSP-6	663681E, 494948N	3364.7	581 - 606	Culebra

5.3.2. Well Maintenance

The Permittees shall maintain the DMWs specified in Table 5.3.1 and in Permit Attachment L, Section L-3b and in Permit Attachment M, Figures ~~M-71L-7~~ through ~~M-76L-12~~, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.97(c) and §264.98(b)).

5.3.3. Well Plugging and Abandoning

The Permittees may propose to plug and abandon a DMW by submitting a permit modification request to the Secretary in compliance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42). The Permittees shall plug and abandon any DMW in a manner which eliminates physical hazards, prevents groundwater contamination, conserves hydrostatic head, and prevents intermixing of subsurface water. The Permittees shall submit a report to the Secretary which summarizes and certifies DMW plugging and abandoning methods within 90 calendar days from the date a DMW is removed from the DMP.

5.4. DETECTION MONITORING PROGRAM PARAMETERS AND CONSTITUENTS

The Permittees shall conduct the DMP at the DMWs as specified in Table 5.3.1 for the indicator parameters listed in Table 5.4.a and the hazardous constituents listed in Table 5.4.b below and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(a)):

<b>Table 5.4.a – Indicator Parameters</b>	
pH	Specific conductance
Total organic carbon (TOC)	
Total dissolved solids (TDS)	Total suspended solids (TSS)
Specific Gravity	Calcium
Magnesium	Potassium
Chloride	

<b>Table 5.4.b – Hazardous Constituents</b>	
Chloroform	1,2-dichloroethane
Carbon tetrachloride	Chlorobenzene
1,1-dichloroethylene	1,1-dichloroethane
Methylene chloride	1,1,2,2-tetrachloroethane
Toluene	1,1,1-trichloroethane
Cresols	1,4-dichlorobenzene
1,2-dichlorobenzene	trans-1,2-dichloroethylene
2,4-dinitrophenol	2,4-dinitrotoluene
Hexachloroethane	Hexachlorobenzene
Isobutanol	Methyl ethyl ketone
	Pentachlorophenol
Pyridine	Tetrachloroethylene
1,1,2-Trichloroethane	Trichloroethylene
Trichlorofluoromethane	Xylenes
Nitrobenzene	Vinyl chloride
Arsenic	Barium
Cadmium	Chromium
Lead	Mercury
Selenium	Silver
Antimony	Beryllium
Nickel	Thallium
Vanadium	

5.5. SAMPLING AND ANALYSIS PROCEDURES

Except as provided in Permit Section 5.6, the Permittees shall use the following techniques and procedures to obtain and analyze DMP samples from the DMWs specified in Table 5.3.1, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.97(d) and (e)):

5.5.1. Sample Collection Procedures

The Permittees shall collect one DMP sample and one DMP sample duplicate annually from each DMW using the procedures specified in Permit Attachment L, Section L-4c, as

required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.97(g)(2), 264.98(d), and 264.601(a)).

5.5.2. Sample Preservation and Shipment Procedures

The Permittees shall preserve and ship DMP samples using the procedures specified in Permit Attachment L, Section L-4c(2)(iv).

5.5.3. Analytical Procedures

The Permittees shall analyze DMP samples using the procedures specified in Permit Attachment L, Section L-4c(3).

5.5.4. Chain of Custody Procedures

The Permittees shall track and control DMP samples using the chain of custody procedures specified in Permit Attachment L, Section L-4c(2)(v).

5.6. BACKGROUND GROUNDWATER QUALITY

For those hazardous constituents listed in Table 5.4.b, and for all substances listed in 20.4.1.500 NMAC (incorporating 40 CFR §264 Appendix IX), the background groundwater quality values specified in Table 5.6 are established as specified in 20.4.1.500 NMAC (incorporating 40 CFR §§264.97(g) and 264.98(d)).

<b>Hazardous Constituent</b>	<b>WQSP-1</b>	<b>WQSP-2</b>	<b>WQSP-3</b>	<b>WQSP-4</b>	<b>WQSP-5</b>	<b>WQSP-6</b>
Chloroform	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
1,2-dichloroethane	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Carbon tetrachloride	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Chlorobenzene	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
1,1-dichloroethylene	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
1,1-dichloroethane	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Methylene chloride	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
1,1,2,2-tetrachloroethane	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Toluene	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
1,1,1-trichloroethane	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Cresols	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
1,4-dichlorobenzene	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
1,2-dichlorobenzene	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
trans-1,2-dichloroethylene	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L

**Table 5.6 – WQSP Well Background Values**

<b>Hazardous Constituent</b>	<b>WQSP-1</b>	<b>WQSP-2</b>	<b>WQSP-3</b>	<b>WQSP-4</b>	<b>WQSP-5</b>	<b>WQSP-6</b>
2,4-dinitrophenol	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
2,4-dinitrotoluene	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Hexachloroethane	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Hexachlorobenzene	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Isobutanol	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Methyl ethyl ketone	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Pentachlorophenol	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Pyridine	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Tetrachloroethylene	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
1,1,2-Trichloroethane	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Trichloroethylene	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Trichlorofluoromethane	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Xylenes	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Nitrobenzene	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L	5.00 µg/L
Vinyl chloride	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L	1.00 µg/L
Arsenic	0.10 mg/L	0.06 mg/L	0.21 mg/L	0.50 mg/L	0.50 mg/L	0.50 mg/L
Barium	1.00 mg/L	1.00 mg/L	1.00 mg/L	1.00 mg/L	1.00 mg/L	1.00 mg/L
Cadmium	0.20 mg/L	0.50 mg/L	0.50 mg/L	0.50 mg/L	0.05 mg/L	0.05 mg/L
Chromium	0.50 mg/L	0.50 mg/L	2.00 mg/L	2.00 mg/L	0.50 mg/L	0.50 mg/L
Lead	0.11 mg/L	0.17 mg/L	0.80 mg/L	0.53 mg/L	0.05 mg/L	0.15 mg/L
Mercury	.002 mg/L	.002 mg/L	.002 mg/L	.002 mg/L	.002 mg/L	.002 mg/L
Selenium	0.15 mg/L	0.15 mg/L	2.00 mg/L	2.00 mg/L	0.10 mg/L	0.10 mg/L
Silver	0.50 mg/L	0.50 mg/L	0.31 mg/L	0.52 mg/L	0.50 mg/L	0.50 mg/L
Antimony	0.33 mg/L	0.50 mg/L	1.00 mg/L	0.80 mg/L	0.07 mg/L	0.14 mg/L
Beryllium	0.02 mg/L	1.00 mg/L	0.10 mg/L	0.25 mg/L	0.02 mg/L	0.02 mg/L
Nickel	0.50 mg/L	0.50 mg/L	5.00 mg/L	5.00 mg/L	0.10 mg/L	0.50 mg/L
Thallium	1.00 mg/L	1.00 mg/L	5.80 mg/L	1.00 mg/L	0.21 mg/L	0.56 mg/L
Vanadium	0.10 mg/L	0.10 mg/L	5.00 mg/L	5.00 mg/L	2.70 mg/L	0.10 mg/L

## 5.7. GROUNDWATER SURFACE ELEVATION DETERMINATION

### 5.7.1. DMP Groundwater Surface Elevation Determination

The Permittees shall determine the groundwater surface elevation at each DMW specified in Table 5.3.1 each time the groundwater is sampled in compliance with Permit Sections 5.5.1 and 5.9.2, using the methods specified in Permit Attachment L, Section L-4c(1), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.97(f)).

### 5.7.2. Regional Groundwater Surface Elevation Determination

The Permittees shall determine the groundwater surface elevation on a monthly basis for each well completed in the Culebra Member of the Rustler Formation in the WIPP Groundwater Level Monitoring Program, as specified in Permit Attachment L, Section L-4c(1).

## 5.8. GROUNDWATER FLOW DETERMINATION

The Permittees shall determine the groundwater flow rate and direction in the Culebra Member of the Rustler Formation at least annually, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(e)). The Permittees shall use groundwater surface elevation data specified in Permit Section 5.7 to determine groundwater flow.

## 5.9. DATA EVALUATION

### 5.9.1. Statistical Procedures

The Permittees shall use the statistical analysis methods specified in Permit Attachment L, Section L-4e, to evaluate DMP data for each hazardous constituent as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.97(h)). These statistical analysis methods shall comply with the appropriate performance standards specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.97(i)).

### 5.9.2. Groundwater Quality Determination

The Permittees shall sample DMWs as specified in Permit Section 5.5.1 and conduct statistical tests to determine whether there is statistically significant evidence of contamination for any hazardous constituent specified in Table 5.4.b during the active life of the WIPP facility and post-closure care period as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.90(c)).

### 5.9.3. Data Evaluation

The Permittees shall determine whether there is statistically significant evidence of contamination for any hazardous constituent identified in Table 5.4.b each time the DMWs are sampled as specified in Permit Section 5.9.2. In determining whether statistically significant evidence of contamination exists, the Permittees shall compare the groundwater

quality at each DMW specified in Table 5.3.1 to the background groundwater quality determined pursuant to Permit Section 5.6, in compliance with the statistical procedures specified in Permit Section 5.9.1, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(f)).

#### 5.9.4. Data Evaluation Timeframe

The Permittees shall perform the data evaluations specified in Permit Section 5.9.3 within 120 calendar days after completion of DMP sampling, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(f)(2)).

### 5.10. RECORDKEEPING AND REPORTING

#### 5.10.1. Operating Record Requirements

The Permittees shall enter all DMP monitoring, testing, and analytical data in the operating record as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.73(b)(6)). The Permittees shall enter these data, as measured and in a form appropriate for the determination of statistically significant evidence of contamination, into the operating record as specified in Permit Section 5.9.1 and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(c)).

#### 5.10.2. Submittal of Results

##### 5.10.2.1. Data Evaluation Results

The Permittees shall submit to the Secretary the analytical results required by Permit Sections 5.5 and 5.9.2, and the results of the statistical analyses required by Permit Section 5.9.3, in the Annual Culebra Groundwater Report by November 30 of each year as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.97(j)).

##### 5.10.2.2. Groundwater Surface Elevation Results

The Permittees shall submit to the Secretary groundwater surface elevation data specified in Permit Section 5.7. This submittal shall include both groundwater surface elevations calculated from field measurements and fresh-water head elevations calculated as specified in Permit Attachment L, Section L-4c(1). Water level data shall be reported semiannually by May 31 and November 30. The November water level data report shall be combined with the Annual Culebra Groundwater Report specified in Permit Part 5.10.2.1.

##### 5.10.2.3. Groundwater Flow Results

The Permittees shall submit to the Secretary an evaluation of the groundwater flow data (to include annotated hydrographs) specified in

Permit Section [5.8](#) in the Annual Culebra Groundwater Report by November 30 of each calendar year.

### 5.10.3. Determination of Contamination

If the Permittees determine, pursuant to Permit Section [5.9](#) and 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)), that there is statistically significant evidence of contamination for any hazardous constituent specified in Table [5.4.b](#), the Permittees shall comply with the following:

#### 5.10.3.1. Notification

The Permittees shall notify the Secretary in writing within seven calendar days, indicating what hazardous constituents have shown statistically significant evidence of contamination, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(1)).

#### 5.10.3.2. Appendix IX Sampling

The Permittees shall immediately, but no later than one month, sample the groundwater in all DMWs specified in Table [5.3.1](#) for which there was statistically significant evidence of contamination. The remaining DMWs shall be sampled within two months after statistically significant evidence of contamination is found in any DMW. All DMWs shall be sampled to determine the concentration of all substances identified in 20.4.1.500 NMAC (incorporating 40 CFR §264 Appendix IX), as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(2)).

#### 5.10.3.3. Verification Sampling

As specified by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(3)), for any substances found in the initial analysis pursuant to Permit Section [5.10.3.2](#), the Permittees may resample within one month and repeat the analysis for those compounds detected. If the results of the second analysis confirm the initial analysis, these substances shall form the basis for compliance monitoring specified in Permit Section [5.10.3.4](#). If the Permittees do not resample, the substances found during the initial analysis specified in Permit Section [5.10.3.2](#) shall form the basis for compliance monitoring specified in Permit Section [5.10.3.4](#).

#### 5.10.3.4. Submittal of Compliance Monitoring Program

The Permittees shall, within 90 calendar days, submit to the Secretary an application for a permit modification to establish a compliance monitoring program meeting the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.99). The application shall include the

following information, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(4)):

- i. An identification of the concentration of any hazardous constituent specified in Table 5.4.b or any Appendix IX substance detected in the ground water at each DMW at the compliance point.
- ii. Any proposed changes to the DMP necessary to meet the compliance monitoring requirements as specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.99).
- iii. Any proposed additions or changes to the monitoring frequency, sampling and analysis procedures or methods, or statistical methods used necessary to meet the compliance monitoring requirements as specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.99).
- iv. For each hazardous constituent detected at the compliance point, a proposed concentration limit or a notice of intent to seek an alternate concentration limit for a hazardous constituent required by 20.4.1.500 NMAC (incorporating 40 CFR §264.94).

#### 5.10.3.5. Submittal of Additional Information

The Permittees shall, within 180 calendar days, submit to the Secretary the following information, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(5)):

- i. All data necessary to justify an alternate concentration limit proposed in compliance with Permit Section 5.10.3.4.iv.
- ii. An engineering feasibility plan for corrective action required by 20.4.1.500 NMAC (incorporating 40 CFR §264.100), if necessary.

#### 5.10.4. Demonstration of Outside Contamination

If the Permittees determine, pursuant to Permit Section 5.9, that there is a statistically significant difference for hazardous constituents specified in Table 5.4.b at any DMW at the compliance point, they may demonstrate that a source other than a regulated unit caused the increase or that the detection is an artifact caused by an error in sampling, analysis, statistical evaluation, or natural variation in the ground water. In such cases, the Permittees shall comply with the following:



5.10.4.1. Notification

The Permittees shall notify the Secretary in writing within seven calendar days of determining statistically significant evidence of contamination at the compliance point that they intend to make a demonstration of outside contamination, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(6)(i)).

5.10.4.2. Submittal of Demonstration

The Permittees shall, within 90 calendar days, submit a report to the Secretary which demonstrates that a source other than a regulated unit caused the contamination, or that the contamination resulted from error in sampling, analysis, or evaluation, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(6)(ii)).

5.10.4.3. Submittal of Modification Request

The Permittees shall, within 90 calendar days, submit to the Secretary an application for a permit modification to make any appropriate changes to the DMP, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(6)(iii)).

5.10.4.4. Continued Monitoring

The Permittees shall continue to monitor in compliance with the DMP, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)(6)(iv)).

5.11. REQUEST FOR PERMIT MODIFICATION

If the Permittees or the Secretary determines that the DMP no longer satisfies the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264 Subpart F) and this Permit Part, the Permittees shall, within 90 calendar days of the determination, submit an application for a permit modification to make any appropriate changes to the program in compliance with 20.4.1.500 and .900 NMAC (incorporating 40 CFR §264.98(h) and §270.42).

PERMIT ATTACHMENTS

~~Permit Attachment L (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, "WIPP Groundwater Detection Monitoring Program Plan" Chapter L).~~

**PART 6 – CLOSURE REQUIREMENTS**

**PART 6 – CLOSURE REQUIREMENTS**

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## **PART 6 – CLOSURE REQUIREMENTS**

### 6.1. OVERVIEW

This Part specifies the closure requirements for the WIPP facility. The Permittees shall close the permitted Container Storage Units and Underground Hazardous Waste Disposal Units (**Underground HWDUs**) in accordance with the requirements in 20.4.1.500 NMAC (incorporating 40 CFR §§264.110 through 264.116 and §264.178), this Permit Part, and the procedures described in Permit Attachment G (Closure Plan).

### 6.2. PERFORMANCE STANDARD

The Permittees shall close the facility as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.111).

### 6.3. AMENDMENT TO CLOSURE PLAN

The Permittees shall amend Permit Attachment G, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.112(c)), whenever necessary.

### 6.4. NOTIFICATION OF CLOSURE

The Permittees shall notify the Secretary in writing at least 60 calendar days prior to the date on which they expect to begin partial closure, e.g., closure of an Underground Hazardous Waste Disposal Unit (**Underground HWDU**), or final closure of the facility as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.112(d) and 264.601). The Permittees shall post a link to the closure notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

### 6.5. TIME ALLOWED FOR CLOSURE

#### 6.5.1. Partial Closure

Upon completion of disposal operations in an Underground HWDU or upon completion of decontamination and decommission of surface equipment, structures, and soils, the Permittees shall complete partial closure activities as specified in Permit Attachment G, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.113).

#### 6.5.2. Final Facility Closure

When the Permit term has expired or After the HWDUs have received the final volume of waste as specified in Permit Part 4, Table 4.1.1, the Permittees shall remove from the facility all non-mixed hazardous waste, dispose in the Underground HWDUs all TRU-mixed hazardous waste and derived waste, and complete closure activities as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.113).

6.6. DISPOSAL OR DECONTAMINATION OF EQUIPMENT, STRUCTURES, AND SOILS

As part of either partial closure or final facility closure, the Permittees shall decontaminate or dispose of contaminated equipment, structures, and soils, as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.114).

6.7. CERTIFICATION OF CLOSURE

Within 60 calendar days of completion of closure of each Underground HWDU, and within 60 calendar days of completion of final closure, the Permittees shall certify in writing to the Secretary that the Underground HWDUs and/or facility have been closed as specified in Permit Attachment G and as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.115 and 264.601).

6.8. SURVEY PLAT

No later than the submission of the certification of closure of each Underground HWDU, the Permittees shall submit a survey plat detailing the location and dimensions of each Underground HWDU with respect to permanently surveyed benchmarks, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.116).

6.9. CLOSURE OF PERMITTED CONTAINER STORAGE UNITS

At closure of the WHB Unit and Parking Area Unit, the Permittees shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in Permit Attachment G, as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.178).

6.10. CLOSURE OF PERMITTED DISPOSAL UNITS

6.10.1. Panel Closure

The Permittees shall close each Underground HWDU in a manner that meets the closure standard for volatile organic compounds in Table 6.10.1, which represent health based levels (**HBLs**) at the location of the nearest resident beyond the WIPP site boundary. Upon completion of disposal in an Underground HWDU, the Permittees shall provide written notification to the Secretary stating the final TRU mixed waste volume, calculated based on the gross internal volume of the outermost disposal container, emplaced in the Underground HWDU. The Permittees shall also close the Underground HWDU as specified in Permit Attachment G and Permit Attachment G1 (*WIPP Panel Closure Design Description and Specifications*) and submit a Closure Report to the Secretary pursuant to 20.4.2.201.G NMAC. The Permittees shall post a link to the final Underground HWDU TRU mixed waste volume notice transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11.

<b>Table 6.10.1. WIPP Panel Closure Volatile Organic Compound Closure Standard for Public Exposures</b>	
<b>Volatile Organic Compound</b>	<b>WIPP HBL <math>\mu\text{g}/\text{m}^3</math></b>
Carbon Tetrachloride	0.33
Toluene	5,000
Trichloroethylene	0.39
Chloroform	0.087
Methylene Chloride	101
1,1,1-Trichloroethane	5,000
1,1,2,2-Tetrachloroethane	0.035
1,2-Dichloroethane	0.077
1,1-Dichloroethylene	200
Chlorobenzene	50.0

6.10.2. Repository Closure

Upon completion of disposal in the repository and closure of all Underground HWDUs, the Permittees shall close the repository as specified in Permit Attachment G and Permit Attachment G2 (Shaft Sealing System Compliance Submittal Design Report).

6.10.3. Repository Post-Closure

Upon completion of repository closure as specified in Permit Section 6.10.2, the Permittees shall comply with all post-closure requirements as specified in Permit Part 7, Post-Closure Care.

PERMIT ATTACHMENTS

~~Permit Attachment G, "Closure Plan."~~

~~Permit Attachment G1, "WIPP Panel Closure Design Description and Specifications."~~

~~Permit Attachment G2 (as modified from WIPP RCRA Part B Permit Application, "Shaft Sealing System Compliance Submittal Design Report" Appendix I2).~~



**PART 7 - POST-CLOSURE CARE PLAN**

**PART 7 - POST-CLOSURE CARE PLAN**

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## PART 7 - POST-CLOSURE CARE PLAN

### 7.1. OVERVIEW

This Part specifies the post-closure care requirements for the WIPP facility. Post-closure care requirements are applicable to Underground Hazardous Waste Disposal Units (**Underground HWDUs**) and include requirements for routine inspection and maintenance of the closed panel entry drifts, and air monitoring as required. Post-closure care requirements apply immediately after certification of closure of each Underground HWDU and continue for 30 years after final closure of the facility. Post-closure care requires active institutional controls including fencing and warning signs, inspections, maintenance, monitoring of ground water, and control and cleanup of releases.

### 7.2. UNIT IDENTIFICATION

The Permittees shall provide post-closure care for the closed Underground HWDUs (**eight** panels and **two** access drifts), and for the facility after final closure, as specified in Permit Attachment H (Post-Closure Plan) and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.110(b)).

### 7.3. POST-CLOSURE PROCEDURES AND USE OF PROPERTY

The Permittees shall conduct post-closure care after completion of closure of each Underground HWDU identified in Permit Section 7.2 and shall continue post-closure care for thirty (30) years after the date of certification of final closure of the facility, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(a)(1)). The Permittees may request, at any time during the post-closure care period, a Permit modification to shorten the applicable post-closure care period. The Secretary may shorten the post-closure care period if the Secretary finds the reduced period is sufficient to protect human health and the environment, as provided by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(a)(2)(i)). The Secretary may extend the applicable post-closure care period if the Secretary finds an extension is necessary to protect human health and the environment, as provided by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(a)(2)(ii)).

#### 7.3.1. Post-Closure Plan

The Permittees shall implement the Post-Closure Plan in Permit Attachment H and Permit Attachment H1 (Active Institutional Controls During Post-closure), as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(d), §264.118(b) and §264.603).

#### 7.3.2. Post-Closure Care and Monitoring

##### 7.3.2.1. General Monitoring, Inspection, and Maintenance Requirements

The Permittees shall monitor and perform inspections of the Underground HWDU closures and perform maintenance of the accessible bulkheads of the closures, as necessary. The Permittees shall monitor and maintain the components, structures and equipment of the waste containment systems at the facility as specified in Permit Attachments H and H1, and as

required by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(a)(1)(ii)).

7.3.2.2. Air Monitoring Requirements

The Permittees shall maintain ventilation and perform daily monitoring of the mine ventilation air downstream from closed Underground HWDUs at the beginning of days when work is to be performed downstream from the closed Underground HWDUs. The Permittees shall implement the Volatile Organic Compound Monitoring Plan in Permit Attachment N (Volatile Organic Compound Monitoring Plan) during the post-closure care period for closed Underground HWDUs, until six (6) months after the certification of closure of all Underground HWDUs, as specified in Permit Section 4.6.2. [20.4.1.500 NMAC (incorporating 40 CFR §264.117(a), §264.601 and §264.603)]

7.3.2.3. Detection Monitoring Program

The Permittees shall maintain and implement the Detection Monitoring Program during the post-closure care period as specified in Part 5 and Permit Attachment L (WIPP Ground-water Detection Monitoring Program Plan), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264 Subpart F and §264.117(a)(1)).

7.3.3. Security

The Permittees shall comply with the applicable post-closure security requirements as specified in Permit Attachments H and H1 and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(b)(2)).

7.3.4. Post-Closure Disturbance

The Permittees shall not allow any use of the facility surface area above the Underground HWDUs designated in Permit Section 7.2 which could disturb the integrity of the shaft sealing systems or any components of the waste containment system, or the function of the facility monitoring systems during the post-closure care period, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.117(c)), except as allowed under 20.4.1.500 NMAC (incorporating 40 CFR §264.117(c)(1) or (2)).

7.4. NOTICES AND CERTIFICATION

7.4.1. Disposal Unit Records

No later than 60 calendar days after certification of closure of each Underground HWDU, the Permittees shall submit to the Secretary and the local zoning authority, or the authority with jurisdiction over local land use, a record of the type, location, and quantity of TRU

mixed waste disposed in each Underground HWDU, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.119(a)).

#### 7.4.2. Deed Notice

Within 60 calendar days of certification of closure of the first Underground HWDU and within 60 calendar days of certification of the last Underground HWDU, the Permittees shall comply with the following conditions, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.119(b)):

##### 7.4.2.1. Deed Recordation

The Permittees shall record, in accordance with New Mexico law, a notation on the deed to the facility property, or on some other instrument that is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property that:

- (i) The land has been used to manage TRU mixed waste; and
- (ii) Its use is restricted under 20.4.1.500 NMAC (incorporating 40 CFR §264 Subpart G) regulations; and
- (iii) The survey plat and record of the type, location, and quantity of TRU mixed waste disposed in each Underground HWDU have been filed with the Secretary and the local zoning authority or the authority with jurisdiction over local land use.

##### 7.4.2.2. Certification

The Permittees shall submit a certification to the Secretary, signed by the Permittees, stating the Permittees have recorded the notation specified in Permit Section 7.4.2.1, including a copy of the document(s) in which the notation has been placed, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.119(b)).

#### 7.4.3. Removal of Wastes or Contaminated Soils

If the Permittees, or any subsequent owner or operator of the land upon which the Underground HWDUs are located, wishes to remove TRU mixed wastes, TRU mixed waste residues, or contaminated soils, they shall request a modification to this permit in accordance with the applicable requirements in 20.4.1.900 NMAC (incorporating 40 CFR Part 270) and 4.1.901. The Permittees or any subsequent owner or operator of the land shall demonstrate the removal of TRU mixed wastes will satisfy the criteria of 20.4.1.500 NMAC (incorporating 40 CFR §264.117(c) and §264.119(c)).

#### 7.4.4. Completion of Post-Closure Care

No later than 60 calendar days after completion of the post-closure care period for each Underground HWDU, the Permittees shall submit to the Secretary, by registered mail, a certification that the post-closure care for the Underground HWDU was performed in accordance with the specifications in the approved Post-Closure Plan, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.120). The Permittees and an independent New Mexico registered professional engineer shall sign the certification. The Permittees shall provide to the Secretary upon request the documentation supporting the professional engineer's certification, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.145(i) and §264.120).

#### 7.5. POST-CLOSURE PERMIT MODIFICATIONS

The Permittees shall submit a written notification of or request for a permit modification to amend the approved Post-Closure Plan at any time during the active life of the facility or during the post-closure care period, as required by 20.4.1.500, .900, and .901 NMAC (incorporating 40 CFR §§264.118(d) and 270). The Permittees shall include a copy of the proposed amended Post-Closure Plan for approval by the Secretary, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.118(d)).

##### 7.5.1. Changes Requiring a Permit Modification

Changes to the approved Post-Closure Plan which require a permit modification include, but are not limited to, the following circumstances specified in 20.4.1.500 NMAC (incorporating 40 CFR §264.118(d)(2)):

###### 7.5.1.1. Operating Plans

Whenever changes in operating plans or facility design affect the approved Post-Closure Plan; or

###### 7.5.1.2. Timing of Closure

Whenever there is a change in the expected year of final closure; or

###### 7.5.1.3. Other Events

Whenever other events occur during the active life of the facility, including partial or final closure, that affect the approved Post-Closure Plan.

##### 7.5.2. Timing of Permit Modification

The Permittees shall submit a written request for a permit modification at least 60 calendar days prior to the proposed change in facility design or operation, or no later than 60 calendar

days after an unexpected event has occurred which affects the Post-Closure Plan, as required by 20.4.1.500 NMAC (incorporating §264.118(d)(3)).

PERMIT ATTACHMENTS

~~Permit Attachment A2 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Geologic Repository” Appendix M2).~~

~~Permit Attachment H (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Post-Closure Plan” Chapter J).~~

~~Permit Attachment H1 (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Active Institutional Controls During Post-Closure” Appendix J1).~~

~~Permit Attachment L (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “WIPP Ground-water Detection Monitoring Program Plan” Chapter L).~~

~~Permit Attachment N (as modified from WIPP Hazardous Waste Facility Permit Amended Renewal Application, “Volatile Organic Compound Monitoring Plan” Chapter N).~~



**PART 8 - CORRECTIVE ACTION FOR SWMUS AND AOCS**

**PART 8 - CORRECTIVE ACTION FOR SWMUS AND AOCS**

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## **PART 8 - CORRECTIVE ACTION FOR SWMUS AND AOCS**

### 8.1. APPLICABILITY

The conditions of this Part apply to all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) identified in Permit Attachment K (Solid Waste Management Unit and Area of Concern Tables), any newly identified SWMUs and AOCs identified after the issuance of this Permit, and any releases of hazardous waste or hazardous constituents from SWMUs and AOCs.

### 8.2. CONTAMINATION BEYOND THE FACILITY BOUNDARY

The Permittees shall implement corrective action beyond the Facility boundary where necessary to protect human health and the environment, unless the Permittees demonstrate to the satisfaction of the Secretary that, despite the Permittees' best efforts, as determined by the Secretary, the Permittees were unable to obtain the necessary permission to undertake such actions. The Permittees are not relieved of all responsibility to cleanup a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. [20.4.1.500 NMAC (incorporating 40 CFR §264.101(c))]

### 8.3. CORRECTIVE ACTION ALREADY COMPLETED

Any corrective action tasks required under this Part that the Permittees have already completed may be used to meet the requirements of this Part, in whole or in part, as determined by the Secretary. The Permittees may submit prior work to meet these requirements for the Secretary's approval.

### 8.4. NOTIFICATION AND ASSESSMENT FOR NEWLY IDENTIFIED SWMUS AND AOCS

The Permittees shall notify the Secretary in writing, within 15 calendar days of discovery, of any newly discovered SWMU or AOC. The notification shall include, at a minimum, the location of the newly discovered SWMU or AOC and all available information pertaining to the site history and nature of the release (e.g., media affected, hazardous waste or hazardous constituents released, magnitude of release). The Secretary may require the Permittees to submit a Release Assessment Report in accordance with Permit Section 8.6.1 to determine the status of the newly discovered SWMU or AOC. Alternatively, the Secretary may require an Investigation Work Plan for the newly discovered SWMU or AOC in accordance with Permit Section 8.8.1 without requiring a Release Assessment. If the Secretary determines that an Investigation Work Plan for a newly discovered SWMU or AOC is required, the Permittees shall modify this Permit to add the SWMU or AOC to Permit Attachment K in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42).

### 8.5. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES FROM SWMUS OR AOCS

The Permittees shall notify the Secretary in writing, within 15 calendar days of discovery, of any newly discovered release(s) of hazardous waste or hazardous constituents from a SWMU or AOC that explains the location and circumstances of the release.

If the Secretary determines that investigation of the release is needed, the Permittees shall prepare and submit an Investigation Work Plan in accordance with Permit Section 8.8.1.

## 8.6. RELEASE ASSESSMENT

### 8.6.1. Release Assessment Report

If required by the Secretary, the Permittees shall submit a Release Assessment Report for newly discovered SWMUs or AOCs under this Permit Section. Any revisions to the Release Assessment Report required by the Secretary shall be submitted within 30 calendar days of receipt of the Secretary's comments on the Release Assessment Report.

The Release Assessment Report shall, at a minimum, include the following information:

1. Location of unit(s) on a topographic map of appropriate scale, as required under 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(19));
2. Designation of type and function of unit(s);
3. General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings);
4. Dates that the unit(s) was operated;
5. All available site history information;
6. Specifications of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous waste or hazardous constituents in the wastes; and
7. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include ground water data, soil analyses, air, and surface water data).

### 8.6.2. Requirement to Proceed

The Secretary will review the Release Assessment Report to determine whether any further investigative action is required. The Secretary will notify the Permittees of the need for confirmatory sampling if necessary, or notify the Permittees that an Investigation Work Plan is required in accordance with the requirements in Permit Section 8.8.1. The Secretary will notify the Permittees of any corrective action complete decision.

## 8.7. INTERIM MEASURES

### 8.7.1. Secretary-Initiated Interim Measures

Upon written notification by the Secretary, the Permittees shall prepare and submit an Interim Measures (**IM**) Work Plan at any SWMU or AOC where the Secretary determines

that interim measures are necessary to minimize or prevent the migration of hazardous waste or hazardous constituents and limit actual or potential human and environmental exposure to hazardous waste or hazardous constituents while long term corrective action remedies are evaluated and implemented. The Permittees shall submit its IM Work Plan to the Secretary within 30 calendar days of the Secretary's notification, unless another time period is specified by the Secretary. Such interim measures may be conducted concurrently with any required corrective action. The Permittees shall prepare and submit IM Work Plans in accordance with the work plan format included in Permit Section 8.14.

#### 8.7.2. Permittee-Initiated Interim Measures

The Permittees may initiate interim measures at a SWMU or AOC by notifying the Secretary, in writing, at least 30 calendar days prior to beginning the Interim Measures. The Secretary will approve the Permittee-initiated IM, conditionally approve the IM, or require submittal of an IM work plan for the Secretary's approval prior to implementation of the Interim Measure.

#### 8.7.3. Emergency Interim Measures

The Permittees may determine, during implementation of site investigation activities, that emergency interim measures are necessary to address an immediate threat of harm to human health or the environment. The Permittees shall notify the Secretary within one business day of discovery of the facts giving rise to the threat, and shall propose emergency interim measures to address the threat. If the Secretary approves the emergency interim measures in writing, the Permittees may implement the proposed emergency interim measures without submitting an interim measures work plan. If circumstances arise resulting in an immediate threat to human health or the environment such that initiation of emergency interim measures are necessary prior to obtaining written approval from the Secretary, the Permittees shall notify the Secretary within one business day of taking the emergency interim measure. The notification shall contain a description of the emergency situation, the types and quantities of contaminants involved, the emergency interim measures taken, and contact information for the emergency coordinator who handled the situation. The notification shall also include a written statement justifying the need to take the emergency action without prior written approval from the Secretary. This requirement shall not be construed to conflict with 20.4.1.500 NMAC (incorporating 40 CFR §264.1(g)(8)) or 20.4.1.900 NMAC (incorporating 40 CFR §270.61).

#### 8.7.4. IM Work Plan Requirements

The IM Work Plan shall ensure that the interim measures are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with, and integrated into, any final corrective measures at the Facility. The IM Work Plan shall include the interim measures objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.



### 8.7.5. Interim Measures Implementation

#### 8.7.5.1. Implementation and Completion of Approved IM Work Plan

The Permittees shall implement interim measures required under Permit Section 8.7 in accordance with the Secretary-approved IM Work Plan. The Permittees shall complete interim measures within 180 calendar days of the start of implementation of the interim measure. The Permittees may submit a written request to the Secretary to extend the period for implementation of the interim measure. The request must provide justification for the extension and a proposed schedule for completion of the interim measure. The Secretary will notify the Permittees, in writing, of the approval or disapproval of the request within 30 calendar days of receipt of the IM implementation extension request.

#### 8.7.5.2. Notification of Changes

The Permittees shall give notice to the Secretary as soon as possible of any planned changes, reductions or additions to the IM Work Plan required by the Secretary under Permit Section 8.7.1 or initiated by the Permittees in accordance with Permit Section 8.7.2.

### 8.7.6. Interim Measures Reports

The Permittees shall submit to the Secretary for review and approval, within 90 calendar days of completion of interim measures, an IM Report for each SWMU or AOC. The IM Report shall contain, at a minimum, the following information:

1. A description of interim measures implemented;
2. Summaries of results;
3. Summaries of all problems encountered during IM investigations;
4. Summaries of accomplishments and/or effectiveness of interim measures; and,
5. Copies of all relevant laboratory/monitoring data, maps, logs, and other related information.

## 8.8. CORRECTIVE ACTION INVESTIGATIONS

### 8.8.1. Investigation Work Plan

#### 8.8.1.1. Investigation Work Plan Submittal

The Permittees shall submit to the Secretary Investigation Work Plans for the SWMUs and AOCs identified in Permit Attachment K, Table K-1

“Solid Waste Management Units (SWMUs) & Areas of Concern (AOCs) Requiring Corrective Action.”

8.8.1.2. Investigation Work Plan Requirements

Investigation Work Plans shall meet the requirements specified in Permit Section 8.14.1. Investigation Work Plans shall include schedules of implementation and completion of specific actions necessary to determine the nature and extent of contamination and the potential pathways of contaminant releases to the air, soil, surface water, and ground water. The Permittees shall provide sufficient justification and associated documentation that a release is not probable or has already been characterized if a unit or a media/pathway associated with a unit (ground water, surface water, soil, subsurface gas, or air) is not included in an Investigation Work Plan. Such deletions of a unit, medium, or pathway from the work plan(s) are subject to the approval of the Secretary. The Permittees shall provide sufficient written justification for any omissions or deviations from the minimum requirements specified in Permit Section 8.14.1. Such omissions or deviations are subject to the approval of the Secretary. In addition, Investigation Work Plans shall include all investigations necessary to ensure compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.101).

8.8.1.3. Historical Documents

The Permittees shall submit to the Secretary a summary of the historical information and assessment of potential contaminant releases relating to each SWMU or AOC in conjunction with the unit-specific Investigation Work Plan including complete, legible copies of all associated photographic imprints, maps, figures, drawings, tables, attachments, enclosures, appendices and other relevant supporting documentation.

8.8.2. Investigation Work Plan Implementation

The Permittees shall implement Investigation Work Plans as approved by the Secretary. The Permittees shall notify the Secretary at least 30 calendar days prior to any permit or corrective action-related field activity (e.g., drilling, sampling).

8.8.3. Corrective Action Investigation Reports

The Permittees shall prepare and submit to the Secretary Investigation Reports for the investigations conducted in accordance with Investigation Work Plans submitted under Permit Section 8.8.1. The Permittees shall submit the Investigation Reports to the Secretary for review and approval in accordance with the schedules included in its approved Investigation Work Plans.

The Investigation Reports shall include an analysis and summary of all required investigations of SWMUs and AOCs. The summary shall describe the type and extent of contamination at each SWMU and AOC investigated, including sources and migration pathways, identify all hazardous waste or constituents present in all media, and describe actual or potential receptors. The Investigation Report shall also describe the extent of contamination (qualitative and quantitative) in relation to background levels of the area. If the Investigation Report concludes that further work is necessary, the report shall include a schedule for submission of a work plan for the next phase of investigation.

#### 8.8.3.1. Cleanup Levels

The Investigation Reports shall identify the applicable cleanup levels in accordance with Permit Section 8.13 for each hazardous waste or hazardous constituent found at each SWMU and AOC. The Permittees shall propose in the Investigation Report or in a subsequent Risk Assessment or Corrective Measures Evaluation appropriate cleanup levels for those hazardous wastes or hazardous constituents without established cleanup levels based upon human and ecological risk.

#### 8.8.3.2. Requirement to Proceed

Based upon the Secretary's review of the Investigation Report, the Secretary will notify the Permittees of the need for further investigative action, if necessary, and inform the Permittees, if not already notified, of the need for a Corrective Measures Study. The Secretary will notify the Permittees if corrective action is complete. If the Secretary determines that further investigation is necessary, the Secretary will require the Permittees to submit a work plan for approval that includes a proposed schedule for additional investigation(s).

### 8.9. RISK ASSESSMENT

The Permittees shall attain the cleanup goals outlined in Permit Section 8.13 including, as necessary, performance of risk analysis to establish alternate cleanup goals, at each site for which the Secretary determines, in the format included in Permit Section 8.14, that corrective measures are necessary. The Permittees shall submit to the Secretary for approval a Risk Assessment Report in accordance with this Permit Section for sites where risk analyses are conducted.

### 8.10. CORRECTIVE MEASURES EVALUATION

#### 8.10.1. General

the Secretary will require corrective measures at a SWMU or AOC if the Secretary determines, based on the Investigation Report and other relevant information available to the Secretary, that there has been a release of contaminants into the environment at the SWMU or AOC and that corrective action is necessary to protect human health or the environment from such a release. Upon making such a determination, the Secretary will notify the

Permittees in writing. The Secretary will specify a date for the submittal of the necessary reports and evaluations in the written notification.

#### 8.10.2. Corrective Measures Evaluation Report

Following written notification from the Secretary that a corrective measures evaluation is required, the Permittees shall submit to the Secretary for approval a Corrective Measures Evaluation Report. The Permittees shall follow the Corrective Measures Evaluation Report format outlined in Permit Section 8.14.5. The corrective measures evaluation shall evaluate potential remedial alternatives and shall recommend a preferred remedy that will be protective of human health and the environment and that will attain the appropriate cleanup goals. The Corrective Measures Evaluation Report shall, at a minimum, comply with Permit Section 8.14.5 and include the following:

1. A description of the location, status, and current use of the site;
2. A description of the history of site operations and the history of releases of contaminants;
3. A description of site surface conditions;
4. A description of site subsurface conditions;
5. A description of on- and off-site contamination in all affected media;
6. An identification and description of all sources of contaminants;
7. An identification and description of contaminant migration pathways;
8. An identification and description of potential receptors;
9. A description of cleanup standards or other applicable regulatory criteria;
10. An identification and description of a range of remedy alternatives;
11. Remedial alternative pilot or bench scale testing results;
12. A detailed evaluation and rating of each of the remedy alternatives, applying the criteria set forth in Permit Section 8.14.5.10;
13. An identification of a proposed preferred remedy or remedies;
14. Design criteria of the selected remedy or remedies; and
15. A proposed schedule for implementation of the preferred remedy.

### 8.10.3. Cleanup Standards

The Permittees shall select corrective measures that are capable of achieving the cleanup standards and goals outlined in Permit Section 8.13 including, as applicable, approved alternate cleanup goals established by a risk assessment.

### 8.10.4. Remedy Evaluation Criteria

#### 8.10.4.1. Threshold Criteria

The Permittees shall evaluate each of the remedy alternatives for the following threshold criteria. To be selected, the remedy alternative must:

1. Be protective of human health and the environment;
2. Attain media cleanup standards;
3. Control the source or sources of releases so as to reduce or eliminate, to the extent practicable, further releases of contaminants that may pose a threat to human health and the environment; and
4. Comply with applicable standards for management of wastes.

#### 8.10.4.2. Remedial Alternative Evaluation Criteria

The Permittees shall evaluate each of the remedy alternatives for the factors described in this Permit Section. These factors shall be balanced in proposing a preferred alternative.

##### a. Long-term Reliability and Effectiveness

The remedy shall be evaluated for long-term reliability and effectiveness. This factor includes consideration of the magnitude of risks that will remain after implementation of the remedy; the extent of long-term monitoring, or other management that will be required after implementation of the remedy; the uncertainties associated with leaving contaminants in place; and the potential for failure of the remedy. Permittees shall give preference to a remedy that reduces risks with little long-term management, and that has proven effective under similar conditions.

##### b. Reduction of Toxicity, Mobility, or Volume

The remedy shall be evaluated for its reduction in the toxicity, mobility, and volume of contaminants. Permittees shall give preference to remedy that uses treatment to more completely and permanently reduce the toxicity, mobility, and volume of contaminants.

c. Short-term Effectiveness

The remedy shall be evaluated for its short-term effectiveness. This factor includes consideration of the short-term reduction in existing risks that the remedy would achieve; the time needed to achieve that reduction; and the short-term risks that might be posed to the community, workers, and the environment during implementation of the remedy. The Permittees shall give preference to a remedy that quickly reduces short-term risks, without creating significant additional risks.

d. Implementability

The remedy shall be evaluated for its implementability or the difficulty of implementing the remedy. This factor includes consideration of installation and construction difficulties; operation and maintenance difficulties; difficulties with cleanup technology; permitting and approvals; and the availability of necessary equipment, services, expertise, and storage and disposal capacity. Permittees shall give preference to a remedy that can be implemented quickly and easily, and poses fewer and lesser difficulties.

e. Cost

The remedy shall be evaluated for its cost. This factor includes a consideration of both capital costs, and operation and maintenance costs. Capital costs shall include, without limitation, construction and installation costs; equipment costs; land development costs; and indirect costs including engineering costs, legal fees, permitting fees, startup and shakedown costs, and contingency allowances. Operation and maintenance costs shall include, without limitation, operating labor and materials costs; maintenance labor and materials costs; replacement costs; utilities; monitoring and reporting costs; administrative costs; indirect costs; and contingency allowances. All costs shall be calculated based on their net present value. Permittees shall give preference to a remedy that is less costly, but does not sacrifice protection of health and the environment.

8.10.5. Approval of Corrective Measures Evaluation Report

Subject to the procedures in Permit Section 1.10.2, if the Secretary disapproves the Corrective Measures Evaluation Report, the Secretary will notify the Permittees in writing of the Corrective Measures Evaluation Report's deficiencies and specify a due date for submission of a revised Corrective Measures Evaluation Report. Upon receipt of such notification of disapproval, the Permittees shall submit to the Secretary, within the specified

time, a revised Corrective Measures Evaluation Report that corrects the deficiencies. If the Secretary approves the Corrective Measures Evaluation Report, the Secretary will notify the Permittees in writing.

#### 8.10.6. Relationship to Corrective Action Requirements

The Corrective Measures Evaluation shall serve as a Corrective Measures Study for the purposes of RCRA compliance. *See* 55 Fed. Reg. 30875-77 (July 27, 1990) (proposed 20.4.1.500 NMAC (incorporating 40 CFR §264.520-264.524).

#### 8.10.7. Statement of Basis

Upon approval of the Corrective Measures Evaluation Report, the Secretary will select a remedy or remedies for the SWMU or AOC. The Secretary may choose a different remedy from that recommended by the Permittees. The Secretary will issue a Statement of Basis for selection of the remedy, and will receive public comment on the remedy. The public comment period will extend for at least 45 days from the date of the public notice of the Statement of Basis. The Secretary will provide an opportunity for a public hearing on the remedy, at which all interested persons will be given a reasonable chance to submit data, views or arguments orally or in writing and to examine witnesses testifying at the hearing. The comment period will automatically be extended to the close of the public hearing. The public hearing will follow the hearing requirements specified in 20.4.1.901.F NMAC. The Secretary will select a final remedy and issue a response to public comments to all commenters, after the end of the public comment period. In selecting a remedy, the Secretary will follow the public participation requirements applicable to remedy selection specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.41) and 20.4.1.901 NMAC.

The administrative record for the Facility will be made available to the public for review at the Secretary's offices in Santa Fe, New Mexico. All significant written and signed comments, including emailed comments, will be considered by the Secretary prior to approving a final remedy or remedies.

The Secretary's decision on the final remedy or remedies shall follow the requirements specified in 20.4.1.901 NMAC, Secretary's Decision. The Secretary will issue a response to public comments at the time of the Secretary's final decision.

### 8.11. CORRECTIVE MEASURES IMPLEMENTATION

#### 8.11.1. General

The Permittees shall implement the final remedy selected by the Secretary.

#### 8.11.2. Corrective Measures Implementation Plan

Within 90 days after the Secretary's selection of a final remedy, or as otherwise specified by the schedule contained in the approved Corrective Measure Evaluation Report or as specified by a schedule required by the Secretary in the written approval notification, the

Permittees shall submit to the Secretary for approval a Corrective Measures Implementation Plan outlining the design, construction, operation, maintenance, and performance monitoring for the selected remedy, and a schedule for its implementation. The implementation plan shall be submitted to the Secretary for review in accordance with the procedures in Permit Section 1.10. The Corrective Measures Implementation Plan shall, at a minimum, include the following elements:

1. A description of the selected final remedy;
2. A description of the cleanup goals and remediation system objectives;
3. An identification and description of the qualifications of all persons, consultants, and contractors that will be implementing the remedy;
4. Detailed engineering design drawings and systems specifications for all elements of the remedy signed and stamped by a registered New Mexico professional engineer;
5. A construction work plan;
6. An operation and maintenance plan;
7. The results of any remedy pilot tests;
8. A plan for monitoring the performance of the remedy, including sampling and laboratory analysis of all affected media;
9. A waste management plan;
10. A proposed schedule for submission to the Secretary of periodic progress reports;  
and
11. A proposed schedule for implementation of the remedy.

#### 8.11.3. Health and Safety Plan

The Permittees shall conduct all activities in accordance with a site-specific or Facility-wide Health and Safety Plan during all construction, operation, maintenance, and monitoring activities conducted during corrective measures implementation.

#### 8.11.4. Progress Reports

The Permittees shall submit progress reports to the Secretary in accordance with the schedule approved in the Corrective Measures Implementation Plan. The progress reports shall, at a minimum, include the following information:

1. A description of the remedy work completed during the reporting period;



2. A summary of problems, potential problems, or delays encountered during the reporting period;
3. A description of actions taken to eliminate or mitigate the problems, potential problems, or delays;
4. A discussion of the remedy work projected for the next reporting period, including all sampling events;
5. Copies of the results of all monitoring, including sampling and analysis, and other data generated during the reporting period; and
6. Copies of all waste disposal records generated during the reporting period.

#### 8.11.5. Remedy Completion

##### 8.11.5.1. Remedy Completion Report

Within 90 days after completion of remedy, the Permittees shall submit to the Secretary a Remedy Completion Report. The report shall, at a minimum, include the following items:

1. A summary of the work completed;
2. A statement, signed by a registered professional engineer, that the remedy has been completed in accordance with the Secretary approved work plan for the remedy;
3. As-built drawings and specifications signed and stamped by a registered New Mexico professional engineer;
4. Copies of the results of all monitoring, including sampling and analysis, and other data generated during the remedy implementation, if not already submitted in a progress report;
5. Copies of all waste disposal records, if not already submitted in a progress report; and
6. A certification, signed by a responsible official of facility, stating: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.”

## 8.12. ACCELERATED CLEANUP PROCESS

If the Permittees identify a corrective action or measure that, if implemented voluntarily, will reduce risks to human health and the environment to levels acceptable to the Secretary, will reduce cost and/or will achieve cleanup of a SWMU or AOC ahead of schedule, the Permittees may implement the corrective measure as provided in this Permit Section, in lieu of the process established in Permit Sections 8.7 through 8.11. The accelerated cleanup process shall be used at sites to implement presumptive remedies at small-scale and relatively simple sites where groundwater contamination is not a component of the accelerated cleanup, where the remedy is considered to be the final remedy for the site, and where the field work will be accomplished within 180 days of the commencement of field activities.

The Permittees shall notify the Secretary of the planned accelerated corrective action or measure a minimum of 30 days prior to the commencement of any accelerated field activity. The notification shall include the submittal of the Plan if not already submitted to the Secretary.

### 8.12.1. Accelerated Corrective Measures Work Plan

The proposed accelerated cleanup will be documented in an Accelerated Corrective Measure Work Plan, which shall include:

1. A description of the proposed remedial action, including details of the unit or activity that is subject to the requirements of this Permit;
2. An explanation of how the proposed cleanup action is consistent with the overall corrective action objectives and requirements of this Permit,
3. The methods and procedures for characterization and remediation sample collection and analyses, and
4. A schedule for implementation and reporting on the proposed cleanup action.

The Permittees shall obtain the Secretary’s approval of an Accelerated Corrective Measures Work Plan prior to implementation. The Permittees shall prepare the Work Plan in general accordance with the requirements of Permit Section 8.14. The Permittees shall include an implementation schedule in the revised Accelerated Corrective Measures Work Plan.

### 8.12.2. Accelerated Corrective Measures Implementation

Upon approval by the Secretary, the Permittees shall implement the accelerated corrective measures in accordance with the approved Accelerated Corrective Measures Work Plan. Within 90 days of completion of the accelerated corrective measures, the Permittees shall submit to the Secretary for approval a Remedy Completion Report in a format approved by the Department in accordance with Permit Section 8.14. If upon review, the Secretary

determines that applicable cleanup levels were not achieved during corrective measures implementation or that there were deficiencies in the accelerated corrective measures implementation or reporting, the Secretary will notify the Permittees in writing.

### 8.13. CLEANUP LEVELS

The Permittees shall attain the cleanup levels specified below when implementing the closure and corrective action requirements of this Permit.

#### 8.13.1. Ground Water Cleanup Levels

The Permittees shall attain the following cleanup levels for all hazardous waste and hazardous constituents in ground water:

1. For any contaminant for which the Environmental Protection Agency (EPA) has adopted a maximum contaminant level (MCL) for drinking water under 40 CFR parts 141 and 143, the MCL shall be the cleanup level;
2. For any contaminant for which the New Mexico Water Quality Control Commission (WQCC) has adopted numeric standards for ground water listed in 20.6.2.3103 NMAC, the ground water standard shall be the cleanup level; and
3. For any contaminant that the WQCC has identified as a toxic pollutant listed in 20.6.2.7. ~~T(2)WW~~ NMAC, the level approved by the New Mexico Environment Department (NMED) under paragraph 2 or 3 below shall be the cleanup level.

For any contaminant for which more than one of the cleanup levels set forth in subparagraphs 1, 2, and 3 above would apply, the lowest (or otherwise most protective) level shall be the applicable cleanup level.

If a cleanup level under Item 1 above does not exist for a carcinogenic hazardous waste or hazardous constituent, then the Permittees shall use the lower of levels listed in most recent version of the EPA *Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs)* and NMED's Risk Assessment Guidance for Site Investigation and Remediation (as updated) for tap water and a target excess cancer risk level of  $10^{-5}$  to develop a proposed cleanup level for NMED approval. The Permittees may use other scientific or regulatory information currently available to the public to develop and propose a cleanup level for NMED approval provided that the level is lower (or otherwise more protective) than the RSL.

If a cleanup level under Item 1 above does not exist for a noncarcinogenic hazardous waste or hazardous constituent, then the Permittees shall use the most recent version of the EPA RSLs for tap water and a Hazard Index (HI) of one (1.0) to develop a proposed cleanup level for NMED approval. The Permittees may use other scientific or regulatory information currently available to the public to develop and propose a cleanup level for NMED approval provided that the level is lower (or otherwise more protective) than the RSL.

If perchlorate is detected at concentrations at or greater than 4 µg/L and no ground water standard or MCL has been adopted by the Environmental Improvement Board, WQCC, or EPA, then the Permittees shall use the cleanup goal with a HI of 1.0 to develop the proposed cleanup level for use in their site investigation or corrective measure evaluation.

#### 8.13.2. Soil Cleanup Levels

The Permittees shall attain the following cleanup levels for hazardous waste and hazardous constituents in soil:

1. For all individual contaminants for which NMED has specified a soil screening level in NMED's *Risk Assessment Guidance for Site Investigation and Remediation (as updated) Technical Background Document for Development of Soil Screening Levels*, the residential or industrial land use scenario cleanup level shall be the screening level specified in the most recent version of that document. The method for determining cleanup levels for sites with multiple contaminants shall follow NMED's *Risk Assessment Guidance for Site Investigation and Remediation Technical Background Document for Development of Soil Screening Levels* (as updated) and items 2 and 3 below, as applicable;
2. The Permittees shall propose a soil cleanup level for PCBs based on NMED's *Position Paper Risk-based Remediation of Polychlorinated Biphenyls at RCRA Corrective Action Sites* (March 2000 as updated); and
3. If NMED soil screening level has not been established for a hazardous waste or hazardous constituent, the Permittees shall propose for NMED approval, a cleanup level based on the most recent version of the EPA Region VI HHMSSL (based on a HI of one (1.0) for compounds designated as "n" (noncarcinogen effects), "max" (maximum concentration), and "sat" (soil saturation concentration), or ten times the EPA Region VI HHMSSL for compounds designated "c" (carcinogen effects) (i.e. a target excess cancer risk level of  $10^{-5}$ ).

#### 8.13.3. Land Use Determination

All soil cleanup levels shall be based on a residential land use scenario unless NMED determines that an alternate land use is appropriate (e.g. subsistence farming, cultural, or industrial). The Permittees may only propose an alternate land use with less stringent cleanup levels (e.g. industrial) if NMED or EPA can legally and practicably enforce the institutional controls limiting the land use. If an alternate land use for which NMED or EPA has not established soil cleanup levels is determined to be the current and reasonably foreseeable future land use, then the Permittees may propose cleanup levels based on a risk assessment using a target excess cancer risk level of  $10^{-5}$  for carcinogenic hazardous waste or hazardous constituent or, for noncarcinogenic hazardous waste or hazardous constituent, a HI of one (1.0).

#### 8.13.4. Surface Water Cleanup Levels

The Permittees shall comply with the surface water quality standards outlined in the Clean Water Act (33 U.S.C. §§1251 to 1387), the New Mexico WQCC Regulations (20.6.2 NMAC), the State of New Mexico Standards for Interstate and Intrastate Surface Waters (20.6.4 NMAC) and the procedures for alternative abatement standards (20.6.2.4103 NMAC).

#### 8.13.5. Ecological Risk Cleanup Levels

The Permittees shall derive cleanup levels for each hazardous waste and hazardous constituent for each ecological zone at the Facility using the methodology in NMED's *Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment* (July 2008, as updated). If the ecological risk evaluation indicates that a lower cleanup level for a hazardous waste or hazardous constituent in ground water, soil, or surface water is necessary to protect environmental receptors, NMED may establish cleanup levels based on ecological risk for hazardous waste or hazardous constituents in ground water, soil, or surface water that are lower than levels that are solely protective of human health.

#### 8.13.6. Background Concentrations

If the naturally occurring (background) concentration of a hazardous waste or hazardous constituent in ground water, soil, or surface water exceeds the standards specified above, then the cleanup level shall be the background concentration. To use background concentration as a cleanup level, the Permittees must obtain a written background determination from NMED.

#### 8.13.7. Variance from Cleanup Levels

The Permittees may seek a variance from a cleanup level for soil or ground water as follows:

##### 8.13.7.1. WQCC Standards

The Permittees may seek a technical infeasibility determination or alternative abatement standard from a WQCC standard in accordance with 20.6.2.4103.E or F NMAC.

##### 8.13.7.2. Soil Standards and Non-WQCC Ground Water Standards

The Permittees may seek a variance from any cleanup level for soil or for ground water (other than a WQCC standard) by submitting a written request to NMED for a determination that attainment of the cleanup level is technically infeasible or otherwise impracticable due to conflict with other environmental laws or requirements for the preservation of cultural resources. If based on technical infeasibility, the request shall include a demonstration of technical or physical impossibility of attaining the

cleanup level using potential corrective action remedies. If based on conflict with other environmental laws or requirements for the preservation of cultural resources, the request shall include documentation showing that Permittees have attempted to resolve the conflict or mitigate the impact on cultural or natural resources and shall explain why mitigating measures cannot resolve the conflict or adequately protect the cultural or natural resource (e.g. consultation and a determination of incidental taking or reasonable and prudent measures to minimize the impact under 16 U.S.C. §1536). All requests shall include a discussion of the effectiveness of potential corrective action remedies, whether the proposed variance will allow a present or future hazard to public health or the environment, and any other information required by the NMED. In addition, the request shall propose alternate cleanup levels for NMED approval, based on the effectiveness of potential corrective action remedies and a site-specific risk assessment based on NMED's guidance, *Technical Background Document for Development of Soil Screening Levels* (August 2009, as updated), *Assessing Human Health Risks Posed by Chemicals: Screening Level Risk Assessment* (March 2000), and *Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment* (July 2008, as updated).

#### 8.14. REPORTING REQUIREMENTS

The purpose of this Permit Section is to provide the reporting requirements and report formats for corrective action activities at all SWMUs, AOCs, and permitted units required under this Permit. This Section is not intended to provide reporting requirements for every potential corrective action conducted at the facility; therefore, the formats for all types of reports are not presented below. The described formats include the general reporting requirements and formats for site-specific investigation work plans, investigation reports, periodic monitoring reports, risk assessment reports, and corrective measures evaluations. The Permittees shall generally consider the reports to be the equivalents of RCRA Facility Investigation (**RFI**) work plans, RFI reports, periodic monitoring reports, risk assessments, Corrective Measures Study (**CMS**) plans, and CMS reports, for the purposes of RCRA compliance. The Permittees shall include detailed, site-specific requirements in all SWMU, AOC, permitted unit and facility-wide investigation work plans, investigation reports, monitoring reports, and corrective measures evaluations. All plans and reports shall be prepared with technical and regulatory input from NMED. All work plans, reports and other documents shall be submitted to NMED in the form of two paper copies and one copy in electronic or other format acceptable to NMED. The Permittees shall submit maps and figures in a format specified by NMED (e.g., \*.shp, \*.dwg).

The reporting requirements listed in this Section do not include all sections that may be necessary to complete each type of report listed and may include sections that are not relevant for a specific site action. The Permittees or NMED may determine that additional sections may be needed to address additional site-specific issues or information collected during corrective action or monitoring activities not listed below. However, the Permittees must submit variations of the general report format and the formats for reports not listed in this Section in outline form to NMED for approval

prior to submittal of the reports. All work plans and reports are subject to the requirements in this Permit Part. NMED will approve or disapprove, in writing, the proposed report outline within 90 days of receipt of the outline. If NMED disapproves the report outline, NMED will notify the Permittees, in writing, of the outline's deficiencies and will specify a date for submittal of a revised report outline. All reports submitted by the Permittees shall follow the general approach and limitations for data presentation described in this Section.

#### 8.14.1. Investigation Work Plan

The Permittees shall prepare work plans subject to the requirements of this Permit Part for site investigations or corrective action activities at the facility using the general outline below. The minimum requirements for describing proposed activities within each section are included. All research, locations, depths and methods of exploration, field procedures, analytical results, data collection methods, and schedules shall be included in each work plan. In general, interpretation of data acquired during previous investigations shall be presented only in the background sections of the work plans. The other text sections of the work plans shall be reserved for presentation of anticipated site-specific activities and procedures relevant to the project. The general work plan outline is described below.

##### 8.14.1.1. Title Page

The title page shall include the type of document; facility name; area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the name and title of the responsible facility representative shall be provided on the title page in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1)).

##### 8.14.1.2. Executive Summary (Abstract)

The executive summary or abstract shall provide a brief summary of the purpose and scope of the investigation to be conducted at the subject site. The facility, SWMU or AOC name, site name, any other unit name, location, and area designation shall be included in the executive summary.

##### 8.14.1.3. Table of Contents

The table of contents shall list all text sections, tables, figures, and appendices or attachments included in the work plan. The corresponding page numbers for the titles of each section of the work plan shall be included in the table of contents.

##### 8.14.1.4. Introduction

The introduction shall include the facility name, area designation, unit location, and unit status (e.g., closed, corrective action). General



information on the current site usage and status shall be included in this section. A brief description of the purpose of the investigation and the type of site investigation to be conducted shall be provided in this section.

#### 8.14.1.5. Background

The background section shall describe relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features. The locations of pertinent subsurface features such as pipelines, underground tanks, utility lines, and other subsurface structures shall be included in the background summary and labeled on the figure, unless none exist.

This section shall identify potential receptors, including groundwater, and include a brief summary of the type and characteristics of all waste and all contaminants managed or released at the site, the known and possible sources of contamination, the history of releases or discharges of contamination, and the known extent of contamination. This section shall include brief summaries of results of previous investigations, if conducted, including references to pertinent figures, data summary tables, and text in previous reports. At a minimum, detections of contaminants encountered during previous investigations shall be presented in table format, with an accompanying figure showing sample locations. References to previous reports shall include page, table, and figure numbers for referenced information. Summary data tables and site plans showing relevant investigation locations shall be included in the Tables and Figures sections of the document, respectively.

#### 8.14.1.6. Site Conditions

##### a. Surface Conditions

A section on surface conditions shall provide a brief detailed description of current site topography, features and structures including a description of topographic drainages, man-made drainages, vegetation, erosional features, and basins. It shall also include a detailed description of current site usage and any current operations at the site. In addition, descriptions of features located in surrounding sites that may have an impact on the subject site regarding sediment transport, surface water runoff, or contaminant fate and transport shall be included in this section.

##### b. Subsurface Conditions



A section on subsurface conditions shall provide a brief, detailed description of the site conditions observed during previous subsurface investigations, including relevant soil horizons, stratigraphy, presence of groundwater, and other relevant information. A site plan showing the locations of all borings and excavations advanced during previous investigations shall be included in the Figures section of the work plan. A brief description of the anticipated stratigraphic units that may be encountered during the investigation may be included in this subsection if no previous investigations have been conducted at the site.

8.14.1.7. Scope of Activities

A section on the scope of activities shall briefly describe a list of all anticipated activities to be performed during the investigation including background information research, health and safety requirements that may affect or limit the completion of tasks, drilling, test pit or other excavations, well construction, field data collection, survey data collection, chemical analytical testing, aquifer testing, remediation system pilot tests, and investigation-derived waste (**IDW**) storage and disposal.

8.14.1.8. Investigation Methods

A section on investigation methods shall provide a description of all anticipated locations and methods for conducting the activities to be performed during the investigation. This section shall include research methods, health and safety practices that may affect the completion of tasks, drilling methods, test pit or other excavation methods, sampling intervals and methods, well construction methods, field data collection methods, geophysical and land survey methods, field screening methods, chemical analytical testing, materials testing, aquifer testing, pilot tests, and other proposed investigation and testing methods. This information may also be summarized in table format, if appropriate.

8.14.1.9. Monitoring and Sampling

A section on monitoring and sampling shall provide a description of the groundwater, ambient air, subsurface vapor, remediation system, engineering controls, and other monitoring and sampling programs currently being implemented at the site.

8.14.1.10. Schedule

A section shall set forth the anticipated schedule for completion of field investigation, pilot testing, and monitoring and sampling activities. In addition, this section shall set forth a schedule for submittal of reports and

data to NMED including a schedule for submitting all status reports and preliminary data.

#### 8.14.1.11. Tables

The following summary tables may be included in the investigation work plans, if previous investigations have been conducted at the site. Data presented in the tables shall include information on dates of data collection, analytical methods, detection limits, and significant data quality exceptions. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

1. Summaries of regulatory criteria, background, and applicable cleanup levels (may be included in the analytical data tables instead of as separate tables).
2. Summaries of historical field survey location data.
3. Summaries of historical field screening and field parameter measurements of soil, rock, sediments, groundwater, surface water, and air quality data.
4. Summaries of historical soil, rock, or sediment laboratory analytical data shall include the analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data.
5. Summaries of historical groundwater elevation and depth to groundwater data. The table shall include the monitoring well depths, the screened intervals in each well, and the dates and times measurements were taken.
6. Summaries of historical groundwater laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data.
7. Summary of historical surface water laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data.
8. Summary of historical air sample screening and chemical analytical data. The data tables shall include the screening instruments used, laboratory analytical methods, detection limits,

and significant data quality exceptions that could influence interpretation of the data.

9. Summary of historical pilot or other test data, if applicable, including units of measurement and types of instruments used to obtain measurements.

#### 8.14.1.12. Figures

The following figures shall be included with each investigation work plan for each site, including presentation of data where previous investigations have been conducted. All figures must include an accurate bar scale and a north arrow. An explanation shall be included on each figure for all abbreviations, symbols, acronyms, and qualifiers. All maps shall contain a date of preparation.

1. A vicinity map showing topography and the general location of the site relative to surrounding features and properties.
2. A site plan that presents pertinent site features and structures, underground utilities, well locations, and remediation system locations and details. Off-site well locations and other relevant features shall be included on the site plan, if appropriate. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features.
3. Figures showing historical and proposed soil boring or excavation locations and sampling locations.
4. Figures presenting historical soil sample field screening and laboratory analytical data if applicable.
5. Figures presenting the locations of all existing and proposed borings and vapor monitoring well locations.
6. Figures showing all existing and proposed wells and piezometers, presenting historical groundwater elevation data, and indicating groundwater flow directions.
7. Figures presenting historical groundwater laboratory analytical data, if applicable. The chemical analytical data corresponding to each sampling location can be presented in tabular form on the figure or as an isoconcentration map.
8. Figures presenting historical and proposed surface water sample locations and field measurement data, if applicable.

9. Figures presenting historical surface water laboratory analytical data, if applicable.
10. Figures showing historical and proposed air or vapor sampling locations and presenting historical air quality data, if applicable.
11. Figures presenting historical pilot and other testing locations and data, where applicable, including site plans and graphic data presentation.
12. Figures presenting geologic cross-sections, based on outcrop and borehole data acquired during previous investigations, if applicable.

#### 8.14.1.13. Appendices

A description of IDW management shall be included as an appendix to the investigation work plan. The results of historical investigations required in this Permit shall be submitted with the investigation work plan as a separate document. Additional appendices may be necessary to present additional data or documentation not listed above.

#### 8.14.2. Investigation Report

The Permittees shall prepare investigation reports at the facility using the general outline below. The Investigation Report shall be the reporting mechanism for presenting the results of completed Investigation Work Plans. This section describes the minimum requirements for reporting on site investigations. All data collected during each site investigation event in the reporting period shall be included in the reports. In general, interpretation of data shall be presented only in the background, conclusions and recommendations sections of the reports. The other text sections of the reports shall be reserved for presentation of facts and data without interpretation or qualifications. The general report outline is provided below.

##### 8.14.2.1. Title Page

The title page shall include the type of document; facility name; area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the name and title of the responsible facility representatives shall be provided on the title page in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1)).

##### 8.14.2.2. Executive Summary (Abstract)

The executive summary or abstract shall provide a brief summary of the purpose, scope, and results of the investigation; site names; location; and area designation. In addition, this section shall include a brief summary of

conclusions included in the Report based on the investigation data collected and recommendations for future investigation, monitoring, remedial action or site closure.

8.14.2.3. Table of Contents

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the report. The corresponding page numbers for the titles of each section of the report shall be included in the table of contents.

8.14.2.4. Introduction

The introduction section shall include the facility name, area designation, unit location, and unit status (e.g., closed, corrective action). General information on the site usage and status shall be included in this section. A brief description of the purpose of the investigation, the type of site investigation conducted, and the type of results presented in the report also shall be provided in this section.

8.14.2.5. Background

The background section shall describe relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features. The locations of any subsurface features such as pipelines, underground tanks, utility lines, and other subsurface structures shall be included in the background summary and labeled on the figure, as appropriate. In addition, this section shall include a brief summary of the possible sources of contamination, the history of releases or discharges of contamination, the known extent of contamination, and a general summary of the results of previous investigations including references to previous reports. The references to previous reports shall include page, table, and figure numbers for referenced information. A site plan, showing relevant investigation locations, and summary data tables shall be included in the Figures and Tables sections of the document, respectively.

8.14.2.6. Scope of Activities

A section on the scope of activities shall briefly describe all activities performed during the investigation event including background information research, implemented health and safety measures that affected or limited the completion of tasks, drilling, test pit or other excavation methods, well construction methods, field data collection,

survey data collection, chemical analytical testing, aquifer testing, remediation system pilot tests, and IDW storage or disposal.

#### 8.14.2.7. Field Investigation Results

A section shall provide a summary of the procedures used and the results of all field investigation activities conducted at the site including the dates that investigation activities were conducted, the type and purpose of field investigation activities performed, field screening measurements, logging and sampling results, pilot test results, construction details, and conditions observed. Field observations or conditions that altered the planned work or may have influenced the results of sampling, testing, and logging shall be reported in this section. The following sections shall be included.

##### a. Surface Conditions

A section on surface conditions shall describe current site topography, features, and structures including topographic drainages, man-made drainages, vegetation, and erosional features. It shall also include a description of current site uses and any operations at the site. In addition, descriptions of features located in surrounding sites that may have an impact on the subject site regarding sediment transport, surface water runoff, or contaminant transport shall be included in this subsection.

##### b. Exploratory Drilling or Excavation Investigations

A section shall describe the locations, methods, and depths of subsurface explorations. The description shall include the types of equipment used, the logging procedures, the soil or rock classification system used to describe the observed materials, exploration equipment decontamination procedures, and conditions encountered that may have affected or limited the investigation.

A description of the site conditions observed during subsurface investigation activities shall be included in this section, including soil horizon and stratigraphic information. Site plans showing the locations of all borings and excavations shall be included in the Figures Section of the report. Boring and test pit logs for all exploratory borings and test pits shall be presented in an appendix or attachment to the report.

##### c. Exploratory and Monitoring Well Boring Geophysical Logging

A section shall describe the methods, dates of measurement, depth intervals measured, and the results of geophysical logging. The relative merits and limitations of each geophysical logging method employed shall be discussed, along with any field conditions or instrument malfunctions that occurred that may have affected the results of the geophysical logging.

d. Subsurface Conditions

A section on subsurface conditions shall describe known subsurface lithology and structures, based on observations made during the current and previous subsurface investigations, including interpretation of geophysical logs and as-built drawings of man-made structures. A description of any known locations of pipelines and utility lines and observed geologic structures shall also be included in this section. A site plan showing boring and excavation locations and the locations of the site's above- and below-ground structures shall be included in the Figures section of the report. In addition, cross-sections shall be constructed, if appropriate, to provide additional visual presentation of site or regional subsurface conditions.

e. Monitoring Well construction and Boring or Excavation Abandonment

A section shall describe the methods and details of monitoring well construction and the methods used to abandon or backfill exploratory borings and excavations. The description shall include the dates of well construction, boring abandonment, or excavation backfilling. In addition, well construction diagrams shall be included in an appendix or attachment with the associated boring logs for monitoring well borings. The Permittees may submit well abandonment reports as an appendix to the investigation report.

f. Groundwater Conditions

A section shall describe groundwater conditions observed beneath the subject site and relate local groundwater conditions to regional groundwater conditions. A description of the depths to water, aquifer thickness, and groundwater flow directions shall be included in this section for alluvial groundwater, shallow perched groundwater, intermediate perched groundwater, and regional groundwater, as appropriate to the investigation. Figures showing well locations, surrounding area, and groundwater elevations and flow directions for each hydrologic zone shall be included in the Figures section of the report.

g. Surface Water Conditions

A section shall describe surface water conditions and include a description of surface water runoff, drainage, surface water sediment transport, and contaminant transport in surface water as suspended load and as a dissolved phase in surface water via natural and man-made drainages, if applicable. A description of contaminant fate and transport shall be included, if appropriate.

h. Surface Air and Subsurface Vapor Conditions

A section shall describe surface air and subsurface vapor monitoring and sampling methods used during the site investigation. It shall also describe observations made during the site investigation regarding subsurface flow pathways and the subsurface air-flow regime.

i. Materials Testing Results

A section shall discuss the materials testing results, such as core permeability testing, grain size analysis, or other materials testing results. Sample collection methods, locations, and depths shall also be included. Corresponding summary tables shall be included in the Tables section of the report.

j. Pilot Testing Results

A section shall discuss the results of any pilot tests. Pilot tests are typically conducted after initial subsurface investigations are completed and the need for additional investigation or remediation has been evaluated. Pilot tests, including aquifer tests and remediation system pilot tests, shall be addressed through separate work plans and pilot test reports. The format for pilot test work plans and reports shall be approved by NMED prior to submittal.

8.14.2.8. Regulatory Criteria

A section shall set forth the cleanup standards, risk-based screening levels, and risk-based cleanup goals for each pertinent medium at the subject site. The appropriate cleanup levels for each site shall be included if site-specific levels have been established at separate facility sites or units. A table summarizing the applicable cleanup standards or levels or inclusion of applicable cleanup standards or levels in the data tables shall be included as part of the document. The risk assessment, if conducted, shall be presented in a separate document or in an appendix to this report. If cleanup or screening levels calculated in a NMED-approved risk evaluation are employed, the risk evaluation document shall be



referenced and shall include pertinent page numbers for referenced information.

#### 8.14.2.9. Site Contamination

A section shall provide a description of sampling intervals and methods for detection of surface and subsurface contamination in soils, rock, sediments, groundwater, and surface water, and as vapor-phase contamination. Only factual information shall be included in this section. Interpretation of the data shall be reserved for the summary and conclusions sections of the report. Tables summarizing all sampling, testing, and screening results for detected contaminants shall be prepared in a format approved by NMED. The tables shall be presented in the Tables Section of the report.

##### a. Soil, Rock, and Sediment Sampling

A section shall describe the sampling of soil, rock, and sediment. It shall include the dates, locations and methods of sample collection; sampling intervals; sample logging methods; screening sample selection methods; and laboratory sample selection methods including the collection depths for samples submitted for laboratory analyses. A site plan showing the sample locations shall be included in the Figures Section of the report.

##### b. Soil, Rock, and Sediment Sampling Field Screening Results

A section shall describe the field screening methods used during the investigation and the field screening results. Field screening results also shall be presented in summary tables in the Tables section of the document. The limitations of field screening instrumentation and any conditions that influenced the results of field screening shall be discussed in this section.

##### c. Soil, Rock, and Sediment Sampling Analytical Results

A section shall summarize the results of laboratory analysis for soil, rock, and sediment samples. It shall also describe the analytical methods used and provide a comparison of the analytical results to background levels, cleanup standards, or established cleanup levels for the site. The laboratory results also shall be presented in summary tables in the Tables section of the document. Field conditions and sample collection methods that could potentially affect the analytical results shall be described in this section. If appropriate, soil analytical data shall be presented with sample locations on a site plan and included in the Figures section of the report.

d. Groundwater Sampling

A section on groundwater sampling shall describe the dates, locations, depths, and methods of sample collection; methods for sample logging; and methods for screening and laboratory sample selection. A map showing all site and surrounding area well locations shall be included in the Figures section of the report.

e. Groundwater General Chemistry

A section on the general groundwater chemistry shall describe the results of measurement of field purging parameters and field analytical measurements. Field parameter measurements and field analytical results also shall be presented in summary tables in the Tables section of the document. The limitations of field measurement instrumentation and any conditions that may have influenced the results of field screening shall be discussed in this section. As determined by the Permittees and NMED, relevant water chemistry concentrations shall be presented as data tables or as isoconcentration contours on a map included in the Figures section of the report.

f. Groundwater Chemical Analytical Results

A section shall summarize the results of groundwater chemical analyses. It shall describe the groundwater chemical analytical methods and analytical results. It shall also provide a comparison of the data to cleanup standards or established cleanup levels for the site. The rationale or purpose for altering or modifying the groundwater sampling program outlined in the site investigation work plan shall also be provided in this section. Field conditions shall be described in this section that may have affected the analytical results during sample collection. Tables summarizing the groundwater laboratory, field, and field sample QA/QC chemical analytical data; applicable cleanup levels; and modifications to the groundwater sampling program shall be provided in the Tables Section of the report. Relevant contaminant concentrations shall be presented as individual analyte concentrations, data tables, or as isoconcentration contours on a map included in the Figures Section of the report.

g. Surface Water Sampling

A section shall describe the surface water sampling and shall include the dates, times, locations, depths, and methods of sample collection. It shall also describe methods for sample logging, sample-screening methods, and laboratory sample selection

methods. A map showing all surface-water sampling locations shall be included in the Figures section of the report.

h. Surface Water General Chemistry

A section on the surface water general chemistry shall describe the results of measurement of field parameters and field analytical measurements. Field parameter measurements and field analytical results also shall be presented in summary tables in the Tables section of the document. The limitations of field measurement instrumentation and any conditions that influenced the results of field screening shall be discussed in this section. Relevant water chemistry concentrations shall be presented as data tables on a map included in the Figures section of the report.

i. Surface Water Chemical Analytical Results

A section shall summarize the results of surface water chemical analyses. It shall describe the analytical methods and analytical results, and provide a comparison of the data to the cleanup standards or established background or cleanup levels for the site. The rationale or purpose for altering or modifying the surface-water sampling program outlined in the site investigation work plan also shall be provided in this section. Field conditions that may have affected the analytical results during sample collection shall be described in this section. Tables summarizing the surface water laboratory, field, and analytical field sample QA/QC analytical data; applicable cleanup levels; and modifications to the surface-water sampling program shall be provided in the Tables section of the report. Relevant contaminant concentrations shall be presented as individual analyte concentrations or as data tables on a map included in the Figures section of the report.

j. Air and Subsurface Vapor Sampling

A section shall describe the air and subsurface vapor sampling. It shall describe the dates, locations, depths or elevations above ground surface, methods of sample collection, methods for sample logging, and methods for laboratory sample selection. A map showing all air sampling locations shall be provided in the Figures section of the report.

k. Air and Subsurface Vapor Field Screening Results

A section shall describe the air and subsurface vapor field screening results. It shall describe the field screening methods used for ambient air and subsurface vapors during the

investigation. Field screening results shall also be presented in summary tables in the Tables section of the report. The locations of ambient air and subsurface vapor screening sample collection shall be presented on a site plan included in the Figures section of the report. The limitations of field screening instrumentation and any conditions that influenced the results of field screening shall be discussed in this section.

1. Air and subsurface Vapor Laboratory Analytical Results

A section shall describe the results of air and subsurface vapor laboratory analysis. It shall describe the air sampling laboratory analytical methods and analytical results, and provide a comparison of the data to emissions standards or established cleanup or emissions levels for the site. The rationale or purpose for altering or modifying the air monitoring or sampling program outlined in the site investigation work plan also shall be provided in this section. Field conditions that may have affected the analytical results during sample collection shall be described in this section. Tables summarizing the air sample laboratory, field, and analytical field sample QA/QC data; applicable cleanup levels or emissions standards; and modifications to the air sampling program shall be provided in the Tables section of the report. Relevant contaminant concentrations shall be presented as individual analyte concentrations, data tables, or as isoconcentration contours on a map included in the Figures section of the report.

8.14.2.10. Conclusions

A section shall provide a brief summary of the investigation activities and a discussion of the conclusions of the investigation conducted at the site. In addition, this section shall provide a comparison of the results to applicable cleanup or screening levels, and to relevant historical investigation results and analytical data. Potential receptors, including groundwater, shall be identified and discussed. An explanation shall be provided with regard to data gaps. A risk assessment may be included as an appendix to the investigation report; however, the risk assessment shall be presented in the Risk Assessment format described in Permit Section 8.14.4. References to the risk assessment shall be presented only in the summary and conclusions sections of the Investigation Report.

8.14.2.11. Recommendations

A section shall discuss the need for further investigation, corrective measures, risk assessment and monitoring, or recommendations for corrective action completed, based on the conclusions provided in the

Conclusions section. It shall include explanations regarding additional sampling, monitoring, and site closure. A corresponding schedule for further action regarding the site shall also be provided. No action recommendations shall include the anticipated schedule for submittal of a petition for a permit modification.

#### 8.14.2.12. Tables

A section shall provide the following summary tables as applicable. With prior approval from NMED, the Permittees may combine one or more of the tables. Data presented in the tables shall include the current data, dates of data collection, analytical methods, detection limits, and significant data quality exceptions. The summary analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

1. Tables summarizing regulatory criteria, background levels, and applicable cleanup levels (this information may be included in the analytical data tables instead of as separate tables).
2. Tables summarizing field survey location data. Separate tables shall be prepared for well locations and individual medium sampling locations except where the locations are the same for more than one medium.
3. Tables summarizing field screening and field parameter measurements of soil, rock, sediments, groundwater, surface water, and air quality data.
4. A table summarizing soil, rock, and/or sediment laboratory analytical data. It shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
5. A table summarizing the groundwater elevations and depths to groundwater. The table shall include the monitoring well depths and the screened intervals in each well.
6. A table summarizing the groundwater laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
7. A table summarizing the surface water laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.

8. A table summarizing the air sample screening and laboratory analytical data. The data tables shall include the screening instruments used, laboratory analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
9. Tables summarizing the pilot test data, if applicable, including units of measurement and types of instruments used to obtain measurements.
10. A table summarizing any materials test data.

#### 8.14.2.13. Figures

A section shall provide the following figures as applicable. All figures shall include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers. All maps shall have a date.

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features and properties.
2. A site plan that presents any pertinent site features and structures, underground utilities, well locations, and remediation system location(s) and details. Off-site well locations and other relevant features shall be included on the site plan. Additional site plans may be required to present the locations of relevant off-site well locations, structures and features.
3. Figures showing boring or excavation locations and sampling locations.
4. Figures presenting soil sample field screening and laboratory analytical data.
5. Figures displaying the locations of all newly installed and existing wells and borings.
6. Figures presenting monitoring well and piezometer locations, groundwater elevation data, and groundwater flow directions.
7. Figures presenting groundwater laboratory analytical data, including any past data requested by NMED. The laboratory analytical data corresponding to each sampling location may be presented in table form on the figure or as an isoconcentration map.

8. Figures presenting surface water sample locations and field measurement data including any past data requested by NMED.
9. Figures presenting surface water laboratory analytical data including any past data requested by NMED. The laboratory analytical data corresponding to each sampling location may be presented in table form on the figure.
10. Figures showing air sampling locations and presenting air quality. The field screening or laboratory analytical data corresponding to each sampling location may be presented in table form on the figure or as an isoconcentration map.
11. Figures presenting geologic cross-sections based on outcrop and borehole data.
12. Figures presenting pilot test locations and data, where applicable, including site plans or graphic data presentation.

#### 8.14.2.14. Appendices

Each investigation report shall include the following appendices. Additional appendices may be necessary to present data or documentation not listed below.

##### a. Field Methods

An appendix shall provide detailed descriptions of the methods used to acquire field measurements of each medium that was surveyed or tested during the investigation. This appendix shall include exploratory drilling or excavation methods, the methods and types of instruments used to obtain field screening, field analytical or field parameter measurements, instrument calibration procedures, sampling methods for each medium investigated, decontamination procedures, sample handling procedures, documentation procedures, and a description of field conditions that affected procedural or sample testing results. Methods of measuring and sampling during pilot tests shall be reported in this appendix, if applicable. Geophysical logging methods shall be discussed in a separate section of this appendix. IDW storage and disposal methods shall also be discussed in this appendix. Copies of IDW disposal documentation shall be provided in a separate appendix.

##### b. Boring/Test Pit Logs and Well Construction Diagrams

An appendix shall provide boring logs, test pit logs, or other excavation logs, and well construction details. In addition, a key to symbols and a soil or rock classification system shall be included in this appendix. Geophysical logs shall be provided in a separate section of this appendix.

c. Analytical Programs

An appendix shall discuss the analytical methods, a summary of data quality objectives, and the data quality review procedures. A summary of data quality exceptions and their effect on the acceptability of the field and laboratory analytical data with regard to the investigation and the site status shall be included in this appendix along with references to the case narratives provided in the laboratory reports.

d. Analytical Reports

An appendix shall provide the contract laboratory final analytical data reports generated for the investigation. The reports shall include all chain-of-custody records and Level II QA/QC results provided by the laboratory. The final laboratory reports and data tables shall be provided electronically in a format approved by NMED. Paper copies (or electronically scanned in PDF format) of all chain-of-custody records shall be provided with the reports.

e. Other Appendices

Other appendices containing additional information shall be included as required by NMED or as otherwise appropriate.

### 8.14.3. Periodic Monitoring Report

The Permittees shall use the following guidance for preparing periodic monitoring reports. The reports shall present the reporting of periodic groundwater, surface water, vapor, and remediation system monitoring at the facility. The following sections provide a general outline for monitoring reports, and also provide the minimum requirements for reporting for specific facility sites, areas, and regional monitoring. All data collected during each monitoring and sampling event in the reporting period shall be included in the reports. In general, interpretation of data shall be presented only in the background, conclusions, and recommendations sections of the reports. The other text sections of the reports shall be reserved for presentation of facts and data without interpretation or qualifications.

#### 8.14.3.1. Title Page

The title page shall include the type of document; facility name; area designation; SWMU or AOC name, site, watershed, and any other unit



name; and the submittal date. A signature block providing spaces for the name and title of the responsible facility representatives shall be provided on the title page in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1)).

8.14.3.2. Executive Summary (Abstract)

The executive summary or abstract shall provide a brief summary of the purpose, scope, and results of the monitoring conducted at the subject site during the reporting period. The area (e.g., Plume-front, facility-wide) SWMU, AOC and site name, location, and/or area designation shall be included in the executive summary. In addition, this section shall include a brief summary of conclusions based on the monitoring data collected.

8.14.3.3. Table of Contents

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the report. The corresponding page numbers for the titles of each section of the report shall be included in the table of contents.

8.14.3.4. Introduction

The introduction section shall include the facility name, area designation physical area and/or, unit location, and unit status as applicable (e.g. closed, corrective action). General information on the site usage and status shall be included in this section. A brief description of the purpose of the monitoring, type of monitoring conducted, and the type of results presented in the report also shall be provided in this section.

8.14.3.5. Scope of Activities

A section on the scope of activities shall briefly describe all activities performed during the monitoring event or reporting period including field data collection, analytical testing, remediation system monitoring, if applicable, and purge/decontamination water storage and disposal.

8.14.3.6. Regulatory Criteria

A section on regulatory criteria shall provide information regarding applicable cleanup standards, risk-based screening levels and risk-based cleanup goals for the subject site. A separate table summarizing the applicable screening levels or standards or inclusion of the applicable cleanup standards or screening levels in the data tables can be substituted for this section. The appropriate cleanup or screening levels for each site shall be included, if site-specific levels have been established at separate sites. Risk-based evaluation procedures, if used to calculate cleanup or

screening levels, must either be included as an attachment or referenced. The specific document and page numbers must be included for all referenced materials.

8.14.3.7. Monitoring Results

A section shall provide a summary of the results of monitoring conducted at the site. This section shall include the dates and times that monitoring was conducted, the measured depths to groundwater, directions of groundwater flow, field air and water quality measurements, contaminant surveys, static pressures, field measurements, and a comparison to previous monitoring results. Field observations or conditions that may influence the results of monitoring shall be reported in this section. Tables summarizing vapor-monitoring parameters, groundwater elevations, depths to groundwater measurements, and other field measurements can be substituted for this section. The tables shall include all information required in Permit Section 8.14.3.11.

8.14.3.8. Analytical Data Results

A section shall discuss the results of the chemical analyses. It shall provide the dates of sampling, the analytical methods, and the analytical results. It shall also provide a comparison of the data to previous results and to background levels, cleanup standards, or established cleanup levels for the site. The rationale or purpose for altering or modifying the monitoring and sampling program shall be provided in this section. A table summarizing the laboratory analytical data, QA/QC data, applicable cleanup levels, and modifications to the sampling program can be substituted for this section. The tables shall include all information required in Permit Section 8.14.3.11.

8.14.3.9. Remediation System Monitoring

A section shall discuss the remediation system monitoring. It shall summarize the remediation system's capabilities and performance. It shall also provide monitoring data, treatment system discharge sampling requirements, and system influent and effluent sample analytical results. The dates of operation, system failures, and modifications made to the remediation system during the reporting period shall also be included in this section. A summary table may be substituted for this section. The tables shall include all information required in Permit Section 8.14.3.11.

8.14.3.10. Summary

A summary section shall provide a discussion and conclusions of the monitoring conducted at the site. In addition, this section shall provide a comparison of the results to applicable cleanup levels, and to relevant

historical monitoring and laboratory analytical data. An explanation shall be provided with regard to data gaps. A discussion of remediation system performance, monitoring results, modifications, if applicable, and compliance with discharge requirements shall be provided in this section. Recommendations and explanations regarding future monitoring, remedial actions, or site closure, if applicable, shall also be included in this section.

#### 8.14.3.11. Tables

A section shall provide the following summary tables for the media sampled. With prior approval from NMED, the Permittees may combine one or more of the tables. Data presented in the tables shall include the current sampling and monitoring data plus data from the three previous monitoring events or, if data from less than three monitoring events is available, data acquired during previous investigations. Remediation system monitoring data also shall be presented. The dates of data collection shall be included in the tables. Summary tables may be substituted for portions of the text. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

1. A table summarizing the regulatory criteria (a Regulatory Criteria text section may be substituted for this table or the applicable cleanup levels may be included in the analytical data tables).
2. A table summarizing groundwater elevations and depths to groundwater data. The table shall include the monitoring well depths, the screened intervals in each well, and the dates and times of measurements.
3. A table summarizing field measurements of surface water quality data.
4. A table summarizing field measurements of vapor monitoring data (must include historical vapor monitoring data as described above).
5. A table summarizing field measurements of groundwater quality data (must include historical water quality data as described above).
6. A table summarizing vapor sample analytical data (must include historical vapor sample analytical data as described above).
7. A table summarizing surface water analytical data (must include historical surface water analytical data as described above).

8. A table summarizing groundwater analytical data (must include historical groundwater analytical data as described above).
9. A table summarizing remediation system monitoring data, if applicable

#### 8.14.3.12. Figures

The section shall include the following figures. All figures shall include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers. All figures shall have a date.

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features or properties.
2. A site plan that presents pertinent site features and structures, well and piezometer locations, and remediation system location(s) and features. Off-site well locations and pertinent features shall be included on the site plan, if practical. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features.
3. Figures presenting the locations of piezometer, monitoring and other well locations, groundwater elevation data, and groundwater flow directions.
4. Figures presenting groundwater analytical data for the current monitoring event. The analytical data corresponding to each sampling location may be presented as individual concentrations or in table form on the figure or as an isoconcentration map.
5. Figures presenting surface water sampling locations and analytical data for the current monitoring period if applicable.
6. Figures presenting vapor sampling locations and analytical data for the current monitoring event if applicable. The analytical data corresponding to each sampling location may be presented as individual concentrations or in table form on the figure or as an isoconcentration map.
7. Figures presenting geologic cross-sections based on outcrop and borehole data, if applicable.

#### 8.14.3.13. Appendices

Each monitoring report shall include the following appendices. Additional appendices may be necessary to present data or documentation not listed below.

a. Field Methods

An appendix shall include the methods used to acquire field measurements of groundwater elevations, vapor and water quality data, and vapor, surface water and groundwater samples. It shall include the methods and types of instruments used to measure depths to water, air or headspace parameters, flow measurements, and water quality parameters. In addition, decontamination, well purging techniques, well sampling techniques, and sample handling procedures shall be provided in this appendix. Methods of measuring and sampling remediation systems shall be reported in this appendix, if applicable. Purge and decontamination water storage and disposal methods shall also be presented in this appendix. Copies of purge and decontamination water disposal documentation shall be provided in a separate appendix, if applicable.

b. Analytical Programs

An appendix shall discuss the analytical program. It shall include the analytical methods, a summary of data quality objectives, and data quality review procedures. A summary of data quality exceptions and their effect on the acceptability of the analytical data with regard to the monitoring event and the site status shall be included in this appendix along with references to case narratives provided in the laboratory reports.

c. Analytical Reports

An appendix shall provide the analytical reports and shall include the contract laboratory final chemical analytical data reports generated during this reporting period. The reports must include all chain-of-custody records and Level II QA/QC results provided by the laboratory. The laboratory final reports and data tables shall be provided electronically in a format approved by NMED. Paper copies (or electronically scanned in PDF format) of all chain-of-custody records shall be provided with the reports.

#### 8.14.4. Risk Assessment Report

The Permittees shall prepare risk assessment reports for sites requiring corrective action at the facility using the format listed below. This section provides a general outline for risk assessments and also lists the minimum requirements for describing risk assessment elements. In general, interpretation of data shall be presented only in the Background, Conceptual Site Model, and Conclusions and Recommendations Sections of the reports. The other text sections of the Risk Assessment report shall be reserved for presentation of sampling results from all investigations, conceptual and mathematical elements of the risk assessment, and presentations of toxicity information and screening values used in the risk assessment. Permit Section 8.14.4.8 and subsequent sections should be presented in separate sections for the human health and ecological risk assessments, but the general risk assessment outline applicable to both sections is provided below.

##### 8.14.4.1. Title Page

The title page shall include the type of document; facility name; area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the name and title of the responsible facility representative shall be provided on the title page in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1)).

##### 8.14.4.2. Executive Summary (Abstract)

The executive summary or abstract section shall provide a brief summary of the purpose and scope of the risk assessment of the subject site. The Executive Summary shall also briefly summarize the conclusions of the risk assessment. The facility, SWMU, AOC, and site names; location; and area designation shall be included in the executive summary.

##### 8.14.4.3. Table of Contents

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the risk assessment. The corresponding page numbers for the titles of each unit of the report shall be included in the table of contents.

##### 8.14.4.4. Introduction

The introduction section shall include the facility name, area designation, unit location, and unit status (e.g., closed, corrective action). General information on the current site usage and status shall be included in this section.

#### 8.14.4.5. Background

The background section shall describe relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features.

##### a. Site Description

A section shall describe current site topography, features and structures including topographic drainages, man-made drainages, erosional features, current site uses, and other data relevant to assessing risk at the site. Depth to groundwater and direction of groundwater flow shall be included in this section. The presence and location of surface water bodies such as any springs or wetlands shall be noted in this section. Photographs of the site may be incorporated into this section. Ecological features of the site shall be described here, including type and amount of vegetative cover, observed and expected wildlife receptors, and level of disturbance of the site. A topographical map of the site and vicinity of the site showing habitat types, boundaries of each habitat, and any surface water features shall be included in the Figures section of the document.

##### b. Sampling Results

A section shall discuss the results of the sampling at the site. It shall include a description of the history of releases of contaminants, the known and possible sources of contamination, and the vertical and lateral extent of contamination present in each medium. This section shall include summaries of sampling results of all investigations including site plans (included in the Figures section of the report) showing locations of detected contaminants. This section shall reference pertinent figures, data summary tables, and references in previous reports. References to previous reports shall include page, table, and figure numbers for referenced information. Summaries of sampling data shall include for each constituent: the maximum value detected, the detection limit, the 95 percent upper confidence level (UCL) of the mean value detected (if applicable to the data set), and whether the 95 percent UCL of the mean was calculated based on a normal or lognormal distribution. Background values used for comparison to inorganic constituents at the site shall be presented here. The table of background values should appear in the Tables section of the

document and include actual values used as well as the origin of the values (e.g. facility-wide, UCL, upper tolerance level (UTL)). This section shall also include a discussion of how “non-detect” sample results were handled in the averaging of data.

#### 8.14.4.6. Conceptual Site Model

A section shall present the conceptual site model. It shall include information on the expected fate and transport of contaminants detected at the site. This section shall provide a list of all sources of contamination at the site. Sources that are no longer considered to be ongoing but represent the point of origination for contaminants transported to other locations shall be included. The discussion of fate and transport shall address potential migration of each contaminant in each medium, potential breakdown products and their migration, and anticipated pathways of exposure for human or ecological receptors. Diagrammatic representations of the conceptual site model shall appear in the Figures section of the document.

For human health risk assessments, the conceptual site model shall include the current and reasonably foreseeable future land use and residential land use for all risk assessments. All values for exposure parameters and the source of those values shall be included in table format and presented in the Tables section of the document.

Conceptual site models presented for ecological risk assessments shall identify assessment endpoints and measurement receptors for the site. The discussion of the model shall explain how the measurement receptors for the site are protective of the wildlife receptors identified by the Permittees in the Site Description section (see Permit Section 8.14.4.5.a).

#### 8.14.4.7. Risk Screening Levels

A section shall present the actual screening values used for each contaminant for comparison to all human health and ecological risk screening levels. NMED’s Soil Screening Levels (SSLs) for residential and industrial soil shall be used to screen soil for human health using EPA’s *Risk Assessment Guidance for Superfund (RAGS), Volume I, Part A, 1989* as updated. For those contaminants not appearing on NMED’s SSL table, the EPA Region 6 soil screening value adjusted to meet NMED’s risk goal of  $10^{-5}$  for total risk for carcinogens shall be used to screen the site for human health risks. Screening for ecological risk shall be conducted using EPA’s ECO-SSLs, or derive a screening level using the methodology in NMED’s *Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment* (July 2008, as updated). If no valid toxicological studies exist for a particular receptor or contaminant, the contaminant/receptor combination shall be



addressed using qualitative methods. If a NMED approved site-specific risk scenario is used for the human health risk assessment, this section shall include all toxicity information and exposure assessment equations used for the site-specific scenario as well as the sources for that information. Other regulatory levels applicable to screening the site, such as drinking water MCLs, shall also be included in this section.

#### 8.14.4.8. Risk Assessment Results

A section shall present all risk values, hazard quotients (**HQs**), and HIs for human health based on current and reasonably foreseeable future land use. Where the current or reasonably foreseeable future land use is not residential, risk values, HQs, and HIs for a residential land use scenario shall also be calculated and reported. The residential scenario shall be used for comparison purposes only, unless the land use becomes residential. This section shall also present the HQ and HI for each contaminant for each ecological receptor.

##### a. Uncertainty Analysis

A section shall include discussion of qualitative, semi-quantitative, and quantitative uncertainty in the risk assessment and estimate the potential impact of the various uncertainties.

#### 8.14.4.9. Conclusions and Recommendations

A section shall include the interpretation of the results of the risk assessment and any recommendations for future disposition of the site. This section may include additional information and considerations that the Permittees believe are relevant to the analysis of the site.

#### 8.14.4.10. Tables

A section shall provide the following summary tables, as appropriate. With prior approval from NMED, the Permittees may combine one or more of the tables. Data presented in the summary tables shall include information on detection limits and significant data quality exceptions. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

1. A table presenting background values used for comparison to inorganic constituents at the site. The table shall include actual values used as well as the origin of the values (facility-wide, UCL, UTL, or maximum).
2. A table summarizing sampling data shall include, for each constituent, all detected values above background, the maximum

value detected, the 95 percent UCL of the mean value detected (if applicable to the data set), and whether that 95 percent UCL of the mean was calculated based on a normal or lognormal distribution.

3. A table of all screening values used and the sources of those values.
4. A table presenting all risk values, HQs, and HIs under current and reasonably foreseeable future land use for human health.
5. If residential use is not a current or reasonably foreseeable future land use, a table presenting all risk values, HQs, and HIs under a residential land use scenario for human health shall be included for comparison purposes.
6. A table presenting the HQ and HI for each contaminant for each ecological receptor.
7. A table presenting values for exposure parameters and the source of the values.

#### 8.14.4.11. Figures

A section shall present the following figures for each site, as appropriate. With prior approval from NMED, the Permittees may combine one or more of the figures. All figures shall include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers.

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features or properties.
2. For human health risk assessments, a site plan that presents pertinent site features and structures, underground utilities, well locations, and remediation system location(s) and its details. Off-site well locations and other relevant features shall be included on the site plan if practical. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features.
3. For ecological risk assessments, a topographical map of the site and vicinity of the site showing habitat types, boundaries of each habitat, and any surface water features.
4. Conceptual site model diagrams for both human health and ecological risk assessments.

#### 8.14.4.12. Appendices

Each risk assessment report shall include appendices containing supporting data. Appendices may include the results of statistical analyses of data sets and comparisons of data, full sets of results of all sampling investigations at the site, or other data as appropriate.

#### 8.14.5. Corrective Measures Evaluation Report

The Permittees shall prepare corrective measures evaluations for sites requiring corrective measures using the format listed below. This section provides a general outline for corrective measures evaluations and also lists the minimum requirements for describing corrective measures when preparing these documents. All investigation summaries, site condition descriptions, corrective action goals, corrective action options, remedial options selection criteria, and schedules shall be included in the corrective measures evaluations. In general, interpretation of historical investigation data and discussions of prior interim activities shall be presented only in the background sections of the corrective measures evaluations. At a minimum, detections of contaminants encountered during previous site investigations shall be presented in the corrective measures evaluations in table format with an accompanying site plan showing sample locations. The other text sections of the corrective measures evaluations shall be reserved for presentation of corrective action-related information regarding anticipated or potential site-specific corrective action options and methods relevant to the project. The general corrective measures evaluation outline is provided below.

##### 8.14.5.1. Title Page

The title page shall include the type of document; facility name; area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the name and title of the responsible facility representative shall be provided on the title page in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1)).

##### 8.14.5.2. Executive Summary (Abstract)

This executive summary or abstract shall provide a brief summary of the purpose and scope of the corrective measures evaluation to be conducted at the subject site. The executive summary or abstract shall also briefly summarize the conclusions of the evaluation. The SWMU, AOC, and site names, location, and area designation shall be included in the executive summary.

##### 8.14.5.3. Table of Contents

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the corrective

measures evaluation. The corresponding page numbers for the titles of each section of the report shall be included in the table of contents.

#### 8.14.5.4. Introduction

The Introduction section shall include the facility name, area designation, site location, and site status (e.g. closed, corrective action). General information on the current site usage and status shall be included in this section. A brief description of the purpose of the corrective measures evaluation and the corrective action objectives for the project also shall be provided in this section.

#### 8.14.5.5. Background

The Background section shall describe the relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features. The locations of any subsurface features such as pipelines, underground tanks, utility lines, and other subsurface structures shall be included in this section and labeled on the site plan, as appropriate.

This section shall include contaminant and waste characteristics, a brief summary of the history of contaminant releases, known and possible sources of contamination, and the vertical and lateral extent of contamination present in each medium. This section shall include brief summaries of results of previous investigations, including references to pertinent figures, data summary tables, and text in previous reports. References to previous reports shall include page, table, and figure numbers for referenced information. Summary tables and site plans showing relevant investigation locations shall be referenced and included in the Tables and Figures sections of the document, respectively.

#### 8.14.5.6. Site Conditions

##### a. Surface Conditions

A section on surface conditions shall describe current and historic site topography, features, and structures, including a description of topographic drainages, man-made drainages, vegetation, and erosional features. It shall also include a description of current uses of the site and any current operations at the site. This section shall also include a description of those features that could potentially influence corrective action option selection or implementation such as archeological sites, wetlands, or other

features that may affect remedial activities. In addition, descriptions of features located in surrounding sites that may have an effect on the subject site regarding sediment transport, surface water runoff or contaminant transport shall be included in this section. A site plan displaying the locations of all pertinent surface features and structures shall be included in the Figures section of the corrective measures evaluation.

b. Subsurface Conditions

A section on subsurface conditions shall describe the site conditions observed during previous subsurface investigations. It shall include relevant soil horizon and stratigraphic information, groundwater conditions, fracture data, and subsurface vapor information. A site plan displaying the locations of all borings and excavations advanced during previous investigations shall be included in the Figures section of the corrective measures evaluation. A brief description of the stratigraphic units anticipated to be present beneath the site may be included in this section if stratigraphic information is not available from previous investigations conducted at the site.

8.14.5.7. Potential Receptors

a. Sources

A section shall provide a list of all sources of contamination at the subject site where corrective measures are to be considered or required. Sources that are no longer considered to be releasing contaminants at the site, but may be the point of origination for contaminants transported to other locations, shall be included in this section.

b. Pathways

A section shall describe potential migration pathways that could result in either acute or chronic exposures to contaminants. It shall include such pathways as utility trenches, paleochannels, surface exposures, surface drainages, stratigraphic units, fractures, structures, and other features. The migration pathways for each contaminant and each relevant medium should be tied to the potential receptors for each pathway. A discussion of contaminant characteristics relating to fate and transport of contaminants through each pathway shall also be included in this section.

c. Receptors

A section shall provide a listing and description of all anticipated potential receptors that could possibly be affected by the contamination present at the site. Potential receptors shall include human and ecological receptors, groundwater, and other features such as pathways that could divert or accelerate the transport of contamination to human receptors, ecological receptors, and groundwater.

8.14.5.8. Regulatory Criteria

A section shall set forth the applicable cleanup standards, risk-based screening levels, and risk-based cleanup goals for each pertinent medium at the subject site. The appropriate cleanup levels for each site shall be included, if site-specific levels have been established at separate sites or units. A table summarizing the applicable cleanup standards or levels, or inclusion of applicable cleanup standards or levels in the summary data tables shall be included in the Tables section of the document. The risk assessment shall be presented in a separate document or in an appendix to this report. If cleanup or screening levels calculated in a risk evaluation are employed, the risk evaluation document shall be referenced including pertinent page numbers for referenced information.

8.14.5.9. Identification of Corrective Measures Options

A section shall identify and describe potential corrective measures for source, pathway, and receptor controls. Corrective measures options shall include the range of available options including, but not limited to, a no action alternative, institutional controls, engineering controls, in-situ and on-site remediation alternatives, complete removal, and any combination of alternatives that would potentially achieve cleanup goals.

8.14.5.10. Evaluation of Corrective Measures Options

A section shall provide an evaluation of the corrective measures options identified in Permit Section 8.14.5.9. The evaluation shall be based on the applicability, technical feasibility, effectiveness, implementability, impacts to human health and the environment, and cost of each option. A table summarizing the corrective measures alternatives and the criteria listed below shall be included in the Tables section of this document. The general basis for evaluation of corrective measures options is defined below.

a. Applicability

Applicability addresses the overall suitability for the corrective action option for containment or remediation of the contaminants

in the subject medium for protection of human health and the environment.

b. Technical Practicability

Technical practicability describes the uncertainty in designing, constructing, and operating a specific remedial alternative. The description shall include an evaluation of historical applications of the remedial alternative including performance, reliability, and minimization of hazards.

c. Effectiveness

Effectiveness assesses the ability of the corrective measure to mitigate the measured or potential impact of contamination in a medium under the current and projected site conditions. The assessment also shall include the anticipated duration for the technology to attain regulatory compliance. In general, all corrective measures described above will have the ability to mitigate the impacts of contamination at the site, but not all remedial options will be equally effective at achieving the desired cleanup goals to the degree and within the same time frame as other options. Each remedy shall be evaluated for both short-term and long-term effectiveness.

d. Implementability

Implementability characterizes the degree of difficulty involved during the installation, construction, and operation of the corrective measure. Operation and maintenance of the alternative shall be addressed in this section.

e. Human Health and Ecological Protectiveness

This category evaluates the short-term (remedy installation-related) and long-term (remedy operation-related) hazards to human health and the environment of implementing the corrective measure. The assessment shall include whether the technology will create a hazard or increase existing hazards and the possible methods of hazard reduction.

f. Cost

This section shall discuss the anticipated cost of implementing the corrective measure. The costs shall be divided into: 1) capital costs associated with construction, installation, pilot testing, evaluation, permitting, and reporting of the effectiveness of the

alternative; and 2) continuing costs associated with operating, maintaining, monitoring, testing, and reporting on the use and effectiveness of the technology.

8.14.5.11. Selection of Preferred Corrective Measure

The Permittees shall propose the preferred corrective measure(s) at the site and provide a justification for the selection in this section. The proposal shall be based upon the ability of the remedial alternative to: 1) achieve cleanup objectives in a timely manner; 2) protect human and ecological receptors; 3) control or eliminate the sources of contamination; 4) control migration of released contaminants; and 5) manage remediation waste in accordance with State and Federal regulations. The justification shall include the supporting rationale for the remedy selection, based on the factors listed in Permit Section 8.14.5.10 and a discussion of short- and long-term objectives for the site. The benefits and possible hazards of each potential corrective measure alternative shall be included in this section.

8.14.5.12. Design Criteria to Meet Cleanup Objectives

The Permittees shall present descriptions of the preliminary design for the selected corrective measures in this section. The description shall include appropriate preliminary plans and specifications to effectively illustrate the technology and the anticipated implementation of the remedial option at the subject area. The preliminary design shall include a discussion of the design life of the alternative and provide engineering calculations for proposed remediation systems.

8.14.5.13. Schedule

A section shall set forth a proposed schedule for completion of remedy-related activities such as bench tests, pilot tests, construction, installation, remedial excavation, cap construction, installation of monitoring points, and other remedial actions. The anticipated duration of corrective action operations and the schedule for conducting monitoring and sampling activities shall also be presented. In addition, this section shall provide a schedule for submittal of reports and data to NMED, including a schedule for submitting all status reports and preliminary data.

8.14.5.14. Tables

A section shall present the following summary tables, as appropriate. With prior approval of NMED, the Permittees may combine one or more of the tables. Data presented in the summary tables shall include information on dates of sample collection, analytical methods, detection limits, and significant data quality exceptions. The analytical data tables



shall include only detected analytes and data quality exceptions that could potentially mask detections.

1. A table summarizing regulatory criteria, background, and/or the applicable cleanup standards.
2. A table summarizing historical field survey location data.
3. Tables summarizing historical field screening and field parameter measurements of soil, rock, sediments, groundwater, surface water, and air quality data.
4. Tables summarizing historical soil, rock, or sediment laboratory analytical data. The summary tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
5. A table summarizing historical groundwater elevation and depth to groundwater data. The table shall include the monitoring well depths and the screened intervals in each well.
6. Tables summarizing historical groundwater laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
7. Tables summarizing historical surface water laboratory analytical data if applicable. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
8. Tables summarizing historical air sample screening and analytical data. The data tables shall include the screening instruments used, laboratory analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data.
9. Tables summarizing historical pilot or other test data, if applicable, including units of measurement and types of instruments used to obtain measurements.
10. A table summarizing the corrective measures alternatives and evaluation criteria.
11. A table presenting the schedule for installation, construction, implementation, and reporting of selected corrective measures.

#### 8.14.5.15. Figures

A section shall present the following figures for each site, as appropriate. All figures must include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers. All figures shall have a date.

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features or properties.
2. A unit site plan that presents pertinent site features and structures, underground utilities, well locations, and remediation system locations and details. Off-site well locations and other relevant features shall be included on the site plan if practical. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features.
3. Figures showing historical soil boring or excavation locations and sampling locations.
4. Figures presenting historical soil sample field screening and laboratory analytical data, if appropriate.
5. Figures showing all existing wells including vapor monitoring wells and piezometers. The figures shall present historical groundwater elevation data and indicate groundwater flow directions.
6. Figures presenting historical groundwater laboratory analytical data including past data, if applicable. The analytical data corresponding to each sampling location may be presented as individual concentrations, in table form on the figure or as an isoconcentration map.
7. Figures presenting historical surface water sample locations and analytical data including past data, if applicable. The laboratory analytical data corresponding to each sampling location may be presented as individual concentrations or in table form on the figure.
8. Figures presenting historical air sampling locations and presenting air quality data. The field screening or laboratory analytical data corresponding to each sampling location may be presented as individual concentrations, in table form on the figure or as an isoconcentration map.

9. Figures presenting historical pilot or other test locations and data, where applicable, including site plans or graphic data presentation.
10. Figures presenting geologic cross-sections based on outcrop and borehole data, if applicable.
11. Figures presenting the locations of existing and proposed remediation systems.
12. Figures presenting existing remedial system design and construction details.
13. Figures presenting preliminary design and construction details for preferred corrective measures.

#### 8.14.5.16. Appendices

Each corrective measures evaluation shall include, as appropriate, as an appendix, the management plan for waste, including investigation derived waste, generated as a result of construction, installation, or operation of remedial systems or activities conducted. Each corrective measures evaluation shall include additional appendices presenting relevant additional data, such as pilot or other test or investigation data, remediation system design specifications, system performance data, or cost analyses as necessary.

#### 8.15. REFERENCES

U.S. Environmental Protection Agency (EPA), ~~as updated~~ *Regional Screening Levels for Chemical Contaminants at Superfund Sites*, - <https://www.epa.gov/risk/regional-screening-levels-rsls>  
<http://epa-prgs.ornl.gov/chemicals/index.shtml>

U.S. Environmental Protection Agency (EPA) 1989, *Risk Assessment Guidance for Superfund (RAGS), Volume I, Part A, 1989*, ~~as updated~~, [https://www.epa.gov/sites/default/files/2015-09/documents/rags\\_a.pdf](https://www.epa.gov/sites/default/files/2015-09/documents/rags_a.pdf)  
<http://www.epa.gov/oswer/riskassessment/ragsa/>

New Mexico Environment Department (NMED) 2000, *Assessing Human Health Risks Posed by Chemicals: Screening Level Risk Assessment*, ~~as updated~~. Santa Fe, New Mexico.

~~NMED 2021, *Risk Assessment Guidance for Site Investigation and Remediation: Volume I*, [https://www.env.nm.gov/hazardous-waste/wp-content/uploads/sites/10/2021/12/NMED\\_SSG-VOL\\_1\\_Dec\\_2\\_2021.pdf](https://www.env.nm.gov/hazardous-waste/wp-content/uploads/sites/10/2021/12/NMED_SSG-VOL_1_Dec_2_2021.pdf), NMED-2008, *Guidance for Assessing Ecological Risks Posed by Chemicals: Screening Level Ecological Risk Assessment*. Santa Fe, New Mexico.~~

~~NMED 2009, *Technical Background Document for Development of Soil Screening Levels*. Santa Fe, New Mexico.~~

1

**ATTACHMENT A**

2

**GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION**

**ATTACHMENT A**

**GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION**

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## 1 A-2 Description of Activities

2 The Waste Isolation Pilot Plant (**WIPP**) is a facility for the management, storage, and disposal of  
3 transuranic (**TRU**) mixed waste subject to regulation under 20.4.1.500 New Mexico  
4 Administrative Code (NMAC), incorporating Title 40 of the Code of Federal Regulations (CFR)  
5 Part 264. Both contact-handled (**CH**) and remote-handled (**RH**) TRU mixed wastes are  
6 permitted for storage and disposal at the WIPP facility.

## 7 A-3 Property Description

8 The WIPP property has been divided into functional areas. The Property Protection Area (**PPA**)  
9 is surrounded by a security barrier, which encompasses approximately 34 acres without the  
10 New Filter Building (**NFB**) and approximately 44 acres with the NFB and provides security and  
11 protection for ~~all the~~ major surface structures. A second PPA consisting of a nominal 22 acres  
12 surrounds Shaft #5. The DOE Off Limits Area encloses the PPA and is approximately 1,454  
13 acres. These areas define the DOE exclusion zone within which certain items and material are  
14 prohibited. The final zone is marked by the WIPP Site Boundary (~~WIPP Land Withdrawal Area~~),  
15 a 16-section Federal land area (Land Withdrawal Area) under the jurisdiction of the DOE.

## 16 A-4 Facility Type

17 There are three basic groups of structures associated with the WIPP facility: surface structures,  
18 shafts and underground structures. The surface structures accommodate the personnel,  
19 equipment, and support services required for the receipt, preparation, and transfer of TRU  
20 mixed waste from the surface to the underground. There are two surface locations where TRU  
21 mixed waste is managed and stored. The first area is the Waste Handling Building (**WHB**)  
22 Container Storage Unit (**WHB Unit**) for TRU mixed waste management and storage. The WHB  
23 Unit consists of the WHB ~~contact-handled (CH)~~CH Bay, Room 108, and the ~~remote-handled~~  
24 ~~(RH)~~RH Complex. The second area designated for managing and storing TRU mixed waste is  
25 the Parking Area Container Storage Unit (**Parking Area Unit**PAU), an outside container storage  
26 area which extends south from the WHB to the ~~rail siding~~chain-link security fence. The Parking  
27 Area UnitPAU provides storage space for ~~up to 50 loaded Contact Handled Packages~~CH  
28 shipping containers referred to as CH packages and ~~14 loaded Remote Handled Packages~~RH  
29 shipping containers referred to as RH packages on an asphalt and concrete surface. Permit  
30 Part 3 of the permit authorizes the storage and management of CH and RH TRU mixed waste  
31 containers in these two surface locations. The technical requirements of 20.4.1.500 NMAC  
32 (incorporating 40 CFR §§264.170 to 264.178) are applied to the operation of the WHB Unit and  
33 the Parking Area UnitPAU. Permit Attachment A1 describes the container storage units, the  
34 TRU mixed waste management facilities and operations, and compliance with the technical  
35 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §§264.170 to 264.178).

36 Four vertical shafts connect the surface facility to the underground. These are the Waste Shaft,  
37 the Salt Handling Shaft, the Exhaust Shaft, and the Air Intake Shaft. A fifth shaft, Shaft #5,  
38 located nominally 1,200 feet west of the Air Intake Shaft also connects the underground facility  
39 to the surface. The Waste Shaft is the only shaft used to transport TRU mixed waste to the  
40 underground. The WIPP facility underground structures are located in a mined salt bed  
41 approximately 2,150 feet below the surface. The underground facility is defined in 20.4.1.100  
42 NMAC (incorporating 40 CFR §260.10) as a "miscellaneous unit." As a miscellaneous unit,  
43 hazardous waste management units within the repository are subject to permitting according to

~~20.4.1.900 and 20.4.1.901 NMAC (incorporating 40 CFR Part 270) and are regulated under 20.4.1.500 NMAC (incorporating 40 CFR 264, Subpart X, Miscellaneous Units).~~

~~The WIPP is a geologic repository mined within a bedded salt formation, which is defined in 20.4.1.100 NMAC (incorporating 40 CFR §260.10) as a miscellaneous unit. As such, hazardous waste management units within the repository are subject to permitting according to 20.4.1.900 and .901 NMAC (incorporating 40 CFR §270), and are regulated under 20.4.1.500 NMAC, Miscellaneous Units.~~

The underground structures include the underground Hazardous Waste Disposal Units (HWDUs), ~~an area~~ areas for future underground HWDUs, the shaft pillar area, interconnecting drifts and other areas unrelated to the Hazardous Waste Facility Permit. The underground HWDUs are defined as waste panels, each consisting of seven rooms and two access drifts. The WIPP ~~facility~~ underground area is designated as Panels 1 through ~~4012~~, although only Panels ~~47~~ through ~~812~~, will be used under the terms of this ~~permit~~ Permit, because Panels 1-6 are filled and closed. Each of the seven rooms is approximately 300 feet long, 33 feet wide and 13 feet high in Panels 1-7, and approximately 300 feet long, 33 feet wide, and 16 feet high in Panel 8. ~~Permit~~ Part 4 ~~of the permit~~ authorizes the management and disposal of CH and RH TRU mixed waste containers in underground HWDUs.

The Disposal Phase ~~of the WIPP Project~~ consists of receiving ~~loaded~~ CH and RH ~~TRU mixed waste shipping containers~~ packages, unloading and transporting the waste containers to the underground HWDUs, emplacing the waste in the underground HWDUs, and subsequently achieving closure of the underground HWDUs in compliance with applicable ~~State~~ state and ~~Federal~~ federal regulations. As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601), the Permittees shall ensure that the environmental performance standards for a miscellaneous unit, which are applied to the underground HWDUs in the geologic repository, will be met. Permit Attachment A2 describes the underground HWDUs, the TRU mixed waste management facilities and operations, and compliance with the technical requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). ~~Permit Attachments G, G1, and G2 describe the closure activities.~~

#### A-5 Waste Description

Wastes destined for ~~disposal at the~~ WIPP ~~facility~~ are byproducts of nuclear weapons production and have been identified in terms of waste streams based on the processes that produced them. ~~Each waste~~ Waste streams identified by generators ~~is~~ are assigned to a Waste Summary Category to ~~facilitate RCRA waste characterization, and~~ reflect the final waste forms acceptable for ~~WIPP transportation and~~ disposal. ~~Details regarding the Summary Category Groups and waste characterization can be found in Permit Attachment C.~~

~~These Waste Summary Categories are:~~

##### ~~S3000—Homogeneous Solids~~

~~Solid process residues defined as solid materials, excluding soil, that do not meet the applicable regulatory criteria for classification as debris [20.4.1.800 NMAC, (incorporating 40 CFR §268.2(g) and (h))]. Solid process residues include inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are included in this Waste Summary Category based on the specific waste stream types and~~



~~final waste form. This category includes wastes that are at least 50 percent by volume solid process residues.~~

~~S4000—Soils/Gravel~~

~~This waste summary category includes waste streams that are at least 50 percent by volume soil. Soils are further categorized by the amount of debris included in the matrix.~~

~~S5000—Debris Wastes~~

~~This waste summary category includes waste that is at least 50 percent by volume materials that meet the NMAC criteria for classification as debris (20.4.1.800 NMAC (incorporating 40 CFR §268.2)). Debris means solid material exceeding a 2.36 inch (60 millimeter) particle size that is intended for disposal and that is: 1) a manufactured object, 2) plant or animal matter, or 3) natural geologic material.~~

~~The S5000 Waste Summary Category includes metal debris, metal debris containing lead, inorganic nonmetal debris, asbestos debris, combustible debris, graphite debris, heterogeneous debris, and composite filters, as well as other minor waste streams. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material.~~

~~If a waste does not include at least 50 percent of any given category by volume, characterization shall be performed using the waste characterization process required for the category constituting the greatest volume of waste for that waste stream.~~

Wastes may be generated at the WIPP facility as a direct result of managing the TRU and TRU mixed wastes received from the off-site generators. Such waste may be generated in either the WHB or the underground. This waste is referred to as “derived waste-,” which means its hazardous waste characteristics are derived from the off-site waste that produced it. All ~~s~~Such derived waste will be placed in the rooms in HWDUs along with the TRU mixed waste for disposal.

Non-mixed hazardous wastes generated at the WIPP facility, through activities where contact with TRU mixed waste does not occur, are characterized, placed in containers, and stored (for periods not exceeding the limits specified in 20.4.1.300 NMAC (incorporating 40 CFR §262.17)) until they are transported off site for treatment and/or disposal at a permitted-designated facility. This waste generation and accumulation activity, when performed in compliance with 20.4.1.300 NMAC (incorporating 40 CFR §Part 262), is not subject to RCRA permitting requirements and, as such, is not addressed in the permit, with the exception of the requirements of 20.4.1.300 NMAC (incorporating 40 CFR Part 262, Subpart M), which are addressed in Permit Attachment D.

1 A-6 Chronology of Events Relevant to Changes in Ownership or Operational Control

2 December 19, 1997 The New Mexico Environment Department (NMED) received notification  
3 of a change of name/ownership from Westinghouse Electric Corporation  
4 to CBS Corporation. The WIPP facility Management and Operating  
5 Contractor (**MOC**), Westinghouse Waste Isolation Division (**WID**),  
6 became a division of Westinghouse Electric Company, which in turn was  
7 a division of CBS Corporation. Notification to NMED was made by the  
8 permit applicant in a letter dated December 18, 1997. The ~~permit~~ Permit  
9 application was under review, but a draft ~~permit~~ Permit was not yet  
10 issued.

11 September 22, 1998 The NMED received notification of a pending transfer of ownership for the  
12 MOC, Westinghouse WID, from CBS Corporation to an as-yet-to-be-  
13 named limited liability company owned jointly by British Nuclear Fuels, plc  
14 and Morrison-Knudsen Corporation. The transfer of ownership was  
15 scheduled to occur on or about December 15, 1998. Notification to NMED  
16 was made by the permit applicant in a letter dated September 17, 1998.  
17 The draft ~~permit~~ Permit had been issued for public comment, but the final  
18 ~~permit~~ Permit was not yet issued.

19 March 9, 1999 The NMED again received notification of the pending divestiture of the  
20 MOC, Westinghouse WID, by CBS Corporation to the limited liability  
21 company owned jointly by British Nuclear Fuels, plc and Morrison-  
22 Knudsen Corporation known as MK/BNFL GESCO LLC. The new MOC  
23 would be renamed to Westinghouse Government Environmental Services  
24 Company LLC (**WGES**). Notification to NMED was made by the permit  
25 applicant in a letter dated March 2, 1999. The public hearing on the  
26 ~~permit~~ Permit was underway, but the final ~~permit~~ Permit was not yet  
27 issued.

28 March 26, 1999 The NMED received official notification of the divestiture of Westinghouse  
29 Electric Company by CBS Corporation to MK/BNFL GESCO LLC  
30 effective March 22, 1999. The MOC was renamed ~~Westinghouse~~  
31 ~~Government Environmental Services Company LLC (WGES)~~ WGES, of  
32 which Westinghouse ~~Waste Isolation Division~~ WID was a division. This  
33 transaction constituted a change of operational control under 20.4.1.900  
34 NMAC (incorporating 40 CFR §270.40). Notification to NMED was made  
35 by the permit applicant in a letter dated March 24, 1999. The public  
36 hearing on the ~~permit~~ Permit was nearly concluded, but the final ~~permit~~  
37 Permit was not yet issued.

38 April 28, 1999 The NMED received a revised Part A Permit Application in a letter dated  
39 April 21, 1999, reflecting that the Westinghouse ~~Waste Isolation~~  
40 ~~Division~~ WID, co-operator of the WIPP ~~hazardous waste~~ facility, was now  
41 a part of WGES. However, the final ~~permit~~ Permit, issued October 27,  
42 1999, did not reflect the change in ownership.

43 July 25, 2000 The NMED received a Class 1 permit modification in a letter dated July  
44 21, 2000, changing the name in the Permit from ~~Westinghouse Electric~~

1 ~~Corporation to Westinghouse Government Environmental Services~~  
2 ~~Company LLC (WGES) WGES Waste Isolation Division (WID) WID.~~  
3 ~~However, t~~This notification did not constitute the required permit  
4 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)  
5 necessary to reflect the transfer of the permit to a new operator.

6 December 15, 2000 The DOE announced that it had awarded a five-year contract for  
7 management and operation of the WIPP facility to Westinghouse TRU  
8 Solutions LLC, a limited liability company owned jointly by WGES LLC  
9 and Roy F. Weston, Inc. The announcement further stated that, following  
10 a brief transition period, the new contractor would assume MOC  
11 responsibilities on February 1, 2001. This transaction constituted a  
12 change of operational control under 20.4.1.900 NMAC (incorporating 40  
13 CFR §270.40) requiring a Class 1 permit modification with prior written  
14 approval of NMED.

15 February 5, 2001 The NMED received a Class 1 permit modification in a letter dated  
16 February 2, 2001, which notified NMED of an organizational name  
17 change of the MOC from ~~Westinghouse Government Environmental~~  
18 ~~Services Company LLC Waste Isolation Division~~WGES WID to  
19 Westinghouse TRU Solutions LLC. ~~However, t~~This notification did not  
20 constitute the required permit modification under 20.4.1.900 NMAC  
21 (incorporating 40 CFR §270.40) necessary to reflect the transfer of the  
22 permit to a new operator.

23 December 31, 2002 The NMED received a Class 1 permit modification in a letter dated  
24 December 27, 2002, which changed the name of the MOC from  
25 Westinghouse TRU Solutions LLC to Washington TRU Solutions LLC  
26 (WTS). ~~Again, t~~This notification did not constitute the required permit  
27 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)  
28 necessary to reflect the transfer of the permit to a new operator.

29 February 28, 2003 The NMED received a Class 1 permit modification requiring prior agency  
30 approval in a letter dated February 28, 2003, to satisfy the requirements  
31 specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.40) to reflect  
32 the transfer of the permit to a new operator.

33 September 16, 2004 The NMED received a Class 1 permit modification requiring prior agency  
34 approval in a letter dated September 16, 2004, describing a change of  
35 ownership of ~~Washington TRU Solutions LLC (WTS) WTS~~. WTS is owned  
36 jointly by WGES, managing member, and Weston Solutions, Inc. WGES  
37 had been owned jointly by Washington Group International, Inc. (WGI),  
38 and BNFL Nuclear Services, Inc. However, WGI has acquired BNFL's  
39 prior interest in the former Westinghouse government services  
40 businesses, which includes BNFL's prior interest in WGES.

41 August 6, 2007 The NMED received notification in a letter dated August 2, 2007 of the  
42 pending acquisition of WGI by URS Corporation at an unknown future  
43 date. This acquisition would be related to operational control, because  
44 WGI is the sole owner of WGES, managing member of the joint venture,

- 1 along with Weston Solutions, Inc., that owns WTS, the WIPP facility  
2 MOC. This notification was submitted to assure compliance with  
3 20.4.1.900 NMAC (incorporating 40 CFR §270.40(b)).
- 4 November 26, 2007 The NMED received a Class 1 permit modification requiring prior agency  
5 approval in a letter dated November 19, 2007, describing a change of  
6 ownership of WTS. On November 15, 2007, WGI was acquired by URS  
7 Corporation. WTS is owned jointly by WGES, managing member, and  
8 Weston Solutions, Inc. WGES, formerly owned by WGI, is now owned by  
9 URS Corporation.
- 10 October 1, 2012 The NMED received a Class 1 permit modification requiring prior agency  
11 approval in a letter dated June 25, 2012 describing a change in the MOC  
12 for the WIPP facility. The new MOC for the WIPP facility will be Nuclear  
13 Waste Partnership LLC. The new MOC is comprised of URS Energy &  
14 Construction, Inc. and Babcock and Wilcox Technical Services Group,  
15 Inc.
- 16 April 1, 2014 URS announced an organizational realignment to move Global  
17 Management and Operational Services Group (GMOS) from URS Energy  
18 & Construction to URS Federal Services Division. Nuclear Waste  
19 Partnership LLC is part of GMOS and remains in this group. The MOC is  
20 comprised of URS Federal Services, Inc. and Babcock and Wilcox  
21 Technical Services Group, Inc.
- 22 January 5, 2015 On January 5, 2015 URS merged with AECOM. The ~~WIPP Management~~  
23 ~~and Operating Contractor (MOC)~~, Nuclear Waste Partnership LLC,  
24 is comprised of URS Energy & Construction, Inc. (an organization within  
25 AECOM) and Babcock and Wilcox Technical Services Group, Inc. This  
26 merger is therefore not related to a change in operational control because  
27 URS Energy & Construction, Inc. continues to be 70% owner of  
28 Nuclear Waste Partnership LLC.
- 29 July 1, 2015 On June 8, 2015 the Babcock & Wilcox Company announced its intent to  
30 change the name to BWXT Technical Services Group, Inc. (BWXT TSG).  
31 This change was effective July 1, 2015. No changes are being made to  
32 the ~~Management and Operating Contractor (MOC)~~. The MOC is  
33 comprised of URS Energy & Construction, Inc. and BWXT Technical  
34 Services Group, Inc.
- 35 September 19, 2016 URS Energy & Construction, Inc. changed its name to AECOM Energy &  
36 Construction, Inc. This name change was effective September 19, 2016.  
37 No changes are being made to the ~~Management and Operating~~  
38 ~~Contractor (MOC)~~. This is a name change only; there was no change in  
39 operational control. The MOC, Nuclear Waste partnership LLC, is  
40 comprised of AECOM Energy & Construction, Inc. and BWXT Technical  
41 Services Group, Inc. This change does not constitute the required permit  
42 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)  
43 necessary to reflect the transfer of the ~~permit~~Permit to a new operator.

1     January 31, 2020     Lindsay Goldberg/American Securities purchased AECOM's  
2                             Management Services group, forming a new company named Amentum.  
3                             Included in that transaction was AECOM Energy & Construction, Inc.,  
4                             which continues to be the legal guarantor and majority owner of the MOC,  
5                             Nuclear Waste Partnership LLC. No changes are being made to the  
6                             MOC. Nuclear Waste Partnership LLC is still comprised of AECOM  
7                             Energy & Construction, Inc. and BWXT Technical Services Group, Inc.  
8                             This is a change in ultimate parent company only; there was no change in  
9                             operational control. Therefore, this change does not constitute the  
10                            required permit modification under 20.4.1.900 NMAC (incorporating 40  
11                            CFR §270.40) necessary to reflect the transfer of the permit to a new  
12                            operator.

**ATTACHMENT A1**  
**CONTAINER STORAGE**

## ATTACHMENT A1

### CONTAINER STORAGE

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- 46 ~~Figure A1-25 CNS 10-160B Drum Carriage~~
- 47 ~~Figure A1-26 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram~~
- 48 ~~for RH TRU 72-B Shipping Cask~~
- 49 ~~Figure A1-27 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram~~
- 50 ~~for CNS 10-160B Shipping Cask~~
- 51 ~~Figure A1-28 Schematic of the RH Transuranic Mixed Waste Process for RH TRU 72-B~~
- 52 ~~Shipping Cask~~
- 53 ~~Figure A1-29 Schematic of the RH Transuranic Mixed Waste Process for CNS 10-160B~~
- 54 ~~Shipping Cask~~
- 55 ~~Figure A1-30 RH Shielded Insert Assembly~~
- 56 ~~Figure A1-31 Transfer Cell Shuttle Car~~
- 57 ~~Figure A1-32 Facility Rotating Device~~
- 58 ~~Figure A1-33 Typical TRUPACT-III~~
- 59 ~~Figure A1-34 Typical Standard Large Box 2~~
- 60 ~~Figure A1-35 Typical Yard Transfer Vehicle~~
- 61 ~~Figure A1-36 Payload Transfer Station~~
- 62 ~~Figure A1-37 Typical Shielded Container~~

## ATTACHMENT A1

### CONTAINER STORAGE

#### Introduction

Management and storage of transuranic (TRU) mixed waste in the Waste Isolation Pilot Plant (WIPP) facility is subject to regulation under 20.4.1.500 New Mexico Administrative Code (NMAC). The technical requirements of 20.4.1.500 NMAC (incorporating Title 40 of the Code of Federal Regulations (CFR) §§264.170 to 264.178) are applied to the operation of the Waste Handling Building (WHB) Container Storage Unit (WHB Unit), (Figure M-1A1-4), and the Parking Area Container Storage Unit (Parking Area UnitPAU), (Figure M-2A1-2). This Permit Attachment describes the container storage units, the TRU mixed waste management facilities and operations, and compliance with the technical requirements of 20.4.1.500 NMAC. The configuration of the WIPP facility consists of completed structures, including ~~all~~ buildings, ~~and~~ systems, and components for the operation of the facility.

#### A1-1 Container Storage

The waste containers ~~that will be~~ used at the WIPP facility qualify as “containers,” in accordance with 20.4.1.101 NMAC (incorporating 40 CFR §260.10). That is, they are “portable devices in which a material is stored, transported, treated, disposed of, or otherwise handled.”

#### A1-1a Containers with Liquid

The Permit Treatment, Storage, and Disposal Facility (TSDF) Waste Acceptance Criteria (WAC) and the Waste Analysis Plan (Permit Attachment C) prohibit the shipment of waste to the WIPP facility with liquid in excess of one percent of the volume of the waste container (e.g., drum, standard waste box ~~[(SWB)],~~ or canister). Since the maximum amount of liquid is one percent, calculations made to determine the secondary containment as required by 20.4.1.500 NMAC (incorporating §264.175) are based on ten percent of one percent of the volume of the containers, or one percent of the largest container, whichever is greater.

#### A1-1b Description of Containers

The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.171) requires that containers holding waste be in good condition as provided in Permit Part 3, Section 3.3, Condition of Containers. Waste containers shall be in good condition (e.g., high integrity, intact, no severe rusting, no apparent structural defects, no signs of pressurization) prior to shipment from ~~the a~~ generator ~~site, i.e., containers will be of high integrity, intact, and free of surface contamination above DOE limits~~. The Manager of the U.S. Department of Energy (DOE) Carlsbad Field Office has the authority to suspend a generator’s certification to ship TRU mixed waste to the WIPP facility should the generator fail to meet this requirement. ~~The containers will be certified free of surface contamination above DOE limits upon shipment. This condition shall be verified upon receipt of the waste at WIPP.~~ The level of rigor applied in these areas to ensure container integrity ~~and the absence of external contamination~~ on both ends of the transportation process will ensures that waste containers entering the waste management process line at the WIPP facility meet the applicable Resource Conservation and Recovery Act (RCRA) requirements for container condition.

Transuranic mixed waste containers meet the requirements for U.S. Department of Transportation (DOT) specification 7A regulations. These containers are required to be vented through one or more DOE-approved filter vents to prevent internal container pressurization caused by gas generation and to prevent radioactive particulate material from escaping.

#### A1-1b(1) CH TRU Mixed Waste Containers

Contact-handled (CH) TRU mixed waste containers ~~will be~~ are either 55-gal-gallon (gal) (208-Liter (L)) drums singly or arranged into ~~7~~ seven-packs, 85-gal (322-L) drums singly or arranged into ~~4~~ four-packs, 100-gal (379 L) drums singly or arranged into ~~3~~ three-packs, ten-drum overpacks (TDOP), standard large box 2s (SLB2), or SWBs. These CH mixed waste containers may be either direct-loaded or used to overpack CH TRU mixed containers that are leaking or are not in good condition. The CH TRU mixed waste containers are constructed of steel. Drums may also contain rigid, molded polyethylene (or other material compatible with TRU mixed waste) liners. A summary description of each CH TRU mixed waste container type is provided below in Table A1-1, and the containers are illustrated in Figures M-3 through M-8. The maximum loaded, or gross, weights of these containers are listed in Table A1-2.

#### Standard 55-Gallon Drums

~~Standard 55-gal (208-L) drums meet the requirements for U.S. Department of Transportation (DOT) specification 7A regulations.~~

~~A standard 55-gal (208-L) drum has a gross internal volume of 7.4 cubic feet (ft<sup>3</sup>) (0.21 cubic meters (m<sup>3</sup>)). Figure A1-3 shows a standard TRU mixed waste drum. One or more filtered vents (as described in Section A1-1d(1)) will be installed in the drum lid to prevent the escape of any radioactive particulates and to eliminate any potential of pressurization.~~

~~Standard 55-gal (208-L) drums are constructed of mild steel and may also contain rigid, molded polyethylene (or other compatible material) liners. These liners are procured to a specification describing the functional requirements of fitting inside the drum, material thickness and tolerances, and quality controls and required testing. A quality assurance surveillance program is applied to all procurements to verify that the liners meet the specification.~~

~~Standard 55-gal (208-L) drums may be used to collect derived waste.~~

#### Standard Waste Boxes

~~The SWBs meet all the requirements of DOT specification 7A regulations.~~

~~One or more filtered vents (as described in Section A1-1d(1)) will be installed in the SWB body and located near the top of the SWB to prevent the escape of any radioactive particulates and to eliminate any potential of pressurization. They have an internal volume of 66.3 ft<sup>3</sup> (1.88 m<sup>3</sup>). Figure A1-4 shows a SWB.~~

~~The SWB is the largest container that may be used to collect derived waste.~~

#### Ten-Drum Overpack

~~The TDOP is a metal container, similar to a SWB, that meets DOT specification 7A and is certified to be noncombustible and to meet all applicable requirements for Type A packaging. The TDOP is a welded steel, right circular cylinder, approximately 74 inches (in.) (1.9 meters (m)) high and 71 in. (1.8 m) in diameter (Figure A1-5). The maximum loaded weight of a TDOP is 6,700 pounds (lbs) (3,040 kilograms (kg)). A bolted lid on one end is removable; sealing is accomplished by clamping a neoprene gasket between the lid and the body. One or more filter vents are located near the top of the TDOP on the body to prevent the escape of any radioactive particulates and to eliminate any potential of pressurization. A TDOP may contain up to ten standard 55-gal (208-L) drums or one SWB. TDOPs may be used to overpack drums or SWBs containing CH TRU mixed waste. The TDOP may also be direct loaded with CH TRU mixed waste. Figure A1-5 shows a TDOP.~~

#### ~~Eighty-Five Gallon Drum~~

~~The 85-gal (322-L) drums meet the requirements for DOT specification 7A regulations. An 85-gal (322-L) drum has a gross internal volume of 11.4 ft<sup>3</sup> (0.32 m<sup>3</sup>). One or more filtered vents (as described in Section A1-1d(1)) will be installed in the 85-gal drum to prevent the escape of any radioactive particulates and to eliminate any potential of pressurization.~~

~~85-gal (322-L) drums are constructed of mild steel and may also contain rigid, molded polyethylene (or other compatible material) liners. These liners are procured to a specification describing the functional requirements of fitting inside the drum, material thickness and tolerances, and quality controls and required testing. A quality assurance surveillance program is applied to all procurements to verify that the liners meet the specification.~~

~~The 85-gal (322-L) drum, which is shown in Figure A1-6, will be used for overpacking contaminated 55-gal (208-L) drums at the WIPP facility. The 85-gal drum may also be direct loaded with CH TRU mixed waste.~~

~~85-gal (322-L) drums may be used to collect derived waste.~~

#### ~~100-Gallon Drum~~

~~100-gal (379-L) drums meet the requirements for DOT specification 7A regulations.~~

~~A 100-gal (379-L) drum has a gross internal volume of 13.4 ft<sup>3</sup> (0.38 m<sup>3</sup>). One or more filtered vents (as described in Section A1-1d(1)) will be installed in the drum lid or body to prevent the escape of any radioactive particulates and to eliminate any potential of pressurization.~~

~~100-gal (379-L) drums are constructed of mild steel and may also contain rigid, molded polyethylene (or other compatible material) liners. These liners are procured to a specification describing the functional requirements of fitting inside the drum, material thickness and tolerances, and quality controls and required testing. A quality assurance surveillance program is applied to all procurements to verify that the liners meet the specification.~~

~~100-gal (379-L) drums may be direct loaded.~~

1 Standard Large Box 2

2 The SLB2 meets the requirements of DOT specification 7A requirements. The SLB2 is a welded  
3 steel container with a gross internal volume of 261 ft<sup>3</sup> (7.39 m<sup>3</sup>).

4 ~~One or more filtered vents will be installed in the SLB2 body and located near the top of the~~  
5 ~~SLB2 to prevent the escape of radioactive particulates and to prevent internal pressurization.~~  
6 ~~Figure A1-34 shows an SLB2.~~

7 A1-1b(2) RH TRU Mixed Waste Containers

8 Remote-Handled (RH) TRU mixed waste containers include RH-TRU 72-B Canisters, which  
9 are received at the WIPP facility loaded singly in an RH-TRU 72-B cask; Facility Canisters,  
10 which are used to configure 55-gal (208-L) drums for emplacement; shielded containers, which  
11 are received in HalfPACTs; and 55-gallon-gal (208-L) drums, which are received in a CNS 10-  
12 160B cask. The RH TRU mixed waste containers are constructed of steel. The shielded  
13 container is constructed with approximately one inch of lead shielding on the sides and  
14 approximately three inches of steel on the top and bottom of the container and is used to  
15 emplace RH TRU mixed waste; however, the shielding allows it to be managed and stored in  
16 accordance with CH TRU mixed waste handling practices. A summary description of each RH  
17 TRU mixed waste container type is provided in Table A1-1, and the containers are illustrated in  
18 Figures M-9 through M-11. The maximum loaded, or gross, weights of these containers are  
19 listed in Tables A1-2 and A1-3.

20 RH TRU Canister

21 The RH TRU Canister is a steel single shell container which is constructed to be of high  
22 integrity. An example canister is depicted in Figure A1-16a. The RH TRU Canister is vented and  
23 will have a nominal internal volume of 31.4 ft<sup>3</sup> (0.89 m<sup>3</sup>) and shall contain waste packaged in  
24 small containers (e.g., drums) or waste loaded directly into the canister.

25 Standard 55-Gallon Drums

26 Standard 55 gal (208-L) drums meet the requirements for U.S. Department of Transportation  
27 (DOT) specification 7A regulations. A detailed description of a standard 55-gallon drum is  
28 provided above. Up to ten 55-gallon drums containing RH TRU mixed waste are arranged on  
29 two drum carriage units in the CNS 10-160B cask (up to five drums per drum carriage unit). The  
30 drums are transferred to an RH TRU mixed waste Facility Canister that will contain three drums.

31 Shielded Container

32  
33 Remote-Handled TRU mixed waste received at the WIPP facility in shielded containers will be  
34 arranged as three-packs. A summary description of the shielded container is provided below.  
35 The shielded container meets the requirements for DOT specification 7A (Figure A1-37).

36  
37 Each shielded container has a gross internal volume of 7.4ft<sup>3</sup> (0.21m<sup>3</sup>). One or more filter vents  
38 will be installed in the shielded container lid to prevent the escape of radioactive particulates  
39 and to prevent internal pressurization. The shielded container is constructed with approximately  
40 one inch of lead shielding on the sides and approximately three inches of steel on the top and

~~bottom of the container and will be used to emplace RH TRU mixed waste. The shielding will allow it to be managed and stored as CH TRU mixed waste.~~

### A1-1b(3) Container Compatibility

All ~~e~~C containers ~~will be~~are made of steel, and some ~~will~~contain rigid, molded polyethylene liners. The compatibility study, documented in Appendix C1 of the WIPP RCRA Part B Permit Application (DOE, 1997a), included container materials to assure containers are compatible with the waste. Therefore, these containers meet the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.172).

### A1-1c Description of the Container Storage Units

#### A1-1c(1) Waste Handling Building Container Storage Unit (WHB Unit)

The ~~Waste Handling Building (WHB)~~WHB is the surface facility where TRU mixed waste handling activities ~~will~~take place (Figure ~~M-12A1-1a~~). The WHB has a total area of approximately 84,000 square feet (~~ft~~<sup>2</sup>) (7,804 square meters (~~m~~<sup>2</sup>)) of which 32,307 ~~ft~~<sup>2</sup> (3,001 ~~m~~<sup>2</sup>) are designated for the waste handling and container storage of CH TRU mixed waste and 17,403 ~~ft~~<sup>2</sup> (1,617 ~~m~~<sup>2</sup>) are designated for handling and storage of RH TRU mixed waste, as shown in Figures ~~M-1 and M-13 through M-16A1-1, A1-14a, and A1-17a, b, c, and d~~. These areas ~~are being permitted as~~comprise the WHB Unit. The concrete floors are ~~sealed with a coating that is~~sufficiently impervious to ~~the chemicals in~~contain leaks and spills of TRU mixed waste to meet the requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.175(b)(1)). ~~The concrete floors are sealed with a coating that has been demonstrated to be compatible with TRU mixed waste.~~

#### CH Bay Surge Storage Area

The Permittees ~~will~~coordinate shipments with the generator/storage sites in an attempt to minimize the use of surge storage. However, there may be circumstances causing shipments to arrive that would exceed the maximum capacity of the CH Bay Storage Area, ~~as specified in Permit Part 3, Table 3.1.1, WHB Unit~~. The Permittees may use the CH Bay Surge Storage Area as specified in ~~Permit Part 3, Section 3.1.1.3~~ (see Figure ~~M-1A1-4~~) only when the maximum capacities in the CH Bay Storage Area (except for the Shielded Storage Room) and the Parking Area Unit are reached and at least one of the following conditions is met ~~(as discussed in Section A1-1e(2), the PAU may not be full, but the shipping package has reached day 59 of its Nuclear Regulatory Commission (NRC) 60-day venting period limit, and the waste containers must be removed from the shipping package and placed into storage in the WHB Unit)~~:

- Surface or underground waste handling equipment malfunctions prevent the Permittees from moving waste to disposal locations;
- Hoisting or underground ventilation equipment malfunctions prevent the Permittees from moving waste into the underground;
- Power outages cause a suspension of waste emplacement activities;
- Inbound shipment delays are imminent because ~~Parking Area Container Storage Unit~~the PAU Surge Storage is in use; or

- 1 • Onsite or offsite emergencies cause a suspension of waste emplacement activities.

2 The Permittees must notify the NMED and those on the e-mail notification list (as specified in  
3 Permit Part 1, Sections 1.11 and Permit Part 3, Section 3.1.1.4) upon using the CH Bay Surge  
4 Storage Area and provide justification for its use.

#### 5 CH TRU Mixed Waste

6 The ~~Contact Handled Packaging~~CH packages used to transport TRU mixed waste containers  
7 ~~will be~~received through one of three air-lock entries to the CH Bay of the WHB Unit. The  
8 WHB heating, ventilation and air conditioning (HVAC) system maintains the interior of the WHB  
9 at a pressure lower than the ambient atmosphere to ensure that air flows into the WHB,  
10 preventing the inadvertent release of any hazardous or radioactive constituents contamination  
11 as the result of a contamination event. The doors at each end of the air lock are interlocked to  
12 prevent both from opening simultaneously and equalizing CH Bay pressure with outside  
13 atmospheric pressure.

- 14 • TRUPACT-II and HalfPACT Management

15 The CH Bay houses two TRUPACT-II Docks (TRUDOCKs), each equipped with  
16 overhead cranes for opening and unloading ~~Contact Handled Packaging~~CH packages.  
17 The TRUDOCKs are within the TRUDOCK Storage Area of the WHB Unit. The cranes  
18 are rated to lift the ~~Contact Handled Packaging~~CH package lids ~~as well as their~~  
19 ~~and~~ package contents. The cranes are designed to remain on their tracks and hold their  
20 load even in the event of a design-basis earthquake.

21 Upon receipt and removal of CH TRU mixed waste containers from the ~~Contact~~  
22 ~~Handled Packaging~~CH package, the ~~waste containers are required to be in good~~  
23 ~~condition as provided in Permit Part 3. The~~ waste containers ~~will be~~ visually  
24 inspected for physical damage (~~severe rusting, apparent structural defects, signs of~~  
25 ~~pressurization, etc.~~) and leakage to ensure they are in good condition prior to storage.  
26 Waste containers ~~will be~~ also ~~be~~ checked for external radiological surface  
27 contamination ~~through the use of swipes and radiation monitoring equipment,~~  
28 ~~consistent with radiological control procedures pursuant to 10 CFR Part 835. If a~~  
29 ~~primary waste container is not in good condition, the Permittees will overpack the~~  
30 ~~container, repair/patch the container in accordance with 49 CFR §173 and §178 (e.g.,~~  
31 ~~49 CFR §173.28), or return the container to the generator. The Permittees may initiate~~  
32 ~~local decontamination, return unacceptable containers to a DOE generator site or send~~  
33 ~~the Contact Handled Package to a third party contractor. Decontamination activities~~  
34 will not be conducted on containers ~~which that~~ are not in good condition, or ~~which~~ are  
35 leaking. ~~If the waste container is not in good condition, the Permittees will either~~  
36 ~~overpack the container with another approved container, repair/patch the container in~~  
37 ~~accordance with appropriate standards and guidance (e.g., 40 CFR §173.28), return~~  
38 ~~the container to the generator, or send the CH package to a third-party contractor. If~~  
39 local decontamination activities are opted for, the work will be conducted in the WHB  
40 Unit, consistent with radiological control procedures on the TRUDOCK. These  
41 processes are described in Section A1-1d.

42 Once unloaded from the ~~Contact Handled Packaging~~CH package, CH TRU mixed  
43 waste containers (~~7~~seven-packs, ~~3~~three-packs, ~~4~~four-packs, SWBs, or TDOPs) are



1 placed in one of two positions on the facility pallet or on a containment pallet. The  
2 waste containers are stacked, on the facility pallets (one- or two-high, depending on  
3 weight considerations). Waste on containment pallets ~~will be~~ stacked one-high. The  
4 use of facility or containment pallets ~~will elevate~~ the waste at least 6 inches (in.) (15  
5 centimeters (cm)) from the floor surface. Pallets of waste ~~will be~~ then ~~relocated~~  
6 maintained in the CH Bay Storage Area of the WHB Unit for normal storage.

7 In addition, four ~~Contact-Handled Packages~~CH packages, containing up to eight  
8 ~~seven~~-packs, ~~three~~-packs, ~~four~~-packs, SWBs, or four TDOPs, may occupy  
9 positions at the TRUDOCKs. If waste containers are left in this area, they will be in the  
10 ~~Contact-Handled Package~~CH package with or without the shipping container lids  
11 removed. ~~The maximum TRU mixed waste volume in containers in four Contact-~~  
12 ~~Handled Packages is 640 ft<sup>3</sup> (18.1 m<sup>3</sup>).~~

13 • TRUPACT-III Management

14 The TRUPACT-III containing one SLB2 ~~will be~~ transferred to a Yard Transfer Vehicle  
15 in the ~~Parking Area Unit~~PAU using a forklift. The Yard Transfer Vehicle then transports  
16 the TRUPACT-III into the CH Bay through one of the airlocks and into Room 108 for  
17 unloading (Figure M-1A1-1b). The TRUPACT-III is first transported to the bolting  
18 station where the overpack cover and closure lid are removed using a bolting robot, or  
19 manually as required, and a monorail hoist. The TRUPACT-III is then moved to the  
20 ~~payload~~Payload transfer~~Transfer station~~Station where the SLB2 is removed from the  
21 TRUPACT-III.

22 The SLB2 ~~will be~~ visually inspected for physical damage and leakage in a similar  
23 manner as containers removed from a TRUPACT-II or HalfPACT (~~i.e., severe rusting,~~  
24 ~~apparent structural defects, or signs of pressurization~~) and for leakage to ensure it is in  
25 good condition. The SLB2 ~~will also be~~ also checked for external radiological surface  
26 contamination through the use of swipes and radiation monitoring equipment,  
27 consistent with radiological control procedures pursuant to 10 CFR Part 835. ~~If the~~  
28 ~~SLB2 is not in good condition, the Permittees will repair/patch the container in~~  
29 ~~accordance with 49 CFR §173 and §178 (e.g., 49 CFR §173.28), or return the~~  
30 ~~container to the generator. The Permittees may initiate local decontamination, return~~  
31 ~~unacceptable containers to a DOE generator site or send the SLB2 to a third-party~~  
32 ~~contractor. Decontamination activities will not be conducted on containers that are not~~  
33 ~~in good condition or are leaking. If the waste container is not in good condition, the~~  
34 ~~Permittees will either repair/patch the container in accordance with appropriate~~  
35 ~~standards and guidance (e.g., 49 CFR §173.28), return the container to the generator,~~  
36 ~~or send the SLB2 to a third-party contractor.~~ If local decontamination activities are  
37 opted for, the work will be conducted in the WHB Unit consistent with radiological  
38 control procedures pursuant to 10 CFR Part 835.

39 Once the SLB2 is unloaded from the TRUPACT-III in Room 108, it ~~will be~~ placed on  
40 a facility pallet and moved to a pallet stand or floor storage location in the CH Bay or  
41 Room 108 for storage or to the conveyance loading room for waste emplacement.

42 The CH Bay Storage Area, which is As shown indicated in Figure M-1A1-4, will be clearly  
43 marked to indicate the lateral limits of the storage area the shaded areas of the CH Bay and  
44 Room 108 (CH Bay Storage Area) are available for TRU mixed waste storage as long as



1 ~~sufficient aisle space (i.e., minimum of 44 in. (1.1 m)) is maintained. This CH Bay Storage Area~~  
2 ~~will have a maximum capacity of 13 pallets (4,160 ft<sup>3</sup> [118 m<sup>3</sup>]) of TRU mixed waste containers~~  
3 ~~during normal operations. Transuranic mixed waste may be stored in the CH Bay Storage Area of~~  
4 ~~the WHB Unit in quantities not to exceed the maximum capacities specified in Permit Part 3,~~  
5 ~~Table 3.1.1.~~

6 The Derived Waste Storage Area of the WHB Unit is on the north wall of the CH Bay. This area  
7 ~~will may~~ contain containers up to the volume of ~~a an~~ SWB for collecting derived waste from all  
8 TRU mixed waste handling processes in the WHB Unit. The Derived Waste Storage Area ~~is~~  
9 ~~being permitted to allow~~can accommodate containers in size up to ~~a an~~ SWB to be used to  
10 accumulate derived waste. The TRU mixed waste volume stored in this area will ~~be up to 66.3~~  
11 ~~ft<sup>3</sup> (1.88 m<sup>3</sup>)~~not exceed the maximum capacity specified in Permit Part 3, Table 3.1.1. The  
12 derived waste containers in the Derived Waste Storage Area ~~will be~~ stored on ~~standard~~  
13 ~~drum~~containment pallets, which are polyethylene trays with a grated deck, which ~~will~~ elevate the  
14 derived waste containers ~~approximately at least~~ 6 in. (15 cm) from the floor surface, and provide  
15 approximately 50 gal (190 L) of secondary containment capacity.

16 ~~Aisle space shall be maintained in all WHB Unit TRU mixed waste storage areas.~~The aisle  
17 space ~~in the WHB Unit TRU mixed waste storage areas shall be~~ adequate to allow  
18 unobstructed movement of fire-fighting personnel, spill-control equipment, and decontamination  
19 equipment that would be used in the event of an off-normal event. ~~An A minimum~~ aisle ~~space~~  
20 ~~spacing~~ of 44 in. (1.1 m) between ~~loaded~~ facility pallets ~~will be~~ maintained in ~~all the~~ WHB Unit  
21 TRU mixed waste storage areas. ~~Concrete barriers provide added protection from equipment~~  
22 ~~being utilized in adjacent rooms and buildings to the west of the CH-Bay wall in the WHB. An~~  
23 ~~aisle space of 60 in. (1.5 m) will be maintained between the west wall of the CH Bay and facility~~  
24 ~~pallets.~~

25 The WHB has been designed to meet DOE design and associated quality assurance  
26 requirements. ~~The 2009 Amended Renewal Application, Chapter M1, Table M1-1 (DOE, 2009)~~  
27 ~~provided a summary of basic design requirements, principal codes, and standards for the WIPP~~  
28 ~~facility. Table A1-1 summarizes basic design requirements, principal codes, and standards for~~  
29 ~~the WIPP facility.~~ Appendix D2 of the WIPP RCRA Part B Permit Application (DOE, 1997a)  
30 provided engineering design-basis earthquake and tornado reports. The design-basis  
31 earthquake report provides the basis for seismic design of WIPP facility structures, including the  
32 WHB foundation. The WIPP ~~facility~~ design-basis earthquake is 0.1 g ~~peak ground acceleration~~.  
33 The WIPP ~~facility~~ design-basis tornado includes a maximum windspeed of 183 ~~miles~~ per ~~hour~~  
34 ~~(mi/hr)~~ ((294.5 ~~kilometers per hr (km/hr)~~)), which is the vector sum of ~~all the~~ velocity  
35 components. It is also limited to a translational velocity of 41 mi/hr (66 km/hr) and a tangential  
36 velocity of 124 mi/hr (200 km/hr). Other parameters are a radius of maximum wind of 325 ft  
37 (99 m), a pressure drop of 0.5 ~~pounds per square inch (lb<sub>f</sub>/in.<sup>2</sup>)~~ (3.4 kilopascals ((~~kPa~~))),  
38 and a rate-of-pressure drop of 0.09 ~~pounds per square inch per second (lb/in.<sup>2</sup>/s)~~ (0.6  
39 ~~kilopascals per second (kPa/s)~~). A design-basis flood report is not available because flooding is  
40 not a credible phenomenon at the WIPP facility. Design calculations for the probable maximum  
41 precipitation (PMP) event, provided in Appendix D7 of the WIPP RCRA Part B Permit  
42 Application (DOE, 1997a), illustrated run-on protection for the WIPP facility.

43 The WIPP facility does not lie within a 100-year floodplain. There are no major surface-water  
44 bodies within 5 ~~miles (mi)~~ (8 ~~kilometers (km)~~) of the site, and the nearest river, the Pecos River,  
45 is approximately 12 mi (19 km) away. The general ground elevation in the vicinity of the surface  
46 facilities (approximately 3,400 ~~feet (ft)~~ ((1,036 ~~meters (m)~~))) above mean sea level) is about 500

1 ft (152 m) above the riverbed and 400 ft (122 m) above the 100-year floodplain. Protection from  
2 flooding or ponding caused by PMP events is provided by the diversion of water away from the  
3 WIPP facility by a system of peripheral interceptor berms and dikes. Additionally, grade  
4 elevations of roads and surface facilities are designed so that storm water will not collect within  
5 the Property Protection Area under the most severe conditions.

6 The following are the major pieces of equipment that ~~will be~~are used to manage CH TRU mixed  
7 waste in the container storage units. A summary of equipment capacities, as required by  
8 20.4.1.500 NMAC is included in Table A1-2.

#### 9 TRUPACT-II Type B Packaging

10 The TRUPACT-II (Figure ~~M-17A1-8a~~) is a cylindrical shipping container 8 ft (2.4 m) in diameter  
11 and 10 ft (3 m) high. It ~~meets is an~~ NRC-certified Type B ~~shipping container package designed to~~  
12 ~~meet the applicable~~ requirements ~~of 10 CFR Part 71~~ and has successfully completed rigorous  
13 container-integrity tests. The payload consists of approximately 7,265 ~~lbs-pounds (lb)~~ (3,300  
14 ~~kilograms (kg)~~) gross weight in up to fourteen 55-gal (208-L) drums, eight 85-gal (322-L) drums,  
15 six 100-gal (379-L) drums, two SWBs, or one TDOP.

#### 16 HalfPACT Type B Packaging

17 The HalfPACT (Figure ~~M-18A1-8b~~) is a right cylindrical shipping container 8 ft (2.4 m) in  
18 diameter and 7.6 ft (2.3 m) high. It ~~meets is an~~ NRC-certified Type B ~~shipping container package~~  
19 ~~designed to meet the applicable~~ requirements ~~of 10 CFR Part 71~~ and has successfully  
20 completed rigorous container-integrity tests. The payload consists of approximately 7,600 ~~lbs-lb~~  
21 (3,500 kg) gross weight in up to seven 55-gal (208-L) drums, one SWB, ~~or~~ four 85-gallon-gal  
22 ~~(322-L) drums, or three shielded containers.~~

#### 23 TRUPACT-III Type B Packaging

24 The TRUPACT-III (Figure ~~M-19A1-33~~) is an NRC-certified Type B package designed to meet  
25 the ~~containment and shielding applicable~~ requirements of 10 CFR Part 71. The nominal  
26 dimensions for a TRUPACT-III are 14 feet 1 inch long, 8 feet 2 inches wide and 8 feet 8 inches  
27 high. The TRUPACT-III is specifically certified to safely transport TRU wastes packaged in an  
28 SLB2.

29 This package, unlike the TRUPACT-II or HalfPACT, is horizontally loaded and ~~will be~~is  
30 unloaded horizontally as well.

31 The TRUPACT-III has a bolted overpack cover that is secured to the TRUPACT-III container.

32 The maximum weight of a TRUPACT-III is 55,116 ~~lbs-lb~~ (25,000 kg) when loaded with the  
33 maximum allowable contents of 11,486 ~~lbs-lb~~ (5,210 kg).

#### 34 Unloading Docks

35 Each TRUDOCK is designed to accommodate up to two ~~Contact-Handled Packages~~CH  
36 ~~packages~~. The TRUDOCK functions as a work platform, providing TRU mixed waste handling  
37 personnel easy access to the container during unloading operations (see Figure ~~M-12A1-1a~~)

1 ~~(Also see Drawing 41-M-001-W in Appendix D3 of the WIPP RCRA Part B Permit Application~~  
2 ~~(DOE, 1997a)).~~

3 The ~~payload-Payload transfer-Transfer station-Station~~ serves as the unloading dock for  
4 TRUPACT-III and can accommodate a single TRUPACT-III package (see Figure M-20).

#### 5 Forklifts

6 Forklifts may be used to transfer the ~~Contact-Handled Packages~~CH packages into the WHB  
7 Unit and may be used to transfer palletized CH TRU mixed waste containers to the ~~facility~~  
8 Facility transfer-Transfer vehicleVehicle. Another forklift ~~will be~~is used for general-purpose  
9 transfer operations. This forklift has attachments and adapters to handle individual TRU mixed  
10 waste containers, if required.

#### 11 Cranes, Unloading Devices, and ~~Adjustable Center of Gravity~~Lift Fixtures

12 At each TRUDOCK, an overhead bridge crane is used with a specially designed lift fixture for  
13 ~~disassembly-removing the lids and contents~~ of the ~~Contact-Handled Packages~~CH packages.  
14 Separate lifting attachments have been specifically designed to accommodate SWBs and  
15 TDOPs. ~~The lift fixture, attached to the crane, has built-in level indicators and two~~  
16 ~~counterweights that can be moved to adjust the center of gravity of unbalanced loads and to~~  
17 ~~keep them level.~~

18 The TRUPACT-III is unloaded horizontally in Room 108. The Payload Transfer Station, Yard  
19 Transfer Vehicle, ~~and~~ Facility Transfer Vehicle, or forklift are used to perform the unloading and  
20 movement functions. The Payload Transfer Station includes retractable arms that are used to  
21 position the SLB2 onto the Facility Transfer Vehicle and facility pallet.

#### 22 Facility or Containment Pallets

23 The facility pallet is a fabricated steel unit designed to support ~~7seven-~~packs, ~~4four-~~packs, or  
24 ~~3three-~~packs of drums, SWBs, TDOPs, ~~or an~~ SLB2, ~~or shielded container assemblies and has a~~  
25 ~~rated load of 25,000 lbs. (11,430 kg)~~. The facility pallet ~~will~~can accommodate up to four ~~7seven-~~  
26 ~~packs, four 3three-~~packs, or four ~~4four-~~packs of drums; ~~four SWBs (in two stacks of two units);~~;  
27 ~~two TDOPs;~~ ~~or an one~~ SLB2; ~~or two shielded container three-pack assemblies~~. Loads are  
28 secured to the facility pallet during transport to the emplacement area. Facility pallets are shown  
29 in Figure ~~M-21~~A1-10. Fork pockets in the side of the pallet allow the facility pallet to be lifted and  
30 transferred by forklift to prevent direct contact between TRU mixed waste containers and forklift  
31 tines. This arrangement reduces the potential for puncture accidents. Facility pallets may also  
32 be moved by facility transfer vehicles. WIPP facility operational documents define the  
33 operational load of the facility pallet to ensure that the rated load of a facility pallet is not  
34 exceeded.

35 Containment pallets are fabricated units having a containment capacity of at least ten percent of  
36 the volume of the containers and designed to support a minimum of either a single drum, a  
37 single SWB or a single TDOP. The pallets ~~will~~have a rated load capacity of equal to or greater  
38 than the gross weight limit of the container(s) to be supported on the pallet. Loads are secured  
39 to the containment pallet during transport. A typical containment pallet is shown in Figure ~~M-~~  
40 ~~22~~A1-10a. Fork pockets in the side of the pallet allow the containment pallet to be lifted and

1 transferred by forklift. WIPP facility operational documents define the operational load of the  
2 containment pallet to assure that the rated load of a containment pallet is not exceeded.

### 3 Facility Transfer Vehicle

4 The ~~facility~~Facility transfer~~Transfer vehicle~~Vehicle is an electric battery ~~or electric~~-powered  
5 automated vehicle ~~that either operates on tracks or has~~with an on-board guidance system that  
6 allows the vehicle to operate on the floor of the WHB. It has a feature that allows it to lower  
7 integrated rail wheels so that it can operate on the Waste Hoist tracks. It is designed with a flat  
8 bed that has adjustable height capability and that may be used to transfer waste payloads  
9 placed on facility pallets on or off the facility pallet stands in the CH Bay storage area, ~~and on~~  
10 ~~and off~~ or the ~~waste~~Waste shaft~~Shaft conveyance~~Conveyance by raising and lowering the bed  
11 (see Figure M-23A1-11).

### 12 Yard Transfer Vehicle

13 The Yard Transfer Vehicle (Figure M-24A1-35) is an electric battery-powered vehicle that  
14 transports the TRUPACT-III shipping container from the PAU into the WHB and into Room 108.  
15 ~~The Yard Transfer Vehicle is an electric vehicle with a load capacity of 60,000 pounds.~~

### 16 RH TRU Mixed Waste

17 The RH TRU mixed waste is handled and stored in the RH Complex of the WHB Unit which  
18 comprises the following locations: RH Bay (~~12,552 ft<sup>2</sup> (1,166 m<sup>2</sup>)~~), the Cask Unloading Room  
19 (~~382 ft<sup>2</sup> (36 m<sup>2</sup>)~~), the Hot Cell (~~1,841 ft<sup>2</sup> (171 m<sup>2</sup>)~~), the Transfer Cell (~~1,003 ft<sup>2</sup> (93 m<sup>2</sup>)~~) (Figures  
20 M-1 and M-13 through M-15A1-17a, b and c), and the Facility Cask Loading Room (~~1,625 ft<sup>2</sup>~~  
21 ~~(151 m<sup>2</sup>)~~) (Figure M-16A1-17d). The maximum storage capacities of each of these locations are  
22 prescribed in Permit Part 3, Table 3.1.1.

23 The RH Bay (Figure M-13A1-14a) is a high-bay area for receiving casks and subsequent  
24 handling operations. The trailer carrying the RH-TRU 72-B or CNS 10-160B shipping cask  
25 (Figures M-25 through M-28A1-18, A1-19, A1-20 and A1-21) enters the RH Bay through a set of  
26 double doors on the east side of the WHB. The RH Bay houses the Cask Transfer Car. The RH  
27 Bay is served by the RH Bay Overhead Bridge Crane used for cask handling and maintenance  
28 operations. Storage in the RH Bay occurs in the RH-TRU 72-B or CNS 10-160B casks. The  
29 storage occurs after the trailer containing the cask is moved into the RH Bay and prior to moving  
30 the cask into the Cask Unloading Room to stage the waste for disposal operations. ~~A maximum~~  
31 ~~of two loaded casks and one 55-gallon drum for derived waste (156 ft<sup>3</sup> (4.4 m<sup>3</sup>)) may be stored~~  
32 ~~in the RH Bay.~~

33 The Cask Unloading Room (Figure M-13A1-17a) provides for transfer of the RH-TRU 72-B cask  
34 to the Transfer Cell, or the transfer of drums from the CNS 10-160B cask to the Hot Cell.  
35 Storage in the Cask Unloading Room ~~will occur~~occurs in the RH-TRU 72-B or CNS 10-160B  
36 casks. Storage in this area typically occurs to facilitate operations during a shift, at the end of a  
37 shift, or in an off-normal event that results in the suspension of waste handling operations. ~~A~~  
38 ~~maximum of one cask (74 ft<sup>3</sup> (2.1 m<sup>3</sup>)) may be stored in the Cask Unloading Room.~~

39 The Hot Cell (Figure M-14A1-17b) is a concrete shielded room in which drums of RH TRU  
40 mixed waste ~~will be~~are transferred remotely from the CNS 10-160B cask, staged in the Hot Cell,  
41 and loaded into a Facility Canister. The loaded Facility Canister is then lowered from the Hot

1 Cell into the Transfer Cell Shuttle Car containing a Shielded Insert. Storage in the Hot Cell  
2 occurs in either drums or Facility Canisters. Drums that are stored are either on the drum  
3 carriage unit that was removed from the CNS 10-160B cask or in ~~a~~ Facility Canisters. ~~A~~  
4 ~~maximum of 12 55-gallon drums and one 55-gallon drum for derived waste (94.9 ft<sup>3</sup> (2.7 m<sup>3</sup>))~~  
5 ~~may be stored in the Hot Cell.~~

6 The Transfer Cell (Figure M-15A1-17e) houses the Transfer Cell Shuttle Car, which moves the  
7 RH-TRU 72-B cask or Shielded Insert into position for transferring the canister to the Facility  
8 Cask. Storage in this area typically occurs to facilitate operations during a shift, at the end of a  
9 shift, or in an off-normal event that results in the suspension of a waste handling evolution. ~~A~~  
10 ~~maximum of one canister (31.4 ft<sup>3</sup> (0.89 m<sup>3</sup>)) may be stored in the Transfer Cell in the Transfer~~  
11 ~~Cell Shuttle Car.~~

12 The Facility Cask Loading Room (Figure M-16A1-17d) provides for transfer of a canister to the  
13 Facility Cask (Figure M-29) for subsequent transfer to the ~~waste~~ Waste shaft ~~Shaft conveyance~~  
14 Conveyance and to the Underground Hazardous Waste Disposal Unit (HWDU). The Facility  
15 Cask Loading Room also functions as an air lock between the Waste Shaft and the Transfer  
16 Cell. Storage in this area typically occurs to facilitate operations during a shift, at the end of a  
17 shift, or in an off-normal event that results in the suspension of waste handling operations. ~~A~~  
18 ~~maximum of one canister (31.4 ft<sup>3</sup> (0.89 m<sup>3</sup>)) may be stored in the Facility Cask (Figure A1-23)~~  
19 ~~in the Facility Cask Loading Room.~~

20 Following is a description of major pieces of equipment that are used to manage RH TRU mixed  
21 waste in the WHB Unit. A summary of equipment capacities, as required by 20.4.1.500 NMAC,  
22 is included in Table A1-3.

### 23 Casks

24 The RH-TRU 72-B cask (Figure M-27A1-20) is a ~~cylinder~~ cylindrical ~~designed to meet U.S.~~  
25 ~~Department of Transportation (DOT) NRC-certified~~ Type B shipping container ~~package designed~~  
26 to meet the applicable requirements of 10 CFR Part 71. It consists of a separate ~~inner~~  
27 Containment Vessel (ICV) ~~inner vessel~~ within a stainless steel, lead-shielded outer cask  
28 protected by impact limiters at each end, made of ~~stainless steel~~ stainless-steel skins filled with  
29 polyurethane foam. The ~~ICV~~ inner vessel is made of stainless steel and provides an internal  
30 containment boundary and a cavity for the payload. Neither the outer cask nor the ~~ICV~~ inner  
31 vessel is vented. Payload capacity of each RH-TRU 72-B shipping cask is 8,000 lbs (3,628 kg).  
32 The payload consists of a canister of RH TRU mixed waste, which may contain up to 31.4 ft<sup>3</sup>  
33 (0.89 m<sup>3</sup>) of directly loaded waste or waste in smaller containers.

34 The CNS 10-160B cask (Figure M-28A1-21) is ~~designed to meet DOT~~ an NRC-certified Type B  
35 container package designed to meet the applicable requirements of 10 CFR Part 71. ~~and it~~  
36 consists of two carbon steel shells and a lead shield, welded to a carbon steel bottom plate. A  
37 12-gauge stainless steel thermal shield surrounds the cask outer shell, which is equipped with  
38 two steel-encased, rigid polyurethane foam impact limiters attached to the top and bottom of the  
39 cask. The CNS 10-160B cask is not vented. Payload capacity of each CNS 10-160B cask is  
40 14,500 lbs (6,577 kg). The payload consists of up to ten ~~55-gallon-gal~~ (208-L) drums.



### 1 Shielded Insert

2 The Shielded Insert (Figure [M-30A1-30](#)) is specifically designed to be used in the Transfer Cell  
3 to hold and transport loaded Facility Canisters from the Hot Cell until loaded into the Facility  
4 Cask. The Shielded Insert, designed and constructed similar to the RH-TRU 72-B shipping  
5 cask, has a 29 in. inside diameter with an inside length of 130.5 in. ([331.5 cm](#)) to accommodate  
6 the Facility Canister, ~~which is 28.5 in. in diameter by 117.5 in. long~~. The Shielded Insert is  
7 installed on and removed from the Transfer Cell Shuttle Car in the same manner as the RH-  
8 TRU 72-B shipping cask.

### 9 CNS 10-160B Drum Carriage

10 The CNS 10-160B drum carriage (Figure [M-31A1-25](#)) is a steel device used to handle drums in  
11 the CNS 10-160B cask. The drum carriages are stacked two high in the CNS 10-160B cask  
12 during shipment. They are removed from the cask using a below-the-hook lifting device termed  
13 a pentapod. The drum carriage is rated to lift up to five drums ~~with a maximum weight of 1000~~  
14 ~~pounds each~~.

### 15 RH Bay Overhead Bridge Crane

16 In the RH Bay, an overhead bridge crane is used to lift the cask from the trailer and place it on  
17 the Cask Transfer Car. It is also used to remove the impact limiters from the casks and [may be](#)  
18 [used to remove](#) the outer lid of the RH-TRU 72-B cask.

### 19 Cask Lifting Yoke

20 The lifting yoke is a lifting fixture that attaches to the RH Bay Overhead Bridge Crane and is  
21 designed to lift and rotate the RH-TRU 72-B cask onto the Cask Transfer Car.

### 22 Cask Transfer Cars

23 The Cask Transfer Cars (Figures [M-32A1-22a](#) and [M-33A1-22b](#)) are self-propelled, rail-guided  
24 vehicles that transport casks between the RH Bay and the Cask Unloading Room.

### 25 6.25 Ton Grapple Hoist

26 A 6.25 Ton Grapple Hoist is used to hoist the canister from the Transfer Cell Shuttle Car into the  
27 Facility Cask.

### 28 Facility Canister

29 The Facility Canister is a cylindrical container designed to hold three 55-~~gallon gal~~ ([208-L](#))  
30 drums of either RH TRU waste or dunnage (Figure [M-9A1-16](#)).

### 31 Facility Cask

32 The Facility Cask, ~~or Light Weight Facility Cask~~, body consists of two concentric steel cylinders.  
33 The annulus between the cylinders is filled with lead, and gate shield valves are located at  
34 either end. Figure [M-29A1-23](#) provides an outline configuration of the Facility Cask. The canister  
35 is placed inside the Facility Cask for shielding during canister transfer from the RH Complex to  
36 the Underground HWDU for emplacement.

1 Facility Cask Transfer Car

2 The Facility Cask Transfer Car (Figure M-34A1-24) is a self-propelled rail car that is used to  
3 move the Facility Cask between the Facility Cask Loading Room and the Shaft Station in the  
4 underground.

5 Hot Cell Bridge Crane

6 The Hot Cell Bridge Crane, outfitted with a rotating block and the Hot Cell Facility Grapple, ~~will~~  
7 ~~be~~ is used to lift the CNS 10-160B lid and the drum carriage units from the cask located in the  
8 Cask Unloading Room, into the Hot Cell. The Hot Cell Bridge Crane is also used to lift the  
9 empty Facility Canisters into place within the Hot Cell, move loaded drums into the Facility  
10 Canister, and lower loaded Facility Canisters into the Transfer Cell.

11 Overhead Powered Manipulator

12 The Overhead Powered Manipulator is used in the Hot Cell to lift individual drums from the drum  
13 carriage unit and lower each drum into the Facility Canister and support miscellaneous Hot Cell  
14 operations.

15 Manipulators

16 There is a maximum of two operational sets of fixed Manipulators in the Hot Cell. The  
17 Manipulators are used to collect swipes of drums as they are being lifted from the drum carriage  
18 unit, ~~and~~ transfer the swipes to the Shielded Material Transfer Drawer for pertinent analysis, and  
19 support Hot Cell operations.

20 Shielded Material Transfer Drawer

21 The Shielded Material Transfer Drawer is used to transfer swipe samples obtained by the fixed  
22 Manipulators to the Hot Cell Gallery for radiological counting and transferring small equipment  
23 into and out of the Hot Cell.

24 Closed-Circuit Television Cameras

25 The Closed-Circuit Television Camera system is used to monitor operations throughout the Hot  
26 Cell and Transfer Cell. These cameras are used to perform inspections of waste containers and  
27 waste management areas. This camera system is operated from the shielded room in the  
28 Facility Cask Loading Room, Cask Unloading Room, and Hot Cell Gallery. The camera system  
29 has a video recording capability as an operational aid.

30 Transfer Cell Shuttle Car

31 The Transfer Cell Shuttle Car (Figure M-35A1-34) positions the loaded RH-TRU 72-B cask and  
32 Shielded Insert within the Transfer Cell.

33 Cask Unloading Room Crane

34 The Cask Unloading Room Crane lifts and suspends the RH-TRU 72-B cask or Shielded Insert  
35 from the Transfer Car and lowers the cask or Shielded Insert into the Transfer Cell Shuttle Car.

## 1 Facility Cask Rotating Device

2 The Facility Cask Rotating Device, a floor mounted hydraulically operated structure, is designed  
3 to rotate the Facility Cask from the horizontal position to the vertical position for waste canister  
4 loading and then back to the horizontal position after the waste canister has been loaded into  
5 the Facility Cask (Figure M-36A1-32).

## 6 A1-1c(2) Parking Area Container Storage Unit (Parking Area UnitPAU)

7 The parking area south of the WHB (see Figure M-2A1-2) ~~will be~~ used for storage of waste  
8 containers within sealed shipping containers awaiting unloading. The area extending south from  
9 the WHB within the security-fenced enclosure identified as the Controlled Area ~~on Figure A1-2~~  
10 is defined as the Parking Area UnitPAU. Concrete barriers provide protection from vehicles and  
11 equipment for the interior of the south side of the WHB. The Parking Area UnitPAU provides  
12 storage space for up to 6,734 ft<sup>3</sup> (191 m<sup>3</sup>) of TRU mixed waste, contained in up to 40 loaded  
13 ~~Contact Handled PackagesCH packages~~ and ~~eight Remote Handled PackagesRH packages~~.  
14 Secondary containment and protection of the waste containers from standing liquid are provided  
15 by the ~~Contact Handled or Remote Handled PackagingCH or RH packaging~~. Wastes placed in  
16 the Parking Area UnitPAU ~~will remain sealed in their Contact Handled or Remote Handled~~  
17 ~~PackagesCH or RH packages, at all times~~ while in this area.

18 The ~~Nuclear Regulatory Commission (NRC)~~NRC Certificate of Compliance requires that sealed  
19 ~~Contact Handled or Remote Handled PackagesCH or RH packages which contain~~containing  
20 waste be vented every 60 days to avoid unacceptable levels of internal pressure. ~~During normal~~  
21 ~~operations the maximum residence time of any one container in the Parking Area Unit is~~  
22 ~~typically five days. Therefore, during normal waste handling operations, no Contact Handled or~~  
23 ~~Remote Handled Packages will require venting while located in the Parking Area Unit.~~ Any off-  
24 normal event which results in the need to store a waste container in the Parking Area UnitPAU  
25 for a period of time approaching ~~fifty nine (59)~~ days shall be handled in accordance with Section  
26 A1-1e(2) of this Permit Attachment. Under no circumstances shall a ~~Contact Handled or~~  
27 ~~Remote Handled PackageCH or RH package~~ be stored in the Parking Area UnitPAU for more  
28 than ~~fifty nine (59)~~ days after the date that ~~the~~ ICV of the Contact Handled or Remote Handled  
29 PackageCH or RH package was sealed at the generator site, ~~as recorded in the~~ Inner  
30 Containment Vessel (ICV) Closure Date field of the WIPP Waste Information System (WWIS)  
31 database.

## 32 Parking Area Unit Surge Storage Area

33 The Permittees ~~will~~ coordinate shipments with the generator/storage sites in an attempt to  
34 minimize the use of surge storage. However, there may be circumstances causing shipments to  
35 arrive that would exceed the maximum capacity of the Parking AreaPAU, as specified in Permit  
36 Part 3, Table 3.1.2, Parking Area Unit. The Permittees may use the Parking AreaPAU Surge  
37 Storage Area as specified in Permit Part 3, Section 3.1.2.3 (see Figure M-2A1-2) only when the  
38 maximum capacity in the Parking AreaPAU is reached and at least one of the following  
39 conditions is met:

- 40 • Surface or underground waste handling equipment malfunctions prevent the  
41 Permittees from moving waste to disposal locations;



- 1 • Hoisting or underground ventilation equipment malfunctions prevent the Permittees  
2 from moving waste into the underground;
- 3 • Power outages cause a suspension of waste emplacement activities;
- 4 • Inbound shipment delays are imminent because the Parking AreaPAU is full ~~(not~~  
5 ~~applicable to RH TRU waste shipments)~~; or
- 6 • Onsite or offsite emergencies cause a suspension of waste emplacement activities.

7 The Permittees must notify NMED and those on the e-mail notification list (as specified in Permit  
8 Part 1, Sections 1.11; and Permit Part 3, Section 3.1.2.4) upon using the Parking AreaPAU  
9 Surge Storage Area and provide justification for its use.

#### 10 A1-1d Container Management Practices

11 20.4.1.500 NMAC (incorporating 40 CFR §264.173) requires that containers be managed in a  
12 manner that does not result in spills or leaks. ~~Containers are required to be closed at all times,~~  
13 ~~unless waste is being placed in the container or removed.~~ Because containers at the WIPP  
14 ~~facility will~~ contain radioactive waste, safety concerns require that containers be continuously  
15 vented to ~~obviate prevent~~ the buildup of gases within the container. These gases could result  
16 from radiolysis, which is the breakdown of moisture by radiation. The vents, ~~which are nominally~~  
17 ~~0.75 in. (1.9 centimeters [cm]) in diameter,~~ are generally installed on or near the lids of the  
18 containers. These vents are filtered so that gas can escape while radioactive particulates are  
19 retained.

20 TRU mixed waste containers, containing off-site waste, are never opened at the WIPP facility.  
21 Derived waste containers are kept closed at all times unless waste is being added or removed.

22 Off-normal (unplanned) events could interrupt normal operations in the waste management  
23 process line. Shipments of waste from the generator sites will be stopped in an off-normal event  
24 which results in an interruption to normal waste handling operations that exceeds three days  
25 and could potentially cause the maximum permitted storage capacities and/or time limits to be  
26 exceeded. These off-normal events typically fall into the following categories:

- 27 • Waste management system equipment malfunctions that prevent unloading or  
28 downloading waste to the underground
- 29 • Waste shipments with unacceptable levels of surface contamination that prevent  
30 unloading or downloading waste to the underground
- 31 • Hazardous Waste Manifest discrepancies that are not immediately resolved and  
32 prevent unloading or downloading waste to the underground
- 33 • A suspension of emplacement activities for regulatory reasons

34 ~~Shipments of waste from the generator sites will be stopped in any event which results in an~~  
35 ~~interruption to normal waste handling operations that exceeds three days.~~

36 ~~Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly~~  
37 ~~trained in the safe use of TRU mixed waste handling and transport equipment. The training will~~  
38 ~~include both classroom training and on-the-job training.~~

1 A1-1d(1) Derived Waste

2 The WIPP facility operational philosophy is to introduce no new hazardous chemical  
3 components into TRU mixed waste or TRU mixed waste residues that could be present in the  
4 controlled area. This ~~will be~~ accomplished principally through written procedures and the use  
5 of Safe Work Permits (SWP)<sup>1</sup> and Radiological Work Permits (RWP)<sup>2</sup> which govern the  
6 activities within a controlled area involving TRU mixed waste. The purpose of this operating  
7 philosophy is to avoid generating TRU mixed waste that is compositionally different than the  
8 TRU mixed waste shipped to the WIPP facility for disposal.

9 Some additional TRU mixed waste, such as used personal protective equipment, swipes, and  
10 tools, may result from decontamination operations and off-normal events. Such waste will be  
11 assumed to be contaminated with RCRA-regulated hazardous constituents in the TRU mixed  
12 waste containers from which it was derived. Derived waste may be generated as the result of  
13 decontamination activities during the waste handling process. Should radiological  
14 decontamination activities be performed, the work will be conducted consistent with radiological  
15 control procedures pursuant to 10 CFR Part 835. For decontamination of hazardous waste  
16 constituents, water and a cleaning agent such as those listed in Permit Attachment D will be  
17 used. Derived waste will be considered acceptable for management at the WIPP facility,  
18 because any TRU mixed waste shipped to the facility will have already been determined to be  
19 acceptable and because no new hazardous waste constituents will be added. Data on the  
20 derived waste will be entered into the WWIS database. Derived waste will be contained in  
21 standard DOT approved Type A containers.

22 ~~The Safety Analysis Report (DOE 1997b) for packaging requires the lids of TRU mixed waste~~  
23 ~~containers to be vented through high efficiency particulate air (HEPA) grade filters to preclude~~  
24 ~~container pressurization caused by gas generation and to prevent particulate material from~~  
25 ~~escaping. Filtered vents used in CH TRU mixed waste containers (55-gal (208-L) drums, 85-gal~~  
26 ~~(322 L) drums, 100-gal (379-L) drums, TDOPs, and SWBs) have an orifice approximately 0.375-~~  
27 ~~in. (9.53 millimeters) in diameter through which internally generated gas may pass. The filter~~  
28 ~~media can be any material (e.g., composite carbon, sintered metal).~~

29 As each derived waste container is filled, it ~~will be~~ closed with a lid containing a high efficiency  
30 particulate air (HEPA)-grade filter and moved to an Underground Hazardous Waste Disposal  
31 Unit (HWDU) HWDU using the same equipment used for handling TRU mixed waste.

32 A1-1d(2) CH TRU Mixed Waste Handling

33 CH Contact-handled TRU mixed waste containers ~~will~~ arrive by tractor-trailer at the WIPP facility  
34 in sealed shipping containers (e.g., TRUPACT-IIs, HalfPACTs, or TRUPACT-IIIs) (see Figure

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<sup>1</sup> SWPs are prepared to assure that any hazardous work (not already covered by a procedure) is performed with due precaution. SWPs are issued by the Permittees after a job supervisor completes the proper form detailing the job location, work description, personnel involved, specific hazards involved, and protective requirements. The Permittees review the form, check on the adequacy of the protective measures, and if sufficient, approve the work permit. Conditions of the SWPs must be met while any hazardous work is proceeding. Examples of activities covered by the SWP program include confined space entry, overhead work, and work on energized equipment.

<sup>2</sup> RWPs are used to control entry into and performance of work within a controlled area (CA). Managers responsible for work within a CA must generate a work permit that specifies the work scope, limiting conditions, dosimetry, respiratory protection, protective clothing, specific worker qualifications, and radiation safety technician support. RWPs are approved by the Permittees after thorough review. No work can proceed in a CA without a valid RWP.

1 ~~M-37A1-12~~. Prior to unloading the packages from the trailer, they ~~will~~ undergo security and  
2 radiological checks and shipping documentation reviews. A forklift ~~will~~ removes the ~~Contact-~~  
3 ~~Handled Packages~~CH packages which ~~will be~~ transported by forklift or Yard Transfer Vehicle  
4 through an air lock that is designed to maintain differential pressure in the WHB. The forklift ~~will~~  
5 places the shipping containers at either one of the two TRUDOCKs in the TRUDOCK Storage  
6 Area of the WHB Unit, or the Yard Transfer Vehicle ~~will~~ locates the TRUPACT-III at the bolting  
7 station in Room 108. An external survey of the ~~Contact-Handled Package~~CH package ~~Inner~~  
8 ~~Containment Vessel (ICV) lid~~ (Figure ~~M-17A1-8a~~ and ~~M-18A1-8b~~) ~~will be~~ performed as the  
9 Outer Confinement Vessel (OCV) lid is removed. The ICV lid or closure lid ~~will be~~ lifted under  
10 the Vent Hood System (VHS), and the contents ~~will be~~ surveyed during and after this  
11 process is complete. The VHS<sup>3</sup> is attached to the ~~Contact-Handled Package~~CH package to  
12 provide atmospheric control and confinement of headspace gases at their source. It also  
13 prevents potential personnel exposure and facility contamination due to the spread of  
14 radiologically contaminated airborne dust particles and minimizes personnel exposure to VOCs.

15 Contamination surveys at the WIPP facility are based in part on radiological surveys used to  
16 indicate potential releases of hazardous constituents from containers by virtue of detection of  
17 radioactive contamination (see Permit Attachment G3). Radiological surveys may be applicable  
18 to most hazardous constituent releases except the release of gaseous VOCs from TRU mixed  
19 waste containers. Radiological surveys provide the WIPP facility with a very sensitive method of  
20 indicating the potential release of nongaseous hazardous constituents through the use of  
21 surface sampling (swipes) and radioactivity counting. Radiological surveys are used in addition  
22 to the more conventional techniques such as visual inspection to identify spills.

23 Under normal operations, it is not expected that the waste containers will be externally  
24 contaminated ~~pursuant to 10 CFR Part 835 or that removable surface contamination on the~~  
25 ~~shipping package or the waste containers will be in excess of the DOE's free release limits (i.e.,~~  
26 ~~< 20 disintegrations per minute (dpm)<sup>4</sup> per 100 cm<sup>2</sup> alpha or < 200 dpm per 100 cm<sup>2</sup>~~  
27 ~~beta/gamma). In such a case, no further decontamination action is needed. The shipping~~  
28 ~~package and waste container will be handled through the normal process. However, should the~~  
29 ~~magnitude of there be contamination in excess exceed the free release of the radiological control~~  
30 ~~limits pursuant to 10 CFR Part 835, yet still fall within the criteria for small area "spot"~~  
31 ~~decontamination (i.e., less than or equal to 100 times the free release limit and less than or~~  
32 ~~equal to 6 ft<sup>2</sup> [0.56 m<sup>2</sup>]), the shipping package or the waste container will be~~  
33 ~~decontaminated managed in accordance with radiological control procedures pursuant to 10~~  
34 ~~CFR Part 835. Decontamination activities will not be conducted on containers which that are not~~

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<sup>3</sup> The TRU mixed waste container headspace may contain radiologically contaminated airborne dust particles.

1. Without the VHS, a potential mechanism will exist to spread contamination (if present) in the immediate CH TRU mixed waste handling area, because lid removal will immediately expose headspace gases to prevailing air currents induced by the building ventilation system.

2. With the VHS, a confined and controlled set of prevailing air currents will be induced by the system blower. The VHS will function as a local exhaust system to effectively control radiologically contaminated airborne dust particles (and VOCs) at essentially atmospheric pressure conditions.

Functionally, the VHS will draw the TRU mixed waste container headspace gases, convey them through a HEPA filter, and ultimately duct them through the WHB exhaust ventilation system. VOCs will pass through the HEPA filter and will be conveyed to the ventilation exhaust duct system. The system principally consists of a functional aggregation of 1) vent hood assembly, 2) HEPA filter assemblies (to capture any airborne radioactive particles), 3) blower (to provide forced airflow), 4) ductwork, and 5) flexible hose.

<sup>4</sup> The unit "dpm" stands for "disintegration per minute" and is the rate of emission by radioactive material as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

1 in good condition, or ~~containers which~~ are leaking. Containers ~~which that~~ are not in good  
2 condition, and containers ~~which that~~ are leaking, will be overpacked (if applicable) in an  
3 approved container, repaired/patched in accordance with 49 CFR §173 and §178 (e.g., 49 CFR  
4 §173.28), or appropriate standards and guidance (e.g., 49 CFR §173.28), returned to the  
5 generator, or sent to a third-party contractor. In addition, if during the waste handling process at  
6 the WIPP facility, a waste container is breached, it will be overpacked (if applicable) in an  
7 approved container, repaired/patched in accordance with 49 CFR §173 and §178 (e.g., 49 CFR  
8 §173.28), or returned to the generator appropriate standards and guidance (e.g., 49 CFR  
9 §173.28), or managed in accordance with radiological control procedures pursuant to 10 CFR  
10 Part 835. The overpacked or repaired container will be labeled and emplaced in an underground  
11 HWDU for disposal. Should WIPP facility structures or equipment become contaminated, waste  
12 handling operations in the affected area will be ~~immediately suspended~~managed in accordance  
13 with standard operating procedures, and the contaminated structures or equipment will be  
14 managed consistent with radiological control procedures pursuant to 10 CFR Part 835.

15 Hazardous waste decontamination activities will use water and cleaning agents (see Permit  
16 Attachment D) so as to not generate any waste that cannot be considered derived waste. Items  
17 that are radiologically contaminated are also assumed to be contaminated with the hazardous  
18 wastes that are in the container involved in the spill or release. A complete listing of these waste  
19 components can be obtained from the ~~WIPP Waste Information System (WWIS)~~WWIS, as  
20 described in Permit Attachment C, for the purpose of characterizing derived waste.

21 It is assumed that the process of localized surface decontamination will remove the hazardous  
22 waste constituents along with the radioactive waste constituents. Therefore, waste containers  
23 will be emplaced in the underground HWDUs without further action once localized radiological  
24 contamination is removed unless there is visible evidence of hazardous waste spills or  
25 hazardous waste on the container. Hazardous waste decontamination will be conducted, if  
26 necessary, in accordance with the requirements of the Permit and the standards of 20.4.1.500  
27 NMAC (incorporating 40 CFR Part 264).~~To provide verification of the effectiveness of the~~  
28 ~~removal of hazardous waste constituents, once a contaminated surface is demonstrated to be~~  
29 ~~radiologically clean, the "swipe" will be sent for analysis for hazardous constituents. The use of~~  
30 ~~these confirmation analyses is as follows:~~

31 ~~**For waste containers**, the analyses becomes documentation of the condition of the container~~  
32 ~~at the time of emplacement. The presence of hazardous waste constituents on a container after~~  
33 ~~decontamination will be at trace levels and will likely not be visible and will not pose a threat to~~  
34 ~~human health or the environment. These containers will be placed in the underground without~~  
35 ~~further action once the radiological contamination is removed unless there is visible evidence of~~  
36 ~~hazardous waste spills or hazardous waste on the container and this contamination is~~  
37 ~~considered likely to be released prior to emplacement in the underground.~~

38 ~~**For area contamination**~~In the event of area contamination, a radiological boundary will be  
39 established in accordance with radiological control procedures. Inside this boundary, cleanup  
40 activities are controlled with protocols for the cleanup of spills and releases. As dictated by  
41 cleanup protocols, decontamination will be managed consistent with radiological control  
42 procedures pursuant to 10 CFR Part 835. ~~once~~Once the area is cleaned up and is shown to be  
43 radiologically clean, it will be sampled for the presence of hazardous waste residues. Hazardous  
44 waste decontamination will be conducted in accordance with the requirements of the Permit and  
45 the standards of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). If the area is large, a  
46 sampling plan will be developed, as needed, which incorporates the guidance of ~~EPA's SW-846~~

1 (EPA, 2015) in selecting random samples over large areas. Selection of constituents for  
2 sampling analysis will be based on information (in the WWIS) about the waste that was spilled  
3 and information on cleanup procedures. ~~If the area is small, swipes will be used.~~ If the results of  
4 the analysis show that residual contamination remains, a decision will be made whether further  
5 cleaning will be beneficial or whether final ~~clean-up~~clean-up shall will be deferred until closure.  
6 ~~For example, if hazardous constituents react with the floor coating and are essentially~~  
7 ~~nonremovable without removing the coating, then clean up will be deferred until closure when~~  
8 ~~the coatings will be stripped. In any case, appropriate~~Appropriate notations will be entered into  
9 the ~~operating~~Operating record~~Record~~ to assure proper consideration of formerly contaminated  
10 areas at the time of closure. Furthermore, measures such as covering, barricading, and/or  
11 placarding will be used as needed to mark areas that remain contaminated.

12 ~~Small area decontamination, if needed, will occur in the area in which it is detected for~~  
13 ~~contamination that is less than 6 ft<sup>2</sup> (0.56 m<sup>2</sup>) in area and is less than 100 times the free release~~  
14 ~~limit. The free release limit is defined by DOE Orders as alpha contamination less than 20~~  
15 ~~dpm/100 cm<sup>2</sup> and beta gamma contamination less than 200 dpm/100 cm<sup>2</sup>. Overpacking would~~  
16 ~~occur in the event the WIPP staff damages an otherwise intact container during handling~~  
17 ~~activities. In such a case, a radiological boundary will be established, inside which all activities~~  
18 ~~are carefully controlled in accordance with the protocols for the cleanup of spills or releases. A~~  
19 ~~plan of recovery will be developed and executed, including overpacking or repairing the~~  
20 ~~damaged container. The overpacked or repaired container will be properly labeled and sent~~  
21 ~~underground for disposal. The area will then be decontaminated and verified to be free of~~  
22 ~~contamination using both radiological and hazardous waste sampling techniques (essentially,~~  
23 ~~this is done with "swipes" of the surface for counting in sensitive radiation detection equipment~~  
24 ~~or, if no radioactivity is present, by analysis for hazardous waste by an offsite laboratory).~~

25 In the event ~~a large~~that extensive area contamination is discovered within a ~~Contact-Handled~~  
26 ~~Package~~CH package during unloading, the waste will be left in the ~~Contact-Handled~~  
27 ~~Package~~CH package and the shipping container will be resealed. The DOE considers such  
28 contamination problems the responsibility of the shipping site. The Permittees must perform a  
29 root cause analysis on generation, transport, or disposal activities for the following reasons: (1)  
30 contamination may have occurred within the shipping container; (2) a shipping container may be  
31 compromised; or (3) at any time when directed by the NMED. Once a root cause analysis is  
32 required on a specific shipment or waste stream, the shipment or waste stream may not be  
33 disposed of at the WIPP facility until the root cause analysis is completed and corrective  
34 measures are implemented to prevent such concerns in the future. Prior to submitting the root  
35 cause analysis and corrective measures to the NMED for review and approval, the Permittees  
36 shall provide a copy of the root cause analysis and corrective measures to all generator/storage  
37 sites that ship waste to the WIPP facility. When submitting the root cause analysis and  
38 corrective measures to the NMED for review and approval, the Permittees shall provide a  
39 certification signed by responsible officials from each organization that the root cause analysis  
40 and corrective measures were received by a responsible official at the generator/storage sites.  
41 ~~Therefore, the shipper will have several options for disposition. These are as follows:~~The  
42 shipping package will be dispositioned according to the following options:

- 43 • The ~~Contact-Handled~~CH Package can be returned to the shipper for decontamination  
44 and repackaging of the waste. Such waste would have to be re-approved prior to  
45 shipment to the WIPP.



- 1 • Shipment to another DOE site for management in the event the original shipper does  
2 not have suitable facilities for decontamination. If the receiving site wishes to return the  
3 waste to WIPP, the site will have to meet the characterization requirements of the  
4 Waste Analysis Plan~~WAP~~.
- 5 • The waste could go to a third (non-DOE) party for decontamination. In such cases, the  
6 repaired shipment would go to the original shipper and be recertified prior to shipment  
7 to the WIPP.

8 Written procedures specify materials, protocols, and steps needed to put an object into a safe  
9 configuration for decontamination of surfaces. ~~A RWP will always be prepared prior to~~  
10 ~~decontamination activities.~~ TRU mixed waste products from decontamination will be managed  
11 as derived waste.<sup>5</sup> and in accordance with radiological control and waste handling procedures.

12 The TRUPACT-II may hold up to two ~~7~~seven-packs, two ~~4~~four-packs, and two ~~3~~three-packs of  
13 drums; two SWBs; or one TDOP. A HalfPACT may hold seven 55-gal (208-L) drums, one  
14 SWB, three shielded containers, or four 85-gallon-gal drums. The TRUPACT-III holds a single  
15 SLB2. An overhead bridge crane or ~~Facility Transfer Vehicle~~Payload Transfer Station ~~will be~~  
16 used to remove the contents of the ~~Contact Handled Package~~CH package and place them on a  
17 facility pallet. ~~The containers will be visually inspected for physical damage (severe rusting,~~  
18 ~~apparent structural defects, signs of pressurization, etc.) and leakage to ensure they are in good~~  
19 ~~condition prior to storage. Waste containers will also be checked for external surface~~  
20 ~~contamination. If a primary waste container is not in good condition, the Permittees will~~  
21 ~~overpack the container, repair/patch the container in accordance with 49 CFR §173 and §178~~  
22 ~~(e.g., 49 CFR §173.28), or return the container to the generator.~~

23 For inventory control purposes, TRU mixed waste container identification numbers ~~will be~~are  
24 ~~verified against the Uniform Hazardous Waste Manifest and the WWIS~~in accordance with  
25 Permit Attachment C, Section C-5b(1). Inconsistencies will be resolved with the generator  
26 before TRU mixed waste is emplaced. Discrepancies that are not resolved within 15 days will be  
27 reported to the NMED in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.72).

28 Each facility pallet has two recessed pockets to accommodate two sets of ~~7~~seven-packs (see  
29 Figure M-21A1-10), two sets of ~~4~~four-packs, two sets of ~~3~~three-packs; ~~or two sets of~~ SWBs  
30 stacked two-high; two TDOPs; two shielded container assemblies, or three-packs; or any  
31 combination thereof. Each facility pallet will accommodate one SLB2. Each stack of waste  
32 containers ~~will be~~is secured prior to transport underground. A forklift or the ~~facility~~Facility  
33 ~~transfer~~Transfer vehicle~~Vehicle~~ will transport the loaded facility pallet to the conveyance  
34 loading room located adjacent to the Waste Shaft. The conveyance loading room serves as an  
35 air lock between the CH Bay and the Waste Shaft, preventing excessive air flow between the  
36 two areas. The ~~facility~~Facility transfer~~Transfer vehicle~~Vehicle ~~will be~~is driven onto the ~~waste~~  
37 Waste shaft~~Shaft conveyance~~Conveyance deck, where the loaded facility pallet ~~will be~~is  
38 transferred to the ~~waste~~Waste shaft~~Shaft conveyance~~Conveyance, and the ~~facility~~Facility  
39 ~~transfer~~Transfer vehicle~~Vehicle~~ ~~will be~~is backed off. Containers of CH TRU mixed waste (55-

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<sup>5</sup>Note that the DOE had previously proposed use of an Overpack and Repair Room to deal with major decontamination and overpacking activities. The DOE has eliminated the need for this area by: 1) limiting the size of contamination events that will be dealt with as described in this section, and 2) by performing overpacking at the point where a need for overpacking is identified instead of moving the waste to another area of the WHB. This strategy minimizes the spread of contamination.

1 gal (208-L) drums, SWBs, 85-gal (322-L) drums, 100-gal (379-L) drums, and TDOPs) or  
2 shielded container assemblies can be handled individually, if needed, using the forklift and lifting  
3 attachments (i.e., drum handlers, parrot beaks).

4 The ~~waste-Waste shaft-Shaft conveyance-Conveyance~~ will lower the loaded facility pallet to the  
5 Underground HWDUs/Waste Shaft Station underground. From there, an underground  
6 transporter is used to transport the CH TRU mixed waste to the underground HWDU. Figures  
7 M-38 and M-39 A1-13 is a are flow diagrams of the CH TRU mixed waste handling process.

#### 8 A1-1d(3) RH TRU Mixed Waste Handling

9 The RH TRU mixed waste that is not in a shielded container will be received in the RH-TRU 72-  
10 B cask or CNS 10-160B cask loaded on a trailer, as illustrated in process flow diagrams in  
11 Figures M-40A1-26 and M-41A1-27, respectively. ~~These are shown schematically in Figures~~  
12 ~~A1-28 and A1-29.~~ Remote-Handled handled TRU mixed waste received in shielded containers  
13 ~~will be~~ managed and stored as CH TRU mixed waste. Prior to unloading the cask from the  
14 trailer, external radiological surveys, security checks, shipping documentation reviews are  
15 performed, and the Uniform Hazardous Waste Manifest is signed. The generator's copy of the  
16 Uniform Hazardous Waste Manifest is returned to the generator. Should the results of the  
17 contamination survey exceed acceptable levels, the shipping cask and transport trailer remain  
18 outside the WHB in the Parking Area UnitPAU, and the appropriate radiological boundaries (i.e.,  
19 ropes, placards) are erected around the shipping cask and transport trailer. A determination will  
20 be made whether to return the cask to the originating site or to decontaminate the cask.

21 Following cask inspections, the shipping cask and trailer are moved into the RH Bay or held in  
22 the Parking Area UnitPAU. The waste handling process begins in the RH Bay where the impact  
23 limiter(s) are removed from the shipping cask while it is on the trailer. Additional radiological  
24 surveys are conducted on the end of the cask previously protected by the impact limiter(s) to  
25 verify the absence of contamination. The cask is unloaded from the trailer using the RH Bay  
26 Overhead Bridge Crane and placed on a Cask Transfer Car.

27 Whenever RH TRU mixed waste is present, Differential-differential air pressure between the RH  
28 TRU mixed waste handling locations in the RH Complex protects workers and prevents  
29 potential spread of contamination during handling of RH TRU mixed waste. Airflow between key  
30 rooms in the WHB is controlled by maintaining differential pressures between the rooms. The  
31 CH Receiving Bay is maintained with a negative pressure relative to outside atmosphere. The  
32 RH Receiving Bay is maintained with a requirement to be positive pressure relative to the CH  
33 Receiving Bay. The RH Hot Cell is maintained with a negative differential pressure relative to  
34 the RH Receiving Bay. The Hot Cell ventilation is exhausted through high-efficiency particulate  
35 air filters prior to venting through the WHB filtered exhaust.

#### 36 RH-TRU 72-B Cask Unloading

37 The Cask Transfer Car ~~then~~ moves the RH-TRU 72-B cask to a work stand in the RH Bay. The  
38 work stand allows access to the head area of the RH-TRU 72-B cask for conducting radiological  
39 surveys, performing physical inspections or minor maintenance, and decontamination, if  
40 necessary. The outer lid bolts on the RH-TRU 72-B cask are removed, and after which the outer  
41 lid is removed to provide access to the lid of the cask ICVinner vessel. The RH-TRU 72-B cask  
42 is moved into the Cask Unloading Room by a Cask Transfer Car and is positioned under the  
43 Cask Unloading Room Bridge Crane. The Cask Unloading Room Bridge Crane attaches to the

1 RH-TRU 72-B cask and lifts and suspends the ~~RH-TRU 72-B~~ cask to clear the Cask Transfer  
2 Car. The suspended RH-TRU 72-B cask is then aligned over the Cask Unloading Room port.

3 The Cask Unloading Room shield valve is opened, and the cask is lowered through the port into  
4 the Transfer Cell Shuttle Car. The Cask Unloading Room Bridge Crane is unhooked and  
5 retracted, and the Cask Unloading Room shield valve is closed. After the cask is lowered into  
6 the Transfer Cell Shuttle Car, the bolts on the lid of the cask ~~ICV-inner vessel~~ are loosened by a  
7 robotic Manipulator. The Transfer Cell Shuttle Car is then aligned directly under the Transfer  
8 Cell shield valve in preparation for removing the ~~ICV-inner-vessel~~ lid and transferring the  
9 canister to the Facility Cask. Operations in the Transfer Cell are monitored by closed-circuit  
10 video cameras.

11 Using the remotely-operated fixed 6.25 Ton Grapple Hoist in the Facility Cask Loading Room,  
12 the ~~ICV-inner-vessel~~ lid is lifted clear of the RH-TRU 72-B cask, and ~~the a~~ robotic Manipulator  
13 takes swipe samples and places them in a swipe delivery system for counting outside the  
14 Transfer Cell. If found to be contaminated above acceptable surface contamination levels as  
15 described in 10 CFR Part 835, the Permittees have the option to decontaminate consistent with  
16 radiological control procedures, ~~or~~ return the RH TRU Canister to the generator/storage site or  
17 another site for remediation, or manage the RH TRU Canister consistent with radiological  
18 control procedures pursuant to 10 CFR Part 835. Hazardous waste decontamination, if needed,  
19 will be conducted in accordance with the requirements of the Permit and the standards of  
20 20.4.1.500 NMAC (incorporating 40 CFR Part 264). If no contamination is found, the Transfer  
21 Cell Shuttle Car moves a short distance, and the ~~ICV-inner-vessel~~ lid is lowered onto a stand on  
22 the Transfer Cell Shuttle Car. ~~The, after which the~~ canister is transferred to the Facility Cask as  
23 described below.

#### 24 CNS 10-160B Cask Unloading

25 After the lid bolts are removed, the CNS 10-160B cask is moved using the Cask Transfer Car  
26 from the RH Bay into the Cask Unloading Room and centered beneath the Hot Cell shield plug  
27 port. The Cask Unloading Room shield door is closed, and the inner and outer Hot Cell shield  
28 plugs are removed simultaneously and set aside on the floor of the Hot Cell using the remotely  
29 operated Hot Cell Bridge Crane. The Hot Cell Bridge Crane is then lowered through the Hot Cell  
30 port and is connected to the CNS 10-160B cask lid rigging or lifting device. The Hot Cell Bridge  
31 Crane lifts the CNS 10-160B cask lid through the Hot Cell port and sets the lid aside on the Hot  
32 Cell floor.

33 Operations in the Hot Cell are monitored by closed-circuit television cameras. The drum  
34 carriage unit lifting fixture (hereafter referred to as lifting fixture) is attached to the Hot Cell  
35 Bridge Crane and lowered through the Hot Cell port. The lifting fixture is connected to the upper  
36 drum carriage unit contained in the CNS 10-160B cask. The Hot Cell Bridge Crane lifts the  
37 upper drum carriage unit from the CNS 10-160B cask through the port into the Hot Cell and sets  
38 it near the Hot Cell inspection station. The Hot Cell Bridge Crane again lowers the lifting fixture  
39 through the Hot Cell port and connects to the lower drum carriage unit. The Hot Cell Bridge  
40 Crane lifts the lower drum carriage unit from the CNS 10-160B cask through the port into the  
41 Hot Cell and sets it near the upper drum carriage unit.

42 The Hot Cell Bridge Crane lifts the CNS 10-160B cask lid from the Hot Cell floor, lowers it  
43 through the Hot Cell port and onto the top of the CNS 10-160B cask. The inner and outer Hot  
44 Cell shield plugs are replaced simultaneously. The Cask Unloading Room shield door is



1 opened, and the CNS 10-160B cask is moved into the RH Bay using the Cask Transfer Car.  
2 The CNS 10-160B cask is inspected and surveyed, the lid and impact limiter are reinstalled on  
3 the CNS 10-160B cask, and it is prepared for transportation off-site.

4 The Hot Cell Bridge Crane connects to an empty Facility Canister, places it into a sleeve at the  
5 inspection station, and removes the canister lid. The Overhead Powered Manipulator or Hot Cell  
6 Crane lifts one drum from the drum carriage unit. The Hot Cell Manipulators collect swipe  
7 samples from the drum and transfer the swipes via the Transfer Drawer to the Hot Cell Gallery  
8 for counting. If the ~~55-gallon-gal (208-L)~~ drums are contaminated, the Permittees may  
9 decontaminate the ~~55-gallon-gal (208-L)~~ drums or return them to the generator/storage site or  
10 another site for remediation. The drum identification number is recorded, and the recorded  
11 numbers are verified against the WWIS. If there are any discrepancies, the drum(s) in question  
12 are stored within the Hot Cell, and the generator/storage site is contacted for resolution.  
13 Discrepancies that are not resolved within 15 days will be reported to the NMED as required by  
14 20.4.1.500 NMAC (incorporating 40 CFR §264.72).

15 Either the Overhead Powered Manipulator or Hot Cell Bridge Crane lowers the drum into the  
16 Facility Canister. This process is repeated to place three drums in the Facility Canister. The Hot  
17 Cell Bridge Crane or powered Manipulator lifts the canister lid and places it onto the Facility  
18 Canister. The lid is locked in place using a Manipulator. Each CNS 10-160B cask shipment will  
19 contain up to ten drums. Drums ~~will beare~~ managed in sets of three. If there is a tenth drum, it  
20 will be placed in a Facility Canister or stored until ~~WIPP~~ receipt of the next CNS 10-160B cask  
21 shipment at the WIPP facility. The Hot Cell Bridge Crane lifts the Facility Canister and lowers it  
22 into the Transfer Cell.

23 To prepare to transfer a loaded Facility Canister from the Hot Cell to the Transfer Cell, a  
24 Shielded Insert is placed onto a Cask Transfer Car in the RH Bay. The Cask Transfer Car is  
25 then moved into the Cask Unloading Room and positioned under the Cask Unloading Room  
26 Bridge Crane. The Bridge Crane attaches to the Shielded Insert. The Cask Unloading Room  
27 Bridge Crane lifts and suspends the Shielded Insert clear of the Cask Transfer Car. The  
28 Shielded Insert is aligned over the Cask Unloading Room port. The floor valve is opened, and  
29 the Shielded Insert is lowered into the Transfer Cell Shuttle Car. The Cask Unloading Room  
30 Bridge Crane is unhooked and retracted, and the Cask Unloading Room shield valve is closed.  
31 The Shielded Insert is positioned under the Hot Cell port.

32 The Hot Cell Bridge Crane lifts a loaded, closed Facility Canister and positions it over the Hot  
33 Cell port. The Hot Cell shield valve is opened, and the crane lowers the Facility Canister through  
34 the port into the Shielded Insert positioned in the Transfer Cell Shuttle Car in the Transfer Cell.  
35 The Hot Cell Bridge Crane is disconnected from the Facility Canister and raised until the crane  
36 hook clears the Hot Cell shield valve. The Hot Cell shield valve is then closed.

#### 37 Transfer of Disposal Canister into the Facility Cask

38 The transfer of a canister into the Facility Cask from the Transfer Cell is monitored by closed-  
39 circuit television cameras. The Transfer Cell Shuttle Car positions the RH-TRU 72-B cask or  
40 Shielded Insert under the Facility Cask Loading Room port and the shield valve is opened. Then  
41 the remotely operated 6.25 Ton Grapple Hoist attaches to the canister, and the canister is lifted  
42 through the open shield valve into the vertically-oriented Facility Cask located on the Facility  
43 Cask Transfer Car in the Facility Cask Loading Room. During this cask-to-cask transfer, the

1 telescoping port shield is in contact with the underside of the Facility Cask to assure shielding  
2 continuity, as does the shield bell located above the Facility Cask.

3 For canisters received at the WIPP facility from the generator site in a RH-TRU 72-B cask, the  
4 identification number is verified using cameras, which also provide images of the canister  
5 surfaces during the lifting operation. Identification numbers are verified ~~against the WWIS in~~  
6 accordance with Permit Attachment C, Section C-5b(1). If there are any discrepancies, the  
7 canister is returned to the RH-TRU 72-B cask, returned to the Parking Area Unit PAU, and the  
8 generator is contacted for resolution. Discrepancies that are not resolved within 15 days will be  
9 reported to the NMED as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.72). As the  
10 canister is being lifted from the RH-TRU 72-B cask into the Facility Cask, additional swipe  
11 samples may be taken.

#### 12 Transfer of the Canister to the Underground

13 When the canister is fully within the Facility Cask, the lower shield valve is closed. The 6.25 Ton  
14 Grapple Hoist detaches from the canister and is raised until the 6.25 Ton Grapple Hoist clears  
15 the Facility Cask, at which time the upper shield valve is closed. The 6.25 Ton Grapple Hoist  
16 and shield bell are then raised clear of the Facility Cask, and the telescoping port shield is  
17 retracted. The Facility Cask Rotating Device rotates the Facility Cask until it is in the horizontal  
18 position on the Facility Cask Transfer Car. The shield doors on the Facility Cask Loading Room  
19 are opened, and the ~~facility-Facility~~ Cask Transfer Car moves onto the ~~waste-Waste shaft-Shaft~~  
20 conveyance-Conveyance and is lowered to the ~~waste-Waste~~ Shaft Station underground. At the  
21 ~~waste-Waste~~ Shaft Station underground, the Facility Cask Transfer Car moves the Facility Cask  
22 from the ~~waste-Waste shaft-Shaft conveyance-Conveyance~~. A forklift is used to remove the  
23 Facility Cask from the Facility Cask Transfer Car and to transport the Facility Cask to the  
24 Underground HWDU.

#### 25 Returning the Empty Cask

26 The empty RH-TRU 72-B cask or Shielded Insert is returned to the RH Bay by reversing the  
27 process. In the RH Bay, swipe samples are collected from inside the empty cask. If necessary,  
28 the inside of the cask is decontaminated. The RH-TRU 72-B cask lids are replaced, and the  
29 cask is replaced on the trailer using the RH Bay Bridge Crane. The impact limiters are replaced,  
30 and the trailer and the RH-TRU 72-B cask are then moved out of the RH Bay. The Shielded  
31 Insert is stored in the RH Bay until needed.

#### 32 A1-1d(4) Handling Waste in Shielded Containers

33 Remote-~~Handled-handled~~ TRU mixed waste received at the WIPP facility in shielded containers  
34 ~~will be are~~ managed, stored, and emplaced as CH TRU mixed waste using the CH TRU mixed  
35 waste handling equipment described in this Permit. Shielded containers with RH TRU mixed  
36 waste will arrive by tractor-trailer at the WIPP facility in sealed HalfPACTs. Prior to unloading  
37 the packages from the trailer, they will undergo security and radiological checks and shipping  
38 documentation reviews. Consistent with the handling of HalfPACT shipping packages in Section  
39 A1-1d(2), a forklift will remove the HalfPACT and transport it into the WHB and place the  
40 HalfPACT at either one of the two TRUDOCKs in the TRUDOCK Storage Area of the WHB Unit.  
41

42 An external survey of the HalfPACT ICV ~~lid will be is~~ performed as the OCV lid is removed. The  
43 ICV lid ~~or closure lid will be is~~ lifted under the VHS, and the contents ~~will be are~~ surveyed during

1 and after this process is complete. A description of the VHS and criteria that are applied if  
2 radiological contamination is detected are discussed in Section A1-1d(2).

3  
4 Shielded containers will beare received as three-pack assemblies in HalfPACTs. An overhead  
5 bridge crane will bejs used to remove the ~~contents of the~~ shielded container assembly and place  
6 them on a facility pallet. The containers will beare visually inspected for physical damage  
7 ~~(severe rusting, apparent structural defects, signs of pressurization, etc.)~~ and leakage to ensure  
8 they are in good condition prior to storage. Waste containers will are also ~~be~~ checked for  
9 external radiological surface contamination through the use of swipes and radiation monitoring  
10 equipment, consistent with radiological control procedures pursuant to 10 CFR Part 835. If a  
11 primary waste container is not in good condition, the Permittees will either overpack the  
12 container with another approved container, repair/patch the container in accordance with 49  
13 CFR §173 and §178 (e.g., 49 CFR §173.28) appropriate standards and guidance (e.g., 40 CFR  
14 §173.28), or return the container to the generator, or send the HalfPACT to a third-party  
15 contractor. If local decontamination activities are opted for, the work will be conducted in the  
16 WHB Unit, consistent with radiological control procedures.

17  
18 Once the shielded container assembly is on the facility pallet, the TRU mixed waste container  
19 identification numbers will beare verified ~~against the Uniform Hazardous Waste Manifest and~~  
20 ~~the WWIS~~ in accordance with Permit Attachment C, Section C-5b(1). Inconsistencies will be  
21 resolved as discussed in Section A1-1d(2) of this Permit Attachment. Up to two three-pack  
22 assemblies of shielded containers will beare placed on a facility pallet. The use of facility pallets  
23 will elevates the waste at least 6 in. (15 cm) from the floor surface. Pallets of waste will are then  
24 be relocated to maintained in the CH Bay Storage Area of the WHB Unit for normal storage or  
25 will beare transported to the conveyance loading room as described in Section A1-1d(2).

#### 26 27 A1-1e Inspections

28 Inspection of containers and container storage area are required by 20.4.1.500 NMAC  
29 (incorporating 40 CFR §264.174). These inspections are described in this section.

#### 30 A1-1e(1) WHB Unit

31 The waste containers in storage will beare inspected visually or by closed-circuit television  
32 camera prior to each movement and, at a minimum, weekly, to ensure that the waste containers  
33 are in good condition and that there are no signs that a release has occurred. ~~Waste containers~~  
34 ~~will be visually inspected for physical damage (severe rusting, apparent structural defects, signs~~  
35 ~~of pressurization, etc.) and leakage. If a primary waste container is not in good condition, the~~  
36 ~~Permittees will overpack the container, repair/patch the container in accordance with 49 CFR~~  
37 ~~§173 and §178 (e.g., 49 CFR §173.28), or return the container to the generator.~~ This visual  
38 inspection of CH TRU mixed waste containers shall not include the center drums of 7seven-  
39 packs and waste containers positioned such that visual observation is precluded due to the  
40 arrangement of waste assemblies on the facility pallets. If waste handling operations should  
41 stop for any reason with containers located at the TRUDOCK while still in the ~~Contact-Handled~~  
42 ~~Package~~ CH package, primary waste container inspections will not be accomplished until waste  
43 handling operations are resumed and the containers of waste are removed from the ~~Contact-~~  
44 ~~Handled Package~~ CH package. If the lid to the ~~Contact-Handled Package~~ CH package ICV is  
45 removed, radiological checks (swipes of ~~Contact-Handled Package~~ CH package inner surfaces)  
46 will beare used to determine if there is contamination within the ~~Contact-Handled Package~~ CH  
47 package. Such contamination could indicate a possible waste container leak or spill. Using

1 radiological surveys, a detected spill or leak of a radioactive contamination from a waste  
2 container will also be assumed to be a hazardous waste spill or release.

3 ~~Waste containers residing within a Contact Handled Package are not inspected, as described in~~  
4 ~~the first bullet in Section A1-1e(2).~~

5 ~~Waste containers will be inspected prior to reentering the waste management process line for~~  
6 ~~downloading to the underground. Waste containers stored in this area will be inspected at least~~  
7 ~~once weekly.~~

8 Loaded RH-TRU 72-B and CNS 10-160B casks will be inspected when present in the RH  
9 Bay. Physical or closed-circuit television camera inspections of the RH Complex are conducted  
10 as described in Table DE-1a. Canisters loaded in an RH-TRU 72-B cask are inspected in the  
11 Transfer Cell during transfer from the cask to the Facility Cask. Waste containers received in  
12 CNS 10-160B casks are inspected in the Hot Cell during transfer from the cask to the Facility  
13 Canister by camera and/or visual inspection (through shield windows).

#### 14 A1-1e(2) Parking Area Unit

15 Inspections will be conducted in the Parking Area UnitPAU at a frequency not less than once  
16 weekly when waste is present. These inspections are applicable to loaded, stored ~~Contact-~~  
17 ~~Handled and Remote-Handled PackagesCH and RH packages~~. The perimeter fence located at  
18 the lateral limit of the Parking Area UnitPAU, coupled with personnel access restrictions into the  
19 WHB, will provide the needed security. The perimeter fence and the southern border of the  
20 WHB shall mark the lateral limit of the Parking Area UnitPAU (Figure M-2A1-2). Inspections of  
21 the ~~Contact-Handled or Remote-Handled PackagesCH or RH packages~~ stored in the Parking  
22 Area UnitPAU will focus on the inventory and integrity of the shipping containers and the  
23 spacing between ~~Contact-Handled and Remote-Handled PackagesCH or RH packages~~. This  
24 spacing will be maintained at a minimum of four feet.

25 ~~Contact-Handled and Remote-Handled Packages located in the Parking Area Unit will be~~  
26 ~~inspected weekly during use and prior to each reuse.~~

27 Inspection of waste containers is not possible when the containers are in their shipping  
28 container ~~(e.g., casks, TRUPACT-II or HalfPACTs)~~. Inspections can be accomplished by  
29 bringing the shipping containers into the WHB Unit and opening them and lifting-removing the  
30 waste containers out for inspection. The DOE, however, believes that removing containers  
31 strictly for the purposes of inspection results in unnecessary worker exposures and subjects the  
32 waste to additional handling. The DOE has proposed that waste containers need not be  
33 inspected at all until they are ready to be removed from the shipping container for emplacement  
34 underground. Because shipping containers are sealed and are of robust design, no harm can  
35 come to the waste while in the shipping containers and the waste cannot leak or otherwise be  
36 released to the environment. ~~Contact-Handled or Remote-Handled Packages shall be opened~~  
37 ~~every 60 days for the purposes of venting, so that t~~The longest amount of time waste containers  
38 would be uninspected would be for 60-59 days ~~from the date that the ICV of the Contact-~~  
39 ~~Handled or Remote-Handled Package was closed at the generator site after the ICV Closure~~  
40 ~~Date, as recorded in the WWIS. Venting the Contact-Handled or Remote-Handled Packages~~  
41 ~~involves removing the outer lid and installing a tool in the port of the inner lid.~~

1 The following strategy will be used for inspecting waste containers that will be retained within  
2 their shipping containers for an extended period of time; this will minimize the amount of  
3 shipping and waste handling, while maintaining a reasonable inspection schedule:

- 4 • If the reason for retaining the TRU mixed waste containers in the shipping container is  
5 due to an unresolved manifest discrepancy, the DOE will return the shipment to the  
6 generator prior to the expiration of the 60-day NRC venting period or within 30 days  
7 after receipt at the WIPP facility, whichever comes sooner. In this case, no inspections  
8 of the internal containers will be performed. The stored ~~Contact-Handled or Remote-~~  
9 ~~Handled Package~~ CH or RH package will be inspected weekly as described above.
  
- 10 • If the reason for retaining the TRU mixed waste containers in the ~~Contact-Handled or~~  
11 ~~Remote-Handled Package~~ CH or RH package is due to an equipment malfunction that  
12 prevents unloading the waste in the WHB Unit, the DOE will return the shipment to the  
13 generator prior to the expiration of the 60-day NRC venting period. In this case, the  
14 DOE would have to ship the TRU mixed waste containers back with sufficient time for  
15 the generator to vent the shipment within the 60-day ~~limit~~ NRC venting period. In this  
16 case, no inspections of the internal containers will be performed. The stored ~~Contact-~~  
17 ~~Handled or Remote-Handled Package~~ CH or RH package will be inspected weekly as  
18 described above.
  
- 19 • If the reason for retaining the TRU mixed waste containers is due to an equipment  
20 malfunction that prevents the timely movement of the waste containers into the  
21 underground, the waste containers will may be kept in the ~~Contact-Handled or~~  
22 ~~Remote-Handled Package~~ CH or RH package no longer than day 59 until day 30 (after  
23 receipt at the WIPP) or the expiration of the 60-day limit NRC venting period,  
24 whichever comes sooner. At that time the ~~Contact-Handled or Remote-Handled~~  
25 ~~Package~~ CH or RH package will be moved into the WHB Unit. ~~Contact-Handled~~  
26 ~~handled~~ TRU mixed waste containers will be removed and placed in one of the  
27 permitted storage areas in the WHB Unit from their shipping package; if the maximum  
28 capacity of the CH Bay Storage Area has been reached, the Permittees may  
29 implement CH Bay Surge Storage in accordance with the notification requirements of  
30 Permit Part 3, Section 3.1.1.3. The ~~Remote-Handled Package~~ RH package will be  
31 vented, however, the containers will not be removed from the shipping package. If  
32 there is no additional space within the permitted storage areas of the WHB Unit, the  
33 ~~DOE-Permittees~~ will discuss an emergency permit with the NMED for the purposes of  
34 storing the waste ~~elsewhere in the WHB Unit~~. Waste containers will be inspected when  
35 removed from the ~~Contact-Handled Packaging~~ CH packaging and weekly while in  
36 storage in the WHB Unit. ~~Contact-Handled or Remote-Handled Packages~~ The CH or  
37 RH packages will be inspected weekly while they contain TRU mixed waste containers  
38 as discussed above.

39 ~~The DOE believes that this strategy minimizes both the amount of shipping that is necessary~~  
40 ~~and the amount of waste handling, while maintaining a reasonable inspection schedule. The~~  
41 ~~DOE will stop shipments of waste for any equipment outage that will extend beyond three days.~~



1 A1-1f Containment

2 The WHB Unit has concrete floors, which are sealed with a coating that is designed to resist all  
3 but the strongest oxidizing agents. Such oxidizing agents do not meet the TSDF-WAC and ~~will~~  
4 are not ~~be~~ accepted in TRU mixed waste at the WIPP facility. Therefore, TRU mixed wastes  
5 pose no compatibility problems with respect to the WHB Unit floor. ~~The floor coating consists of~~  
6 ~~Carboline® 1340 clear primer sealer on top of prepared concrete, Carboline® 191 primer epoxy,~~  
7 ~~and Carboline® 195 surface epoxy. The manufacturer's chemical resistance guide shows "Very~~  
8 ~~Good" for acids and "Excellent" for alkalis, solvents, salt, and water. Uses are indicated for~~  
9 ~~nuclear power plants, industrial equipment and components, chemical processing plants, and~~  
10 ~~pulp and paper mills for protection of structural steel and concrete. During the Disposal Phase,~~  
11 ~~should the floors need to be re-coated, any floor coating used in the WHB Unit TRU mixed~~  
12 ~~waste handling areas will be compatible with the TRU mixed waste constituents and will have~~  
13 ~~chemical resistance at least equivalent to the Carboline® products. Figure A1-1 shows where~~  
14 ~~TRU mixed waste handling activities discussed in this section occur.~~

15 During normal operations, ~~the floor of~~ the storage areas within the WHB Unit ~~shall be~~are visually  
16 inspected on a weekly basis to verify that ~~it the concrete floor~~ is in good condition and free of  
17 obvious cracks and gaps. Floor areas of the WHB Unit in use during off-normal events ~~will~~  
18 be inspected prior to use and weekly thereafter. ~~All TRU Transuranic~~ mixed waste containers  
19 located in the permitted storage areas ~~shall be~~are elevated at least 6 in. (15 cm) from the  
20 surface of the floor. TRU mixed waste containers that have been removed from ~~Contact-~~  
21 ~~Handled or Remote-Handled Packaging CH or RH packages~~ shall be stored ~~at a designated~~  
22 storage area inside the WHB Unit so as to preclude exposure to the elements.

23 Secondary containment at the CH Bay Storage Area inside the WHB Unit ~~shall be~~is provided by  
24 the WHB Unit concrete floor (See Figure M-1A1-4). The WHB Unit is engineered such that  
25 during normal operations, the floor capacity is sufficient to contain liquids upon release.  
26 Secondary Containment at the Derived Waste Storage Area of the WHB Unit ~~will be~~is provided  
27 by a polyethylene standard drum containment pallet. The Parking Area Unit PAU and TRU DOCK  
28 Storage Area of the WHB Unit require no engineered secondary containment since no waste is  
29 to be stored there unless it is protected by the ~~Contact-Handled or Remote-Handled~~  
30 Packaging CH or RH packaging.

31 Calculations to determine the floor surface area required to provide secondary containment in  
32 the event of a release are based on the maximum quantity of liquid which could be present  
33 within ten percent of one percent of the volume of ~~all~~ the containers or one percent of the  
34 capacity of the largest single container, whichever is greater.

35 Secondary containment at storage locations inside the RH Bay and Cask Unloading Room is  
36 provided by the cask. Secondary containment at storage locations inside the Transfer Cell is  
37 provided by the RH-TRU 72-B cask or Shielded Insert. Secondary containment at storage  
38 locations in the Facility Cask Loading Room is provided by the Facility Cask. In the Hot Cell,  
39 waste containers are stored in either the drum carriage unit or in ~~canister sleeves~~Facility  
40 Canisters. The Lower Hot Cell provides secondary containment as described in section A1-f(2).  
41 In addition, the RH Bay, Hot Cell, and Transfer Cell contain ~~220-gallon-gal~~ (833-L) (Hot Cell),  
42 ~~11,400-gallon-gal~~ (43,152-L) (RH Bay), and ~~220-gallon-gal~~ (833-L) (Transfer Cell) sumps,  
43 respectively, to collect any liquids.

1 A1-1f(1) Secondary Containment Requirements for the WHB Unit

2 The maximum TRU mixed waste volume on facility pallets that ~~will~~ could be stored in the CH  
3 Bay Storage and Surge Storage Areas of the WHB is 18 facility pallets @ 2 TDOPs per pallet =  
4 36 TDOPs of waste. 36 TDOPs @ 1,200 gal (4,540 L) per TDOP = 43,200 gal (163,440 L)  
5 waste container capacity. 43,200 gal (163,440 L) x ten percent of the total volume = 4,320 gal  
6 (16,344 L) of waste. Since 4,320 gal (16,344 L) is greater than 1,200 gal (4,540 L), the  
7 configuration of possible TDOPs in the storage area is used for the calculation of secondary  
8 containment requirements. 4,320 gal (16,344 L) of liquid x one percent liquids = 43.2 gal (163.4  
9 L) of liquid for which secondary containment is needed.

10 The maximum TRU mixed waste volume that ~~will~~ could be stored in the Derived Waste Storage  
11 Area of the WHB Unit is one SWB. 1 SWBs @ 496 gal (1,878 L) per SWB = 496 gal (1,878 L)  
12 waste container capacity. Since the maximum storage volume of 496 gal (1,878 L) is equal to  
13 the volume of the largest single container, the volume of ~~the~~ a single SWB is used for the  
14 calculation of secondary containment requirements. 496 gal (1,878 L) of liquid x one percent  
15 liquids = 4.96 gal (18.8 L) of liquid for which secondary containment is needed.

16 The maximum TRU mixed waste volume that ~~will~~ could be stored in the Hot Cell is 13 RH TRU  
17 drums @ 55 gal (210 L) per drum = 715 gal (2,730 L) of waste in drums. 715 gal (2,730 L) of  
18 waste x ten percent of total volume = 71.5 gal (273 L) of waste. Secondary containment for  
19 liquids will need to have a capacity of 71.5 gal (273 L). Since 71.5 gal (273 L) is less than the  
20 volume of the single container of 235 gal (890 L) therefore, the larger volume is used for  
21 determining the secondary containment requirements. 235 gal (890 L) of waste x one percent  
22 liquids = 2.35 gal (8.9 L) of liquid needed for secondary containment.

23 The maximum TRU mixed waste volume that ~~will~~ could be stored in the Transfer Cell is one RH-  
24 TRU 72-B Canister or one Facility Canister @ 235 gal (890 L) per canister x ten percent of total  
25 volume = 23.5 gal (8.90 L) of waste. Since 23.5 gal (8.90 L) is less than the volume of the single  
26 container of 235 gal (890 L) therefore, the larger volume is used for determining the secondary  
27 containment requirements. 235 gal (890 L) of waste x one percent liquids = 2.35 gal (8.9 L) of  
28 liquid needed for secondary containment.

29 A1-1f(2) Secondary Containment Description

30 The following is a calculation of the surface area the quantities of liquid would cover. Using a  
31 conversion factor of 0.1337 ft<sup>3</sup>/gal (0.001 m<sup>3</sup>/L) and assuming the spill is 0.0033 ft (0.001 m)  
32 thick, the following calculation can be used:

33 gallons × cubic feet per gallon ÷ thickness in feet = area covered in square feet

34 CH Bay Storage Area

35 43.2 gal × 0.1337 ft<sup>3</sup>/gal ÷ 0.0033 ft = 1,750 ft<sup>2</sup> (162.7 m<sup>2</sup>)

36 Hot Cell

37 2.35 gal × 0.1337 ft<sup>3</sup>/gal ÷ 0.0033 ft = 95 ft<sup>2</sup> ( 8.8 m<sup>2</sup>)

38 Transfer Cell

1  $2.35 \text{ gal} \times 0.1337 \text{ ft}^3/\text{gal} \div 0.0033 \text{ ft} = 95 \text{ ft}^2 (8.8 \text{ m}^2)$

2 The WHB Unit has 33,175 ft<sup>2</sup> (3,082 m<sup>2</sup>) of floor space, the CH Bay Storage Area has 26,151 ft<sup>2</sup>  
3 ~~(2,430 m<sup>2</sup>)~~ of floor space. The CH Bay Storage Area requires 1,750 ft<sup>2</sup> (162.7 m<sup>2</sup>) for  
4 containment, Thus, the floor area of the CH Bay Storage Area of the WHB Unit provide  
5 sufficient secondary containment to contain a release of ten percent of one percent of the  
6 volume of ~~all of~~ the containers, or one percent of the capacity of the largest container, whichever  
7 is greater.

8 The Hot Cell and Transfer Cell are the only portions of the RH Complex managing RH TRU  
9 mixed waste outside of casks or canisters. The Hot Cell has 1,841 ft<sup>2</sup> (171 m<sup>2</sup>) of floor space  
10 and the Transfer Cell has 1,003 ft<sup>2</sup> (93 m<sup>2</sup>) of floor space. The Hot Cell and Transfer Cell require  
11 only 95 ft<sup>2</sup> for containment, therefore there is sufficient floor space to contain a release of ten  
12 percent of one percent of containers in these storage areas.

13 In addition, both the Hot Cell and the Transfer Cell each contain a 220 gal (833 L) sump that will  
14 collect ~~any~~ liquids that spill from containers.

#### 15 Derived Waste Storage Area

16 The derived waste containers in the Derived Waste Storage Area ~~will be~~ stored on ~~standard~~  
17 ~~drum containment~~ pallets, which provides approximately 50 gal (190 L) of secondary  
18 containment capacity. Thus, the secondary containment capacity of the ~~standard~~  
19 ~~drum containment~~ pallet is sufficient to contain a release of ten percent of one percent of the  
20 largest container (4.96 gal or 18.8 L).

#### 21 Parking Area Unit

22 Containers of TRU mixed waste to be stored in the ~~Parking Area Unit~~ PAU ~~will be~~ in ~~Contact-~~  
23 ~~Handled or Remote Handled Packages~~ CH or RH packages. There ~~will be~~ no additional  
24 requirements for engineered secondary containment systems.

#### 25 A1-1g Special Requirements for Ignitable, Reactive, and Incompatible Waste

26 Special requirements for ignitable, reactive, and incompatible waste are addressed in  
27 20.4.1.500 NMAC (incorporating 40 CFR §§264.176 and 264.177). Permit Part 2 precludes  
28 ignitable, reactive, or incompatible waste at the WIPP facility. No additional measures are  
29 required.

#### 30 A1-1h Closure

31 Clean closure is planned in accordance with 20.4.1.500 NMAC (incorporating 40 CFR  
32 §264.178) for ~~all~~ permitted container storage areas. The applicable areas and the plans for  
33 clean closure are detailed in Permit Attachment G.

#### 34 A1-1i Control of Run On

35 The WHB Unit is located indoors which prevents run-on from a precipitation event. In addition,  
36 the CH TRU containers are stored on facility pallets, ~~or~~ containment pallets, ~~or standard drum~~  
37 ~~pallets~~, which elevate the CH TRU mixed waste containers at least 6 in. (15 cm) off the floor, or



1 in ~~Contact-Handled or Remote-Handled Packages~~CH or RH packages, so that any firewater  
2 released in the building will not pool around containers. Within the RH Bay, Cask Unloading  
3 Room, Transfer Cell, and Facility Cask Loading Room, waste containers are stored in casks or  
4 Shielded Inserts and protected from any potential run on. Any firewater released in the building  
5 will not pool around the waste containers as they are stored in casks, or Shielded Inserts. Within  
6 the Hot Cell, there is no source of water during operations. However, control of run-on is  
7 provided by the Lower Hot Cell, which lies below a sloped floor surrounded by a grating and  
8 ~~canister sleeves~~Facility Canisters in the Hot Cell above.

9 In the ~~Parking Area Unit~~PAU, the containers of TRU mixed waste are always in ~~Contact-~~  
10 ~~Handled or Remote-Handled Packages~~CH or RH packages which protect them from  
11 precipitation and run on. Therefore, the WIPP facility container storage units will comply with the  
12 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.175(b)(4)).

13

1 References

2 DOE, 1997a. Resource Conservation and Recovery Act Part B Permit Application, Waste  
3 Isolation Pilot Plant (WIPP), Carlsbad, New Mexico, Rev. 6.5, 1997.

4 ~~DOE, 1997b. Waste Isolation Pilot Plant Safety Analysis Report (DOE/WIPP-95-2065, Rev. 1),~~  
5 ~~U.S. Department of Energy, Carlsbad Area Office, Carlsbad, NM, April 1997.~~

6 DOE, 2009. WIPP Hazardous Waste Facility Permit Amended Renewal Application, Carlsbad,  
7 New Mexico, September 2009.

8 EPA, 2015. SW-846. Test Methods for Evaluating Solid Waste. Physical/Chemical Methods.  
9 Office of Solid Waste and Emergency Response, Washington, D.C.

10

## TABLES

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2

**Table A1-1  
 Basic Design Requirements, Principal Codes, and Standards**

	Structure/Supports			Liquid and Process Air Handling Processing and storage equipment						Air Hdlg Ducting & Fans	HVAC filters			Mechanical Handling Equipment			Instrumentation and Electrical			Quality Assurance Program	
	DBE DBT ACI-318 AISC	ANSI A58.1	Site-specific Requirements	Vessel ASME VIII NFPA <sup>e</sup>	Piping & Valves		Pumps API-610 NFPA <sup>e</sup>	Storage Tanks API-650 or API-620	Heat Exchgrs ASME VIII TEMA	All-Other Equipment Mfrs-Std	ARI SMACNA AMCA	Pre-filters ASHRAE 52.68	HEPA Filters MIL-F 51068C ANSI-N 509 ANSI-N 510	Crane and Related equipment CMAA	AISC AWS	All Other Equipment Mfrs STD	A-NE	ANSI Sods or Nat'l Electrical Code	IA/ Mfrs Std	ANSI/ASME NQA-1 and Supplements	Com. and Industry Practices
Design Class-I	X		a	X <sup>f</sup>			X	X	X		X <sup>c</sup>	X <sup>c,d</sup>	X <sup>c</sup>	X	X		X	X		X	
Design Class-II	a,b	X	a	X	X		X	X	X		X <sup>c</sup>	X <sup>c</sup>	X <sup>c</sup>	X	X		X	X		X	
Design Class-IIIa	a	X	a	a	X		a		X		X <sup>e</sup>	X <sup>e</sup>	X <sup>e</sup>	a	a	X		X	X		X
Design Class-III		X	g		a	X			X		X	X	X			X		X	X		X

X – Minimum Requirements

<sup>a</sup> – Requirements to be determined on a case-by-case basis.

<sup>b</sup> – Required for structure and supports needed for confinement and control of radioactivity.

<sup>c</sup> – Except structures and supports that are designed to withstand a design-basis earthquake (DBE)/design-basis tornado (DBT) when specified in column 1 of this table.

<sup>d</sup> – Underwriter's Laboratory (UL) Class I Listed.

<sup>e</sup> – For fire protection systems.

<sup>f</sup> – American Society for Mechanical Engineers (ASME) III for other Class I vessels.

<sup>g</sup> – Design of underground structures, mining equipment, and facilities are basically governed by the MSHA and experience in local mines.

3

ACI – American Concrete Institute

AISC – American Institute of Steel Construction

AMCA – Air Moving and Conditioning Association

ANSI – American National Standards Institute

API – American Petroleum Institute

ARI – Air Conditioning and Refrigeration Institute

ASHRAE – American Society of Heating, Refrigeration, and Air Conditioning Engineers, Inc.

AWS – American Welding Society

CMAA – Crane Manufacturers Association

DBE – Design-basis earthquake

DBT – Design-basis tornado

HEPA – High-efficiency particulate air

HVAC – Heating, Ventilation, and Air Conditioning

A – Institute of Electronics and Electronic Engineers

IA – Instrument Society of America

MFR – Manufacturer

MIL – Military (specification)

MSHA – Mine Safety and Health Administration

NFPA – National Fire Protection Association

NQA – Nuclear Quality Assurance (Standard)

SMACNA – Sheet Metal and Air Conditioning Contractors National Association, Inc.

STD – Standard

TEMA – Tubular Exchanger Manufacturers Association

UP – Uniform Plumbing Code

1  
2

**Table A1-1**  
**TRU Mixed Waste Containers<sup>a</sup>**

<b>DESCRIPTION</b>	<b>VOLUME</b>		<b>DIMENSIONS (inches)</b>			<b>LINER</b>	<b>USE FOR DERIVED WASTE</b>	<b>FIGURE</b>
	<b>CUBIC FEET</b>	<b>CUBIC METERS</b>	<b>LENGTH</b>	<b>WIDTH OR DIAMETER</b>	<b>HEIGHT</b>			
<u>55-gal (208-L) drum</u>	<u>7.4</u>	<u>0.21</u>	<u>N/A</u>	<u>24</u>	<u>35</u>	<u>Optional</u>	<u>Yes</u>	<u>M-3</u>
<u>Standard waste box</u>	<u>66.3</u>	<u>1.88</u>	<u>71</u>	<u>54</u>	<u>36</u>	<u>No</u>	<u>Yes</u>	<u>M-4</u>
<u>Ten-drum overpack</u>	<u>160</u>	<u>4.5</u>	<u>N/A</u>	<u>72</u>	<u>73</u>	<u>No</u>	<u>Yes, in under-ground</u>	<u>M-5</u>
<u>85-gal (322-L) drum</u>	<u>11.4</u>	<u>0.32</u>	<u>N/A</u>	<u>26</u>	<u>36</u>	<u>Optional</u>	<u>Yes</u>	<u>M-6</u>
<u>100-gal (379-L) drum</u>	<u>13.4</u>	<u>0.38</u>	<u>N/A</u>	<u>32</u>	<u>35</u>	<u>Optional</u>	<u>No</u>	<u>M-7</u>
<u>Standard large box 2</u>	<u>261</u>	<u>7.39</u>	<u>108</u>	<u>69</u>	<u>73</u>	<u>No</u>	<u>No</u>	<u>M-8</u>
<u>Facility canister</u>	<u>31.4</u>	<u>0.89</u>	<u>N/A</u>	<u>28</u>	<u>117</u>	<u>No</u>	<u>No</u>	<u>M-9</u>
<u>RH TRU canister</u>	<u>31.4</u>	<u>0.89</u>	<u>N/A</u>	<u>26</u>	<u>120</u>	<u>Insert optional</u>	<u>No</u>	<u>M-10</u>
<u>Shielded container</u>	<u>7.4</u>	<u>0.21</u>	<u>N/A</u>	<u>23</u>	<u>36</u>	<u>1 inch of lead shielding</u>	<u>No</u>	<u>M-11</u>

N/A Not applicable to drums

<sup>a</sup> TRU mixed waste containers may also be used to overpack waste containers that, upon removal from the shipping package, have been determined to be leaking or not in good condition.

1  
2

**Table A1-2**  
**CH TRU Mixed Waste Handling Equipment Capacities**

<b>CAPACITIES FOR EQUIPMENT (lb)</b>	
CH Bay overhead bridge crane	12,000 <del>lbs.</del>
Surface forklifts	26,000 <del>lbs.</del> (CH Bay forklift) 70,000 <del>lbs.</del> (TRUPACT-III Handler forklift)
Facility Pallet	25,000 <del>lbs.</del>
<del>Adjustable center of gravity lift fixture</del> <u>Lift Fixture</u>	10,000 <del>lbs.</del>
Facility Transfer Vehicle	30,000 <del>lbs.</del>
Yard Transfer Vehicle	60,000 <del>lbs.</del>
<b>MAXIMUM GROSS WEIGHTS OF CONTAINERS (lb)</b>	
Seven-pack of 55-gallon-gal (208-L) drums	7,000 <del>lbs.</del>
Four-pack of 85-gallon-gal (322-L) drums	<del>4,500</del> 4,000 <del>lbs.</del>
Three-pack of 100-gallon-gal (379-L) drums	3,000 <del>lbs.</del>
Ten-drum overpack	6,700 <del>lbs.</del>
Standard waste box	4,000 <del>lbs.</del>
Standard large box 2	10,500 <del>lbs.</del>
Shielded container	2,260 <del>lbs.</del>
Three-pack of shielded containers	7,000 <del>lbs.</del>
<b>MAXIMUM NET EMPTY WEIGHTS OF EQUIPMENT (lb)</b>	
TRUPACT-II	13,140 <del>lbs.</del>
HalfPACT	10,500 <del>lbs.</del>
TRUPACT-III	43,600 <del>lbs.</del>
<del>Adjustable center of gravity lift fixture</del> <u>Lift Fixture</u>	2,500 <del>lbs.</del>
Facility pallet	4,120 <del>lbs.</del>

3

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2

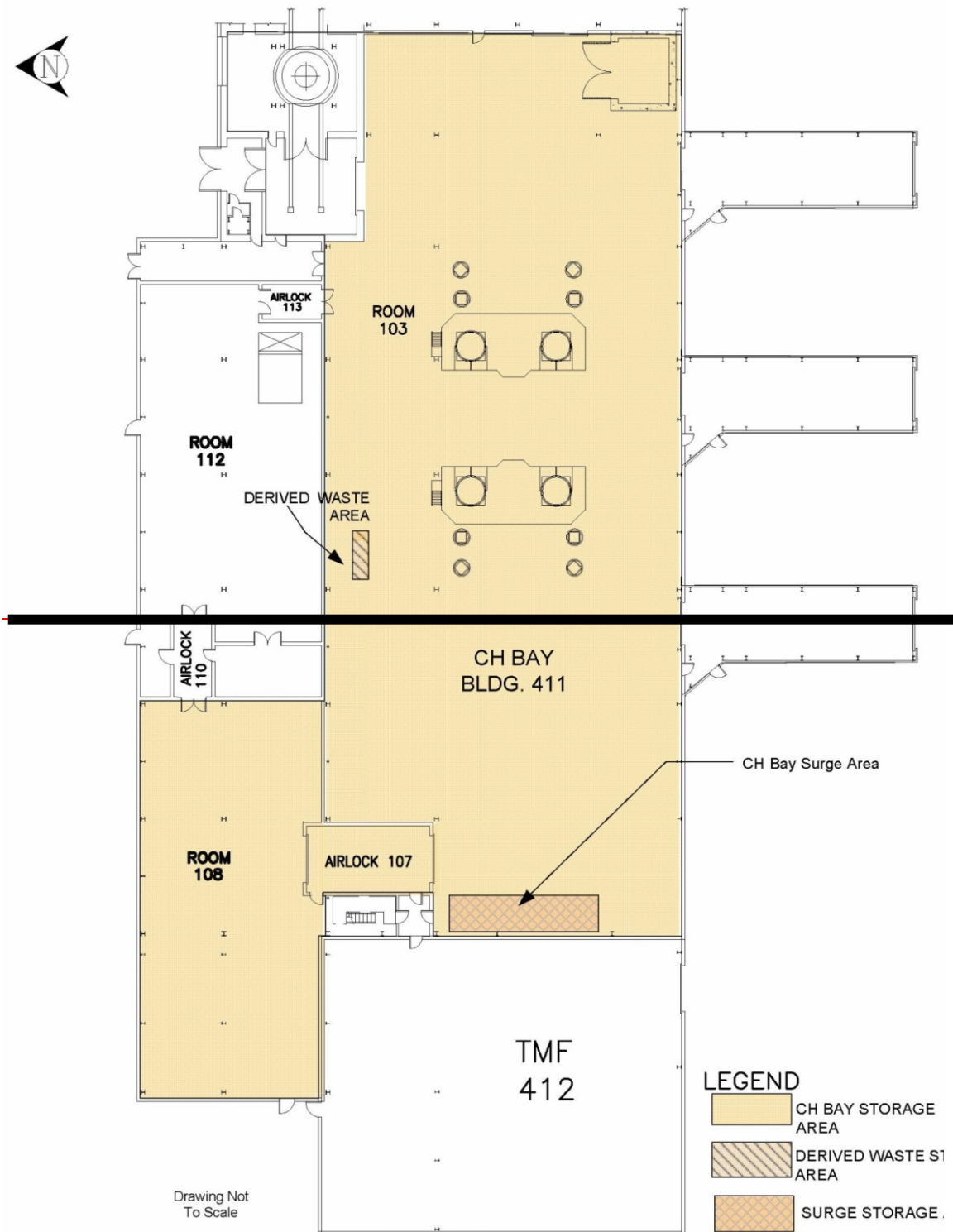
**Table A1-3  
 RH TRU Mixed Waste Handling Equipment Capacities**

<b>CAPACITIES FOR EQUIPMENT (tons)</b>	
RH Bay Overhead Bridge Crane	140- <del>tons</del> main hoist 25- <del>tons</del> auxiliary hoist
RH-TRU 72-B Cask Transfer Car	20- <del>tons</del>
CNS 10-160B Cask Transfer Car	35- <del>tons</del>
Transfer Cell Shuttle Car	29- <del>tons</del>
Hot Cell Bridge Crane	15- <del>tons</del>
Overhead Powered Manipulator	2.5- <del>tons</del>
Facility Cask Rotating Device	No specific load rating
Cask Unloading Room Crane	25- <del>tons</del>
6.25 Ton Grapple Hoist	6.25- <del>tons</del>
Facility Cask Transfer Car	40- <del>tons</del>
<b>MAXIMUM GROSS WEIGHTS OF RH TRU CONTAINERS (lb)</b>	
RH TRU Canister	8,000- <del>lbs</del>
55- <del>Gallon-gal (208-L)</del> Drum	1,000- <del>lbs</del>
Facility Canister	10,000- <del>lbs</del>
<b>MAXIMUM NET EMPTY WEIGHTS OF EQUIPMENT (lb)</b>	
RH-TRU 72-B Cask	37,000- <del>lbs</del>
CNS 10-160B Cask	57,500- <del>lbs</del>
Facility Cask	67,700- <del>lbs</del>
<u>Light Weight Facility Cask</u>	<u>48,450</u>
Shielded Insert	26,300- <del>lbs</del>

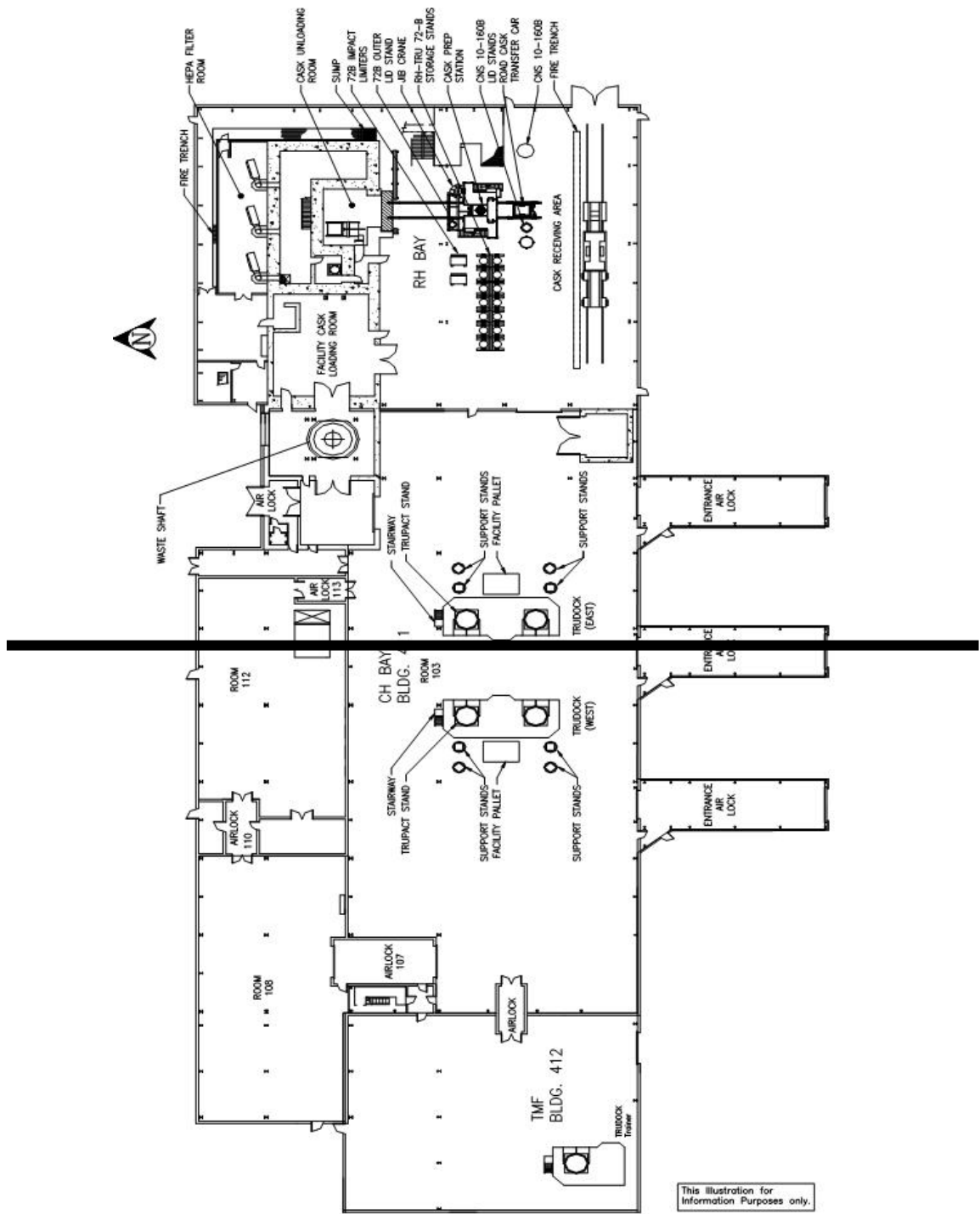
3

## FIGURES



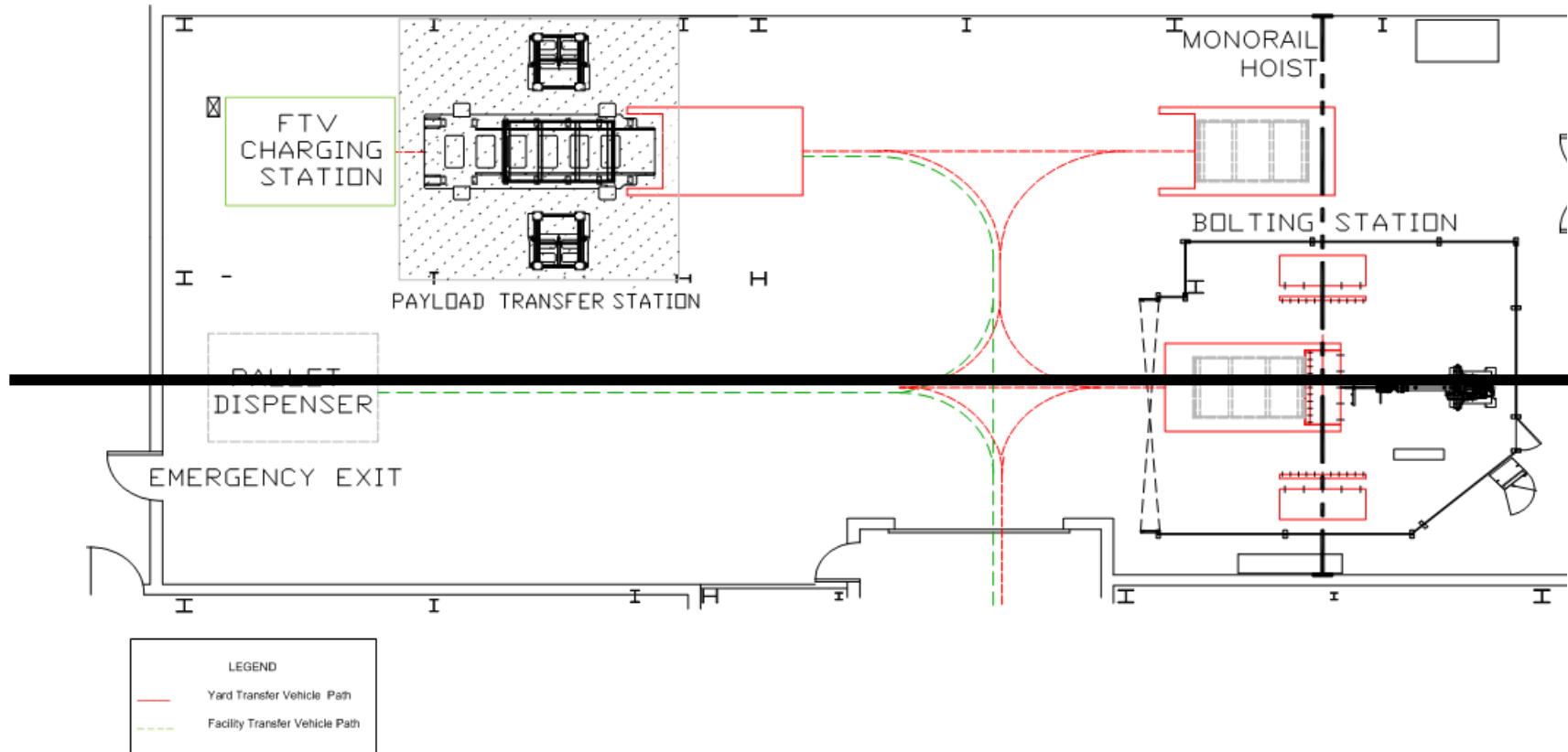


**Figure A1-1**  
**Waste Handling Building – CH TRU Mixed Waste Container Storage and Surge Areas**

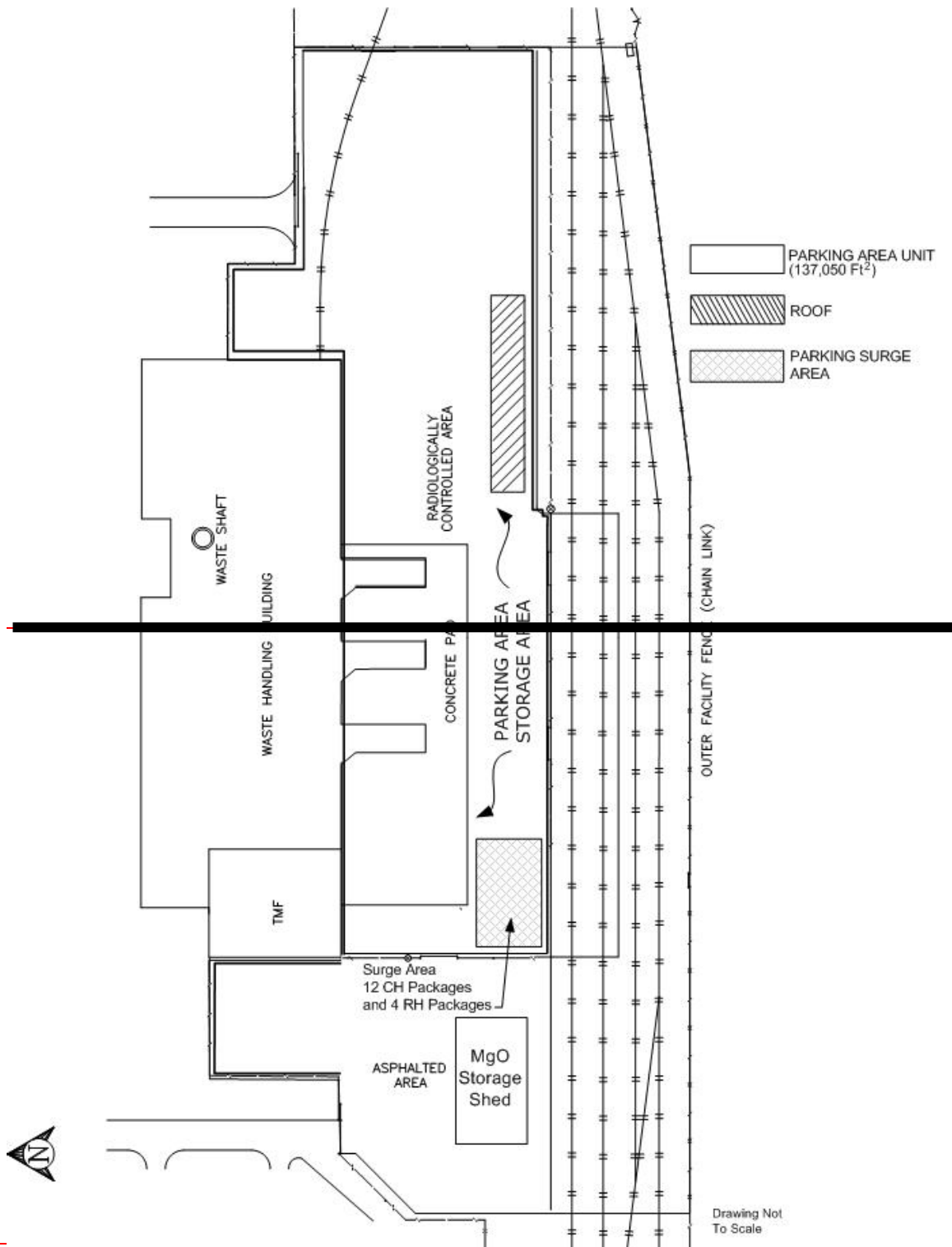


NTP-03-074  
 WASTF HANDLING BUILDING

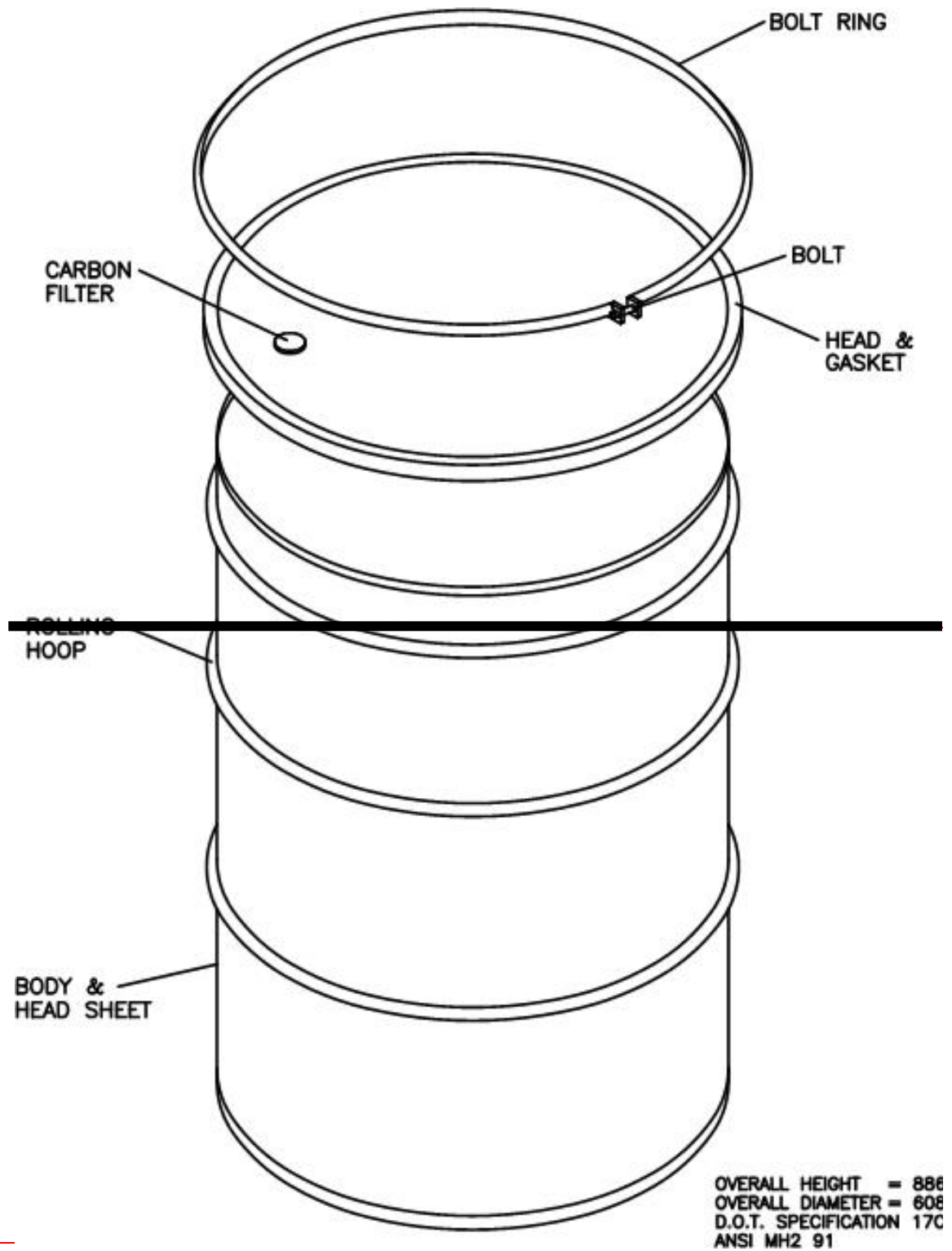
**Figure A1-1a**  
**Waste Handling Building Plan (Ground Floor)**



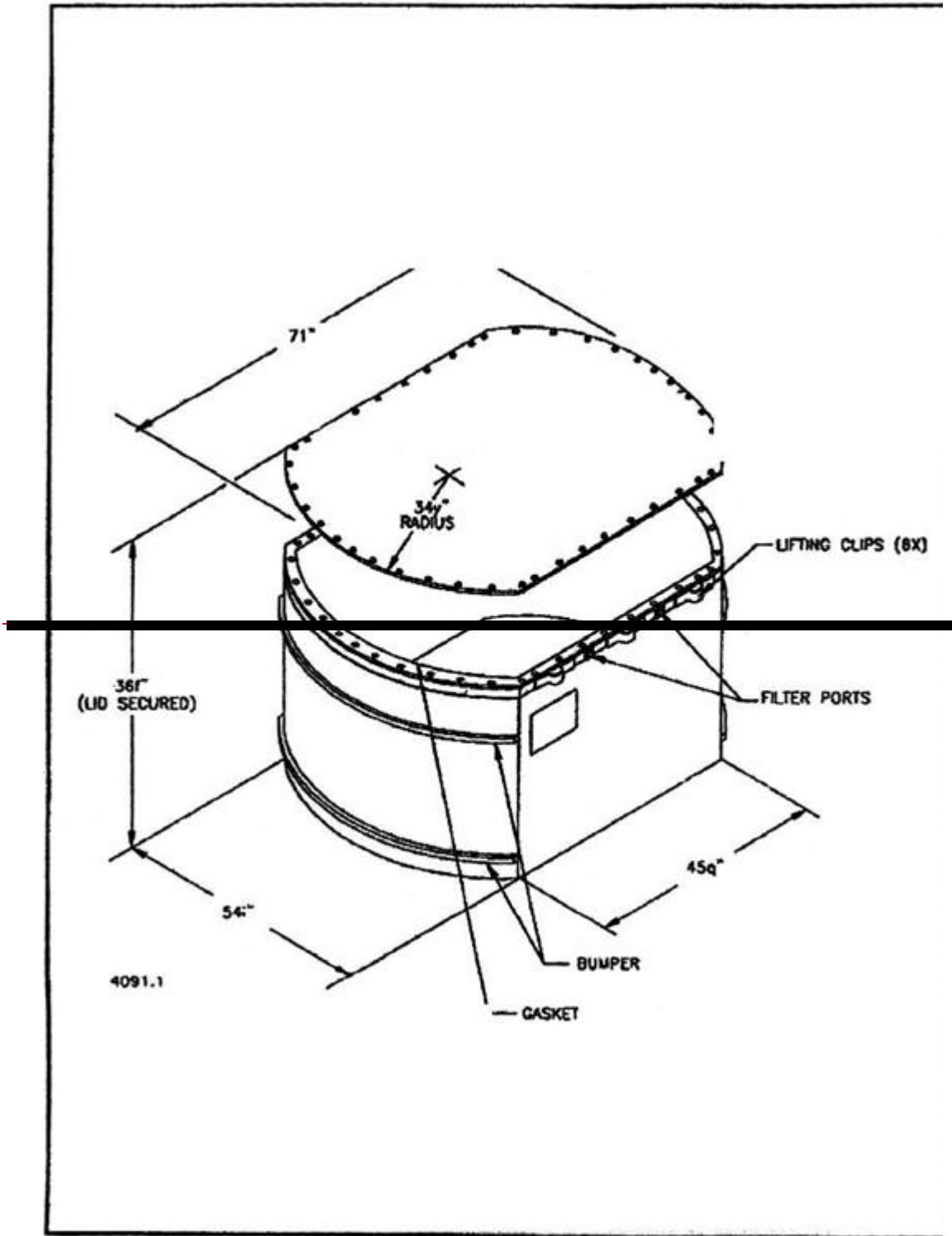
**Figure A1-1b**  
**Waste Handling Building Plan (Room 108 Detail)**



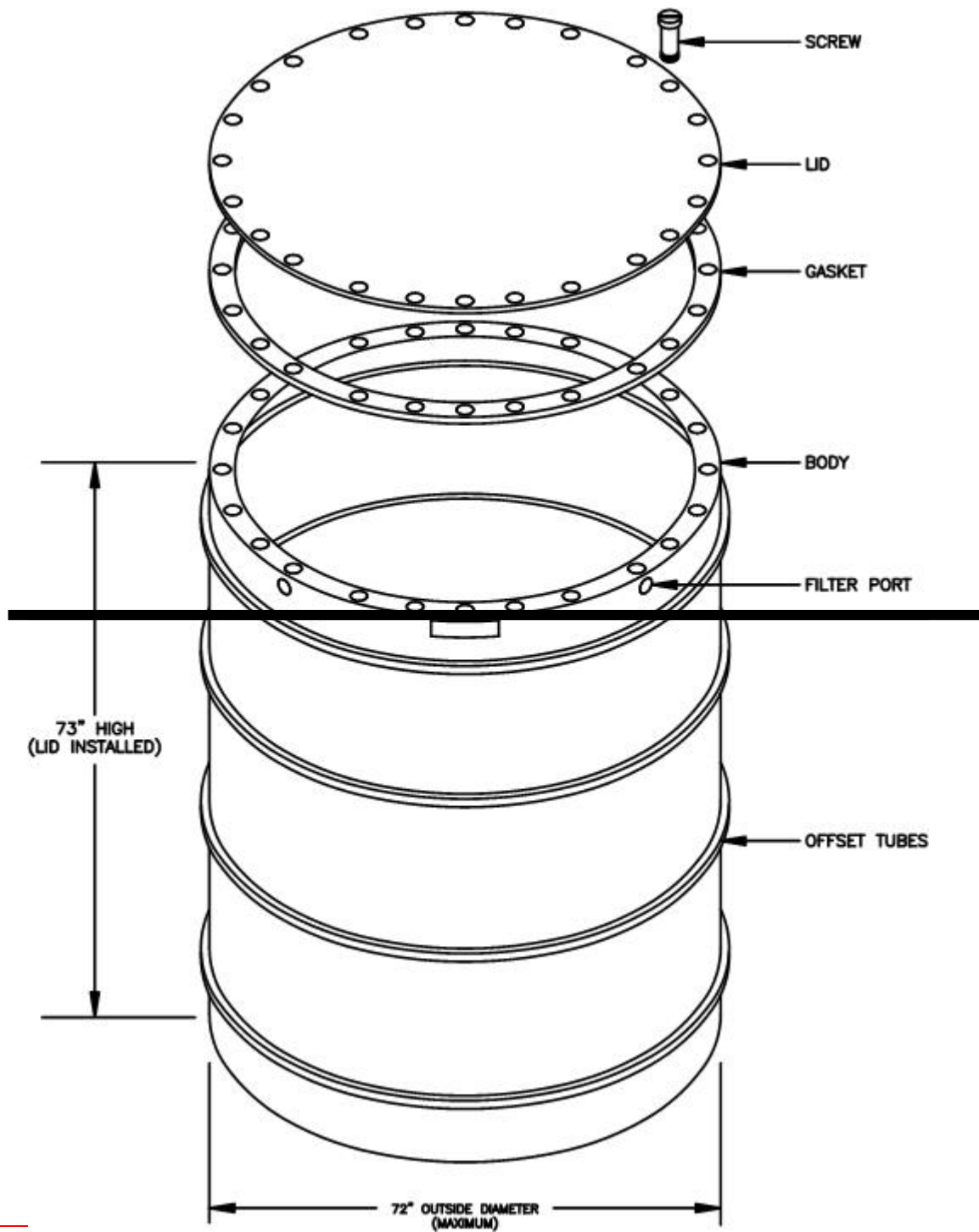
**Figure A1-2**  
**Parking Area – Container Storage and Surge Areas**



**Figure A1-3**  
**Standard 55-Gallon Drum (Typical)**

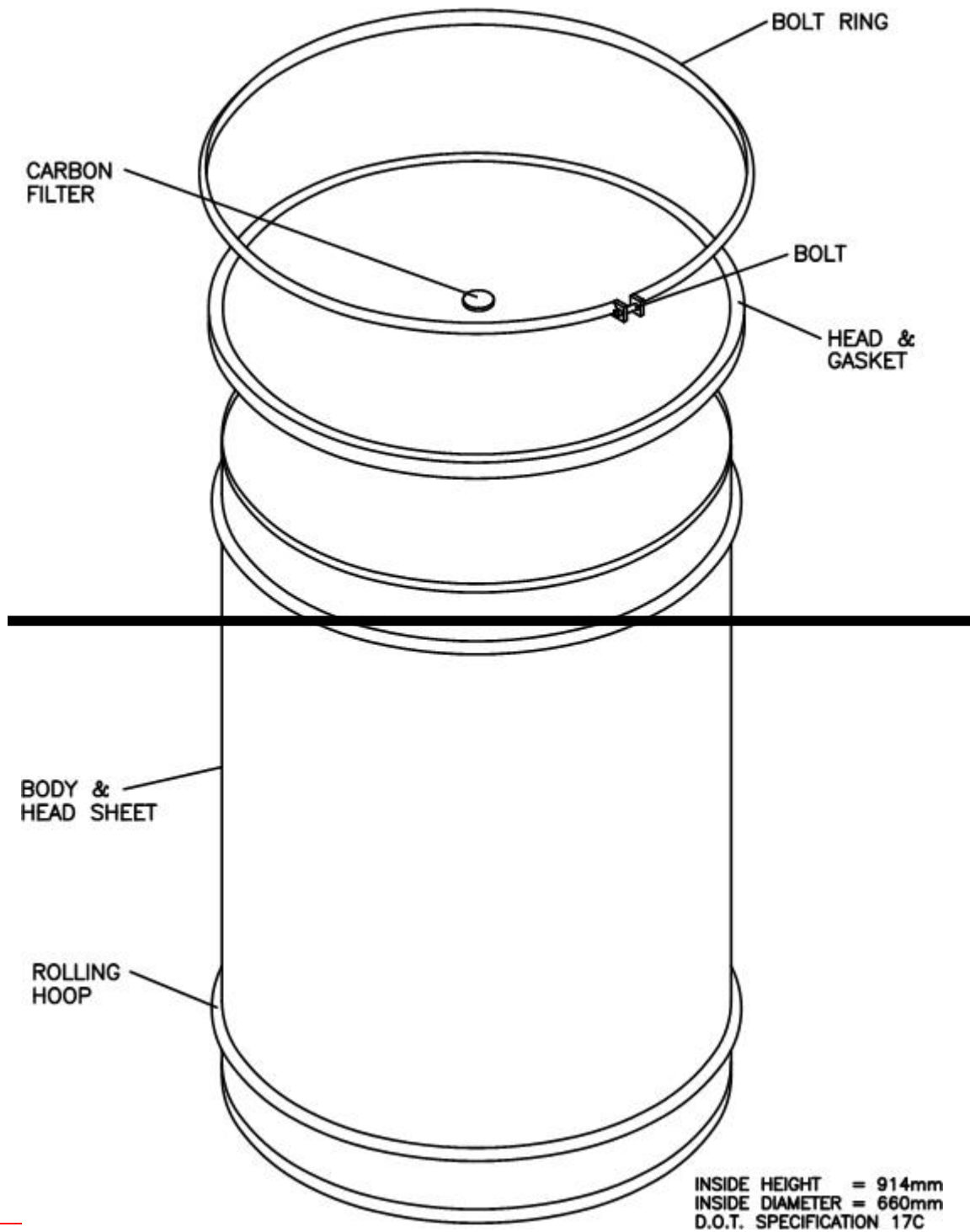


**Figure A1-4**  
**Standard Waste Box**



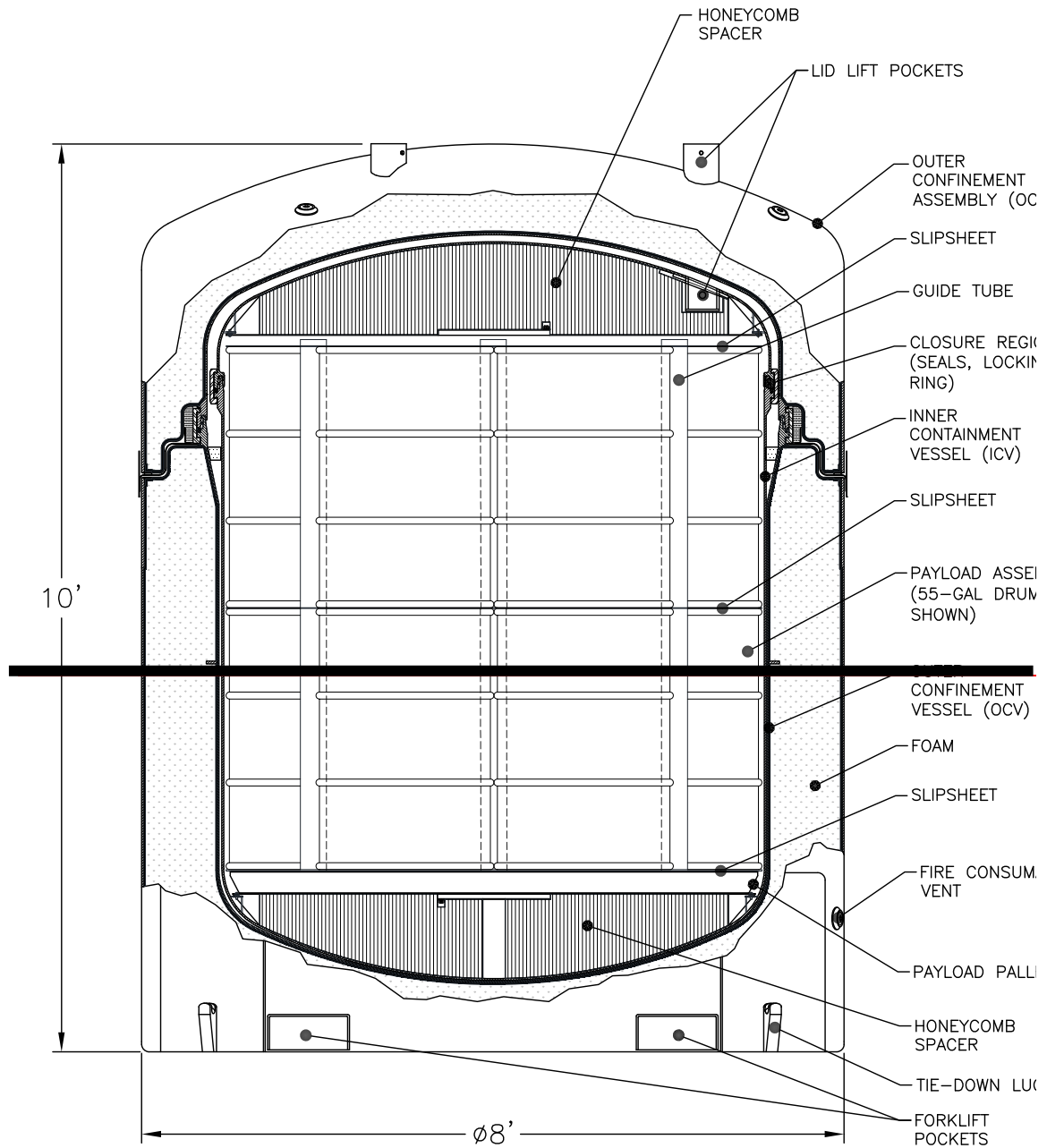
**Figure A1-5**  
**Ten-Drum Overpack**





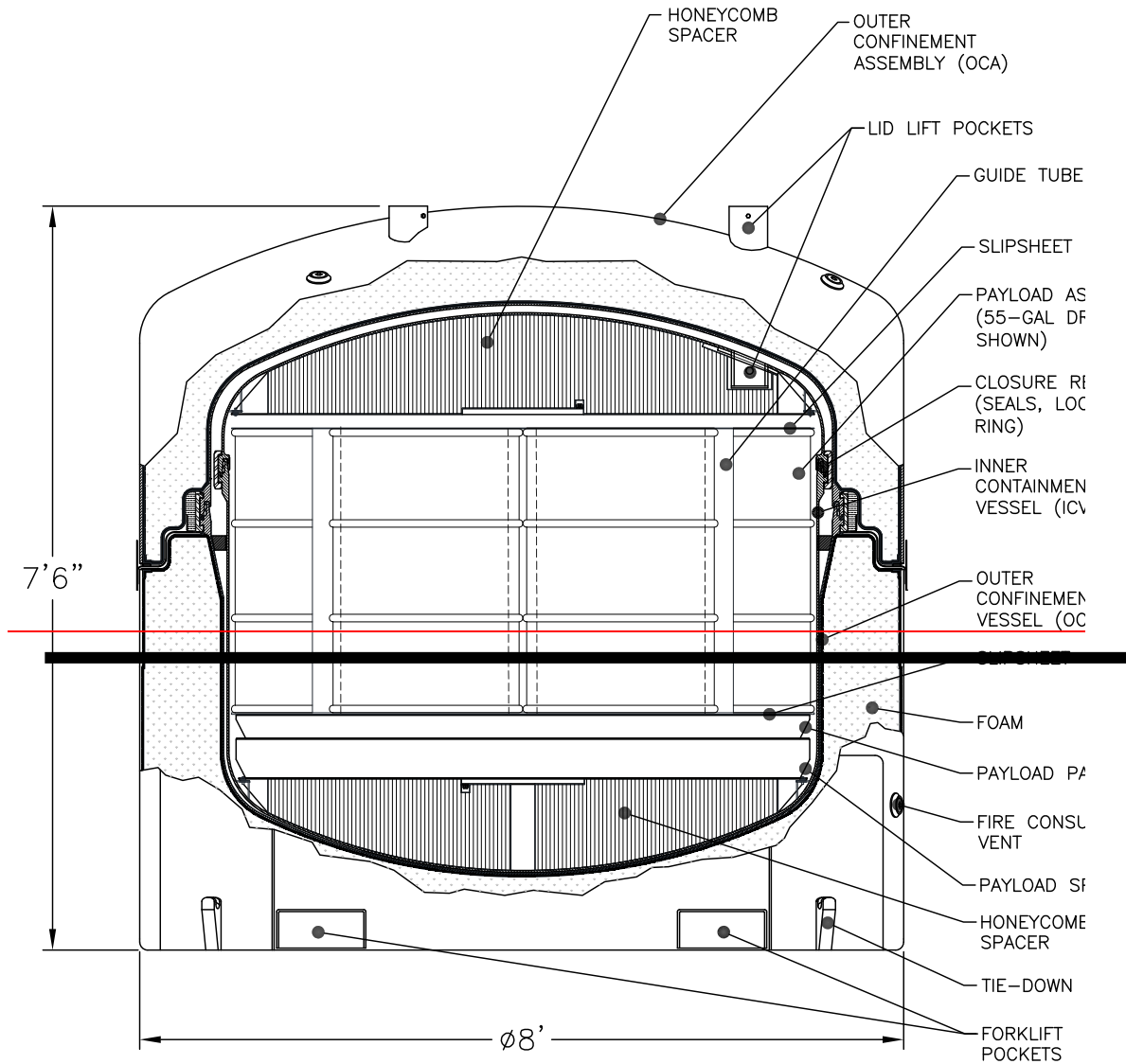
**Figure A1-6**  
**85-Gallon Drum**





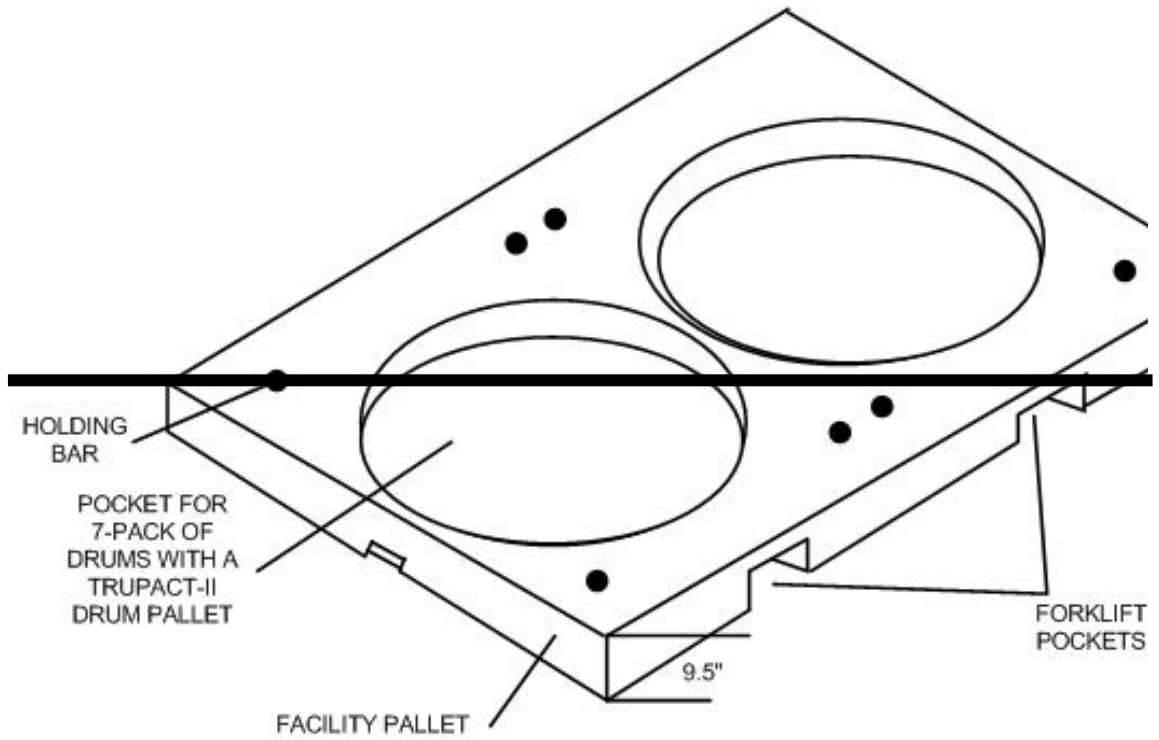
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 NOT TO SCALE

**Figure A1-8a**  
**TRUPACT-II Shipping Container for CH Transuranic Mixed Waste (Schematic)**

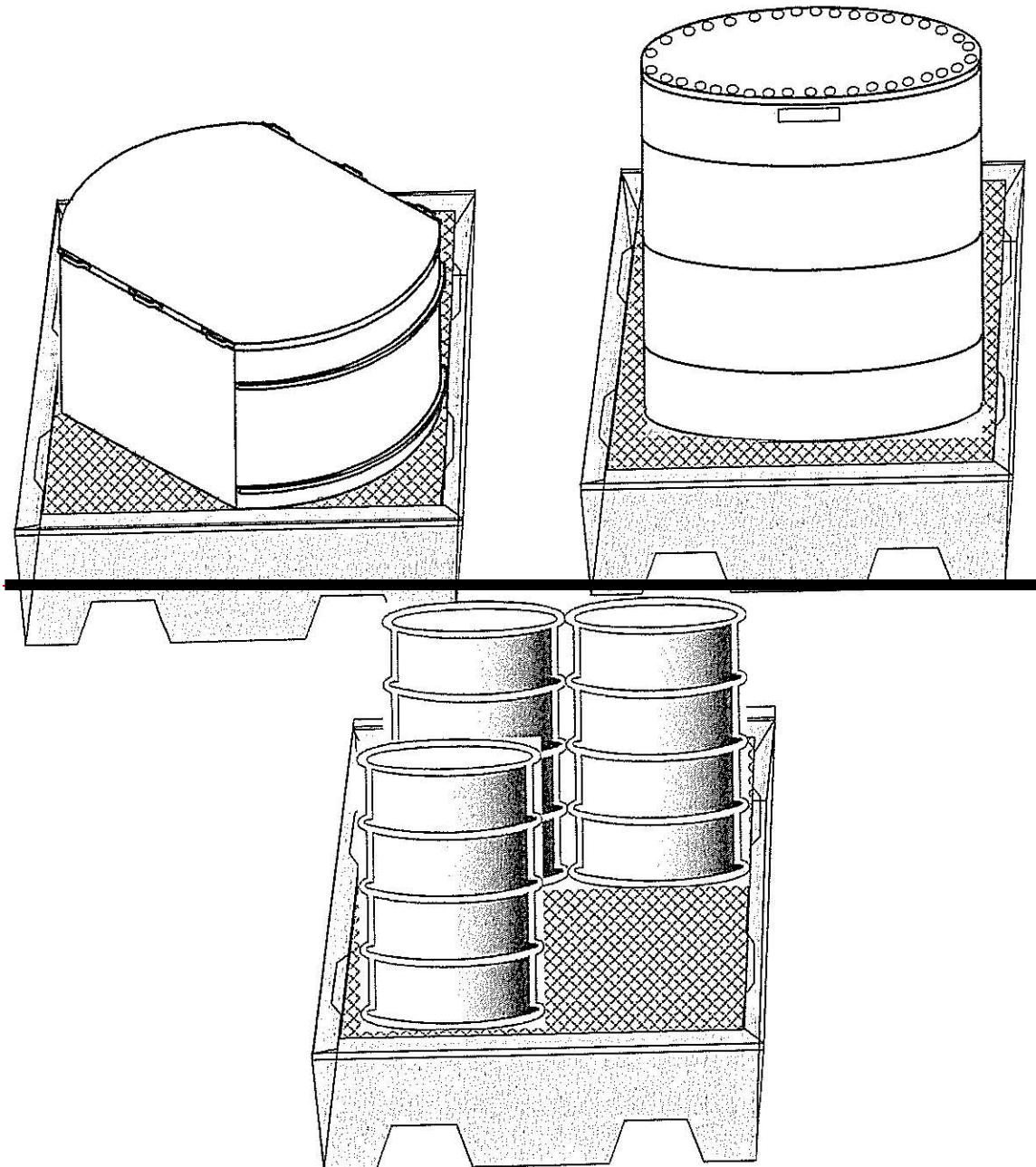


THIS ILLUSTRATION FOR INFORMATIONAL PURPOSES  
 NOT TO SCALE

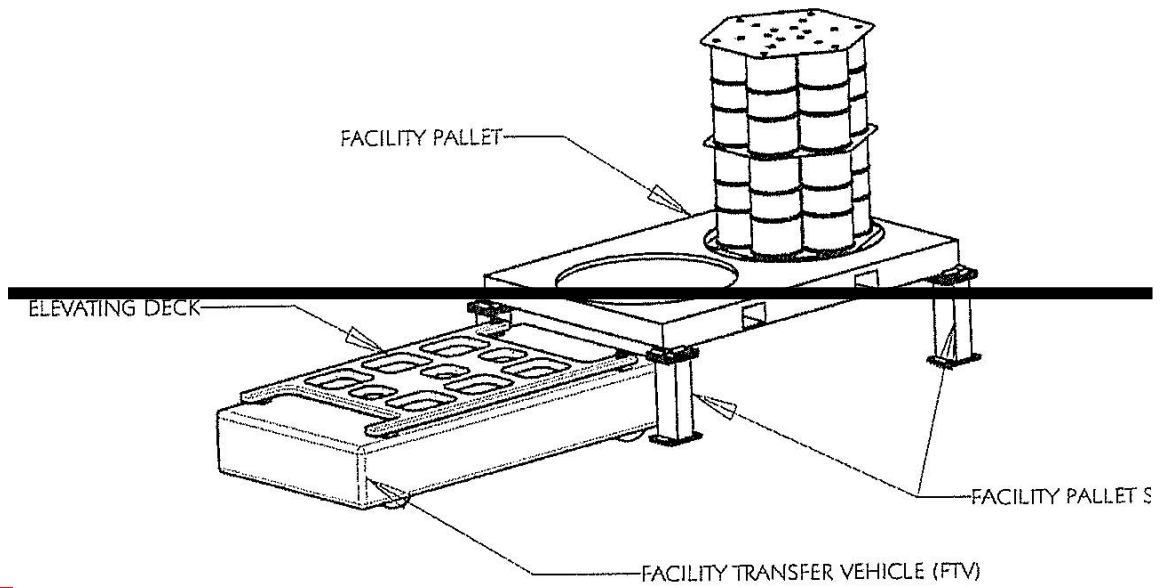
**Figure A1-8b**  
**Typical HalfPACT Shipping Container for CH Transuranic Mixed Waste (Schematic)**



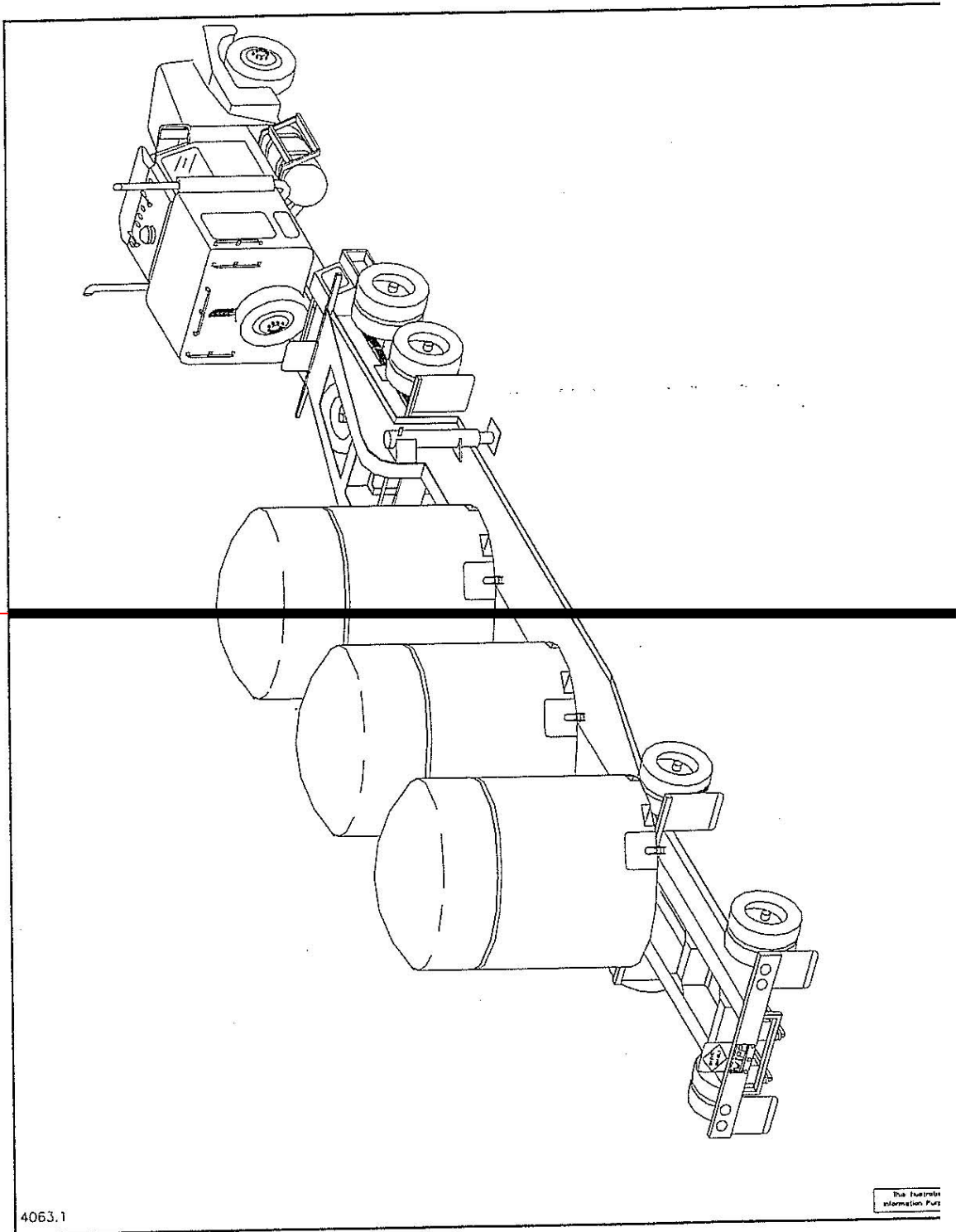
**Figure A1-10**  
**Facility Pallet for Seven-Pack of Drums**



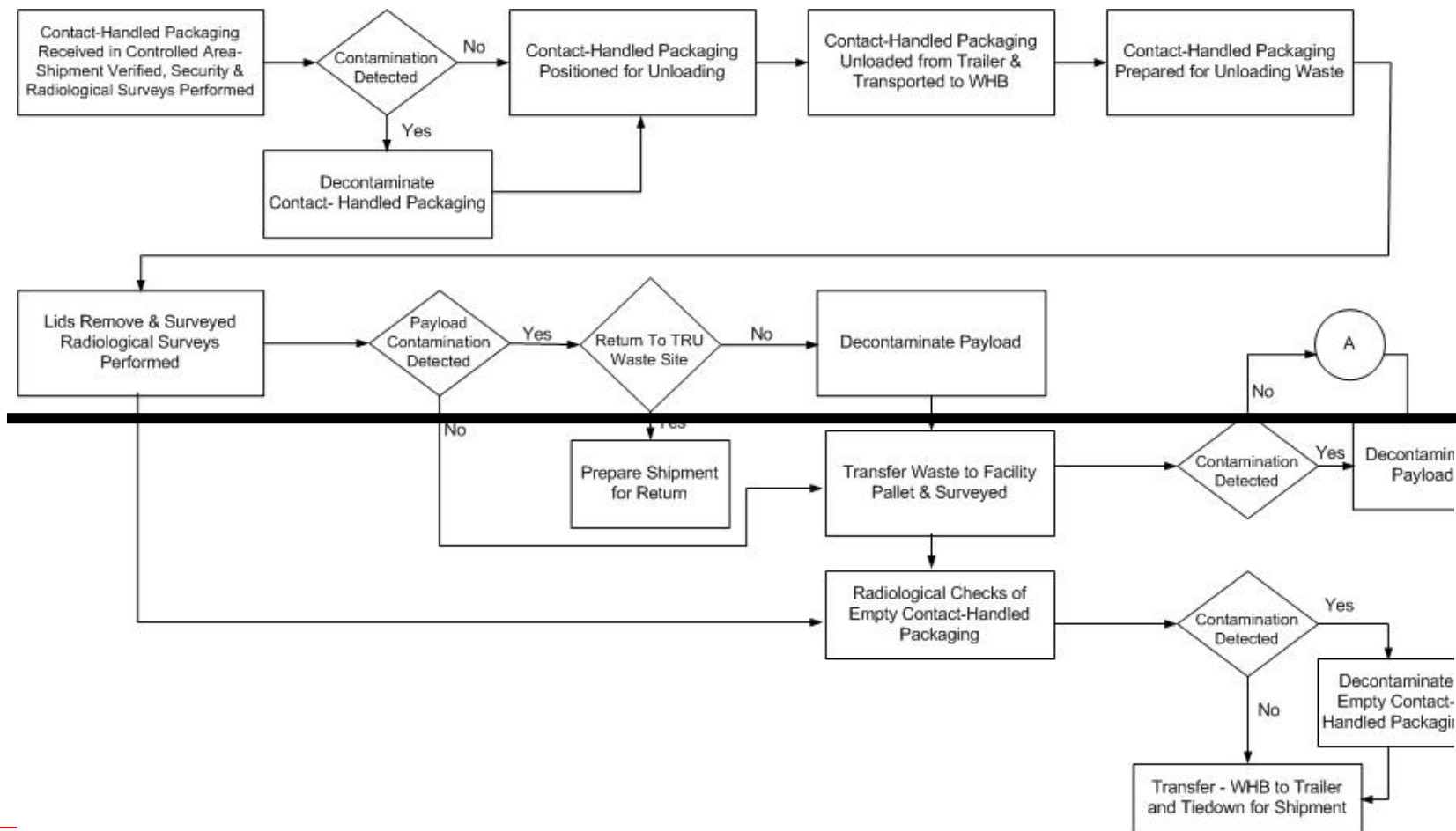
**Figure A1-10a**  
**Typical Containment Pallet**



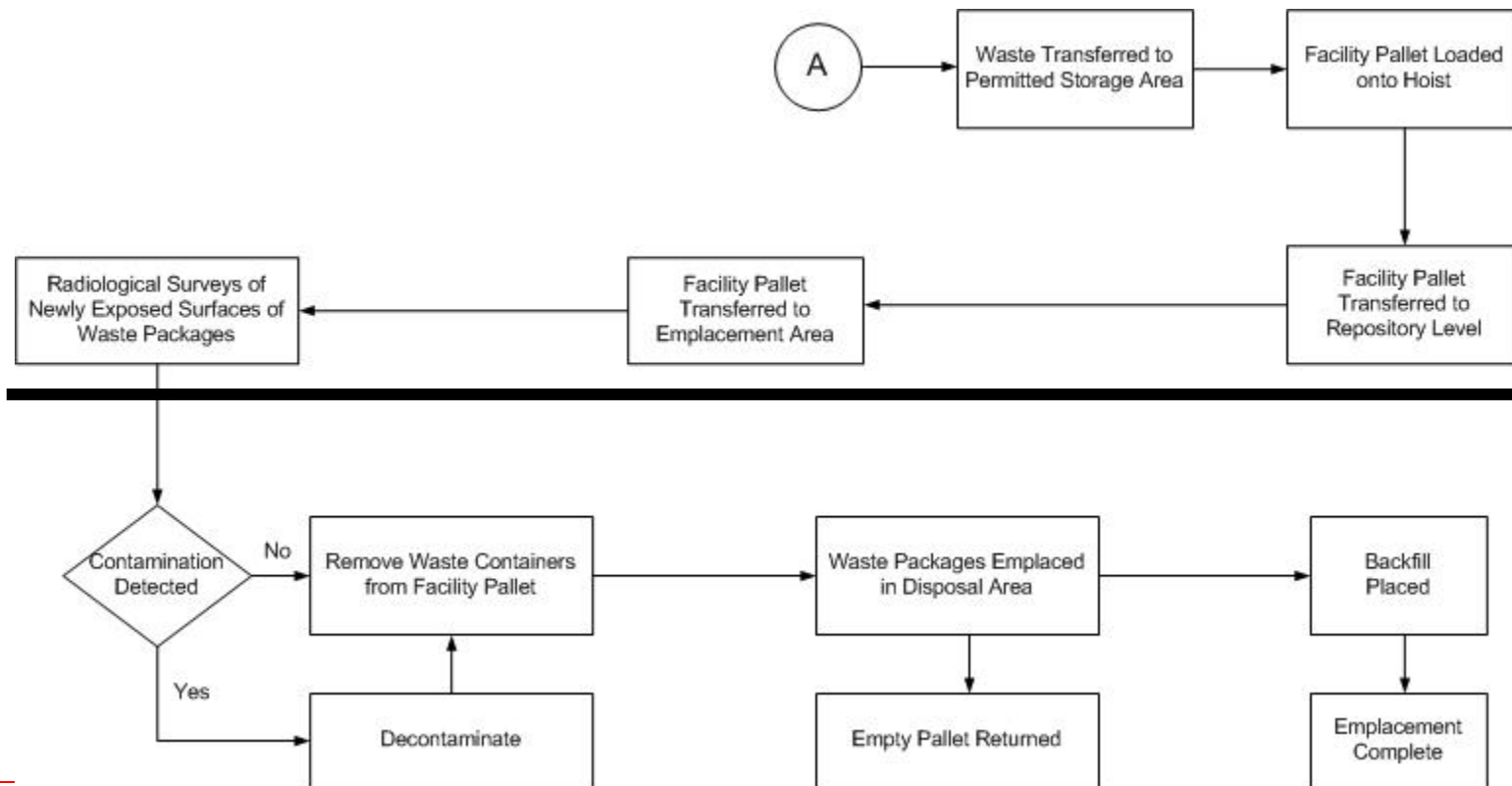
**Figure A1-11**  
**Facility Transfer Vehicle, Facility Pallet, and Typical Pallet Stand**



**Figure A1-12**  
**TRUPACT-II Containers on Trailer**

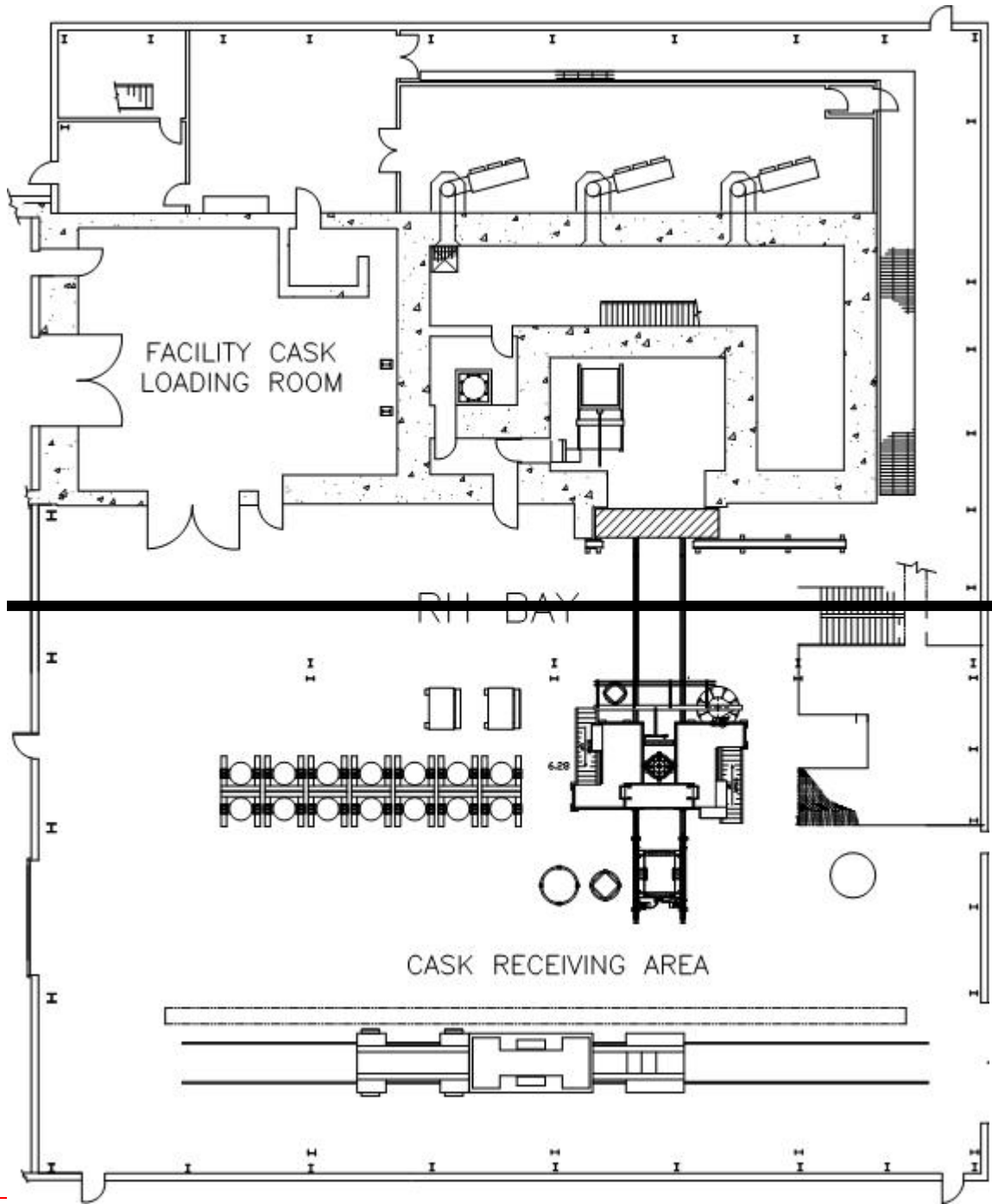


**Figure A1-13**  
**WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram**

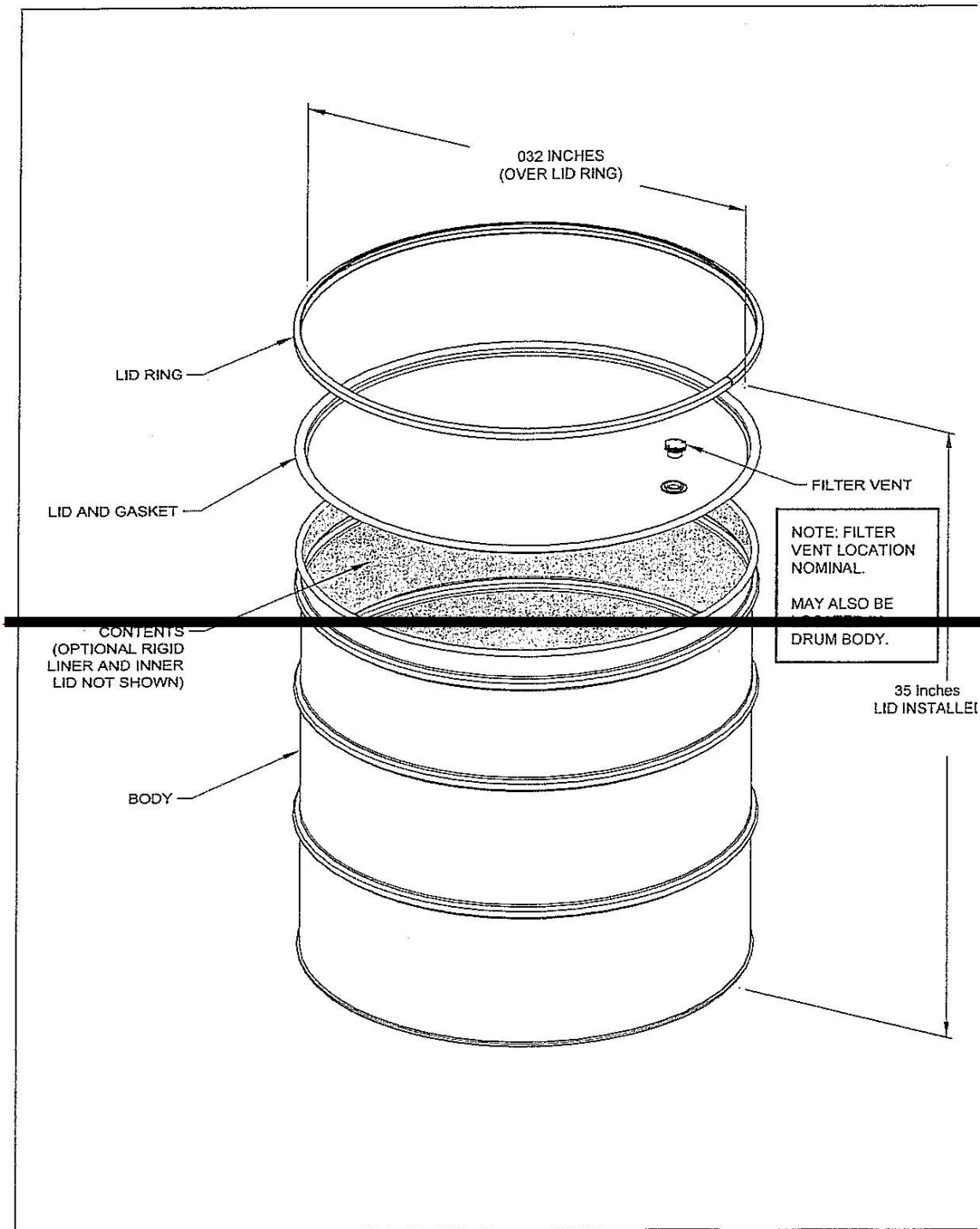


**Figure A1-13**  
**WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)**

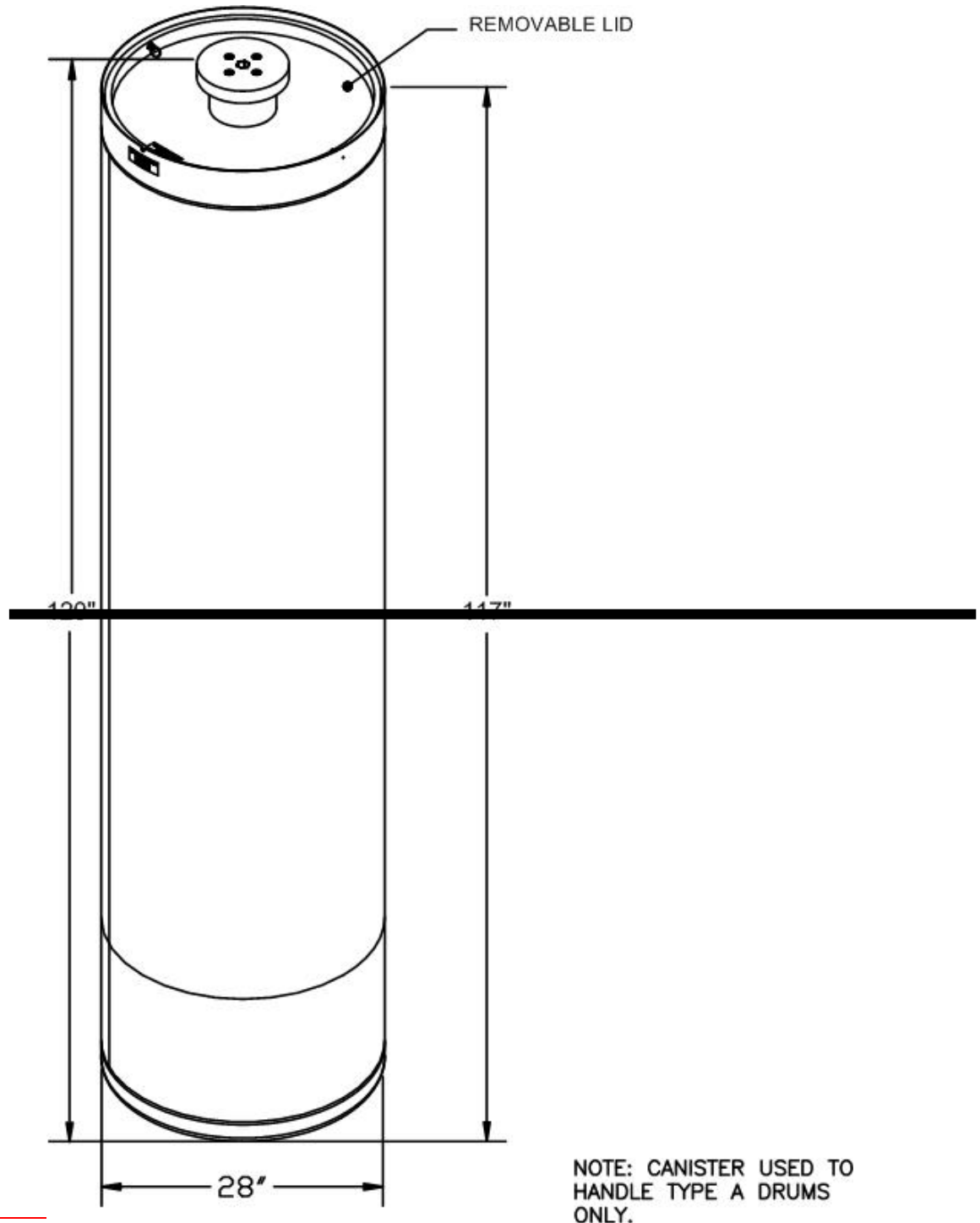




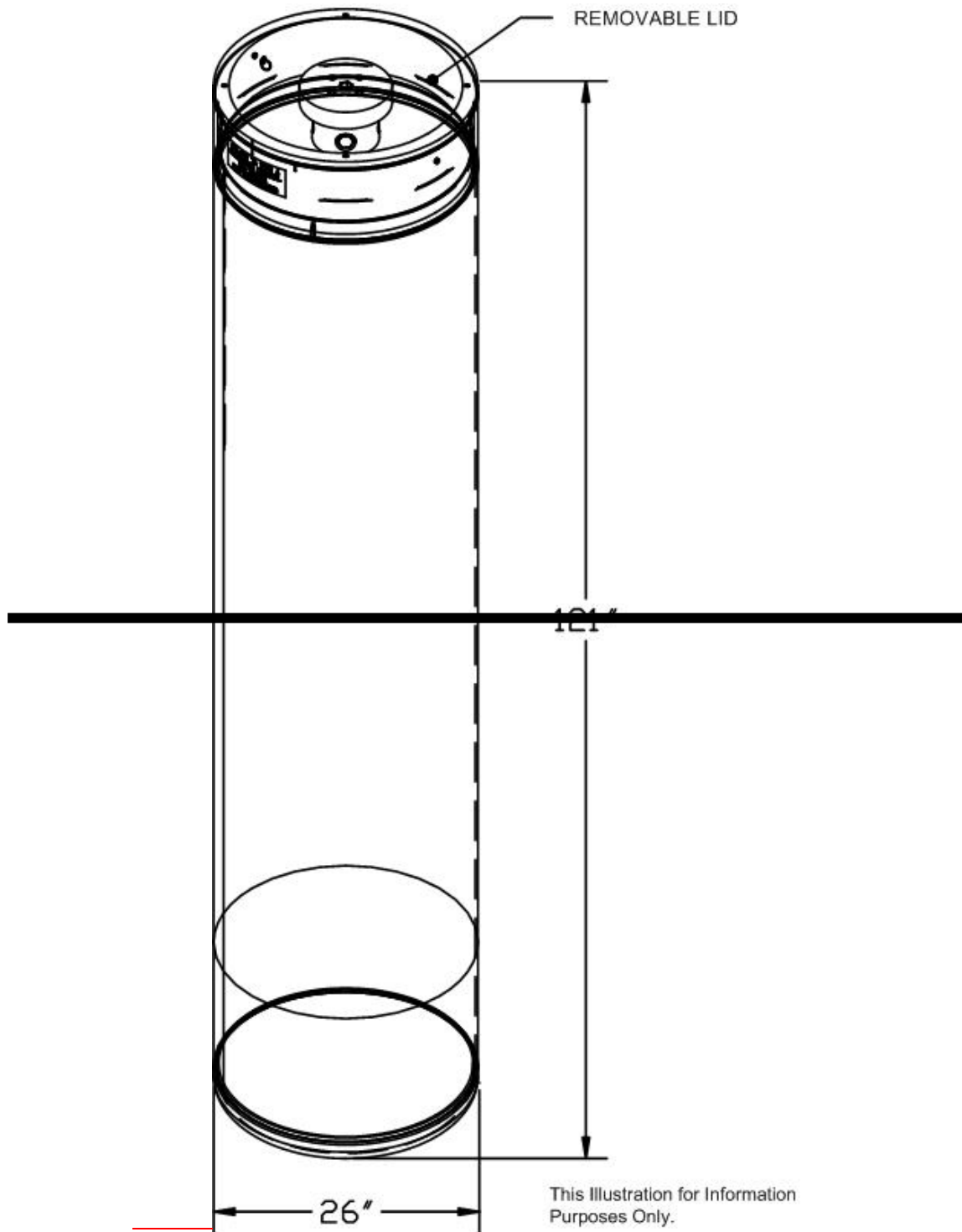
**Figure A1-14a**  
**RH Bay Ground Floor**



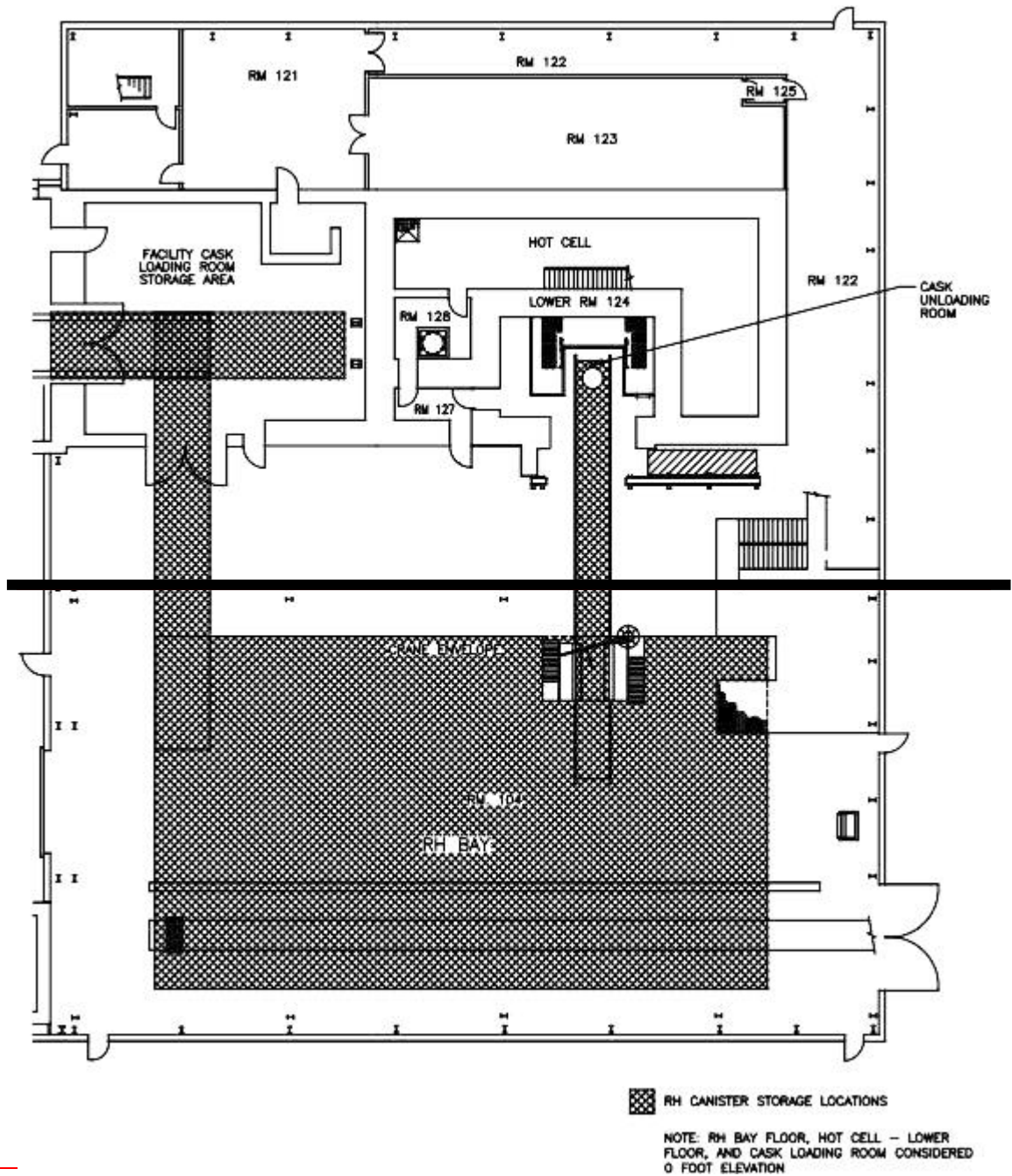
**Figure A1-15**  
**100-Gallon Drum**



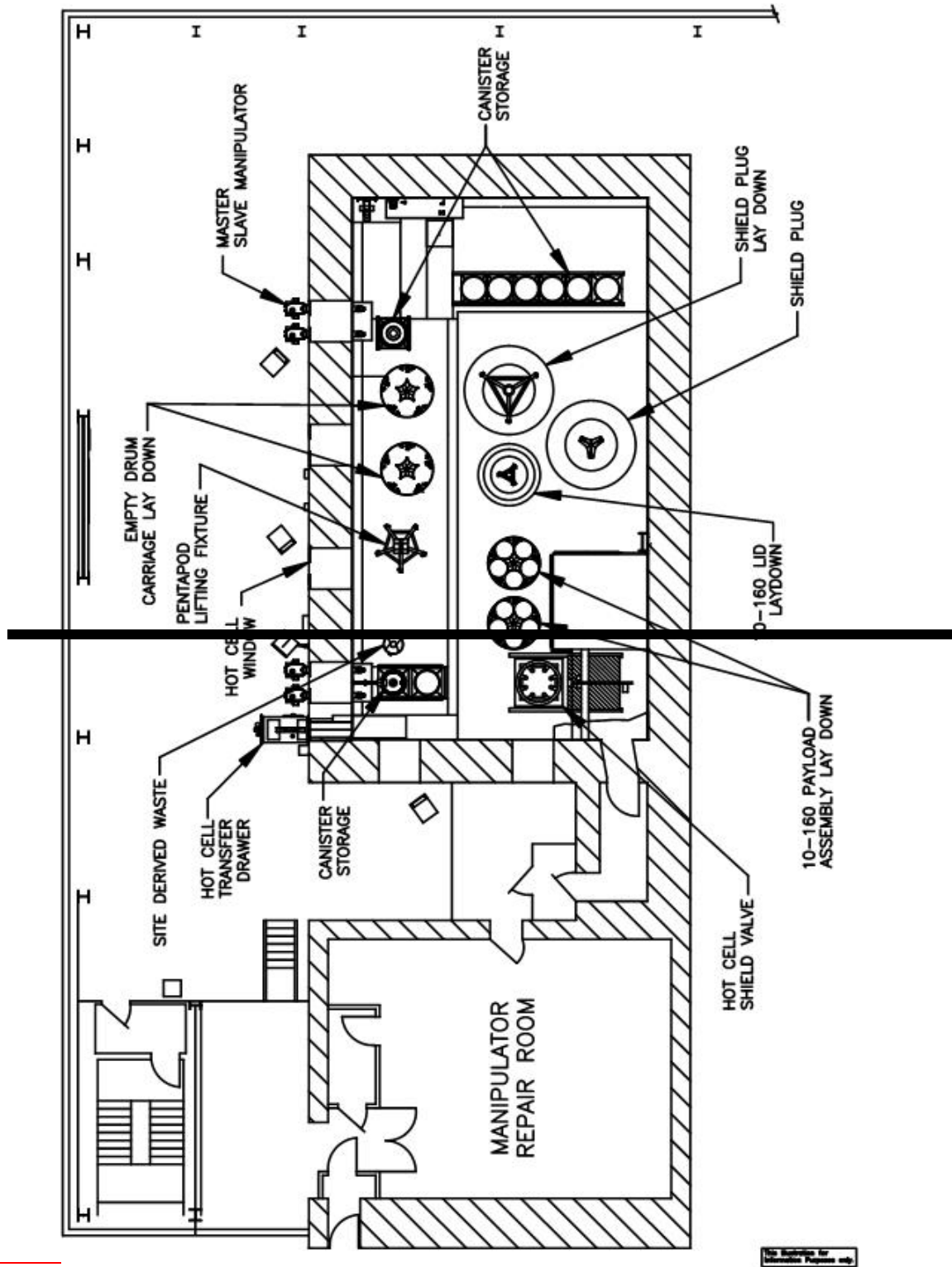
**Figure A1-16**  
**Facility Canister Assembly**



**Figure A1-16a**  
**RH-TRU 72-B Canister Assembly**

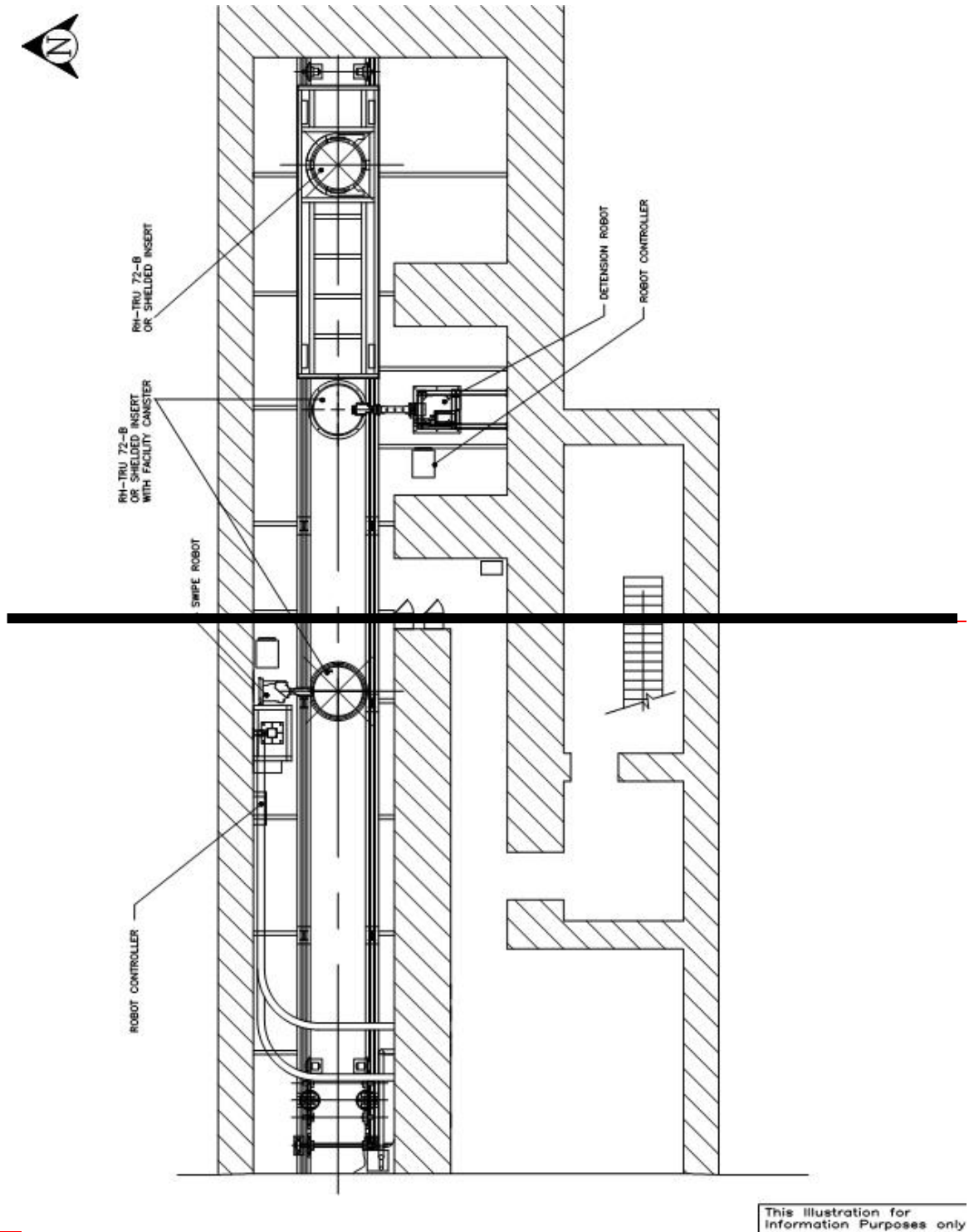


**Figure A1-17a**  
**RH Bay, Cask Unloading Room, Hot Cell, Facility Cask Loading Room**

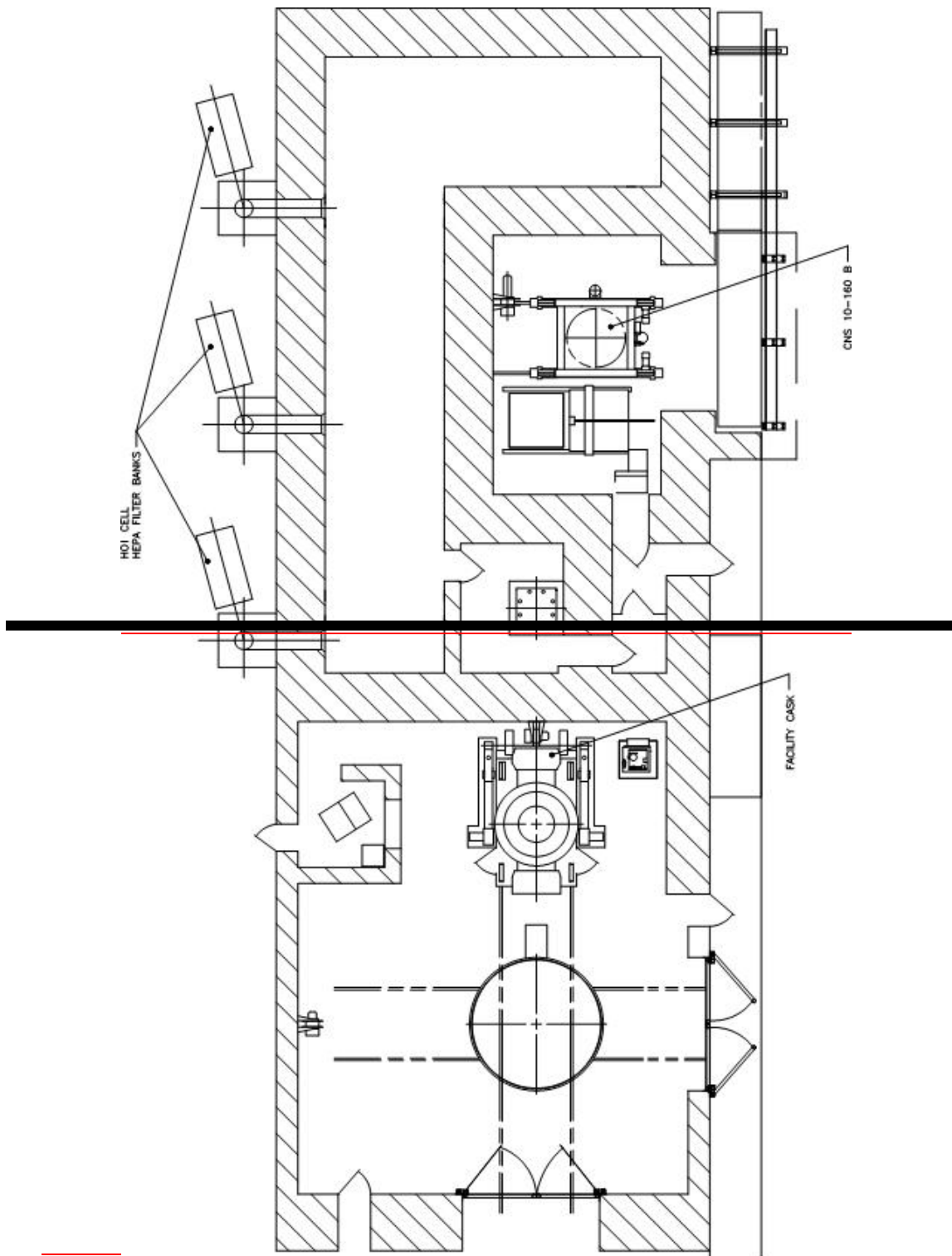


**Figure A1-17b**  
**RH Hot Cell Storage Area**



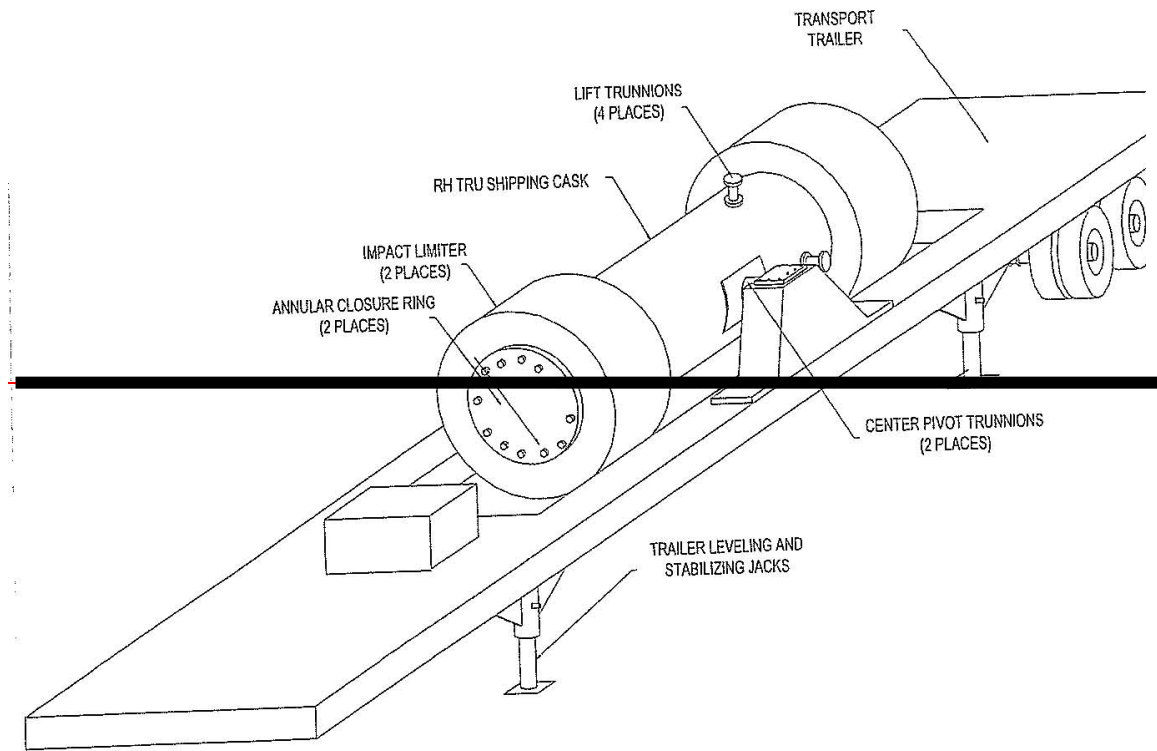


**Figure A1-17c**  
**RH Canister Transfer Cell Storage Area**

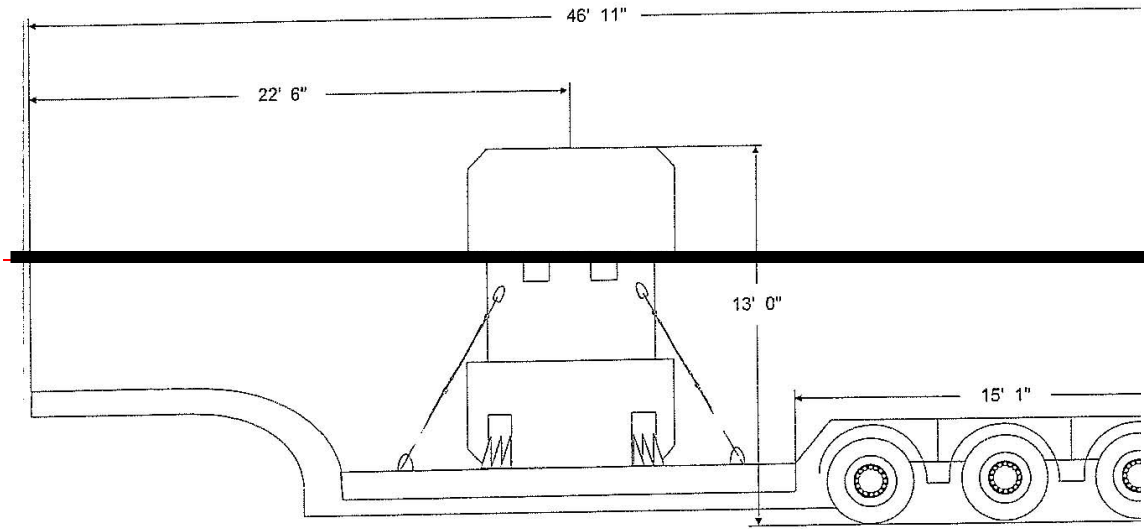


**Figure A1-17d**  
**RH Facility Cask Loading Room Storage Area**

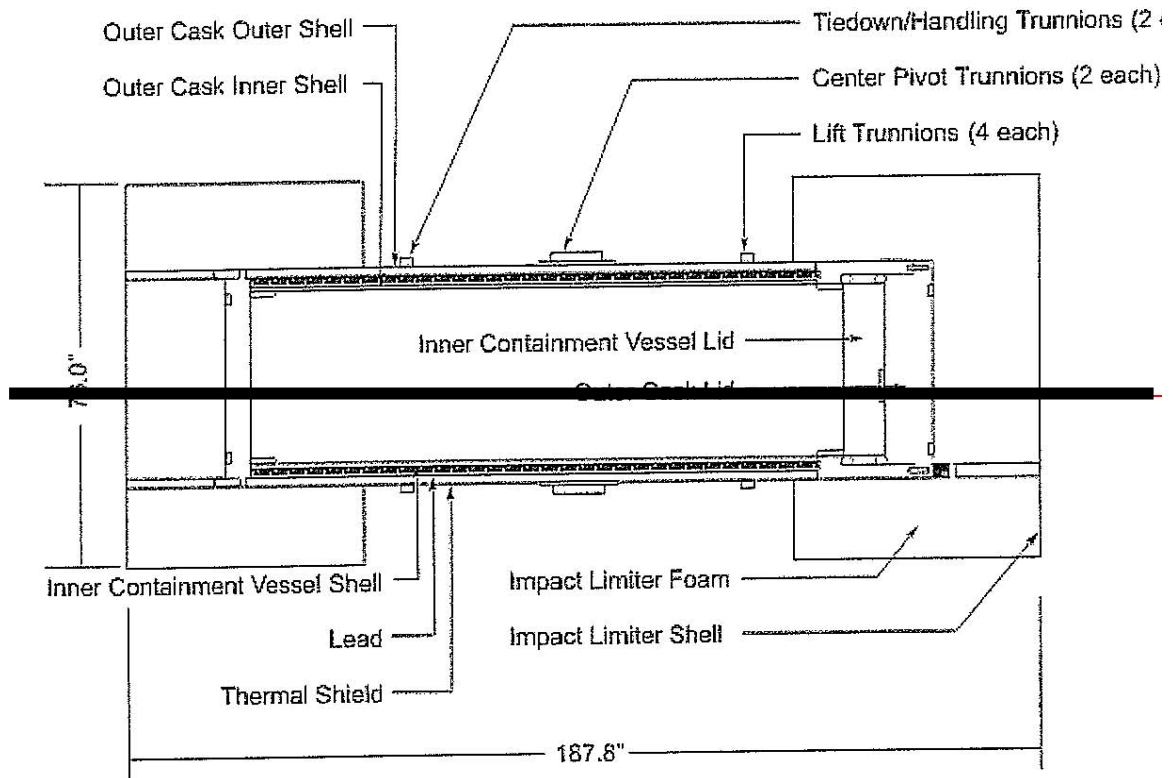




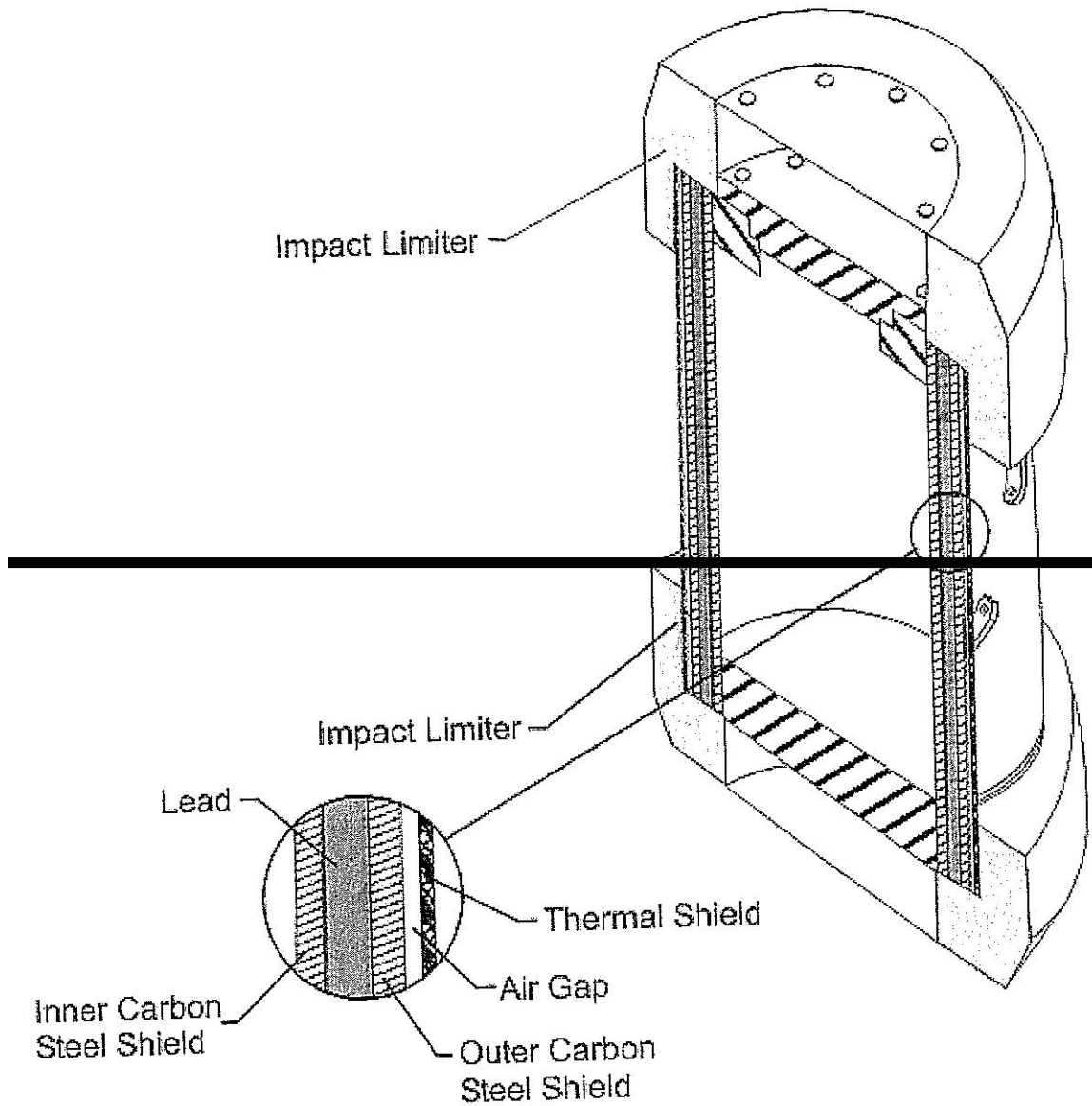
**Figure A1-18**  
**RH-TRU 72-B Shipping Cask on Trailer**



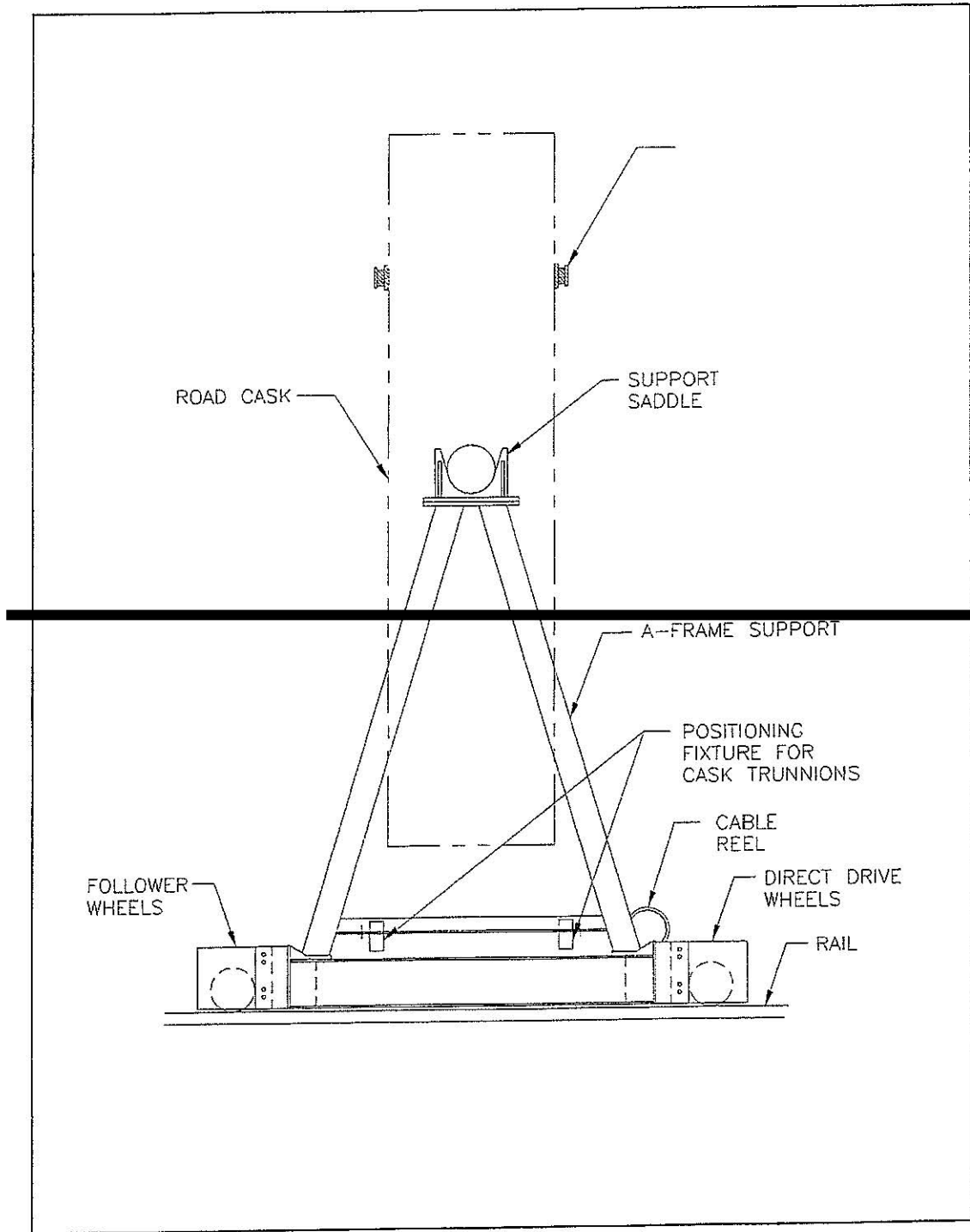
**Figure A1-19**  
**CNS 10-160B Shipping Cask on Trailer**



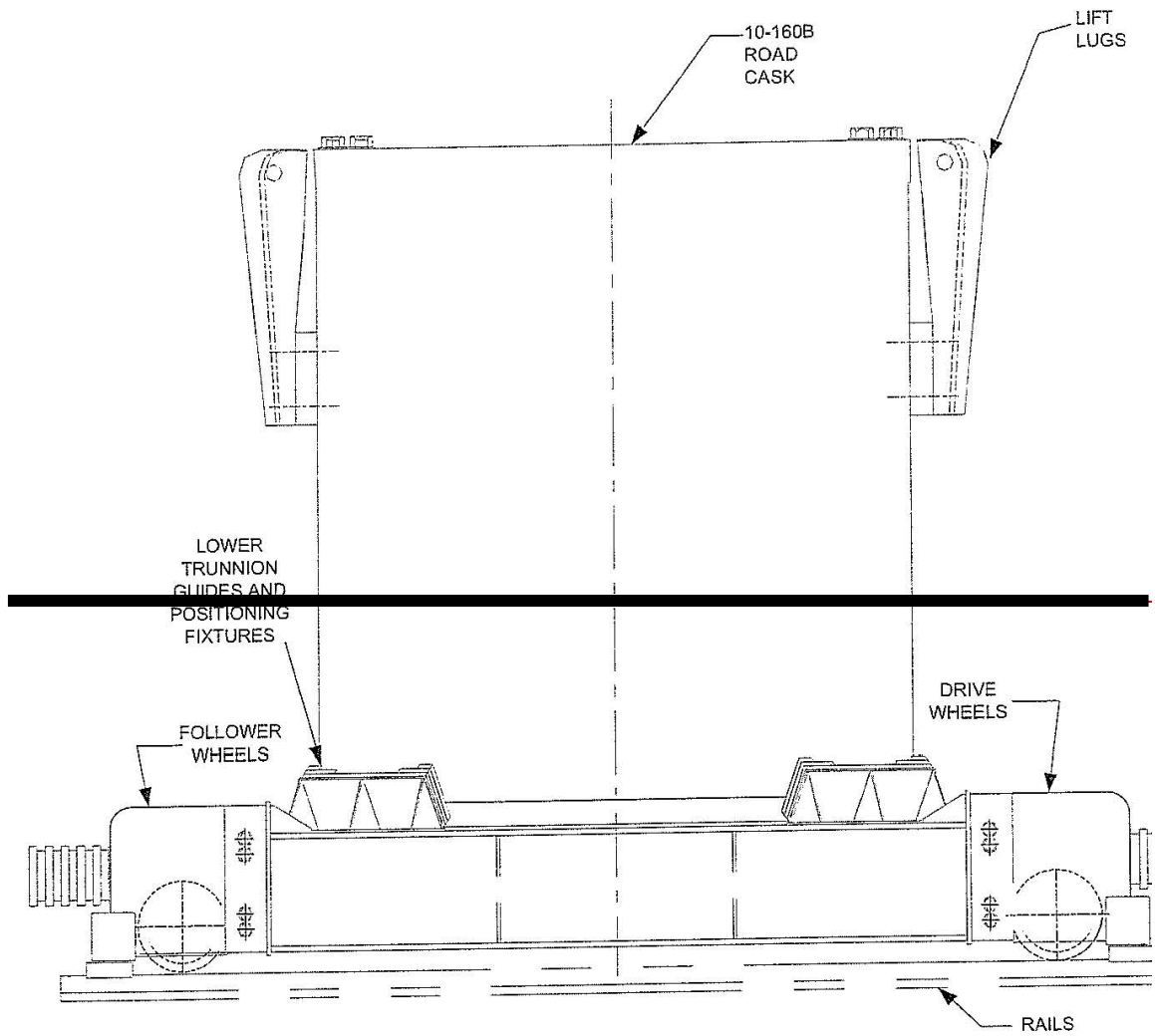
**Figure A1-20**  
**RH-TRU 72-B Shipping Cask for RH Transuranic Waste (Schematic)**



**Figure A1-21**  
**CNS-10-160B Shipping Cask for RH Transuranic Waste (Schematic)**

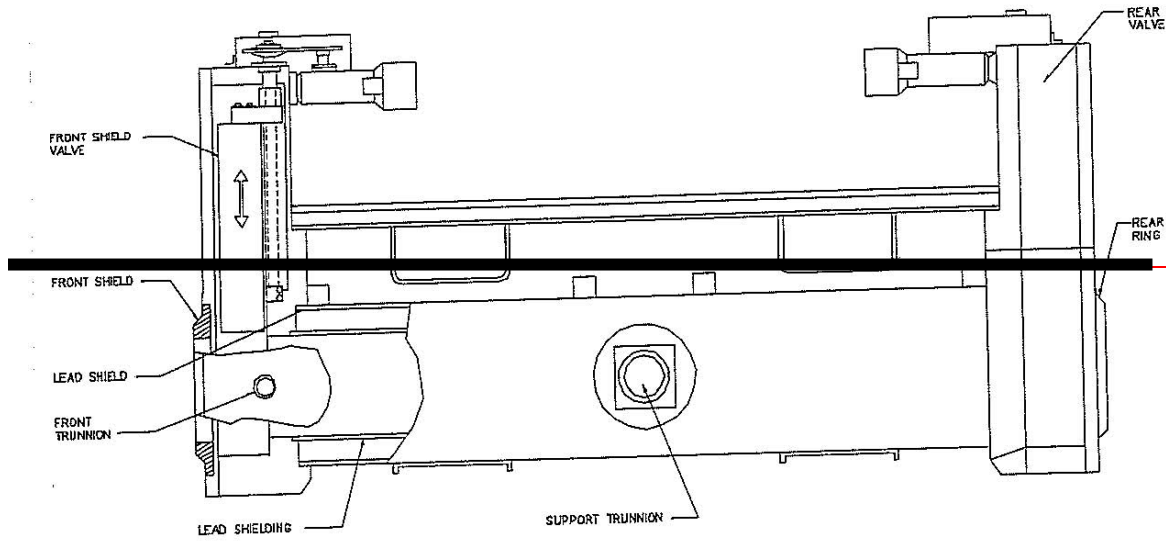


**Figure A1-22a**  
**RH-TRU 72-B Cask Transfer Car**

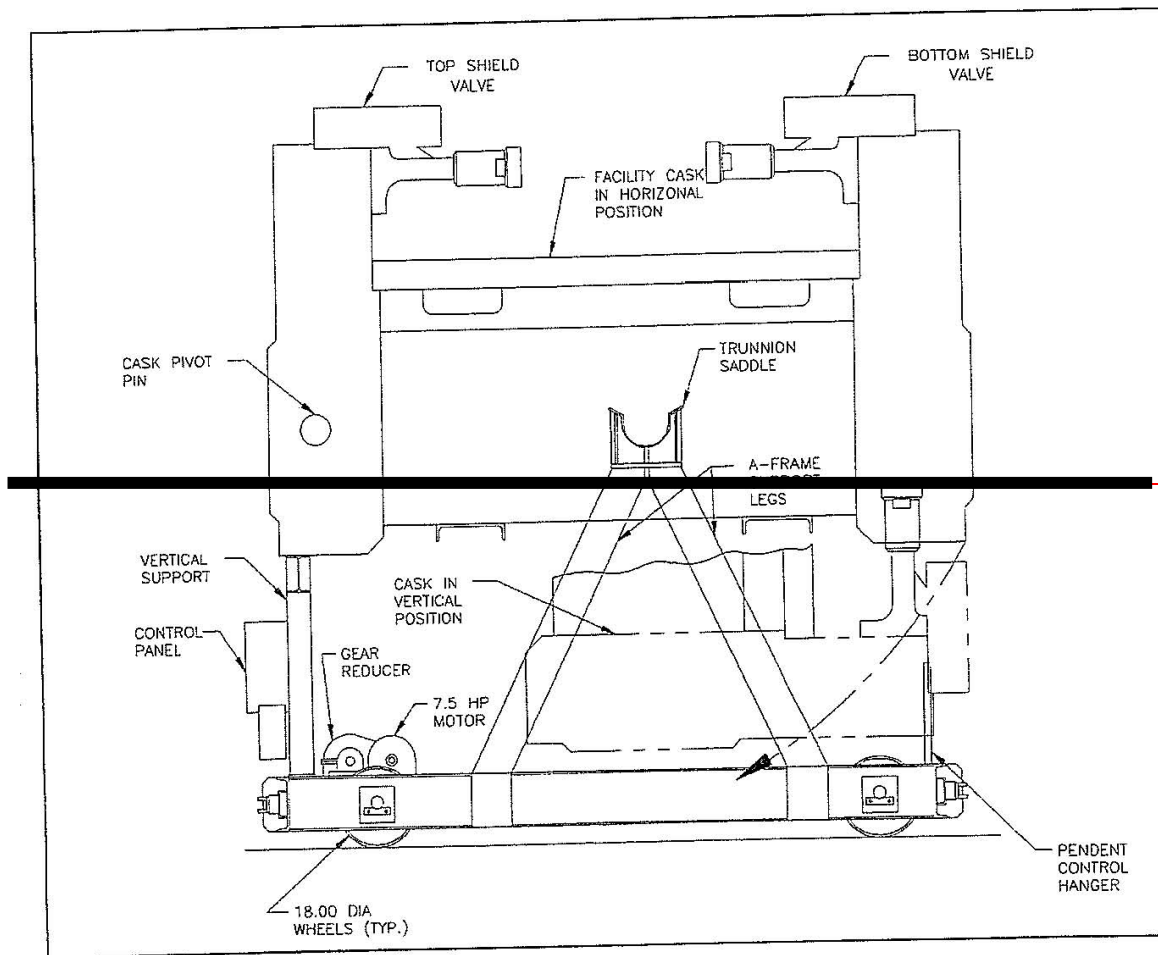


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**Figure A1-22b**  
**CNS 10-160B Cask Transfer Car**

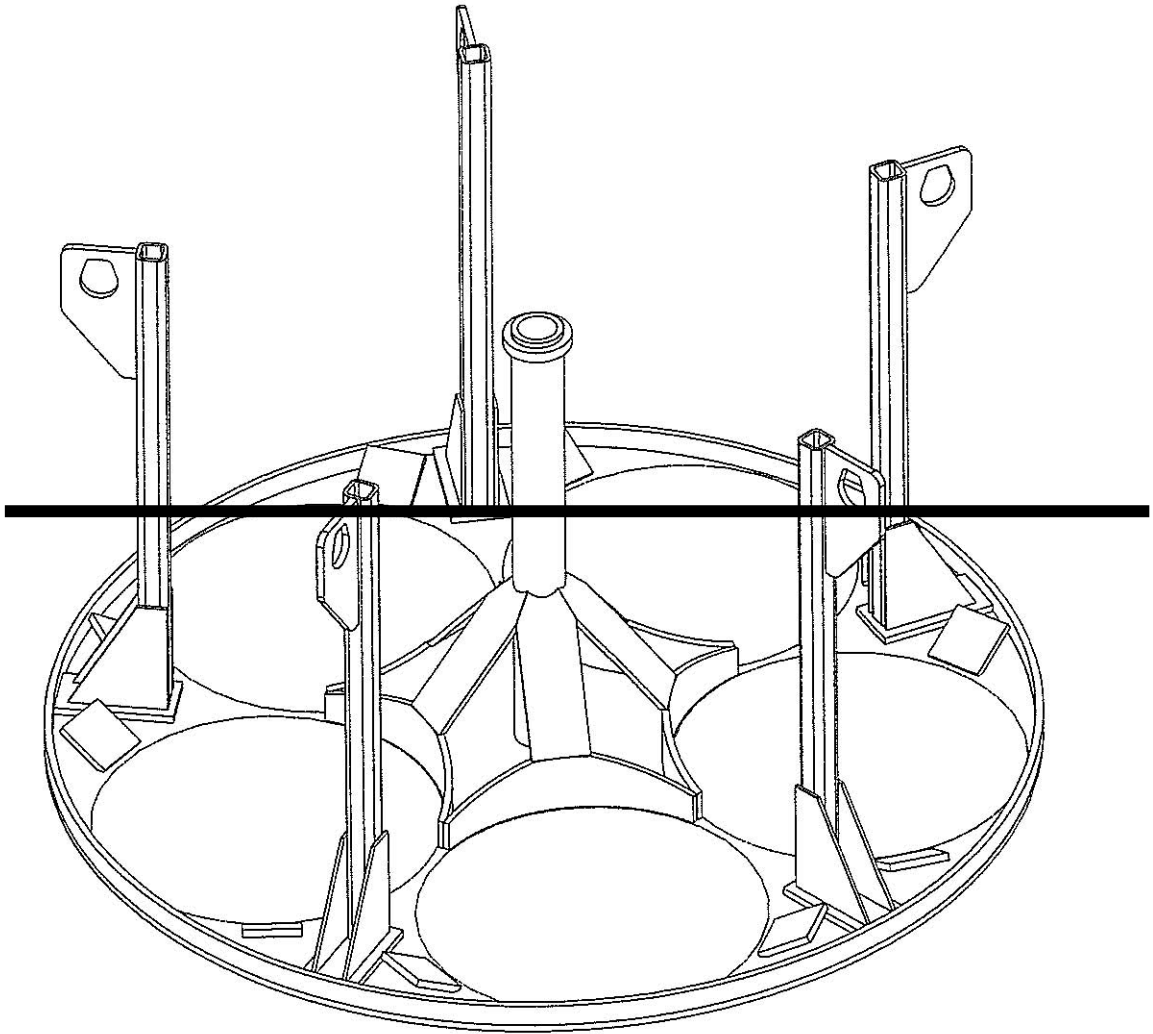


**Figure A1-23**  
**RH Transuranic Waste Facility Cask**



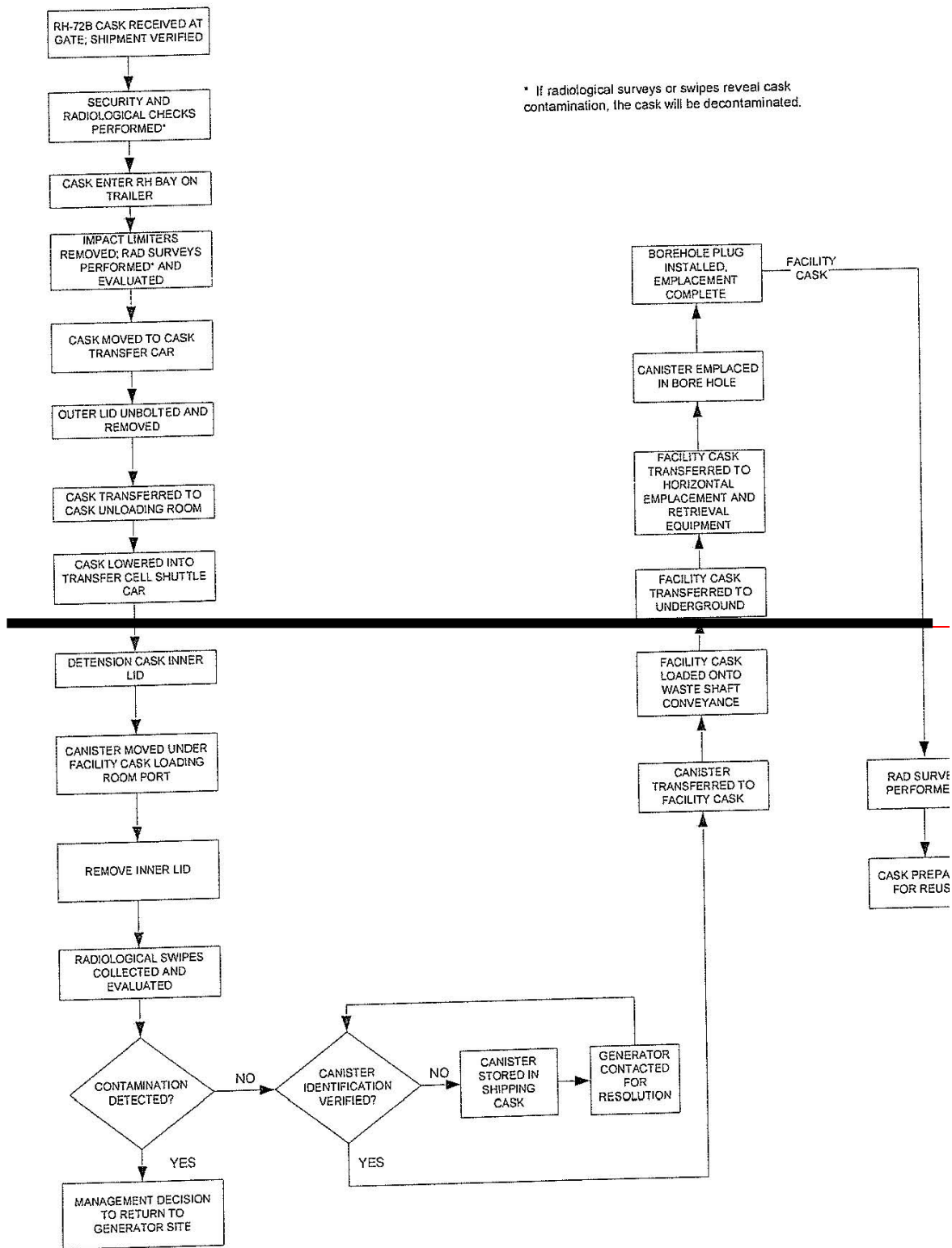
**Figure A1-24**  
**RH Facility Cask Transfer Car (Side View)**





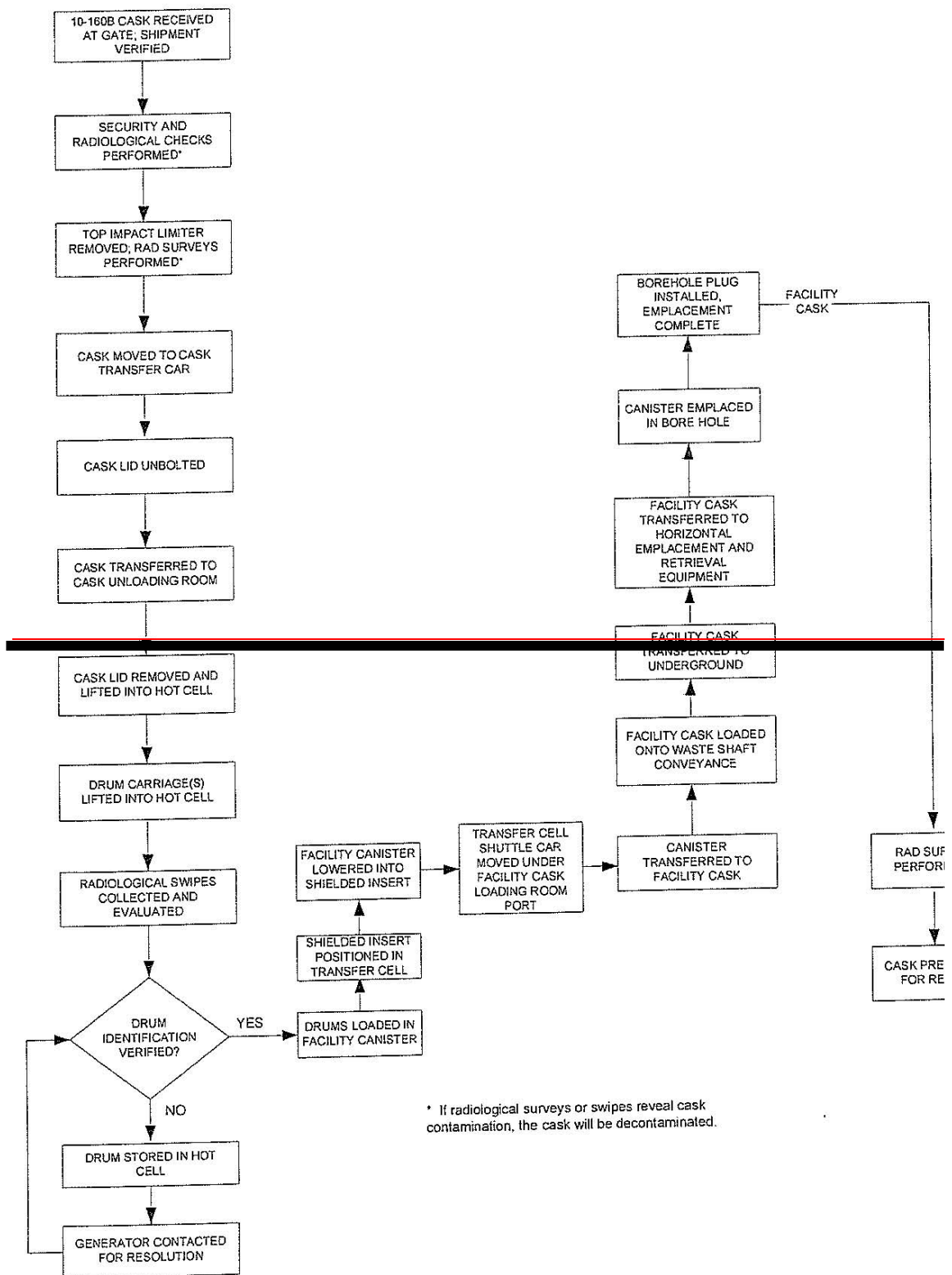
**Figure A1-25**  
**CNS 10-160B Drum Carriage**

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment A1  
 December 2018/December 2022 Renewal Draft Permit

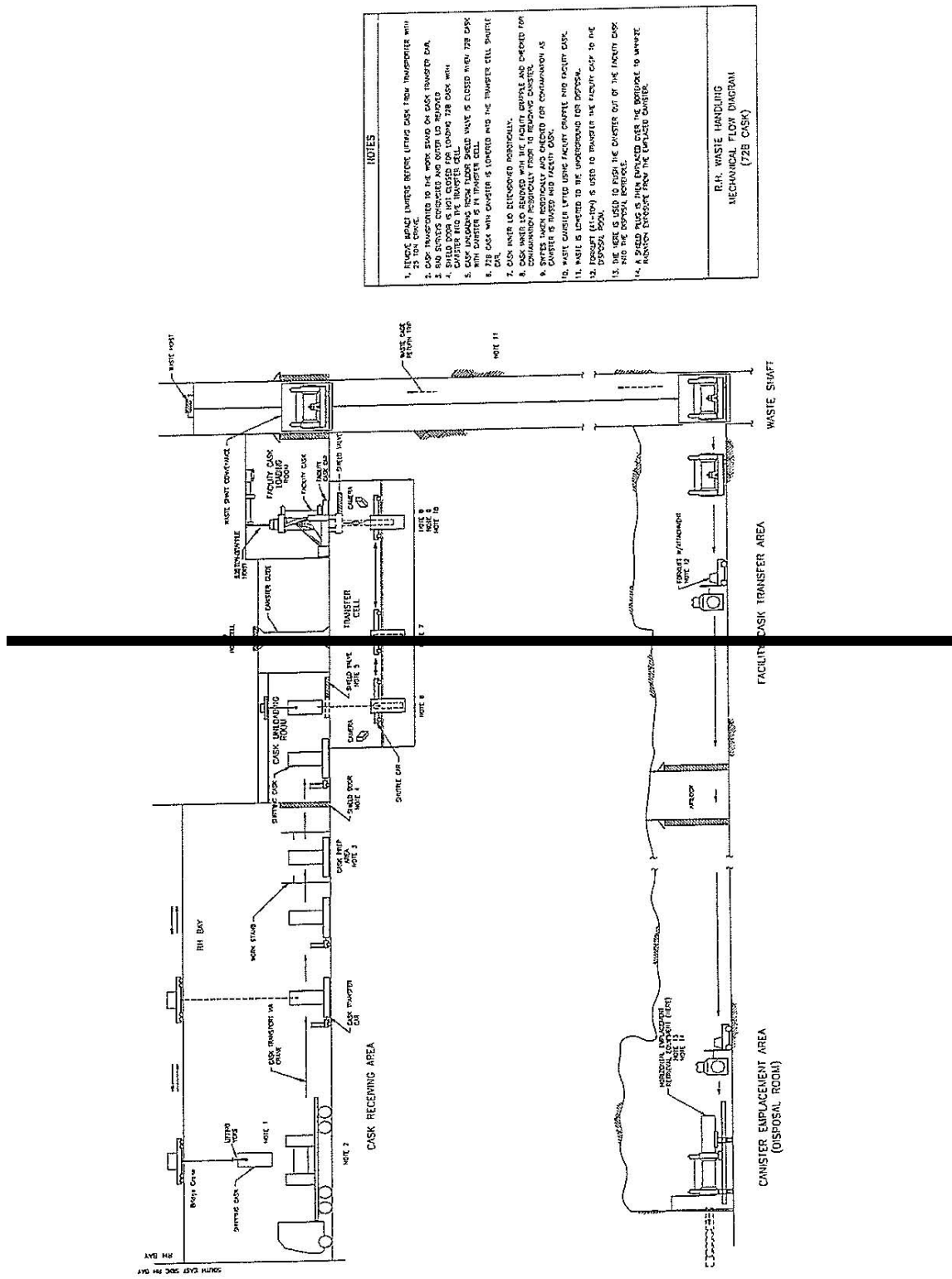


\* If radiological surveys or swipes reveal cask contamination, the cask will be decontaminated.

**Figure A1-26**  
**Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for RH-TRU 72-B Shipping Cask**



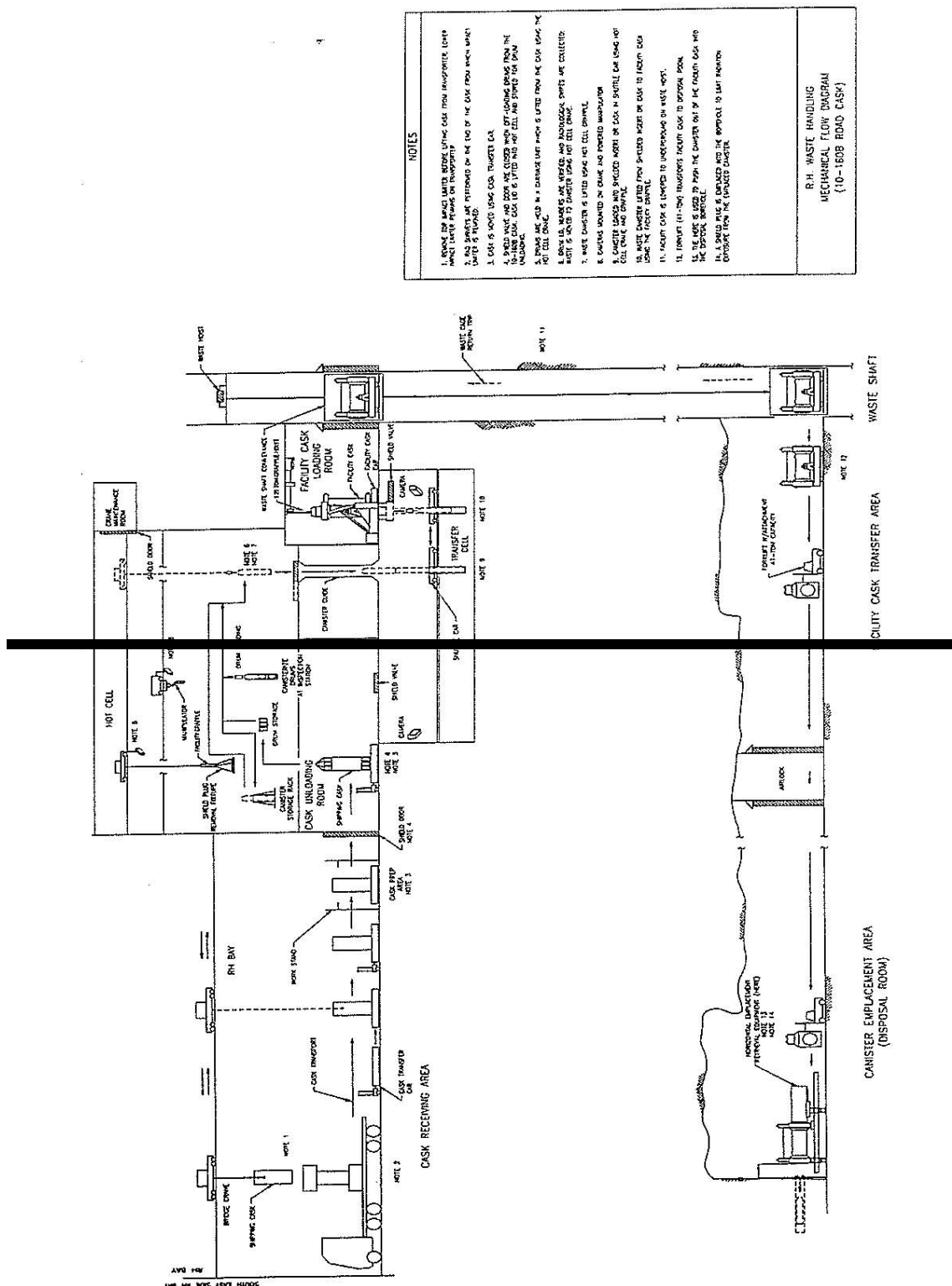
**Figure A1-27**  
**Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for CNS-10-160B Shipping Cask**



NOTES
1. REMOVE WASTE UNITS BEFORE LIFTING CASK FROM TRANSPORTER WITH 25 TON CRANE.
2. CASK TRANSPORTER TO BE WORK SHOWN ON CASK TRANSPORTER DIA.
3. WASTE UNITS TO BE TRANSPORTED FROM CASK TRANSPORTER TO CASK TRANSFER CRANE FOR LOADING 228 CASK WITH CANISTER INTO THE TRANSFER CELL.
4. CASK INCLUDING WASTE UNITS SHOWN IN THIS NOTE IS TO BE TRANSPORTED FROM CASK TRANSPORTER TO CASK TRANSFER CRANE.
5. THE CASK WITH CANISTER IS TO BE TRANSPORTED INTO THE TRANSFER CELL SHOWN IN THIS NOTE.
6. CASK WATER TO BE REMOVED WITH THE FACILITY CRANE AND CHECKED FOR CONTAMINATION. WASTE UNITS TO BE TRANSPORTED FROM CASK TRANSPORTER TO CASK TRANSFER CRANE FOR LOADING 228 CASK WITH CANISTER INTO THE TRANSFER CELL.
7. WASTE CANISTER LIFTED USING FACILITY CRANE INTO FACILITY CASK.
8. FACILITY CASK (11-100) IS USED TO TRANSPORT THE FACILITY CASK TO THE DISPOSAL ROOM.
9. THE NOTE IS USED TO PUSH THE CANISTER OUT OF THE FACILITY CASK AND INTO THE DISPOSAL ROOM.
10. WASTE UNITS TO BE TRANSPORTED FROM THE DISPOSAL ROOM TO WASTE CANISTER EMPLOYMENT AREA (DISPOSAL ROOM).

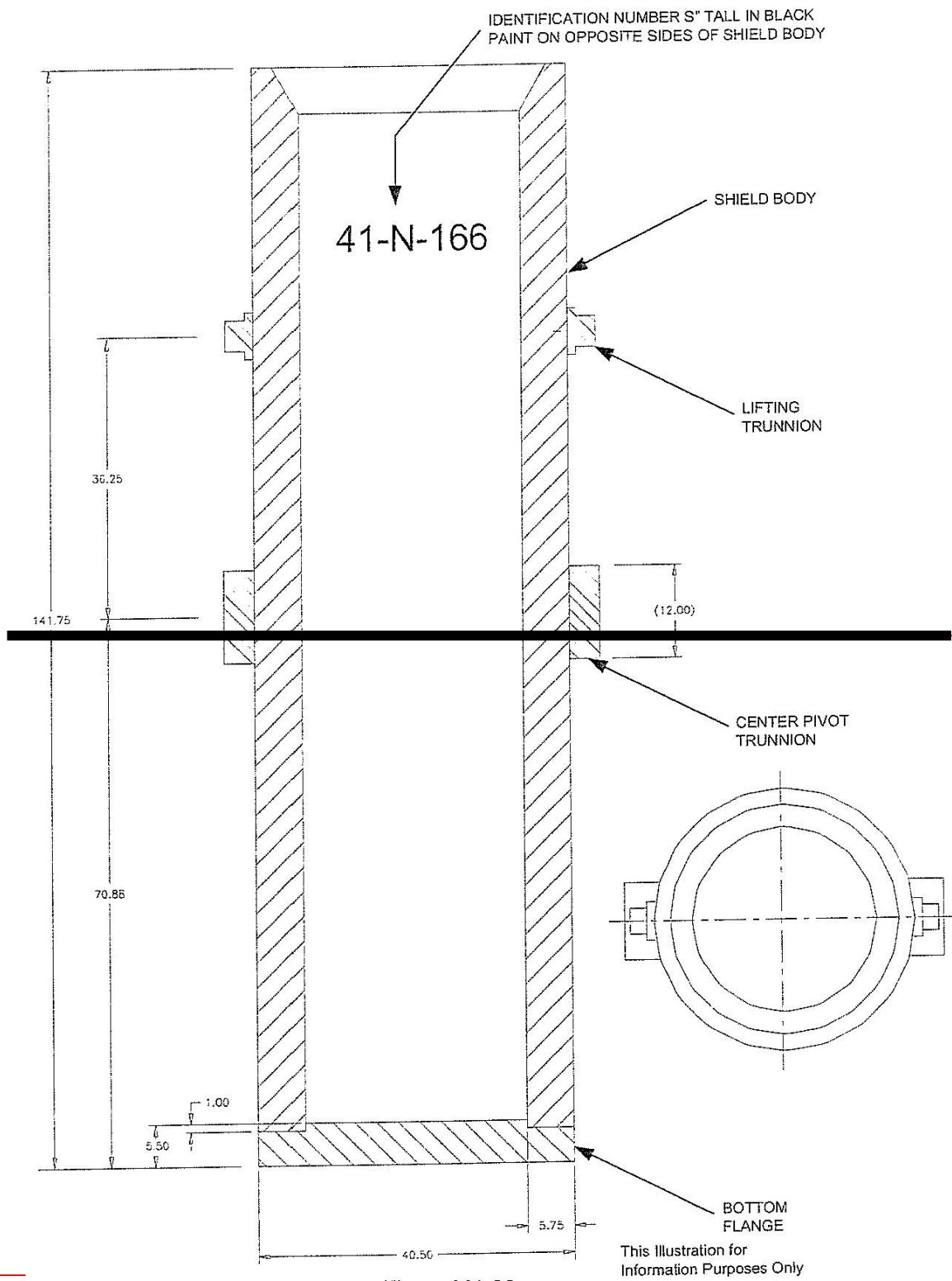
R.H. WASTE HANDLING  
 MECHANICAL FLOW DIAGRAM  
 (72B CASK)

Figure A1-28  
 Schematic of the RH Transuranic Mixed Waste Process for RH-TRU-72-B Shipping Cask

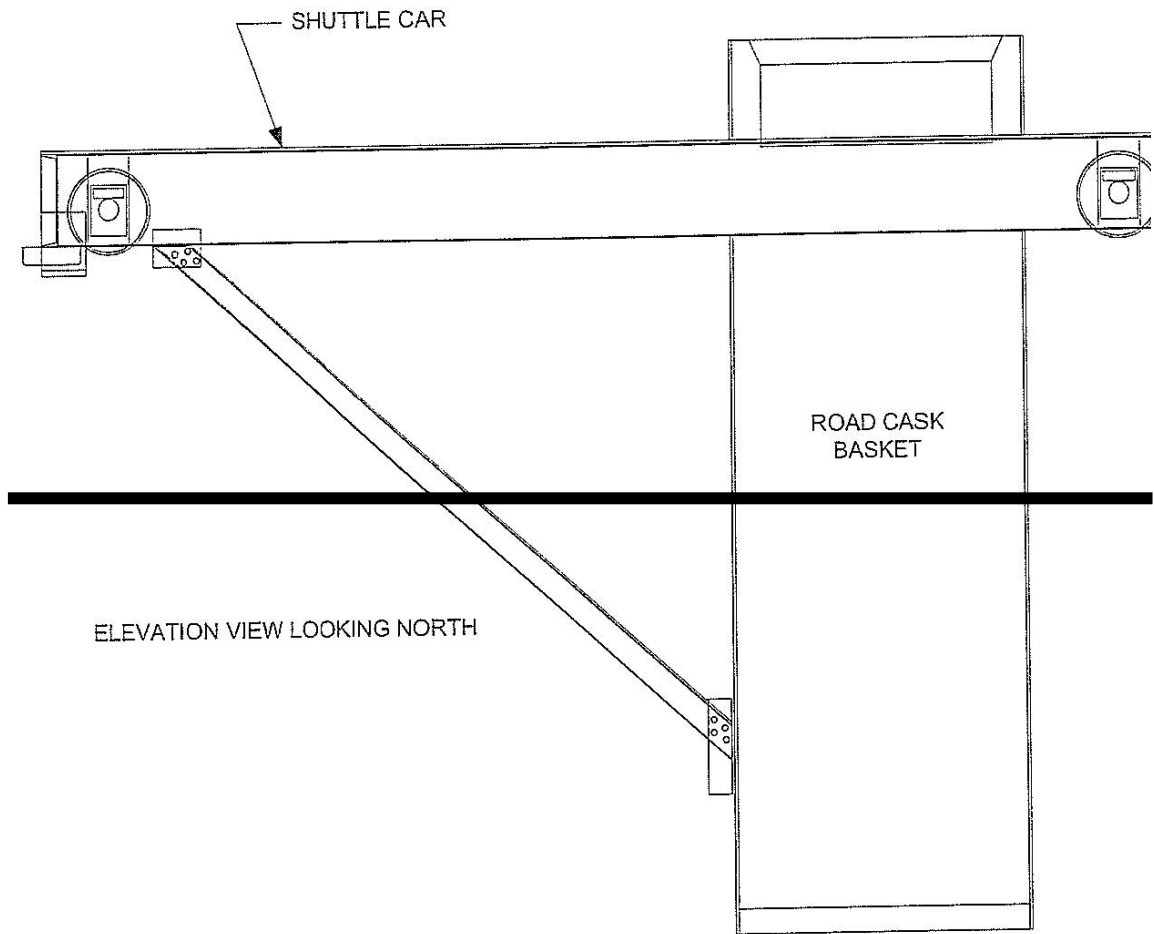


NOTES	
1. BEFORE THE WASTE IS RECEIVED INTO THE CASK FROM INSPECTION, THE WASTE MUST BE STORED IN THE CASK ROOM OR IN THE CASK ROOMS.	
2. THE WASTE IS RECEIVED IN THE CASK FROM THE WASTE SHUFT.	
3. CASK IS MOVED FROM CASK STORAGE AREA.	
4. BEFORE WASTE AND CASK ARE CLOSED, THE CASK MUST BE INSPECTED FROM THE INSIDE AND OUT. THE CASK IS LIFTED AND THE HOT CELL AND SHUFT FOR THE CASK IS CLOSED.	
5. BEFORE THE CASK IS MOVED FROM THE HOT CELL, THE CASK MUST BE INSPECTED FROM THE INSIDE AND OUT.	
6. BEFORE THE CASK IS MOVED FROM THE HOT CELL, THE CASK MUST BE INSPECTED FROM THE INSIDE AND OUT.	
7. WASTE CASK IS LIFTED FROM HOT CELL SHUFT.	
8. CASK IS MOVED FROM HOT CELL SHUFT TO CASK STORAGE AREA.	
9. CASK IS MOVED FROM CASK STORAGE AREA TO CASK LOADING ROOM.	
10. WASTE CASK IS MOVED FROM CASK LOADING ROOM TO CASK TRANSFER AREA.	
11. WASTE CASK IS MOVED FROM CASK TRANSFER AREA TO CASK STORAGE AREA.	
12. WASTE CASK IS MOVED FROM CASK STORAGE AREA TO CASK TRANSFER AREA.	
13. WASTE CASK IS MOVED FROM CASK TRANSFER AREA TO CASK STORAGE AREA.	
14. WASTE CASK IS MOVED FROM CASK STORAGE AREA TO CASK TRANSFER AREA.	
16. WASTE CASK IS MOVED FROM CASK TRANSFER AREA TO CASK STORAGE AREA.	
17. WASTE CASK IS MOVED FROM CASK STORAGE AREA TO CASK TRANSFER AREA.	

**Figure A1-29**  
**Schematic of the RH Transuranic Mixed Waste Process for CNS 10-160B Shipping Cask**



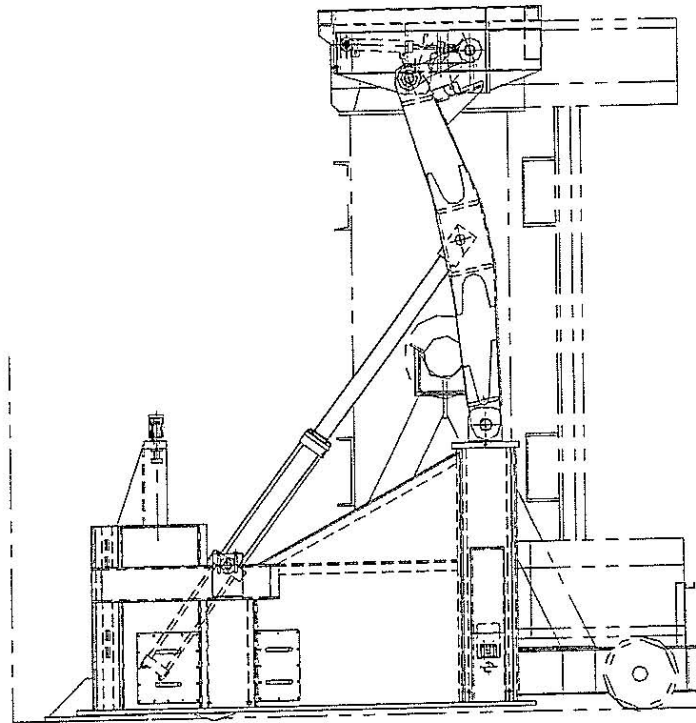
**Figure A1-30**  
**RH Shielded Insert Assembly**



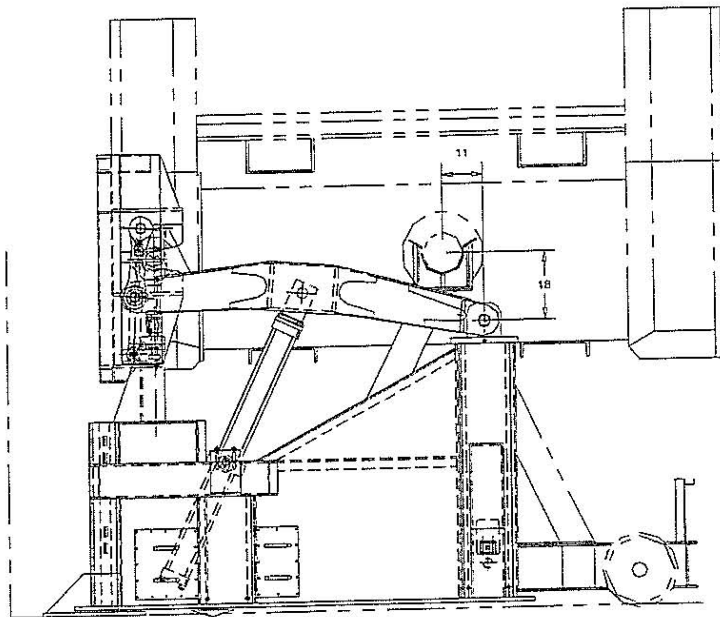
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**Figure A1-34**  
**Transfer Cell Shuttle Car**





FRONT ELEVATION  
CASK VERTICAL

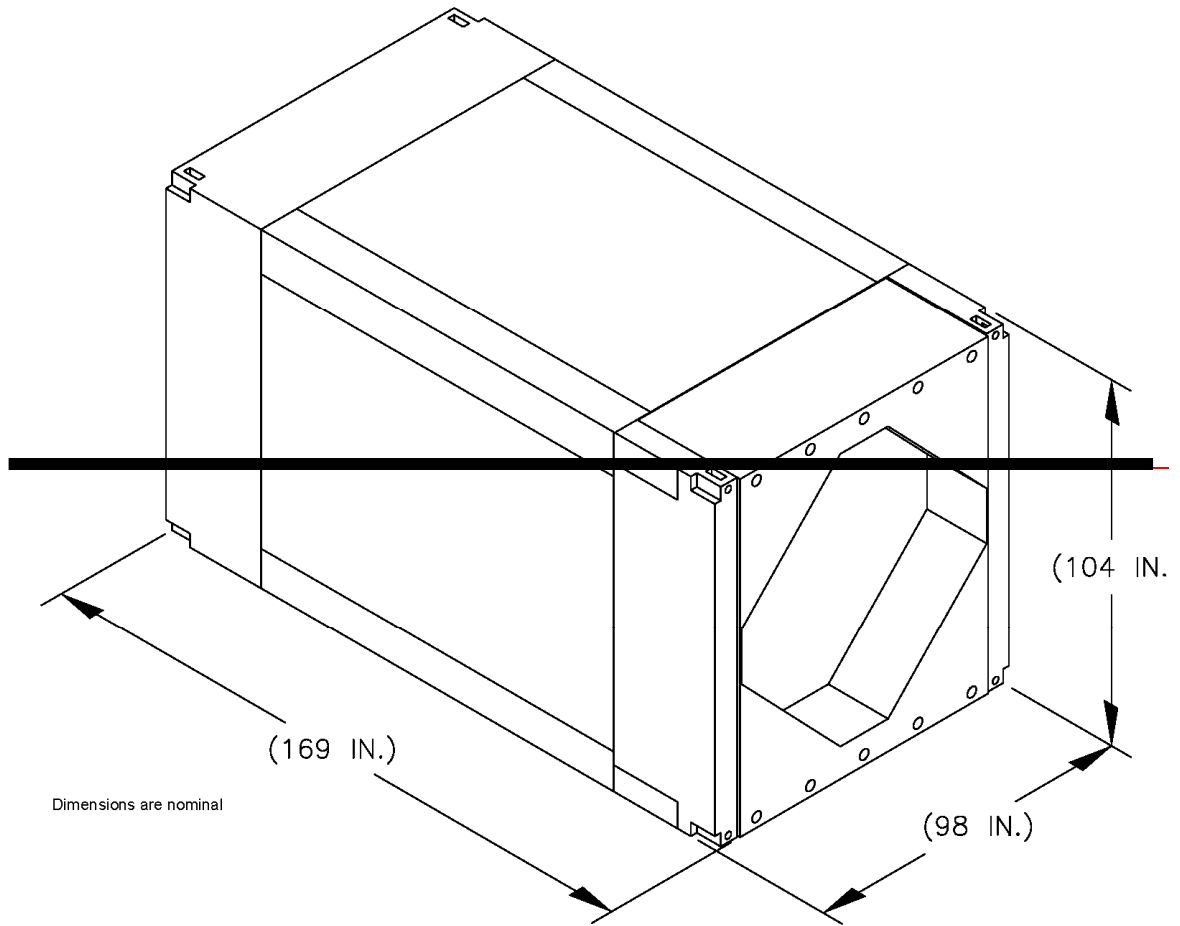


FRONT ELEVATION  
CASK HORIZONTAL

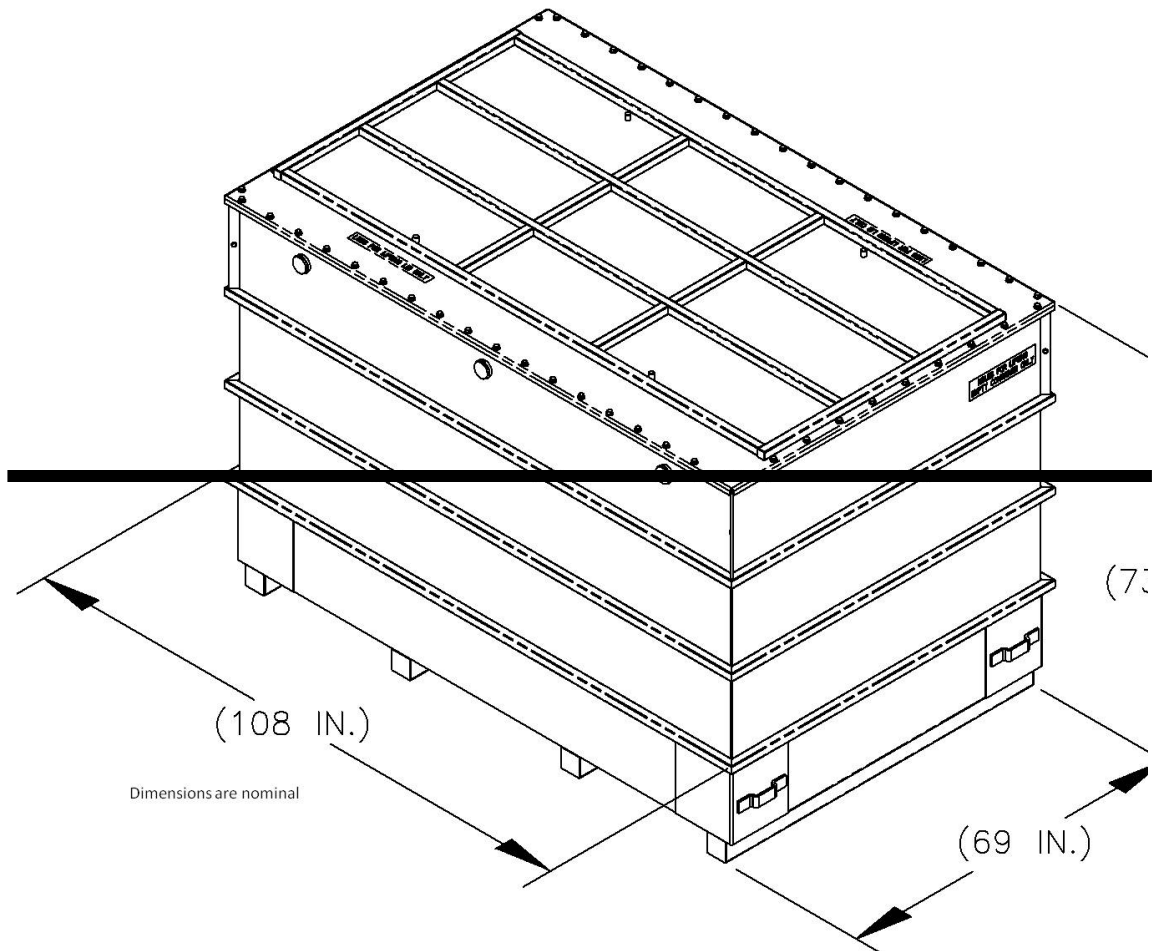
This illustration for  
Information Purposes Only

**Figure A1-32**  
**Facility Rotating Device**

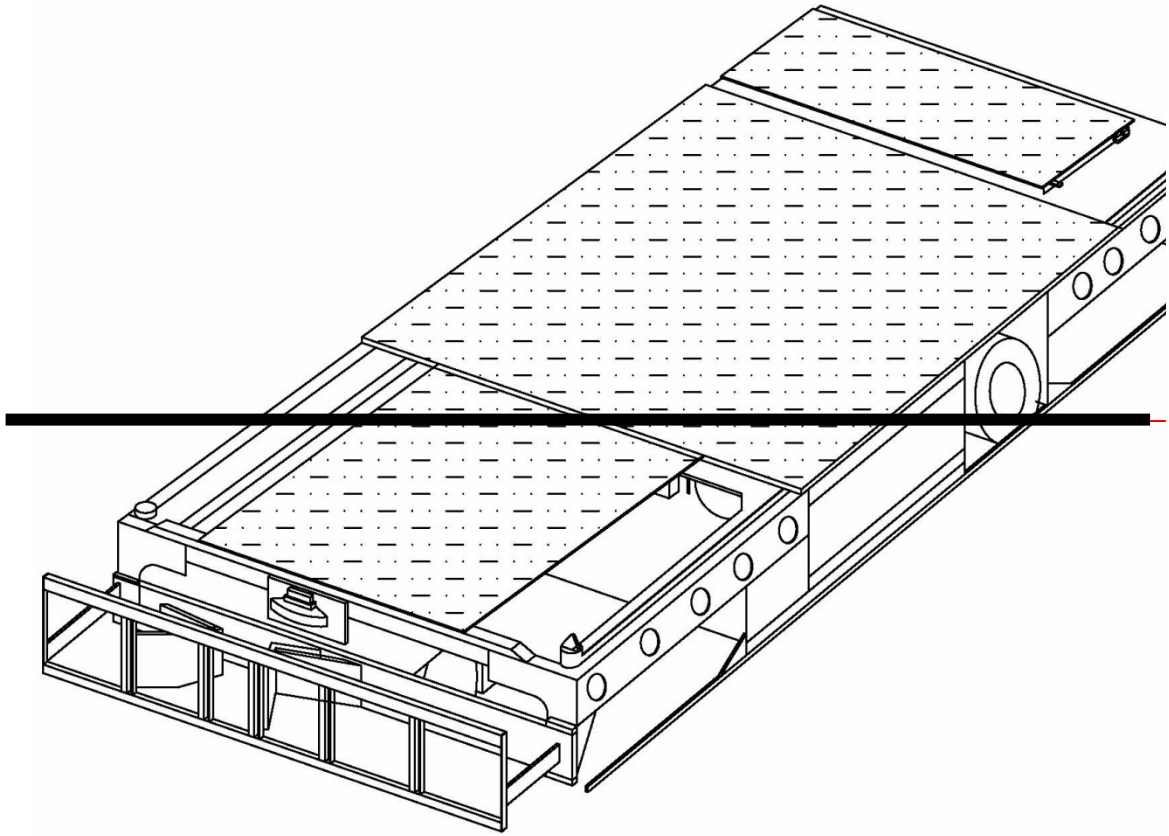




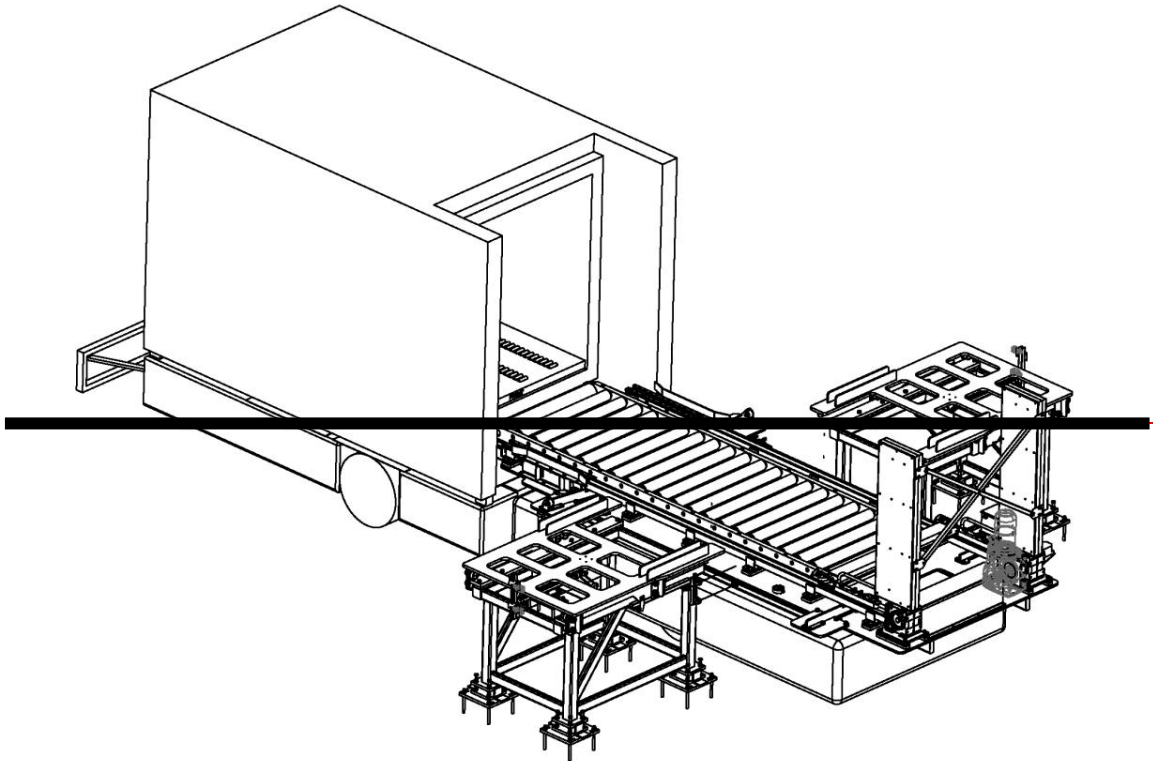
**Figure A1-33**  
**Typical TRUPACT-III**



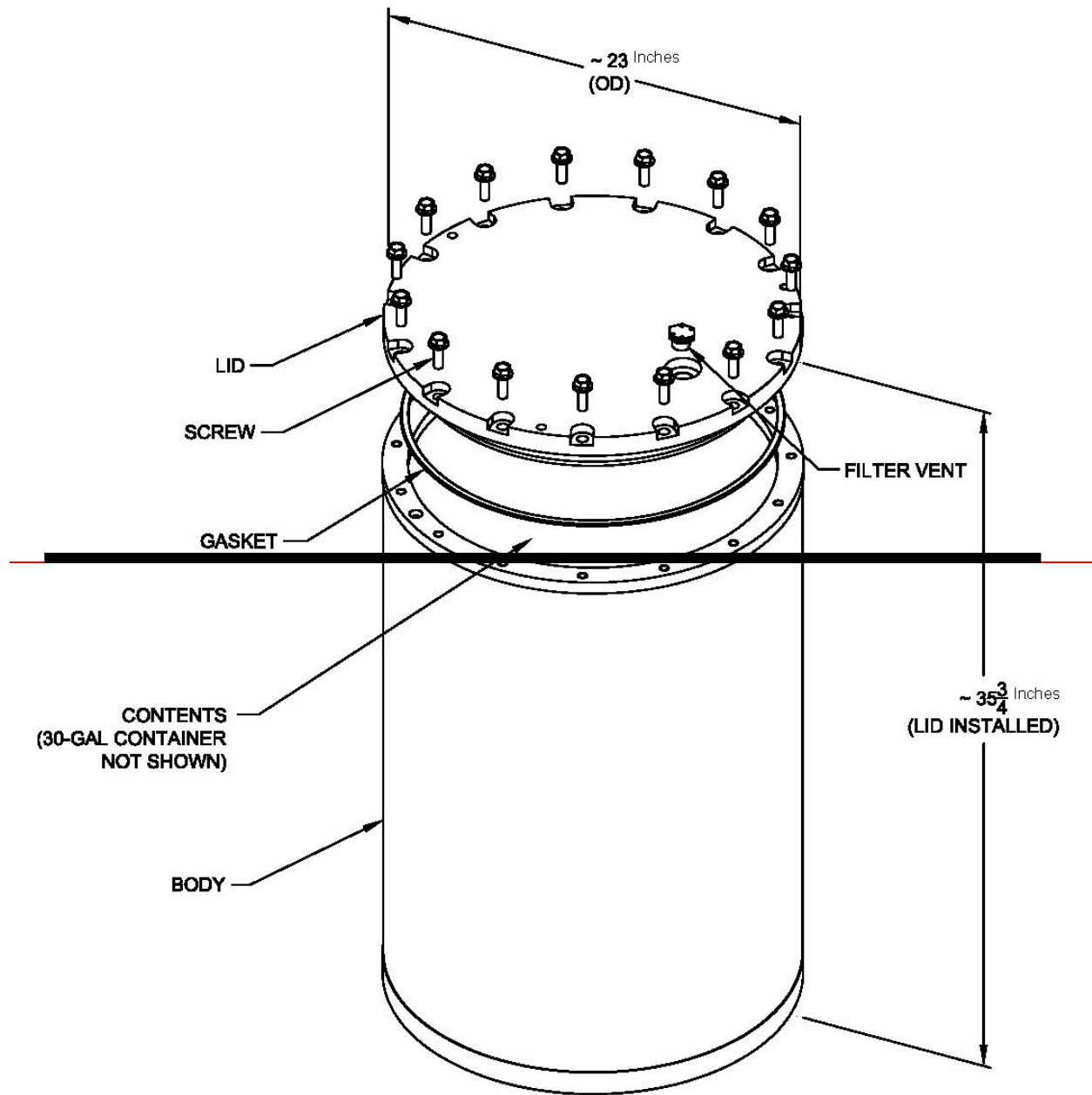
**Figure A1-34**  
**Typical Standard Large Box 2**



**Figure A1-35**  
**Typical Yard Transfer Vehicle**



**Figure A1-36**  
**Payload Transfer Station**



1  
2  
3

**Figure A1-37**  
**Typical Shielded Container**

**ATTACHMENT A2**  
**GEOLOGIC REPOSITORY**

## ATTACHMENT A2

### GEOLOGIC REPOSITORY

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### ~~LIST OF FIGURES~~

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## ATTACHMENT A2

### GEOLOGIC REPOSITORY

#### A2-1 Description of the Geologic Repository

Management, storage, and disposal of transuranic (TRU) mixed waste in the Waste Isolation Pilot Plant (WIPP) geologic repository is subject to regulation under 20.4.1.500 New Mexico Administrative Code (NMAC). The WIPP ~~is a~~ geologic repository ~~is~~ mined within a bedded salt formation, which is defined in 20.4.1.~~404-100~~ NMAC (incorporating Title 40 of the Code of Federal Regulations (CFR) §260.10) as a ~~miscellaneous~~Miscellaneous unit. As such, ~~HWMUs hazardous waste management units~~ within the repository are eligible for permitting ~~according to 20.4.1.101 NMAC (incorporating 40 CFR §260.10)~~, and are regulated under 20.4.1.500 NMAC, ~~(incorporating 40 CFR Part 264, Miscellaneous Units)~~. The underground Hazardous Waste Disposal Units (HWDUs) consist of eight currently excavated panels, known as Panels 1 through 8, and two planned panels, known as Panels 11 and 12. Each panel contains seven rooms and two access drifts. A typical disposal panel is depicted in Figure M-42.

As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601), the Permittees shall ensure that the environmental performance standards for a ~~miscellaneous~~Miscellaneous unit, which are applied to the ~~Underground~~underground Hazardous Waste Disposal Units (HWDUs) in the geologic repository, ~~will be~~are met.

The Disposal Phase will consist of receiving contact-handled (CH) and remote-handled (RH) TRU mixed waste shipping containers, unloading and transporting the waste containers to the ~~Underground~~underground HWDUs, emplacing the waste in the ~~Underground~~underground HWDUs, and subsequently achieving closure of the ~~Underground~~underground HWDUs in compliance with applicable State~~state~~ and Federal~~federal~~ regulations.

The WIPP geologic repository is mined within a ~~2,000-foot (ft) (610 meters (m)) thick~~ bedded-salt formation called the Salado Formation, which is 2,000 feet (ft) ((610 meters (m)) thick. The ~~Underground~~underground HWDUs (miscellaneous units) are located approximately 2,150 ft (655 m) beneath the ground surface. ~~TRU~~Transuranic mixed waste management activities underground will be confined to the southern portion of the 120-acre (~~48.6 hectares~~48.6 hectare) mined area and the western portion of the 29.2-acre (11.8 hectares) mined area during the Disposal Phase. During the ten-year term of this Permit, disposal of TRU mixed waste ~~will occur only~~is authorized in the HWDUs designated as Panels ~~5 through 8, 11, and 12 and in any currently active panel~~ (See ~~see~~ Figure A2-1M-43). ~~RH TRU mixed waste disposal began in Panel 4. The Permittees may also request in the future a Permit to allow disposal of containers of TRU mixed waste in the areas designated as Panels 9 and 10 in Figure A2-1. This Permit, during its 10-year term, authorizes the excavation of Panels 6 through 10 and the disposal of waste in Panels 1 through 8. Panel 9 encompassed the four drifts that extended from the southernmost drift of Panels 4 and 5 to the northernmost drift of Panels 3 and 6 and has been closed, effectively also closing Panels 3, 4, 5, and 6. In the future, the Permittees may request Permit modifications to allow disposal of TRU mixed waste in other areas of the underground, one of which may be Panel 10, which encompasses the four drifts running from the point of closure of Panel 9 to the northernmost drift of Panels 1 and 8.~~

Panels 1 through 8, 11, and 12 will consist of seven rooms and two access drifts each. ~~Panels 9 and 10 have yet to be designed.~~ Access drifts connect the rooms and have the same cross

1 section (see Section A2-2a(3)). The closure system installed ~~in-for~~ each HWDU, after it is filled,  
2 will prevent anyone from entering the HWDU and will restrict ventilation airflow. The point of  
3 compliance for air emissions from the ~~Underground-underground~~ is defined in Permit  
4 Attachment N (Volatile Organic Compound Monitoring Plan). The point of compliance is the  
5 location where the concentration of volatile organic compounds (VOCs) in the air emissions  
6 from the ~~Underground-underground~~ HWDUs will be measured and then compared to the VOC  
7 action levels ( $10^{-5}$  for carcinogens and ~~H~~Hazard Index>1 for non-carcinogens) as required by  
8 Permit Part 4, Section 4.6.2.3.

#### 9 Description of Four-Shaft Configuration

10 Four shafts connect the underground area with the surface. The Waste Shaft Conveyance  
11 headframe and hoist are located within the Waste Handling Building (WHB) and ~~will beare~~  
12 to transport containers of TRU mixed waste, equipment, and materials to the repository horizon.  
13 The ~~waste-Waste hoist-Hoist~~ can also be used to transport personnel. The Air Intake Shaft and  
14 the Salt Handling Shaft provide ventilation to all areas of the mine except for the Waste Shaft  
15 Station. This area is ventilated by the Waste Shaft itself. The Salt Handling Shaft is also used to  
16 hoist mined salt to the surface and serves as the principal personnel transport shaft. The  
17 Exhaust Shaft serves as a common exhaust air duct (air pathway) for ~~all-areas-of~~ the mine. In  
18 some cases (such as during mining activities), the Salt Handling Shaft ~~will beis~~ used as an  
19 unfiltered exhaust shaft. The Salt ~~Handling~~ Shaft exhaust air ~~will comecomes~~ from the North or  
20 Construction Circuits (i.e., areas of the underground that are not contaminated and do not need  
21 High-Efficiency Particulate Air (HEPA) filtration). The relationship between the WIPP surface  
22 facility, the four shafts, and the geologic repository horizon is shown on Figure ~~A2-2M-44~~.

#### 23 Description of Five-Shaft Configuration (with Shaft #5)

24 A fifth shaft, Shaft #5 (**S#5**), also connects the underground facility with the surface. The  
25 relationship between the WIPP surface facility, the five shafts, and the underground facility  
26 horizon is shown in Figure A2-2-S#5. With S#5 in use, the configuration of the shafts is as  
27 follows:

- 28 • Shaft #5 provides the majority of the intake air for the underground facility.
- 29 • The Air Intake Shaft provides the exhaust air pathway for the construction area of the  
30 underground facility.
- 31 • The Waste Shaft Conveyance headframe and hoist are located within the WHB and are  
32 used to transport containers of TRU mixed waste, equipment, and materials to the  
33 repository horizon. The waste hoist can also be used to transport personnel.
- 34 • The Waste Shaft provides intake air for the Waste Shaft Station.
- 35 • The Salt Handling Shaft provides a portion of the ventilation for the north area of the  
36 underground facility and is also used to hoist mined salt to the surface and serve as the  
37 principle personnel transport shaft.
- 38 • The Exhaust Shaft serves as a common exhaust air pathway for the north, disposal, and  
39 Waste Shaft Station areas of the underground facility.
- 40 • The Exhaust Shaft serves as a common exhaust air pathway for the north, disposal, and  
41 Waste Shaft Station areas of the underground facility.
- 42 • The Exhaust Shaft serves as a common exhaust air pathway for the north, disposal, and  
43 Waste Shaft Station areas of the underground facility.

1 The HWDUs identified as Panels 1 through 8, 11, and 12 (Figure ~~A2-4M-43~~) provide room for  
2 up to ~~5,244,900~~6,569,200 cubic feet (ft<sup>3</sup>) (~~148,500~~186,000 cubic meters (m<sup>3</sup>)) of CH TRU mixed  
3 waste. The CH TRU mixed waste containers may be stacked up to three high across the width  
4 of the room.

5 Panels 4 through 8, 11, and 12 provide room for up to ~~93,050~~138,950 ft<sup>3</sup> (~~2,635~~3,935 m<sup>3</sup>) of RH  
6 TRU mixed waste. ~~RH Remote-handled~~ TRU mixed waste may be disposed of in up to 730  
7 boreholes per panel, subject to the limitations in Permit Part 4, Section 4.1.1.2.ii. These  
8 boreholes ~~shall be~~ drilled on nominal eight-foot centers, horizontally, about mid-height in the  
9 ribs of a disposal room. The thermal loading from RH TRU mixed waste shall not exceed 10  
10 kilowatts per acre when averaged over the area of a panel, ~~as shown in Permit Attachment A3,~~  
11 plus 100 feet of each of a Panel's panel's adjoining barrier pillars for Panels 4 through 8, and  
12 150 feet of each of a Panel's panel's adjoining barrier pillars for Panels 11 and 12.

13 The WIPP facility is located in a sparsely populated area with site conditions favorable to  
14 isolation of TRU mixed waste from the biosphere. Geologic and hydrologic characteristics of the  
15 site related to its TRU mixed waste isolation capabilities are discussed in Addendum L1 of the  
16 WIPP Hazardous Waste Facility Permit ~~Amended-Renewal Applications~~ (DOE, 2009, 2020).  
17 ~~Hazard prevention programs are described in this Permit Attachment.~~ Contingency and  
18 emergency response actions to minimize impacts of unanticipated events, such as  
19 spills/releases of TRU mixed waste, are described in Permit Attachment D. The closure plan for  
20 the WIPP facility is described in Permit Attachment G.

## 21 A2-2 Geologic Repository Design and Process Description

### 22 A2-2a Geologic Repository Design and Construction

23 Compliance with the Permit ensures operations at the WIPP facility are, when operated in  
24 compliance with the Permit, will ensure safe operations and be protective of human health and  
25 the environment.

26 As a part of the design validation process, geomechanical tests were conducted in SPDV-Site  
27 and Preliminary Design Validation test rooms. During the tests, salt creep rates were measured.  
28 Separation of bedding planes and fracturing were also observed. Consequently, a ground-  
29 control strategy was implemented. The ground-control program at the WIPP facility mitigates the  
30 potential for roof or rib falls and maintains normal excavation dimensions, as long as access to  
31 the excavation is possible.

#### 32 A2-2a(1) CH TRU Mixed Waste Handling Equipment

33 The following are the major pieces of equipment used to manage CH TRU waste in the geologic  
34 repository. A summary of equipment capacities, as required by 20.4.1.500 NMAC is included in  
35 Table A2-1.

#### 36 Facility Pallets

37 The facility pallet is a fabricated steel unit designed to support ~~7~~seven-packs, ~~3~~three-packs, or  
38 ~~4~~four-packs of drums, standard waste boxes (SWBs), ten-drum overpacks (TDOPs), or a  
39 standard large box 2 (SLB2), ~~and has a rated load of 25,000 pounds (lbs.) (11,430 kilograms~~  
40 ~~(kg)).~~ The facility pallet will accommodates up to four seven-packs, four three-packs, or four

1 ~~four-packs of drums;~~ two ~~three-~~packs of shielded containers; ~~four 4-packs of drums;~~ four  
2 SWBs (in two stacks of two units); ~~two TDOPs;~~ or one SLB2. Loads are secured to the facility  
3 pallet during transport to the emplacement area. Facility pallets are shown in Figure ~~A2-3M-21~~.  
4 Fork pockets in the side of the pallet allow the facility pallet to be lifted and transferred by forklift  
5 to prevent direct contact between TRU mixed waste containers and forklift tines. This  
6 arrangement reduces the potential for puncture accidents. WIPP facility operational documents  
7 define the operational load of the facility pallet to ensure that the rated load of a facility pallet is  
8 not exceeded.

### 9 Backfill

10 Magnesium oxide (**MgO**) ~~will be~~ used as a backfill ~~in order~~ to provide chemical control over the  
11 solubility of radionuclides in order to comply with the requirements of 40 CFR §191.13. The  
12 MgO backfill ~~will be~~ purchased prepackaged packaged appropriately in the proper containers  
13 for emplacement in the underground. ~~Purchasing prepackaged backfill eliminates handling and~~  
14 ~~placement problems associated with bulk materials, such as dust creation. In addition,~~  
15 ~~prepackaged materials will be easier to emplace, thus reducing potential worker exposure to~~  
16 ~~radiation. Magnesium oxide is benign; therefore, S~~hould a backfill ~~container package~~ be  
17 breached, ~~MgO is benign and cleanup is simple. N~~o hazardous waste would result from a spill  
18 of backfill.

19 ~~The MgO backfill will be managed in accordance with Specification D-0101 (MgO Backfill~~  
20 ~~Specification) and WP05-WH1025 (CH Waste Downloading and Emplacement). These~~  
21 ~~documents are kept on file at the WIPP facility by the Permittees.~~

22 ~~Backfill will be handled in accordance with standard operating procedures.~~ Typical backfill  
23 emplacement configurations are shown in Figures ~~A2-5 and A2-5a~~M-45. Some emplacement  
24 configurations may include the use of MgO emplacement racks, as shown in Figure ~~A2-5a~~M-45.  
25 The backfill emplacement process does not require additional operational considerations (e.g.,  
26 ventilation flow and control) beyond those required for TRU mixed waste emplacement.

27 ~~Quality control will be provided within standard operating procedures to record that the correct~~  
28 ~~number of sacks are placed and that the condition of the sacks is acceptable.~~

29 ~~Backfill placed in this manner is protected until exposed when sacks are broken during creep~~  
30 ~~closure of the room and compaction of the backfill and waste. Backfill in sacks utilizes existing~~  
31 ~~techniques and equipment and eliminates operational problems such as dust creation and~~  
32 ~~introducing additional equipment and operations into waste handling areas. There are no mine~~  
33 ~~operational considerations (e.g. ventilation flow and control) when backfill is placed in this~~  
34 ~~manner.~~

### 35 The Waste Shaft Conveyance

36 The hoist systems in the shafts and all-related shaft furnishings are designed to resist the  
37 dynamic forces of the hoisting system and to withstand a design-basis earthquake (DBE) of 0.1  
38 g peak ground acceleration. Appendix D2 of the WIPP RCRA Part B Permit Application (DOE,  
39 1997) provided an engineering design-basis earthquake report, which provides the basis for  
40 seismic design of WIPP facility structures. The ~~waste~~ Waste hoist ~~Hoist~~ is equipped with a  
41 control system that ~~will~~ detects malfunctions or abnormal operations of the hoist system (such

1 as overtravel, overspeed, power loss, circuitry failure, or starting in a wrong direction) and ~~will~~  
2 triggers an alarm that automatically shuts down the hoist.

3 The ~~waste-Waste hoist-Hoist~~ moves the Waste Shaft Conveyance and is a multirope, friction-  
4 type hoist. A counterweight is used to balance the ~~waste-Waste shaft-Shaft~~  
5 ~~conveyance-Conveyance~~. The ~~waste-Waste shaft-Shaft conveyance-Conveyance~~ (outside  
6 dimensions) is 30 ft (9 m) high by 10 ft (3 m) wide by 15 ft (4.5 m) deep and can carry a payload  
7 of 45 tons (40,824 kilograms (kg)). During loading and unloading operations, it is steadied by  
8 fixed guides. The hoist's maximum rope speed is 500 ft (152.4 m) per minute.

9 The Waste Shaft hoist system has two sets of brakes, with two units per set, plus a motor that is  
10 normally used to stop the hoist. The brakes are designed so that either set of brakes, acting  
11 alone, can stop a fully loaded conveyance under all-emergency conditions.

## 12 The Underground Waste Transporter

13 The underground waste transporter is a commercially available diesel-powered tractor. The  
14 trailer was designed specifically for the WIPP facility for transporting facility pallets from the  
15 ~~waste-Waste shaft-Shaft conveyance-Conveyance~~ to the ~~Underground-underground~~ HWDU in  
16 use. This transporter is shown in Figure A2-6M-46.

## 17 Underground Forklifts

18 ~~CH-Contact-handled~~ TRU mixed waste containers loaded on slipsheets will be removed from  
19 the facility pallets using forklifts with a push-pull attachment (Figure A2-7M-47) attached to the  
20 forklift-truck front carriage. The push-pull attachment grips the edge of the slipsheet (on which  
21 the waste containers sit) to pull the containers onto the platen. After the forklift moves the waste  
22 containers to the emplacement location, the push-pull attachment pushes the containers into  
23 position. The use of the push-pull attachment prevents direct contact between waste containers  
24 and forklift tines. ~~SWBs-Standard waste boxes~~ and TDOPs may also be removed from the  
25 facility pallet by using forklifts equipped with special adapters for these containers. These  
26 special adapters will prevent direct contact between SWBs or TDOPs and forklift tines. In  
27 addition, the low clearance forklift that is used to emplace MgO may be used to emplace waste  
28 if necessary.

29 A forklift will be used to offload the SLB2 from the underground transporter and emplace the  
30 waste container in the waste stack.

## 31 A2-2a(2) Shafts

### 32 Four-Shaft Configuration

33 The WIPP facility uses four shafts: the Waste Shaft, the Salt Handling Shaft, the Air Intake  
34 Shaft, and the Exhaust Shaft. These shafts are vertical openings that extend from the surface to  
35 the repository level.

36 The Waste Shaft is located beneath the WHB and is-varies from 19 to 20 ft (5.8 to 6.1 m) in  
37 diameter. The Salt Handling Shaft, located north of the Waste Shaft beneath the salt handling  
38 headframe, is-varies from 10 to 12 ft (3 to 3.6 m) in diameter. Salt mined from the repository  
39 horizon is removed through the Salt Handling Shaft. The Salt Handling Shaft is the main

1 personnel and materials hoist and also serves as a secondary supply air pathway for the  
2 underground areas. The Air Intake Shaft, northwest of the WHB, varies in diameter from 16 ft 7  
3 ~~in-inches (in)~~ (4.51 m) to 20 ft 3 in. (6.19 m) and is the primary source of fresh air underground.  
4 The Exhaust Shaft, east of the WHB, ~~is-varies from~~ 14 to 15 ft (4.3 to 4.6 m) in diameter and  
5 serves as the exhaust air pathway for the underground air. In some cases, the Salt Handling  
6 Shaft may be used as an unfiltered exhaust shaft to ventilate areas of the underground that do  
7 not need filtration.

#### 8 Five-Shaft Configuration (with S#5)

9 A fifth shaft, S#5, also extends from the surface to the repository level. The inside diameter of  
10 S#5 is approximately 26 ft (8 m). With S#5 in use, it is the primary source of fresh air to the  
11 underground facility. With S#5 in use, the ventilation functions of the existing shafts are as  
12 follows:

- 13 • Salt Handling Shaft serves as a secondary supply-air (intake air) pathway for the  
14 underground facility.
- 15
- 16 • The Waste Shaft serves as the supply-air (intake air) pathway for the Waste Shaft  
17 Station.
- 18
- 19
- 20 • The Air Intake Shaft serves as the exhaust air pathway for the construction area of the  
21 underground facility.
- 22
- 23 • The Exhaust Shaft serves as the exhaust air pathway for the north, disposal and Waste  
24 Shaft Station areas of the underground facility.

#### 25 General Shaft Description

26 Openings excavated in salt experience closure because of salt creep, (or time-dependent  
27 deformation at constant load). The closure affects the design of ~~all of~~ the openings discussed in  
28 this section. Underground excavation dimensions, therefore, are nominal, because they change  
29 with time. The unlined portions of the shafts have larger diameters than the lined portions, which  
30 allows for closure caused by salt creep. Each shaft includes a shaft collar, a shaft lining, and a  
31 shaft key section. ~~Permit Attachment G2 describes each shaft in detail including shaft  
32 construction, location of the shaft liners, shaft keys, water collection rings, and tubes. The Final  
33 Design Validation Report in Appendix D1 of the WIPP RCRA Part B Permit Application (DOE,  
34 1997) discusses the original four shafts and shaft components in greater detail.~~

~~The reinforced concrete shaft collars extend from the surface to the top of the underlying  
35 consolidated sediments. Each collar serves to retain adjacent unconsolidated sands and soils  
36 and to prevent surface runoff from entering the shafts. The shaft linings extend from the base of  
37 the collar to the top of the salt beds approximately 850 ft (259 m) below the surface. Grout  
38 injected behind the shaft lining or a polymeric spray coating retards water seeping into the  
39 shafts from water-bearing formations, and the liner is designed to withstand the natural water  
40 pressure associated with these formations. The shaft liners are concrete, except in the Salt  
41 Handling Shaft, where a steel shaft liner has been grouted in place.  
42~~



1 ~~The shaft key is a circular reinforced concrete section emplaced in each shaft below the liner in~~  
2 ~~the base of the Rustler and extending about 50 ft (15 m) into the Salado. The key functions to~~  
3 ~~resist lateral pressures and assures that the liner will not separate from the host rocks or fail~~  
4 ~~under tension. This design feature also aids in preventing the shaft from becoming a route for~~  
5 ~~groundwater flow into the underground facility.~~

6 ~~On the inside surface of each shaft, excluding the Salt Handling Shaft and S#5, there are three~~  
7 ~~water collection rings: one just below the Magenta, one just below the Culebra, and one at the~~  
8 ~~lowermost part of the key section. These collection rings will collect water that may seep into the~~  
9 ~~shaft through the liner. The Salt Handling Shaft has a single water collection ring in the lower~~  
10 ~~part of the key section. Water collection rings are drained by tubes to the base of the shafts~~  
11 ~~where the water is accumulated. Shaft #5 is outfitted with water stops at each shaft liner cold~~  
12 ~~joint throughout the lined portion of the shaft.~~

13 ~~WIPP~~sShafts and other underground facilities are, for all practical purposes, dry. Minor  
14 quantities of water (which accumulate in some shaft sumps) are insufficient to affect the waste  
15 disposal area. This water is collected, brought to the surface, and disposed of in accordance  
16 with current standards and regulations.

17 The Waste Shaft is protected from precipitation by the roof of the ~~waste~~Waste shaft Shaft  
18 ~~conveyance~~Conveyance headframe tower. The Exhaust Shaft is configured at the top with a 14  
19 ft- (4.3 m-) diameter duct that diverts air into the exhaust filtration system or to the atmosphere,  
20 as appropriate. The Salt Handling and Air Intake Shaft collars are open except for the  
21 headframes. Rainfall into the shafts is evaporated by ventilation air. Shaft #5 is covered to direct  
22 intake air into the underground facility using fans located on the surface. The fans are  
23 connected to the shaft via ducting and a plenum.

24 With S#5 in use, the Air Intake Shaft is converted to an exhaust shaft for Construction Circuit air  
25 by routing the air through a plenum and ducting to an unfiltered exhaust stack.

26 The ~~waste~~Waste hoist Hoist system in the Waste Shaft and ~~all~~Waste Shaft furnishings are  
27 designed to resist the dynamic forces of the hoisting system, which are greater than the seismic  
28 forces on the underground facilities. In addition, the Waste Shaft ~~conveyance~~Conveyance  
29 headframe is designed to withstand the ~~design-basis earthquake (DBE)~~DBE. Maximum  
30 operating speed of the hoist is 500 ft (152.4 m) per minute. During loading and unloading  
31 operations, the ~~waste~~Waste hoist Hoist is steadied by fixed guides. The ~~waste~~Waste hoist  
32 Hoist is equipped with a control system that will detect malfunctions or abnormal operations of  
33 the hoist system, such as overtravel, overspeed, power loss, or circuitry failure. The control  
34 response is to annunciate the condition and shut the hoist down. Operator response is required  
35 to recover from the automatic shutdown. Waste ~~hoist~~Hoist operation is continuously monitored  
36 by the Central Monitoring System (CMS). A battery-powered ~~FM~~transmitter/receiver allows  
37 communication between the ~~hoist-conveyance~~Waste Shaft ConveyanceConveyance and the  
38 hoist house.

39 The ~~waste~~Waste hoist Hoist has two pairs of brake calipers acting on independent brake paths.  
40 The hoist motor is normally used for braking action of the hoist. The brakes are used to hold the  
41 hoist in position during normal operations and to stop the hoist under emergency conditions.  
42 Each pair of brake calipers is capable of holding the hoist in position during normal operating  
43 conditions and stopping the hoist under emergency conditions. In the event of power failure, the  
44 brakes will set automatically.

1 The ~~waste~~Waste hoist~~Hoist~~ is protected by a fixed automatic fire suppression system. Portable  
2 fire extinguishers are also provided on the hoist floor and in equipment areas.

### 3 A2-2a(3) Subsurface Structures

4 The subsurface structures in the repository, located at 2,150 ft (655 m) below the surface,  
5 include the HWDUs, the northern experimental areas, and the support areas. Appendix D3 of  
6 the WIPP RCRA Part B Permit Application (DOE, 1997) provided details of the underground  
7 layout. Figure A2-8M-48 shows the proposed waste emplacement configuration for the HWDUs.

8 The status of important-designated underground equipment, including fixed fire-protection  
9 systems, the ventilation system, and contamination-detection systems, ~~will be~~are monitored by  
10 ~~a the~~the central monitoring system~~CMS~~, located in the Support Building adjacent to the WHB.  
11 Backup power will be provided as discussed below. The subsurface support areas are  
12 constructed and maintained to conform to ~~Federal~~federal mine safety codes.

### 13 Underground Hazardous Waste Disposal Units (HWDUs)

14 During the terms of this and the preceding Permit, the final TRU mixed waste volumes  
15 emplaced in the repository will not exceed the maximum capacities listed in Permit Part 4, Table  
16 4.1.1 for each HWDU. ~~CH~~Contact-handled TRU mixed waste will be disposed of in  
17 ~~Underground-underground~~ HWDUs identified as Panels 1 through 8, 11, and 12. ~~RH~~Remote-  
18 handled TRU mixed waste may be disposed of in Panels 4 through 8, 11, and 12.

19 Main entries and cross cuts in the repository provide access and ventilation to the HWDUs. The  
20 main entries link the shaft pillar/service area with the TRU mixed waste management area and  
21 are separated by pillars. Each of the ~~Underground-underground~~ HWDUs labeled Panels 1  
22 through 8, 11, and 12 will have seven rooms. The locations of these HWDUs are shown in  
23 Figure A2-4M-43. The rooms in Panels 1-7 ~~will~~will have nominal dimensions of 13 ft (4.0 m) high by  
24 33 ft (10 m) wide by 300 ft (91 m) long and ~~will be~~are ~~supported~~separated by 100 ft (30 m) wide  
25 pillars. The rooms in Panel 8 ~~will~~will have nominal dimensions of 16 ft (5.0 m) high by 33 ft (10 m)  
26 wide by 300 ft (91 m) long and ~~will be~~are ~~supported~~separated by 100 ft (30 m) wide pillars. The  
27 rooms in Panel 11 and Panel 12 will have nominal dimensions of 14 ft (4.3 m) high by 33 ft (10  
28 m) wide by 300 ft (91 m) long and will be separated by 100 ft (30 m) wide pillars.

29 As currently planned, future Permits may allow disposal of TRU mixed waste containers in ~~two~~  
30 additional panels, ~~identified as Panels 9 and one of which may be Panel 10~~ (Figure M-43).  
31 Disposal of TRU mixed waste in Panels ~~9 and 10~~ is prohibited under this Permit. ~~If TRU mixed~~  
32 ~~waste volumes disposed of in the eight panels~~Panels 1 through 8 fail to reach the stated design  
33 capacity, ~~the~~ Permittees may request a Permit modification to allow disposal of TRU mixed  
34 waste in ~~the four main entries and crosscuts adjacent to the waste panels (referred to as the~~  
35 ~~disposal area access drifts)~~. ~~These areas~~access drifts are labeled Panels ~~9 and 10 in the~~  
36 ~~future, Figure M-43~~A2-1. A permit modification or future permit modification request would be  
37 submitted describing the condition of those drifts and the controls exercised for personnel safety  
38 and environmental protection while disposing of waste in these ~~areas~~access drifts. These ~~areas~~  
39 access drifts have the following nominal dimensions:

- 40 • The E-140 waste transport route south of the Waste Shaft Station is mined to be  
41 25 ft wide nominally and its height ranges from about 14 ft to 20 ft.



- 1           • The W-30 waste transport route south of S-700 is mined to be 20 ft wide nominally  
2           and its height ~~will be is~~ mined to at least 14 ft.
- 3           • ~~All other~~Other drifts that are part of the waste transport route ~~will be are~~  
4           20 ft wide and 14 ft high to accommodate waste transport equipment.
- 5           • Other drifts (i.e. mains and cross-cuts) vary in width and height according to their  
6           function typically ranging from 14 ft to 20 ft wide and 12 ft to 20 ft high.

7 The layout of these excavations is shown on Figure ~~A2-1M-43~~.

#### 8 Underground Facilities Ventilation System

9 The underground facilities ventilation system ~~will provide~~provides a safe and suitable  
10 environment for underground operations during normal WIPP facility operations. The  
11 underground system is designed to provide control of potential airborne contaminants in the  
12 event of an accidental release or an underground fire.

13 The underground is divided into specific areas that are supported by different ventilation flows  
14 referred to as ventilation circuits. Consequently, the underground ventilation system is  
15 comprised of four separate circuits, as designated on Figure ~~A2-9aM-49~~: one serving the  
16 northern experimental areas (North Circuit), one serving the construction areas (Construction  
17 Circuit), one serving the waste disposal areas (Disposal Circuit), and one serving the ~~waste~~  
18 ~~Waste shaft~~Shaft station area (Waste Shaft Station Circuit). The ~~air from the~~ four  
19 circuits ~~are is~~ recombined near the bottom of the Exhaust Shaft, which serves as a common  
20 exhaust route from the underground level to the surface. In some cases, the Salt Handling Shaft  
21 may be used as an unfiltered exhaust shaft (Figure ~~A2-9bM-50~~) to ventilate areas of the  
22 underground that do not need filtration.

23 With S#5 in use (Figure ~~A2-9cM-51~~), the Salt Handling Shaft serves as the secondary supply-air  
24 pathway for the underground facility while S#5 serves as the primary supply-air pathway for the  
25 underground facility. The Waste Shaft supplies the intake air for the Waste Shaft Station. The  
26 Air Intake Shaft provides the exhaust route for the Construction Circuit while the Exhaust Shaft  
27 provides the exhaust route for the North, Disposal, and Waste Shaft Station Circuits.

#### 28 Underground Ventilation System Description

29 The underground ventilation system consists of centrifugal exhaust fans, two identical HEPA-  
30 filter assemblies arranged in parallel, isolation dampers, a filter bypass arrangement, two skid-  
31 mounted HEPA-filter assemblies arranged in parallel, and associated ductwork. The fans,  
32 connected by the ductwork to the underground exhaust shaft so that they can independently  
33 draw air through the Exhaust Shaft, are divided into three groups. One group consists of three  
34 main exhaust fans, two of which are utilized to provide the nominal ~~air flow~~airflow of 425,000  
35 standard ft<sup>3</sup> per minute (**scfm**) throughout the WIPP facility underground during normal  
36 (unfiltered) operation. One main fan may be operated in the alternate mode to provide 260,000  
37 scfm underground ventilation flow. These fans are located near the Exhaust Shaft. The second  
38 group consists of three filtration fans, and each can provide 60,000 scfm of ~~air flow~~airflow.  
39 These fans, located at the Exhaust Filter Building, can be operated in the filtration mode, where  
40 exhaust is diverted through HEPA filters, or in the reduced or minimum ventilation mode, where  
41 air is not drawn through the HEPA filters. The third group consists of two skid-mounted filtration

1 fans and HEPA-filter assemblies, each of which can provide approximately 23,000 scfm of ~~air~~  
2 ~~flow~~airflow. The skid-mounted filtration fan and HEPA-filter assemblies, referred to as the  
3 Interim Ventilation System (IVS) located south of the Exhaust Filter Building, are only operated  
4 in filtration mode, where exhaust is diverted through HEPA filters. In addition to the surface fans,  
5 an underground fan has been installed to ventilate ~~uncontaminated~~ areas in the North and  
6 Construction Circuits. This system is referred to as the Supplemental Ventilation System (SVS)  
7 and ~~will be~~is used in conjunction with ~~the~~ IVS (as shown in Figure ~~A2-9bM-50~~). When this fan is  
8 operating, the Salt Shaft ~~will serve~~s as an unfiltered exhaust shaft for the North and  
9 Construction Circuits. A portion of the airflow provided by the SVS to the Construction Circuit  
10 ~~can is~~ also ~~be~~ used to provide fresh air to the Disposal Circuit, ~~if needed~~. In this case, the air  
11 from the Disposal Circuit will continue to be exhausted through the HEPA filtration system.

12 When the repository is configured to use five shafts, two fans located on the surface and  
13 connected via ducting and a plenum to S#5, supply the majority of the intake air to the  
14 underground facility. One fan operates at a time, while the idle fan is available as a back-up fan.  
15 The Salt Handling Shaft serves as a secondary air intake shaft for the north area and the Waste  
16 Shaft serves as the air intake shaft for the Waste Shaft Station area of the underground facility.  
17 The Air Intake Shaft serves as an unfiltered exhaust shaft for the construction area of the  
18 underground facility. The north, disposal, and Waste Shaft Station areas of the underground  
19 facility are exhausted through the Exhaust Shaft and the associated filtration system.

20 The underground mine ventilation is designed to supply sufficient quantities of air to ~~all areas of~~  
21 the repository. During normal operating mode (simultaneous mining and waste emplacement  
22 operations), approximately 140,000 actual ft<sup>3</sup> (3,962 m<sup>3</sup>) per min can be supplied to the panel  
23 area. This quantity ~~is necessary in order to~~can support the level of activity and the pieces of  
24 diesel equipment that are expected to be in operation.

25 At any given time during waste emplacement activities, there may be significant activities in  
26 multiple rooms in a panel. For example, one room may be receiving CH TRU mixed waste  
27 containers, another room may be receiving RH TRU mixed waste canisters, and the drilling of  
28 RH TRU mixed waste emplacement boreholes may be occurring in another room. The  
29 remaining rooms in a panel will either be completely filled with waste; be idle, awaiting waste  
30 handling operations; or being prepared for waste receipt. A minimum ventilation rate of 35,000  
31 standard ft<sup>3</sup> (990 standard m<sup>3</sup>) per minute ~~will be~~is maintained in each active room when waste  
32 disposal is taking place and workers are present in the room. ~~This Based on calculations in~~  
33 ~~Appendix D9 of the RCRA Part B Permit Application (DOE, 1997), this~~ quantity of air is required  
34 ~~to support the numbers and types of diesel equipment that are expected to be in operation in~~  
35 ~~the area, and to support~~protect the underground waste handling personnel working in that  
36 ~~area~~an active disposal room. The remainder of the air is needed in order to account for air  
37 leakage through inactive rooms. ~~If an active room ventilation rate of 35,000 scfm cannot be met,~~  
38 ~~actions as described in Permit Attachment O shall be taken during waste disposal operations~~  
39 ~~when workers are present.~~

40 Air ~~will be~~is routed into a panel from the intake side. Air is routed through the individual rooms  
41 within a panel using any of the following flow control devices: underground bulkheads, brattice-  
42 cloth barricades, bulkheads with doors or air regulators. Bulkheads are constructed by erecting  
43 framing of rectangular steel tubing and screwing galvanized sheet metal to the framing.  
44 Bulkhead members use telescoping extensions that are attached to framing and the salt which  
45 adjust to creep. Flexible flashing attached to the bulkhead on one side and the salt on the other  
46 completes the ~~seal of the ventilation~~bulkhead installation. Where controlled airflow is required, a

1 louver-style damper or a slide-gate (sliding panel) regulator is installed on the bulkhead.  
2 Personnel access is available through most bulkheads, and vehicular access is possible  
3 through selected bulkheads. Vehicle ~~roll-up~~ doors in the panel areas are not equipped with  
4 warning bells or strobe lights since these doors are to be used for limited periodic maintenance  
5 activities in the return air path. Flow is also controlled using brattice-~~cloth~~ barricades. These  
6 consist of chain link fence that is bolted to the salt or attached to a structural member and  
7 covered with brattice cloth; and are used in instances where the only flow control requirement is  
8 to block the air. A brattice-~~cloth~~ air barricade is shown in Figure ~~A2-11M-52~~. Ventilation ~~will be~~  
9 maintained only in ~~all~~ active rooms within a panel until waste emplacement activities are  
10 completed and the panel-closure system is installed. The air ~~will be~~ routed simultaneously  
11 through ~~all~~ the active rooms within the panel. The filled rooms ~~will be~~ isolated from the  
12 ventilation system, while the active rooms that are actively being filled ~~will~~ receive a minimum of  
13 35,000 scfm of air when workers are present to assure worker safety. If an active room  
14 ventilation rate of 35,000 scfm cannot be met, actions as described in Permit Attachment O  
15 shall be taken during waste disposal operations when workers are present. After ~~all the~~ rooms  
16 within a panel are filled, the panel will be closed using a closure system described Permit  
17 Attachment G and Permit Attachment G1.

18 Once a disposal room is filled and is no longer needed for emplacement activities, it will be  
19 barricaded against entry and isolated from the mine ventilation system. This may be  
20 accomplished by any of the following: by removing the air regulator bulkhead, closing bulkhead  
21 doors, constructing chain link/brattice-~~cloth~~ barricades and, if necessary, constructing  
22 bulkheads at each end. A typical bulkhead is shown in ~~Figure A2-11a~~Permit Attachment G1,  
23 Appendix G1-B. There is no requirement for air for these rooms since personnel and/or  
24 equipment will not be in these areas.

25 The ventilation path for the waste disposal side is separated from the construction (e.g., mining)  
26 side by means of air locks, bulkheads, and salt pillars. A pressure differential is maintained  
27 between the construction side and the waste disposal side to ensure that any leakage is  
28 towards the disposal side. The pressure differential is produced by the surface fans in  
29 conjunction with the underground air regulators.

#### 30 Underground Ventilation Filtration System Description with Buildings 416 and 417

31 The Underground Ventilation Filtration System (**UVFS**) fans, which are part of the New Filter  
32 Building (**NFB**) (Building 416), provide enhanced ventilation in the underground, sufficient to  
33 allow concurrent mining and waste emplacement while in filtration mode (Figure M-53). The  
34 UVFS will provide filtered airflow through a surface mounted ventilation and filtration system.  
35 The intake duct to the surface ventilation and filtration facility is connected to the Exhaust Shaft.  
36 The exhaust from the underground will be directed to the salt-~~reduction~~ system located in the  
37 Salt-~~Reduction~~ Building (**SRB**) (Building 417).

38 Prior to passing through the NFB, air from the Exhaust Shaft may be directed through the SRB,  
39 which contains de-dusters, commonly used in the mining industry, and de-misters for salt dust  
40 and brine/water mist removal. The salt-~~reduction~~ system consists of multiple parallel de-dusting  
41 units. The exhaust from the de-dusting units is directed to the filter supply manifold and then to  
42 the filtration units. The combination of the de-duster and de-mister ~~combination~~ has a water  
43 wash-~~down~~ system that is connected to a water collection, treatment and sludge tank. The  
44 outlet of the water collection, treatment, and sludge tank is piped out of the SRB to an

1 evaporative pond. Accumulated water and salt will be characterized and disposed of in  
2 accordance with WIPP facility standard operating procedures.

3 Differential ~~pressure~~ instrumentation, located at each filter bank, will be provided with a high  
4 differential pressure alarm, which is monitored in the CMR. The exhaust from each of the filter  
5 banks is directed to a plenum which has a single duct that discharges to the environment  
6 through a stack.

#### 7 Underground Ventilation Modes of Operation

8 When the repository is configured to use four shafts, the underground ventilation system is  
9 designed to perform under three types of operation: normal (the HEPA exhaust filtration system  
10 is bypassed), filtered (the exhaust is filtered through the HEPA filtration system), if radioactive  
11 contaminants are detected or suspected, or a  
12 combined mode in which the air in the Disposal Circuit is filtered and the air in the North and  
13 Construction Circuits is unfiltered.

14 The possible modes of exhaust fan operation are as follows:

- 15 • ~~2~~Two main fans in operation
- 16 • ~~4~~One main fan in operation
- 17 • ~~4~~One filtration fan in filtered operation
- 18 • ~~2~~Two fans in filtered operation (one filtration fan and one IVS fan or two IVS fans)
- 19 • ~~3~~Three fans in filtered operation (one filtration fan and two IVS fans)
- 20 • ~~4~~One filtration fan in unfiltered operation
- 21 • ~~2~~Two filtration fans in unfiltered operation
- 22 • ~~4~~One main and ~~4~~One filtration fan in unfiltered operation
- 23 • ~~3~~Three fans in filtered operation (one filtration fan and two IVS fans exhausting  
24 through the Exhaust Shaft) and an underground SVS fan in operation (boosting  
25 fresh air into the mine causing the Salt Handling Shaft to serve as an unfiltered  
26 exhaust shaft for the North and Construction Circuits)

#### 27 Underground Ventilation Filtration System Modes of Operation with Building 416

28  
29 The UVFS, which includes the NFB, is designed to perform under two types of operation:  
30 filtered (the exhaust is filtered through the HEPA filtration system), and bypassed (the HEPA  
31 exhaust filtration system is bypassed).

32  
33 For UVFS Filtration Mode

- 34 • ~~4~~One exhaust fan

- 1 • ~~2~~Two exhaust fans
- 2 • ~~3~~Three exhaust fans
- 3 • ~~4~~Four exhaust fans

4 For UVFS Bypass Mode

- 5 • ~~1~~One to ~~4~~four exhaust fans

6  
7 Under some circumstances (e.g., power outages and maintenance activities), exhaust fan  
8 operation may be discontinued for short periods of time.

9 In the normal mode, two main surface exhaust fans, located near the Exhaust Shaft, ~~will~~ provide  
10 continuous ventilation of the underground areas. In this mode, underground ~~air~~flows join at the  
11 bottom of the Exhaust Shaft before discharge to the atmosphere. However, in some cases, the  
12 Salt Handling Shaft may be used as an unfiltered exhaust shaft to ventilate areas of the  
13 underground that do not need filtration.

14 Typically, outside air ~~will be~~is supplied to the construction areas and the waste disposal areas  
15 through the Air Intake Shaft, the Salt Handling Shaft, and access entries. A small quantity of  
16 outside air ~~will flow~~s down the Waste Shaft to ventilate the Waste Shaft ~~station~~Station. The  
17 ventilation system is designed to operate with the Air Intake Shaft as the primary source of fresh  
18 air. Under these circumstances, sufficient air ~~will be~~is available to simultaneously conduct ~~all~~  
19 underground operations (e.g., waste handling, mining, experimentation, and support).  
20 Ventilation may be supplied by operating fans in the configurations listed in the above  
21 description of the ventilation modes.

22 An underground SVS fan, located in the S-90 drift, provides additional ventilation to the  
23 underground facility, as needed. The SVS ventilates the following:

- 24 • The North and Construction Circuits, exhausting through the Salt Handling Shaft and
- 25 • The disposal areas of the underground, exhausting through the Exhaust Shaft and
- 26 through the filtration system
- 27
- 28

29 When the repository is configured to use five shafts, two intake fans located on the surface and  
30 connected to S#5 via ducting and a plenum, supply the majority of the intake air to the  
31 underground facility. The fans are designed to operate one fan at a time with the second fan  
32 available as a back-up fan. The fans have variable frequency drives that can adjust the intake  
33 flow at S#5 to meet the requirements of the underground ventilation filtration system and the  
34 Construction Circuit.

35 If the nominal flow of 425,000 scfm (12,028 m<sup>3</sup>/min) is not available (e.g., only one of the main  
36 ventilation fans is available), underground operations may proceed; ~~however~~, the number of  
37 activities that can be performed in parallel may be limited; depending on the quantity of air  
38 available. Ventilation may be supplied by operating one or more of the filtration exhaust fans. To  
39 accomplish this, the isolation dampers will be opened, which will permit air to flow from the main  
40 exhaust duct to the filter outlet plenum or to the IVS. The filtration fans may also be operated to

1 bypass the HEPA plenum. The isolation dampers of the filtration exhaust fan(s) to be employed  
2 will be opened, and the selected fan(s) will be switched on. In this mode, underground  
3 operations will be limited, because filtration exhaust fans cannot provide sufficient airflow to  
4 support the use of numerous pieces of diesel equipment.

5 If the nominal flow of 425,000 scfm (12,028 m<sup>3</sup>/min) is not available because the facility is  
6 operating in filtration mode, the exhaust air will pass through HEPA-filter assemblies, with  
7 filtration fans operating (i.e., ~~all~~-other fans are stopped). This system provides a means for  
8 removing the airborne particulates ~~that may contain radioactive and hazardous waste~~  
9 ~~particulates~~ before they are discharged through the exhaust stack to the atmosphere. The  
10 filtration mode is activated manually or automatically if the radiation monitoring system detects  
11 abnormally high concentrations of airborne radioactive particulates (an alarm is received from  
12 the continuous air monitor in the exhaust drift of the active waste panel) or a waste handling  
13 incident with the potential for a waste container breach is observed. The filtration mode is not  
14 initiated by the release of gases such as VOCs.

15 If utility-electrical power fails, the exhaust filter system is powered by backup diesel generators.  
16 Normal TRU mixed waste handling and related operations cease upon loss of utility-electric  
17 power and are not resumed until normal utility-electric power is returned. As specified in Permit  
18 Part 2, ~~all~~ waste handling equipment will "fail safe," meaning that it will retain its load during-in  
19 the event of a power outage.

#### 20 ~~Underground Ventilation Normal Mode Redundancy~~

21 ~~The underground ventilation system has been provided redundancy in normal ventilation mode~~  
22 ~~by the addition of a third main fan. Ductwork leading to that new fan ties into the existing main~~  
23 ~~exhaust duct.~~

#### 24 Electrical System

25 The WIPP facility uses electrical power ~~(utility power)~~ supplied by the regional electric utility  
26 company. If there is a loss of utility-power, TRU mixed waste handling and related operations  
27 will cease.

28 Backup, alternating current power will be provided on site by diesel generators. These units  
29 provide a high degree of reliability. Each of the diesel generators can carry predetermined  
30 equipment loads while maintaining additional power reserves. Predetermined loads include  
31 lighting and ventilation for underground facilities, lighting and ventilation for the TRU mixed  
32 waste handling areas, and the Air Intake Shaft hoist. The diesel generators can be brought ~~on~~  
33 lineonline within 30 minutes either manually or from the control panel in the ~~Central Monitoring~~  
34 ~~Room (CMR)~~CMR.

35 Uninterruptible power supply (UPS) units are also ~~on-line~~online providing power to  
36 predetermined monitoring systems. These systems ensure that the power to the radiation  
37 detection system for airborne contamination, the local processing units, the computer room, and  
38 the CMR will always be available, even during the interval between the loss of off-site power  
39 and initiation of backup diesel generator power.



1 A2-2a(4) RH TRU Mixed Waste Handling Equipment

2 The following are the major pieces of equipment used to manage RH TRU mixed waste in the  
3 geologic repository. A summary of equipment capacities is included in Table A2-3.

4 The Facility Cask Transfer Car

5 The Facility Cask Transfer Car is a self-propelled rail car (Figure ~~A2-14M-34~~) that operates  
6 between the Facility Cask Loading Room and the geologic repository. After the Facility Cask is  
7 loaded, the Facility Cask Transfer Car moves onto the ~~waste-Waste shaft-Shaft conveyance~~  
8 Conveyance and is then transported underground. At the underground ~~waste-Waste shaft-Shaft~~  
9 stationStation, the Facility Cask Transfer Car proceeds away from the ~~waste-Waste shaft-Shaft~~  
10 conveyance-Conveyance to provide forklift access to the Facility Cask.

11 Horizontal Emplacement ~~Machineand Retrieval Equipment~~ or Functionally Equivalent  
12 Equipment

13 ~~The Horizontal~~A horizontal Emplacement emplacement machine (HEM) and Retrieval  
14 Equipment (HERE) or functionally equivalent equipment (Figure ~~A2-15M-54~~), or functionally  
15 equivalent equipment, emplaces canisters into a borehole in a room wall of an Underground  
16 underground HWDU. Once the canisters have been emplaced, the ~~HERE HEM~~ then fills the  
17 borehole opening with a shield plug.

18 A2-2b Geologic Repository Process Description

19 ~~Prior to receipt of TRU mixed waste at the WIPP facility, waste operators will be thoroughly~~  
20 ~~trained in the safe use of TRU mixed waste handling and transport equipment. The training will~~  
21 ~~include both classroom training and on-the-job training.~~

22 RH TRU Mixed Waste Emplacement

23 The Facility Cask Transfer Car ~~is loaded~~loaded with a Facility Cask ~~is moved~~ onto the ~~waste~~  
24 Waste shaft-Shaft conveyance-Conveyance and is lowered to the ~~waste-Waste shaft-Shaft~~  
25 stationStation underground. At the ~~waste-Waste shaft-Shaft station-Station~~ underground, the  
26 Facility Cask is moved from the ~~waste-Waste shaft-Shaft conveyance-Conveyance~~ by the  
27 Facility Cask Transfer Car (Figure ~~A2-16M-55~~). A forklift is used to remove the Facility Cask  
28 from the Facility Cask Transfer Car and to transport the Facility Cask to the Underground  
29 HWDU. There, the Facility Cask is placed on the ~~HERE (Figure A2-17)HEM~~. The ~~HERE HEM~~ is  
30 used to emplace the RH TRU mixed waste canister into the borehole. The borehole ~~will be is~~  
31 visually inspected for obstructions prior to aligning the ~~HERE HEM~~ and emplacement of the RH  
32 TRU mixed waste canister. The Facility Cask is moved forward to mate with the shield collar,  
33 and the transfer carriage is advanced to mate with the rear Facility Cask shield valve. The shield  
34 valves on the Facility Cask are opened, and the transfer mechanism advances to push the  
35 canister into the borehole. After retracting the transfer mechanism into ~~the Facility Cask's~~  
36 housing, the ~~forward~~ shield valve(s) is closed, ~~and the transfer mechanism is further retracted~~  
37 ~~into its housing~~. The transfer mechanism is moved to the rear, and the shield plug carriage  
38 containing a shield plug is placed on the emplacement machine cask carriage. The transfer  
39 mechanism is used to push the shield plug ~~into the Facility Cask. The front shield valve is~~  
40 opened, and the shield plug is pushed into the borehole (~~Figure A2-18~~), thereby completing the

~~1 emplacement. The transfer mechanism is retracted, the shield valves close on the Facility Cask,~~  
~~2 and the Facility Cask is removed from the HERE.~~

3 A shield plug is a concrete filled cylindrical steel shell (Figure A2-24M-56) approximately 61 in-  
4 (155 cm) long and 29 in- (74 cm) in diameter, made of concrete shielding material inside a 0.24  
5 in- (0.61 cm)- thick steel shell with a removable pintle at one end. Each shield plug has integral  
6 forklift pockets and weighs approximately 3,750 ~~lbs~~pounds (lb) (1,700 kg). The shield plug is  
7 inserted with the pintle end closest to the HERE HEM to provide the necessary shielding ,  
8 limiting the borehole radiation dose rate at 11.8 in (30 cm) to less than 10 millirem/mrem per  
9 hour for a canister surface dose rate of 100 rem per hour/hr . Additional shielding is provided at  
10 the direction of the Radiological radiological Control control Technician technician based on  
11 dose rate surveys following shield plug emplacement. This additional shielding is provided by  
12 the manual emplacement of one or more shield plug supplemental shielding plates and a  
13 retainer (Figures A2-19 and A2-20M-56).

14 The amount of RH TRU mixed waste ~~disposal-disposed~~ in each panel is limited based on  
15 thermal and geomechanical considerations and shall not exceed 10 kilowatts per acre as  
16 described in Permit-AttachmentSection A2-1. RH Remote-handled TRU mixed waste  
17 emplacement boreholes shall beare drilled in the ribs of the panels at a nominal spacing of 8 ft  
18 (2.4 m) center-to-center, horizontally.

19 Figures A1-26M-40 and A1-27M-41 are flow diagrams of the RH TRU mixed waste handling  
20 process for the RH-TRU 72-B and CNS 10-160B casks, respectively.

## 21 CH TRU Mixed Waste Emplacement

22 ~~CH TRU mixed waste containers and shielded containers will arrive by tractor trailer at the~~  
23 ~~WIPP facility in sealed shipping containers. Prior to unloading the packages from the trailer,~~  
24 ~~they will undergo security and radiological checks and shipping documentation reviews. The~~  
25 ~~trailers carrying the shipping containers will be stored temporarily at the Parking Area Container~~  
26 ~~Storage Unit (Parking Area Unit). A forklift will remove the Contact Handled Packages from the~~  
27 ~~transport trailers and a forklift or Yard Transfer Vehicle will transport them into the Waste~~  
28 ~~Handling Building Container Storage Unit for unloading of the waste containers. Each~~  
29 ~~TRUPACT-II may hold up to two 7-packs, two 4-packs, two 3-packs, two SWBs, or one TDOP.~~  
30 ~~Each HalfPACT may hold up to seven 55-gal (208 L) drums, one SWB, one three-pack of~~  
31 ~~shielded containers or four 85-gal (322 L) drums. Each TRUPACT-III will hold one SLB2. An~~  
32 ~~overhead bridge crane or Facility Transfer Vehicle with transfer table will be used to remove the~~  
33 ~~waste containers from the Contact Handled Packaging and place them on a facility or~~  
34 ~~containment pallet. Each facility pallet has two recessed pockets to accommodate two sets of 7-~~  
35 ~~packs, two sets of 3-packs, two sets of 4-packs, two SWBs stacked two high, two TDOPs, or~~  
36 ~~one SLB2. Each stack of waste containers will be secured prior to transport underground (see~~  
37 ~~Figure A2-3). A forklift or the facility transfer vehicle will transport<sub>s</sub> the loaded facility pallet to the~~  
38 ~~conveyance loading room adjacent to the Waste Shaft. The facility transfer vehicle will beis~~  
39 ~~driven onto the waste-Waste shaft Shaft conveyance-Conveyance deck, where the loaded~~  
40 ~~facility pallet will beis transferred to the waste-Waste shaft Shaft conveyanceConveyance, and~~  
41 ~~the facility transfer vehicle will beis backed off. Containers of CH TRU mixed waste (55-gal~~  
42 ~~(208-L) drums, SWBs, 85-gal (322-L) drums, 100-gal (379-L) drums, and TDOPs) or shielded~~  
43 ~~containers can be handled individually, if needed, using the forklift and appropriate lifting~~  
44 ~~attachments (i.e.e.g., drum handlers, parrot beaks).~~



1 The ~~waste-Waste shaft-Shaft conveyance-Conveyance will~~ lowers the loaded facility pallet to the  
2 underground. At the ~~waste-Waste shaft-Shaft station~~Station, the CH TRU underground  
3 transporter ~~will is~~ backed up to the ~~waste-Waste shaft-Shaft conveyance~~Conveyance, and the  
4 facility pallet ~~will be is~~ transferred from the ~~waste-Waste shaft-Shaft conveyance-Conveyance~~  
5 onto the transporter (see Figure ~~A2-6M-46~~). The transporter ~~will is~~ then used to move the facility  
6 pallet to the appropriate ~~Underground-underground~~ HWDU for emplacement. The underground  
7 waste transporter is equipped with a fire suppression system, rupture-resistant diesel fuel tanks,  
8 and reinforced fuel lines to minimize the potential for a fire involving the fuel system.

9 A forklift in the HWDU ~~near the waste stack will be is~~ used to remove the waste containers from  
10 the facility pallets and to place them in the waste stack using a push-pull attachment or, in the  
11 case of an SLB2, the SLB2 ~~will be is~~ lifted from the facility pallet and placed directly on the floor  
12 of the emplacement room. The waste will be emplaced room by room in Panels 1 through 8.  
13 Each panel will be closed off from active ventilation when filled. If a waste container is damaged  
14 during the Disposal Phase, it will be immediately overpacked or repaired. ~~CH-Contact-handled~~  
15 TRU mixed waste containers ~~will be are~~ continuously vented. The filter vents ~~will allow~~  
16 aspiration, preventing internal pressurization of the container ~~and minimizing the buildup of~~  
17 ~~flammable gas concentrations~~.

18 Once a waste panel ~~is has been~~ mined and any initial ground control established, flow control  
19 devices ~~will be are~~ constructed to assure adequate control over ventilation during waste  
20 emplacement activities. The first room to be filled with waste ~~will be is typically~~ Room 7, which is  
21 the one that is farthest from the main access ~~ways~~drifts. A ventilation control point ~~will be is~~  
22 established for Room 7 either just outside the exhaust side of Room 6 or at the inlet side of  
23 Room 7. This ventilation control point ~~will consist is~~ of a flow control device (e.g., bulkhead with a  
24 ventilation regulator; or brattice cloth ~~barricade~~). When RH TRU mixed waste canister  
25 emplacement is completed in a room, CH TRU mixed waste emplacement can begin in that  
26 room. Stacking of CH TRU mixed waste ~~will typically~~ begins at the exhaust side of the room and  
27 proceeds down the access drift, through the room and up the intake access drift until the  
28 entrance of Room 6 is reached. At that point, a brattice-cloth and chain-link barricade and, if  
29 necessary, bulkheads will be ~~emplaced~~installed. This process ~~will be is typically~~ repeated for  
30 Room 6, and so on until Room 1 is filled. At that point, the panel closure system ~~will be is~~  
31 constructed.

32 The emplacement of CH TRU mixed waste into the HWDUs ~~will is~~ typically ~~be~~ in the order  
33 received and unloaded from the ~~Contact Handled Packaging~~CH packaging. There is no  
34 specification for the amount of space to be maintained between the waste containers  
35 themselves, or between the waste containers and the walls. Containers ~~will be are~~ stacked in  
36 the best manner to provide stability for the stack (~~which is~~ up to three containers high) and to  
37 make best use of available space. ~~It is anticipated that t~~he space between the wall and the  
38 container ~~could be are~~ ranges from 8 to 18 in. (20 to 46 cm). This space is a function of disposal  
39 room wall irregularities, container type, and sequence of emplacement. ~~Bags of backfill will~~  
40 ~~occupy some of this space~~. Space is required over the stacks of containers to assure adequate  
41 ventilation for waste handling operations. A minimum of 16 in. (41 cm) was specified in the Final  
42 Design Validation Report (Appendix D1, Chapter 12 of the WIPP RCRA Part B Permit  
43 Application (DOE, 1997)) to maintain air flow~~airflow~~. Typically, the space above a stack of  
44 containers ~~will be is~~ 36 to 48 in. (90 to 122 cm). However, ~~18 in. (0.45 m) will contain~~ backfill  
45 material, consisting of bags of ~~Magnesium Oxide (MgO)~~, ~~will take takes~~ up 18 in (45 cm) of  
46 height. Figure ~~A2-8M-48~~ shows a typical container configuration, although this figure does not  
47 mix containers on any row. Such mixing, while inefficient, ~~will be is~~ allowed to assure timely

1 movement of waste into the underground. No aisle space ~~will be~~ maintained for personnel  
2 access to emplaced waste containers. No roof maintenance behind stacks of waste is planned.

3 The anticipated schedule for the filling of each of the ~~Underground-underground~~ HWDUs known  
4 as Panels 1 through 8, 11, and 12, is shown in Permit Attachment G, Table G-1. Panel closure  
5 in accordance with the Closure Plan in Permit Attachment G and Permit Attachment G1 is  
6 estimated to require an additional ~~450-180~~ days following placement of the final waste in the  
7 panel.

8 Figures ~~A2-12M-38 and M-39 is-aare~~ flow diagrams of the CH TRU mixed waste handling  
9 process.

### 10 A2-3 Waste Characterization

11 ~~TRU-Transuranic~~ mixed waste characterization is described in Permit Attachment C.

### 12 A2-4 Treatment Effectiveness

13 ~~TRU-Transuranic~~ mixed waste treatment, as defined in 20.4.1. ~~404-100~~ NMAC (incorporating 40  
14 CFR §260.10), for which a permit is required, ~~will not be~~ performed at the WIPP facility.

### 15 A2-5 Maintenance, Monitoring, and Inspection

#### 16 A2-5a Maintenance

##### 17 A2-5a(1) Ground-Control Program

18 The ground-control program at the WIPP facility ~~will ensure~~ that any room in an HWDU in  
19 which waste will be placed ~~will be~~ sufficiently supported to assure waste disposal activities can  
20 be carried out safely. In addition, compliance with the applicable portions of the Land  
21 Withdrawal Act (LWA), which requires a regular review of roof-support plans and practices by  
22 the Mine Safety and Health Administration (MSHA). ~~Support is installed to~~ Ground control is  
23 performed in accordance with standard operating procedures that incorporate the requirements  
24 of 30 CFR §Part 57, Subpart B.

#### 25 A2-5b Monitoring

##### 26 A2-5b(1) Groundwater Monitoring

27 Groundwater monitoring for the ~~WIPP-U~~ underground HWDUs ~~will be~~ conducted in accordance  
28 with Permit Part 5 and Permit Attachment L ~~of this permit~~.

##### 29 A2-5b(2) Geomechanical Monitoring

30 The geomechanical monitoring program at the WIPP facility is an integral part of the ground-  
31 control program. ~~(See Figure A2-13). HWDUs Hazardous waste disposal units, and drifts, and~~  
32 geomechanical test rooms will be monitored to provide confirmation of structural integrity.  
33 Geomechanical data on the performance of the repository shafts and excavated areas ~~will~~  
34 be collected as part of the geotechnical field-monitoring program. The results of the  
35 geotechnical investigations ~~will be~~ reported annually in the Geotechnical Analysis Report

1 ~~(GAR)~~. The report ~~will~~describes monitoring programs and geomechanical data collected during  
2 the previous year.

3 A2-5b(2)(a) Description of the Geomechanical Monitoring System

4 The Geomechanical Monitoring System (**GMS**) provides in situ data to support the continuous  
5 assessment of the design for underground facilities. Specifically, the GMS provides for:

- 6 • Early detection of conditions that could affect operational safety~~.~~
- 7 • Evaluation of disposal room closure that ensures adequate access~~.~~
- 8 • Guidance for design modifications and remedial actions~~.~~and
- 9 • Data for interpreting the behavior of underground openings, in comparison with  
10 established design criteria~~.~~

11 The instrumentation in Table A2-2 is available for use in support of the geomechanical program.

12 The minimum instrumentation for each of the ~~eight~~ten panels ~~will be~~is one borehole  
13 extensometer installed in the roof ~~at~~near the center of each disposal room. The roof  
14 extensometers ~~will~~ monitor the dilation of the immediate salt roof beam and possible bed  
15 separations along clay seams. Additional instrumentation will be installed as conditions warrant.

16 Remote polling of the geomechanical instrumentation ~~will be~~is performed at least once every  
17 month. This frequency may be increased to accommodate any changes that may develop.

18 The results from the remotely read instrumentation ~~will be~~are evaluated after each scheduled  
19 polling. Documentation of the results ~~will be~~are provided annually in the ~~Geotechnical Analysis~~  
20 ~~Report~~GAR.

21 Data from remotely read instrumentation ~~will be~~are maintained as part of a geotechnical  
22 instrumentation system. The instrumentation system provides for data maintenance, retrieval,  
23 and presentation. The Permittees ~~will~~ retrieve the data from the instrumentation system and  
24 verify data accuracy by confirming the measurements were taken in accordance with applicable  
25 instructions and equipment calibration is known. Next, the Permittees ~~will~~ review the data after  
26 each polling to assess the performance of the instrument and of the excavation. Anomalous  
27 data will be investigated to determine the cause (instrumentation problem, error in recording,  
28 changing rock-ground conditions). The Permittees ~~will~~ calculate various parameters such as the  
29 change between successive readings and deformation rates. This assessment ~~will be~~is reported  
30 to the Permittees' cognizant ground control engineer and operations personnel. The Permittees  
31 will investigate unexpected deformation to determine if remediation is needed.

32 The stability of an open panel excavation is generally determined by the rock deformation rate.  
33 The excavation may be unstable when there is a continuous increase in the deformation rate  
34 that cannot be controlled by the installed support system. The Permittees ~~will~~ evaluate the  
35 performance of the excavation. These evaluations assess the effectiveness of the roof support  
36 system and estimate the stand-up time of the excavation. If an open panel shows the trend is  
37 toward adverse (unstable) conditions, the results will be reported to determine if it is necessary  
38 to terminate waste disposal activities in the open panel. This report of the trend toward adverse

1 conditions in an open HWDU will also be provided to the Secretary of the NMED within seven  
2 (7) calendar days of issuance of the report.

3 In the annual Geotechnical Analysis Report, the Permittees shall provide a summary of the  
4 results of the monthly surveillance of oil and gas production and salt water disposal wells within  
5 a one-mile perimeter outside the Land Withdrawal Act boundary.

#### 6 A2-5b(2)(b) — System Experience

7 ~~Much experience in the use of geomechanical instrumentation was gained as the result of~~  
8 ~~performance monitoring of Panel 1, which began at the time of completion of the panel~~  
9 ~~excavation in 1988. The monitoring system installed at that time involved simple measurements~~  
10 ~~and observations (e.g., vertical and horizontal convergence rates, and visual inspections).~~  
11 ~~Minimal maintenance of instrumentation is required, and the instrumentation is easily replaced if~~  
12 ~~it malfunctions. Conditions throughout Panel 1 are well known. The monitoring program~~  
13 ~~continues to provide data to compare the performance of Panel 1 with that established~~  
14 ~~elsewhere in the underground. Panel 1 performance is characterized by the following:~~

- 15 ~~• The development of bed separations and lateral shifts at the interfaces of the salt~~  
16 ~~and the clays underlying the anhydrites “a” and “b.”~~
- 17 ~~• Room closures. A closure due only to the roof movement will be separated from~~  
18 ~~the total closure.~~
- 19 ~~• The behavior of the pillars.~~
- 20 ~~• Fracture development in the roof and floor.~~
- 21 ~~• Distribution of load on the support system.~~

22 ~~Roof conditions are assessed from observation boreholes and extensometer measurements.~~  
23 ~~Measurements of room closure, rock displacements, and observations of fracture development~~  
24 ~~in the immediate roof beam are made and used to evaluate the performance of a panel. A~~  
25 ~~description of the Panel 1 monitoring program was presented to the members of the~~  
26 ~~Geotechnical Experts Panel (in 1991) who concurred that it was adequate to determine~~  
27 ~~deterioration within the rooms and that it will provide early warning of deteriorating conditions.~~

28 The assessment and evaluation of the condition of WIPP repository excavations is an  
29 interactive, continuous process using the data from the monitoring programs. Criteria for  
30 corrective action are continually reevaluated and reassessed based on total performance to  
31 date. Actions taken are based on these analyses and planned utilization of the excavation.  
32 Because WIPP excavations are in a natural geologic medium, there is inherent variability from  
33 point to point. The principle adopted is to anticipate potential ground control requirements and  
34 implement them in a timely manner rather than to wait until a need arises.

#### 35 A2-5b(3) Volatile Organic Compound Monitoring

36 The volatile organic compound monitoring for the WIPP Underground HWDUs will be conducted  
37 in accordance with Permit Part 4 and Permit Attachment N ~~of this permit.~~

1 A2-5c Inspection

2 ~~The inspection~~Inspections of the ~~WIPP U~~nderground HWDUs ~~will be~~are conducted in  
3 accordance with Permit Part 2 and Permit Attachment E ~~of this permit.~~

4 References

5 DOE, 1997. Resource Conservation and Recovery Act Part B Permit Application, Waste  
6 Isolation Pilot Plant (WIPP), Carlsbad, New Mexico, Revision 6.5, 1997.

7 DOE, 2009. WIPP Hazardous Waste Facility Permit Amended Renewal Application, Carlsbad,  
8 New Mexico, September 2009.

9 DOE, 2020. WIPP Hazardous Waste Facility Permit Renewal Application, Carlsbad, New  
10 Mexico, March 2020.

## TABLES

1  
2

**Table A2-1  
 CH TRU Mixed Waste Handling Equipment Capacities**

<b>Capacities for Equipment (lb)</b>	
Facility Pallet	25,000 <del>lbs.</del>
Facility Transfer Vehicle	26,000 <del>lbs.</del>
Underground transporter	28,000 <del>lbs.</del>
Underground forklift	12,000 <del>lbs.</del>
<u>SLB2 forklift</u>	<u>36,000</u>
<b>Maximum Gross Weights of Containers (lb)</b>	
Seven-pack of 55-gallon <del>gal</del> (208-L) drums	7,000 <del>lbs.</del>
Four-pack of 85-gallon <del>gal</del> (322-L) drums	4,500 <del>lbs.</del>
Three-pack of 100-gallon <del>gal</del> (379-L) drums	3,000 <del>lbs.</del>
Ten-drum overpack	6,700 <del>lbs.</del>
Standard waste box	4,000 <del>lbs.</del>
Standard large box 2	10,500 <del>lbs.</del>
Shielded container	2,260 <del>lbs.</del>
Three-pack of shielded containers	7,000 <del>lbs.</del>
<b>Maximum Net Empty Weights of Equipment (lb)</b>	
TRUPACT-II	13,140 <del>lbs.</del>
HalfPACT	10,500 <del>lbs.</del>
TRUPACT-III	43,600 <del>lbs.</del>
Facility pallet	4,120 <del>lbs.</del>

3

**Table A2-2  
 Instrumentation Used in Support of the Geomechanical Monitoring System**

<b>Instrument Type</b>	<b>Features</b>	<b>Parameter Measured</b>	<b>Range</b>
Borehole Extensometer	The extensometer provides for monitoring the deformation parallel to the borehole axis. Units suitable for up to 5 measurements anchors in addition to the reference head. Maximum borehole depths <del>shall be</del> 50 feet.	Cumulative Deformation	0-2 <del>inches</del> <u>in</u>
Borehole Television Camera	Closed circuit television may be used for monitoring areas otherwise inaccessible, such as boreholes or shafts.	Video Image	N/A
Convergence Points and Tape Extensometers	Mechanically anchored eyebolts to which a portable tape extensometer is attached.	Cumulative Deformation	2-50 <del>feet</del> <u>ft</u>
Convergence Meters	Includes wire and sonic meters. Mounted on rigid plates anchored to the rock surface.	Cumulative Deformation	2-50 <del>feet</del> <u>ft</u>
<del>Inclinometers</del>	<del>Both vertical and horizontal inclinometers are used. Traversing type of system in which a probe is moved periodically through casing located in the borehole whose inclination is being measured.</del>	<del>Cumulative Deformation</del>	<del>0-30 degrees</del>
Rock Bolt Load Cells	Spool type units suitable for use with rock bolts. Tensile stress is inferred from strain gauges mounted on the surface of the spool.	Load	0-300 kips
Earth Pressure Cells	Installed between concrete keys and rock. Preferred type is a hydraulic pressure plate connected to a vibrating wire transmitter.	Lithostatic Pressure	0-1,000 <del>pounds per square inch</del> <u> (psi)</u>
Piezometer Pressure Transducers	Located in shafts and of robust design and construction. Periodic checks on operability required.	Fluid Pressure	0-500 psi
Strain Gauges	Installed within the concrete shaft key. Suitably sealed for the environment. Two types used:-- surface mounted and embedded.	Cumulative Deformation	0-3,000 <del>microinches per inch</del> <u> (µin/in)</u> (embedded) 0-2,500 µin/in (surface)



**Table A2-3  
 RH TRU Mixed Waste Handling Equipment Capacities**

<b>Capacities for Equipment (lb)</b>	
41-Ton Forklift	82,000 <del>lbs</del>
<b>Maximum Gross Weights of RH TRU Containers (lb)</b>	
RH TRU Facility Canister	10,000 <del>lbs</del>
55- <del>Gallon-gal (208-L)</del> Drum	1,000 <del>lbs</del>
RH TRU Canister	8,000 <del>lbs</del>
<b>Maximum Net Empty Weights of Equipment (lb)</b>	
Facility Cask	67,700 <del>lbs</del>
<u>Light Weight Facility Cask</u>	<u>48,450</u>

## FIGURES

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment A2  
 November 2022/December 2022 Renewal Draft Permit

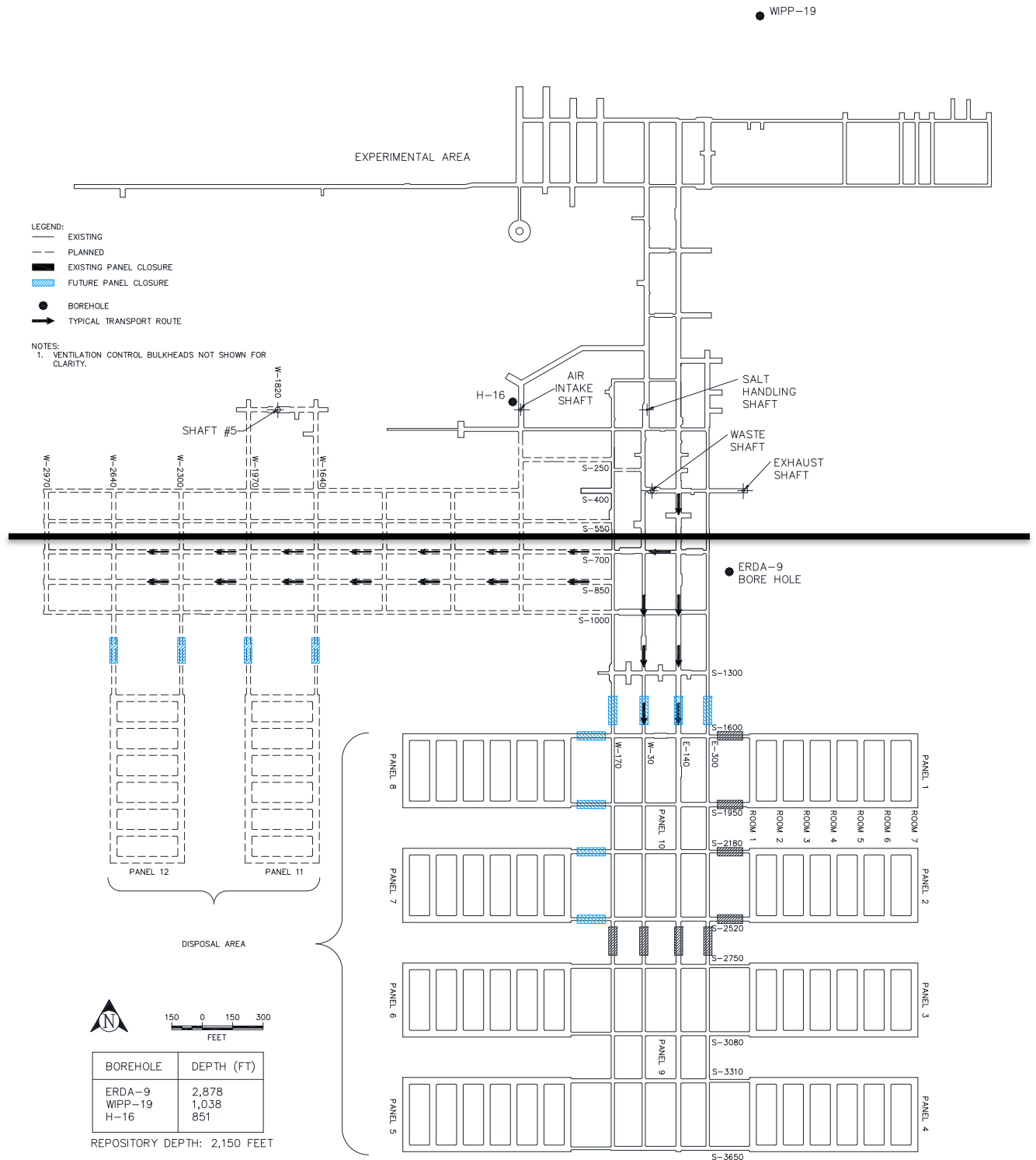
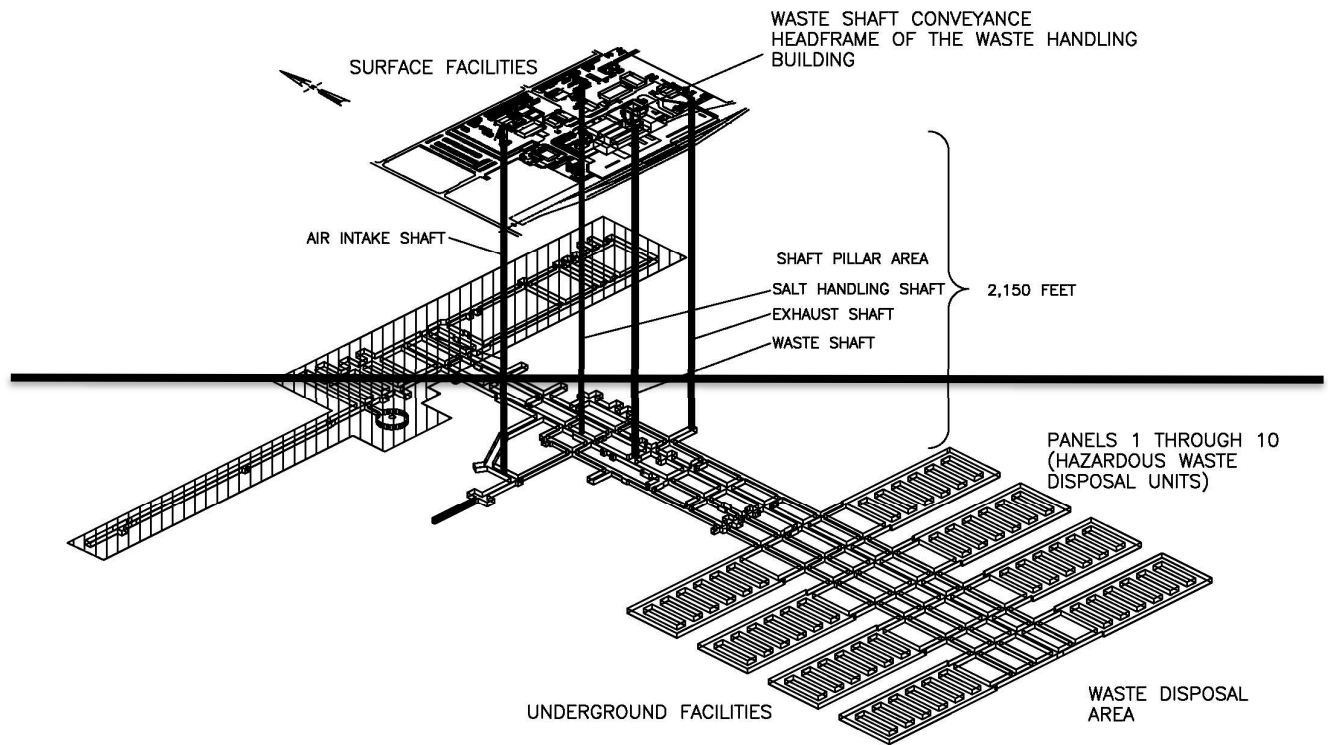


Figure A2-1  
 Repository Horizon



**Figure A2-2**  
**Spatial View of the Miscellaneous Unit and Waste Handling Facility**

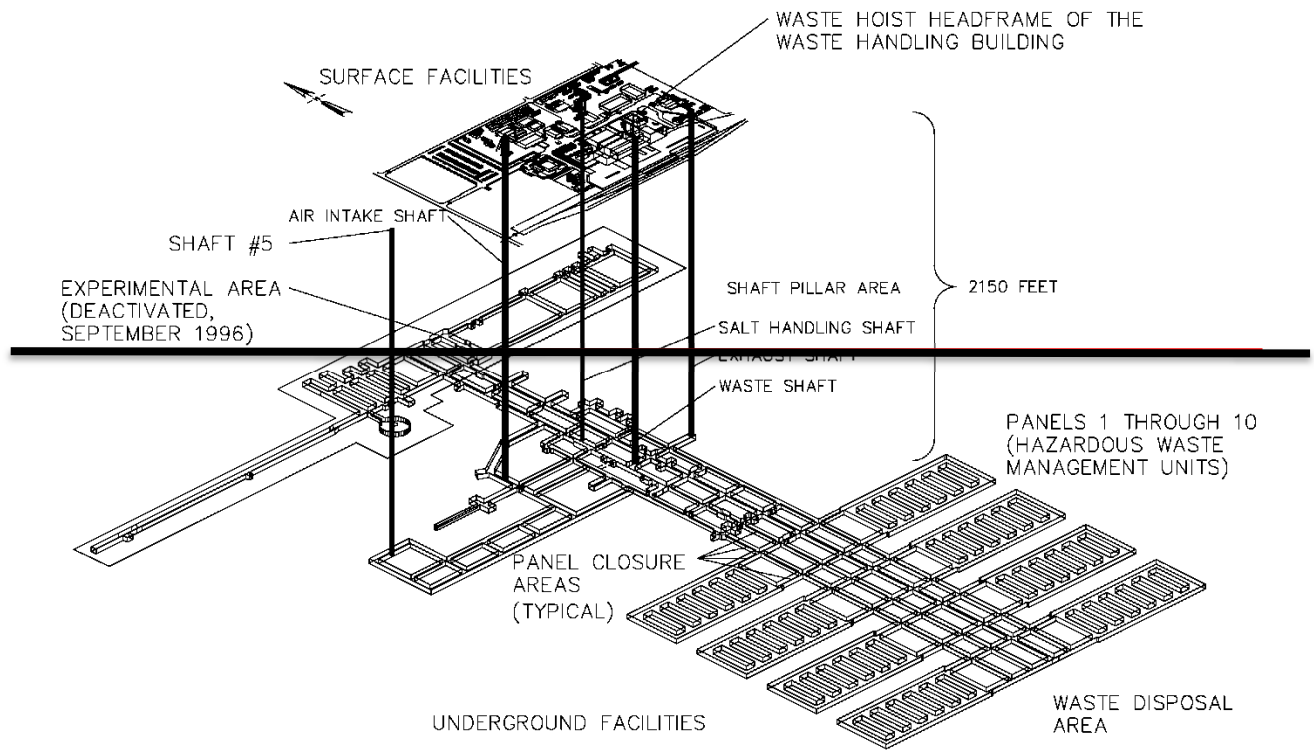


Figure A2-2-S#5  
 Spatial View of the Miscellaneous Unit and Waste Handling Facility (with S#5)

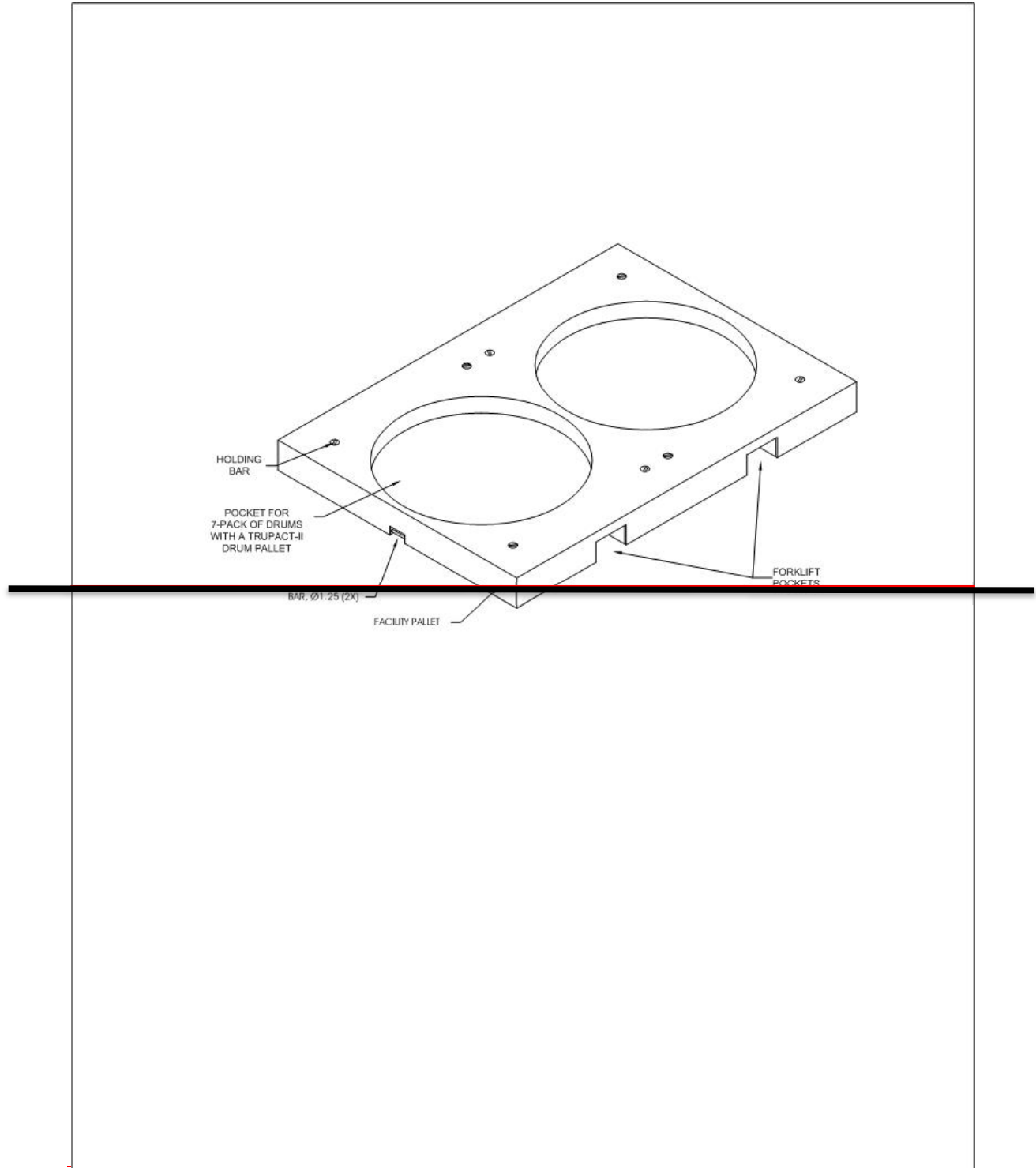


Figure A2-3  
Facility Pallet for Seven-Pack of Drums

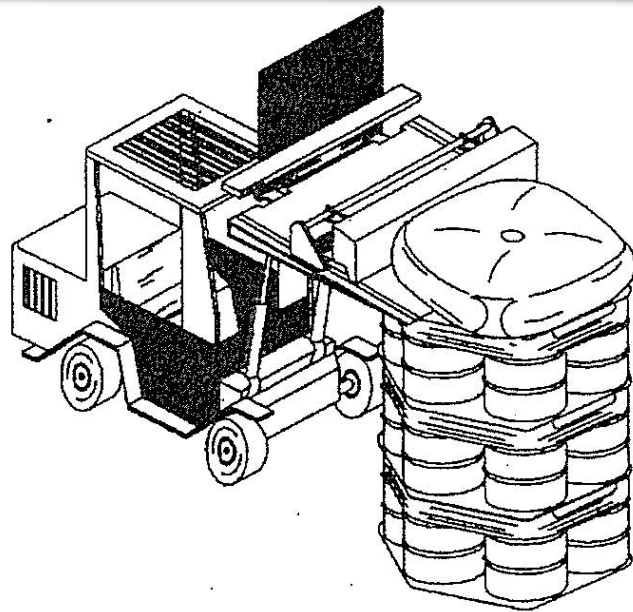
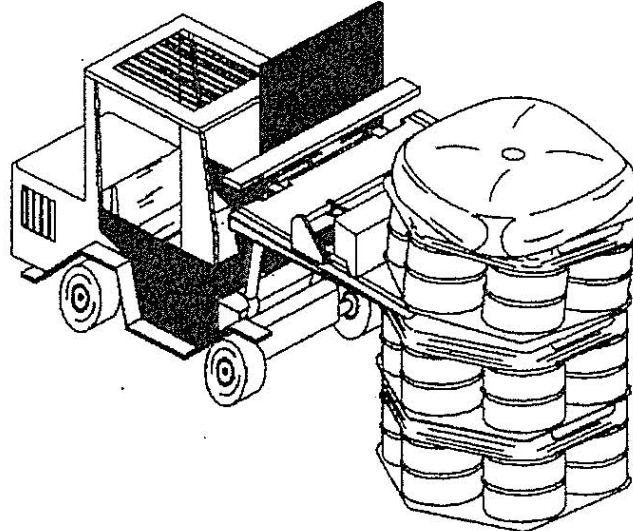


Figure A2-5  
Typical Backfill Sacks Emplaced on Drum Stacks

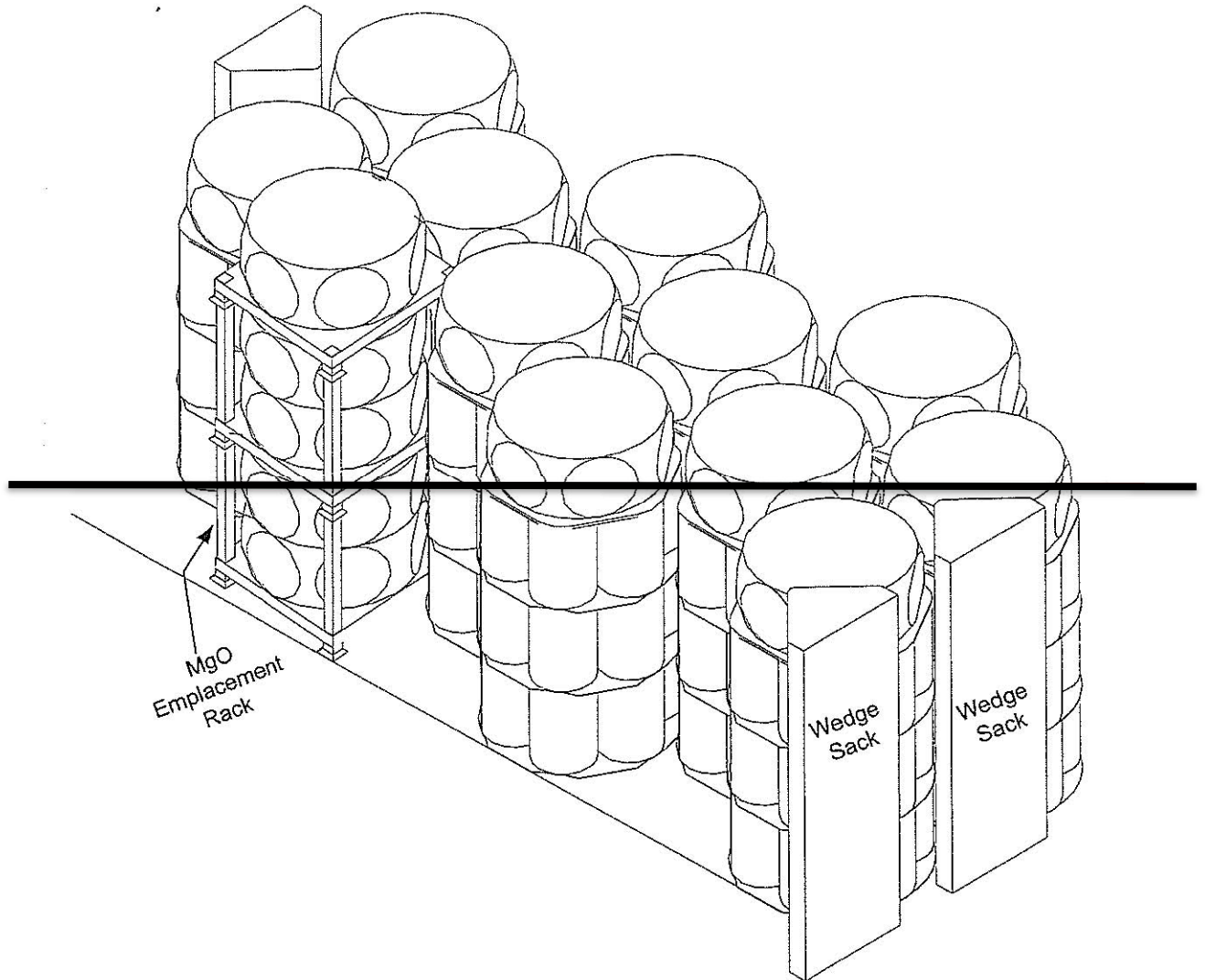


Figure A2-5a  
Potential MgO Emplacement Configurations



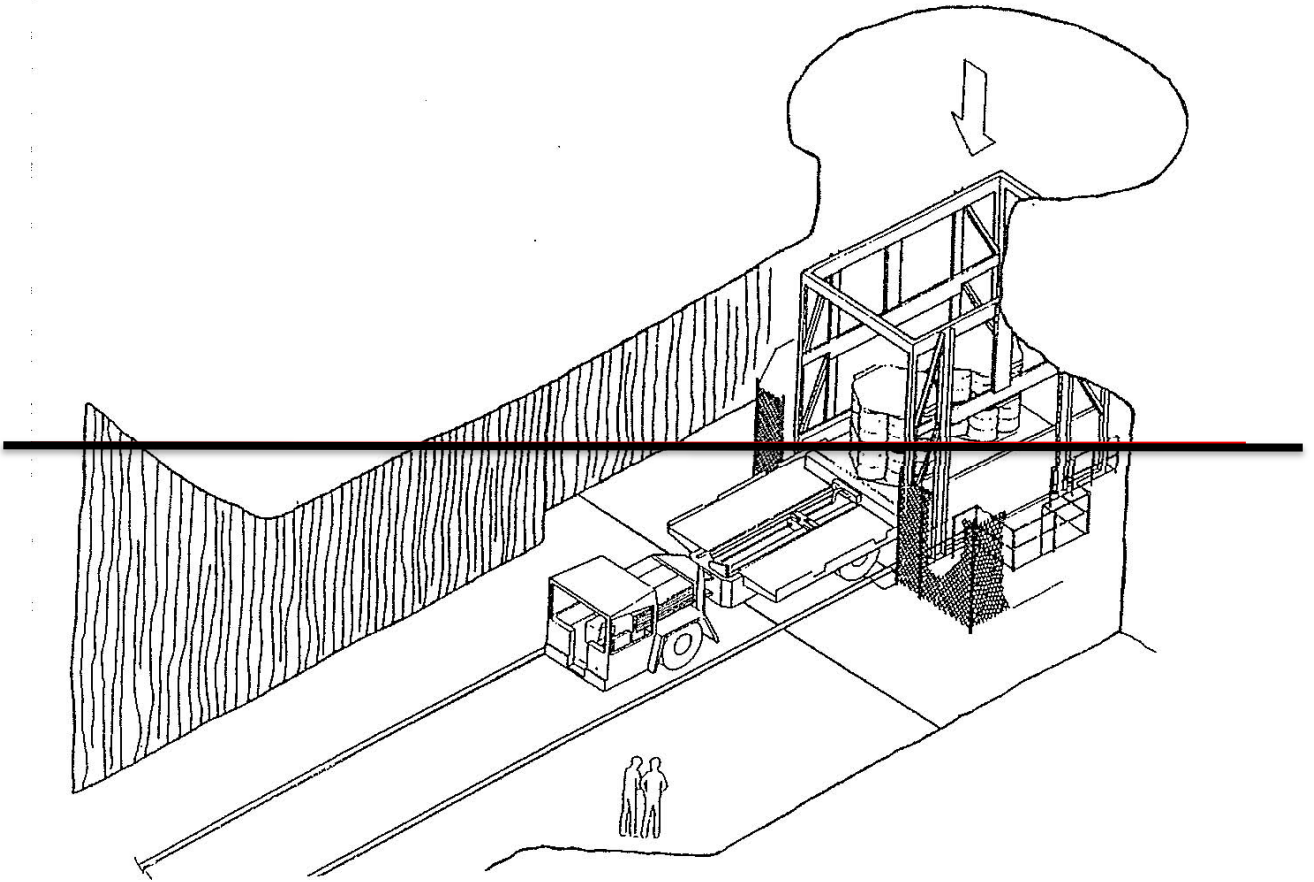


Figure A2-6  
Waste Transfer Cage to Transporter

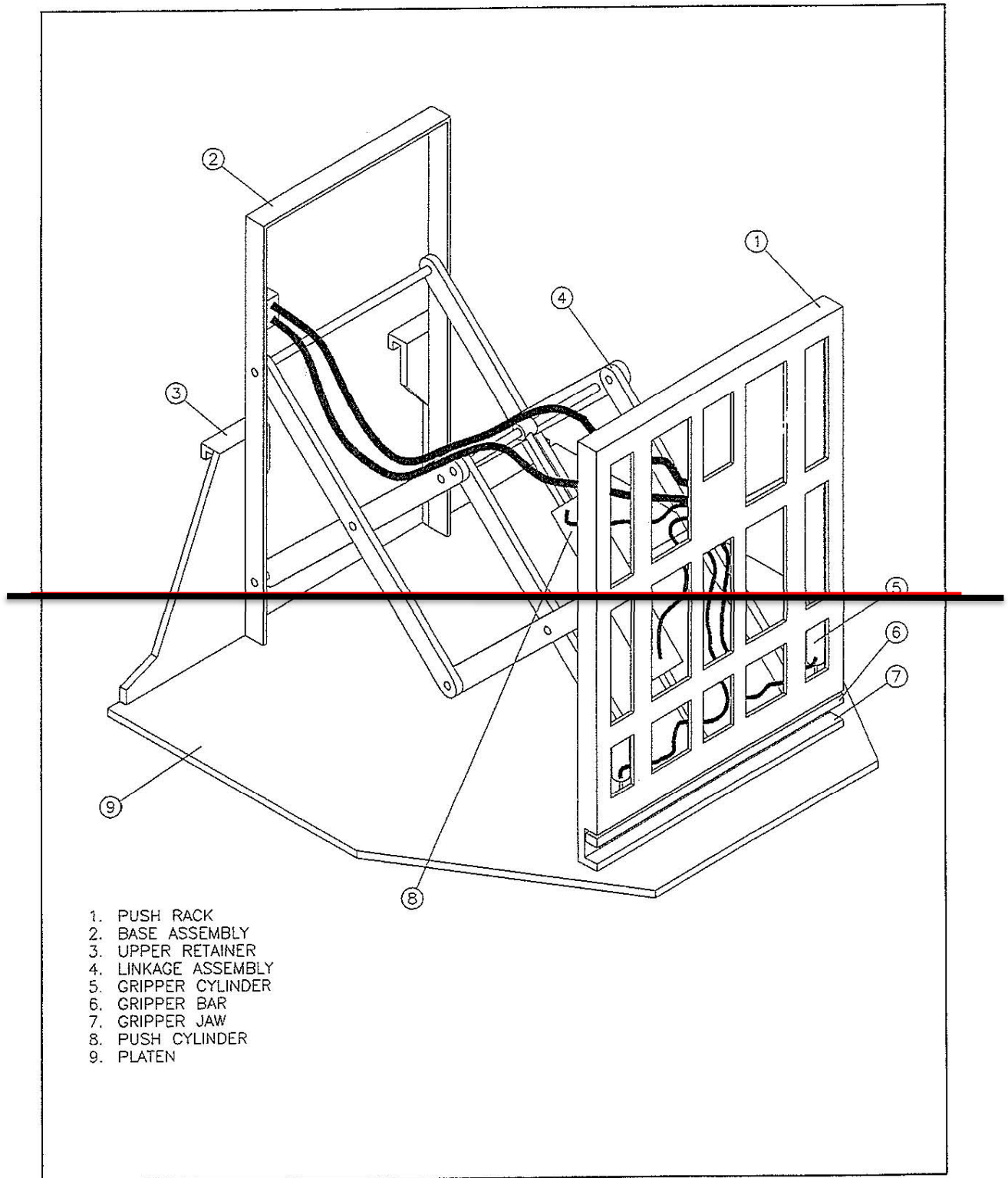


Figure A2-7  
Push-Pull Attachment to Forklift to Allow Handling of Waste Containers

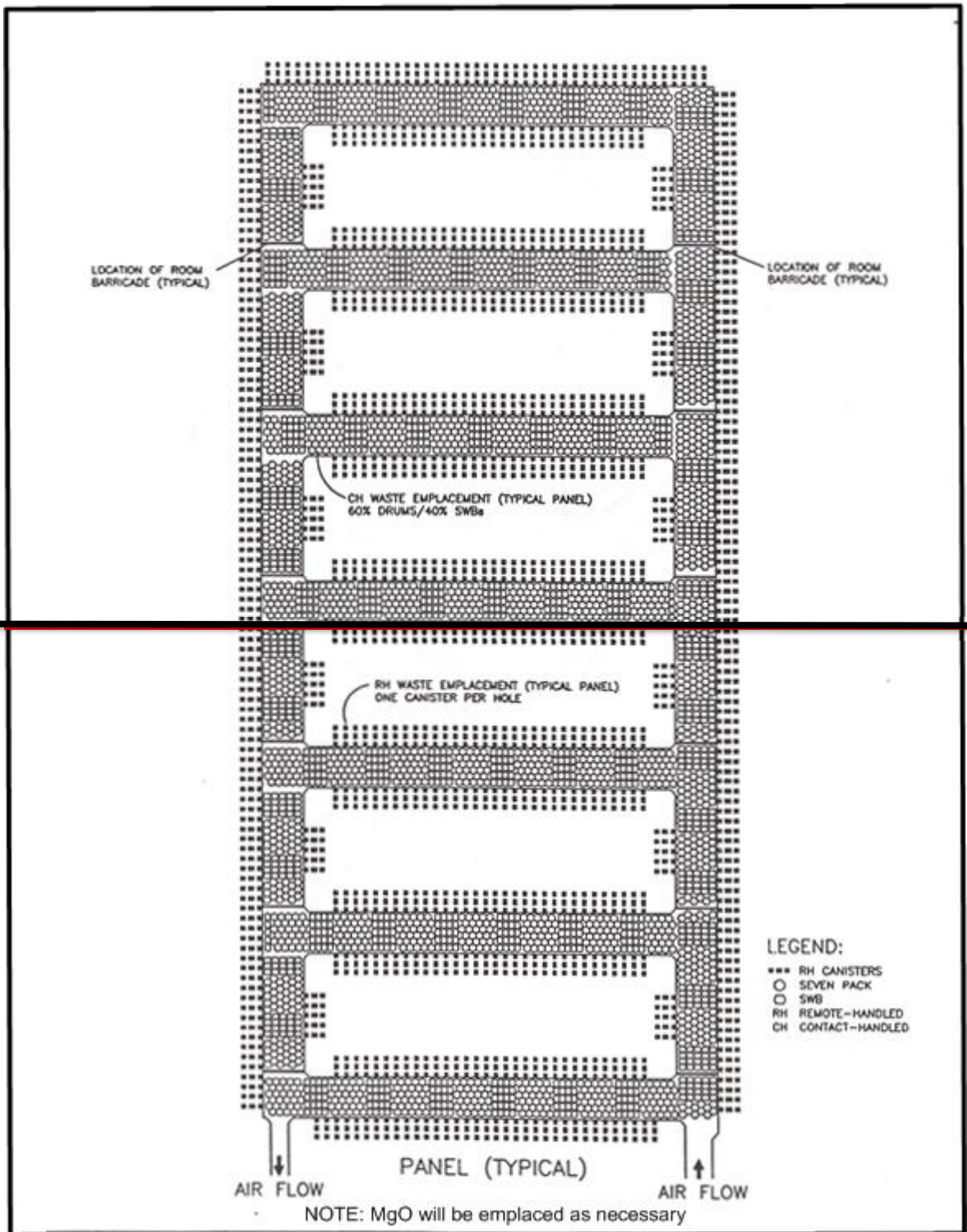


Figure A2-8  
 Typical RH and CH Transuranic Mixed Waste Container Disposal Configuration

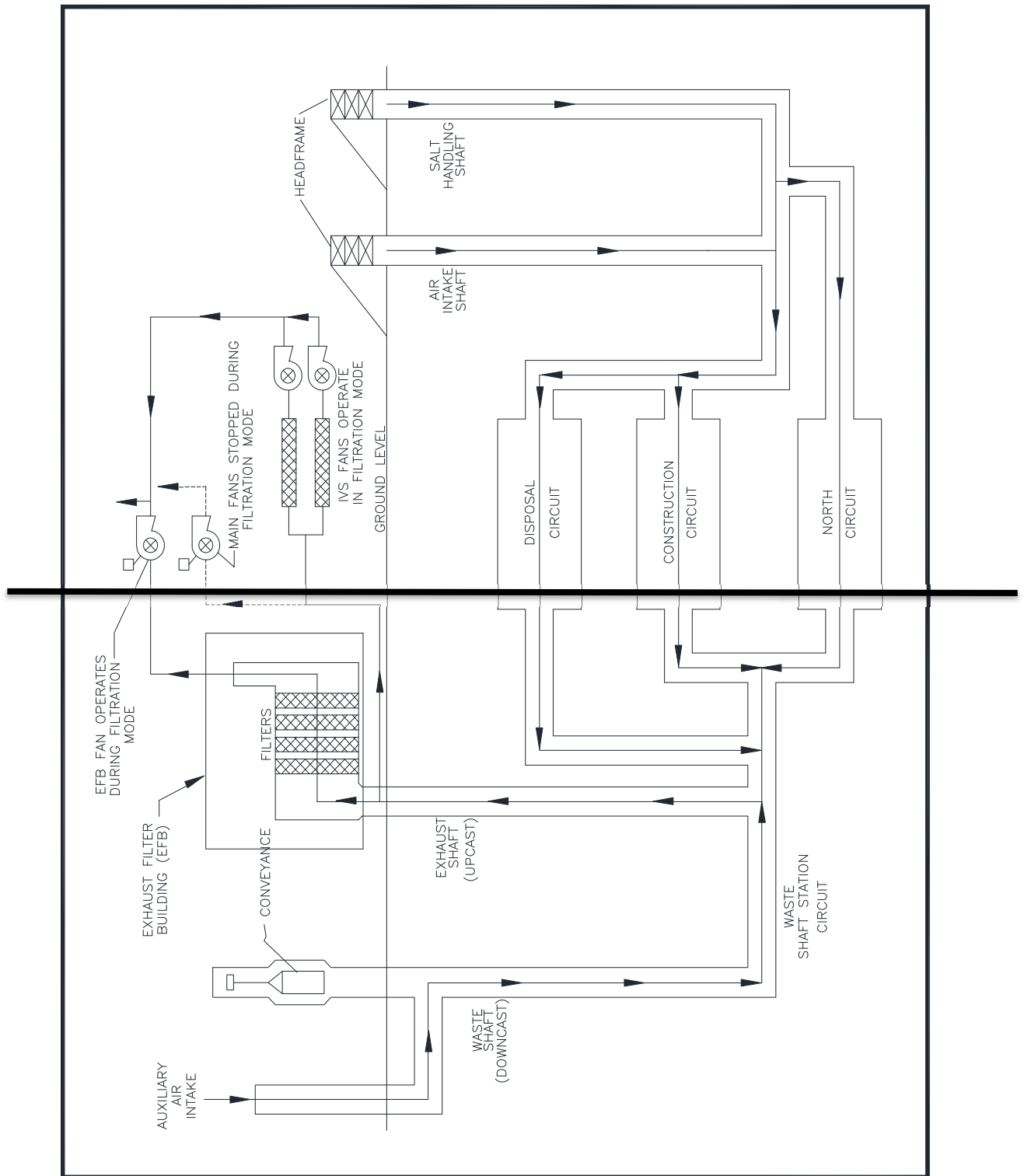


Figure A2-9a  
Underground Ventilation System Airflow

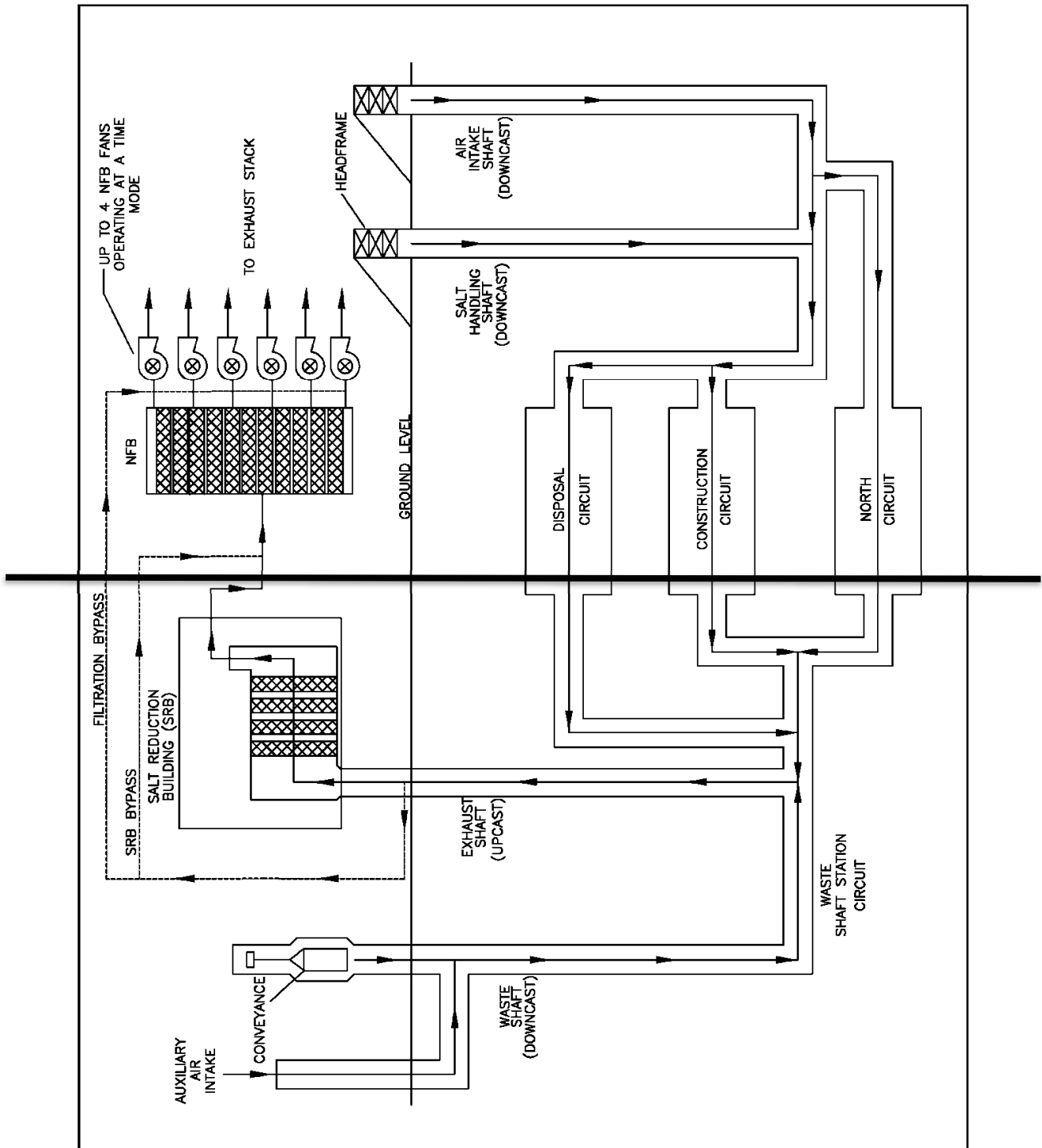


Figure A2-9a-NFB  
 Underground Ventilation System Airflow (with Building 416)

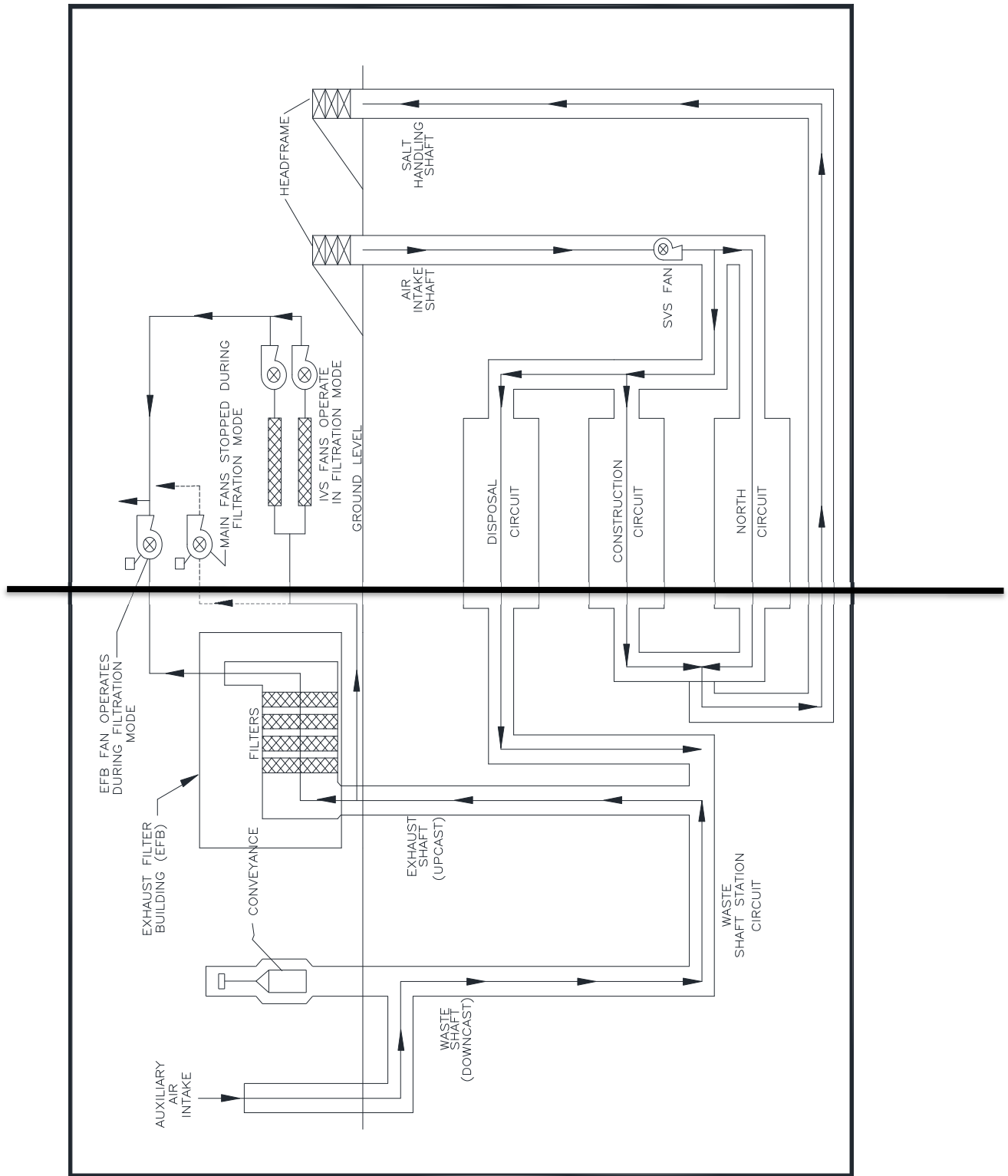
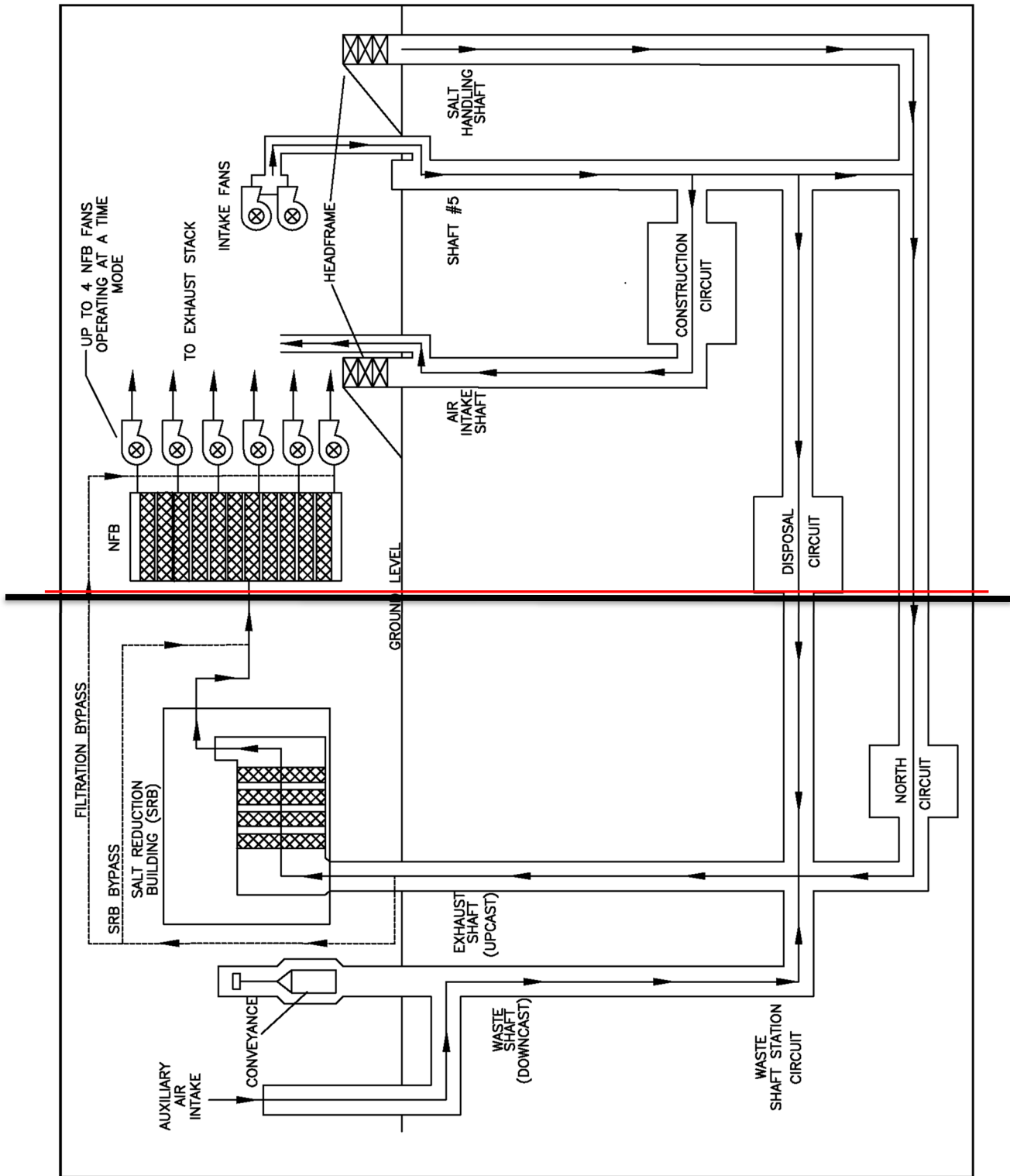


Figure A2-9b  
 Underground Ventilation System Airflow (with SVS)



**Figure A2-9c**  
**Underground Ventilation System Airflow (with S#5)**



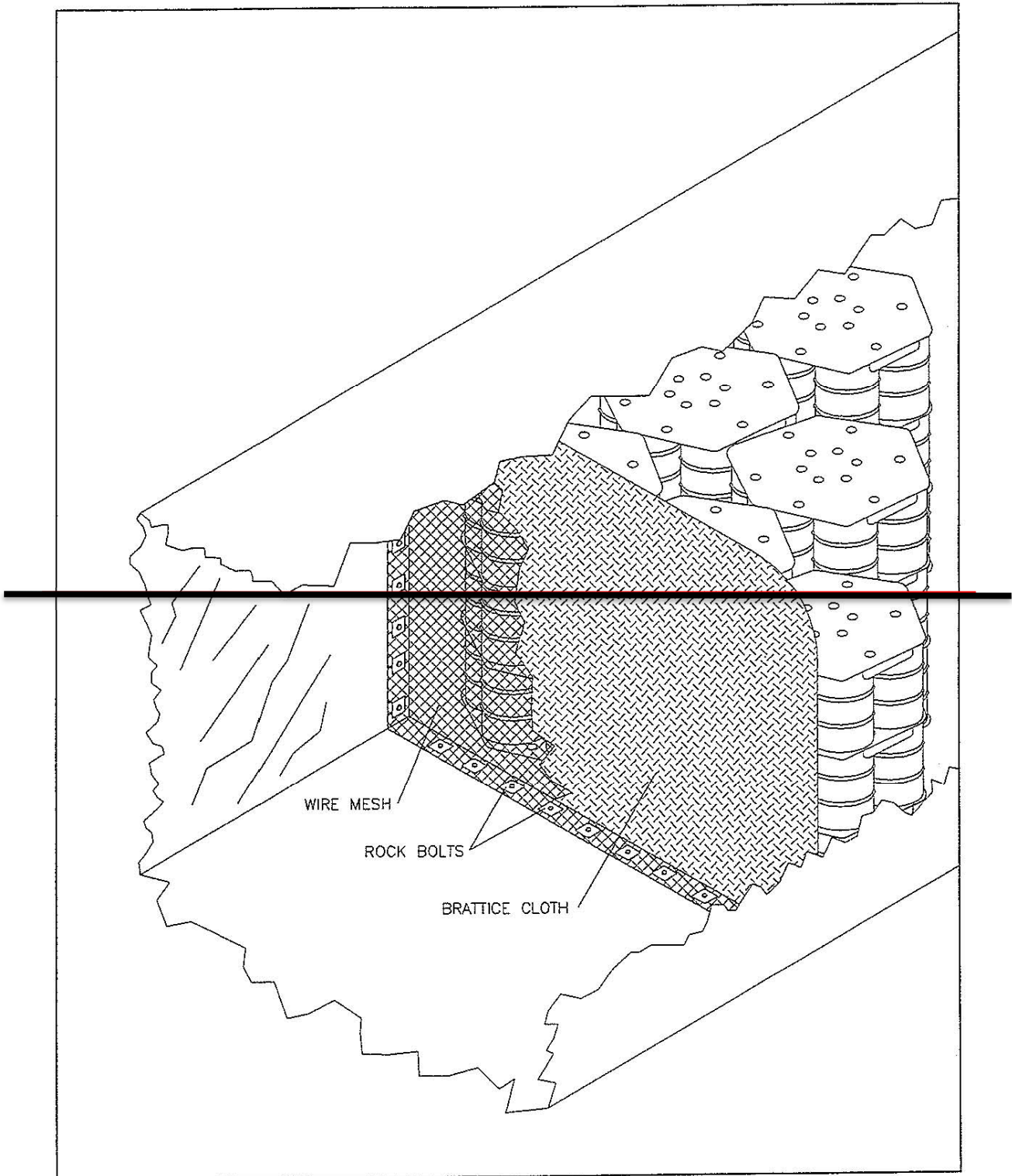


Figure A2-11  
Typical Room Barricade



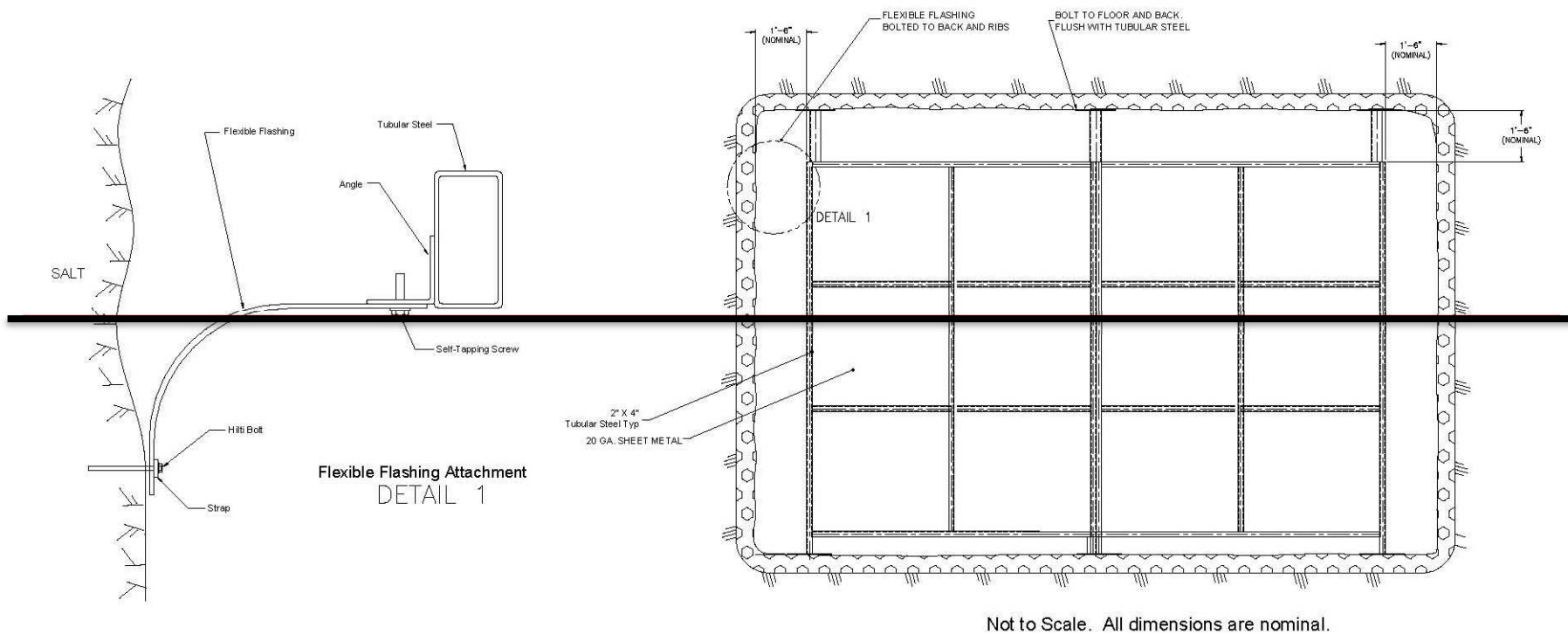


Figure A2-11a  
Typical Bulkhead

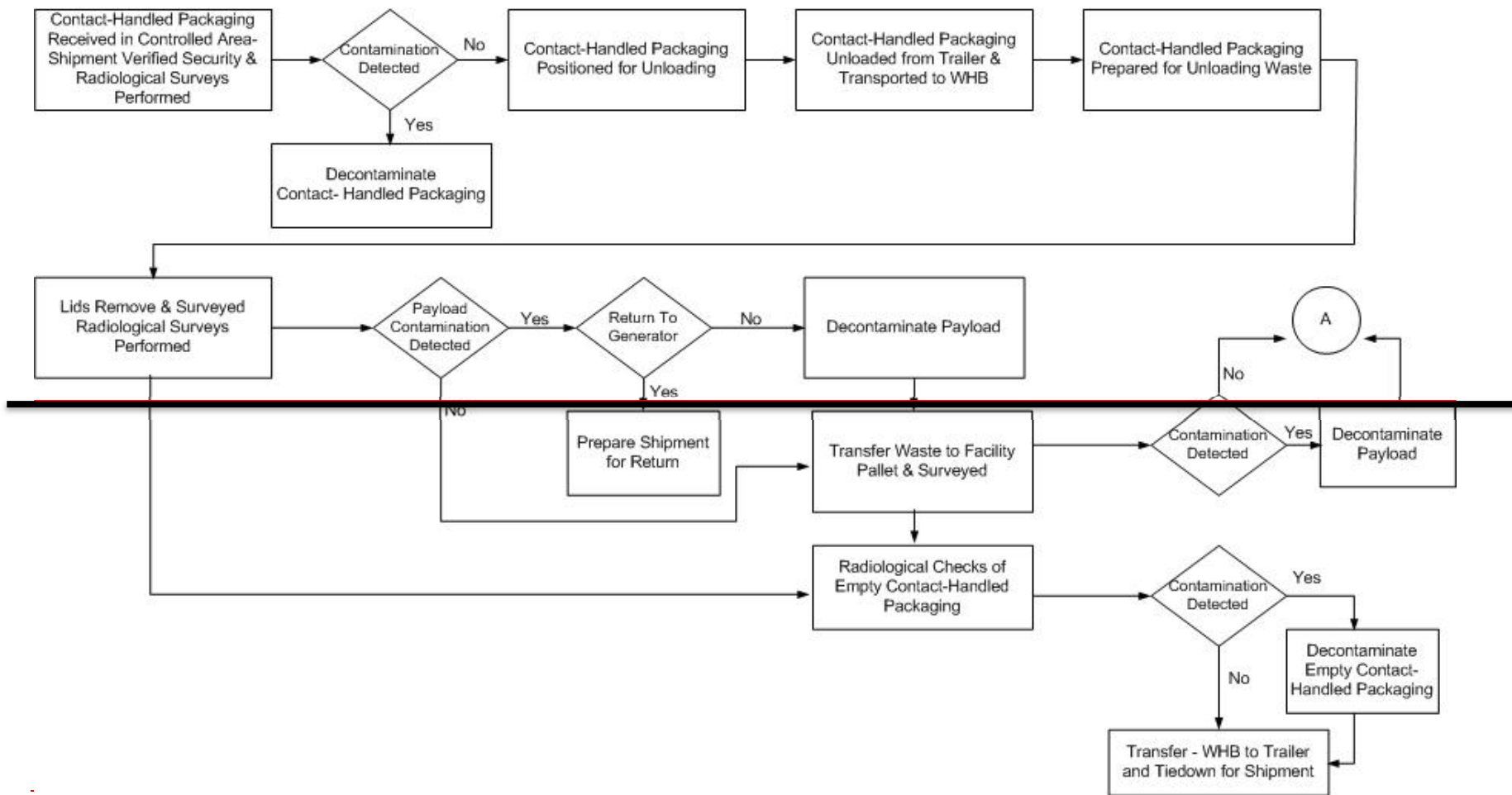


Figure A2-12  
 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram

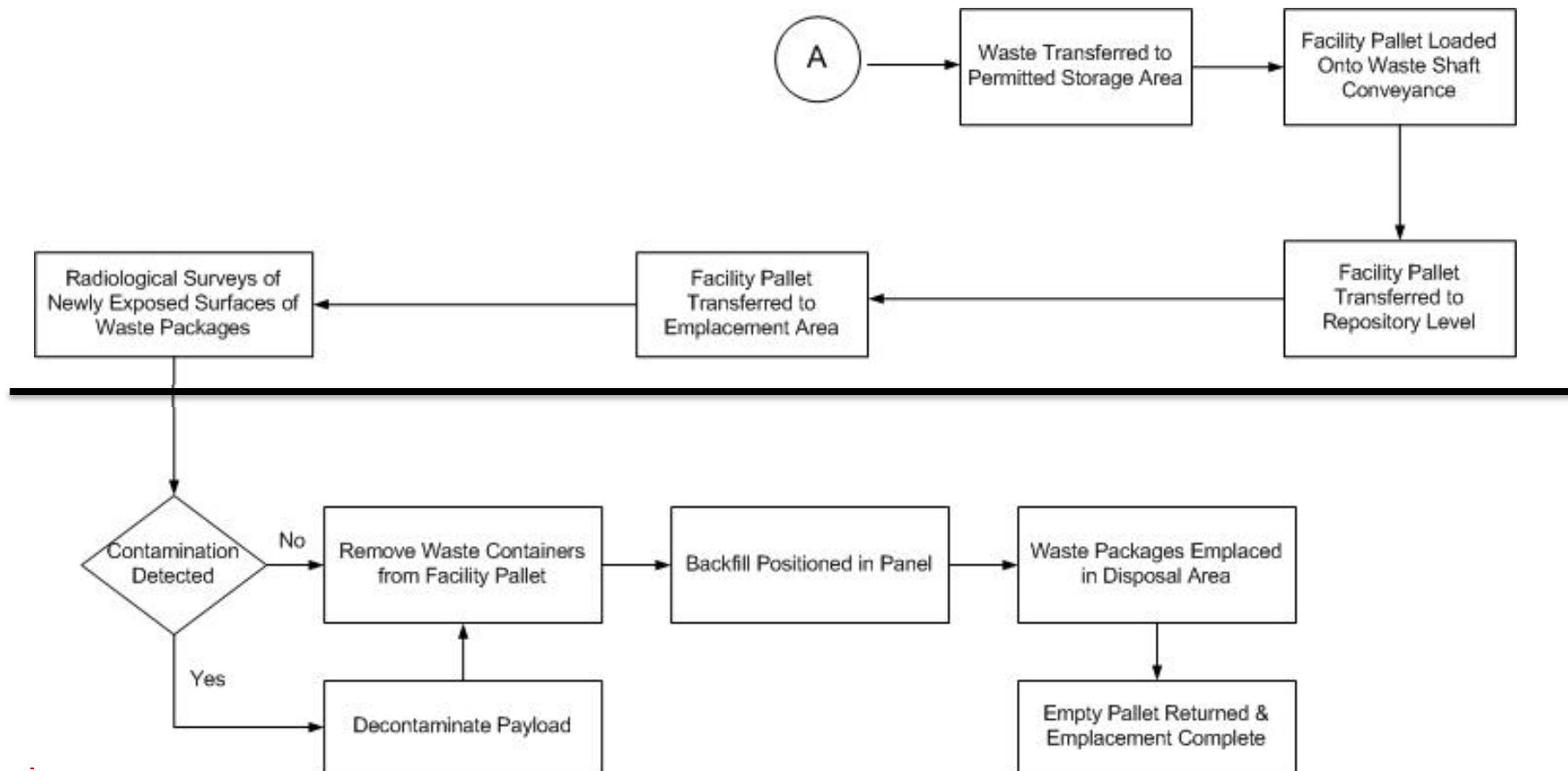


Figure A2-12  
 WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram (Continued)

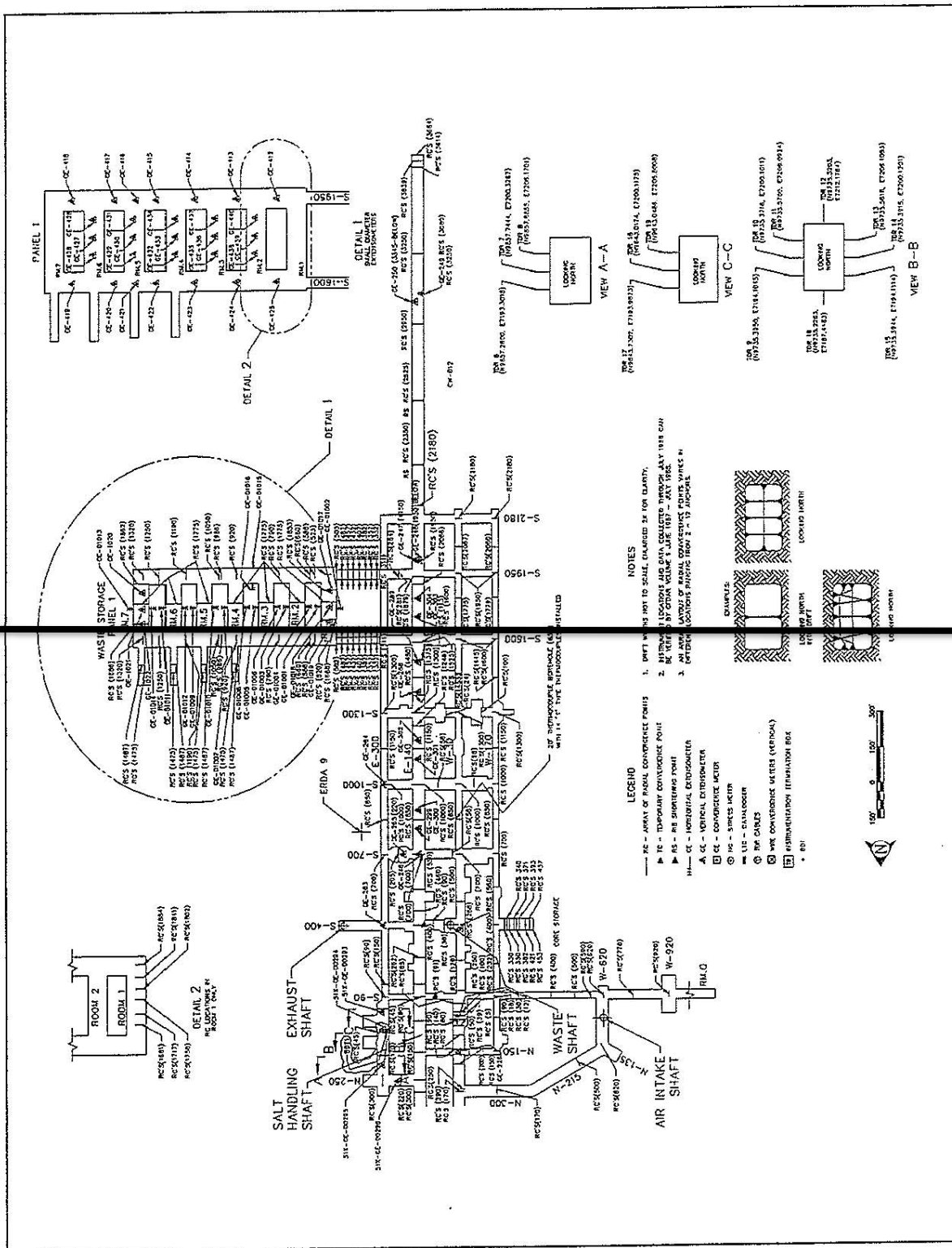


Figure A2-13  
 Layout and Instrumentation—As of 1/96

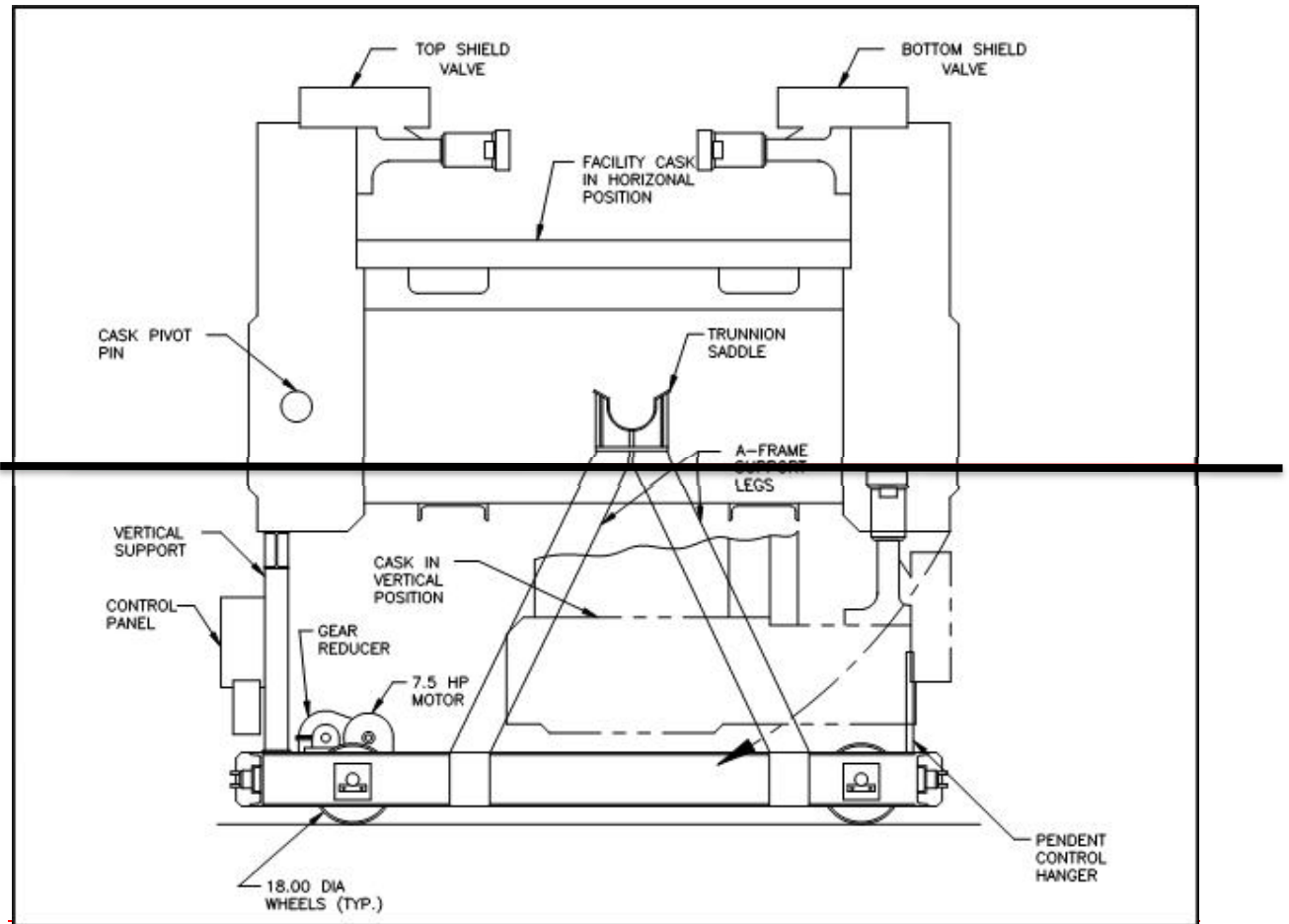


Figure A2-14  
Facility Cask Transfer Car (Side View)

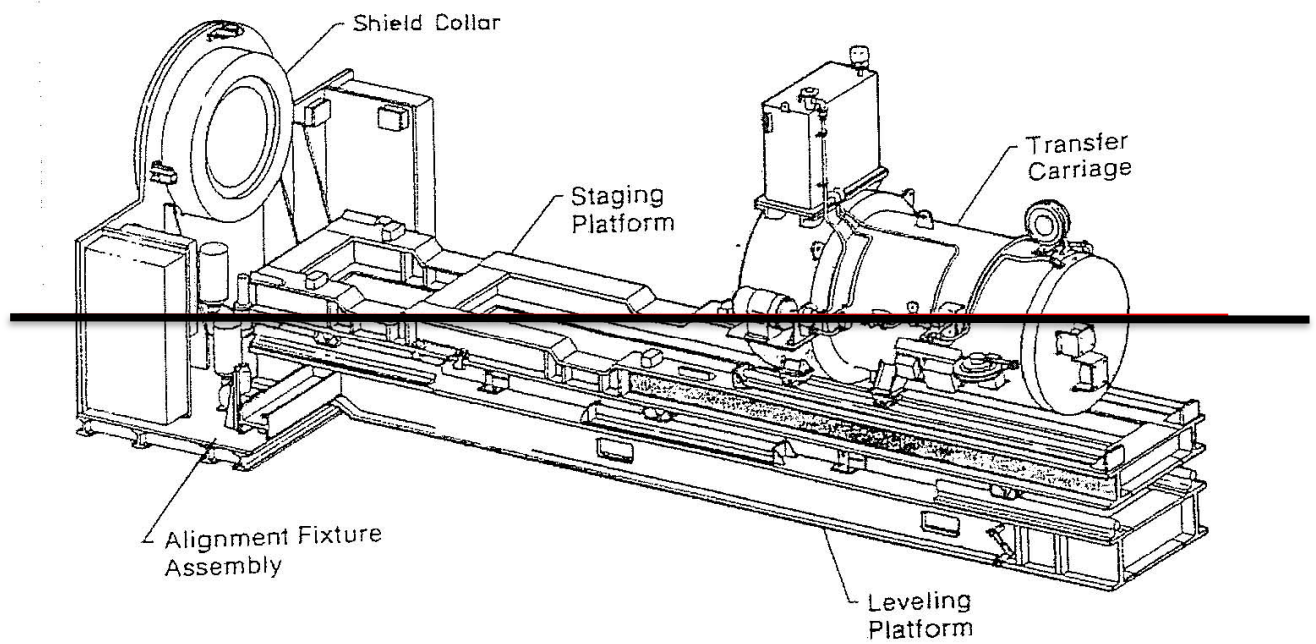


Figure A2-15  
Typical Emplacement Equipment



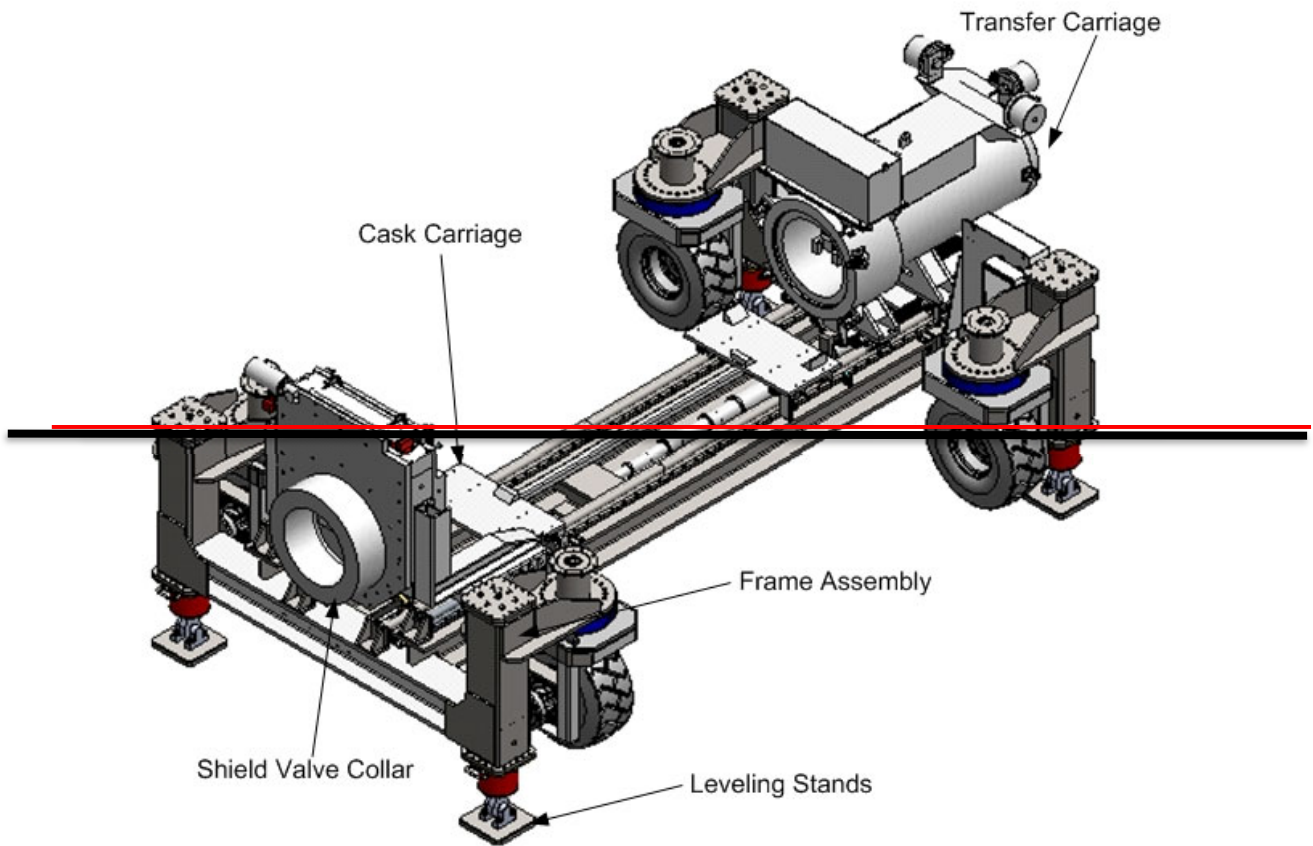


Figure A2-15a  
Typical Emplacement Equipment

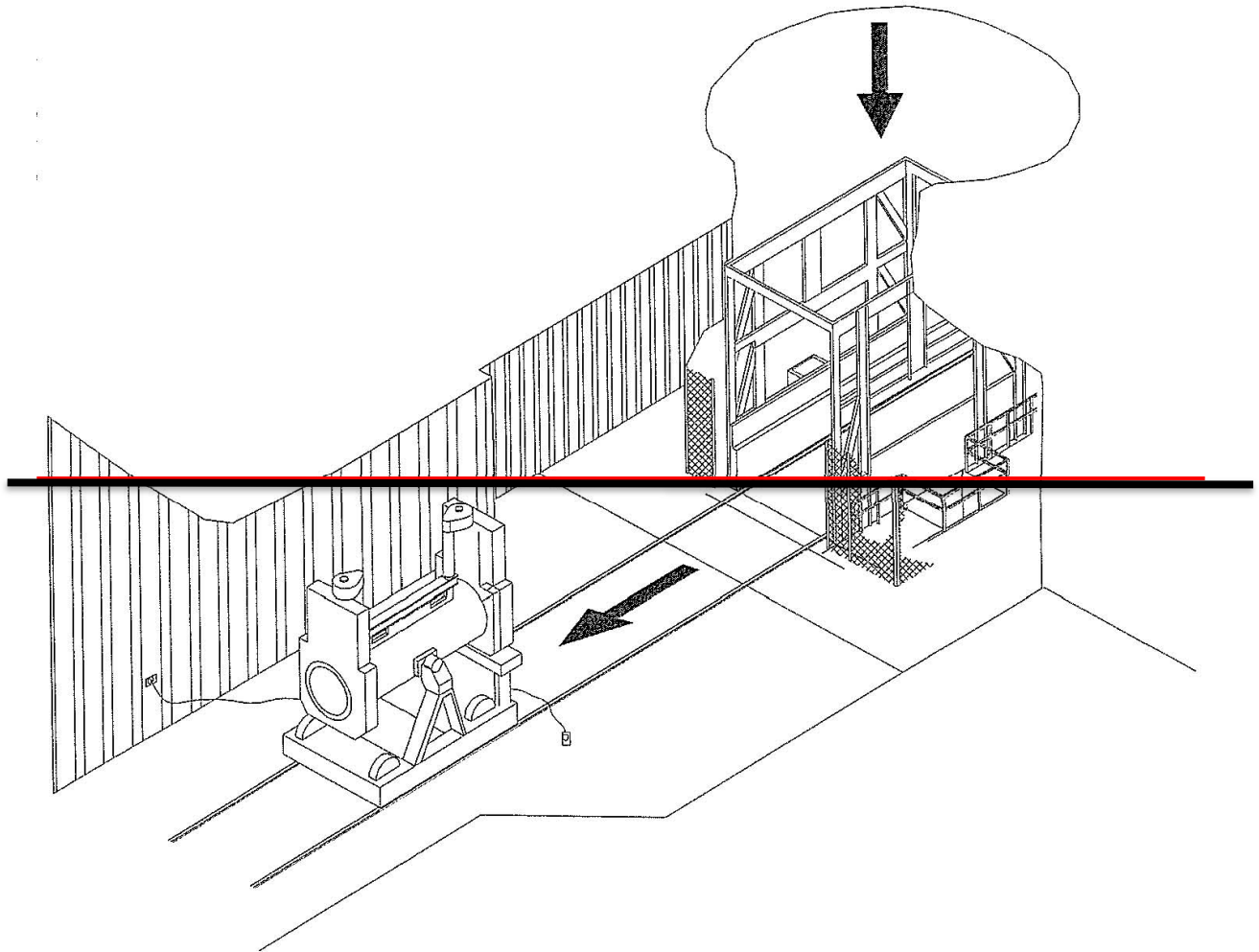


Figure A2-16  
RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance



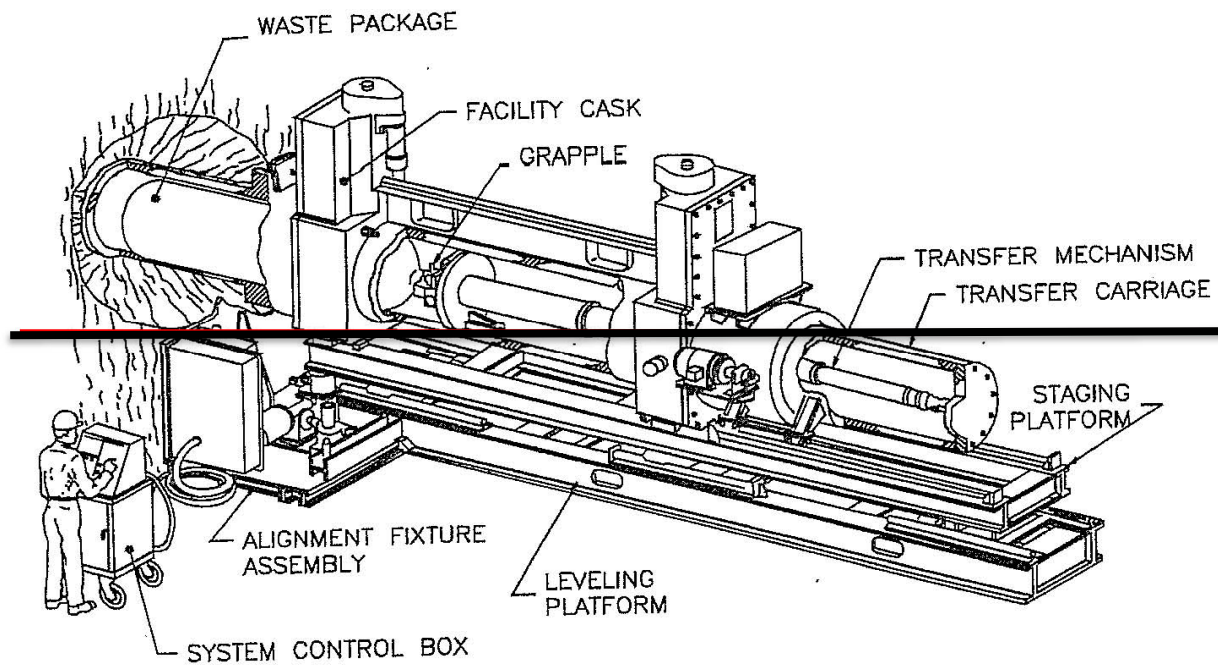


Figure A2-17  
Facility Cask Installed on the Typical Emplacement Equipment

FACILITY CASK AGAINST SHIELD COLLAR, TRANSFER CARRIAGE RETRACTED,  
SHIELD PLUG CARRIAGE ON STAGING PLATFORM, SHIELD PLUG BEING INSTALLED

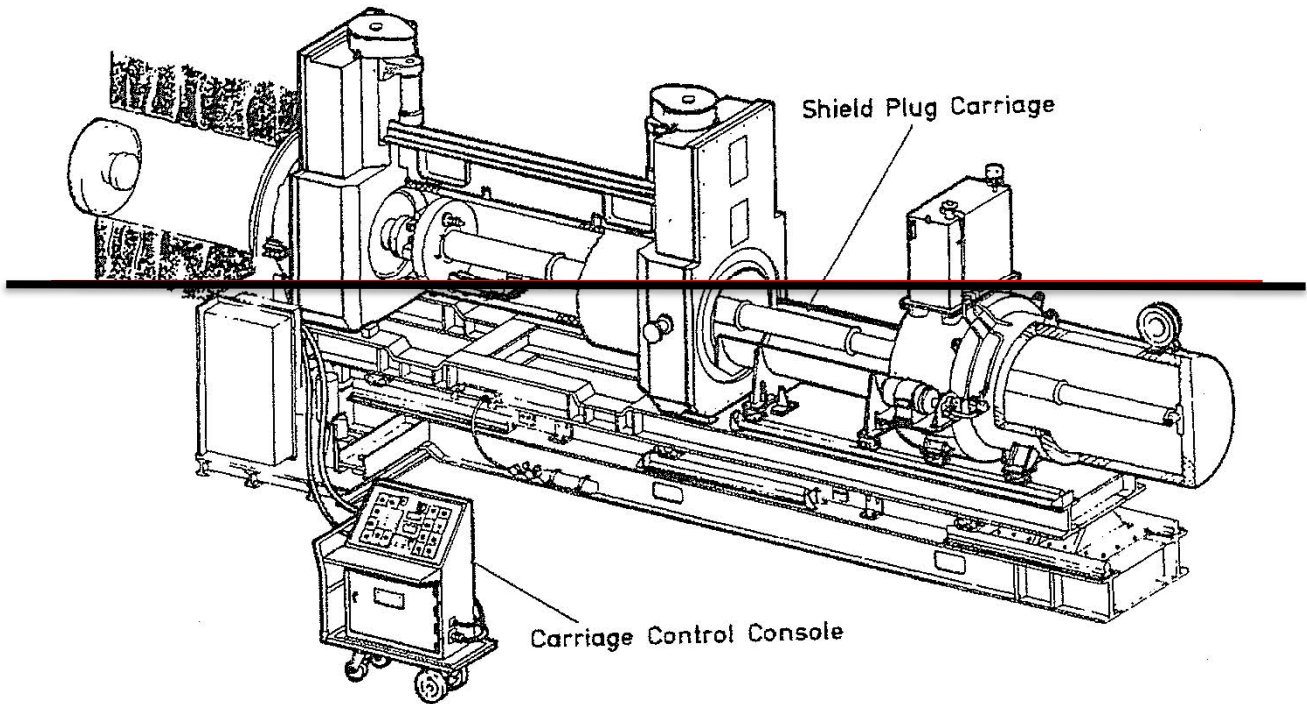


Figure A2-18  
Installing Shield Plug

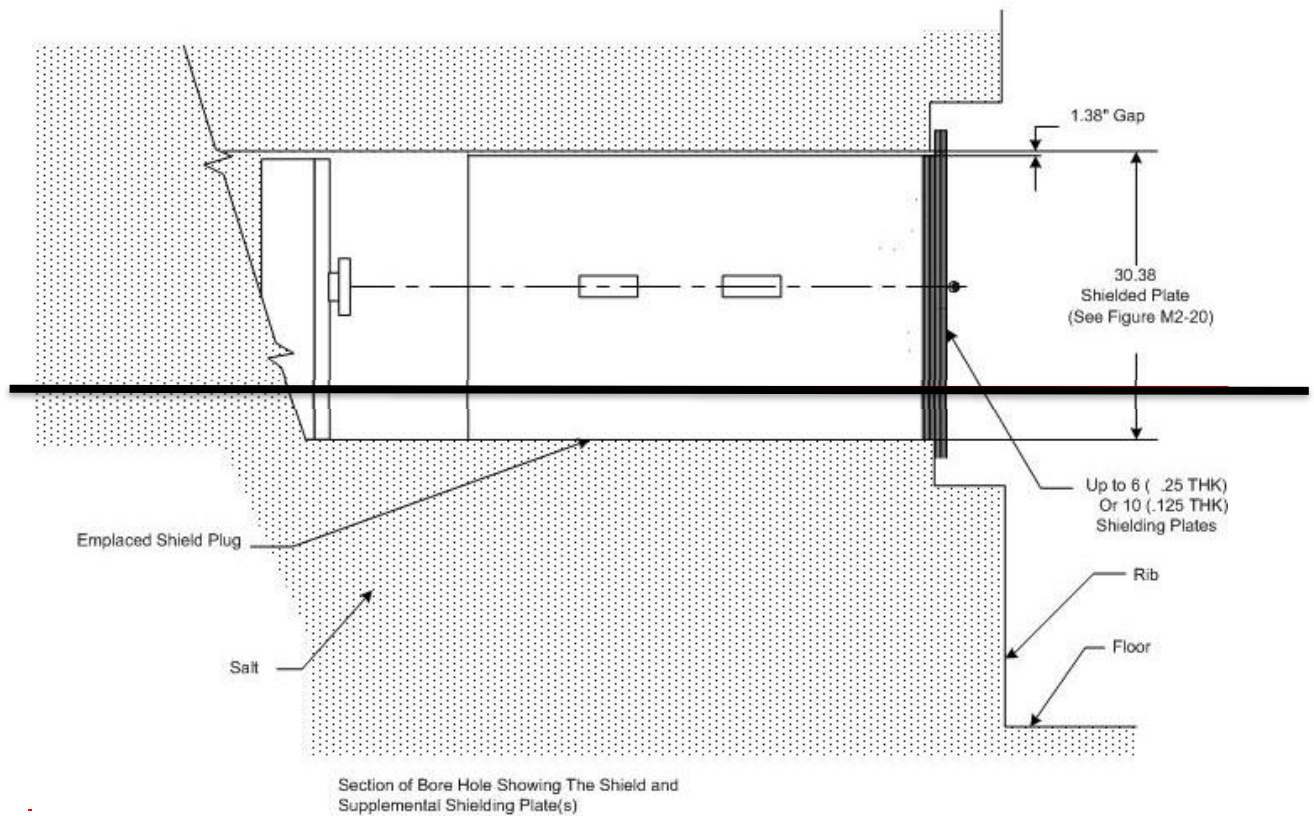


Figure A2-19  
Shield Plug Supplemental Shielding Plate(s)

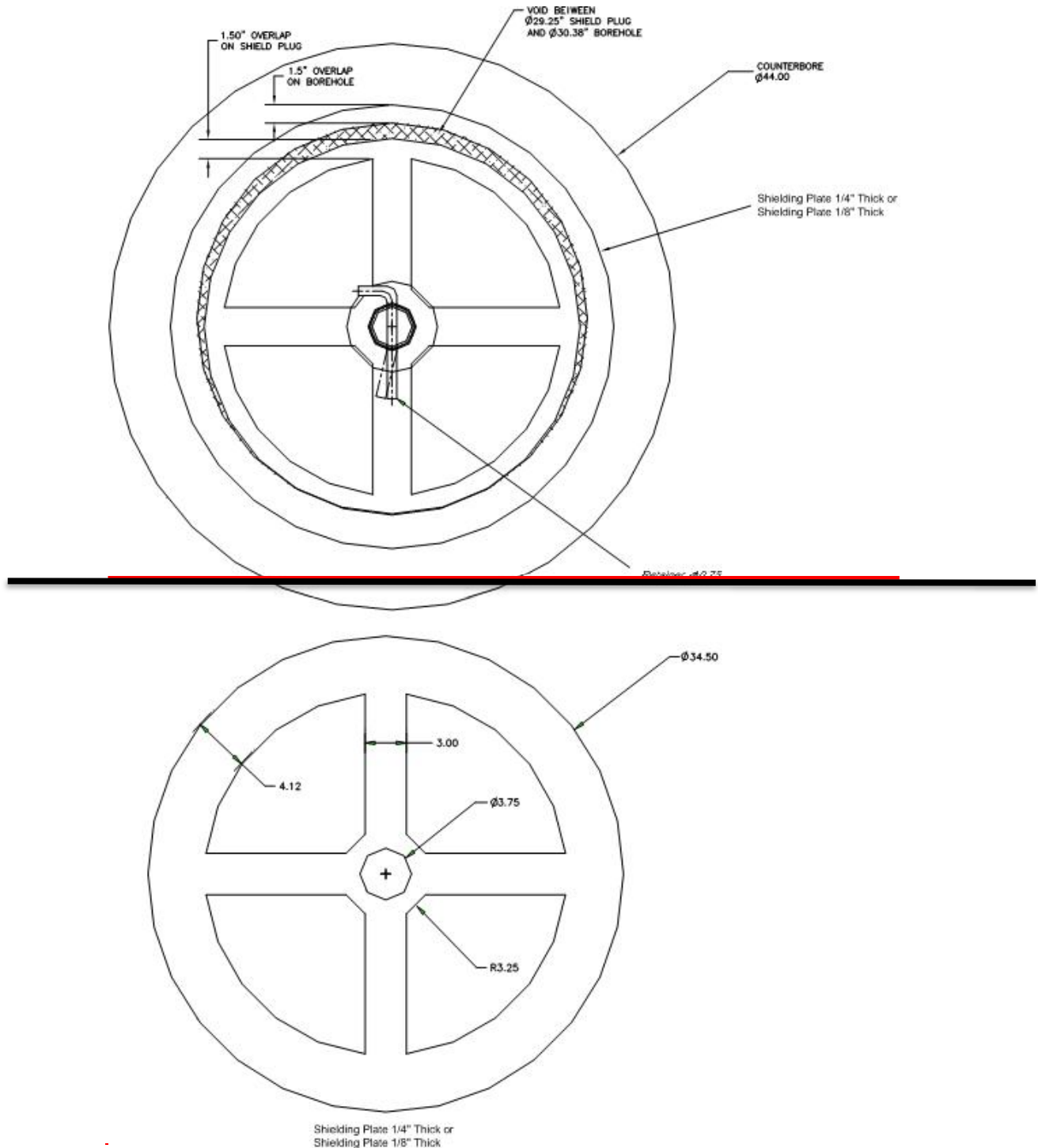


Figure A2-20  
 Shielding Layers to Supplement RH Borehole Shield Plugs

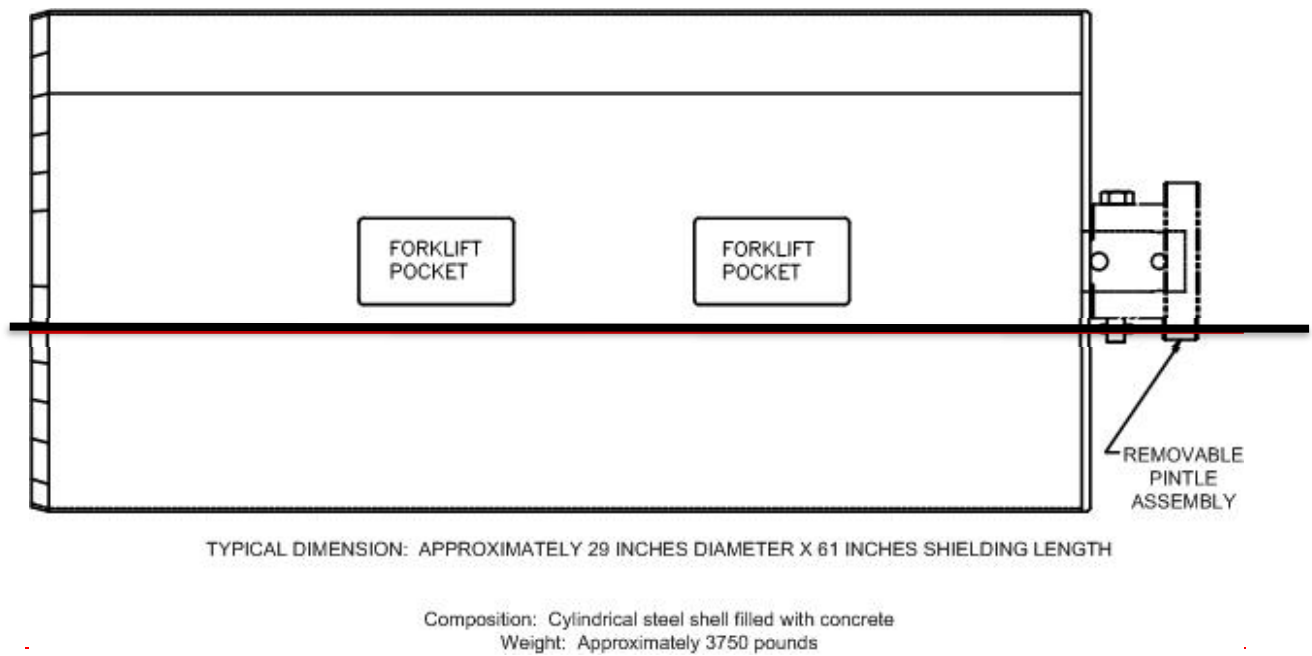


Figure A2-21  
Shield Plug Configuration

**ATTACHMENT A4A3**  
**TRAFFIC PATTERNS**

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**ATTACHMENT A4A3**

**TRAFFIC PATTERNS**

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**ATTACHMENT B**  
**HAZARDOUS WASTE PERMIT APPLICATION PART A**

## ATTACHMENT B

### HAZARDOUS WASTE PERMIT APPLICATION PART A

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United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
---	---

**1. Reason for Submittal** (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, $> 1$ kg of acute hazardous waste, or $> 100$ kg of acute hazardous waste spill cleanup in <b>one or more months of the reporting year</b> (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A (permit) Form

**2. Site EPA ID Number**

N	M	4	8	9	0	1	3	9	0	8	8
---	---	---	---	---	---	---	---	---	---	---	---

**3. Site Name**

Waste Isolation Pilot Plant
-----------------------------

**4. Site Location Address**

Street Address <b>34 Louis Whitlock Road</b>	
City, Town, or Village <b>Carlsbad</b>	County <b>Eddy</b>
State <b>NM</b>	Country <b>USA</b> Zip Code <b>88220</b>
Latitude <b>32.3697706</b>	Longitude <b>-103.7913501</b> <input type="checkbox"/> Use Lat/Long as Primary Address

**5. Site Mailing Address**

Same as Location Street Address

Street Address <b>P.O. Box 3090</b>	
City, Town, or Village <b>Carlsbad</b>	
State <b>NM</b>	Country <b>USA</b> Zip Code <b>88221</b>

**6. Site Land Type**

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input checked="" type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
----------------------------------	---------------------------------	-----------------------------------	---	---------------------------------	------------------------------------	--------------------------------	--------------------------------

**7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)**

A. (Primary) <b>56221</b>	C.
B.	D.

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**8. Site Contact Information**

Same as Location Address

First Name	<b>Reinhard</b>	MI	Last Name	<b>Knerr</b>	
Title	<b>Manager, Carlsbad Field Office (CBFO)</b>				
Street Address	<b>P.O. Box 3090</b>				
City, Town, or Village	<b>Carlsbad</b>				
State	<b>NM</b>	Country	<b>USA</b>	Zip Code	<b>88221</b>
Email	<b>Reinhard.Knerr@cbfo.doe.gov</b>				
Phone	<b>(575) 234-7300</b>	Ext	Fax	<b>(575) 234-7694</b>	

**9. Legal Owner and Operator of the Site**

**A. Name of Site's Legal Owner**

Same as Location Address

Full Name	<b>U.S. Department of Energy</b>	Date Became Owner (mm/dd/yyyy)	<b>5/18/1981</b>	
Owner Type	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
Street Address	<b>P.O. Box 3090</b>			
City, Town, or Village	<b>Carlsbad</b>			
State	<b>NM</b>	Country	<b>USA</b>	
Zip Code	<b>88221</b>			
Email	<b>Reinhard.Knerr@cbfo.doe.gov</b>			
Phone	<b>(575) 234-7300</b>	Ext	Fax	<b>(575) 234-7694</b>
Comments				

**B. Name of Site's Legal Operator**

Same as Location Address

Full Name	<b>U.S. Department of Energy</b>	Date Became Operator (mm/dd/yyyy)	<b>5/18/1981</b>	
Operator Type	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
Street Address	<b>P.O. Box 3090</b>			
City, Town, or Village	<b>Carlsbad</b>			
State	<b>NM</b>	Country	<b>USA</b>	
Zip Code	<b>88221</b>			
Email	<b>Reinhard.Knerr@cbfo.doe.gov</b>			
Phone	<b>(575) 234-7300</b>	Ext	Fax	<b>(575) 234-7694</b>
Comments	<b>See Item 18, Comments, for additional operator.</b>			

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**10. Type of Regulated Waste Activity (at your site)**

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities**

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c
<input checked="" type="checkbox"/>	a. LQG -Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<input type="checkbox"/>	b. SQG 100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Receives Hazardous Waste from Off-site
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5 Recycler of Hazardous Waste
<input type="checkbox"/>	a. Recycler who stores prior to recycling
<input type="checkbox"/>	b. Recycler who does not store prior to recycling
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.
<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption

**B. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

D004	D009	D021	D029	D035	D040	F004
D005	D010	D022	D030	D036	D043	F005
D006	D011	D026	D032	D037	F001	F006
D007	D018	D027	D033	D038	F002	F007
D008	D019	D028	D034	D039	F003	See Item 18

**C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes.** Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.


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**11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)**

**A. Other Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

**B. Universal Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input type="checkbox"/>	c. Mercury containing equipment
<input type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Aerosol Cans
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

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**D. Pharmaceutical Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

**12. Eligible Academic Entities with Laboratories**—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262, Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

**13. Episodic Generation**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
--	---

**14. LQG Consolidation of VSQG Hazardous Waste**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.
--	---

**15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
<input type="checkbox"/>	A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility
	B. Expected closure date: _____ mm/dd/yyyy
	C. Requesting new closure date: _____ mm/dd/yyyy
	D. Date closed : _____ mm/dd/yyyy
<input type="checkbox"/>	1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
<input type="checkbox"/>	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)



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**16. Notification of Hazardous Secondary Material (HSM) Activity**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
--	---

**17. Electronic Manifest Broker**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
--	--

**18. Comments** (include item number for each comment)

<b>Section 9.B (continued):</b> <b>Full Name: Nuclear Waste Partnership LLC</b> <b>Date Became Operator (mm/dd/yyyy): 10/01/2012</b> <b>Operator Type: Private</b> <b>Street Address: P.O. Box 2078</b> <b>City, Town, or Village: Carlsbad</b> <b>State: NM</b> <span style="margin-left: 150px;"><b>Country: USA</b></span> <span style="margin-left: 150px;"><b>Zip Code: 88221</b></span> <b>Email: Sean.Dunagan@wipp.ws</b> <b>Phone: (575) 234-7400</b> <span style="margin-left: 150px;"><b>Ext:</b></span> <span style="margin-left: 150px;"><b>Fax: (575) 234-7046</b></span>		
<b>Section 10.B (continued): F009, P015, P030, P098, P099, P106, P120, U002, U003, U019, U037, U043, U044, U052, U070, U072, U078, U079, U103, U105, U108, U122, U133, U134, U151, U154, U159, U196, U209, U210, U220, U226, U228, U239</b>		

**19. Certification** 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 fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
<b>Original Signature on File</b>	<b>1/31/2022</b>
Printed Name (First, Middle Initial Last)	Title
<b>Reinhard Knerr</b>	<b>Manager, Carlsbad Field Office (CBFO)</b>
Email	
<b>Reinhard.Knerr@cbfo.doe.gov</b>	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
<b>Original Signature on File</b>	<b>1/31/2022</b>
Printed Name (First, Middle Initial Last)	Title
<b>Sean Dunagan</b>	<b>Project Manager, Nuclear Waste Partnership LLC</b>
Email	
<b>Sean.Dunagan@wipp.ws</b>	



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United States Environmental Protection Agency HAZARDOUS WASTE PERMIT PART A FORM	
---	---

**1. Facility Permit Contact**

First Name <b>Same as Site Contact</b>	MI	Last Name
Title		
Email		
Phone	Ext	Fax

**2. Facility Permit Contact Mailing Address**

Street Address <b>Same as Site Mailing Address</b>		
City, Town, or Village		
State	Country	Zip Code

**3. Facility Existence Date (mm/dd/yyyy)**

5/18/1981
-----------

**4. Other Environmental Permits**

A. Permit Type	B. Permit Number	C. Description
		See Permit Attachment B, Appendix B1

**5. Nature of Business**

The Waste Isolation Pilot Plant (WIPP) is a U.S. Department of Energy facility for the receipt, unloading, and transfer of transuranic mixed waste from the surface of the site to the underground hazardous waste disposal units. Waste is emplaced in an underground geologic repository horizon located in a deep, bedded salt formation approximately 2,150 feet beneath the surface.

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**6. Process Codes and Design Capacities**

Line Number	A. Process Code				B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0 1	X	0	4		18000.00	C	002	Panels 1 and 2
0 2	X	0	4		18750.00	C	001	Panel 3
0 3	X	0	4		19106.00	C	001	Panel 4
0 4	X	0	4		19195.00	C	001	Panel 5
								See attached

**7. Description of Hazardous Wastes** (Enter codes for Items 7.A, 7.C and 7.D(1) )

Line No.	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes										(2) Process Description (if code is not entered in 7.D1)
							(1) Process Codes										
0 1	D	0	0	4	903	M	X	0	4	S	0	1	S	0	1		
0 2	D	0	0	5	484	M	X	0	4	S	0	1	S	0	1		
0 3	D	0	0	6	1819	M	X	0	4	S	0	1	S	0	1		
0 4	D	0	0	7	1248	M	X	0	4	S	0	1	S	0	1		
0 5	D	0	0	8	3246	M	X	0	4	S	0	1	S	0	1		
0 6	D	0	0	9	1727	M	X	0	4	S	0	1	S	0	1		
0 7	D	0	1	0	186	M	X	0	4	S	0	1	S	0	1		
0 8	D	0	1	1	1090	M	X	0	4	S	0	1	S	0	1		
0 9	D	0	1	8	749	M	X	0	4	S	0	1	S	0	1		
1 0	D	0	1	9	761	M	X	0	4	S	0	1	S	0	1		
																See attached	

**8. Map**

Attach to this application a topographical 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 intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

**9. Facility Drawing**

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

**10. 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.

**11. Comments**

See Hazardous Waste Permit Part A Form, Narrative to Item 6. Process Codes and Design Capacities.

- 1 EPA ID Number: NM4890139088
- 2 Hazardous Waste Permit Part A Form
- 3 6. Process Codes and Design Capacities (continued)

Line Numbers	A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
				(1) Amount	(2) Unit of Measure		
5	X	0	4	19284.00	C	001	Panel 6
6	X	0	4	19400.00	C	00 <del>4</del> <u>2</u>	Panels 7, <del>and 8,</del> <u>11 and 12</u>
7	S	0	1	194.1	C	001	Waste Handling Building Unit
8	S	0	1	242.0	C	001	Parking Area Unit

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Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities

The Waste Isolation Pilot Plant (WIPP) geologic repository is defined as a “miscellaneous unit” under 40 CFR §260.10: *“Miscellaneous unit” means a hazardous waste management unit where hazardous waste is treated, stored, or disposed of and that is not a container, tank, surface impoundment, waste pile, land treatment unit, landfill, incinerator, ~~containment building, boiler, industrial furnace, or~~ underground injection well with appropriate technical standards under ~~part 40 CFR Part~~ 146 of this chapter, containment building, corrective action management unit, or unit eligible for research, development, and demonstration permit under 40 CFR §270.65 or staging pile. The WIPP facility is a geologic repository designed for the disposal of defense-generated transuranic (TRU) waste. Some of the TRU wastes disposed of at the WIPP contain hazardous wastes as co-contaminants. More than half the waste to be disposed of at the WIPP facility also meets the definition of debris waste. The debris categories include manufactured goods, biological materials, and naturally occurring geological materials. ~~Approximately 70 percent of waste anticipated for disposal in the WIPP repository is categorized as debris waste.~~The WIPP facility geologic repository has been divided into ~~twelve~~ten discrete hazardous waste ~~disposal~~management units (HWDMUs), ~~ten~~eight of which are permitted for disposal under 40 CFR Part 264, Subpart X, Miscellaneous Units.*

For purposes of this application, all TRU waste is managed as though it were mixed. During the Disposal Phase of the facility, ~~which is expected to last 25 years,~~ the emplaced TRU mixed waste volume will not exceed the design capacity specified in Item 6, *Process Codes and Design Capacities*. This volume is calculated based on the gross internal volumes of the outermost disposal containers and cannot exceed ~~189,935,454,135~~ 189,935,454,135 m<sup>3</sup> for Panels 1 through 8, 11 and 12. The Land Withdrawal Act (LWA) TRU waste volume is tracked and reported by the DOE, internally, for the purposes of compliance with the WIPP LWA total capacity limit for TRU waste of 6.2 million cubic feet<sup>3</sup> (175,564 m<sup>3</sup>), and is included for informational purposes in Permit Part 4, Table 4.1.1.

The process design capacities for each of the ~~ten~~eight underground HWDMUs in the geologic repository (i.e., miscellaneous unit) are shown in Item 6, *Process Codes and Design Capacities*. In addition, two Hazardous Waste Management Units (HWMUs) have been designated as container storage units (S01) in Item 6, *Process Codes and Design Capacities*. One is inside the Waste Handling Building (WHB) and consists of the ~~Container~~Handled (CH) ~~Bay~~, ~~Waste~~Shaft ~~Conveyance~~ Loading ~~Room~~, ~~Waste~~Shaft ~~Conveyance~~ Entry ~~Room~~, ~~Remote-Handled (RH) Bay~~, ~~Cask~~Unloading ~~Room~~, ~~Hot~~ Cell, ~~Transfer~~ Cell, and ~~Facility~~ Cask ~~Loading~~ ~~Room~~. This HWMU will be used for waste receipt, handling, and storage (including storage of derived waste) prior to emplacement in the underground geologic repository. No treatment or disposal will occur in this S01 HWMU. The capacity of this S01 unit for storage is 194.1 m<sup>3</sup>, based on 36 ten-drum overpacks on 18 facility pallets, four CH Packages at the TRUDOCKs, one standard waste box of derived waste, two loaded casks and one 55-gallon drum of derived waste in the RH Bay, one loaded cask in the Cask Unloading Room, 13 55-gallon drums in the Hot Cell, one canister in the Transfer Cell and one canister in the Facility Cask Unloading Room. The second S01 HWMU is the parking area outside the WHB where the ~~CH~~Container- and ~~RH~~Remote-Handled Package trailers and the road cask trailers will be parked awaiting waste handling operations. The capacity of this unit is 50 ~~CH~~Container-Handled

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Packages and twelve ~~RH~~Remote-Handled Packages with a combined TRU mixed waste volume of 242 m<sup>3</sup>.

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Hazardous Waste Permit Part A Form

Narrative to Item 6. Process Codes and Design Capacities (continued)

The HWMUs are shown in Appendix B3~~Figures B3-2, B3-3, and B3-4.~~

~~ADuring the ten-year period of the permit, a~~ CH TRU mixed waste volume of up to ~~186,000~~148,500 m<sup>3</sup> could be emplaced in Panels 1 to 8, 11 and 12 and an RH TRU mixed waste volume up to ~~3,935~~2,635 m<sup>3</sup> could be emplaced in Panels 4 to 8, 11 and 12 for a total of ~~189,935~~151,135 m<sup>3</sup>, as shown in Item 6, *Process Codes and Design Capacities*. ~~Panels 9 and 10 will be constructed under the initial term of this permit. These latter areas will not receive waste for disposal under this permit.~~

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2 Hazardous Waste Permit Part A Form

3 7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)-) (continued)

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes								(2) Process Description (if code is not entered in 7.D1))	
								(1) Process Codes									
1	1	D	0	2	1	26	M	X	0	4	S	0	1	S	0	1	
1	2	D	0	2	2	1098	M	X	0	4	S	0	1	S	0	1	
1	3	D	0	2	6	609	M	X	0	4	S	0	1	S	0	1	
1	4	D	0	2	7	26	M	X	0	4	S	0	1	S	0	1	
1	5	D	0	2	8	449	M	X	0	4	S	0	1	S	0	1	
1	6	D	0	2	9	478	M	X	0	4	S	0	1	S	0	1	
1	7	D	0	3	0	26	M	X	0	4	S	0	1	S	0	1	
1	8	D	0	3	2	26	M	X	0	4	S	0	1	S	0	1	
1	9	D	0	3	3	344	M	X	0	4	S	0	1	S	0	1	
2	0	D	0	3	4	26	M	X	0	4	S	0	1	S	0	1	
2	1	D	0	3	5	139	M	X	0	4	S	0	1	S	0	1	
2	2	D	0	3	6	26	M	X	0	4	S	0	1	S	0	1	
2	3	D	0	3	7	26	M	X	0	4	S	0	1	S	0	1	
2	4	D	0	3	8	26	M	X	0	4	S	0	1	S	0	1	
2	5	D	0	3	9	26	M	X	0	4	S	0	1	S	0	1	
2	6	D	0	4	0	140	M	X	0	4	S	0	1	S	0	1	
2	7	D	0	4	3	26	M	X	0	4	S	0	1	S	0	1	
2	8	F	0	0	1	1891	M	X	0	4	S	0	1	S	0	1	
2	9	F	0	0	2	1860	M	X	0	4	S	0	1	S	0	1	
3	0	F	0	0	3	1593	M	X	0	4	S	0	1	S	0	1	
3	1	F	0	0	4	26	M	X	0	4	S	0	1	S	0	1	
3	2	F	0	0	5	1829	M	X	0	4	S	0	1	S	0	1	
3	3	F	0	0	6	915	M	X	0	4	S	0	1	S	0	1	
3	4	F	0	0	7	915	M	X	0	4	S	0	1	S	0	1	
3	5	F	0	0	9	915	M	X	0	4	S	0	1	S	0	1	
3	6	P	0	1	5	945	M	X	0	4	S	0	1	S	0	1	
3	7	P	0	3	0	344	M	X	0	4	S	0	1	S	0	1	
3	8	P	0	9	8	344	M	X	0	4	S	0	1	S	0	1	
3	9	P	0	9	9	344	M	X	0	4	S	0	1	S	0	1	
4	0	P	1	0	6	344	M	X	0	4	S	0	1	S	0	1	
4	1	P	1	2	0	344	M	X	0	4	S	0	1	S	0	1	
4	2	U	0	0	2	344	M	X	0	4	S	0	1	S	0	1	
4	3	U	0	0	3	344	M	X	0	4	S	0	1	S	0	1	
4	4	U	0	1	9	344	M	X	0	4	S	0	1	S	0	1	
4	5	U	0	3	7	344	M	X	0	4	S	0	1	S	0	1	

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2 Hazardous Waste Permit Part A Form

3 7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)-) (continued)

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes								(2) Process Description (if code is not entered in 7.D1))	
								(1) Process Codes									
4	6	U	0	4	3	344	M	X	0	4	S	0	1	S	0	1	
4	7	U	0	4	4	344	M	X	0	4	S	0	1	S	0	1	
4	8	U	0	5	2	344	M	X	0	4	S	0	1	S	0	1	
4	9	U	0	7	0	344	M	X	0	4	S	0	1	S	0	1	
5	0	U	0	7	2	344	M	X	0	4	S	0	1	S	0	1	
5	1	U	0	7	8	344	M	X	0	4	S	0	1	S	0	1	
5	2	U	0	7	9	344	M	X	0	4	S	0	1	S	0	1	
5	3	U	1	0	3	344	M	X	0	4	S	0	1	S	0	1	
5	4	U	1	0	5	344	M	X	0	4	S	0	1	S	0	1	
5	5	U	1	0	8	344	M	X	0	4	S	0	1	S	0	1	
5	6	U	1	2	2	344	M	X	0	4	S	0	1	S	0	1	
5	7	U	1	3	3	344	M	X	0	4	S	0	1	S	0	1	
5	8	U	1	3	4	344	M	X	0	4	S	0	1	S	0	1	
5	9	U	1	5	1	344	M	X	0	4	S	0	1	S	0	1	
6	0	U	1	5	4	344	M	X	0	4	S	0	1	S	0	1	
6	1	U	1	5	9	344	M	X	0	4	S	0	1	S	0	1	
6	2	U	1	9	6	344	M	X	0	4	S	0	1	S	0	1	
6	3	U	2	0	9	344	M	X	0	4	S	0	1	S	0	1	
6	4	U	2	1	0	344	M	X	0	4	S	0	1	S	0	1	
6	5	U	2	2	0	344	M	X	0	4	S	0	1	S	0	1	
6	6	U	2	2	6	344	M	X	0	4	S	0	1	S	0	1	
6	7	U	2	2	8	344	M	X	0	4	S	0	1	S	0	1	
6	8	U	2	3	9	344	M	X	0	4	S	0	1	S	0	1	



1 NM4890139088

2 **RCRA PART A APPLICATION CERTIFICATION**

3 The U.S. Department of Energy (DOE), through its Carlsbad Field Office, has signed as “owner  
4 and operator,” and Nuclear Waste Partnership LLC, the Management and Operating Contractor  
5 (MOC), has signed this application for the permitted facility as “co-operator.”

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

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

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

17 For purposes of the certification required by Title 20 of the New Mexico Administrative  
18 Code, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, §270.11(d), the DOE’s and the  
19 MOC’s representatives certify, under penalty of law that this document and all attachments  
20 were prepared under their direction or supervision in accordance with a system designed  
21 to assure that qualified personnel properly gather and evaluate the information submitted.  
22 Based on their inquiry of the person or persons who manage the system, or those persons  
23 directly responsible for gathering the information, the information submitted is, to the best  
24 of their knowledge and belief, true, accurate, and complete for their respective areas of  
25 responsibility. We are aware that there are significant penalties for submitting false  
26 information, including the possibility of fine and imprisonment for knowing violations.

27 Owner and Operator Signature: Original signed by Reinhard Knerr  
28 Title: Manager, Carlsbad Field Office (CBFO)  
29 for: U.S. Department of Energy  
30 Date: 1/31/2022

31 Co-Operator Signature: Original signed by Sean Dunagan  
32 Title: Project Manager  
33 for: Nuclear Waste Partnership LLC  
34 Date: 1/31/2022  
35

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**APPENDIX B1  
OTHER ENVIRONMENTAL PERMITS**

1

**Active Environmental Permits and Approvals for the Waste Isolation Pilot Plant as of January 2022**

	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
1.	Department of the Interior, Bureau of Land Management	Right-of-Way for Domestic Water Pipeline	NM053809	05/15/06 (City of Carlsbad, NM)	In Perpetuity	Active
2.	Department of the Interior, Bureau of Land Management	Right-of-Way for the North Access Road	NM055676	08/23/83	In Perpetuity	Active
3.	Department of the Interior, Bureau of Land Management	Right-of-Way for WIPP Railroad Spur and Maintenance Road	NM055699	09/27/83	In Perpetuity	Active
4.	Department of the Interior, Bureau of Land Management	Right-of-Way for Dosimetry and Aerosol Sampling Sites	NM063136	07/03/86	12/31/40	Active
5.	Department of the Interior, Bureau of Land Management	Right-of-Way for Seven Subsidence Monuments	NM065801	11/07/86	None	Active
6.	Department of the Interior, Bureau of Land Management	Right-of-Way for telephone cable	NM046092	09/04/81 (Valor Telecom)	12/31/40	Active
7.	Department of the Interior, Bureau of Land Management	Right-of-Way for 115 KV Electric Transmission Line	NM043203	10/19/81 (Xcel Energy)	12/31/40	Active
8.	Department of the Interior, Bureau of Land Management	Right-of-Way for South Access Road (includes Rally Point)	NM123703	01/27/10	12/31/39	Active
9.	Department of the Interior, Bureau of Land Management	Right-of-Way for Mosaic (Duval Mine Site-Nash Draw) telephone line	NM060174	03/08/85 (Valor Telecom)	03/08/35	Active
10.	Department of the Interior, Bureau of Land Management	Right-of-Way for groundwater monitor wells/pads	NM108365	08/30/02	08/30/32	Active
11.	Department of the Interior, Bureau of Land Management	Right-of-Way for Monitoring Well C-2664 (Cabin Baby)	NM107944	04/23/02	04/23/32	Active
12.	Department of the Interior, Bureau of Land Management	Right-of-Way for Wells C-2725 (H-4A), C-2775 (H-4B), & C-2776 (H-4C)	NM-6-5 Cooperative Agreement	04/27/78	None	Active
13.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for accessing state trust lands in Eddy & Lea Counties	RW-25430	09/28/04	10/31/18	Active Renewal in Process

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	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
14.	Department of Interior, Bureau of Land Management	Right of Way for Buried Fiber Optics Line	NM113339	08/09/05 (Valor Telecom)	12/31/34	Active
15.	Department of Interior, Bureau of Land Management	Right of Way for South Access Road Fence	NM094304	03/15/95	None	Active
16.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way for Dosimetry and Aerosol Sampling Sites, Angel Ranch	RW-22789	10/03/85	10/03/20	Active Renewal in Process
17.	New Mexico Environment Department Groundwater Quality Bureau	Discharge Permit	DP-831	12/30/2021	12/30/2026	Active
18.	New Mexico Environment Department Air Quality Bureau	Operating Permit for two backup diesel generators	310-M-2	12/07/93	None	Active
19.	New Mexico Environment Department Petroleum Storage Tank Bureau	Petroleum Storage Tank Registration Certificate	Registration Number 2179 Facility Number 31539	07/01/21	06/30/22	Active
20.	Office of New Mexico State Engineer	Monitoring Well C-2811	C-2811	03/02/01	None	Active
21.	Office of New Mexico State Engineer	WQSP-1 Well	C-2413	10/21/96	None	Active
22.	Office of New Mexico State Engineer	WQSP-2 Well	C-2414	10/21/96	None	Active
23.	Office of New Mexico State Engineer	WQSP-3 Well	C-2415	10/21/96	None	Active
24.	Office of New Mexico State Engineer	WQSP-4 Well	C-2416	10/21/96	None	Active
25.	Office of New Mexico State Engineer	WQSP-5 Well	C-2417	10/21/96	None	Active
26.	Office of New Mexico State Engineer	WQSP-6 Well	C-2418	10/21/96	None	Active
27.	Office of New Mexico State Engineer	WQSP-6a Well	C-2419	10/21/96	None	Active

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	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
28.	Office of New Mexico State Engineer	Monitoring Well CB-1	C-2664	07/30/99	None	Active
29.	Office of New Mexico State Engineer	Monitoring Well DOE-2	C-2682	04/17/00	None	Active
30.	Office of New Mexico State Engineer	Monitoring Well ERDA-9	C-2752	11/06/00	None	Active
31.	Office of New Mexico State Engineer	Monitoring Well H-2b1	C-2758	11/06/00	None	Active
32.	Office of New Mexico State Engineer	Monitoring Well H-3b1	C-2764	11/06/00	None	Active
33.	Office of New Mexico State Engineer	Monitoring Well H-3d	C-3207	11/06/00	None	Active
34.	Office of New Mexico State Engineer	Monitoring Well H-4c	C-2776	11/06/00	None	Active
35.	Office of New Mexico State Engineer	Monitoring Well H-5bR	C-2745-POD2	02/07/19	None	Active
36.	Office of New Mexico State Engineer	Monitoring Well H-6c	C-2750	11/06/00	None	Active
37.	Office of New Mexico State Engineer	Monitoring Well H-8a	C-2780	11/06/00	None	Active
38.	Office of New Mexico State Engineer	Monitoring Well H-9c	C-2784	11/06/00	None	Active
39.	Office of New Mexico State Engineer	Monitoring Well H-10a	C-2779	11/06/00	None	Active
40.	Office of New Mexico State Engineer	Monitoring Well H-11b2	C-2687	04/17/00	None	Active
41.	Office of New Mexico State Engineer	Monitoring Well H-14	C-2766	11/06/00	None	Active
42.	Office of New Mexico State Engineer	Monitoring Well H-15	C-2685	04/17/00	None	Active
43.	Office of New Mexico State Engineer	Monitoring Well H-16	C-2753	11/06/00	None	Active

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	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
44.	Office of New Mexico State Engineer	Monitoring Well H-18	C-2683	04/17/00	None	Active
45.	Office of New Mexico State Engineer	Monitoring Well H-19b0	C-2420	01/25/95	None	Active
46.	Office of New Mexico State Engineer	Monitoring Well H-19b2	C-2421	01/25/95	None	Active
47.	Office of New Mexico State Engineer	Monitoring Well H-19b3	C-2422	01/25/95	None	Active
48.	Office of New Mexico State Engineer	Monitoring Well H-19b4	C-2423	01/25/95	None	Active
49.	Office of New Mexico State Engineer	Monitoring Well H-19b5	C-2424	01/25/95	None	Active
50.	Office of New Mexico State Engineer	Monitoring Well H-19b6	C-2425	01/25/95	None	Active
51.	Office of New Mexico State Engineer	Monitoring Well H-19b7	C-2426	01/25/95	None	Active
52.	Office of New Mexico State Engineer	Monitoring Well WIPP-18	C-2684	04/17/00	None	Active
53.	Office of New Mexico State Engineer	Monitoring Well H-6bR	C-3362	12/27/07	None	Active
54.	Office of New Mexico State Engineer	Monitoring Well H-15R	C-3361	12/27/07	None	Active
55.	Office of New Mexico State Engineer	Monitoring Well SNL-2	C-2948	02/14/03	None	Active
56.	Office of New Mexico State Engineer	Monitoring Well SNL-9	C-2950	02/14/03	None	Active
57.	Office of New Mexico State Engineer	Monitoring Well SNL-12	C-2954	02/25/03	None	Active
58.	Office of New Mexico State Engineer	Monitoring Well SNL-1	C-2953	02/25/03	None	Active
59.	Office of New Mexico State Engineer	Monitoring Well SNL-3	C-2949	02/14/03	None	Active

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	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
60.	Office of New Mexico State Engineer	Monitoring Well SNL-5	C-3002	10/01/03	None	Active
61.	Office of New Mexico State Engineer	Monitoring Well IMC-461	C-3015	11/25/03	None	Active
62.	Office of New Mexico State Engineer	Monitoring Well SNL-10	C-3221	07/26/05	None	Active
63.	Office of New Mexico State Engineer	Monitoring Well SNL-16	C-3220	07/26/05	None	Active
64.	Office of New Mexico State Engineer	Monitoring Well SNL-17	C-3222	07/26/05	None	Active
65.	US Environmental Protection Agency Region 6	Conditions of Approval for Disposal of PCB/TRU and PCB/TRU Mixed Waste at the US Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Carlsbad, New Mexico	N/A	03/19/18	03/19/23	Active
66.	US Fish and Wildlife Service	Special Purpose – Relocate	MB155189-0	05/21/20	03/31/23	Active
67.	New Mexico Department of Game and Fish	Biotic Collection Permit	Authorization # 3293	03/02/20	12/31/22	Active
68.	Office of New Mexico State Engineer	Monitoring Well H-4bR	C-3404	01/13/09	None	Active
69.	Office of New Mexico State Engineer	Monitoring Well H-9bR	C-2783-POD2	07/14/10	None	Active
70.	Office of New Mexico State Engineer	Monitoring Well C-2737	C-2737	09/27/00	None	Active
71.	Office of New Mexico State Engineer	Monitoring Well WIPP-11R	C3112-POD2	02/07/19	None	Active
72.	Office of New Mexico State Engineer	Monitoring Well SNL-6	C-3151	02/10/05	None	Active
73.	Office of New Mexico State Engineer	Monitoring Well SNL-8	C-3150	02/10/05	None	Active

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	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
74.	Office of New Mexico State Engineer	Monitoring Well SNL-13	C-3139	12/17/04	None	Active
75.	Office of New Mexico State Engineer	Monitoring Well SNL-14	C-3140	12/17/04	None	Active
76.	Office of New Mexico State Engineer	Monitoring Well SNL-15	C-3152	02/10/05	None	Active
77.	Office of New Mexico State Engineer	Monitoring Well SNL-18	C-3233	10/06/05	None	Active
78.	Office of New Mexico State Engineer	Monitoring Well SNL-19	C-3234	10/06/05	None	Active
79.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-18 and SNL-19 well pads	NM115315	03/21/06	12/31/35	Active
80.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-11 and SNL-5 well pads and road access	NM110735	10/16/03	10/16/33	Active
81.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-12 well pad	NM109176	04/15/03	04/15/33	Active
82.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-9 well pad	NM109175	04/15/03	04/15/33	Active
83.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-2 well pad	NM109174	04/15/03	04/15/33	Active
84.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for SNL-1 Access Road	NM109177	06/17/03	06/17/33	Active
85.	Department of the Interior, Bureau of Land Management	Right-of-Way for 69KV Electric Distribution Line	NM091163	02/16/94 (Xcel Energy)	02/15/24	Active
86.	Office of New Mexico State Engineer	Monitoring Well H-11b4R	C-2769-POD2	05/16/11	None	Active
87.	Office of New Mexico State Engineer	Monitoring Well AEC-7R	C-3635-POD1	04/24/13	None	Active
88.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-1 Access Road and well pad	RW-28535	08/27/03	08/27/38	Active
89.	New Mexico State Land Office Commissioner of Public Lands	Right-of-Way easement for SNL-3 Access Road and well pad	RW-28537	08/27/03	08/27/38	Active



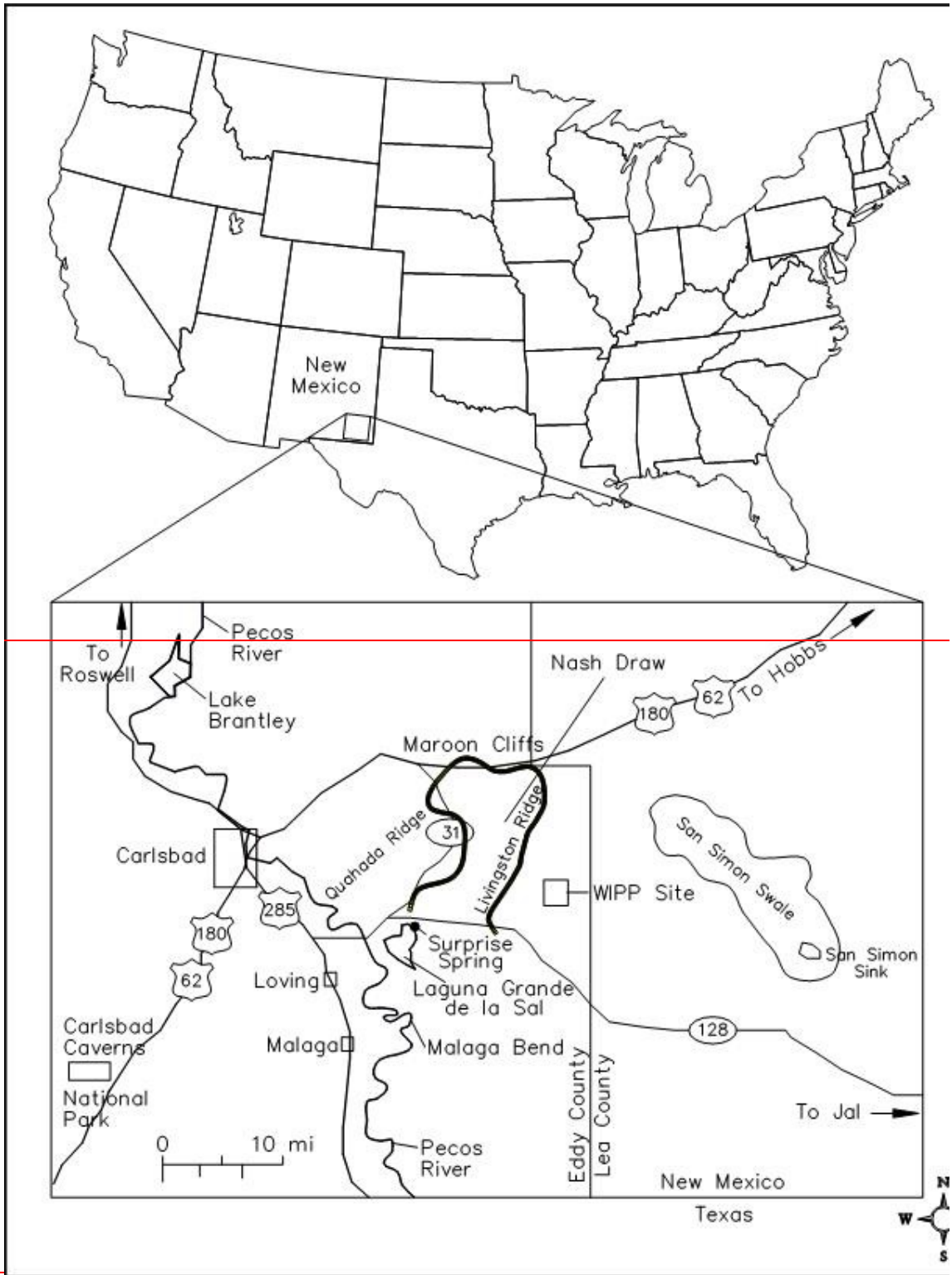
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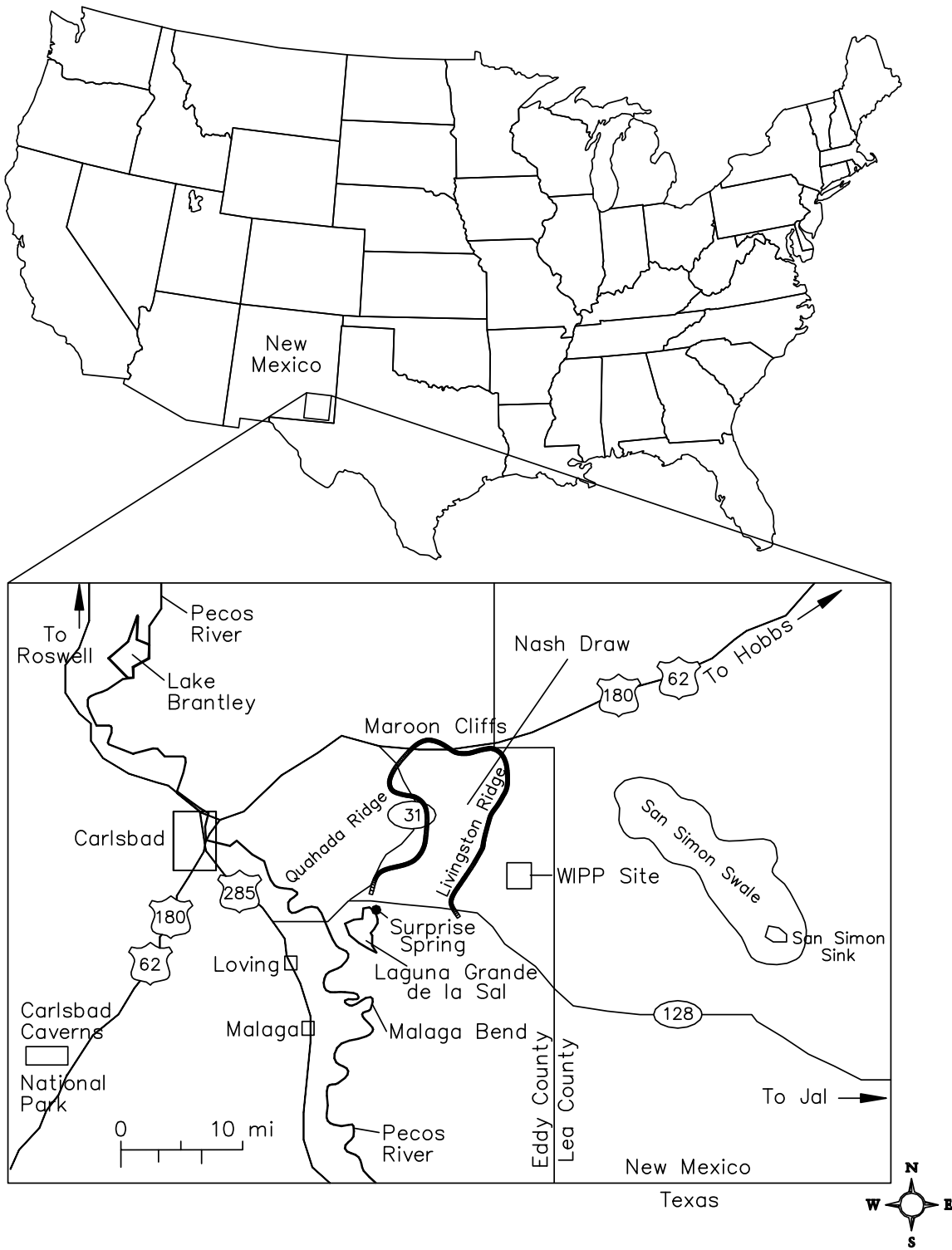
	<b>Granting Agency</b>	<b>Type of Permit</b>	<b>Permit/Right of Way Number</b>	<b>Granted/ Submitted *</b>	<b>Expiration</b>	<b>Current Permit Status</b>
90.	Office of New Mexico State Engineer	Monitoring Well H-12R	C-3749 POD1	06/24/14	None	Active
91.	Department of the Interior, Bureau of Land Management	Right-of-Way grant for H-12R Access Road and well pad	NM-131916	06/19/14	12/31/43	Active
92.	Office of New Mexico State Engineer	Monitoring Well H-10cR	C-3851-POD1	07/09/15	None	Active
93.	New Mexico State Land Office	Water Monitoring Easement for SNL-1	WM-120	07/20/18	08/21/22	Active
94.	New Mexico State Land Office	Water Monitoring Easement for SNL-3	WM-119	07/20/18	08/21/22	Active
95.	U.S. Department of the Interior, Bureau of Land Management	Seismic Monitoring Stations	NM-120413	07/10/08	12/31/37	Active
96.	New Mexico Environment Department	NSR Streamline, Level 1, Minor Source, Air Permit	310-M3	07/12/19	None	Active

1 \*Non DOE grantee is noted

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**APPENDIX B2  
MAPS**

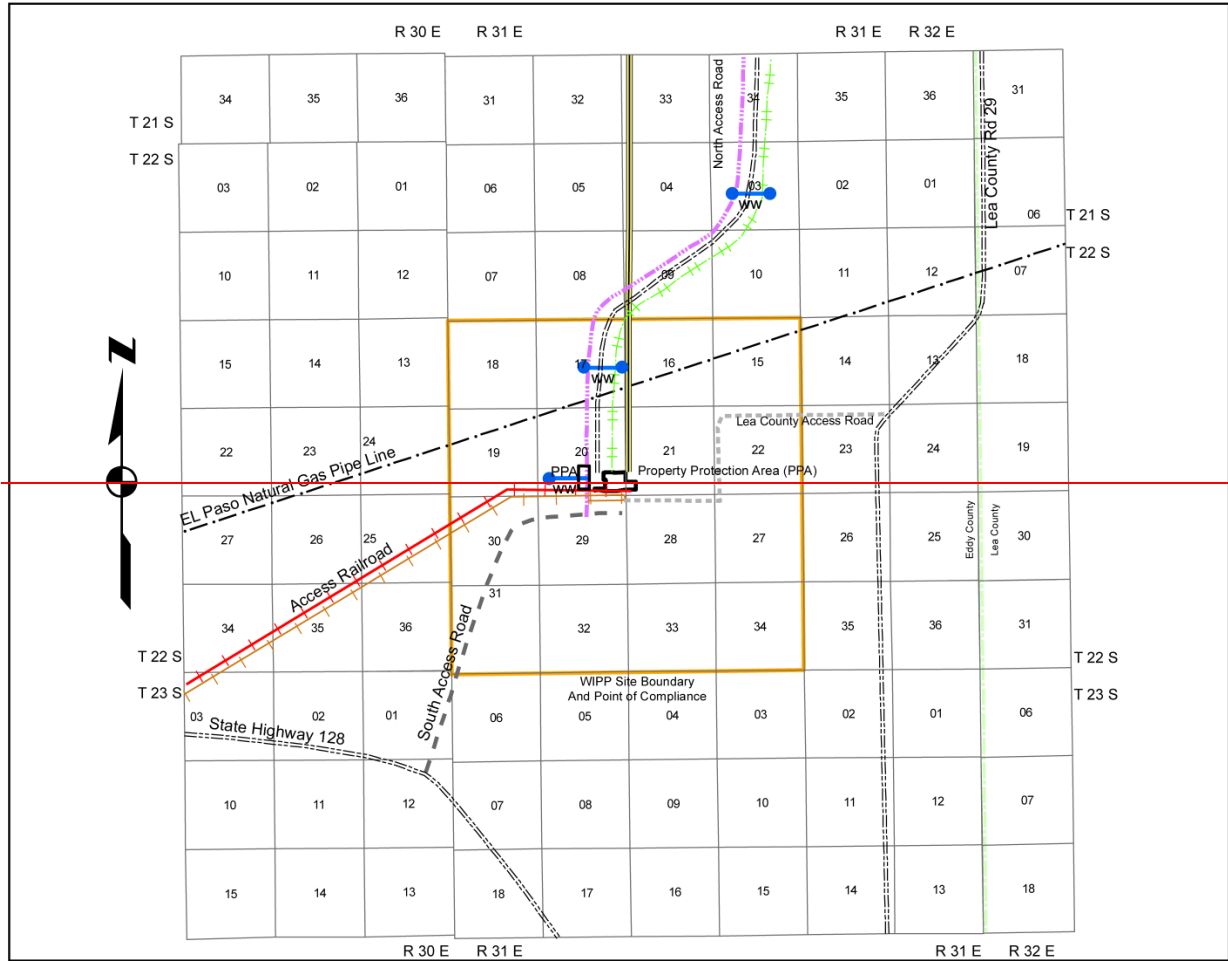


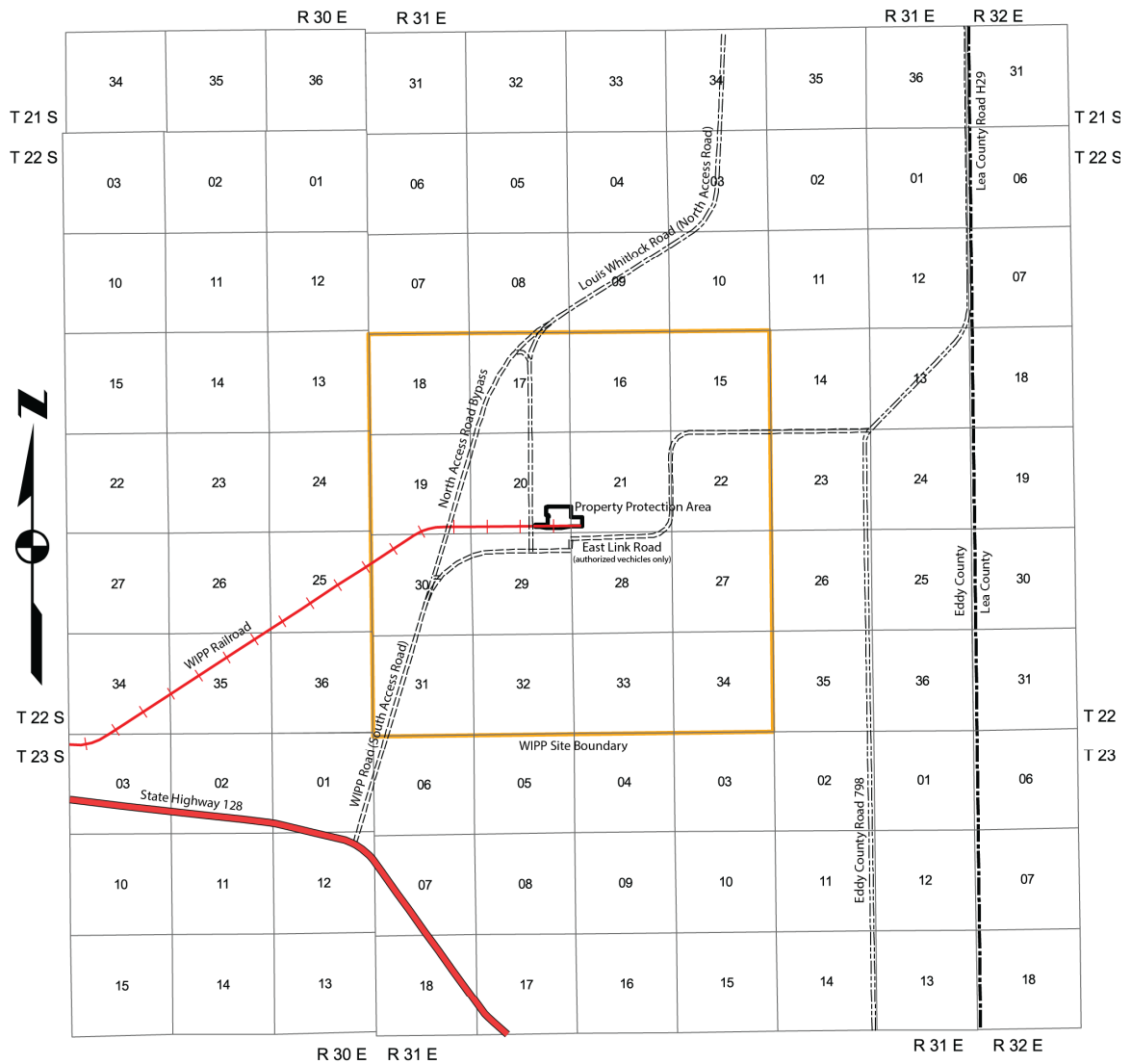


**Figure B2-1**  
**General Location of the WIPP Facility**



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## LEGEND

- WIPP Site Boundary
- +++ Railroad
- State Highway
- Other Roads

**Figure B2-32**  
 Planimetric Map-WIPP Facility Boundaries

## Legend



WIPP Site Boundary 10,240 Acres.



U.S. DOE Right of Way Number NM-53809. For Waterline, 50 Feet Wide.  
The DOE had Agreed with the City of Carlsbad to Allow the Individuals to Tap this Line Located within the North Access Road Right of Way.



Tap Lines Connected to the Main WIPP Waterline (ww).



Stock Water Tanks.



Southwestern Public Service Company Right of Way Number NM-43203 for Power 60 Feet Wide.



General Telephone of the Southwest Right of Way for Telephone Line, 30 Feet Wide, Located within the North Access Road Right of Way.



General Telephone of the Southwest Right of Way Number NM-60174 for Telephone Line, 30 Feet Wide, Located within the Railroad Right of Way.



U.S. DOE Right of Way Number NM-55675 for North Access Road, 170 Feet Wide.



~~U.S. DOE Right of Way for Access Roads Includes Right of Way Number NM-123703~~  
for the South Access Road, 140 Feet Wide.



El Paso Natural Gas Company Right of Way for Gas Pipeline, 30 Feet Wide in Section 16, 50 Feet Wide Elsewhere.



U.S. DOE Right of Way Number NM-55699 for Access Railroad, 150 Feet Wide.

## NOTES

1. The Property Protection Area is a fenced area of approximately 34 acres without the New Filter Building (NFB) and approximately 44 acres with the NFB. It contains all surface facilities with the exception of salt storage piles, parking lot, landfill and waste water stabilization lagoons.
2. An additional Property Protection Area of approximately 22 acres surrounds shaft #5.
3. WIPP Site Boundary (WSB) provides a one mile buffer area around the area available for underground development

**Figure B2-2a**  
**Legend to Figure B2-2**

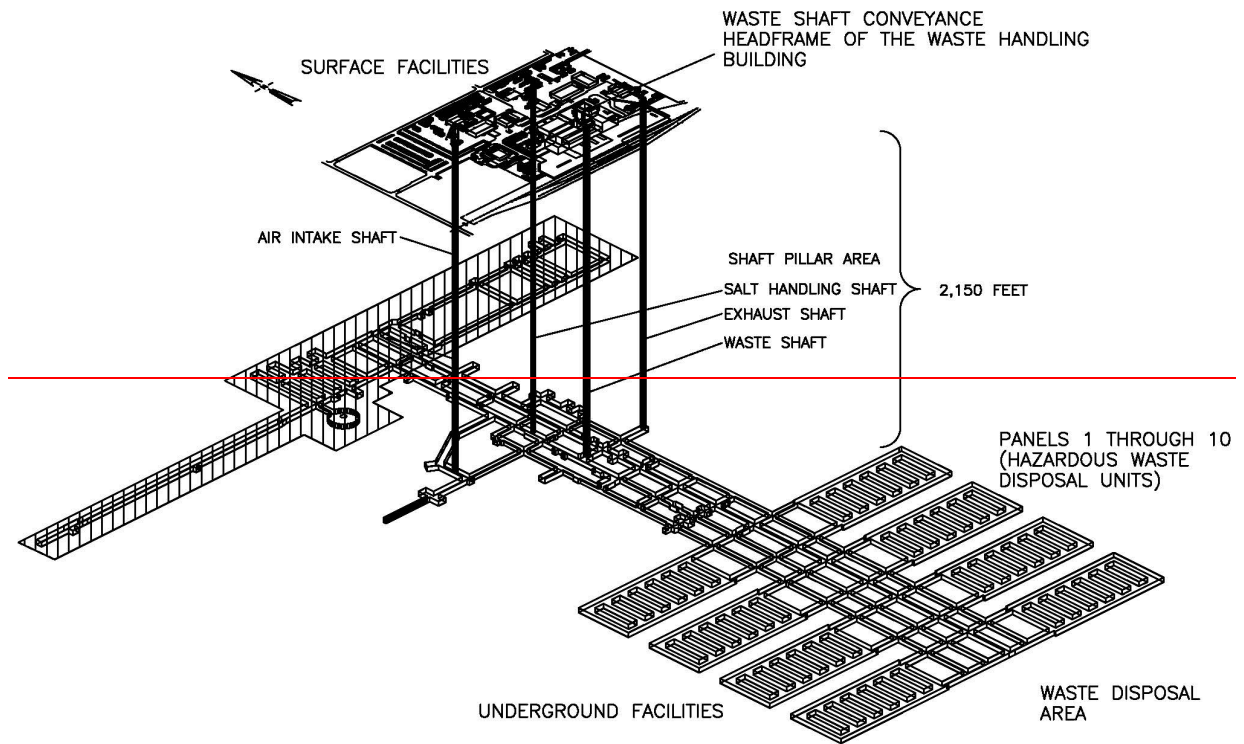


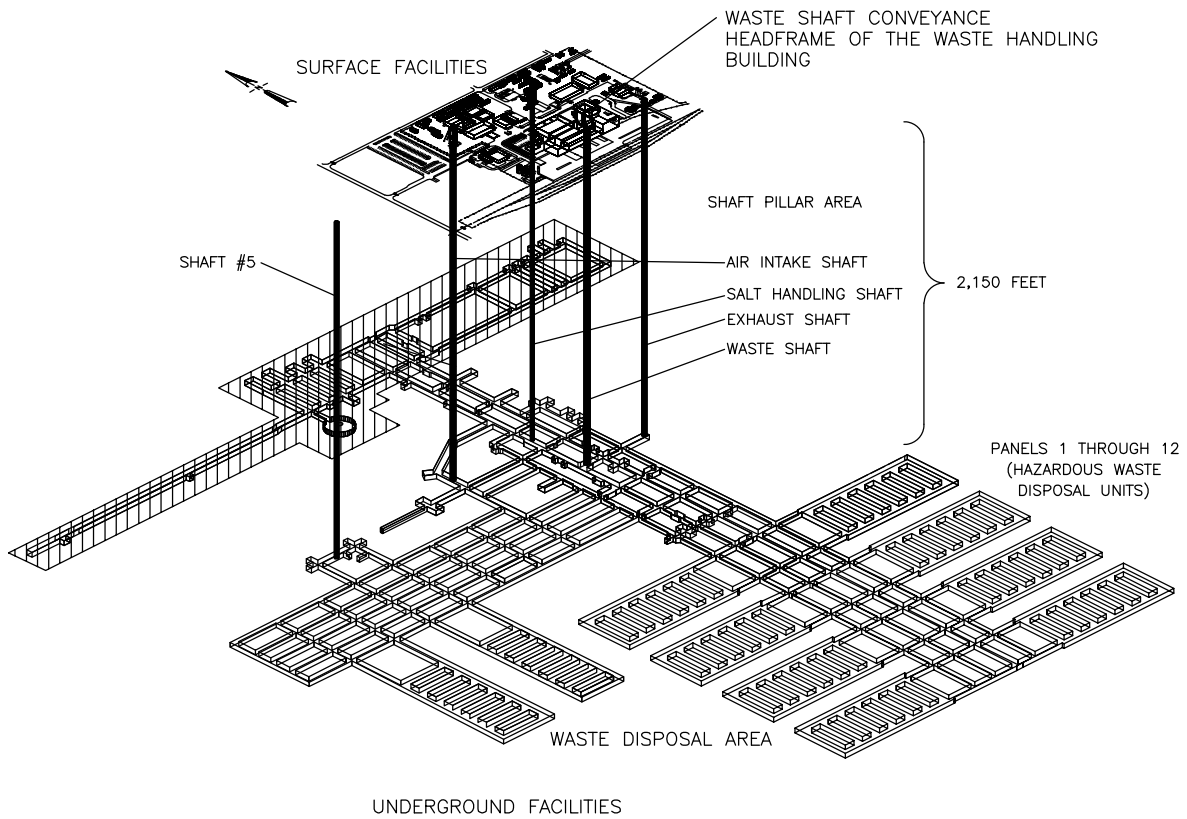
~~Replace this page with the Topographic  
Map from the earlier version of the draft Permit~~

~~Figure B2-3  
Topographic Map~~

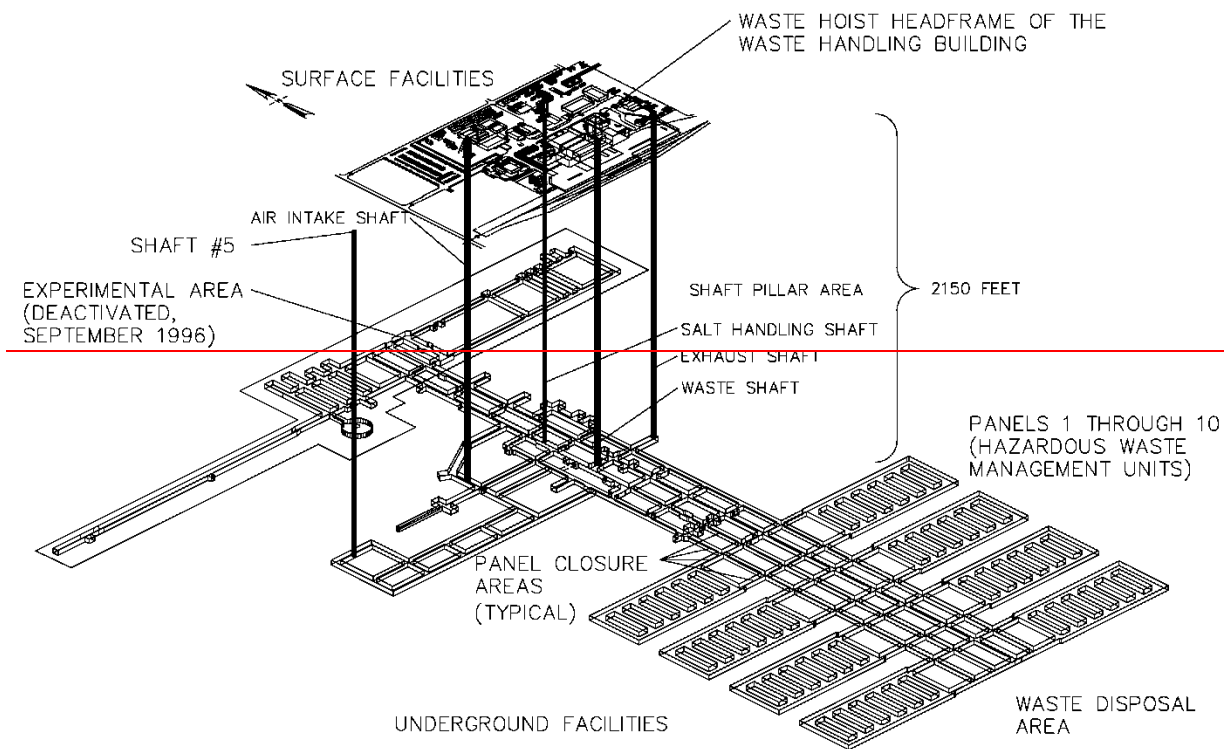
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**APPENDIX B3  
FACILITIES**

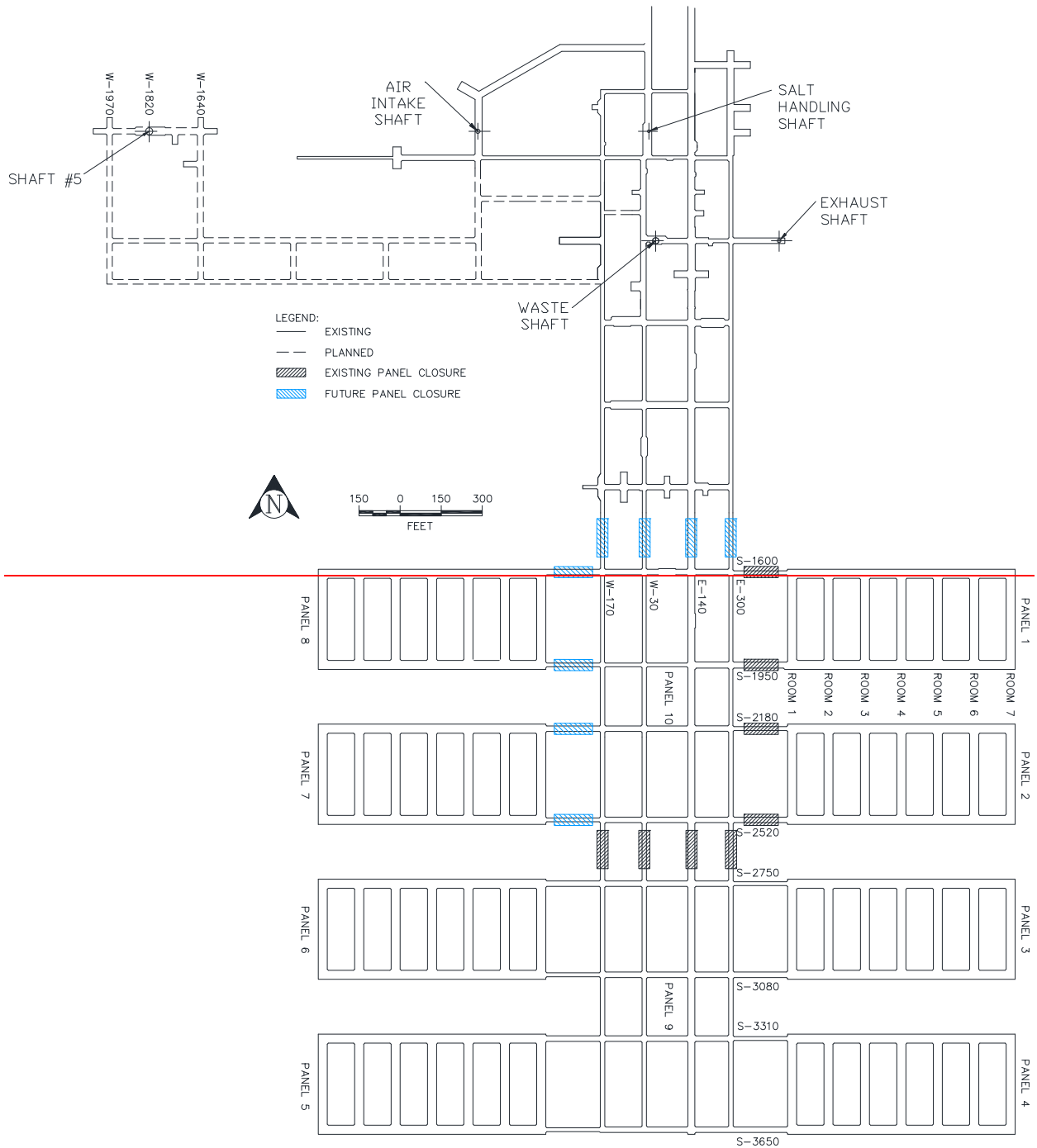




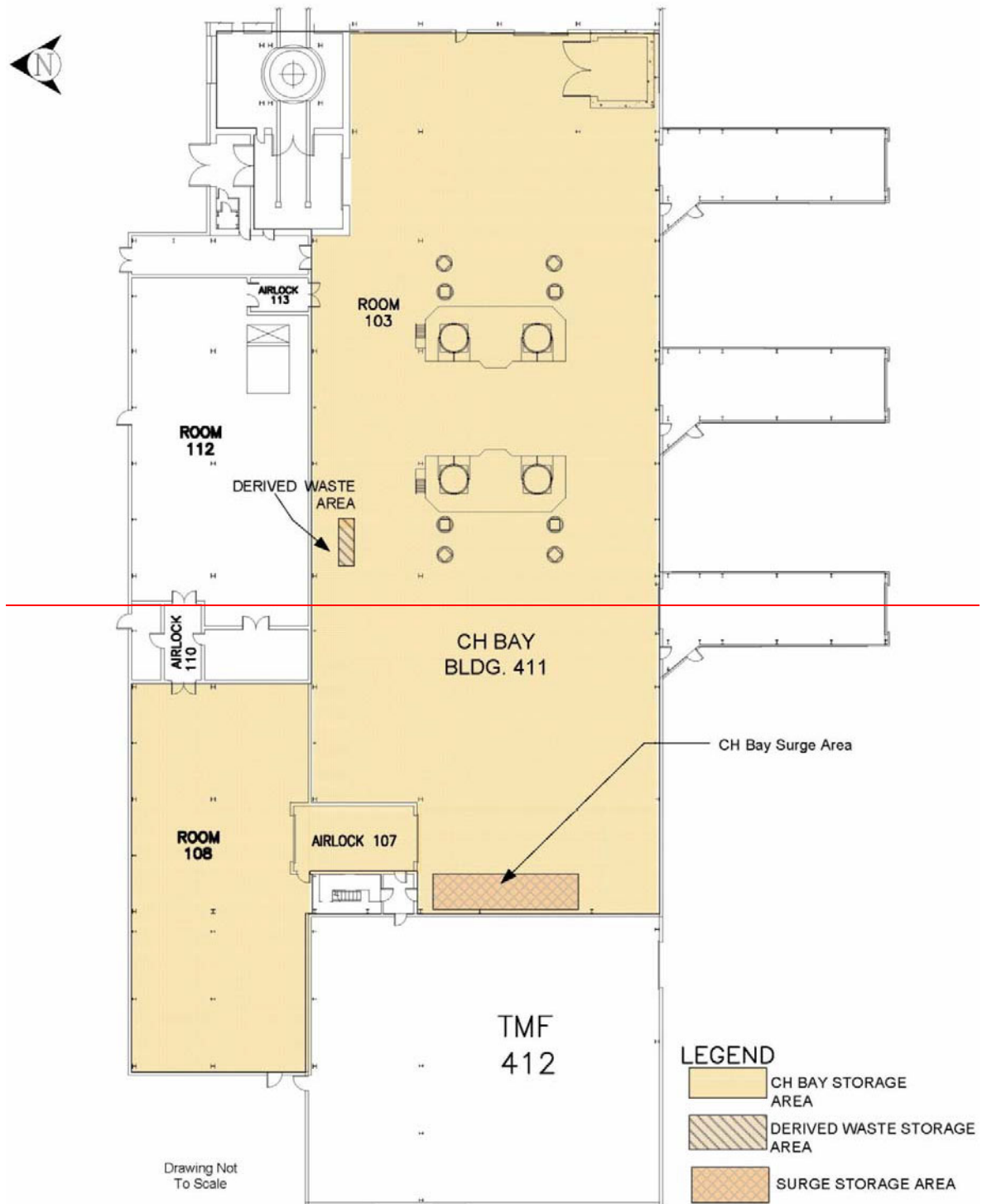
**Figure B3-1**  
**Spatial View of the WIPP Facility**



**Figure B3-1-S#5**  
**Spatial View of the WIPP Facility (with S#5)**



**Figure B3-2**  
**Repository Horizon**



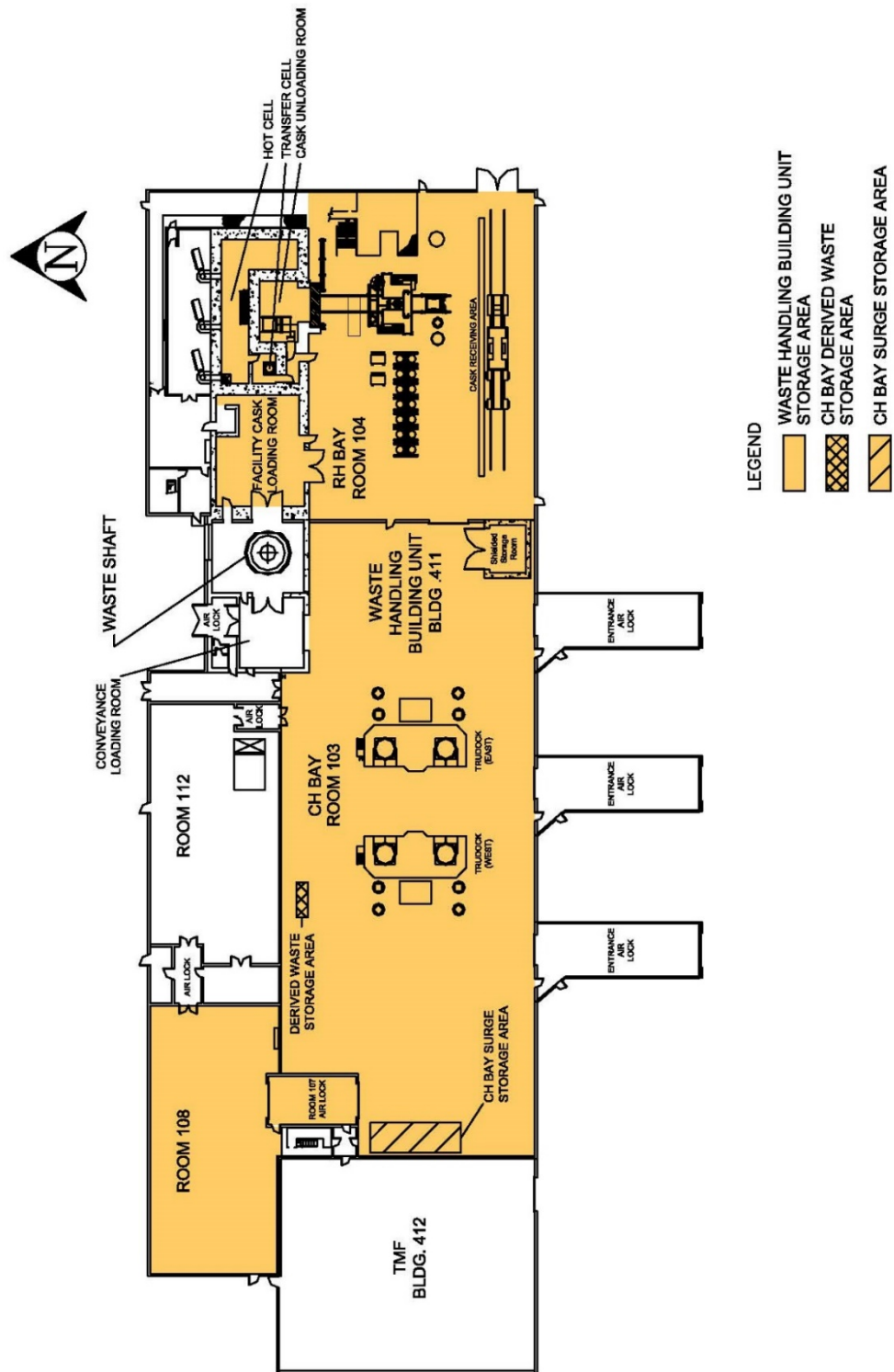
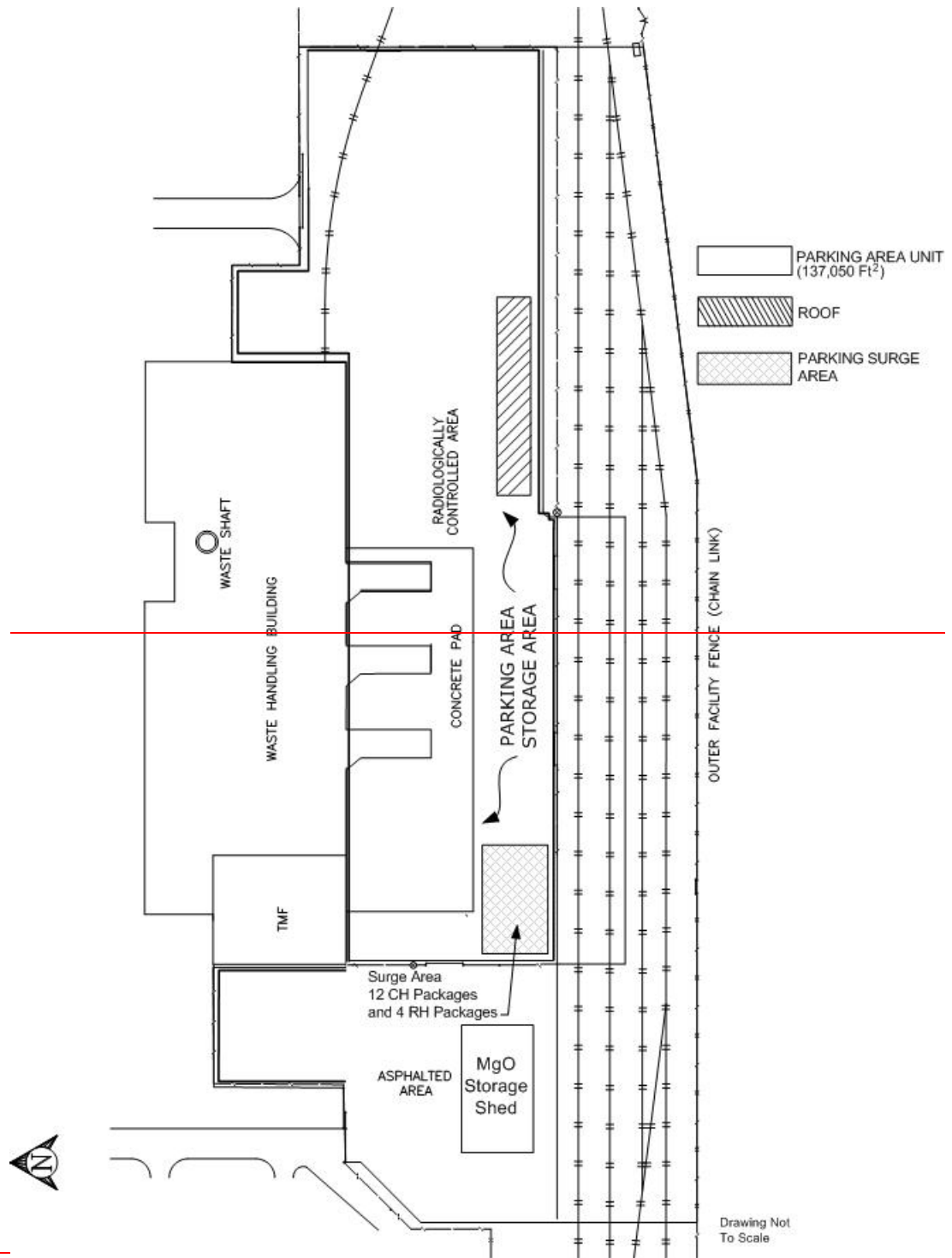
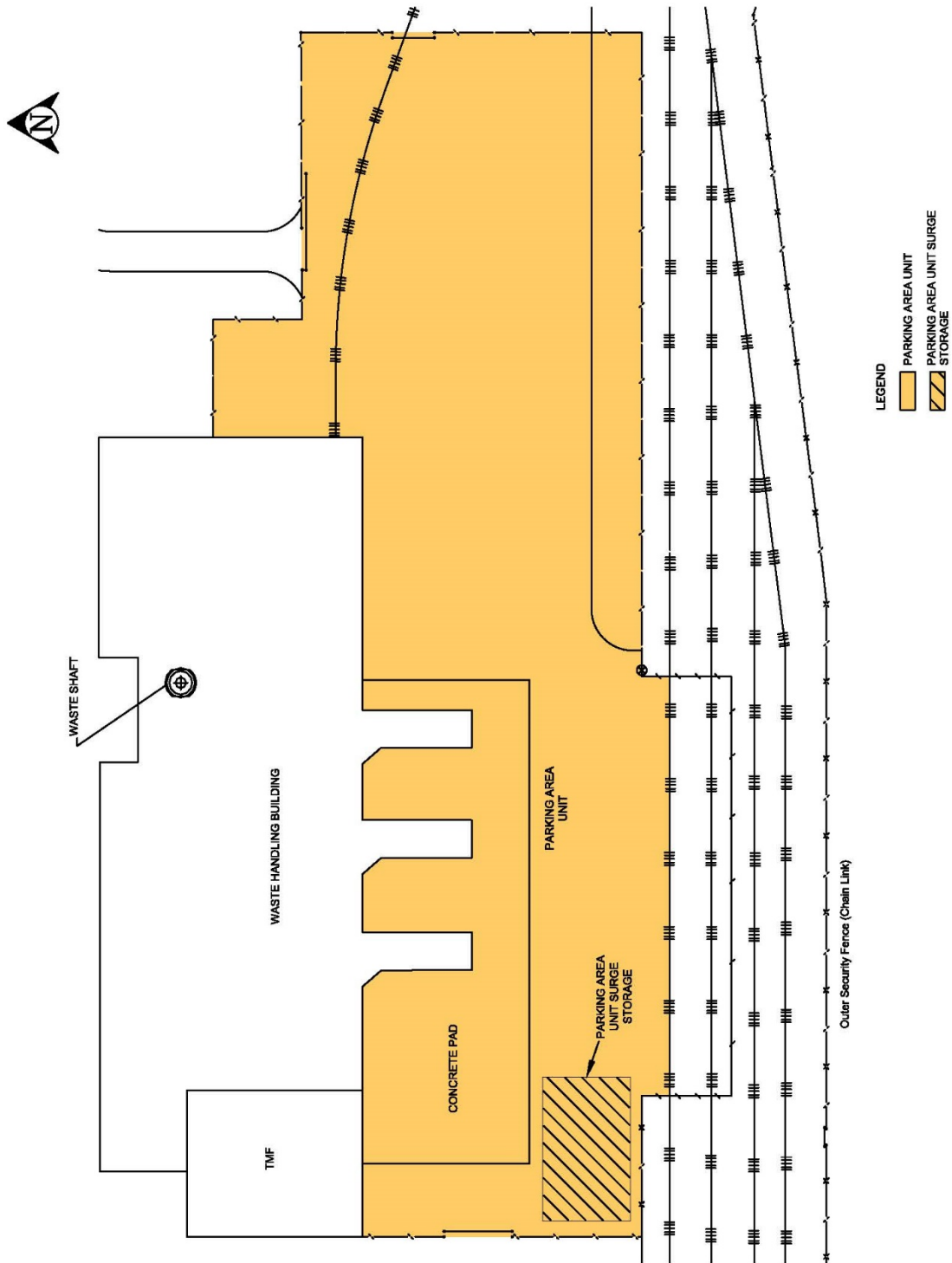


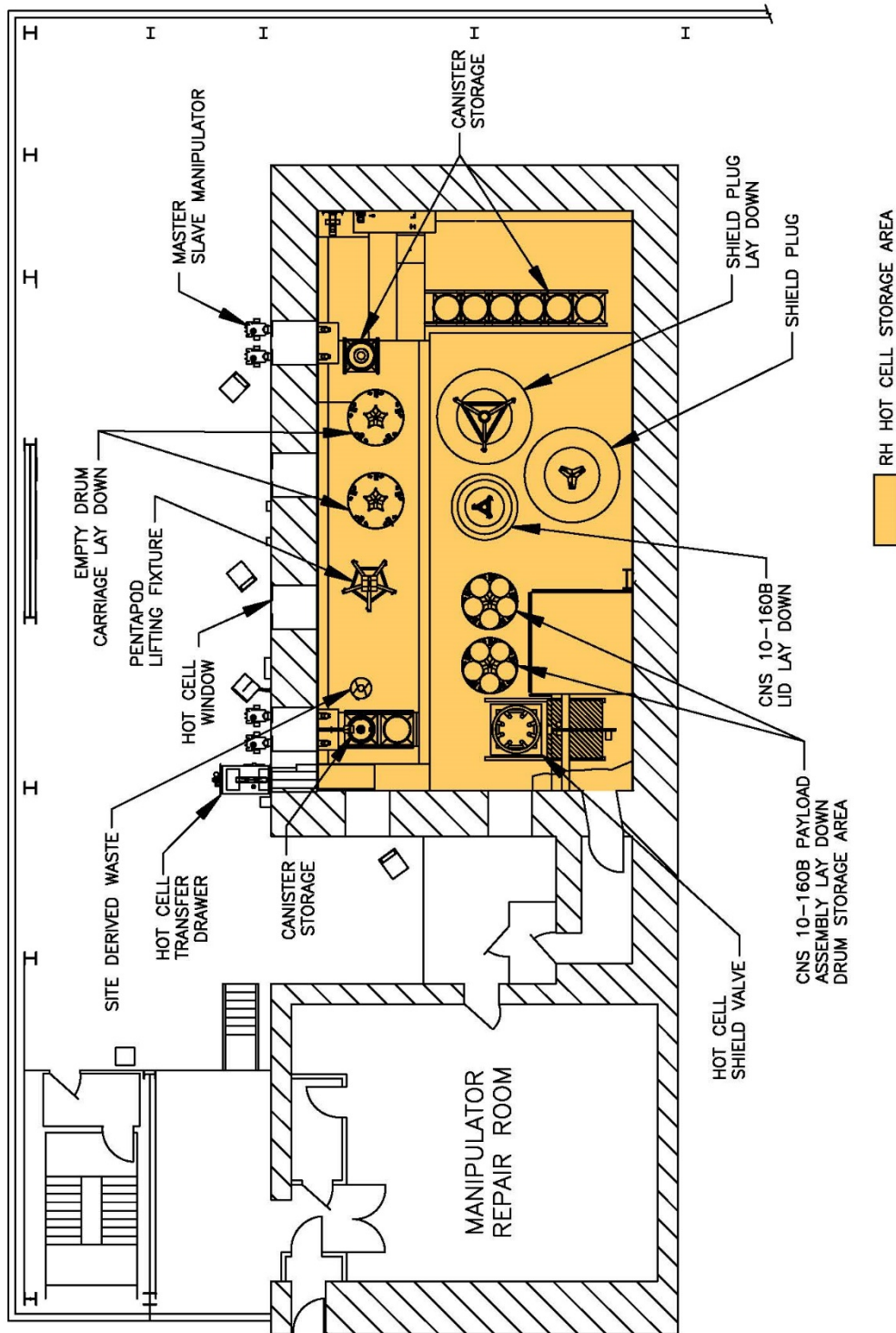
Figure B3-23  
 Waste Handling Building - CH-TRU Mixed Waste Container Storage and Surge Areas



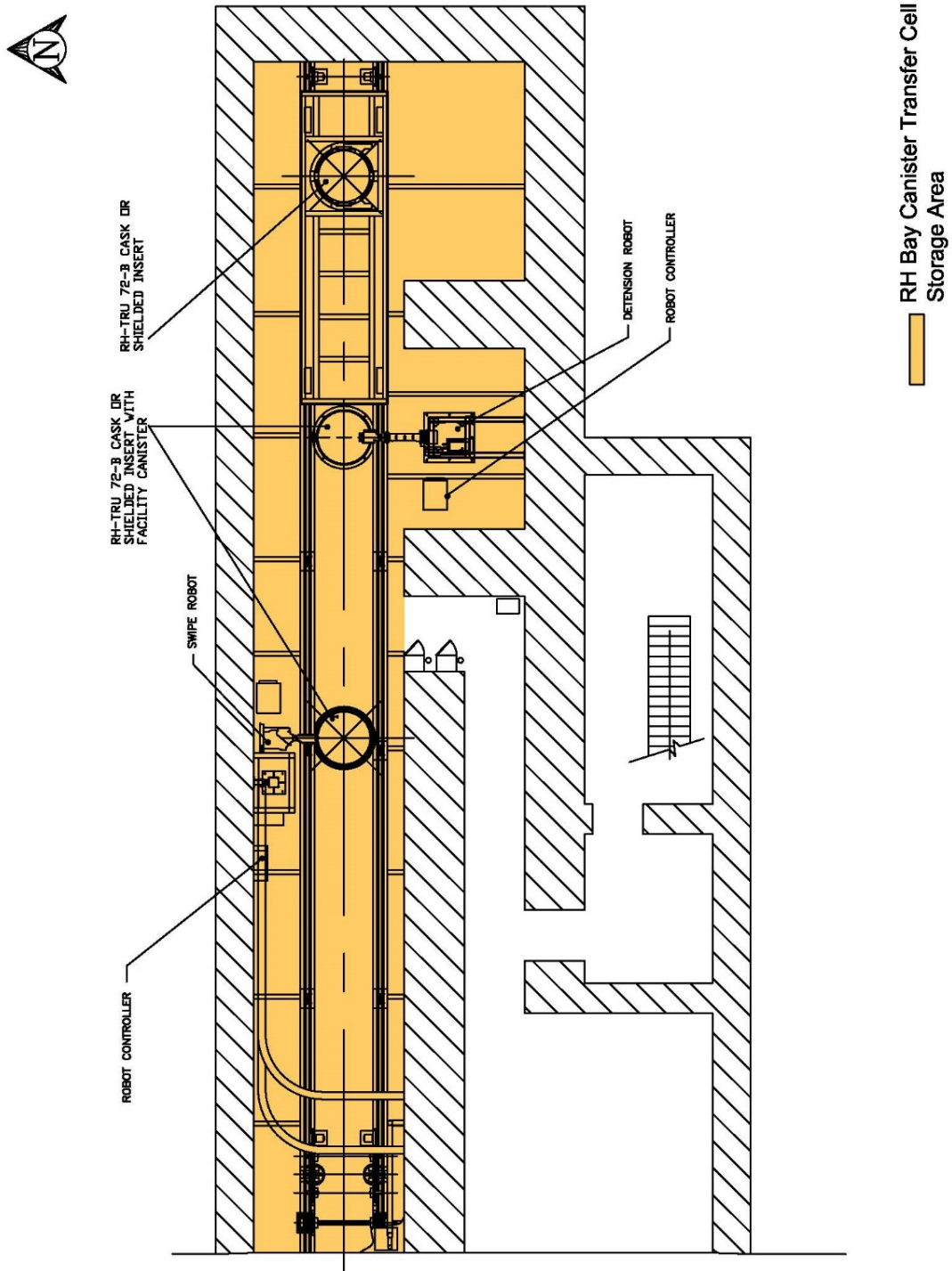




**Figure B3-34**  
Parking Area Unit - TRU Mixed Waste Container Storage and Surge Areas

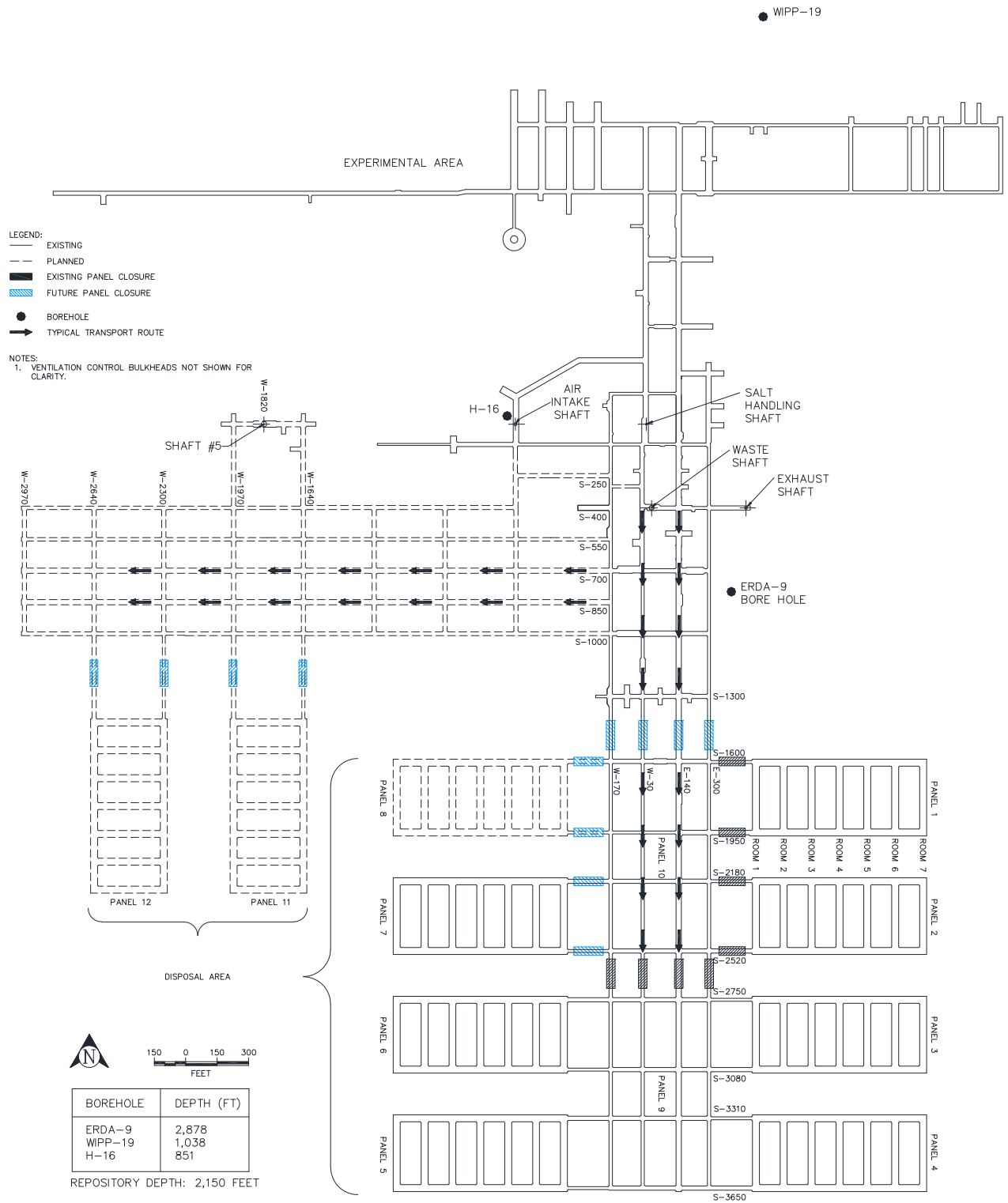


**Figure B3-4**  
**RH Hot Cell Storage Area**

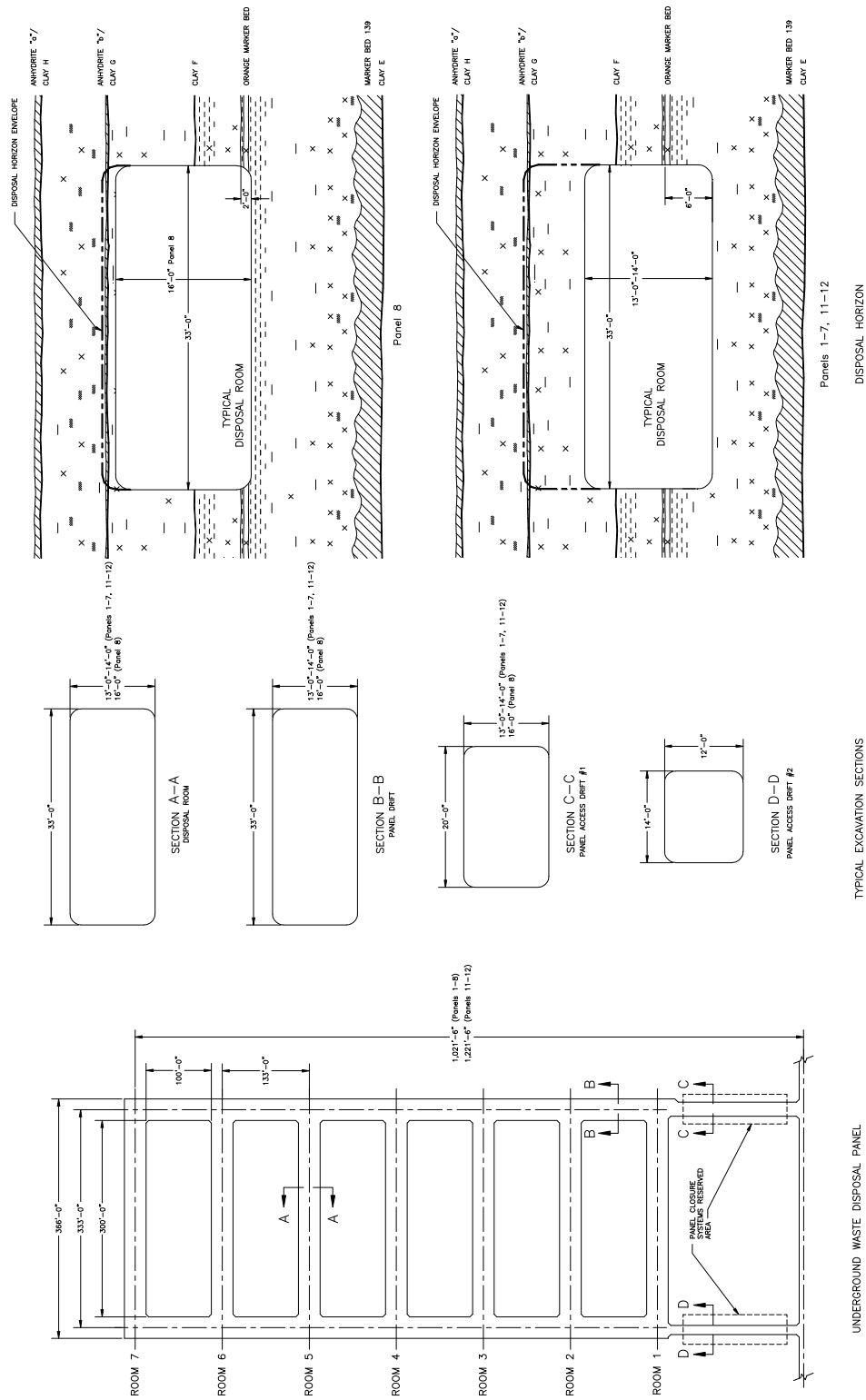


**Figure B3-5**  
**RH Canister Transfer Cell Storage Area and Waste Transport Route**

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**Figure B3-6**  
**Repository Horizon**



**Figure B3-7**  
**Typical Disposal Panel**

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**APPENDIX B4  
PHOTOGRAPHS**









**Figure B4-1**  
**Aerial Photograph of the Waste Isolation Pilot Plant**



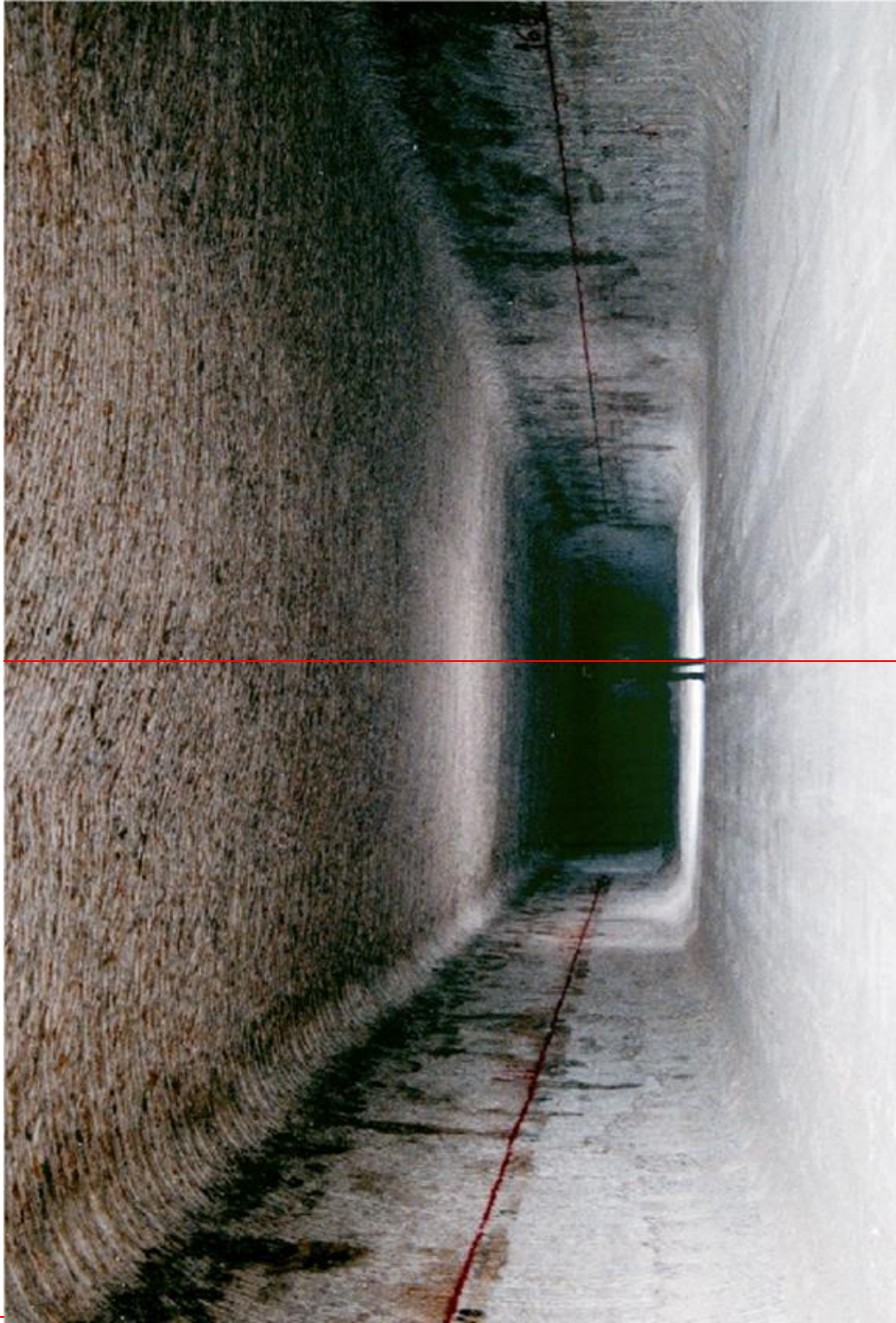
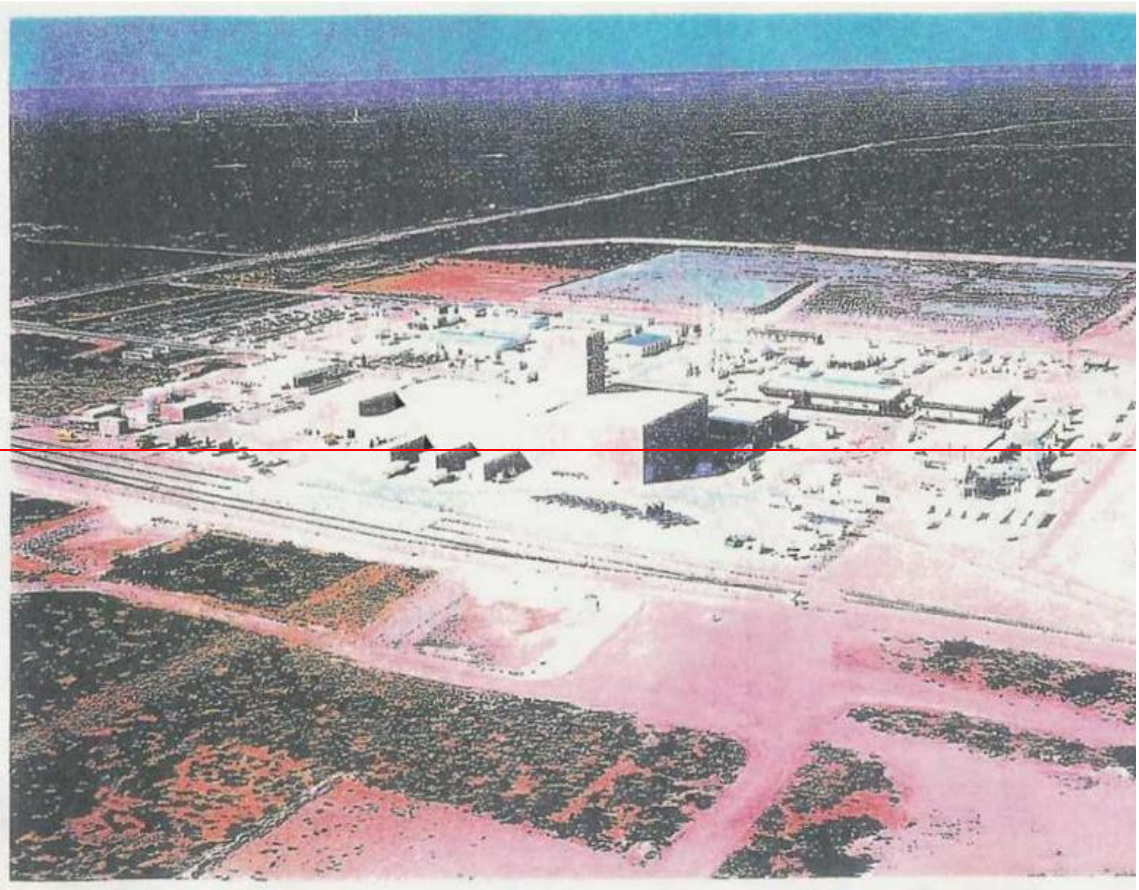






Figure B4-2  
Underground - Panel ~~7One~~ - ~~Panel Entry~~Waste Disposal Room







**Figure B4-3**  
**Aerial Photograph of the Waste Handling Building**







Figure B4-4  
TRUDOCKs (East) in CH Bay of the Waste Handling Building







**Figure B4-5**  
**NE Corner of CH Bay of the Waste Handling Building**



**Figure B4-6**  
**Westward View of CH Bay of the Waste Handling Building**







**Figure B4-67**  
Waste Shaft Conveyance - Loading Facility Pallet with CH Waste, Waste Handling Building







**Figure B4-78**  
**RH Bay (Photo Taken July 2000)**



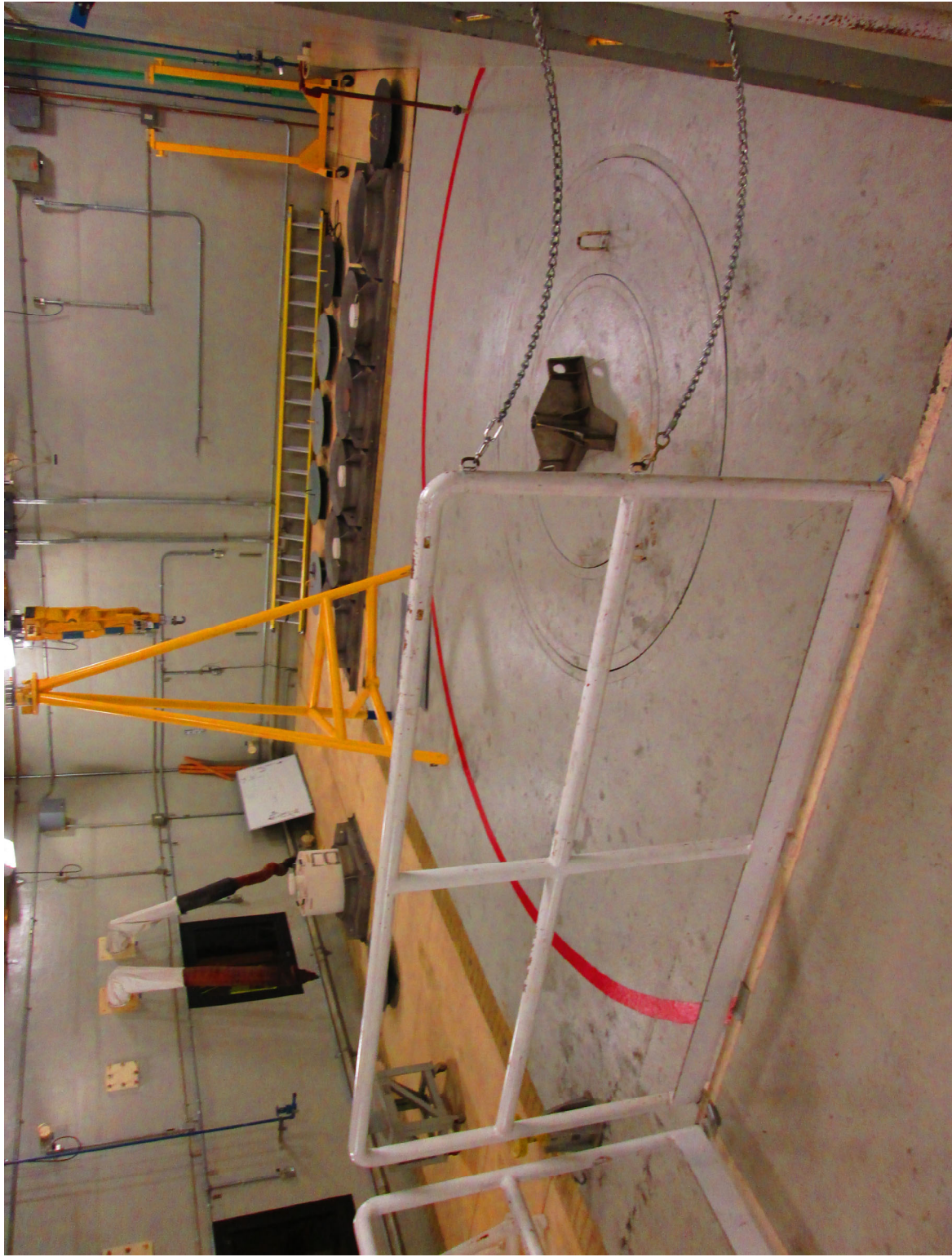




**Figure B4-89**  
Cask Unloading Room and Bridge Crane







**Figure B4-940**  
**Hot Cell**







**Figure B4-1044**  
**Transfer Cell**







**Figure B4-1142**  
**Facility Cask Loading Room and Facility Cask Rotating Device**

## ATTACHMENT A4A3

### TRAFFIC PATTERNS

#### A4A3-1 Traffic Information and Traffic Patterns

Access to the Waste Isolation Pilot Plant (WIPP) facility is provided ~~by two access roads~~via Louis Whitlock Road that connects with U.S. Highway 62/180, 13 miles (mi) (21 kilometers (km)) to the north, and NM State Highway 128 (Jal Highway), 4 mi (6.4 km) to the south (Figure M-57A4-1) via the South Access Road. These access roads were built for the Permittees to transport transuranic (TRU) mixed waste to the site WIPP facility. Both access roads are owned and maintained by the Department of Energy (DOE). Signs and pavement markings are located in accordance with the Uniform Traffic Control Devices Manual. Access-road design designation parameters, such as traffic volume, ~~are were~~ presented in Table A4-1 the 2009 Amended Renewal Application, Chapter G, Table G-1 (DOE, 2009).

#### A4A3-2 Facility Access and Traffic

Access to the WIPP 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 Parking Area Container Storage Unit (PAU) just east of the air locks (Figure M-58A4-2). Outgoing trucks depart the same way they arrived, normally out of the west end of the parking area PAU, north through the fence gate and out through the vehicle trap. An alternate inbound route is to continue straight ahead (east) from the security checkpoint to the second road and to turn south to enter the truck parking area PAU. 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 do~~ 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. Figures M-58 and M-59A4-2 show surface traffic flow at the WIPP facility.

The site WIPP facility speed limit for motor vehicles is 10 miles per hour (mph) (16 kilometers per hour (kph)) and 5 mph (8 kph) for rail movements. Speed limits are clearly posted at the entrance to the site facility and enforced by security officers. There are no traffic signals. Stop signs are located at the major intersections of roadways with the main east-west road. Safety requirements are communicated ~~to all site personnel~~ via General Employee Training which must be completed by site personnel within 30 days of their employment. Employee access to on-site facilities requires an annual refresher course to reinforce the safety requirements. Security officers monitor vehicular traffic for compliance with site restrictions, and provide instructions to off-site delivery shipments. Vehicular traffic other than the waste transporters use the same roads, but there ~~will be~~ is no interference because there are two lanes available on the primary and alternate routes for waste shipments. Pedestrian traffic is limited to the sidewalks and prominently marked crosswalks. Site traffic Traffic within the security fence is composed mostly of pickup trucks and electric carts with ~~a an approximate~~ frequency of ~~perhaps~~ 10 per hour at peak periods. Emergency vehicles are exercised periodically for maintenance and personnel training, with an average frequency of one each per day. They are used for their intended purpose on an as-required basis.



1 The traffic circulation system is designed in accordance with American Association of State  
2 Highway and Transportation Officials (**AASHTO**) Site Planning Guides for lane widths, lateral  
3 clearance to fixed objects, minimum pavement edge radii, and other geometric features. Objects  
4 in or near the roadway are prominently marked.

5 On-site roads, sidewalks, and paved areas are used for the distribution and storage of vehicles  
6 and personnel and are designed to handle ~~all~~ traffic generated by employees, visitors, TRU  
7 mixed waste shipments, and movements of operational and maintenance vehicles. The facility  
8 entrance and TRU mixed waste haul roads are designed for AASHTO H20-S16 wheel loading.  
9 Service roads are designed for AASHTO H10 wheel loading. Access and on-site paved roads  
10 are designed to bear the anticipated maximum load of 115,000 lbs./lb (52,163.1 kg), the  
11 maximum allowable weight of a truck/trailer carrying loaded ~~Contact~~Handled  
12 ~~(CH)~~ or ~~Remote~~Handled ~~(RH)~~ Packagepackages. The facility is designed to  
13 handle approximately eight truck trailers per day, each carrying one or more ~~Contact~~  
14 ~~Handled~~CH or ~~Remote~~HandledRH Packagepackages. This is equivalent to 3,640 TRU mixed  
15 waste-carrying vehicles per year.

16 The calculations to support the anticipated maximum load of 115,000 ~~lbs./lb~~ are shown  
17 ~~below; were provided in the 2009 Amended Renewal Application, Chapter G (DOE, 2009).~~

18 ~~Soil Resistance R (psi) – is taken directly from the WIPP Soil Report and Bechtel calculation~~  
19 ~~because there is no change.~~

#### 20 A. Pavement Thickness

21 ~~The traffic frequency increase from 10 shipments per day to 10.15 shipments per day has only~~  
22 ~~minimal impact on the Total Expanded Average Load (EAL) and the traffic index (TI) as shown~~  
23 ~~below, both important parameters in pavement design.~~

24 ~~Total EAL (TEAL):~~

25 ~~13,780 ~ constant for 5 or more axles over 20 years, taken from Table 7-651.2A – Highway~~  
26 ~~Design Manual (HDM).~~

27  ~~$TEAL = 13,780 \times 25\text{yr.}/20\text{yr.} = 17,225$~~

28 ~~Using 10.15 shipments per day ~  $17,225 \times 10.15 = 174,834$~~

29 ~~Conversion of EAL to Traffic Index (TI).~~

30 ~~For TEAL of 174,834 ~  $TI = 7.5$  (from HDM, Table 7-651.2B)~~

31 ~~Asphalt Concrete Thickness TAC:~~

32  ~~$GE = 0.0032 \times TI \times (100 - R) \dots R = 80$~~

33 ~~GE – Gravel Equivalent (Ft).~~

34  ~~$GE = 0.0032 \times 7.5 \times 20 = 0.48'$  ...  $GfAC = 2.01 \Rightarrow TAC = 0.48/2.01 = 0.24' \Rightarrow$  use 2½" AC~~  
35 ~~Surface Course.~~

1 ~~(Actually used: 3")~~

2 ~~Gf Gravel Equivalent Factor (constant from Table 7-651.2C from HDM).~~

3 ~~B. Bituminous Treated Base~~

4  ~~$GE = 0.0032 \times TI \times (100 - R)$  .....  $R = 55 \sim$  caliche subbase  $\Rightarrow GE = 1.08'$  ~~GEBTB = 1.08~~  ~~$2.01 \times$~~   
5  ~~$0.21 = 0.66'$~~~~

6 ~~TBTB = GEBTB/GfBTB = 0.66/1.2 = 0.55'  $\Rightarrow$  Use 4" BTB~~

7 ~~GfBTB  $\sim$  taken from table 7-651.2C~~

8 ~~C. Caliche Subbase  $\sim$  TCSB~~

9  ~~$GE = 0.0032 \times TI \times (100 - R)$  .....  $R = 50$  prepared subgrade~~

10  ~~$GE = 1.2$~~

11  ~~$GECSB = 1.2 - (0.21 \times 2.07) - (0.33 \times 1.2) \Rightarrow 0.37'$~~

12  ~~$TCBS = 0.37/1.0 = 0.37' \sim 4\frac{1}{2}"$~~

13 ~~Based on the results of the above calculation, the site paved roads designated for waste~~  
14 ~~transportation are safe to be used by the heavier truckloads carrying shipping casks used in RH~~  
15 ~~TRU mixed waste transportation to the WIPP.~~

16 ~~A4A3-3~~ Waste Handling Building Traffic

17 ~~CH Contact-handled~~ TRU mixed waste ~~will arrive~~s by tractor-trailer at the WIPP facility in sealed  
18 ~~Contact Handled~~CH Packages~~packages~~. Prior to unloading the packages from the trailer,  
19 security checks, radiological surveys, and shipping documentation reviews ~~will be~~are performed.  
20 A forklift or Yard Transfer Vehicle ~~will remove~~s the ~~Contact Handled~~CH Packages~~packages~~ and  
21 transports them a short distance through an air lock that is designed to maintain differential  
22 pressure in the Waste Handling Building (WHB). The forklift or Yard Transfer Vehicle ~~will~~  
23 ~~place~~places the shipping containers at one of the two TRUPACT-II unloading docks  
24 (TRUDOCKs) inside the WHB or, in the case of the TRUPACT-III, at the ~~payload transfer~~bolting  
25 station in Room 108 in the WHB.

26 The TRUPACT-II may hold up to two 55-gallon (gal) drum seven-packs, two 85-~~gallon-gal~~ drum  
27 four-packs, two 100-~~gallon-gal~~ drum three-packs, two standard waste boxes (SWBs), or one  
28 ten-drum overpack (TDOP). A HalfPACT may hold seven 55-~~gallon-gal~~ drums, one SWB, ~~or~~  
29 four 85-~~gallon-gal~~ drums, or three shielded containers. The TRUPACT-III holds a single  
30 standard large box 2 (SLB2). A six-ton overhead bridge crane or Facility Transfer Vehicle with a  
31 transfer table ~~will be~~is used to remove the contents of the ~~Contact Handled~~CH  
32 Package~~package~~. Waste containers ~~will be~~are surveyed for radioactive contamination and  
33 decontaminated or returned to the ~~Contact Handled~~CH Package~~package~~, as necessary.

34 Each facility pallet ~~will accommodate~~s four 55-~~gallon-gal~~ drum seven-packs, four SWBs, four 85-  
35 ~~gallon-gal~~ drum four-packs, four 100-~~gallon-gal~~ drum three-packs, two TDOPs, ~~or~~ an SLB2, or

1 ~~two three-packs of shielded container assemblies~~. Waste containers ~~will beare~~ secured to the  
2 facility pallet prior to transfer. A forklift or facility transfer vehicle ~~will transports~~ the loaded facility  
3 pallet into the air lock at the Waste Shaft (Figures ~~M-60A4-3, A4-3a, and A4-3b~~). The facility  
4 transfer vehicle ~~will beis~~ driven onto the waste shaft conveyance deck, where the loaded facility  
5 pallet ~~will beis~~ transferred to the waste shaft conveyance and downloaded for emplacement.

6 ~~Remote-handledRH~~ TRU mixed waste ~~will arrives~~ at the WIPP facility in a payload container  
7 contained in a shielded cask loaded on a tractor-trailer. Prior to unloading the cask from the  
8 trailer, radiological surveys, security checks, and shipping documentation reviews ~~will beare~~  
9 performed, and the trailer carrying the cask ~~will beis~~ moved into the Parking Area PAU or  
10 directly into the RH Bay of the Waste Handling Building Container Storage Unit.

11 The cask is unloaded from the trailer in the RH Bay and is placed on the Cask Transfer Car.  
12 The Cask Transfer Car is used to move the cask to the Cask Unloading Room. At this point, a  
13 crane moves the waste to the Hot Cell or the Transfer Cell. Some RH TRU mixed waste may be  
14 moved to the Hot Cell for overpacking before being moved to the Transfer Cell. Once in the  
15 Transfer Cell, the Transfer Cell Shuttle Car moves the waste to a location beneath the facility  
16 cask. A crane is used to move the waste from the Transfer Cell Shuttle Car into the facility cask.  
17 The Facility Cask Transfer Car then moves the facility cask to the underground. A more detailed  
18 description of waste handling in the WHB is included in Attachment A1. Figures ~~A4-5, A4-6 and~~  
19 ~~A4-7M-13, M-15, and M-16~~ show RH TRU mixed waste transport routes.

#### 20 ~~A4A3-4~~ Underground Traffic

21 The Permittees ~~shall~~ designate the traffic routes of TRU mixed waste handling equipment and  
22 construction equipment and record this designation on a map that is posted in a location where  
23 it can be examined by personnel entering the underground. The map will be updated whenever  
24 the routes are changed. Maps will be available in facility files until facility closure. The ventilation  
25 and traffic flow path in the TRU mixed waste handling areas underground are restricted and  
26 separate from those used for mining and haulage (construction) equipment, except that during  
27 waste transport in W-30, ventilation need not be separated north of S-1600 (~~Figures A4-4 and~~  
28 ~~A4-4a~~Figure M-43). In general, the Permittees restrict waste traffic to the intake ventilation drift  
29 to maximize isolation of this activity from personnel. ~~The exhaust drift in the waste disposal area~~  
30 ~~will normally not be used for personnel access.~~ Non-waste and non-construction traffic is  
31 generally comprised of escorted visitors only and is minimized during each of the respective  
32 operations.

33 Adequate clearances that exceed the mining regulations of Title 30 of the Code of Federal  
34 Regulations (CFR) §Part 57 exist underground for safe passage of vehicles and pedestrians.  
35 Pedestrians/personnel are required to yield to vehicles in the WIPP underground facility. This  
36 condition is reinforced through the WIPP facility equipment operating procedures, the WIPP  
37 Safety Manual, the WIPP facility safety briefing required for ~~all~~ underground visitors, the General  
38 Employee Training annual refresher course, and the ~~Underground underground~~ annual  
39 refresher course that are mandated by 30 CFR §Part 57, the New Mexico Mine Code, and DOE  
40 Order 5480.20A.

41 In addition, other physical means are utilized to safeguard pedestrians/personnel when  
42 underground such as:

1           • ~~All~~eEquipment operators are required to sound the vehicle horn when approaching  
2           intersections.

3           • ~~All~~aAirlock and bulkhead vehicle doors are equipped with warning bells or strobe  
4           lights to alert personnel when door movement (opening or closing) is imminent.

5           • Hemispherical mirrors are used at blind intersections so that persons can see  
6           around corners.

7           • ~~All~~hHeavy equipment is required to have operational back-up alarms.

8           • Heavily used intersections are well lighted.

9           Typically, the traffic routes during waste disposal in ~~all Panels will~~Panels 1-8 use the same  
10          main access drifts, while traffic routes during waste disposal in Panels 11 and 12 will use the  
11          designated access drifts in the West Mains.

12          ~~All~~tTraffic safety is regulated and enforced by the ~~Federal~~federal and ~~State~~state mine codes of  
13          regulations (30 CFR ~~§~~Part 57 and New Mexico State Mine Code). The agencies that administer  
14          these codes make regular inspection tours of the WIPP underground facilities for the purpose of  
15          enforcement.

16          ~~All~~uUnderground equipment is designed for off-road use since ~~all~~ driving surfaces are  
17          excavated in salt. ~~No loads on the underground roadways will exceed the bearing strength of in~~  
18          situ halite.

#### 19          References

20          DOE, 2009. WIPP Hazardous Waste Facility Permit Amended Renewal Application, Carlsbad,  
21          New Mexico, September 2009.

22

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## **TABLES**

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**Table A4-1**  
**~~Waste Isolation Pilot Plant Site Design Designation Traffic Parameters<sup>a</sup>~~**

<del>Traffic Parameter</del>	<del>North Access Road (No. of Vehicles, unless otherwise stated)</del>	<del>South Access Road (No. of Vehicles, unless otherwise stated)</del>	<del>On-Site Waste Haul Roads Contact-Handled and Remote-Handled Package Traffic)</del>
<del>Average Daily Traffic (ADT)<sup>b</sup></del>	<del>800</del>	<del>800</del>	<del>8</del>
<del>Design Hourly Volume (DHV)<sup>c</sup></del>	<del>144</del>	<del>144</del>	<del>NA<sup>g</sup></del>
<del>Hourly Volume (Max. at Shift Change)</del>	<del>250</del>	<del>250</del>	<del>NA</del>
<del>Distribution (D)<sup>d</sup></del>	<del>67%</del>	<del>67%</del>	<del>NA</del>
<del>Trucks (T)<sup>e</sup></del>	<del>2%</del>	<del>2%</del>	<del>100%</del>
<del>Design Speed<sup>h,i</sup></del>	<del>70 mph (113 kph)</del>	<del>60 mph (97 kph)</del>	<del>25 mph (40 kph)</del>
<del>Control of Access<sup>f</sup></del>	<del>None</del>	<del>None</del>	<del>Full</del>

~~<sup>a</sup> For WIPP personnel and TRU mixed waste shipments only.~~

~~<sup>b</sup> ADT— Estimated number of vehicles traveling in both directions per day.~~

~~<sup>c</sup> DHV— A two-way traffic count with directional distribution.~~

~~<sup>d</sup> D— The percentage of DHV in the predominant direction of travel.~~

~~<sup>e</sup> T— The percentage of ADT comprised of trucks (excluding light delivery trucks).~~

~~<sup>f</sup> Control of Access— The extent of roadside interference or restriction of movement.~~

~~<sup>g</sup> NA— Not applicable.~~

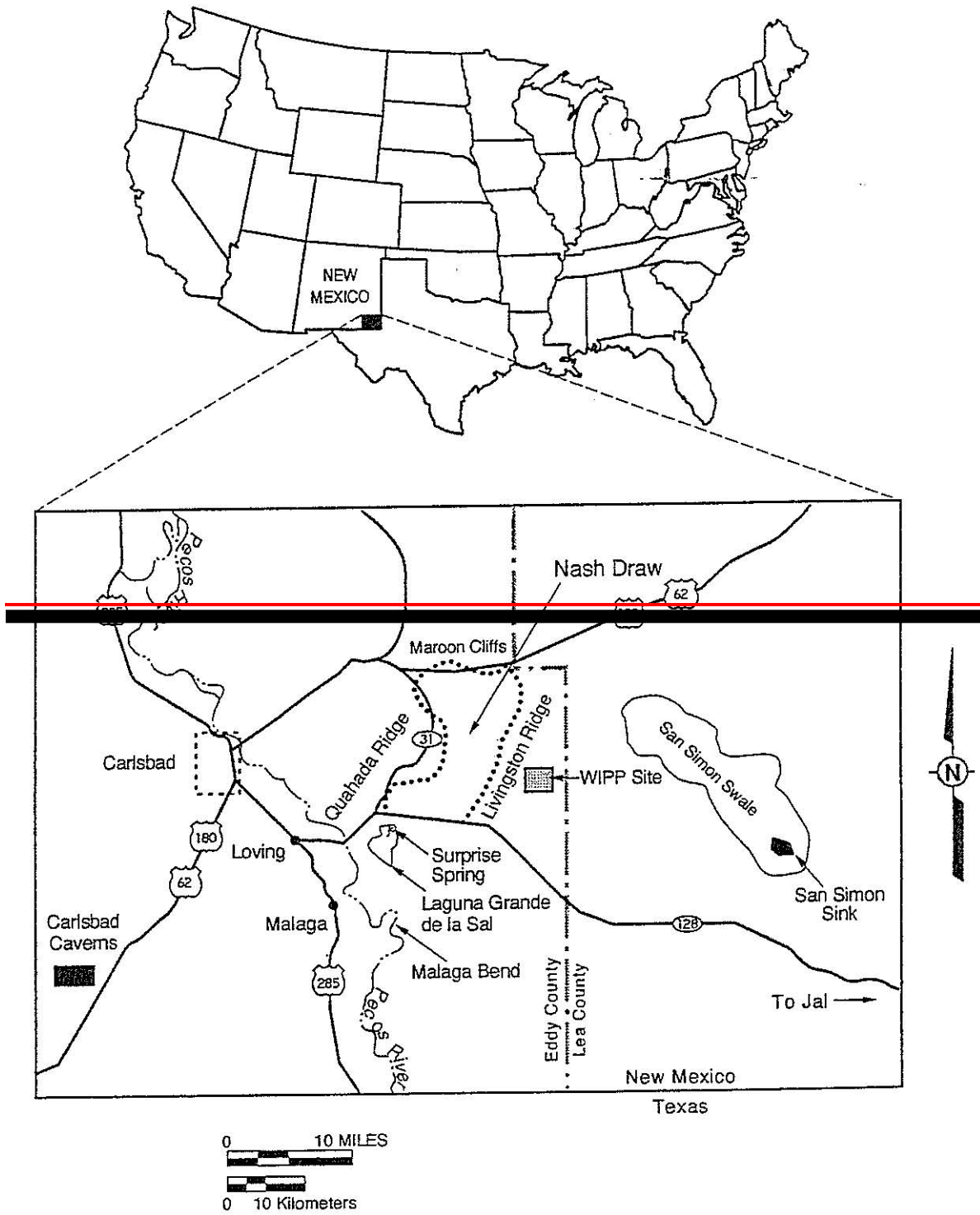
~~<sup>h</sup> mph— miles per hour.~~

~~<sup>i</sup> kph— kilometers per hour.~~

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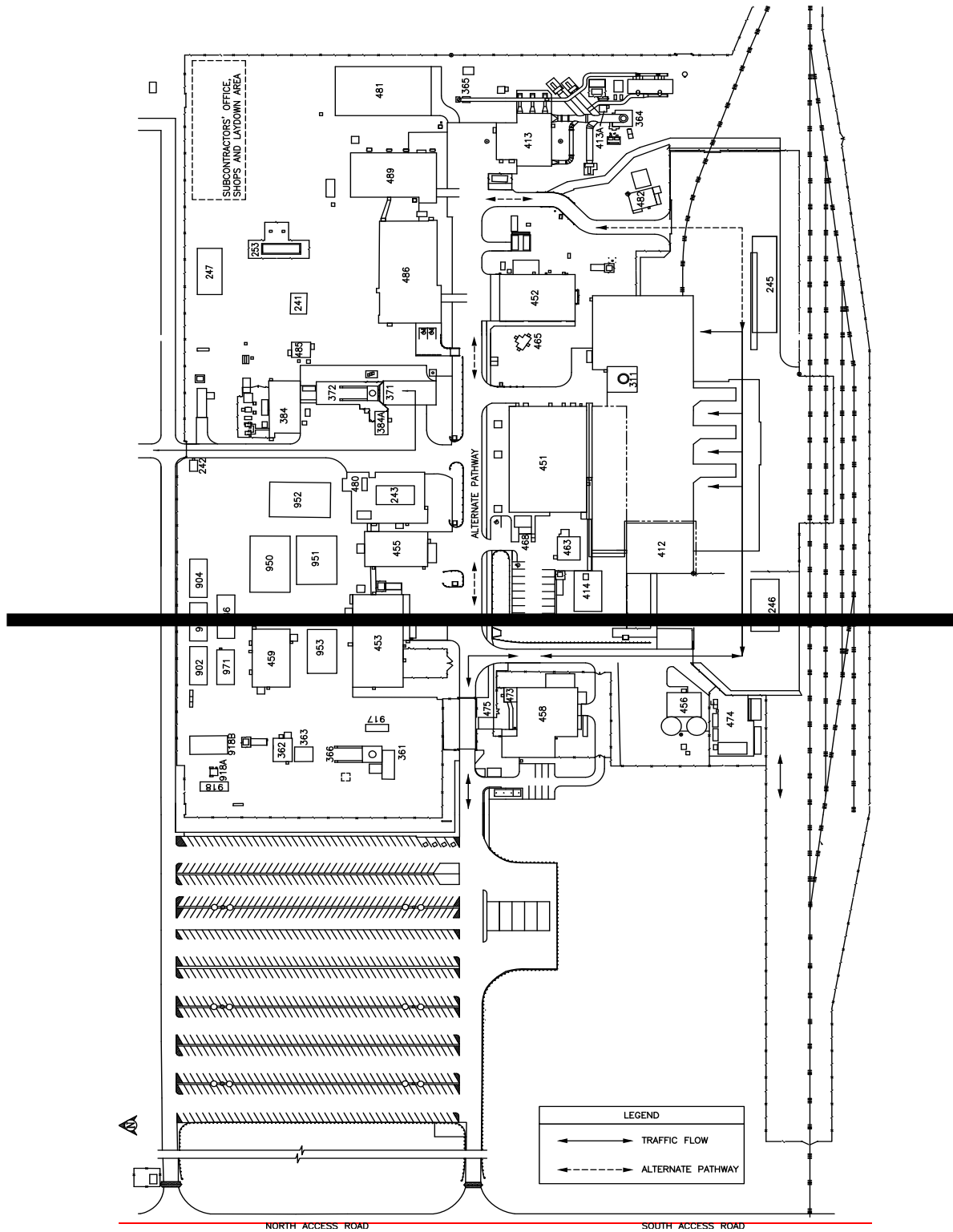
## **FIGURES**



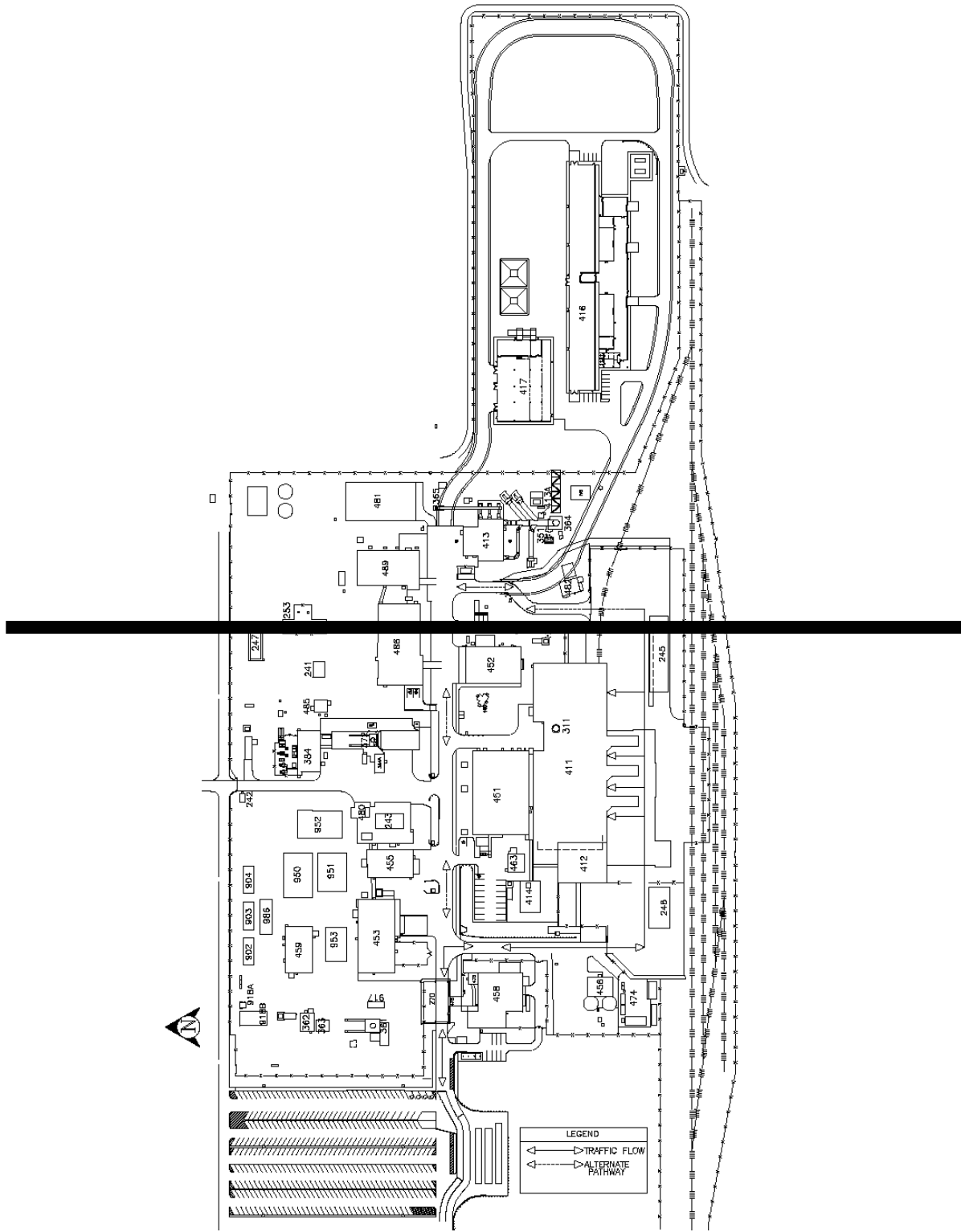


**Figure A4-4**  
**General Location of the WIPP Facility**

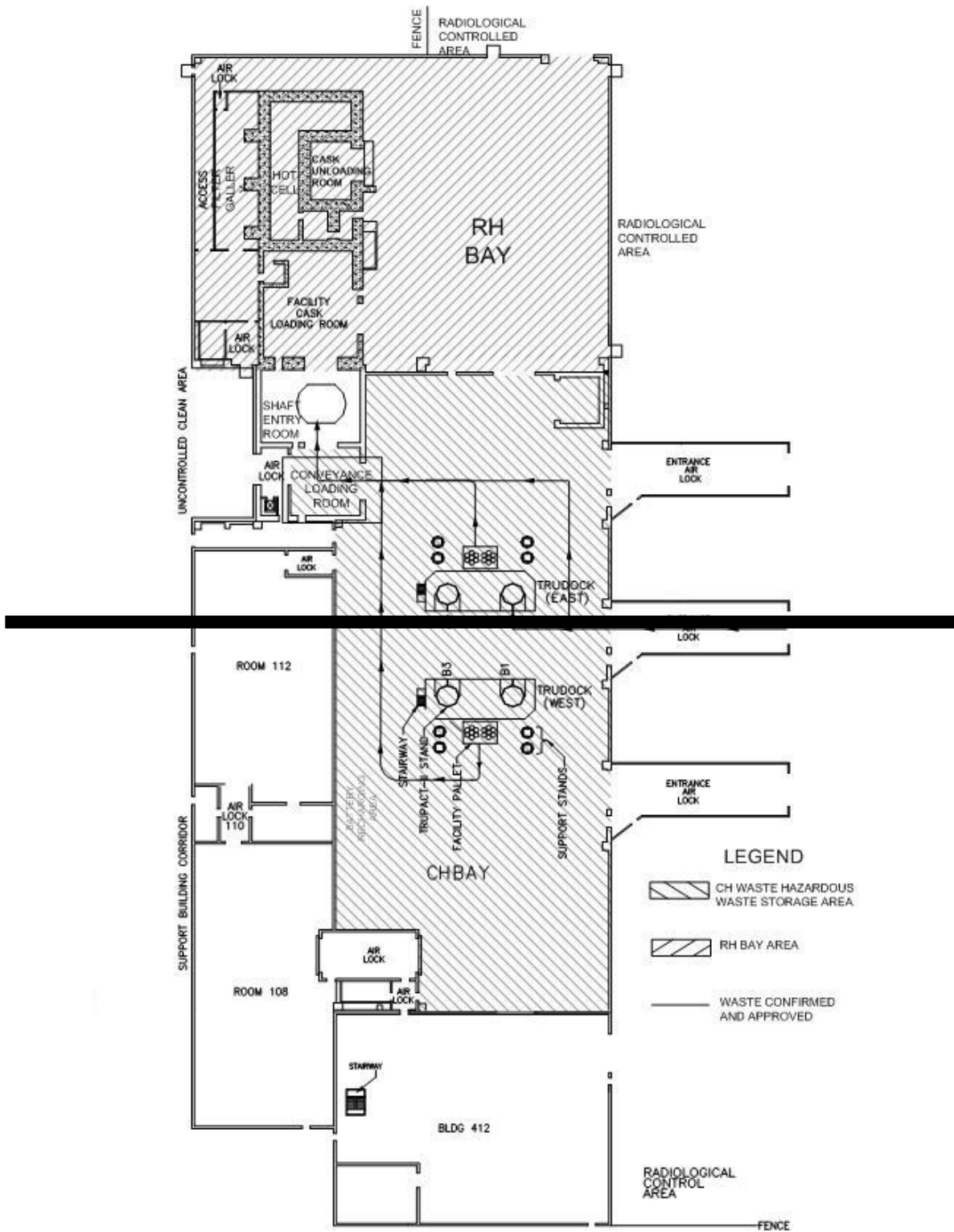
Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
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 October 2024/December 2022 Renewal Draft Permit



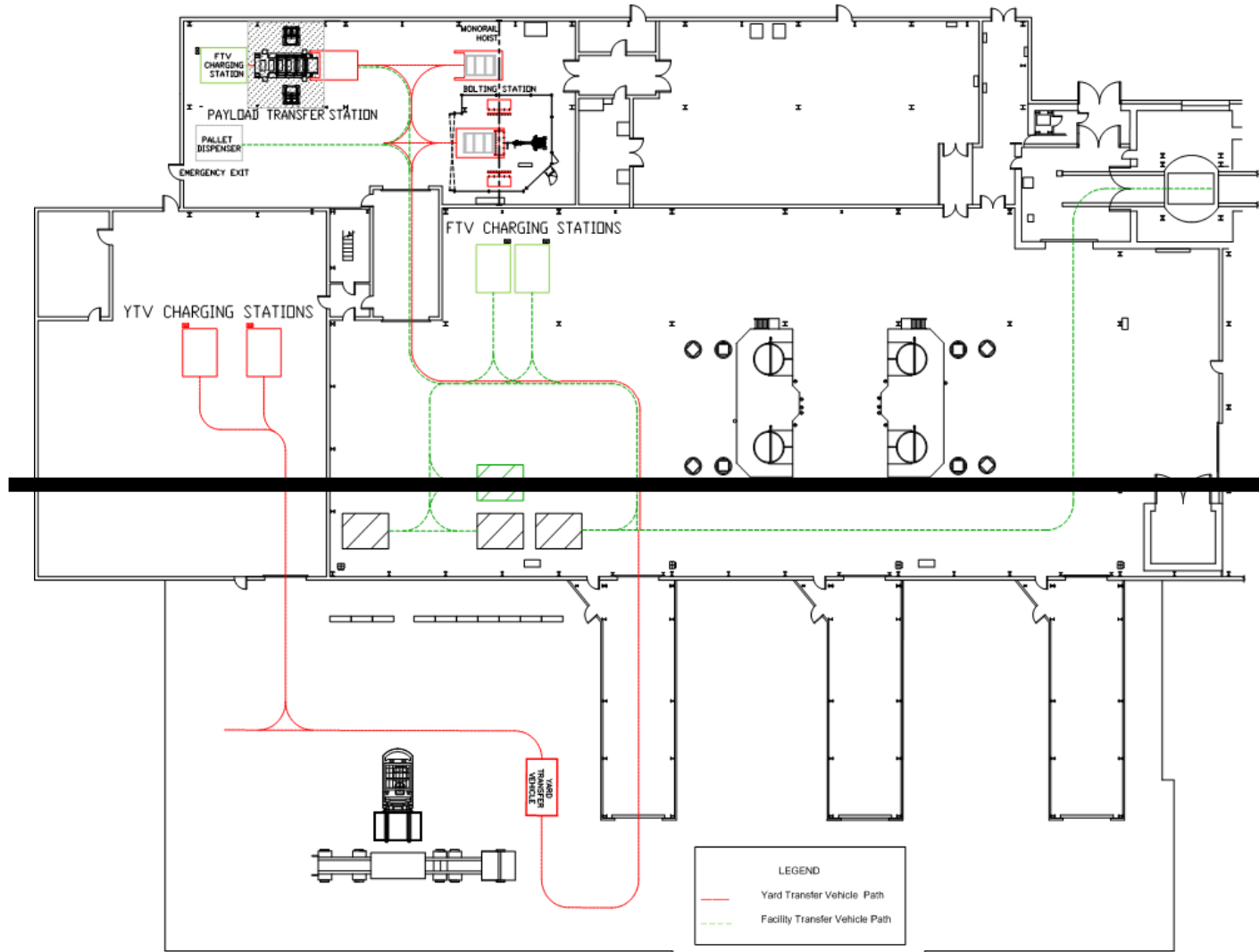
**Figure A4-2**  
**WIPP Traffic Flow Diagram**



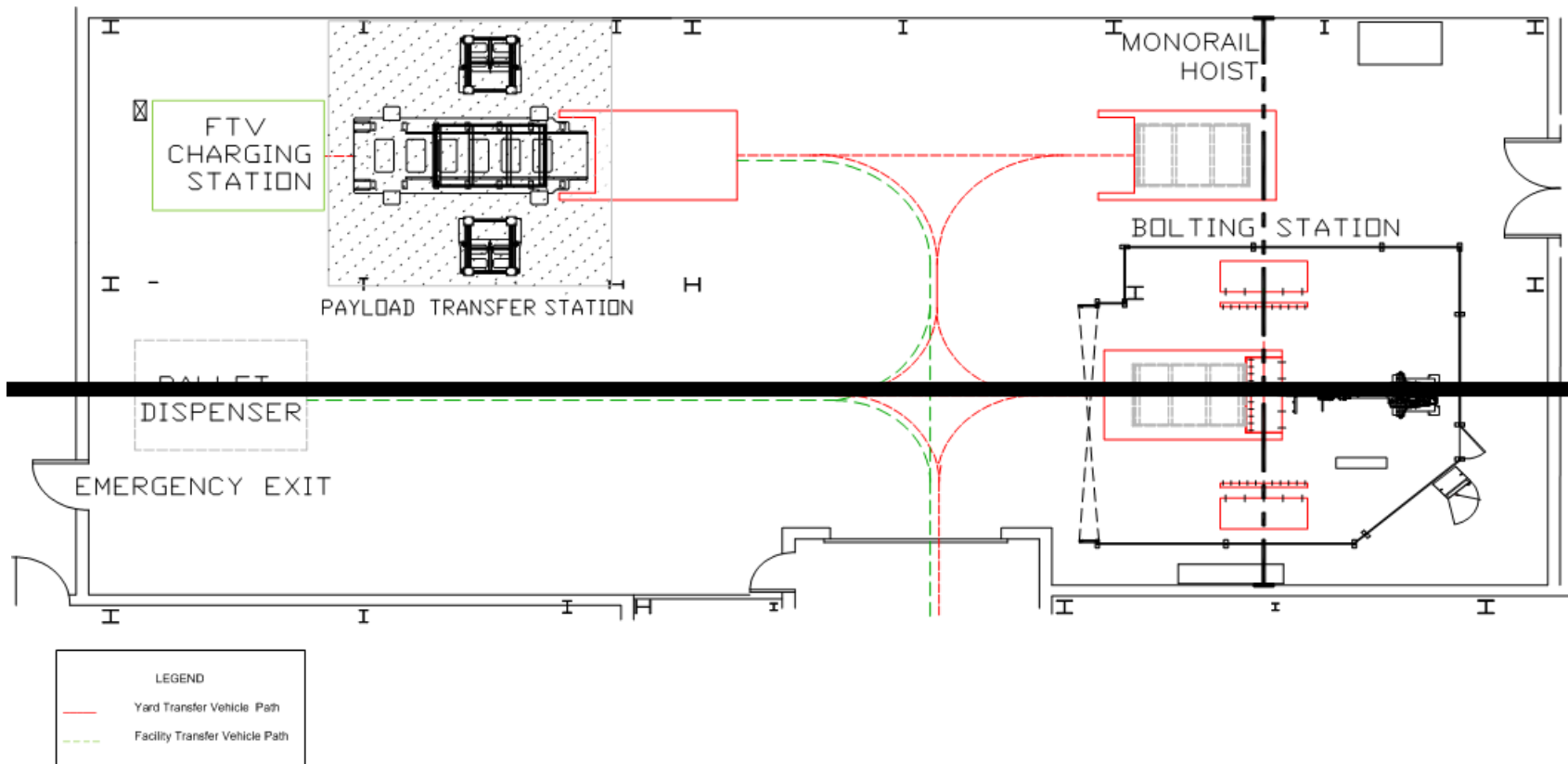
**Figure A4-2-NFB**  
**WIPP Traffic Flow Diagram with Building 416**



**Figure A4-3**  
**Waste Transport Routes in Waste Handling Building—Container Storage Unit**



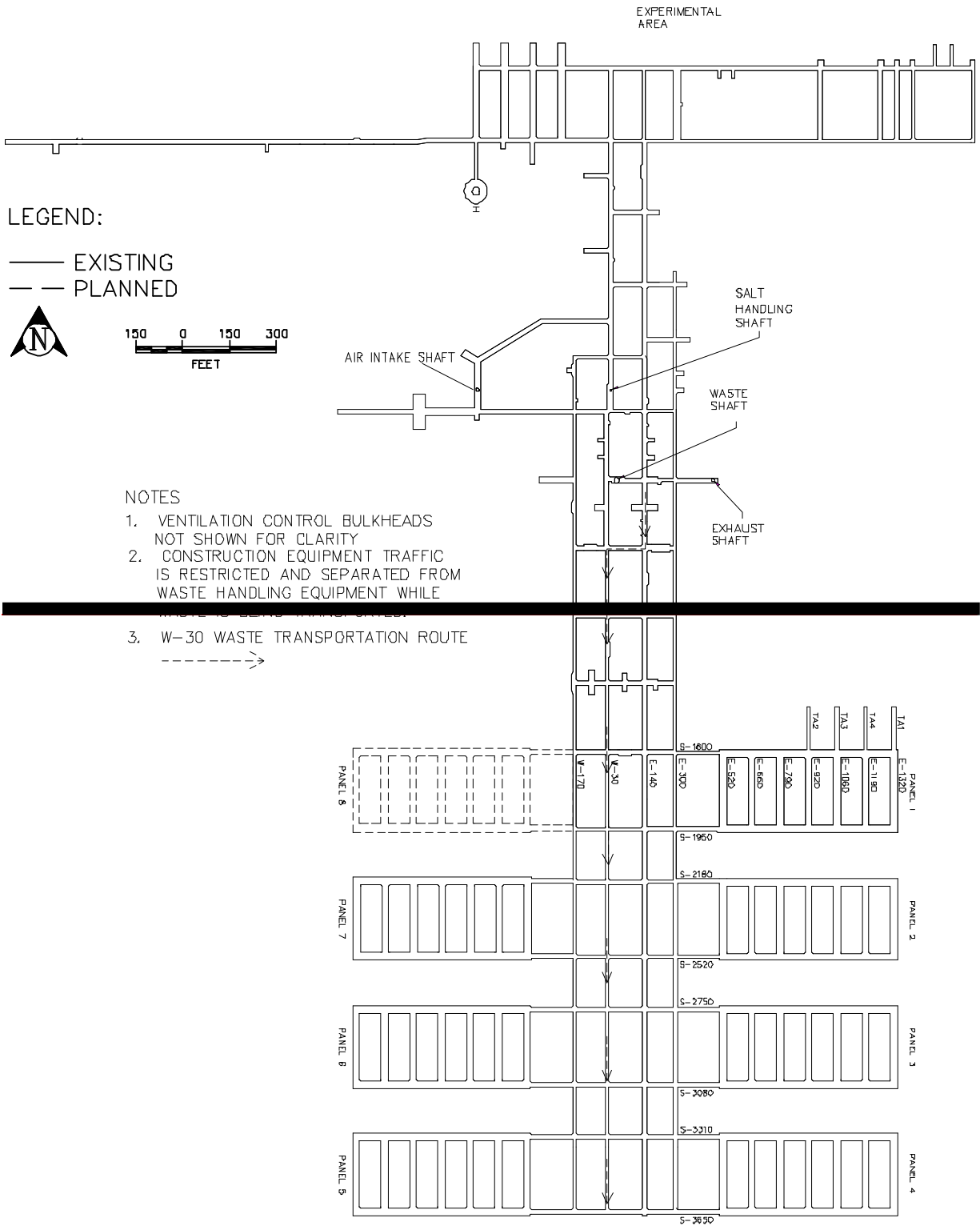
**Figure A4-3a**  
**Typical Transport Route for TRUPACT-III and Standard Large Box 2**



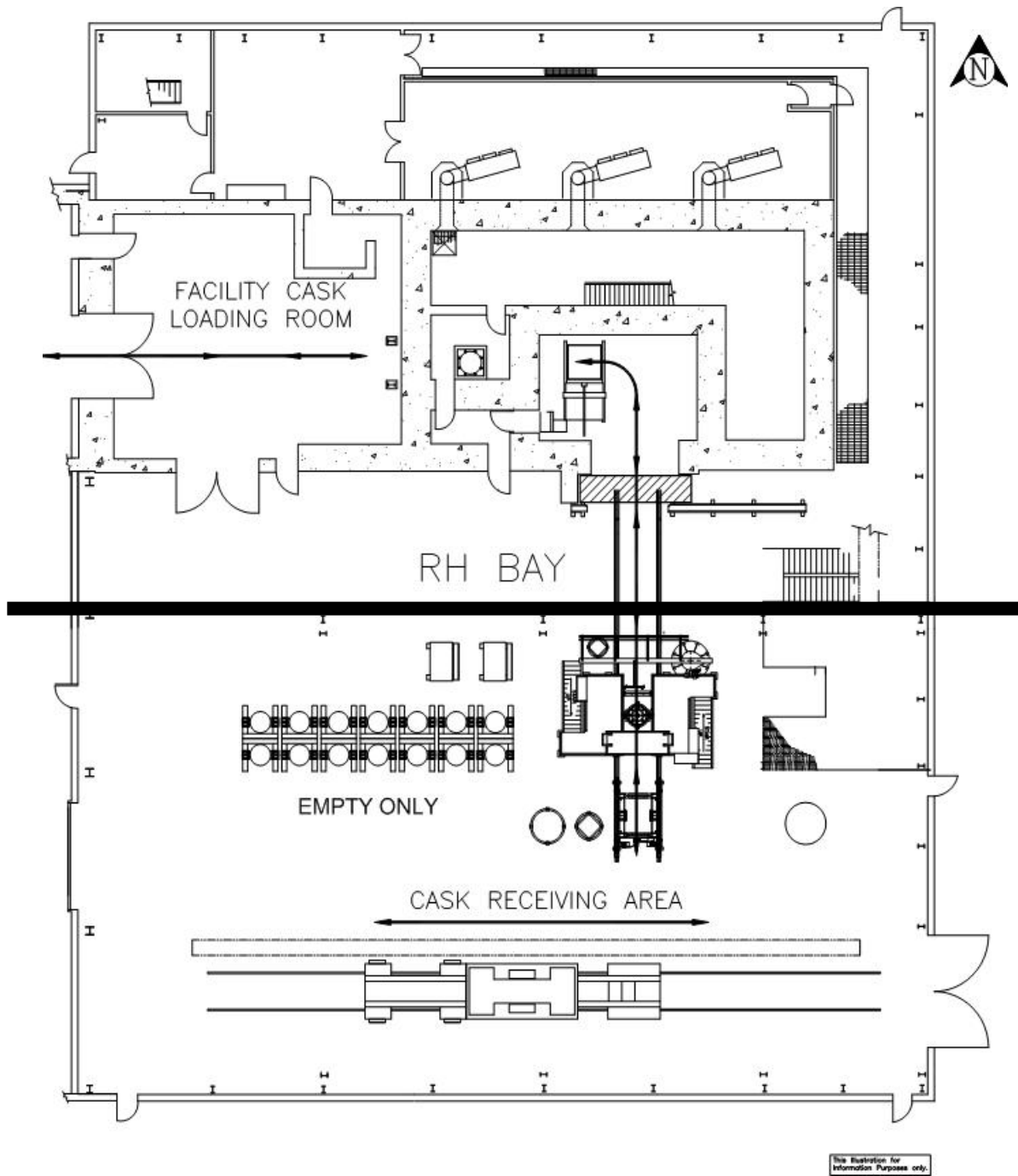
**Figure A4-3b**  
**Typical Transport Route for TRUPACT-III and Standard Large Box 2 in Room 108**



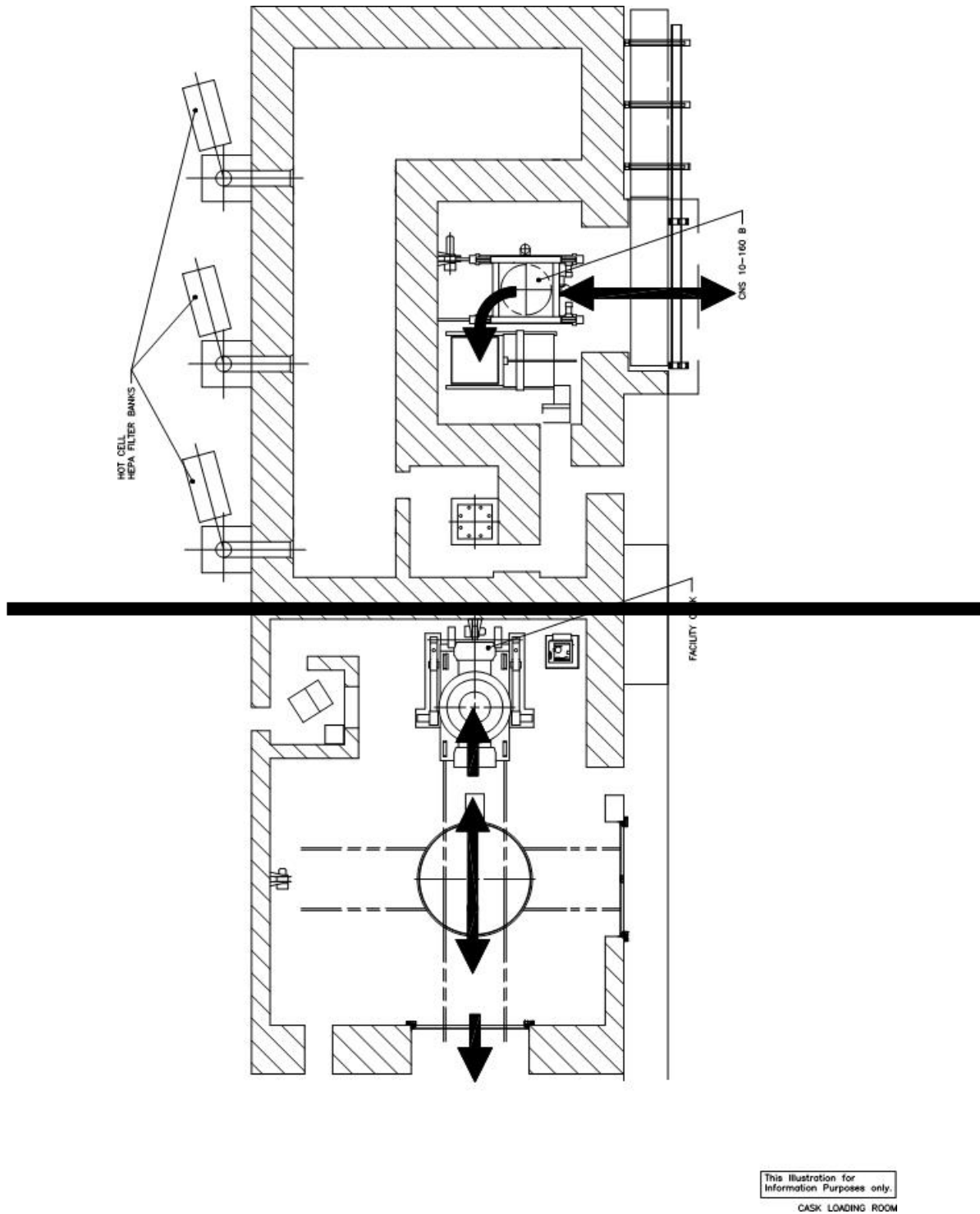




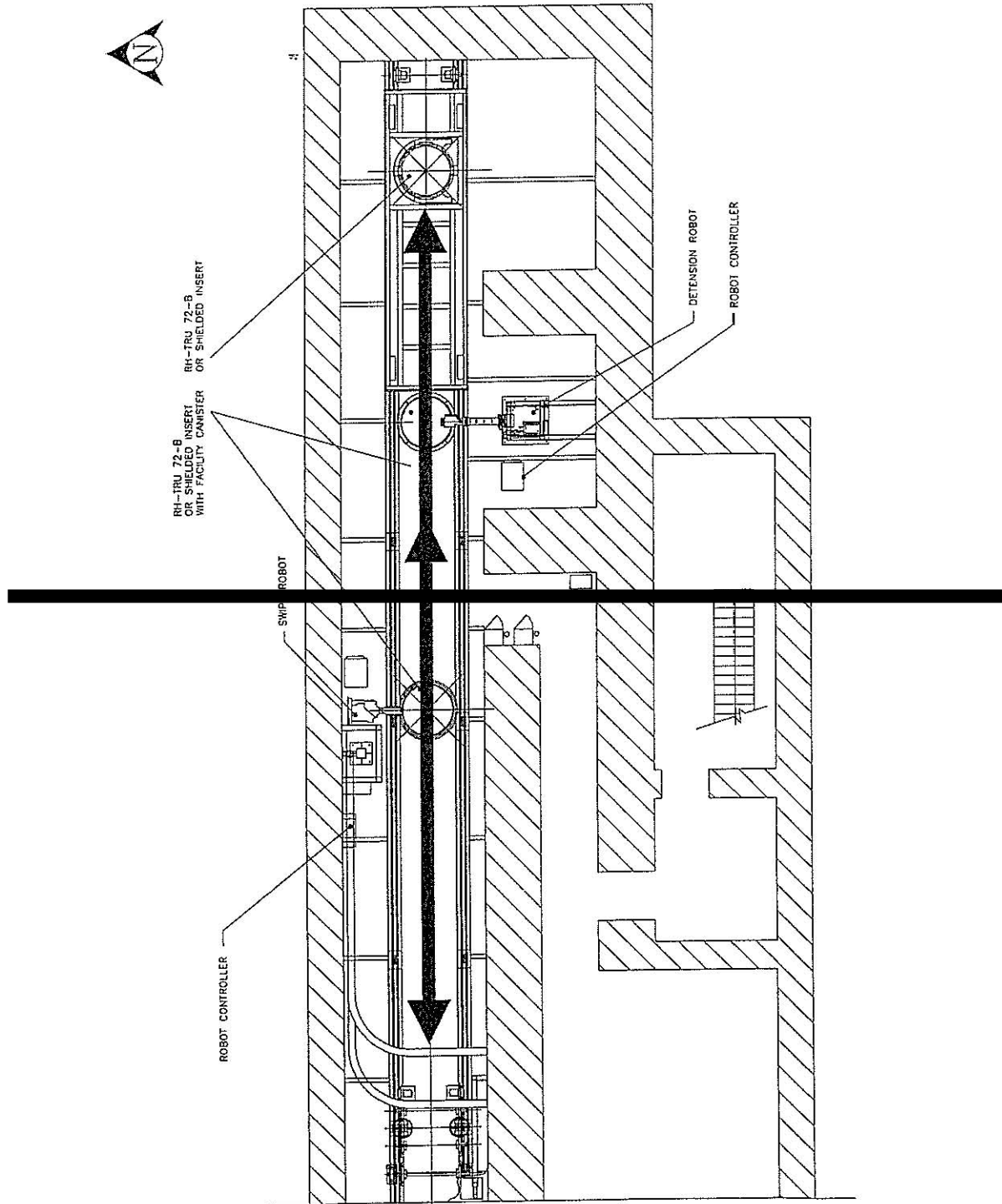
**Figure A4-4a**  
**Typical Underground Transport Route Using W-30**



**Figure A4-5**  
**RH Bay Waste Transport Routes**



**Figure A4-6**  
**RH Bay Cask Loading Room Waste Transport Route**



**Figure A4-7**  
**RH-Bay Canister Transfer Cell Waste Transport Route**

**ATTACHMENT C**  
**WASTE ANALYSIS PLAN**

## ATTACHMENT C

### WASTE ANALYSIS PLAN

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## ATTACHMENT C

### WASTE ANALYSIS PLAN

#### C-0 Introduction and Attachment Highlights

This waste analysis plan (**WAP**) has been prepared for management, storage, or disposal activities to be conducted at the Waste Isolation Pilot Plant (**WIPP**) facility to meet requirements set forth in 20.4.1.500 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal Regulations (CFR) §264.13). Guidance in the most recent U.S. Environmental Protection Agency (**EPA**) manual on waste analysis has been incorporated into the preparation of this WAP (EPA, 19942015). This WAP includes test methods and details of planned waste analysis for complying with the general waste analysis requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.13), a description of the waste shipment screening and verification process, and a description of the quality assurance (**QA**)/quality control (**QC**) program. Before the Permittees manage, store, or dispose transuranic (**TRU**) mixed waste from a generator/storage site (**site**), the Permittees shall require that site to implement the applicable requirements of this WAP.

~~TRU~~Transuranic mixed waste that may be stored or disposed at the WIPP facility are or were generated at U.S. Department of Energy (**DOE**) generator/storage sites by various specific processes and activities. Examples of the major types of operations that generate this waste include:

- Production of Nuclear Products—Production of nuclear products includes reactor operation, radionuclide separation/finishing, and weapons fabrication and manufacturing. The majority of the TRU mixed waste was generated by weapons fabrication and radionuclide separation/finishing processes. More specifically, wastes consist of residues from chemical processes, air and liquid filtration, casting, machining, cleaning, product quality sampling, analytical activities, and maintenance and refurbishment of equipment and facilities.
- Plutonium Recovery—Plutonium recovery wastes are residues from the recovery of plutonium-contaminated molds, metals, glass, plastics, rags, salts used in electrorefining, precipitates, firebrick, soot, and filters.
- Research and Development (**R&D**)—R&D projects include a variety of hot cell or glovebox activities that often simulate full-scale operations described above, producing similar TRU mixed wastes. Other types of R&D projects include metallurgical research, actinide separations, process demonstrations, and chemical and physical properties determinations.
- Decontamination and Decommissioning—Facilities and equipment that are no longer needed or usable are decontaminated and decommissioned, resulting in TRU mixed wastes consisting of scrap materials, cleaning agents, tools, piping, filters, Plexiglas™, gloveboxes, concrete rubble, asphalt, cinder blocks, and other building materials. These materials are expected to be the largest category by volume of TRU mixed waste to be generated in the future.

1 ~~TRU-Transuranic~~ mixed waste contains both TRU radioactive and hazardous components, as  
2 defined in Permit Part 1, Section 1.5.7. It is designated and separately packaged as either  
3 contact-handled (**CH**) waste or remote-handled (**RH**) waste, based on the radiological dose rate  
4 at the surface of the waste container.

5 The hazardous components of the TRU mixed waste to be managed at the WIPP facility are  
6 designated in Table C-5. Some of the waste may also be identified by unique state hazardous  
7 waste codes or numbers. These wastes are acceptable at the WIPP facility as long as the  
8 Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (**TSDF-WAC**) in Permit  
9 Part 2 are met. This WAP describes the measures that will be taken to ensure that the TRU  
10 mixed wastes received at the WIPP facility are within the scope of Table C-5 as established by  
11 20.4.1.500 NMAC (incorporating 40 CFR §Part 264), and that they comply with unit-specific  
12 requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart X§264.600),  
13 Miscellaneous Units).

14 ~~Some TRU mixed waste is retrievably stored at the DOE generator/storage sites. Additional~~  
15 ~~TRU mixed waste will be generated and packaged into containers at these generator/storage~~  
16 ~~sites in the future. TRU mixed waste will be retrieved from storage areas at a DOE~~  
17 ~~generator/storage site.~~ Retrievably stored waste is defined as TRU mixed waste generated after  
18 1970 and before the New Mexico Environment Department (**NMED**) notifies the Permittees, by  
19 approval of the final audit report, that the characterization requirements of the WAP at a  
20 generator/storage site have been implemented. Newly generated waste is defined as TRU  
21 mixed waste generated after NMED approves the final audit report for a generator/storage site.  
22 Acceptable knowledge (**AK**) information is assembled for both retrievably stored and newly  
23 generated waste. Waste characterization of retrievably stored TRU mixed waste ~~will be~~  
24 performed on an ongoing basis, as the waste is retrieved. Waste characterization of newly  
25 generated TRU mixed waste is typically performed as it is generated, although some  
26 characterization occurs post-generation.

27 Waste characterization is defined in Permit Part 1 as the activities performed by the waste  
28 generator to satisfy the general waste analysis requirements of 20.4.1.500 NMAC (incorporating  
29 40 CFR §264.13(a)) before waste containers have been certified for disposal at the WIPP  
30 facility. The characterization process for WIPP waste is presented in Figure C-2.  
31 Generator/storage site waste characterization programs are first audited by DOE, with NMED  
32 approving the final audit report. After this, generator/storage sites determine whether AK alone  
33 is sufficient for characterization, or whether radiography or visual examination (VE) in  
34 conjunction with AK is necessary to adequately characterize wastes. If an AK Sufficiency  
35 Determination is sought, information is provided to the Permittees for their review and DOE's  
36 provisional approval. ~~;~~ An NMED determination of adequacy of the AK information is required  
37 before final approval by the DOE. If the radiography or VE route is chosen, sites proceed to  
38 perform radiography or VE in conjunction with AK and in accordance with this WAP. Once an  
39 AK Sufficiency Determination is obtained, or when required radiography or VE data are  
40 obtained, sites ~~would~~ then prepare and submit the Waste Stream Profile Form (**WSPF**) for the  
41 DOE's approval. Once the WSPF is approved, a site may ship waste to the WIPP facility. The  
42 Permittees will perform waste confirmation prior to shipment of the waste from the  
43 generator/storage site to the WIPP facility pursuant to Permit Attachment C7, by performing  
44 radiography or visual examination of a representative subpopulation of certified waste  
45 containers, to ensure that the wastes meet the applicable requirements of the TSDF-WAC.

1 C-0a Waste Characterization

2 Characterization requirements for individual containers of TRU mixed waste are specified on a  
3 waste stream basis. A waste stream is defined as waste materials that have common physical  
4 form, that contain similar hazardous constituents, and that are generated from a single process  
5 or activity. Waste streams are ~~grouped by~~assigned to Waste Matrix Code Groups related to the  
6 physical and chemical properties of the waste. Generator/storage sites shall use the  
7 characterization techniques described in this WAP to assign appropriate Waste Matrix Code  
8 Groups to waste streams for WIPP disposal. The Waste Matrix Code Groups are solidified  
9 inorganics, solidified organics, salt waste, soils, lead/cadmium metal, inorganic nonmetal waste,  
10 combustible waste, graphite, filters, heterogeneous debris waste, and uncategorized metal.  
11 Waste Matrix Code Groups can be grouped into three Summary Category groups:  
12 Homogeneous Solids (Summary Category S3000), Soil/Gravel (Summary Category S4000),  
13 and Debris Waste (Summary Category S5000).

14 ~~Transuranic~~TRU mixed wastes are initially categorized into the three broad Summary Category  
15 Groups that are related to the final physical form of the wastes. This categorization is based on  
16 the Summary Category Group constituting the greatest volume of waste for a waste stream.  
17 Waste characterization requirements for these groups are specified in Section C-2 of this WAP.  
18 Each of the three groups is described below.

19 S3000 - Homogeneous Solids

20 Homogeneous solids are defined as solid materials, excluding soil, that do not meet the  
21 NMED criteria for classification as debris (20.4.1.800 NMAC (incorporating 40 CFR  
22 §268.2[g] and [h])). Included in the series of homogeneous solids are inorganic process  
23 residues, inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams  
24 are included in this Summary Category Group based on the specific waste stream types  
25 and final waste form. This Summary Category Group is expected to contain toxic metals  
26 and spent solvents. This category includes wastes that are at least 50 percent by volume  
27 homogeneous solids.

28 S4000 - Soils/Gravel

29 This Summary Category Group includes S4000 waste streams that are at least 50 percent  
30 by volume soil/gravel. This Summary Category Group is expected to contain toxic metals.

31 S5000 - Debris ~~Wastes~~Waste

32 This Summary Category Group includes heterogeneous waste that is at least 50 percent  
33 by volume materials that meet the criteria specified in 20.4.1.800 NMAC (incorporating 40  
34 CFR §268.2 (g)). Debris means solid material exceeding a 2.36 inch (~~in-~~) (60 millimeter)  
35 particle size that is intended for disposal and that is:

- 36 1. a manufactured object, or
- 37 2. plant or animal matter, or
- 38 3. natural geologic material.

39 Particles smaller than 2.36 inches in size may be considered debris if the debris is a  
40 manufactured object and if it is not a particle of S3000 or S4000 material.

41 The most common hazardous constituents in the TRU mixed waste to be managed in the WIPP  
42 facility consist of the following:

## 1 Metals

2 Some of the TRU mixed waste to be emplaced in the WIPP facility contains metals for  
3 which 20.4.1.200 NMAC (incorporating 40 CFR §261.24), toxicity characteristics ~~are~~  
4 established (EPA hazardous waste numbers D004 through D011). Cadmium, chromium,  
5 lead, mercury, selenium, and silver are present in discarded tools and equipment,  
6 solidified sludges, cemented laboratory liquids, and waste from decontamination and  
7 decommissioning activities. A large percentage of the waste consists of lead-lined  
8 gloveboxes, leaded rubber gloves and aprons, lead bricks and piping, lead tape, and other  
9 lead items. Lead, because of its radiation-shielding applications, is the most prevalent  
10 toxicity-characteristic metal present.

## 11 Halogenated Volatile Organic Compounds

12 Some of the TRU mixed waste to be emplaced in the WIPP facility contains spent  
13 halogenated volatile organic compound (VOC) solvents identified in 20.4.1.200 NMAC  
14 (incorporating 40 CFR, §261.31) (EPA hazardous waste numbers F001 through F005).  
15 Tetrachloroethylene; trichloroethylene; methylene chloride; carbon tetrachloride; 1,1,1-  
16 trichloroethane; and 1,1,2-trichloro-1,2,2-trifluoroethane (EPA hazardous waste numbers  
17 F001 and F002) are the most prevalent halogenated organic compounds identified in TRU  
18 mixed waste that may be managed at the WIPP facility during the Disposal Phase. These  
19 compounds are commonly used to clean metal surfaces prior to plating, polishing, or  
20 fabrication; to dissolve other compounds; or as coolants. Because they are highly volatile,  
21 only small amounts typically remain on equipment after cleaning or, in the case of treated  
22 wastewaters, in the sludges after clarification and flocculation. ~~Radiolysis may also~~  
23 ~~generate halogenated volatile organic compounds.~~

## 24 Nonhalogenated Volatile Organic Compounds

25 Xylene, methanol, and n-butanol are the most prevalent nonhalogenated VOCs in TRU  
26 mixed waste that may be managed at the WIPP facility during the Disposal Phase. Like  
27 the halogenated VOCs, they are used as degreasers and solvents and are similarly  
28 volatile. The same analytical methods that are used for halogenated VOCs are used to  
29 detect the presence of nonhalogenated VOCs. ~~Radiolysis may also generate non-~~  
30 ~~halogenated volatile organic compounds.~~

31 The generator/storage sites shall characterize their waste in accordance with this WAP and  
32 associated Permit Attachments; and ensure that waste proposed for storage and disposal at ~~the~~  
33 WIPP ~~facility~~ meets the applicable requirements of the TSDF-WAC in ~~Permit Part 2, Section~~  
34 ~~2.3.3~~. The generator/storage site shall assemble the ~~Acceptable Knowledge (AK)~~ information  
35 into an auditable record<sup>1</sup> for the waste stream as described in Permit Attachment C4. For those  
36 waste streams with an approved AK Sufficiency Determination (see below), radiography or VE  
37 per the methods described in Permit ~~Attachments~~~~Attachment~~ C1 is not required.

38 ~~All waste~~~~Waste~~ characterization activities specified in this WAP and associated Permit  
39 Attachments shall be carried out at generator/storage sites in accordance with this WAP. ~~The~~

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<sup>1</sup> "Auditable records" mean those records which allow the Permittees to conduct a systematic assessment, analysis, and evaluation of the Permittees' compliance with the WAP and this Permit.

1 DOE will audit generator/storage site waste characterization programs and activities as  
2 described in Section C-3. Waste characterization activities at the generator/storage sites include  
3 the following, as discussed in Section C-3:

- 4 • Radiography, which is an x-ray technique to determine physical contents of containers
- 5 • Visual examination of opened containers as an alternative way to determine their  
6 physical contents
- 7 • Compilation of AK documentation into an auditable record

#### 8 C-0b AK Sufficiency Determination

9 Generator/storage sites may submit a request to the Permittees for an AK Sufficiency  
10 Determination (Determination Request) to be exempt from the requirement to perform  
11 radiography or ~~visual examination (VE)~~ based on AK. The contents of the Determination  
12 Request are specified in Permit Attachment C4, Section C4-3d.

13 The Permittees shall evaluate the Determination Request for completeness and technical  
14 adequacy. This evaluation shall include, but not be limited to, whether the Determination  
15 Request is technically sufficient for the following:

- 16 • ~~The~~ The Determination Request must include ~~all~~ information specified in Permit  
17 Attachment C4, Section C4-3d
- 18 • ~~The~~ The AK Summary must identify relevant hazardous constituents, and must  
19 correctly identify ~~all~~ toxicity characteristic and listed hazardous waste numbers.
- 20 • ~~All hazardous~~ Hazardous waste number assignments must be substantiated by  
21 supporting data and, if not, whether this lack of substantiation compromises the  
22 interpretation.
- 23 • ~~Resolution of data discrepancies between different AK sources must be technically~~  
24 Resolution of data discrepancies between different AK sources must be technically  
correct and documented.
- 25 • ~~The~~ The AK Summary must include ~~all~~ the identification of waste material parameter  
26 weights by percentage of the material in the waste stream, and determinations  
27 must be technically correct.
- 28 • ~~All prohibited~~ Prohibited items specified in the TSDF-WAC should be addressed,  
29 and conclusions drawn must be technically adequate and substantiated by  
30 supporting information.
- 31 • ~~If the~~ If the AK record includes process control information specified in Permit  
32 Attachment C4, Section C4-3b, the information should include procedures, waste  
33 manifests, or other documentation demonstrating that the controls were adequate  
34 and sufficient.



- 1           • The site must provide the supporting information necessary to substantiate  
2           technical conclusions within the Determination Request, and this information must  
3           be correctly interpreted.

4           The Permittees will review the Determination Request for technical adequacy and compliance  
5           with the requirements of the Permit, using trained and qualified individuals in accordance with  
6           standard operating procedures (SOP) that shall, at a minimum, address ~~all of~~ the technical and  
7           procedural requirements listed above. The Permittees shall resolve comments with the  
8           generator/storage site.

9           If the DOE determines that the AK is sufficient, it shall inform the public of the Determination  
10          Request, the Permittees' evaluation of it, and the date and time of a public meeting to provide  
11          information to and solicit comments from interested members of the public regarding the  
12          Determination Request. Notice of the meeting and comment period shall be provided by the  
13          following methods:

- 14           1.       Written notice to ~~all~~ individuals on the facility mailing list;
- 15           2.       Public notice in area newspapers, including the Carlsbad Current-Argus,  
16           Albuquerque Journal, and Santa Fe New Mexican
- 17           3.       Notice as specified in Permit Part 1, Section 1.11 on the WIPP Home Page;
- 18           4.       E-mail notification as specified in Permit Part 1, Section 1.11.

19          The DOE shall take written comment on the Determination Request for at least 30 days  
20          following the public meeting. DOE shall compile ~~all~~ such comments, including any disagreement  
21          between the DOE and commenters.

22          If the DOE provisionally approves the Determination Request, it may forward it along with ~~all~~  
23          relevant information submitted with the Determination Request to NMED for an evaluation that  
24          the provisional approval made by DOE is adequate. The DOE shall also provide to NMED, as a  
25          separate appendix to the Determination Request, the compilation of ~~all~~ comments and DOE's  
26          response to each comment. After submitting a Determination Request to the NMED, the  
27          Permittees will post a link to the transmittal letter to the NMED as specified in Permit Part 1,  
28          Section 1.11. on the WIPP Home Page and inform those on the e-mail notification list as  
29          specified in Permit Section 1.11. The NMED will evaluate the Determination Request, determine  
30          the adequacy of the Determination Request, and notify the DOE as to whether or not it concurs  
31          with its provisional approval. Based on the results of NMED's evaluation, the Permittees will  
32          notify the generator/storage sites whether the AK information is sufficient and the Determination  
33          Request is approved. The DOE will not approve a Determination Request that NMED has  
34          determined to be inadequate unless the generator/storage site resolves the inadequacies and  
35          provides the resolution to NMED for evaluation of adequacy. Should the inadequacies not be  
36          resolved to NMED's satisfaction, the DOE shall not submit a Determination Request for the  
37          same waste stream at a later date. The DOE shall not submit a Determination Request if a  
38          previous Determination Request is pending evaluation by the NMED.

39          In the event the DOE disagrees, in whole or in part, with an evaluation performed by the NMED  
40          resulting in a determination by the NMED that the DOE's provisional approval for a particular  
41          waste stream is inadequate, DOE may seek dispute resolution. The dispute resolution process



1 is specified in Permit Part 1, Section 1.16. The Secretary's final decision under Permit Part 1,  
2 Section 1.16.4 shall constitute a final agency action.

3 By July 1 of each year, the Permittees shall submit to the NMED a list of waste streams that the  
4 Permittees may submit for an AK Sufficiency Determination during the upcoming federal fiscal  
5 year, only if there are actual plans to seek an AK Sufficiency Determination; otherwise, no  
6 action is required. The Permittees will post a link to the transmittal letter to the NMED and  
7 announce a public meeting to discuss the list with interested members of the public on the  
8 WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section  
9 1.11.

10 If a generator/storage site does not submit a Determination Request, or if the DOE does not  
11 approve a Determination Request, or if the NMED finds that the DOE's provisional approval of a  
12 Determination Request is inadequate, the generator/storage site shall perform radiography or  
13 VE on 100% of the containers in a waste stream.

14 If a generator/storage site submits a Determination Request, the DOE provisionally approves  
15 the Determination Request and the NMED finds that the DOE's provisional approval is  
16 adequate, neither radiography nor VE of the waste stream is required.

#### 17 C-0c Waste Stream Profile Form Completion

18 After a complete AK record has been compiled and either a Determination Request has been  
19 approved by the DOE or the generator/storage site has completed the applicable testing  
20 requirements specified in Permit Attachments C1, the generator/storage site will complete a  
21 ~~Waste Stream Profile Form (WSPF)~~ and a Characterization Information Summary (**CIS**). The  
22 requirements for the completion of a WSPF and a CIS are specified in Permit Attachment C3,  
23 Sections C3-6b(1) and C3-6b(2) respectively.

24 The WSPF and the CIS for the waste stream resulting from waste characterization activities  
25 shall be transmitted to the Permittees, who shall review them for completeness, and screen  
26 them for acceptance prior to loading any TRU mixed waste into the ~~Contact-Handled~~CH or  
27 ~~Remote-Handled~~RH Packaging at the generator facility, as described in Section C-4. The  
28 review and approval process will ensure that the submitted waste analysis information is  
29 sufficient to meet the Data Quality Objectives (**DQOs**) for AK in Section C-4a(1) and allow the  
30 Permittees to demonstrate compliance with the requirements of this WAP. Only TRU mixed  
31 waste and TRU waste that has been characterized in accordance with this WAP and that meets  
32 the TSDf-WAC specified in this Permit will be accepted at the WIPP facility for disposal in a  
33 permitted Underground Hazardous Waste Disposal Unit (**HWDU**). The DOE will approve and  
34 provide NMED with copies of the approved WSPF and accompanying CIS prior to waste stream  
35 shipment. Upon notification of the DOE's approval of the WSPF, the generator/storage site may  
36 be authorized to ship waste to the WIPP facility.

37 In the event the Permittees request detailed information on a waste stream, the site will provide  
38 a Waste Stream Characterization Package (Permit Attachment C3, Section C3-6b(32)). For  
39 each waste stream, this package will include the WSPF, the CIS, and the complete AK  
40 summary. The Waste Stream Characterization Package will also include specific Batch Data  
41 Reports (**BDRs**) and raw data associated with waste container characterization as requested by  
42 the Permittees.

1 C-0d Waste Confirmation

2 The Permittees will perform waste confirmation on a representative subpopulation of each  
3 waste stream shipment after certification and prior to shipment pursuant to Permit Attachment  
4 C7. The Permittees will use radiography, review of radiography audio/video recordings, VE, or  
5 review of VE records (e.g., VE data sheets or packaging logs) to examine at least ~~7~~seven  
6 percent of each waste stream shipment to confirm that the waste does not contain ignitable,  
7 corrosive, or reactive waste. Waste confirmation will be performed by the Permittees prior to  
8 shipment of the waste from the generator/storage site to the WIPP facility.

9 C-1 Identification of TRU Mixed Waste to be Managed at the WIPP Facility

10 C-1a Waste Stream Identification

11 ~~TRU~~Transuranic mixed waste destined for disposal at the WIPP facility will be characterized on  
12 a waste stream basis. Generator/storage sites will delineate waste streams using ~~acceptable~~  
13 ~~knowledge~~AK. Required ~~acceptable knowledge~~AK is specified in Section C-3a and Permit  
14 Attachment C4.

15 C-1b Waste Summary Category Groups and Hazardous Waste Accepted at the WIPP Facility

16 Once a waste stream has been delineated, generator/storage sites will assign a Waste Matrix  
17 Code to the waste stream based on the physical form of the waste. Waste streams are then  
18 assigned to one of three broad Summary Category Groups: S3000-Homogeneous Solids,  
19 S4000-Soils/Gravel, and S5000-Debris Waste. These Summary Category Groups are used to  
20 determine further characterization requirements.

21 The Permittees will only allow generators to ship those TRU mixed waste streams with EPA  
22 hazardous waste numbers listed in Table C-5. Some of the waste may also be identified by  
23 unique state hazardous waste codes or numbers. These wastes are acceptable at the WIPP  
24 facility as long as the TSDf-WAC are met. The Permittees will require sites to perform  
25 characterization of ~~all~~ waste streams as required by this WAP. If during the characterization  
26 process, new EPA hazardous waste numbers are identified, those wastes will be prohibited for  
27 disposal at the WIPP facility until a permit modification has been submitted to and approved by  
28 NMED for these new EPA hazardous waste numbers. Similar waste streams at other  
29 generator/storage sites will be examined by the Permittees to ensure that the newly identified  
30 EPA hazardous waste numbers do not apply to those similar waste streams. If the other waste  
31 streams also require new EPA hazardous waste numbers, shipment of these similar waste  
32 streams will also be prohibited for disposal at the WIPP facility until a permit modification has  
33 been submitted to and approved by the NMED.

34 C-1c Waste Prohibited at the WIPP Facility

35 The following TRU mixed ~~waste-wastes~~ are prohibited at the WIPP facility:

- 36 • liquid waste is not acceptable at the WIPP facility. Liquid in the quantities delineated  
37 below is acceptable:
  - 38 – Observable liquid shall be no more than ~~4~~one percent by volume of the outermost  
39 container at the time of radiography or visual examination

- 1           – Internal containers with more than 60 milliliters or ~~3~~three percent by volume
- 2            observable liquid, whichever is greater, are prohibited
  
- 3           – Containers with Hazardous Waste Number U134 assigned shall have no
- 4            observable liquid
  
- 5           – Overpacking the outermost container that was examined during radiography or
- 6            visual examination or redistributing untreated liquid within the container shall not be
- 7            used to meet the liquid volume limits
  
- 8           • non-radionuclide pyrophoric materials, such as elemental potassium
  
- 9           • hazardous wastes not occurring as co-contaminants with TRU mixed wastes (non-
- 10          mixed hazardous wastes)
  
- 11          • wastes incompatible with backfill, seal and panel closures materials, container and
- 12          packaging materials, shipping container materials, or other wastes
  
- 13          • wastes containing explosives or compressed gases
  
- 14          • wastes with polychlorinated biphenyls (**PCBs**) not authorized under an EPA PCB
- 15          waste disposal authorization
  
- 16          • wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA
- 17          Hazardous Waste Numbers of D001, D002, or D003)
  
- 18          • waste that has ever been managed as high-level waste and waste from tanks specified
- 19          in Table C-4, unless specifically approved through a Class 3 permit modification
  
- 20          • any waste container from a waste stream (or waste stream lot) which has not
- 21          undergone either radiographic or visual examination of a statistically representative
- 22          subpopulation of the waste stream in each shipment, pursuant to Permit Attachment
- 23          C7
  
- 24          • any waste container from a waste stream which has not been preceded by an
- 25          appropriate, certified WSPF (see Section C-1d)

26 Before accepting a container holding TRU mixed waste, the Permittees will perform waste  
27 confirmation activities pursuant to Permit Attachment C7 on each waste stream shipment to  
28 confirm that the waste does not contain ignitable, corrosive, or reactive waste and the assigned  
29 EPA hazardous waste numbers are allowed for storage and disposal by this Permit. Waste  
30 confirmation activities will be performed on at least ~~7~~seven percent of each waste stream  
31 shipped, equating to examination of at least one of fourteen containers in each waste stream  
32 shipment. If a waste stream shipment contains fewer than fourteen containers, one container  
33 will be examined to satisfy waste confirmation requirements. Section C-4 and Permit  
34 Attachment C7 include descriptions of the waste confirmation processes ~~that~~ the Permittees ~~will~~  
35 conduct prior to receiving a shipment at the WIPP facility.

36 Containers are vented through filters, allowing any gases that are generated by radiolytic and  
37 microbial processes within a waste container to escape, thereby preventing over pressurization

1 or development of conditions within the container that would lead to the development of  
2 ignitable, corrosive, reactive, or other characteristic wastes.

3 To ensure the integrity of the WIPP facility, waste streams identified to contain incompatible  
4 materials or materials incompatible with waste containers cannot be shipped to the WIPP facility  
5 unless they are treated to remove the incompatibility. Only those waste streams that are  
6 compatible or have been treated to remove incompatibilities will be shipped to the WIPP facility.

#### 7 C-1d Control of Waste Acceptance

8 Every waste stream shipped to the WIPP facility shall be preceded by a WSPF (Figure C-1) and  
9 a CIS. The required WSPF information and the CIS elements are found in Permit Attachment  
10 C3, Section C3-6b(1) and Section C3-6b(2).

11 Generator/storage sites will provide the WSPF to the Permittees for each waste stream prior to  
12 its acceptance for disposal at the WIPP facility. The WSPF and the CIS will be transmitted to the  
13 Permittees for each waste stream from a generator/storage site. If continued waste  
14 characterization reveals discrepancies that identify different EPA hazardous waste numbers or  
15 indicates that the waste belongs to a different waste stream, the waste will be redefined to a  
16 separate waste stream and a new WSPF submitted. Generator/storage sites will develop criteria  
17 to determine the specific circumstances under which a WSPF is revised versus when a new  
18 WSPF is required. These criteria will be evaluated by DOE during site audits (Attachment C6).

19 The Permittees are responsible for the review of WSPFs and CISs to verify compliance with the  
20 restrictions on TRU mixed wastes ~~destined for disposal at the WIPP facility. for WIPP disposal.~~  
21 The DOE will approve and submit completed WSPFs to the NMED prior to waste stream  
22 shipment. The Permittees will be responsible for the review of shipping records (Section C-5) to  
23 ensure that each waste container has been prepared and characterized in accordance with  
24 applicable provisions of this WAP. Waste characterization data shall ensure the absence of  
25 prohibited items specified in Section C-1c.

26 Any time the Permittees request additional information concerning a waste stream, the  
27 generator/storage site will provide a Waste Stream Characterization Package (Permit  
28 Attachment C3, Section C3-6b(32)). The option for the Permittees to request additional  
29 information ensures that the waste being offered for disposal is adequately characterized and  
30 accurately described on the WSPF.

31 The NMED retains the right, under the New Mexico Hazardous Waste Act at 74-4-13, which is  
32 cited in Permit Part 1, Section 1.1, to take action, such as issuing orders, to address evidence of  
33 an imminent and substantial endangerment to human health or the environment, including  
34 orders to suspend TRU mixed waste shipments and emplacement at the WIPP facility for  
35 cause. The Secretary reserves the right to prohibit shipment and emplacement of TRU mixed  
36 wastes at the WIPP facility for, but not limited to, the following reasons: (1) the Permittees have  
37 not satisfied any conditions of this Permit; (2) a TRU mixed waste stream or shipment may pose  
38 a threat to human health or the environment; (3) the Permittees are in violation of a Permit  
39 condition; or (4) based on any allegation of noncompliance. This attachment also requires that  
40 all waste shipped to the WIPP facility is compliant with the WAP contained herein and all  
41 shipments arriving at the WIPP facility go through a screening and verification process per  
42 Section C-5 before emplacement in a HWDU. NMED retains the right to suspend any and all  
43 waste shipments to the WIPP facility associated for not complying with the WAP.

1 C-1e Waste Generating Processes at the WIPP Facility

2 Waste generated as a result of the waste containers handling and processing activities at the  
3 WIPP facility is termed “derived” waste. Because derived wastes can contain only those RCRA-  
4 regulated materials present in the waste from which they were derived, no additional  
5 characterization of the derived waste is required for disposal purposes. In other words, the  
6 generator/storage site’s characterization data and knowledge of the processes at the WIPP  
7 facility will be used to identify and characterize hazardous waste and hazardous constituents in  
8 derived waste. The management of derived waste is addressed in Permit Attachment A1.

9 C-2 Waste Characterization Program Requirements and Waste Characterization Parameters

10 The Permittees shall require the sites to develop the procedure(s) which specify their  
11 programmatic waste characterization requirements. ~~The~~ DOE will evaluate the procedures  
12 during audits conducted under the Audit and Surveillance Program (Section C-5a(3)) and may  
13 also evaluate the procedures as part of the review and approval of the WSPF. Sites must notify  
14 the Permittees and obtain DOE approval prior to making data-affecting modifications to  
15 procedures (Permit Attachment C3, Section C3-9). Program procedures shall address the  
16 following minimum elements:

- 17 • Waste characterization and certification procedures for retrievably stored and newly  
18 generated wastes to be sent to the WIPP facility
- 19 • Methods used to ensure prohibited items are documented and managed-; ~~These~~ ~~these~~  
20 will include procedures for performing radiography, VE, or treatment, if these methods  
21 are used to ensure prohibited items are not present in the waste prior to shipment of  
22 the waste to the WIPP facility-
- 23 • Identify the organization(s) responsible for compliance with waste characterization and  
24 certification procedures-
- 25 • Identify the oversight procedures and frequency of actions to verify compliance with  
26 waste characterization and certification procedures-
- 27 • Develop training specific to waste characterization and certification procedures-
- 28 • Ensure that personnel may stop work if noncompliance with waste characterization or  
29 certification procedures is identified-
- 30 • Develop a nonconformance process that complies with the requirements in Permit  
31 Attachment C3 of the WAP to document and establish corrective actions.
- 32 • As part of the corrective action process, assess the potential time frame of the  
33 noncompliance, the potentially affected waste population(s), and the reassessment  
34 and recertification of those wastes-
- 35 • A listing of ~~all~~ approved EPA hazardous waste numbers which are acceptable at the  
36 WIPP facility are included in Table C-5-

1 For those waste streams or containers that are not amenable to radiography (e.g., RH TRU  
2 mixed waste, direct loaded ten-drum overpacks (**TDOPs**)) for waste confirmation by the  
3 Permittees pursuant to Permit Attachment C7, generator/storage site VE data may be used for  
4 waste acceptance. In those cases, the Permittees will review the generator/storage site VE  
5 procedures to ensure that data sufficient for the Permittees' waste acceptance activities  
6 pursuant to Permit Attachment C7 will be obtained and the procedures meet the minimum  
7 requirements for visual examination specified in Permit Attachment C1, Section C1-24.

8 The following waste characterization parameters shall be obtained from the generator/storage  
9 sites:

- 10 • Determination whether TRU mixed waste streams comply with the applicable  
11 provisions of the TSDF-WAC
- 12 • Determination whether TRU mixed wastes exhibit a hazardous characteristic  
13 (20.4.1.200 NMAC, incorporating 40 CFR §Part 261, Subpart C)
- 14 • Determination whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating  
15 40 CFR §Part 261, Subpart D)
- 16 • Estimation of waste material parameter weights

17 Table C-1 provides the parameters of interest for the various constituent groupings and testing  
18 methodologies. The following sections provide a description of the acceptable methods to  
19 evaluate these parameters for each waste Summary Category Group.

### 20 C-3 Generator Waste Characterization Methods

21 The characterization techniques used by generator/storage sites includes ~~acceptable~~  
22 ~~knowledge~~AK and may also include, as necessary, radiography and ~~visual examination~~VE. ~~All~~  
23 ~~characterization~~Characterization activities are performed in accordance with the WAP. Table C-  
24 1 provides a summary of the characterization requirements for TRU mixed waste.

#### 25 C-3a Acceptable Knowledge

26 Acceptable knowledge ~~(AK)~~ is used in TRU mixed waste characterization activities in ~~five~~the  
27 following ways:

- 28 • To delineate TRU mixed waste streams
- 29 • To assess whether TRU mixed wastes comply with the TSDF-WAC
- 30 • To assess whether TRU mixed wastes exhibit a hazardous characteristic (20.4.1.200  
31 NMAC, incorporating 40 CFR §Part 261, Subpart C)
- 32 • To assess whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating 40  
33 CFR §Part 261, Subpart D)
- 34 • To estimate waste material parameter weights



1 Acceptable knowledge is discussed in detail in Permit Attachment C4, which outlines the  
2 minimum set of requirements and DQOs which shall be met by the generator/storage sites in  
3 order to use ~~acceptable knowledge~~AK. In addition, Section C-5a(3) of this permit attachment  
4 describes the assessment of ~~acceptable knowledge~~AK through the Audit and Surveillance  
5 Program.

### 6 C-3b Radiography and Visual Examination

7 Radiography and ~~visual examination (VE)~~VE are nondestructive qualitative and quantitative  
8 techniques used to identify and verify waste container contents as specified in Permit  
9 Attachment C1. Generator/storage sites shall perform radiography or VE of 100 percent of CH  
10 TRU mixed waste containers in waste streams except for those waste streams for which ~~the~~  
11 DOE approves a Determination Request. No RH TRU mixed waste will be shipped to ~~the~~ WIPP  
12 ~~facility~~ for storage or disposal without documentation of radiography or VE of 100 percent of the  
13 containers as specified in Permit Attachment C1. Radiography and/or VE will be used, when  
14 necessary, to examine a waste container to verify the physical form of the waste matches its  
15 waste stream description as determined by AK. These techniques can detect observable liquid  
16 in excess of TSDf-WAC limits and containerized gases, which are prohibited ~~from disposal at~~  
17 ~~the WIPP facility~~for WIPP disposal. The prohibition of liquid in excess of TSDf-WAC limits and  
18 containerized gases prevents the shipment of corrosive, ignitable, or reactive wastes.  
19 Radiography and/or VE are also able to verify that the physical form of the waste matches its  
20 waste stream description (i.e. Homogeneous Solids, Soil/Gravel, or Debris Waste [including  
21 unclassified metals]). If the physical form does not match the waste stream description, the  
22 waste will be designated as another waste stream and assigned the preliminary ~~EPA~~ hazardous  
23 waste numbers associated with that new waste stream assignment. That is, if radiography  
24 and/or VE indicates that the waste does not match the waste stream description arrived at by  
25 ~~acceptable knowledge~~AK characterization, a non-conformance report (NCR) will be completed  
26 and the inconsistency will be resolved as specified in Permit Attachment C4, and the NCR will  
27 be dispositioned as specified in Permit Attachment C3, Section C3-7. The proper waste stream  
28 assignment will be determined (including preparation of a new WSPF), the correct hazardous  
29 waste numbers will be assigned, and the resolution will be documented. Refer to Permit  
30 Attachment C4 for a discussion of ~~acceptable knowledge~~AK and its verification process.

31 For generator/storage sites that use VE, the detection of any liquid in non-transparent internal  
32 containers, detected from shaking the internal container, will be handled by assuming that the  
33 internal container is filled with liquid and adding this volume to the total liquid in the container  
34 being characterized using VE. The container being characterized using VE would be rejected  
35 and/or repackaged to exclude the internal container if it is over the TSDf-WAC limits. When  
36 radiography is used, or ~~visual examination~~VE of transparent containers is performed, if any  
37 liquid in internal containers is detected, the volume of liquid shall be added to the total for the  
38 container being characterized using radiography or VE. Radiography, or the equivalent, will be  
39 used as necessary on the existing/stored waste containers to verify the physical characteristics  
40 of the TRU mixed waste correspond with its waste stream identification/waste stream Waste  
41 Matrix Code and to identify prohibited items. Radiographic examination protocols and QA/QC  
42 methods are provided in Permit Attachment C1. Radiography and VE shall be subject to the  
43 Audit and Surveillance Program (Permit Attachment C6).



## 1 C-4 Data Verification and Quality Assurance

2 The Permittees will ensure that applicable waste characterization processes performed by  
3 generator/storage sites sending TRU mixed waste to the WIPP facility for disposal meets WAP  
4 requirements through data validation, usability and reporting controls. Verification occurs at  
5 three levels: 1) the data generation level, 2) the project level, and 3) the Permittee level. The  
6 validation and verification process and requirements at each level are described in Permit  
7 Attachment C3, Section C3-4. The validation and verification process at the Permittee  
8 ~~level~~Level is also described in Section C-5.

### 9 C-4a Data Generation and Project Level Verification Requirements

#### 10 C-4a(1) Data Quality Objectives

11 The waste characterization data obtained through WAP implementation will be used to ensure  
12 that the Permittees meet regulatory requirements with regard to both regulatory compliance and  
13 to ensure that ~~all~~ TRU mixed wastes are properly managed during the Disposal Phase. To  
14 satisfy the RCRA regulatory compliance requirements, the following DQOs are established by  
15 this WAP:

- 16 • Acceptable Knowledge
  - 17 – To delineate TRU mixed waste streams~~.~~
  - 18 – To assess whether TRU mixed wastes comply with the applicable requirements of  
19 the TSDF-WAC~~.~~
  - 20 – To assess whether TRU mixed wastes exhibit a hazardous characteristic  
21 (20.4.1.200 NMAC, incorporating 40 CFR §Part 261, Subpart C)~~.~~
  - 22 – To assess whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating  
23 40 CFR §Part 261, Subpart D)~~.~~
  - 24 – To estimate waste material parameter weights~~.~~
- 25 • Radiography and VE
  - 26 – To verify the TRU mixed waste streams contain no prohibited items and to verify  
27 that physical form of the waste matches the waste stream description as  
28 determined by AK~~.~~

29 Reconciliation of these DQOs by the Generator/Storage Site Project Manager, as applicable, is  
30 addressed in Permit Attachment C3. Reconciliation requires determining whether sufficient type,  
31 quality, and quantity of data have been collected to ensure the DQOs cited above can be  
32 achieved.

#### 33 C-4a(2) Quality Assurance Objectives

34 The generator/storage sites shall demonstrate compliance with each Quality Assurance  
35 Objective (QAO) associated with the characterization methods as presented in Permit

1 Attachment C3. Generator/Storage Site Project Managers are further required to perform a  
2 reconciliation of the data with the DQOs established in this WAP. The Generator/Storage Site  
3 Project Manager shall conclude that ~~all of~~ the DQOs have been met for the characterization of  
4 the waste stream prior to submitting a WSPF to DOE for approval (Permit Attachment C3). The  
5 following QAO elements shall be considered for each technique, as a minimum:

6 • Precision

7 – Precision is a measure of the mutual agreement among multiple measurements.

8 • Accuracy

9 – Accuracy is the degree of agreement between a measurement result and the true  
10 or known value.

11 • Completeness

12 – Completeness is a measure of the amount of valid data obtained from a method  
13 compared to the total amount of data obtained that is expressed as a percentage.

14 • Comparability

15 – Comparability is the degree to which one data set can be compared to another.

16 • Representativeness

17 – Representativeness expresses the degree to which data represent characteristics  
18 of a population.

19 A more detailed discussion of the QAOs can be found in Permit Attachment C3, which  
20 describes the QAOs associated with each test method.

21 C-4a(3) Data Generation

22 ~~BDRs~~Batch data reports (**BDR**), in a format approved by DOE, will be used by each  
23 generator/storage site for reporting waste characterization data. This format will be included in  
24 the generator/storage site Quality Assurance Project Plan (QAPjP), controlled electronic  
25 databases, or procedures referenced in the QAPjP (Permit Attachment C5) and will include ~~all~~  
26 ~~of~~ the elements required by this WAP for ~~BDR~~**BDRs** (Permit Attachment C3).

27 The DOE shall perform audits of the generator/storage site waste characterization programs, as  
28 implemented by the generator/storage site QAPjP, to verify compliance with the WAP and the  
29 DQOs in this WAP (See Permit Attachment C6 for a discussion of the content of the audit  
30 program). The primary functions of these audits are to review generator/storage sites'  
31 adherence to the requirements of this WAP and ensure adherence to the WAP characterization  
32 program. The DOE shall provide the results of each audit to NMED. If audit results indicate that  
33 a generator/storage site is not in compliance with the requirements of this WAP, the DOE will  
34 take appropriate action as specified in Permit Attachment C6.

1 C-4a(4) Data Verification

2 ~~BDRs~~ Batch data reports will document the testing results from the required characterization  
3 activities, and document required QA/QC activities. Data validation and verification at both the  
4 data-generation level and the project level will be performed as required by this Permit before  
5 the required data are transmitted to the Permittees (Permit Attachment C3). The NMED may  
6 request, through the Permittees, copies of any BDR, and/or the raw data validated by the  
7 generator/storage sites, to check the DOE's audit of the validation process.

8 C-4a(5) Data Transmittal

9 ~~BDRs~~ Batch data reports will include the information required by Permit Attachment C3, Section  
10 C3-4 and will be transmitted by hard copy or electronically (provided a hard copy is available on  
11 demand) from the data generation level to the project level.

12 The generator/storage site ~~will transmit~~s waste container information electronically via the WIPP  
13 Waste Information System (**WWIS**). Data will be entered into the WWIS in the exact format  
14 required by the database. Refer to Section C-5a(1) for WWIS reporting requirements and the  
15 *Waste Data System User's Manual* (DOE, ~~2009~~2019) for the WWIS data fields and format  
16 requirements.

17 Once a waste stream is characterized, the Site Project Manager will also submit to the  
18 Permittees a WSPF (Figure C-1) accompanied by the CIS for that waste stream which includes  
19 reconciliation with DQOs (Permit Attachment C3, Sections C3-6b(1) and C3-6b(2)). The WSPF,  
20 the CIS, and information from the WWIS will be used as the basis for acceptance of waste  
21 characterization information on TRU mixed wastes to be disposed of at the WIPP facility.

22 C-4a(6) Records Management

23 Records related to waste characterization activities performed by the generator/storage sites will  
24 be maintained in the testing facility files or generator/storage site project files, or at the WIPP  
25 Records Archive facility. Raw data obtained by testing TRU mixed waste in support of this WAP  
26 will be identifiable, legible, and provide documentary evidence of quality. ~~TRU~~Transuranic mixed  
27 waste characterization records submitted to the Permittees shall be maintained in the WIPP  
28 facility ~~operating record~~Operating Record and be available for inspection by the NMED.

29 Records inventory and disposition schedule (**RIDS**) or an equivalent system shall be prepared  
30 and approved by generator/storage site personnel. ~~All records~~Records relevant to an  
31 enforcement action under this Permit, regardless of disposition, shall be maintained at the  
32 generator/storage site until the NMED determines they are no longer needed for enforcement  
33 action, and then dispositioned as specified in the approved RIDS. ~~All waste~~Waste  
34 characterization data and related QA/QC records for TRU mixed waste to be shipped to the  
35 WIPP facility are designated as either Lifetime Records or Non-Permanent Records.

36 Records that are designated as Lifetime Records shall be maintained for the life of the waste  
37 characterization program at a participating generator/storage site plus six years or transferred  
38 for permanent archival storage to the WIPP Records Archive facility.

39 Waste characterization records include historical characterization records (i.e. h headspace gas  
40 sampling/analysis and homogeneous solids and soil/gravel sampling/analysis) generated

1 through implementation of previous requirements in this WAP. Those waste characterization  
2 records designated as Non-Permanent Records shall be maintained for ten years from the date  
3 of (record) generation at the participating generator/storage site or at the WIPP Records Archive  
4 facility and then dispositioned according to their approved RIDS. If a generator/storage site  
5 ceases to operate, ~~all~~ records shall be transferred before closeout to the Permittees for  
6 management at the WIPP Records Archive facility. Table C-2 is a listing of records designated  
7 as Lifetime Records and Non-Permanent Records. Classified information will not be transferred  
8 to the WIPP facility. Notations will be provided to the Permittees indicating the absence of  
9 classified information. The approved generator/storage site RIDS ~~will~~ identify appropriate  
10 disposition of classified information. Nothing in this Permit is intended to, nor should it be  
11 interpreted to, require the disclosure of any U.S. Department of Energy classified information to  
12 persons without appropriate clearance to view such information.

### 13 C-5 Permittee Level Waste Screening and Verification of TRU Mixed Waste

14 Permittee waste screening is a two-phased process. Phase I will occur prior to configuring  
15 shipments of TRU mixed waste. Phase II will occur after configuration of shipments of TRU  
16 mixed waste but before it is disposed at the WIPP facility. Figure C-3 presents Phase I and a  
17 portion of Phase II of the TRU mixed waste screening process. Permit Attachment C7 presents  
18 the TRU mixed waste confirmation portion of Phase II activities.

#### 19 C-5a Phase I Waste Stream Screening and Verification

20 The first phase of the waste screening and verification process will occur before TRU mixed  
21 waste is shipped to the WIPP facility. Before the Permittees begin the process of accepting TRU  
22 mixed waste from a generator/storage site, an initial audit of that generator/storage site will be  
23 conducted as part of the Audit and Surveillance Program (Permit Attachment C6). The RCRA  
24 portion of the generator/storage site audit program will provide on-site verification of  
25 characterization procedures; BDR preparation; and recordkeeping to ensure that ~~all~~ applicable  
26 provisions of the WAP requirements are met. Another portion of the Phase I verification is the  
27 WSPF approval process. At the WIPP facility, this process includes verification that ~~all of~~ the  
28 required elements of the WSPF and the CIS are present (Permit Attachment C3, Section C3-  
29 6b(1)) and that the waste characterization information meets acceptance criteria required for  
30 compliance with the WAP (Section C3-6b(1)).

31 A generator/storage site must first prepare a QAPjP, which includes applicable WAP  
32 requirements, and submit it to DOE for review and approval (Permit Attachment C5). Once  
33 approved, a copy of the QAPjP is provided to NMED for examination. The generator/storage  
34 site will implement the specific parameters of the QAPjP after it is approved. An initial audit will  
35 be performed after QAPjP implementation and prior to the generator/storage site being certified  
36 for shipment of waste to the WIPP facility. ~~Additional-Subsequent~~ audits, focusing on the results  
37 of waste characterization, will be performed at least annually. The DOE has the right to conduct  
38 unannounced audits and to examine any records that are related to the scope of the audit. See  
39 Section C-5a(3) and Permit Attachment C6 for further information regarding audits.

40 When the required waste stream characterization data have been collected by a  
41 generator/storage site and the initial generator/storage site audit has been successfully  
42 completed, the generator/storage Site Project Manager will verify that waste stream  
43 characterization meets the applicable WAP requirements as a part of the project level  
44 verification (Permit Attachment C3, Section C3-4b). If the waste characterization does not meet

1 the applicable requirements of the WAP, the mixed waste stream cannot be managed, stored,  
2 or disposed at the WIPP facility until those requirements are met. The Site Project Manager will  
3 then complete a WSPF and submit it to the Permittees, along with the accompanying CIS for  
4 that waste stream (Permit Attachment C3, Section C3-6b(1)). ~~All data~~Data necessary to check  
5 the accuracy of the WSPF will be transmitted to the Permittees for verification. This provides  
6 notification that the generator/storage site considers that the waste stream (identified by the  
7 waste stream identification number) has been adequately characterized for disposal prior to  
8 shipment to the WIPP facility. The Permittees will compare radiographic and visual examination  
9 data obtained subsequent to submittal and approval of the WSPF (and prior to submittal) with  
10 characterization information presented on this form. If the Permittees determine (through the  
11 data comparison) that the characterization information is adequate, the DOE will approve the  
12 WSPF. Prior to the first shipment of containers from the approved waste stream, the approved  
13 WSPF and accompanying CIS will be provided to the NMED. If the data comparison indicates  
14 that analyzed containers have hazardous wastes not present on the WSPF, or a different Waste  
15 Matrix Code applies, the WSPF is in error and shall be resubmitted. Ongoing WSPF  
16 examination is discussed in detail in Section C-5a(2).

17 Audits of generator/storage sites will be conducted as part of the Audit and Surveillance  
18 Program (Permit Attachment C6). The RCRA portion of the generator/storage site audit program  
19 will provide on-site verification of waste characterization procedures; BDR preparation; and  
20 record keeping to ensure that ~~all~~ applicable provisions of the WAP requirements are met. As  
21 part of the waste characterization data submittal, the generator/storage site will also transmit the  
22 data on a container basis via the WWIS. This data submittal can occur at any time as the data  
23 are being collected; but will be complete for each container prior to shipment of that container.  
24 The WWIS will conduct internal edit/limit checks as the data are entered, and the data will be  
25 available to the Permittees as supporting information for WSPF review. The NMED will have  
26 read-only access to the WWIS as necessary to determine compliance with the WAP. The initial  
27 WSPF check performed by the Permittees will include WWIS data submitted by the  
28 generator/storage site for each waste container submitted for the WSPF review and the CIS.  
29 The Permittees will compare ongoing characterization data obtained and submitted via the  
30 WWIS to the approved WSPF. If this comparison shows that containers have hazardous wastes  
31 not reported on the WSPF, or a different Waste Matrix Code applies, the data are rejected and  
32 the waste containers are not accepted for shipment until a new or revised WSPF is submitted to  
33 the Permittees and approved by the DOE.

34 If discrepancies regarding hazardous waste number assignment or Waste Matrix Code  
35 designation arise as a result of the Phase I review, the generator/storage sites will be contacted  
36 by the Permittees and required to provide the necessary additional information to resolve the  
37 discrepancy before that waste stream is approved for disposal at the WIPP facility. If the  
38 discrepancy is not resolved, the waste stream will not be approved. The DOE will notify the  
39 NMED in writing of any discrepancies identified during WSPF review and the resulting  
40 discrepancy resolution prior to waste shipment. The Permittees will not manage, store, or  
41 dispose the waste stream until this discrepancy is resolved in accordance with this WAP.

#### 42 C-5a(1) WWIS Description

43 All generator/storage sites planning to ship TRU mixed waste to the WIPP facility will supply the  
44 required data to the WWIS. The WWIS Data Dictionary includes ~~all of~~ the data fields, the field  
45 format and the limits associated with the data as established by this WAP. These data will be

1 subjected to edit and limit checks that are performed automatically by the database, as defined  
2 in the *Waste Data System User's Manual* (DOE, 20192009).

3 The Permittees will coordinate the data transmission with each generator/storage site. Actual  
4 data transmission will use appropriate technology to ensure the integrity of the data  
5 transmissions. The Permittees will require sites with large waste inventories and large  
6 databases to populate a data structure provided by the Permittees that contains the required  
7 data dictionary fields that are appropriate for the waste stream (or waste streams) at that site.  
8 The Permittees will access these data via the Internet to ensure an efficient transfer of this data.  
9 Small quantity sites will be given a similar data structure by the Permittees that is tailored to  
10 their types of waste. Sites with very small quantities of waste will be provided with the ability to  
11 assemble the data interactively to this data structure on the WWIS.

12 The Permittees will use the WWIS to verify that ~~all of~~ the supplied data meet the edit and limit  
13 checks prior to the shipment of any TRU mixed waste to the WIPP facility. The WWIS  
14 automatically will notify the generator/storage site if any of the supplied data fails to meet the  
15 requirements of the edit and limit checks via an appropriate error message. The  
16 generator/storage site will be required to correct the discrepancy with the waste or the waste  
17 data and re-transmit the corrected data prior to acceptance of the data by the WWIS. The  
18 Permittees will review data reported for each container of each shipment prior to providing  
19 notification to the shipping generator/storage site that the shipment is acceptable. ~~Read-only~~  
20 ~~access to the WWIS will be provided to NMED.~~ Table C-3 contains a listing of the data fields  
21 contained in the WWIS that are required as part of this Permit.

22 The WWIS will generate the following:

- 23 • Waste Emplacement Report

24 This report will be added to the ~~operating record~~Operating Record to track the  
25 quantities of waste, date of emplacement, and location of authorized containers or  
26 container assemblies in the repository. The Permittees will document the specific  
27 panel room or drift that an individual waste container is placed in as well as the  
28 row/column/height coordinates location of the container or containers assembly. This  
29 report will be generated on a weekly basis. Locations of containers or container  
30 assemblies will also be placed on a map separate from the WWIS. Reports and maps  
31 that are included as part of the ~~operating record~~Operating Record will be retained ~~at~~  
32 the WIPP site by the Permittees, for the life of the facility.

- 33 • Shipment Summary Report

34 This report will contain the container identification numbers (**IDs**) of every container in  
35 the shipment, listed by Shipping Package number and by assembly number (for  
36 seven-packs, four-packs, and three-packs), for every assembly in the Shipping  
37 Package. This report is used by the Permittees to verify containers in a shipment and  
38 will be generated on a shipment basis.

- 39 • Waste Container Data Report

40 This report will be generated on a waste stream basis and will be used by the  
41 Permittees during the WSPF review and DOE approval process. This report will



1 contain the data listed in the Characterization Module on Table C-3. This report will be  
2 generated and attached to the WSPF for inclusion in the facility ~~operating~~  
3 ~~record~~ Operating Record and will be kept for the life of the facility.

4 • Reports of Change Log

5 This will consist of a short report that lists the user ID and the fields changed. The  
6 report will also include a reason for the change. A longer report will list the information  
7 provided on the short report and include a before and after image of the record for  
8 each change, a before-record for each deletion, and the new information for added  
9 records. These reports will provide an auditable trail for the data in the database.

10 Access to the WWIS will be controlled by the Permittees' Data Administrator (**DA**) who will  
11 control the WWIS users based on approval from management personnel. Training for the WWIS  
12 Data Administrator job position will be in accordance with the WWIS Retrieval Characterization  
13 Transportation Data Administrator Task Card on file at the WIPP facility.

14 The TRU mixed waste generator/storage sites will only have access to data that they have  
15 supplied, and only until the data have been formally accepted by the Permittees. After the data  
16 have been accepted, the data will be protected from indiscriminate change and can only be  
17 changed by an authorized DA.

18 The WWIS has a Change Log that requires a reason for the change from the DA prior to  
19 accepting the change. The data change information, the user ID of the authorized DA making  
20 the change, and the date of the change will be recorded in the data change log automatically.  
21 The data change log cannot be revised by any user, including the DA. The data change log will  
22 be subject to internal and external audits and will provide an auditable trail for ~~all~~ changes made  
23 to previously approved data.

24 C-5a(2) Examination of the Waste Stream Profile Form and Container Data Checks

25 The Permittees ~~will~~ verify the completeness and accuracy of the Waste Stream Profile Form  
26 (Section C3-6b(1)). Figure C-2 includes the waste characterization and waste stream approval  
27 process. The assignment of the waste stream description, Waste Matrix Code Group, and  
28 Summary Category Groups; the acceptable knowledge summary documentation; the methods  
29 used for characterization; the DOE certification, and ~~the~~ appropriate designation of EPA  
30 hazardous waste number(s) will be examined by the Permittees. If the WSPF is inaccurate,  
31 efforts will be made to resolve discrepancies by contacting the generator/storage site in order  
32 for the waste stream to be eligible for shipment to the WIPP facility. If discrepancies in the waste  
33 stream are detected at the generator/storage site, the generator/storage site will implement a  
34 non-conformance program to identify, document, and report discrepancies (Permit Attachment  
35 C3).

36 The WSPF shall pass ~~all~~ verification checks by the Permittees in order for the waste stream to  
37 be approved by DOE for shipment to the WIPP facility. The WSPF check against waste  
38 container data will occur during the initial WSPF approval process (Section C-5a).

39 The EPA hazardous waste numbers for the wastes that appear on the Waste Stream Profile  
40 Form will be compared to those in Table C-5 to ensure that only approved wastes are accepted  
41 for management, storage, or disposal at ~~the~~ WIPP facility. Some of the waste may also be



1 identified by unique state hazardous waste codes or numbers. These wastes are acceptable at  
2 WIPP as long as the TSDf-WAC are met. The CIS will be reviewed by the Permittees to verify  
3 that the waste has been classified correctly with respect to the assigned EPA hazardous waste  
4 numbers. The Permittees will verify that the applicable requirements of the TSDf-WAC have  
5 been met by the generator/storage site.

6 Waste data transferred via the WWIS after WSPF approval will be compared with the approved  
7 WSPF. Any container from an approved hazardous waste stream with a description different  
8 from its WSPF will not be managed, stored, or disposed at the WIPP facility.

9 The Permittees will also verify that three different types of data specified below are available for  
10 every container holding TRU mixed waste before that waste is managed, stored, or disposed at  
11 WIPP: 1) an assignment of the waste stream's waste description (by Waste Matrix Codes) and  
12 Waste Matrix Code Group; 2) a determination of ignitability, reactivity, and corrosivity; and 3) a  
13 determination of compatibility. The verification of waste stream description will be performed by  
14 reviewing the WWIS for consistency in the waste stream description and WSPF. The CIS will  
15 indicate if the waste has been checked for the characteristics of ignitability, corrosivity, and  
16 reactivity. The final verification of waste compatibility will be performed using Appendix C1 of the  
17 WIPP RCRA Part B Permit Application (DOE, 1997), the compatibility study. Chemical  
18 compatibility will be evaluated pursuant to Permit Part 2, Section 2.3.3.4 (as applicable), on a  
19 waste stream basis based on guidance provided in the 1980 EPA method, EPA 600/2-80-076.  
20 The evaluation will be documented (e.g., in a chemical compatibility evaluation memorandum).

21 Any container with unresolved discrepancies associated with hazardous waste characterization  
22 will not be managed, stored, or disposed at the WIPP facility until the discrepancies are  
23 resolved. If the discrepancies cannot be resolved, DOE will revoke the approval status of the  
24 waste stream, suspend shipments of the waste stream, and notify the NMED. Waste stream  
25 approval will not be reinstated until the generator/storage site demonstrates all that corrective  
26 actions have been implemented and the generator/storage site waste characterization program  
27 is reassessed by the Permittees-DOE.

### 28 C-5a(3) Audit and Surveillance Program

29 An important part of the Permittees' verification process is the Audit and Surveillance Program.  
30 The focus of this audit program is compliance with this WAP and the Permit. This audit program  
31 addresses ~~all~~AK implementation and testing activities, from waste stream classification  
32 assignment through waste container certification, and ensures compliance with SOPs and the  
33 WAP. Audits will ensure that containers and their associated documentation are adequately  
34 tracked throughout the waste handling process. Operator qualifications will be verified, and  
35 implementation of QA/QC procedures will be surveyed. A final report that includes  
36 generator/storage site audit results and applicable WAP-related corrective action report (**CAR**)  
37 resolution will be provided to NMED for approval, and will be kept in the WIPP facility ~~operating~~  
38 ~~record~~Operating Record until closure of the WIPP facility.

39 The DOE will perform an initial audit at each generator/storage site performing waste  
40 characterization activities prior to the formal acceptance of the WSPFs and/or any waste  
41 characterization data supplied by the generator/storage sites. Audits will be performed at least  
42 annually thereafter, including the possibility of unannounced audits (i.e., not a regularly  
43 scheduled audit). These audits will allow NMED to verify that the Permittees have implemented  
44 the WAP and that generator/storage sites have implemented a QA program for the

1 characterization of waste and meet applicable WAP requirements. The accuracy of physical  
2 waste description and waste stream assignment provided by the generator/storage site will be  
3 verified by review of the radiography results, and visual examination of data records and  
4 radiography images (as necessary) during audits conducted by DOE. More detail on this audit  
5 process is provided in Permit Attachment C6.

#### 6 C-5b Phase II Waste Shipment Screening and Verification

7 As presented in Figure C-3, Phase II of the waste shipment screening and verification process  
8 begins with confirmation of the waste pursuant to Permit Attachment C7 after waste shipments  
9 are configured. After the waste shipment has arrived, the Permittees will screen the shipments  
10 to determine the completeness and accuracy of the EPA Hazardous Waste Manifest and the  
11 land disposal restriction notice completeness. The Permittees will verify there are no waste  
12 shipment irregularities and the waste containers are in good condition. Only those waste  
13 containers that are from shipments that have been confirmed pursuant to Permit Attachment C7  
14 and that pass all-Phase II waste screening and verification determinations will be emplaced at  
15 WIPP. For each container shipped, the Permittees shall ensure that the generator/storage sites  
16 provide the following information:

##### 17 Hazardous Waste Manifest Information:

- 18 • Generator/storage site name and EPA ID
- 19 • Generator/storage site contact name and phone number
- 20 • Quantity of waste
- 21 • List of up to six state and/or federal hazardous waste numbers in each line item
- 22 • Listing of all-shipping container IDs (Shipping Package serial number)
- 23 • Signature of authorized generator representative

##### 24 Specific Waste Container information:

- 25 • Waste Stream Identification Number
- 26 • List of Hazardous Waste Numbers per Container
- 27 • Certification Data
- 28 • Shipping Data (Assembly numbers, ship date, shipping category, etc.)

29 This information shall also be supplied electronically to the WWIS. The container-specific  
30 information will be supplied electronically as described in Section C-5a(1), and shall be supplied  
31 prior to the Permittees' management, storage, or disposal of the waste.

32 The Permittees will verify each approved shipment upon receipt at the WIPP facility against the  
33 data on the WWIS shipment summary report to ensure containers have the required  
34 information. A Waste Receipt Checklist will be used to document the verification.

#### 35 C-5b(1) Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste 36 Tracking Information

37 Upon receipt of a TRU mixed waste shipment, the Permittees will make a determination of EPA  
38 Uniform Hazardous Waste Manifest completeness and sign the manifest to allow the driver to

1 depart. For CH TRU mixed waste, the Permittees will then make a determination of waste  
2 shipment completeness by checking the unique, bar-coded identification number found on ~~each~~  
3 ~~container~~waste containers holding TRU mixed waste against the WWIS database after opening  
4 the Shipping Package.

5 The WWIS links the bar-coded identification numbers of ~~all~~ containers in a specific waste  
6 shipment to the waste assembly (for ~~7~~seven-packs, ~~4~~four-packs, ~~3~~three-packs and ~~5~~five-drum  
7 carriages) and to the shipment identification number, which is also written on the EPA  
8 Hazardous Waste Manifest.

9 For shipments in the RH-TRU 72B cask, the identification number of the single payload  
10 container is read during cask-to-cask transfer in the Transfer Cell and then checked against the  
11 WWIS database. For shipments in the CNS 10-160B cask, the Permittees will make a  
12 determination of waste shipment completeness by checking the unique identification number  
13 found on each container holding TRU mixed waste in the Hot Cell against the WWIS database  
14 after unloading the cask.

15 Generators electronically transmit the waste shipment information to the WWIS before the TRU  
16 mixed waste shipment is transported. Once a TRU mixed waste shipment arrives, the  
17 Permittees verify the identity of each cask or container (or one container in a bound ~~7~~seven-  
18 pack, ~~4~~four-pack, or ~~3~~three-pack) using the data already in the WWIS.

19 The WWIS will maintain waste container receipt and emplacement information provided by the  
20 Permittees. It will include, among other items, the following information associated with each  
21 container of TRU mixed waste:

- 22 • Package Inner Containment Vessel (~~ICV~~) or shipping cask closure date
- 23 • Package (container or canister) receipt date
- 24 • Overpack identification number (if appropriate)
- 25 • ~~Container or canister~~ Package (~~container or canister~~) emplacement date
- 26 • ~~Container or canister~~ Package (~~container or canister~~) emplacement location

27 Manifest discrepancies will be identified during manifest examination and container bar-code  
28 WWIS data comparison. A manifest discrepancy is a difference between the quantity or type of  
29 hazardous waste designated on the manifest and the quantity or type of hazardous waste the  
30 ~~WIPP facility~~Permittees actually receives. The generator/storage site technical contact (as listed  
31 on the manifest) will be contacted to resolve the discrepancy. If the discrepancy is identified  
32 prior to the containers being removed from the package or shipping cask, the waste will be  
33 retained in the parking area. If the discrepancy is identified after the waste containers are  
34 removed from the package or cask, the waste will be retained in the Waste Handling Building  
35 (WHB) until the discrepancy is resolved. Errors on the manifest can be corrected by the  
36 ~~Permittees at the~~ WIPP facility with a verbal (followed by a mandatory written) concurrence by  
37 the generator/storage site technical contact. ~~All~~dDiscrepancies that are unresolved within  
38 fifteen (15) days of receiving the waste will be immediately reported to ~~the~~ NMED in writing.  
39 Notifications to ~~the~~ NMED will consist of a letter describing the discrepancies, discrepancy  
40 resolution, and a copy of the manifest. If the manifest discrepancies have not been resolved

1 within thirty (30) days of waste receipt, the shipment will be returned to the generator/storage  
2 facility. If it becomes necessary to return waste containers to the generator/storage site, a new  
3 EPA Uniform Hazardous Waste Manifest may be prepared by the Permittees.

4 Documentation of the returned containers will be recorded in the WWIS. Changes will be made  
5 to the WWIS data to indicate the current status of the container(s). The reason for the WWIS  
6 data change and the record of the WWIS data change will be maintained in the change log of  
7 the WWIS, which will provide an auditable record of the returned shipment.

8 The Permittees will be responsible for the resolution of discrepancies, notification of the NMED,  
9 as well as returning the original copy of the manifest to the generator/storage site.

#### 10 C-5b(2) Examination of the Land Disposal Restriction (LDR) Notice

11 ~~TRU~~Transuranic mixed waste designated by the Secretary of Energy for disposal at the WIPP  
12 facility is exempt from the LDRs by the WIPP Land Withdrawal Act Amendment (Public Law  
13 104-201). This amendment states that WIPP "Waste is exempted from treatment standards  
14 promulgated pursuant to section 3004(m) of the Solid Waste Disposal Act (42 U.S. C. 6924(m))  
15 and shall not be subjected to the Land Disposal prohibitions in section 3004(d), (e), (f), and (g)  
16 of the Solid Waste Disposal Act." Therefore, with the initial shipment of a TRU mixed waste  
17 stream, the generator shall provide the Permittees with a one time written notice. The notice  
18 must include the information listed below:

19 Land Disposal Restriction Notice Information:

- 20 • EPA Hazardous Waste Number(s) and Manifest Numbers of first shipment of a mixed  
21 waste stream
- 22 • Statement: this waste is not prohibited from land disposal
- 23 • Date the waste is subject to prohibition

24 This information is the applicable information taken from column "268.7(a)(4)" of the "Generator  
25 Paperwork Requirements Table" in 20.4.1.800 NMAC (incorporating 40 CFR §268.7(a)(4)).  
26 Note that item "5" from the "Generator Paperwork Requirements Table" is not applicable since  
27 waste analysis data are provided electronically via the WWIS and item "7" is not applicable  
28 since waste designated by the Secretary of Energy for disposal at the WIPP facility is exempted  
29 from the treatment standards.

30 The Permittees will review the LDR notice for accuracy and completeness. The generator will  
31 prepare this notice in accordance with the applicable requirements of 20.4.1.800 NMAC  
32 (incorporating 40 CFR §268.7(a)(4)).

#### 33 C-5b(3) Verification

34 The Permittees will make a determination of TRU mixed waste shipment irregularities. The  
35 following items will be inspected for each TRU mixed waste shipment arriving at the WIPP  
36 facility:

- 1 • Whether the number and type of containers holding TRU mixed waste match the  
2 information in the WWIS
- 3 • Whether the containers are in good condition

4 The Permittees will verify that the containers (as identified by their container ID numbers) are  
5 the containers for which accepted data already exists in the WWIS. A check will be performed  
6 by the Permittees comparing the data on the WWIS Shipment Summary Report for the  
7 shipment to the actual shipping papers (including the EPA Hazardous Waste Manifest). This  
8 check also verifies that the containers included in the shipment are those for which approved  
9 shipping data already exist in the WWIS Transportation Data Module (Table C-3). For standard  
10 waste boxes (**SWBs**) and ~~ten drum overpacks (TDOPs)~~, this check will include comparing the  
11 barcode on the container with the container number on the shipping papers and the data on the  
12 WWIS Shipment Summary Report. For ~~7~~seven-pack assemblies, one of the seven container  
13 barcodes will be read by the barcode reader and compared to the assembly information for this  
14 container on the WWIS Shipment Summary Report. This will automatically identify the  
15 remaining six containers in the assembly. This process enables the Permittees to identify ~~all of~~  
16 the containers in the assembly with minimum radiological exposure. If ~~all of~~ the container IDs  
17 and the information on the shipping papers agree with the WWIS Shipment Summary Report,  
18 and the shipment was subject to waste confirmation by the Permittees prior to shipment to the  
19 WIPP facility pursuant to Permit Attachment C7, the containers will be approved for storage  
20 and disposal at the WIPP facility.

#### 21 C-6 Permittees' Waste Shipment Screening QA/QC

22 Waste shipment screening QA/QC ensures that TRU mixed waste received is that which has  
23 been approved for shipment during the Phase I and Phase II screening. This is accomplished by  
24 maintaining QA/QC control of the waste shipment screening process. The screening process  
25 will be controlled by administrative processes which will generate records documenting waste  
26 receipt that will become part of the waste receipt record. The waste receipt record documents  
27 that container identifications correspond to shipping information and approved TRU mixed  
28 waste streams. The Permittees will extend QA/QC practices to the management of ~~all~~ records  
29 associated with waste shipment screening determinations.

#### 30 C-7 Records Management and Reporting

31 As part of the ~~WIPP facility's operating record~~Operating Record, data and documents  
32 associated with waste characterization and waste confirmation are managed in accordance with  
33 standard records management practices.

34 ~~All waste~~Waste characterization data for each TRU mixed waste container transmitted to the  
35 WIPP facility shall be maintained by the Permittees for the active life of the WIPP facility plus  
36 two years. The active life of the WIPP facility is defined as the period from the initial receipt of  
37 TRU mixed waste at the facility until NMED receives certification of final closure of the facility.  
38 After their active life, the records shall be retired to the WIPP Records Archive facility and  
39 maintained for 30 years. These records will then be offered to the National Archives. However,  
40 this disposition requirement does not preclude the inclusion of these records in the permanent  
41 marker system or other requirements for institutional control.

1 The storage of the Permittees' copy of the manifest, LDR information, waste characterization  
2 data, WSPFs, waste confirmation activity records, and other related records will be identified on  
3 the appropriate ~~records inventory and disposition schedule~~RIDS.

4 The following records will be maintained for waste characterization and waste confirmation  
5 purposes as part of the ~~WIPP facility operating record~~Operating Record:

- 6 • Completed WIPP WSPFs and accompanying CIS, including individual container data  
7 as transferred on the WWIS (or received as hard-copy) and any discrepancy-related  
8 documentation as specified in Section C-5a
- 9 • Radiography and visual examination records (data sheets, packaging logs, and video  
10 and audio recordings) of waste confirmation activities
- 11 • Completed Waste Receipt Checklists and discrepancy-related documentation as  
12 specified in Section C-5b
- 13 • WIPP WWIS Waste Emplacement Report as specified in Section C-5a(1)
- 14 • Audit reports and corrective action reports from the Audit and Surveillance Program  
15 audits as specified in Section C-5a(3) and Permit Attachment C6
- 16 • ~~CARs~~Corrective action reports and closure information for corrective actions taken  
17 due to nonconforming waste being identified during waste confirmation by the  
18 Permittees

19 These records will be maintained for ~~all~~ TRU mixed waste managed at the WIPP facility.

20 Waste characterization and waste confirmation data and documents related to waste  
21 characterization that are part of the ~~WIPP facility operating record~~Operating Record are  
22 managed in accordance with the following guidelines:

### 23 C-7a General Requirements

- 24 • Records shall be legible
- 25 • Corrections shall be made with a single line through the incorrect information, and the  
26 date and initial of the person making the correction shall be added
- 27 • Black ink is encouraged, unless a copy test has been conducted to ensure the other  
28 color ink will copy
- 29 • Use of highlighters on records is discouraged
- 30 • Records shall be reviewed for completeness
- 31 • Records shall be validated by the cognizant manager or designee

### 32 C-7b Records Storage

- 33 • Active records shall be stored when not in use
- 34 • Quality records shall be kept in a one-hour (certified) fire-rated container or a copy of a  
35 record shall be stored separately (sufficiently remote from the original) in order to



- 1            prevent destruction of both copies as a result of a single event such as fire or natural  
2            disaster
- 3            • Unauthorized access to the records is controlled by locking the storage container or  
4            controlling personnel access to the storage area

5    C-8 Reporting

6    The Permittees will provide a biennial report in accordance with 20.4.1.500 NMAC  
7    (incorporating 40 CFR §264.75) on EPA Form 8700-13 A/B to the NMED that includes  
8    information on TRU mixed waste volume and waste descriptions received for disposal during  
9    the ~~time period covered by the report~~ previous year.

10



1 C-9 List of References

2 U.S. Department of Energy (DOE), ~~2019~~2009, "Waste Data System User's Manual,"  
3 DOE/WIPP 09-3427, U.S. Department of Energy.

4 U.S. Department of Energy (DOE), 1997, Resource Conservation and Recovery Act Part B  
5 Permit Application for the Waste Isolation Pilot Plant", Revision 6.5, U.S. Department of Energy.

6 ~~U.S. Environmental Protection Agency (EPA), April 1994, "Waste Analysis at Facilities that~~  
7 ~~Generate, Treat, Store, and Dispose of Hazardous Waste, a Guidance Manual," OSWER~~  
8 ~~9938.4-03, Office of Solid Waste and Emergency Response, Washington, D.C.~~U.S.  
9 ~~Environmental Protection Agency (EPA), April 2015, EPA 530-R-12-001, "Waste Analysis at~~  
10 ~~Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes - Final, A Guidance~~  
11 ~~Manual," Office of Solid Waste and Emergency Response, Washington, D.C.~~

12 U.S. Environmental Protection Agency (EPA), April 1980, "A Method for Determining the  
13 Compatibility of Hazardous Wastes," EPA-600/2-80-076, California Department of Health  
14 Services and the U.S. Environmental Protection Agency, Office of Research and Development.

15

## TABLES

**Table C-1**  
**Summary of Parameters, Characterization Methods, and Rationale for Transuranic Mixed Waste**

<b>Waste Matrix Code Summary Categories</b>	<b>Waste Matrix Code Groups</b>	<b>Characterization Parameter</b>	<b>Method</b>	<b>Rationale</b>
S3000-Homogeneous Solids	<ul style="list-style-type: none"> <li>• Solidified inorganics</li> <li>• Salt waste</li> <li>• Solidified organics</li> </ul>	Physical waste form	Acceptable knowledge, radiography and/or visual examination	<ul style="list-style-type: none"> <li>• Determine waste matrix</li> <li>• Demonstrate compliance with waste acceptance criteria (e.g., no liquid in excess of TSDF-WAC limits, no incompatible wastes, no compressed gases)</li> <li>• Determine assignment of EPA hazardous waste numbers</li> </ul>
S4000-Soil/Gravel	<ul style="list-style-type: none"> <li>• Contaminated soil/debris</li> </ul>			
S5000-Debris Waste	<ul style="list-style-type: none"> <li>• Uncategorized metal (metal waste other than lead/cadmium)</li> <li>• Lead/cadmium waste</li> <li>• Inorganic nonmetal waste</li> <li>• Combustible waste</li> <li>• Graphite waste</li> <li>• Heterogeneous debris waste</li> <li>• Composite filter waste</li> </ul>	Hazardous constituents <ul style="list-style-type: none"> <li>• Listed</li> <li>• Characteristic</li> </ul>	Acceptable knowledge	

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**Table C-2**  
**Required Program Records Maintained in Generator/Storage Site Project Files**

<p><u>Lifetime Records</u></p> <ul style="list-style-type: none"><li>• Field sampling data forms</li><li>• Field and laboratory chain-of-custody forms</li><li>• Test facility and laboratory batch data reports</li><li>• Waste Stream Characterization Package</li><li>• Sampling Plans</li><li>• Data reduction, validation, and reporting documentation</li><li>• Acceptable knowledge documentation</li><li>• Waste Stream Profile Form and Characterization Information Summary</li></ul>
<p><u>Non-Permanent Records</u></p> <ul style="list-style-type: none"><li>• Nonconformance documentation</li><li>• Variance documentation</li><li>• Assessment documentation</li><li>• Gas canister tags</li><li>• Methods performance documentation</li><li>• Performance Demonstration Program documentation</li><li>• Sampling equipment certifications</li><li>• Calculations and related software documentation</li><li>• Training/qualification documentation</li><li>• QAPJPs (generator/storage sites) documentation (<del>including</del> revisions)</li><li>• Calibration documentation</li><li>• Analytical raw data</li><li>• Procurement documentation</li><li>• QA procedures (<del>including</del> revisions)</li><li>• Technical implementing procedures (<del>including</del> revisions)</li><li>• Audio/video recording (radiography, visual, etc.)</li></ul>

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**Table C-3  
 WIPP Waste Information System Data Fields<sup>a</sup>**

Characterization Module Data Fields <sup>b</sup>	
Container ID <sup>c</sup> Generator EPA ID Generator Address Generator Name Generator Contact <del>EPA Hazardous Waste Number</del> Hazardous Code Layers of Packaging Liner Exists Liner Hole Size Filter Model Number of Filters Installed Item Description Code <del>Haz-Hazardous Waste</del> Manifest Number NDE Complete <sup>e</sup>	Transporter EPA ID Transporter Name Visual Exam Container <sup>e</sup> Waste Material Parameter <sup>d</sup> Waste Material Weight <sup>d</sup> Waste Matrix Code Waste Matrix Code Group Waste Stream Profile Number
Certification Module Data Fields	
Container ID <sup>c</sup> Container type Container Weight Contact Dose Rate Container Certification date Container Closure Date	Handling Code
Transportation Data Module	
Contact-Handled Package Number Assembly Number <sup>f</sup> Container IDs <sup>c,d</sup> ICV Closure Date	Ship Date Receive Date
Disposal Module Data	
Container ID <sup>c</sup> Disposal Date Disposal Location	

- <sup>a</sup> This is not a complete list of the WWIS data fields.
- <sup>b</sup> Some of the fields required for characterization are also required for certification and/or transportation.
- <sup>c</sup> Container ID is the main relational field in the WWIS Database.
- <sup>d</sup> This is a ~~multiple-occurring~~ recurring field for each waste material parameter, nuclide, etc.
- <sup>e</sup> These are logical fields requiring only a yes/no.
- <sup>f</sup> Required for ~~7~~seven-packs of 55-gal drums, ~~4~~four-packs of 85-gal drums, or ~~3~~three-packs of 100-gal drums to tie ~~all of~~ the drums in that assembly together. This facilitates the identification of waste containers in a shipment without need to break\_up the assembly.

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**Table C-4  
 Waste Tanks Subject to Exclusion**

Hanford Site - 177 Tanks	
A-101 through A-106	C-201 through C-204
AN-101 through AN-107	S-101 through S-112
AP-101 through AP-108	SX-101 through SX-115
AW-101 through AW-106	SY-101 through SY-103
AX-101 through AX-104	T-101 through T-112
AY-101 through AY-102	T-201 through T-204
B-101 through B-112	TX-101 through TX-118
B-201 through B-204	TY-101 through TY-106
BX-101 through BX-112	U-101 through U-112
BY-101 through BY-112	U-201 through U-204
C-101 through C-112	
Savannah River Site - 51 Tanks	
Tank 1 through 51	
Idaho National Engineering and Environmental Laboratory - 15 Tanks	
WM-103 through WM-106	WM-180 through 190

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**Table C-5**  
**Listing of Permitted EPA Hazardous Waste Numbers**

<b>EPA Hazardous Waste Numbers</b>			
F001	D019	D043	U079
F002	D021	P015	U103
F003	D022	P030	U105
F004	D026	P098	U108
F005	D027	P099	U122
F006	D028	P106	U133*
F007	D029	P120	U134*
F009	D030	U002*	U151
D004	D032	U003*	U154*
D005	D033	U019*	U159*
D006	D034	U037	U196
D007	D035	U043	U209
D008	D036	U044	U210
D009	D037	U052	U220
D010	D038	U070	U226
D011	D039	U072	U228
D018	D040	U078	U239*

\* Acceptance of U-numbered wastes listed for reactivity, ignitability, or corrosivity characteristics is contingent upon a demonstration that the wastes no longer exhibit the characteristic of reactivity, ignitability, or corrosivity.

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## FIGURES

3

WASTE STREAM PROFILE FORM

Waste Stream Profile Number: \_\_\_\_\_  
Generator/Storage Site Name: \_\_\_\_\_ Technical Contract: \_\_\_\_\_  
Generator/Storage Site EPA ID: \_\_\_\_\_ Technical Contact Phone Number: \_\_\_\_\_  
Date of audit report approved by NMED: \_\_\_\_\_  
Title, version number and date of documents used for WAP Certification \_\_\_\_\_

Did your facility generate this waste?  Yes  No  
If no, provide the name and EPA ID of the original generator: \_\_\_\_\_

WIPP ID: \_\_\_\_\_ Summary Category Group \_\_\_\_\_  
Waste Stream Name: \_\_\_\_\_  
Description from the WTWBIR: \_\_\_\_\_

Defense Waste:  Yes  No Check one:  CH  RH  
Number of SWBs \_\_\_\_\_ Number of Drums \_\_\_\_\_ Number of Canisters \_\_\_\_\_  
Batch Data Report numbers supporting this waste stream characterization: \_\_\_\_\_  
List applicable EPA Hazardous Waste Numbers <sup>(2)</sup> \_\_\_\_\_  
Applicable TRUCON Content Numbers: \_\_\_\_\_

**Acceptable Knowledge Information**<sup>(1)</sup>  
(for the following, enter supporting documentation used (i.e., references and dates))

**Required Program Information**  
Map of site: \_\_\_\_\_  
Facility mission description: \_\_\_\_\_  
Description of operations that generate waste: \_\_\_\_\_

Waste Identification/categorization schemes: \_\_\_\_\_  
Types and quantities of waste generated: \_\_\_\_\_  
Correlation of waste streams generated from the same building and process, as applicable \_\_\_\_\_

Waste certification procedures: \_\_\_\_\_

**Required Waste Stream Information**  
Area(s) and building(s) from which waste stream was generated: \_\_\_\_\_  
Waste stream volume and time period of generation: \_\_\_\_\_  
Waste generating process description for each building: \_\_\_\_\_  
Waste process flow diagrams: \_\_\_\_\_

Material inputs or other information identifying chemical/radionuclide content and physical waste form: \_\_\_\_\_

Waste material parameter estimates per unit of waste: \_\_\_\_\_

- Which Defense Activity generated the waste (check all that apply)
- Weapons activities including defense inertial confinement fusion
  - Naval reactors development
  - Verification and control technology
  - Defense research and development
  - Defense nuclear waste and material by products management
  - Defense nuclear material production
  - Defense nuclear waste and materials security and safeguards and security investigations

**Figure C-1**  
**WIPP Waste Stream Profile Form (Example Only)**

WASTE STREAM PROFILE FORM

Supplemental Documentation

Process design documents: \_\_\_\_\_  
Standard operating procedures: \_\_\_\_\_  
Safety Analysis Reports: \_\_\_\_\_  
Waste packaging logs: \_\_\_\_\_  
Test plans/research project reports: \_\_\_\_\_  
Site data bases: \_\_\_\_\_  
Information from site personnel: \_\_\_\_\_  
Standard industry documents: \_\_\_\_\_  
Previous analytical data: \_\_\_\_\_  
Material safety data sheets: \_\_\_\_\_  
Sampling and analysis data from comparable/surrogate waste: \_\_\_\_\_  
Laboratory notebooks: \_\_\_\_\_

Confirmation Information<sup>(2)</sup>

(for the following, when applicable, enter procedure title(s), number(s), and date(s))

Radiography: \_\_\_\_\_

Visual Examination: \_\_\_\_\_

Waste characterization procedures used (procedure number, revision number, date): \_\_\_\_\_

**Waste Stream Profile Form Certification**

I hereby certify that I have reviewed the information in this Waste Stream Profile Form, and it is complete and accurate to the best of my knowledge. I understand that this information will be made available to regulatory agencies and that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

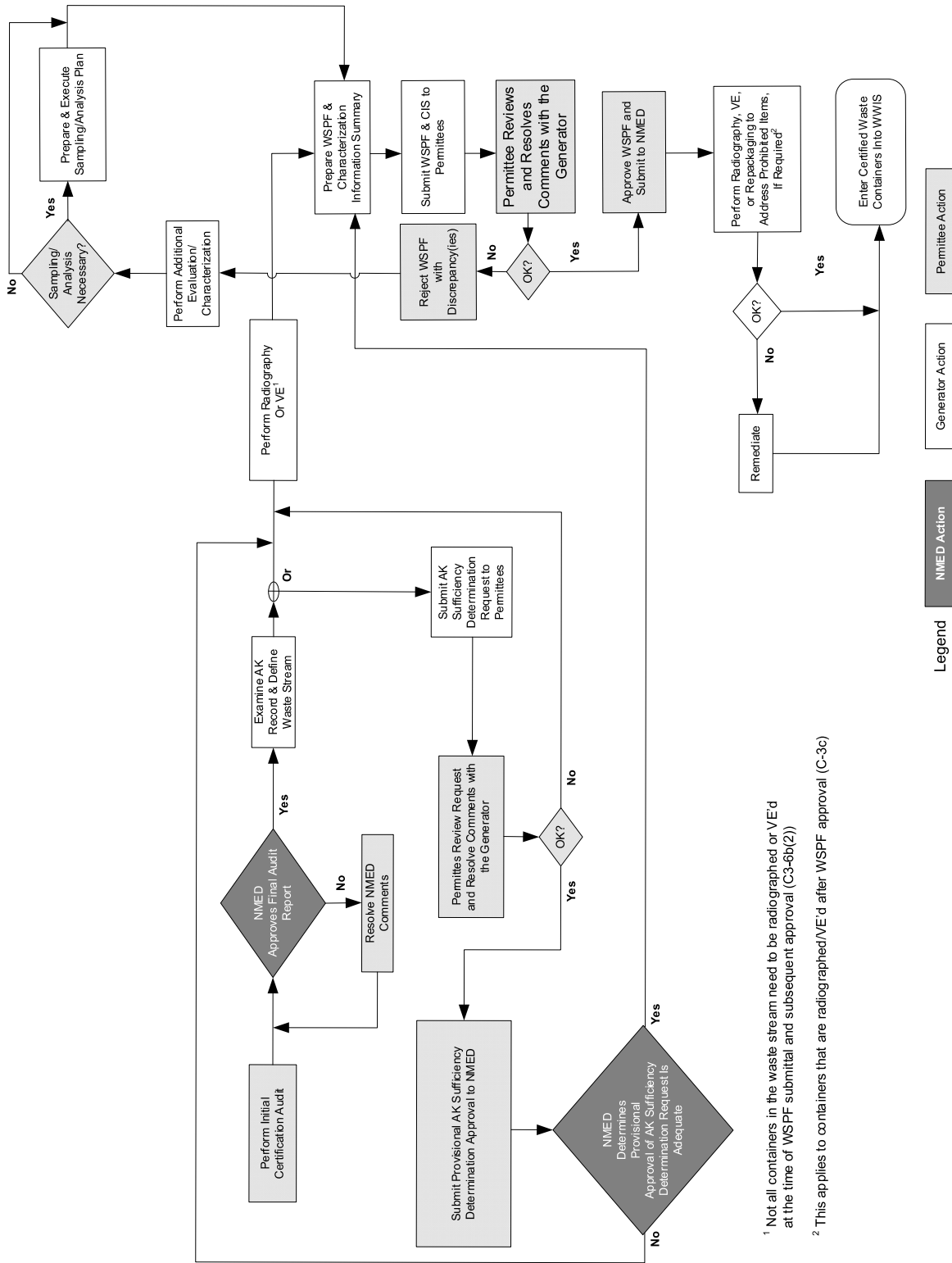
\_\_\_\_\_  
Signature of Site Project Manager

\_\_\_\_\_  
Printed Name and Title

\_\_\_\_\_  
Date

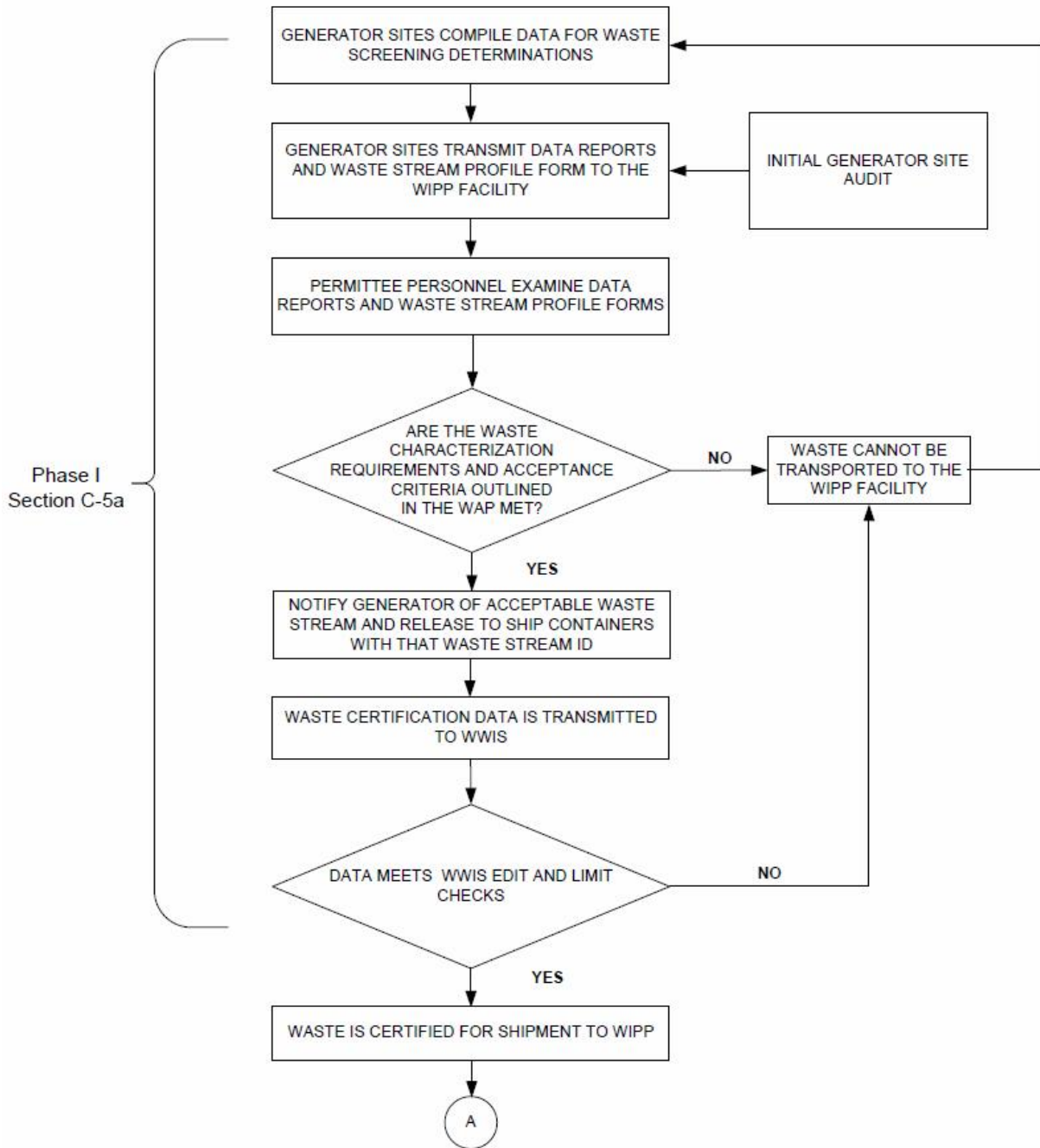
- NOTE: (1) Use back of sheet or continuation sheets, if required.  
(2) If, radiography, visual examination were used to confirm EPA Hazardous Waste Numbers, attach signed Characterization Information Summary documenting this determination.

**Figure C-1**  
**WIPP Waste Stream Profile Form (Example Only – Continued)**

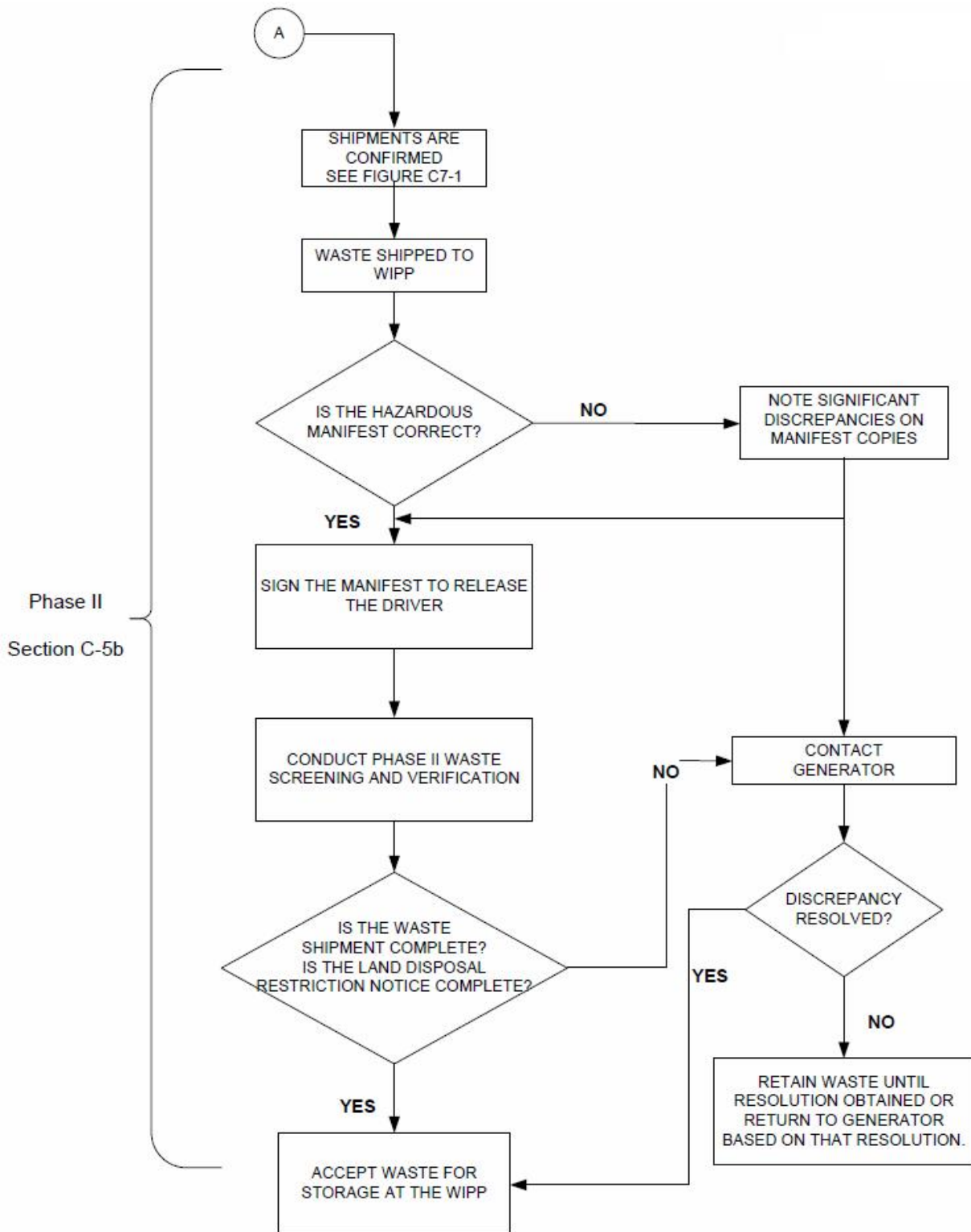


<sup>1</sup> Not all containers in the waste stream need to be radiographed or VE'd at the time of WSPF submittal and subsequent approval (C3-6b(2))  
<sup>2</sup> This applies to containers that are radiographed/VE'd after WSPF approval (C-3c)

**Figure C-2**  
**Waste Characterization Process**



**Figure C-3**  
**TRU Mixed Waste Screening and Verification**



**Figure C-3**  
**TRU Mixed Waste Screening and Verification (Continued)**

**ATTACHMENT C1**  
**WASTE CHARACTERIZATION TESTING METHODS**



**ATTACHMENT C1**  
**WASTE CHARACTERIZATION TESTING METHODS**

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## ATTACHMENT C1

### WASTE CHARACTERIZATION TESTING METHODS

#### Introduction

The Permittees will require generator/storage sites (**sites**) to use the following testing methods, as applicable, for characterization of transuranicTRU mixed waste, which is managed, stored, or disposed at the WIPP facility. These methods include requirements for radiography or visual examination. Additionally, this Attachment provides quality control requirements.

#### C1-1 Radiography

Radiography has been developed by the Permittees specifically to aid in the examination and identification of containerized waste. The Permittees shall require that sites describe **all** activities required to achieve the radiography objectives in site Quality Assurance Project Plans (QAPjPs) and standard operating procedures (SOPs). These SOPs should include instructions specific to the radiography system(s) used at the site. For example, to detect liquids, some systems require the container to be rotated back and forth while other systems require the container to be tilted.

A radiography system (e.g., real time radiography, digital radiography/computed tomography) normally consists of an X-ray-producing device, an imaging system, an enclosure for radiation protection, a waste container handling system, an audio/video recording system, and an operator control and data acquisition station. Although these six components are required, it is expected there will be some variation within a given component between sites. The radiography system shall have controls or an equivalent process which allow the operator to control image quality. On some radiography systems, it should be possible to vary the voltage, typically between 150 to 400 kilovolts ~~(kV)~~, to provide an optimum degree of penetration through the waste. For example, high-density material should be examined with the X-ray device set on the maximum voltage. This ensures maximum penetration through the waste container. Low-density material should be examined at lower voltage settings to improve contrast and image definition. The imaging system typically utilizes either a fluorescent screen and a low-light television camera or x-ray detectors to generate the image.

To perform radiography, the waste container is scanned while the operator views the television screen. A video and audio recording is made of the waste container scan and is maintained as a non-permanent record. A radiography data form is also used to document the Waste Matrix Code to ensure that the waste container contains no ignitable, corrosive, or reactive waste by documenting the absence of liquids in excess of Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (TSDF-WAC) limits or compressed gases, and verify that the physical form of the waste is consistent with the waste stream description documented in the Acceptable Knowledge (AK) Summary. Containers whose contents prevent full examination of the remaining contents shall be subject to visual examination unless the site certifies that visual examination would provide no additional relevant information for that container based on the acceptable knowledgeAK information for the waste stream. Such certification shall be documented in the generator/storage site's record.

1 For containers which contain classified shapes and undergo radiography, the radiography video  
2 and audio recording will be considered classified. The radiography data forms will not contain  
3 classified information.

4 The radiography system involves qualitative and semiquantitative evaluations of visual displays.  
5 Operator training and experience are the most important considerations for ensuring quality  
6 controls in regard to the operation of the radiography system and for interpretation and  
7 disposition of radiography results. Only trained personnel shall be allowed to operate  
8 radiography equipment.

9 Standardized training requirements for radiography operators shall be based upon existing  
10 industry standard training requirements.

11 The Permittees shall require each site to develop a training program that provides radiography  
12 operators with both formal and on-the-job (**OJT**) training. Radiography operators shall be  
13 instructed in the specific waste generating practices, typical packaging configurations, and  
14 associated waste material parameters expected to be found in each Waste Matrix Code at the  
15 site. The OJT and apprenticeship shall be conducted by an experienced, qualified radiography  
16 operator prior to qualification of the training candidate. The training programs will be site-specific  
17 due to differences in equipment, waste configurations, and the level of waste characterization  
18 efforts. For example, certain sites use digital radiography equipment, which is more sensitive  
19 than real-time radiography equipment. In addition, the particular physical forms and packaging  
20 configurations at each site will vary; therefore, radiography operators shall be trained on the  
21 types of waste that are generated, stored, and/or characterized at that particular site.

22 Although the Permittees shall require each site to develop its own training program, all of the  
23 radiography QC-quality-control requirements specified in this WAP shall be incorporated into the  
24 training programs and radiography operations. In this way data quality and comparability will not  
25 be affected.

26 Radiography training programs will be the subject of the Audit and Surveillance Program (Permit  
27 Attachment C6).

28 ~~One or more training~~Training containers ~~with items-~~(including prohibited items and internal  
29 containers of various sizes) common to the waste streams to be characterized and internal  
30 containers of various sizes shall be scanned semiannually by each operator. The audio and  
31 video media shall then be reviewed by a supervisor to ensure that operators' interpretations  
32 remain consistent and accurate. Imaging system characteristics shall be verified on a routine  
33 basis.

34 Independent replicate scans and replicate observations of the video output of the radiography  
35 process shall be performed under uniform conditions and procedures. Independent replicate  
36 scans shall be performed on one waste container per day or once per testing batch, whichever  
37 is less frequent, by a qualified radiography operator that was not involved in the original scan of  
38 the waste container. Independent observations of one scan (not the replicate scan) shall also be  
39 made once per day or once per testing batch, whichever is less frequent, by a qualified  
40 radiography operator that was not involved in the original scan of the waste container. A testing  
41 batch is a suite of waste containers undergoing radiography using the same testing equipment.  
42 A testing batch can be up to 20 waste containers without regard to waste matrix.

1 Oversight functions include periodic audio/video media reviews of accepted waste containers  
2 and shall be performed by qualified radiography operators that were not involved in the original  
3 scans of the waste containers. The results of this independent verification shall be available to  
4 the radiography operators who performed the original scans. The Permittees shall require the  
5 site project manager to be responsible for monitoring the quality of the radiography data and  
6 calling for corrective action, when necessary.

#### 7 C1-2 Visual Examination

8 The waste container contents may be verified directly by visual examination (**VE**) of the waste  
9 container contents. Visual examination may be performed by physically examining the contents  
10 of waste containers to verify the Waste Matrix Code and to verify that the container is properly  
11 included in the appropriate waste stream. Visual examination shall be conducted on a waste  
12 container to identify and describe ~~all~~ waste items, packaging materials, and waste material  
13 parameters in the waste container. Visual examination activities shall be documented on  
14 video/audio media, or by using a second operator to provide additional verification by reviewing  
15 the contents of the waste container to ensure correct reporting. When VE is performed using a  
16 second operator, each operator performing the VE shall observe for themselves the waste being  
17 placed in the waste container or the contents within the examined waste container when waste  
18 is not removed. The results of ~~all~~ VE shall be documented on VE data forms, which are used to  
19 document the Waste Matrix Code, ensure that the waste container contains no ignitable,  
20 corrosive, or reactive waste by documenting the absence of liquids in excess of TSDF-WAC  
21 limits or compressed gases, and to verify that the physical form of the waste is consistent with  
22 the waste stream description documented in the AK Summary.

23 Visual examination recorded on video/audio media shall meet the following minimum  
24 requirements:

- 25 • The video/audio media shall record the waste packaging event for the container such  
26 that ~~all~~ waste items placed into the container are recorded in sufficient detail and shall  
27 contain an inventory of waste items in sufficient detail that another trained VE operator  
28 can identify the associated waste material parameters.
- 29 • The video/audio media shall capture the waste container identification number.
- 30 • The personnel loading the waste container shall be identified on the video/audio media  
31 or on packaging records traceable to the loading of the waste container.
- 32 • The date of loading of the waste container will be recorded on the video/audio media  
33 or on packaging records traceable to the loading of the waste container.

34 Visual examination performed using two generator/storage site personnel shall meet the  
35 following minimum requirements:

- 36 • At least two generator/storage site personnel who witnessed the packaging of the  
37 waste shall approve the data forms or packaging records attesting to the contents of  
38 the waste container.

1           • The data forms or packaging records shall contain an inventory of waste items in  
2           sufficient detail that another trained VE operator can identify the associated waste  
3           material parameters.

4           • The waste container identification number shall be recorded on the data forms or  
5           packaging records.

6 Visual examination video/audio media of containers which contain classified shapes shall be  
7 considered classified information. Visual examination data forms or packaging records will not  
8 contain classified information.

9 Waste container packaging records may be used to meet the VE data quality objectives (**DQOs**)  
10 (Permit Attachment C, Section C-4a(1)). These records must meet the minimum requirements  
11 listed above for either VE recorded on video/audio media or VE performed by two  
12 generator/storage site personnel, and shall be reviewed by operators trained and qualified to the  
13 requirements listed below. The operators will prepare data forms based on the visual  
14 examination records. Visual examination batch data reports will be prepared, reviewed, and  
15 approved as described in Permit Attachment C, Section C-4, and Permit Attachment C3.

16 Standardized training for VE shall be developed. Visual examination operators shall be  
17 instructed in the specific waste generating processes, typical packaging configurations, and  
18 waste material parameters expected to be found in each Waste Matrix Code at the site. The  
19 training shall be site specific to include the various waste configurations generated/stored at the  
20 site. For example, the particular physical forms and packaging configurations at each site will  
21 vary so operators shall be trained to examine the types of waste that are generated, stored,  
22 and/or characterized at that particular site. Training will include the following regardless of  
23 Summary Category Group:

24           • Identifying and describing the contents of a waste container by examining ~~all~~ items in  
25           waste containers of previously packaged waste

26           • Identifying when VE cannot be used to meet the DQOs

27 Visual examination personnel shall be requalified once every two years.

28 Each VE facility shall designate a VE expert. The VE expert shall be familiar with the waste  
29 generating processes that have taken place at that site and also be familiar with ~~all of~~ the types  
30 of waste being characterized at that site. The VE expert shall be responsible for the overall  
31 direction and implementation of the VE at that facility. The Permittees shall require site QAPjPs  
32 to specify the selection, qualification, and training requirements of the VE expert.

1

**ATTACHMENT C2**

2

**RESERVED**



Waste Isolation Pilot Plant  
Hazardous Waste Facility Permit  
Attachment C2

~~March 2013~~ December 2022 Renewal Draft Permit



**ATTACHMENT C3**

**QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION  
TECHNIQUES FOR WASTE CHARACTERIZATION METHODS**

## ATTACHMENT C3

### QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

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## ATTACHMENT C3

### QUALITY ASSURANCE OBJECTIVES AND DATA VALIDATION TECHNIQUES FOR WASTE CHARACTERIZATION METHODS

#### C3-1 Validation Methods

The Permittees shall require the generator/storage sites (**sites**) to perform data validation ~~of all data~~ so that data used for Waste Isolation Pilot Plant (**WIPP**) compliance programs will be of known and acceptable quality.

The qualitative data or descriptive information generated by radiography and visual examination is not amenable to statistical data quality analysis. However, radiography and visual examination are complementary techniques yielding similar data for determining the waste matrix code. The waste matrix code is determined to ensure that the container is properly included in the appropriate waste stream.

Data validation will be used to assess the quality of waste characterization data collected based upon project precision, accuracy, completeness, comparability, and representativeness objectives. These objectives are described below:

#### Precision

Precision is a measure of the mutual agreement among multiple measurements.

#### Accuracy

Accuracy is the degree of agreement between a measured result and the true or known value.

#### Completeness

Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained.

#### Comparability

Comparability is the degree to which one data set can be compared to another.

#### Representativeness

Representativeness is the degree to which a sample ~~represents~~ represent a characteristic of a population.

#### C3-2 Non Destructive Examination Methods

##### Quality Assurance Objectives

The quality assurance objectives (QAOs) for ~~non-destructive non-destructive~~ examination (**NDE**) methods are detailed in this section. Non-destructive examination ~~NDE~~ can be either radiography or visual examination (**VE**). If the QAOs described below are not met, then

1 corrective action shall be taken. It should be noted that NDE is primarily a qualitative  
2 determination. The objective of NDE for the program is to verify that the physical form of the  
3 waste matches the waste stream description as determined by acceptable knowledge (AK) and  
4 the absence of prohibited items. The Permittees shall require each site to describe ~~all~~ activities  
5 required to achieve these objectives in the site quality assurance project plan (**QAPJP**) and  
6 standard operating procedures (**SOPsSOP**).

#### 7 C3-2a Radiography

8 Data to meet these objectives must be obtained from a video and audio recorded scan provided  
9 by trained radiography operators at the sites. Results must also be recorded on a radiography  
10 data form. The precision, accuracy, completeness, and comparability objectives for radiography  
11 data are presented below.

#### 12 Precision

13 Precision is maintained by reconciling any discrepancies between two radiography operators  
14 with regard to identification of the waste matrix code, liquids in excess of Treatment, Storage,  
15 and Disposal Facility Waste Acceptance Criteria (TSDF-WAC) limits, and compressed gases  
16 through independent replicate scans and independent observations. Additionally, the precision  
17 of radiography is verified prior to use by tuning precisely enough to demonstrate compliance  
18 with QAOs through viewing an image test pattern.

#### 19 Accuracy

20 Accuracy is obtained by using a target to tune the image for maximum sharpness and by  
21 requiring operators to successfully identify 100 percent of the items required to meet the data  
22 quality objectives (DQOs) for radiography specified in Permit Attachment C, Section C-4a(1) in  
23 a training container during their initial qualification and subsequent requalification.

#### 24 Completeness

25 A video and audio media recording of the radiography examination and a validated radiography  
26 data form will be obtained for 100 percent of the waste containers subject to radiography. ~~All~~  
27 videeVideo and audio media recordings and radiography data forms will be subject to validation  
28 as indicated in Section C3-4.

#### 29 Comparability

30 The comparability of radiography data from different operators shall be enhanced by using  
31 standardized radiography procedures and operator qualifications.

#### 32 C3-2b Visual Examination

33 Results must be recorded on a VE data form. The precision, accuracy, completeness, and  
34 comparability objectives for VE data are presented below.

1 Precision

2 Precision is maintained by reconciling any discrepancies between the operator and the  
3 independent technical reviewer with regard to identification of waste matrix code, liquids in  
4 excess of TSDF-WAC limits, and compressed gases.

5 Accuracy

6 Accuracy is maintained by requiring operators to pass a comprehensive examination and  
7 demonstrate satisfactory performance in the presence of the VE expert during their initial  
8 qualification. Visual examinationVE operators shall be requalified every two years.

9 Completeness

10 A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.

11 Comparability

12 The comparability of VE data from different operators shall be enhanced by using standardized  
13 VE procedures and operator qualifications.

14 C3-3 Acceptable Knowledge

15 Acceptable knowledge ~~documentation~~ provides primarily qualitative information that cannot be  
16 assessed according to specific data quality goals that are used for quantitative techniques. To  
17 ensure that the AK ~~acceptable knowledge~~ process is consistently applied, the Permittees shall  
18 require sites to comply with the following data QAOs ~~quality requirements~~ for acceptable  
19 ~~knowledge documentation~~ AK:

- 20 • Precision - The qualitative determinations, such as compiling and assessing  
21 ~~acceptable knowledge documentation~~ AK, do not lend themselves to statistical  
22 evaluations of precision. However, the ~~acceptable knowledge information~~ AK will be  
23 addressed by ~~the~~ independent reviews ~~review of acceptable knowledge information~~  
24 during internal and external audits.
- 25 • Accuracy - The percentage of waste containers which require reassignment to a  
26 new waste matrix code and/or designation of different U.S. Environmental  
27 Protection Agency (EPA) hazardous waste numbers based on testing data and  
28 discrepancies identified by the Permittees during waste confirmation will be  
29 reported as a measure of ~~acceptable knowledge~~ AK accuracy.
- 30 • Completeness - The AK ~~acceptable knowledge~~ record must contain 100 percent of  
31 the required information (Permit Attachment C4, Section C4-3). The usability of the  
32 AK ~~acceptable knowledge~~ information will be assessed for completeness during  
33 audits.
- 34 • Comparability - Comparability is ensured through sites meeting the training  
35 requirements and complying with the minimum standards outlined for procedures  
36 that are used to implement the ~~acceptable knowledge~~ AK process. All sites must  
37 assign hazardous waste numbers in accordance with Permit Attachment C4-3b

1 and provide this information regarding its waste to other sites who store or  
2 generate a similar waste stream.

- 3
- 4 • Representativeness - Representativeness is a qualitative parameter that will be  
5 satisfied by ensuring that the process of obtaining, evaluating, and documenting  
6 ~~acceptable knowledgeAK~~ information is performed in accordance with the  
7 minimum standards established in Permit Attachment C4, Section C4-3. Sites also  
8 must assess and document the limitations of the ~~acceptable knowledgeAK~~  
9 information used to assign EPA hazardous waste numbers (e.g., purpose and  
10 scope of information, date of publication, type and extent to which waste  
parameters are addressed).

11 The Permittees shall require each generator/storage site to comply with the nonconformance  
12 notification and reporting requirements of Section C3-7 if the results of testing specified in  
13 Permit Attachment C are inconsistent with ~~acceptable knowledgeAK~~ documentation.

14 The Permittees shall require each site to address quality control by tracking its performance with  
15 regard to the use of ~~acceptable knowledgeAK~~ by: 1) assessing the frequency of inconsistencies  
16 among information, and 2) documenting ~~acceptable knowledgeAK~~ inconsistencies identified  
17 through radiography and visual examination. In addition, the ~~acceptable knowledgeAK~~ process  
18 and waste stream documentation must be evaluated through internal assessments by  
19 generator/storage site quality assurance organizations and assessments by auditors external to  
20 the organization (i.e., the Permittees).

#### 21 C3-4 Data Review, Validation, and Verification Requirements

22 Procedures shall be developed for the review, validation, and verification of data at the data  
23 generation level; the validation and verification of data at the project level; and the verification of  
24 data at the Permittee level. Data review determines if raw data have been properly collected  
25 and ensures raw data are properly reduced. Data validation verifies that the data reported  
26 satisfy the requirements of this Waste Analysis Plan (WAP) and is accompanied by signature  
27 release. Data verification authenticates that data as presented represent the testing activities as  
28 performed and have been subject to the appropriate levels of data review. The requirements  
29 presented in this section ensure that WAP records furnish documentary evidence of quality.

30 The Permittees shall require the sites to generate the following Batch Data Reports (BDRs) for  
31 data validation, verification, and quality assurance activities:

- 32
- 33 • A Testing ~~Batch Data Report~~BDR or equivalent includes **all** data pertaining to  
34 radiography or visual examination for up to 20 waste containers without regard to  
35 waste matrix. Table C3-3 lists ~~all of~~ the information required in Testing ~~Batch Data~~  
36 ~~Reports~~BDRs (identified with an "X") and other information that is necessary for  
37 data validation, but is optional in Testing ~~Batch Data Reports~~BDRs (identified with  
an "O").

#### 38 C3-4a Data Generation Level

39 The following are minimum requirements for raw data collection and management which the  
40 Permittees shall require for each site:



- 1 • ~~All raw~~Raw data shall be signed and dated in reproducible ink by the person  
2 generating it. Alternately, unalterable electronic signatures may be used.
- 3 • ~~All data~~Data must be recorded clearly, legibly, and accurately in field records.
- 4 • ~~All changes~~Changes to original data must be lined out, initialed, and dated by the  
5 individual making the change. A justification for changing the original data may also  
6 be included. Original data must not be obliterated or otherwise disfigured; data  
7 must be so as not to be unreadable~~readable~~. Data changes shall only be made by  
8 the individual who originally collected the data or an individual authorized to  
9 change the data.
- 10 • ~~All data~~Data must be transferred and reduced from field records completely and  
11 accurately.
- 12 • ~~All field~~Field records must be maintained as specified in Permit Attachment C,  
13 Table C-2~~of Attachment C~~.
- 14 • Data must be organized into a standard format for reporting purposes (~~Batch Data~~  
15 ~~Report~~BDR), as outlined in specific testing procedures.
- 16 • ~~All electronic~~Electronic and video data must be stored appropriately to ensure that  
17 waste container and associated quality control (QC)~~QC~~ data are readily retrievable.  
18 In the case of classified information, additional security provisions may apply that  
19 could restrict retrievability. The additional security provisions will be documented in  
20 generator/storage site procedures as outlined in the QAPjP in accordance with  
21 prevailing classified information security standards.

22 Data review, validation, and verification at this level involves scrutiny and signature release from  
23 qualified independent technical reviewer(s) not involved in the generation or recording of the  
24 data under review, as specified below. Individuals conducting this data review, validation, and  
25 verification must use checklists that address ~~all of~~ the items included in this section. Completed  
26 checklists must be forwarded with ~~Batch Data Reports~~BDRs to the project level.

#### 27 C3-4a(1) Independent Technical Review

28 The independent technical review ensures by review of raw data that data generation and  
29 reduction are technically correct; calculations are verified correct; deviations are documented;  
30 and quality assurance (QA)/QC~~QA/QC~~ results are complete, documented correctly, and  
31 compared against WAP criteria. This review validates and verifies ~~all of~~ the work documented  
32 by the originator.

33 One hundred percent of the ~~Batch Data Reports~~BDRs must receive an independent technical  
34 review by a trained and qualified individual who was not involved in the generation or recording  
35 of the data under review. This review shall be performed by an individual other than the data  
36 generator who is qualified to have performed the initial work. The independent technical review  
37 must be performed as soon as practicably possible in order to determine and correct negative  
38 quality trends in the testing process. However, at a minimum, the independent technical review  
39 must be performed before any waste associated with the data reviewed is managed, stored, or

1 disposed at the WIPP facility. The reviewer(s) must release the data as evidenced by signature,  
2 and as a consequence ensure the following:

- 3 • Data generation and reduction were conducted in a technically correct manner in  
4 accordance with the methods used (procedure with revision). Data were reported  
5 in the proper units and correct number of significant figures.
- 6 • Calculations have been verified by a valid calculation program, a spot check of  
7 verified calculation programs, and/or 100 percent check of ~~all~~ hand calculations.  
8 Values that are not verifiable to within rounding or significant difference  
9 discrepancies must be rectified prior to completion of independent technical review.
- 10 • The data have been reviewed for transcription errors.
- 11 • The testing data QA documentation for ~~Batch Data Reports~~BDRs is complete and  
12 includes, as applicable, raw data, calculation records, calibration records (or  
13 references to an available calibration package). Corrective action will be taken to  
14 ensure that ~~all Batch Data Reports~~BDRs are complete and include ~~all~~ necessary  
15 raw data prior to completion of the independent technical review.
- 16 • Radiography tapes have been reviewed (independent observation) on a waste  
17 container basis at a minimum of once per testing batch or once per day of  
18 operation, whichever is less frequent (Attachment C1, Section C1-1). The  
19 radiography tape will be reviewed against the data reported on the radiography  
20 form to ensure that the data are correct and complete.
- 21 • QAOs have been met according to the methods outlined in Sections C3-2 and  
22 C3-3.

### 23 C3-4b Project Level

24 Data validation and verification at this level involves scrutiny and signature release from the Site  
25 Project Manager (or designee). The Permittees shall require each site to meet the following  
26 minimum requirements for each waste container. ~~Any~~A nonconformance identified during this  
27 process shall be documented on a nonconformance report (Section C3-7).

28 The Site Project Manager shall ensure that a repeat of the data generation level review,  
29 validation, and verification is performed on the data for a minimum of one randomly chosen  
30 waste container quarterly (every three months). This exercise will document that the data  
31 generation level review, validation, and verification is being performed according to  
32 implementing procedures.

### 33 C3-4b(1) Site Project Manager Review

34 The Site Project Manager Review is the final validation that ~~all of~~ the data contained in ~~Batch~~  
35 ~~Data Reports~~BDRs from the data generation level are complete and have been properly  
36 reviewed as evidenced by signature release and completed checklists.

37 One hundred percent of the ~~Batch Data Reports~~BDRs must have Site Project Manager  
38 signature release. At a minimum, the Site Project Manager signature release must be performed

1 before any waste associated with the data reviewed is managed, stored, or disposed at the  
2 WIPP facility. This signature release must ensure the following:

- 3 • Testing batch QC checks (e.g., replicate scans, measurement system checks)  
4 were properly performed. Radiography data are complete and acceptable based  
5 on evidence of videotape review of one waste container per day or once per testing  
6 batch, whichever is less frequent, as specified in Permit Attachment C1, Section  
7 C1-1.
- 8 • Data generation level independent technical review, validation, and verification  
9 have been performed as evidenced by the completed review checklists and  
10 appropriate signature releases.
- 11 • Independent technical reviewers were not involved in the generation or recording  
12 of the data under review.
- 13 • Batch data review checklists are complete.
- 14 • Batch Data Reports are complete and data are properly reported (e.g., data are  
15 reported in the correct units, and with the correct number of significant figures).
- 16 • Verify that data are within established data assessment criteria and meet all the  
17 applicable QAOs (Sections C3-2 and C3-3).

18 C3-4b(2) Prepare Site Project Manager Summary and Data Validation Summary

19 To document the project-level validation and verification described above, the Permittees shall  
20 require each Site Project Manager (or designee) to prepare a Site Project Manager Summary  
21 and a Data Validation Summary. These reports may be combined to eliminate redundancy. The  
22 Site Project Manager Summary includes a validation checklist for each ~~BDR~~Batch Data Report.  
23 Checklists for the Site Project Manager Summary must be sufficiently detailed to validate all  
24 aspects of a ~~BDR~~Batch Data Report that affect data quality. The Data Validation Summary  
25 provides verification that, on a per waste container basis as evidenced by ~~Batch Data~~  
26 Report~~BDR~~ reviews, all data have been validated in accordance with the site QAPJP. The Data  
27 Validation Summary must identify each ~~Batch Data Report~~BDR reviewed (including all waste  
28 container numbers), describe how the validation was performed and whether or not problems  
29 were detected (e.g., nonconformance reports), and include a statement indicating that all the  
30 data are acceptable. Summaries must include release signatures.

31 C3-4b(3) Prepare Waste Stream Characterization Package

32 In the event the Permittees request detailed information on a waste stream, the Site Project  
33 Manager will provide a Waste Stream Characterization Package. The Site Project Manager  
34 must ensure that the Waste Stream Characterization Package (Section C3-6b(3)) will support  
35 waste characterization determinations.

36 C3-4c Permittee Level

37 The final level of data verification occurs at the Permittee level and must, at a minimum, consist  
38 of reviewing a sample of the ~~Batch Data Reports~~BDRs during audits of generator/storage sites

1 to verify completeness. During such audits, the DOE is responsible for the verification that ~~Batch~~  
2 ~~Data Reports~~BDRs include the following:

- 3 • Project-level signature releases
- 4 • Listing of ~~all~~the waste containers being presented in the report
- 5 • Listing of ~~all~~the testing, batch numbers associated with each waste container  
6 being reported in the package
- 7 • Site Project Manager Summary
- 8 • Data Validation Summary

9 For each Waste Stream Profile Form (**WSPF**) submitted for approval, DOE must verify that each  
10 submittal (i.e., WSPF and Characterization Information Summary) is complete and notify the  
11 originating site in writing of the WSPF approval. The DOE will maintain the data as appropriate  
12 for use in the regulatory compliance programs. For subsequent shipments made after the initial  
13 WSPF approval, the verification will also include WWIS internal limit checks (Permit Attachment  
14 C, Section C-5a(1)).

#### 15 C3-5 Reconciliation with Data Quality Objectives

16 Reconciling the results of waste testing with the DQOs provides a way to ensure that data will  
17 be of adequate quality to support the regulatory compliance programs. Reconciliation with the  
18 DQOs will take place at both the project level and the Permittees' level. At the project level,  
19 reconciliation will be performed by the Site Project Manager, while at the Permittees' level,  
20 reconciliation will be performed as described below.

#### 21 C3-5a Reconciliation at the Project Level

22 The Permittees shall require each Site Project Manager to ensure that ~~all~~the data generated  
23 and used in decision making meet the DQOs provided in Permit Attachment C, Section C-4a(1)  
24 ~~of Permit Attachment C~~. To do so, the Site Project Manager must assess whether data of  
25 sufficient type, quality, and quantity have been collected. For each waste stream characterized,  
26 the Permittees shall require each Site Project Manager to determine if sufficient data have been  
27 collected to determine the following WAP-required waste parameters, as applicable:

- 28 • Waste matrix code
- 29 • Waste material parameter weights
- 30 • If each waste container of waste contains transuranic (TRU)~~TRU~~ radioactive waste
- 31 • Whether the waste stream exhibits a toxicity characteristic (**TC**) under 20.4.1.200  
32 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of  
33 Federal Regulations (CFR) Part 261, Subpart C)
- 34 • Whether the waste stream contains listed waste found in 20.4.1.200 NMAC  
35 (incorporating 40 CFR Part 261, Subpart D)

- 1 • Whether the waste stream can be classified as hazardous or nonhazardous
- 2 • Whether the overall completeness, comparability, and representativeness QAOs
- 3 were met for each of the testing procedures as specified in Sections C3-2 and C3-
- 4 3 prior to submittal of a WSPF for a waste stream or waste stream lot.

5 If the Site Project Manager determines that insufficient data have been collected to make the  
6 determinations listed above, additional data collection efforts must be undertaken. The  
7 reconciliation of a waste stream shall be performed, as described in Permit Attachment C4, prior  
8 to submittal of WSPF and Characterization Information Summary (CIS) to the Permittees for  
9 that waste stream. The Permittees shall not manage, store, or dispose a TRU mixed waste  
10 stream at the WIPP facility unless the Site Project Manager determines that the WAP-required  
11 waste parameters listed above have been met for that waste stream.

#### 12 C3-5b Reconciliation at the Permittee Level

13 The Permittees must also ensure that data of sufficient type, quality, and quantity are collected  
14 to meet WAP DQOs. The Permittees will ensure sufficient data have been collected to  
15 determine if the waste characterization information is adequate to demonstrate the Permittees'  
16 compliance with Permit Attachment C, Section C-4a(1). This is performed during the Permittees'  
17 review of the WSPF and ~~CIS Characterization Information Summary~~ and is documented by the  
18 DOE's approval of the WSPF.

#### 19 C3-6 Data Reporting Requirements

20 Data reporting requirements define the type of information and the method of transmittal for data  
21 transfer from the data generation level to the project level and from the project level to the  
22 Permittees.

#### 23 C3-6a Data Generation Level

24 Data shall be transmitted by hard copy or electronically (provided a hard copy is available on  
25 demand) from the data generation level to the project level. Transmitted data shall include ~~all~~  
26 ~~Batch Data ReportsBDRs~~ and data review checklists. The ~~Batch Data ReportsBDRs~~ and  
27 checklists used must contain ~~all of~~ the information required by the testing techniques described  
28 in Permit Attachments C1 through C6, as well as the signature releases to document the review,  
29 validation, and verification as described in Section C3-4. ~~All~~ Batch Data Reports and checklists  
30 shall be in approved formats, as provided in site-specific documentation.

31 Batch Data Reports shall be forwarded to the Site Project Manager. ~~All~~ Batch Data Reports  
32 shall be assigned serial numbers, and each page shall be numbered. The identificationserial  
33 number used for ~~Batch Data ReportsBDRs~~ can be the same as the testing batch number.

34 QA-Quality assurance documentation, including raw data, shall be maintained in either testing  
35 facility files, or site project files for those facilities located on site in accordance with the  
36 document storage requirements of site approved site QAPjPs.

1 C3-6b Project Level

2 The site project office shall prepare a WSPF for each waste stream certified for shipment to the  
3 WIPP facility based on information obtained from acceptable knowledgeAK and Batch Data  
4 ReportsBDRs, if applicable. In addition, the site project office must ensure that the  
5 CISCharacterization Information Summary and the Waste Stream Characterization Package  
6 (when requested by the Permittees) are prepared as appropriate. The Site Project Manager  
7 must also verify these reports are consistent with information found in batch reports.  
8 Summarized testing data are included in the CISCharacterization Information Summary. The  
9 contents of the WSPF, CISCharacterization Information Summary, and Waste Stream  
10 Characterization Package are discussed in the following sections.

11 After approval of a WSPF and the associated CISCharacterization Information Summary by the  
12 DOE, the generator/storage site are required to maintain a cross reference of container  
13 identification numbers to each BDRBatch Data Report.

14 A Waste Stream Characterization Package shall be transmitted by hard copy or electronically  
15 from the Site Project Manager to the Permittees when requested.

16 C3-6b(1) Waste Stream Profile Form

17 The Waste Stream Profile FormWSPF (WSPF, Permit Attachment C, Figure C-1) shall include  
18 the following information:

- 19 • Generator/storage site name
- 20 • Generator/storage site EPA ID
- 21 • Date of audit report approval by NMED (if obtained)
- 22 • Original generator of waste stream
- 23 • Whether waste is Contact Handled-contact-handled or remote-handledRemote-  
24 Handled
- 25 • The Waste Stream WIPP Identification Number
- 26 • Summary Category Group
- 27 • Waste Matrix Code Group
- 28 • Waste Material Parameter Weight Estimates per unit of waste
- 29 • Waste stream name
- 30 • A description of the waste stream
- 31 • Applicable EPA hazardous waste numbers
- 32 • Applicable TRUCON codes

- 1           • A listing of ~~acceptable knowledge~~AK documentation used to identify the waste
- 2           stream
  
- 3           • The waste characterization procedures used and the revision number and date of
- 4           the procedure
  
- 5           • Certification signature of Site Project Manager, name, title, and date signed

6    C3-6b(2) Characterization Information Summary

7    The ~~CIS~~Characterization Information Summary shall include the following elements, if

8    applicable:

- 9           • Data reconciliation with DQOs
  
- 10          • Radiography and VE summary to document that ~~all~~ prohibited items are absent in
- 11          the waste and to verify that the physical form of the waste matches the waste
- 12          stream description as determined by AK (if applicable).
  
- 13          • A justification for the selection of radiography and/or VE as an appropriate method
- 14          for characterizing the waste.
  
- 15          • A complete listing of ~~all the~~ container identification numbers used to generate the
- 16          WSPF, cross-referenced to each ~~BDR~~Batch Data Report
  
- 17          • Complete AK summary, including stream name and number, point of generation,
- 18          waste stream volume (current and projected), generation dates, TRUCON codes,
- 19          Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group,
- 20          other ~~TRU Waste Baseline Inventory Report~~TWBIR information, waste stream
- 21          description, areas of operation, generating processes, Resource Conservation and
- 22          Recovery Act~~RCRA~~ determinations, radionuclide information, ~~all the~~ references
- 23          used to generate the AK summary, and any other information required by Permit
- 24          Attachment C4, Section C4-2b.
  
- 25          • Method for determining Waste Material Parameter Weights per unit of waste.
  
- 26          • List of ~~any~~ AK Sufficiency Determinations requested for the waste stream, if
- 27          applicable.
  
- 28          • Certification through ~~acceptable knowledge~~AK or testing that any waste assigned
- 29          the EPA hazardous waste number of U134 (hydrofluoric acid) no longer exhibits
- 30          the characteristic of corrosivity. This is verified by ensuring that no liquid is present
- 31          in U134 waste.



1 C3-6b(3) Waste Stream Characterization Package

2 The Waste Stream Characterization Package includes the following information:

- 3 • Waste Stream Profile Form (~~WSPF~~, Section C3-6b(1))
- 4 • Accompanying CIS Characterization Information Summary (Section C3-6b(2))
- 5 • Complete AK summary (Section C3-6b(2))
- 6 • Batch Data Reports supporting the characterization of the waste stream and any others
- 7 requested by the Permittees
- 8 • Raw testing data requested by the Permittees

9 C3-6b(4) WIPP Waste Information System (~~WWIS~~) Data Reporting

10 The WIPP Waste Information System (WWIS)~~WWIS~~ Data Dictionary includes ~~all of~~ the data  
11 fields, the field format and the limits associated with the data as established by this WAP. These  
12 data will be subjected to edit and limit checks that are performed automatically by the database,  
13 as defined in the *Waste Data System User's Manual* (DOE, 2019~~2009~~).

14 C3-7 Nonconformances

15 The Permittees shall require the status of work and the WAP activities at participating  
16 generator/storage sites to be monitored and controlled by the Site Project Manager. This  
17 monitoring and control shall include nonconformance identification, documentation, and  
18 reporting.

19 The nonconformances and corrective action processes specified in this section describe  
20 procedures between the Permittees and the generator/storage sites as the means to control and  
21 disposition nonconforming items and nonconforming activities.

22 Nonconformances

23 Nonconformances are uncontrolled and unapproved deviations from an any applicable  
24 approved plan or procedure. Nonconforming items and nonconforming activities are those that  
25 do not meet the WAP requirements, procurement document criteria, or approved work  
26 procedures. Nonconforming activities shall be identified and noted in applicable generator site  
27 corrective action documents, such as Generator Site Technical Reviews (GSTRs) or  
28 comparable site-specific reviews and assessments. Nonconforming items shall be identified by  
29 marking, tagging, or segregating, and the affected generator/storage site(s) notified. Any waste  
30 container for which a nonconformance report (NCR) has been written will not be shipped to the  
31 WIPP facility unless the condition that led to the NCR for that container has been dispositioned  
32 in accordance with DOE's Quality Assurance Program Description (QAPD). Disposition of  
33 nonconforming items or nonconforming activities shall be identified and documented. The  
34 QAPjPs shall identify the person(s) responsible for evaluating and dispositioning nonconforming  
35 items or nonconforming activities and shall include referenced procedures for handling them.  
36 For each container selected for confirmation pursuant to Permit Attachment C7, the Permittees

1 will examine the respective NCR documentation to verify NCRs have been dispositioned for the  
2 selected container.

3 Management ~~at all levels~~ shall foster a “no-fault” attitude to encourage the identification of  
4 nonconforming items and processes. Nonconformances may be detected and identified by  
5 anyone performing WAP activities or non-WAP RCRA related activities (i.e., site-specific  
6 reviews and assessments, such as GSTRs, affecting WIPP Permit compliance), including

- 7 • Project staff - during field operations, supervision of subcontractors, data validation  
8 and verification, and self-assessment
- 9 • Testing Facility staff - during the preparation for and performance of laboratory  
10 testing; calibration of equipment; QC activities; data review, validation, and  
11 verification; and self-assessment
- 12 • QA personnel - during oversight activities or audits

13 A NCR shall be prepared for each nonconformance identified. Each NCR shall be initiated by  
14 the individual(s) identifying the nonconformance. The NCR shall then be processed by  
15 knowledgeable and appropriate personnel. For this purpose, a NCR including, or referencing as  
16 appropriate, results of QC tests, audit reports, internal memoranda, or letters shall be prepared.  
17 The NCR must provide the following information:

- 18 • Identification of the individual(s) identifying or originating the nonconformance
- 19 • Description of the nonconformance
- 20 • Method(s) or suggestions for correcting the nonconformance (corrective action)
- 21 • Schedule for completing the corrective action
- 22 • An indication of the potential ramifications and overall usability of the data, if applicable
- 23 • Any approval signatures specified in the site nonconformance procedures

24 The Permittees shall require the Site Project Manager to oversee the NCR process and be  
25 responsible for developing a plan to identify and track ~~all~~ nonconformances and report this  
26 information to the Permittees. The Site Project Manager is also responsible for notifying project  
27 personnel of the nonconformance and verifying completion of the corrective action for  
28 nonconformances.

### 29 Nonconformance to DQOs

30 For any non-administrative nonconformance related to applicable requirements specified in this  
31 WAP which are first identified at the Site Project Manager signature release level (i.e., a failure  
32 to meet a DQO), the Permittees shall receive written notification within seven calendar days of  
33 identification and shall also receive a NCR within 30 calendar days of identification of the  
34 incident. The DOE shall require the generator/storage site to implement a corrective action  
35 which remedies the nonconformance prior to management, storage, or disposal of the waste at  
36 the WIPP facility. The Permittees shall send NMED a monthly summary of nonconformances  
37 identified during the previous month, indicating the number of nonconformances received and  
38 the generator/storage sites responsible. If nonconformances are not identified in a given month,  
39 a report is not required.

## 1 DOE's Corrective Action Process

2 The DOE shall initiate a corrective action process when internal nonconformances and  
3 nonconformances at the generator/storage sites are identified. Activities and processes that do  
4 not meet requirements are documented as deficiencies.

5 When a deficiency is identified by the Permittees, the following process action steps are  
6 required:

- 7 • The condition is documented on a Corrective Action Report (**CAR**) by the individual  
8 identifying the problem.
- 9 • The DOE has designated the CAR Initiator and Assessment Team Leader to  
10 review the CAR, determine validity of the finding (determine that a requirement has  
11 been violated), classify the significance of the condition, assign a response due  
12 date, and issue the CAR to the responsible party.
- 13 • The responsible organization reviews the CAR, evaluates the extent and cause of  
14 the deficiency and provides a response to DOE, indicating remedial actions and  
15 actions to preclude recurrence that will be taken.
- 16 • The DOE reviews the response from the responsible organization and, if  
17 acceptable, communicates the acceptance to the responsible organization.
- 18 • The responsible organization completes remedial actions and actions to preclude  
19 recurrence of the condition.
- 20 • After ~~all~~the corrective actions have been completed, DOE schedules and performs  
21 a verification to ensure that corrective actions have been completed and are  
22 effective. When ~~all~~the corrective actions have been completed and verified as  
23 being effective, the CAR is closed by the CAR Initiator and Assessment Team  
24 Leader on behalf of DOE.
- 25 • As part of the planning process for subsequent audits and surveillances, past  
26 deficiencies are reviewed and the previous deficient activity or process is subject to  
27 reassessment.

## 28 C3-8 Special Training Requirements and Certifications

29 Before performing activities that affect WAP quality, ~~all~~ personnel are required to receive  
30 indoctrination into the applicable scope, purpose, and objectives of the WAP and the specific  
31 QAOs of the assigned task. Personnel assigned to perform activities for the WAP shall have the  
32 education, experience, and training applicable to the functions associated with the work.  
33 Evidence of personnel proficiency and demonstration of competence in the task(s) assigned  
34 must be demonstrated and documented. ~~All personnel~~Personnel designated to work on specific  
35 aspects of the WAP shall maintain qualification (i.e., training and certification) throughout the  
36 duration of the work as specified in this WAP and applicable QAPjPs/procedures. Job  
37 performance shall be evaluated and documented at periodic intervals, as specified in the  
38 implementing procedures.

1 Personnel involved in WAP activities shall receive continuing training to ensure that job  
2 proficiency is maintained. If not specified by this WAP, the due date for required continuing  
3 training courses and requalification shall be the end of the month of the anniversary date when  
4 the training was previously completed. Training includes both education in principles and  
5 enhancement of skills. Each participating site shall include in its QAPjP a description of the  
6 procedures for implementing personnel qualification and training. ~~All training~~Training records  
7 that specify the scope of the training, the date of completion, and documentation of job  
8 proficiency shall be maintained as QA Records in the site project file.

9 The minimum qualifications for certain specified positions for the WAP are summarized in Table  
10 C3-2. QAPjPs, or their implementing SOPs, shall specify the site-specific titles and minimum  
11 training and qualification requirements for personnel performing WAP activities.  
12 QAPjPs/procedures shall also contain the requirements for maintaining records of the  
13 qualification, training, and demonstrations of proficiency by these personnel.

14 An evaluation of personnel qualifications shall include comparing and evaluating the  
15 requirements specified in the job/position description and the skills, training, and experience  
16 included in the current resume of the person. This evaluation also must be performed for  
17 personnel who change positions because of a transfer or promotion as well as personnel  
18 assigned to short-term or temporary work assignments that may affect the quality of the WAP.  
19 QAPjPs/procedures shall identify the responsible person(s) for ensuring that ~~all~~ personnel  
20 maintain proficiency in the work performed and identify any additional training that may be  
21 required.

#### 22 C3-9 Changes to WAP-Related Plans or Procedures

23 Controlled changes to WAP-related plans or procedures shall be managed through the  
24 document control process described in the QAPD. The Site Project Manager shall review ~~all the~~  
25 non-administrative changes and evaluate whether those changes could impact DQOs specified  
26 in the Permit. After site certification, any changes to WAP-related plans or procedures that could  
27 positively or negatively impact DQOs (i.e., those changes that require prior approval of ~~the~~ DOE  
28 as defined in Attachment C5, Section C5-2) shall be reported to ~~the~~ DOE within five days of  
29 identification by the project level review. The Permittees shall send ~~the~~ NMED a monthly  
30 summary briefly describing the changes to data-quality affecting plans and procedures identified  
31 pursuant to this section during the previous month. If changes to data-quality affecting plans and  
32 procedures are not identified in a given month, a report is not required.

#### 33 C3-10 List of References

34 DOE, ~~20192009~~. Waste Data System User's Manual. DOE/WIPP 09-3427, Current Revision,  
35 Carlsbad, New Mexico, Carlsbad Area Office, U.S. Department of Energy.

36 ~~Pasternack B. S. and N. H. Harley, 1971. "Detection Limits for Radionuclides in the Analysis of~~  
37 ~~Multi-Component Gamma Spectrometric Data." Nucl. Instr. and Meth, No. 91: pp. 533-40.~~

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## **TABLES**

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**Table C3-1  
 Waste Material Parameters and Descriptions**

<b>Waste Material Parameter</b>	<b>Description</b>
Iron-based Metals/Alloys	Iron and steel alloys in the waste; does not include the waste container materials
Aluminum-based Metals/Alloys	Aluminum or aluminum-based alloys in the waste materials
Other Metals	<del>All other</del> Other metals found in the waste materials
Other Inorganic Materials	Nonmetallic inorganic waste including concrete, glass, firebrick, ceramics, sand, and inorganic sorbents
Cellulosics	Materials generally derived from high-polymer plant carbohydrates; (e.g., paper, cardboard, wood, and cloth)
Rubber	Natural or man-made elastic latex materials; (e.g., surgeons' gloves, and leaded rubber gloves)
Plastics (waste materials)	Generally man-made materials, often derived from petroleum feedstock; (e.g., polyethylene and polyvinylchloride)
Organic Matrix	Cemented organic resins, solidified organic liquids and sludges
Inorganic Matrix	Any homogeneous materials consisting of sludge or aqueous-based liquids that are solidified with cement, calcium silicate, or other solidification agents; (e.g., wastewater treatment sludge, cemented aqueous liquids, and inorganic particulates)
Soils/gravel	Generally consists of naturally occurring soils that have been contaminated with inorganic waste materials
Steel (packaging materials)	55-gallon (208-Liter) drums
Plastics (packaging materials)	90-millimeter polyethylene drum liner and plastic bags

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**Table C3-2  
 Minimum Training and Qualifications Requirements**

Personnel	Requirements
Radiography Operators <sup>a</sup>	Site-specific training based on waste matrix codes and waste material parameters; requalification every 2 years

<sup>a</sup> Operators are those persons responsible for the actual operation of testing equipment. QAPjPs shall include the site-specific title for this position.

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**Table C3-3  
 Testing Batch Data Report Contents**

Required Information	Radiography	Visual Examination	Comment
Batch Data Report Date	X	X	
Batch number	X	X	
Waste container number	X	X	
Waste stream name and/or number	O	O	
Waste Matrix Code	X	X	Summary Category Group included in waste matrix code
Implementing procedure (specific version used)	X	X	If procedure cited contains more than one method, the method used must also be cited. Can use revision number, date, or other means to track specific version used.
Container type	O	O	Drums, Standard Waste Box, Ten Drum Overpack, etc.
Video media reference	X	X	Reference to Video media applicable to each container. For visual examination of newly generated waste, video media not required if two trained operators review the contents of the waste container to ensure correct reporting.
Imaging check	O		
Camera check		O	
Audio check	O	O	
QC documentation	X	X	
Verification that the physical form matches the waste stream description and Waste Matrix Code.	X	X	Summary Category Group included in waste matrix code
Comments	X	X	
Reference to or copy of associated NCRs, if any	X	X	Copies of associated NCRs must be available.
Verify absence of prohibited items	X	X	
Operator signature and date of test	X	X	Signatures of both operators required for Visual Verification of <b>Acceptable KnowledgeAK</b>
Data review checklists	X	X	<del>All data</del> Data review checklists will be identified

LEGEND:

X - Required in batch data report.

O - Information must be documented and traceable; inclusion in batch data report is optional.

3

**ATTACHMENT C4**

**TRU MIXED WASTE CHARACTERIZATION USING  
ACCEPTABLE KNOWLEDGE**

## ATTACHMENT C4

### TRU MIXED WASTE CHARACTERIZATION USING ACCEPTABLE KNOWLEDGE

#### TABLE OF CONTENTS

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<b>Figure</b>	<b>Title</b>
Figure C4-1	Compilation of Acceptable Knowledge Documentation
Figure C4-2	Acceptable Knowledge Auditing

## ATTACHMENT C4

### TRU MIXED WASTE CHARACTERIZATION USING ACCEPTABLE KNOWLEDGE

#### C4-1 Introduction

The Resource Conservation and Recovery Act (RCRA) regulations codified in Title 40 of the Code of Federal Regulations (CFR) Parts 260 through 265, 268, and 270, and the New Mexico Hazardous Waste Management Regulations in 20.4.1 New Mexico Administrative Code (NMAC) Subparts 100 through 600, Subpart 800, and Subpart 900, authorize the use of acceptable knowledge (AK) in appropriate circumstances by waste generators, or treatment, storage, or disposal facilities to characterize hazardous waste. ~~Acceptable knowledge~~The AK is described in *Waste Analysis: EPA Guidance Manual for Facilities That Generate, Treat, Store and Dispose of Hazardous Waste* (EPA, 1994). ~~Acceptable knowledge~~The AK, as an alternative to sampling and analysis, can be used to meet all or part of the waste characterization requirements under the RCRA (EPA, 1994).

The Environmental Protection Agency's (EPA's) 1994 ~~Waste Analysis~~ Guidance Manual broadly defines the term "acceptable knowledge" to include process knowledge, whereby detailed information on the wastes is obtained from existing published or documented waste analysis data or studies conducted on hazardous waste generated by processes similar to that which generated the waste; facility records of analysis performed before the effective date of RCRA; and waste analysis data obtained from generators of similar wastes that send their wastes off-site for treatment, storage, or disposal (EPA, 1994). If a generator/storage site determines that AK alone is insufficient to accurately characterize a waste, the site may use radiography and/or visual examination (VE) (specified in Permit Attachment C1) to complete the waste characterization process and satisfy the requirements of the Waste Analysis Plan (WAP) specified in Permit Attachment C. ~~Acceptable knowledge~~The AK is used in transuranic (TRU) mixed waste characterization activities in five ways:

- To delineate TRU mixed waste streams
- To assess whether TRU mixed wastes comply with the applicable requirements of the Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (**TSDF-WAC**)
- To assess whether TRU mixed wastes exhibit a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR §Part 261, Subpart C)
- To assess whether TRU mixed wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR §Part 261, Subpart D)
- To estimate waste material parameter weights

Radiography and/or VE may be performed to augment the characterization of wastes based on ~~acceptable knowledge~~AK when an AK Sufficiency Determination has not been requested by the generator/storage site or, if requested, has not been granted by the U.S. Department of Energy (DOE) (see Section C4-3d). ~~TRU~~Transuranic mixed waste streams shall undergo applicable

1 provisions of the ~~acceptable knowledge~~AK process prior to management, storage, or disposal  
2 by the Permittees at the WIPP facility.

### 3 C4-2 Acceptable Knowledge Documentation

4 The Permittees shall obtain from each DOE TRU mixed waste generator/storage site (**site**) a  
5 logical sequence of ~~acceptable knowledge~~AK information that progresses from general facility  
6 information (TRU Mixed Waste Management Program Information) to more detailed waste-  
7 specific information (TRU Mixed Waste Stream Information). Traceability of ~~acceptable~~  
8 ~~knowledge~~AK information for a selected container in the audited Waste Summary Category  
9 Group(s) will be examined during DOE's audit of a site (Section C4-3g). The consistent  
10 presentation of ~~acceptable knowledge~~AK documentation among sites in auditable records<sup>1</sup> will  
11 allow DOE to verify the completeness and adequacy of ~~acceptable knowledge~~AK for TRU mixed  
12 waste characterization during the audit process. The Permittees shall require sites to implement  
13 the ~~acceptable knowledge~~AK process as specified in this Permit to characterize TRU mixed  
14 wastes and obtain sufficient waste characterization data to demonstrate compliance with the  
15 Permit. The New Mexico Environment Department (**NMED**) may independently validate the  
16 implementation of and compliance with applicable provisions of the WAP at each  
17 generator/storage site by participation in the Audit and Surveillance Program (Permit  
18 Attachment C6). The DOE shall provide the NMED with current audit schedules and notify  
19 NMED in writing no later than thirty (30) calendar days prior to each audit. The NMED may  
20 choose to accompany DOE on any audit of the WAP implementation.

21 The following sections include the information the Permittees will require for each site to  
22 characterize TRU mixed waste using ~~acceptable knowledge~~AK. Because waste generating  
23 processes are site-specific, sites shall, as necessary, augment the required ~~acceptable~~  
24 ~~knowledge~~AK records with additional supporting information (see Section C4-2c, Additional  
25 Acceptable Knowledge Information). If the required information is not available for a particular  
26 waste stream, the waste stream will not be eligible for an AK Sufficiency Determination as  
27 specified in Section C4-3d.

#### 28 C4-2a Required TRU Mixed Waste Management Program Information

29 ~~TRU~~Transuranic mixed waste management program information shall clearly define waste  
30 categorization schemes and terminology, provide a breakdown of the types and quantities of  
31 TRU mixed waste that are generated and stored at the site, and describe how waste is tracked  
32 and managed at the site, including historical and current operations. Information related to TRU  
33 mixed waste certification procedures and the types of documentation (e.g., waste profile forms)  
34 used to summarize ~~acceptable knowledge~~AK shall also be provided. The following information  
35 shall be included as part of the ~~acceptable knowledge~~AK written record:

- 36 • Map of the site with the areas and facilities involved in TRU mixed waste generation,  
37 treatment, and storage identified

---

<sup>1</sup> "Auditable records" mean those records which allow the Permittees to conduct a systematic assessment, analysis, and evaluation of the Permittees compliance with the WAP and this Permit.

- 1 • Facility mission description as related to TRU mixed waste generation and  
2 management (e.g., nuclear weapons research may involve metallurgy, radiochemistry,  
3 and nuclear physics operations that result in specific waste streams)
- 4 • Description of the operations that generate TRU mixed waste at the site (e.g.,  
5 plutonium recovery, weapons design, or weapons fabrication)
- 6 • Waste identification or categorization schemes used at the facility (e.g., item  
7 description codes, content codes)
- 8 • Types and quantities of TRU mixed waste generated, including historical generation  
9 through future projections
- 10 • Correlation of waste streams generated from the same building and process, as  
11 appropriate (e.g., sludge, combustibles, metals, and glass)
- 12 • Waste certification procedures for retrievably stored and newly generated wastes to be  
13 sent to the WIPP facility

#### 14 C4-2b Required TRU Mixed Waste Stream Information

15 Sites may use ~~acceptable knowledge~~AK to delineate site-specific waste streams. For each TRU  
16 mixed waste stream, the Permittees shall require sites to compile ~~all the~~ process information  
17 and data that support the ~~acceptable knowledge~~AK used to characterize that waste stream. The  
18 type and quantity of supporting documentation will vary by waste stream, depending on the  
19 process generating the waste and site-specific requirements imposed by the Permittees. At a  
20 minimum, the waste process information shall include the following written information:

- 21 • Area(s) and/or building(s) from which the waste stream was or is generated
- 22 • Waste stream volume and time period of generation (e.g., 100 standard waste boxes  
23 of retrievable stored waste generated from June 1977 through December 1977)
- 24 • Waste generating process described for each building (e.g., batch waste stream  
25 generated during decommissioning operations of glove boxes), including processes  
26 associated with U134 ~~hydrofluoric acid~~HF waste generation, if applicable.
- 27 • Documentation regarding how the site has historically managed the waste, including  
28 the historical regulatory status of the waste (i.e., TRU mixed versus TRU non-mixed  
29 waste)
- 30 • Process flow diagrams (e.g., a diagram illustrating glove boxes from a specific building  
31 to a size reduction facility to a container storage area); ~~in~~in the case of  
32 research/development, analytical laboratory waste, or other similar processes where  
33 process flow diagrams cannot be created, a description of the waste generating  
34 processes, rather than a formal process flow diagram, may be included if this  
35 modification is justified and the justification is placed in the auditable record



- 1 • Material inputs or other information that identifies the chemical content of the waste  
2 stream and the physical waste form (e.g., glove box materials and chemicals handled  
3 during glove box operations; events or processes that may have modified the chemical  
4 or physical properties of the waste stream after generation; data obtained through  
5 ~~visual examination (VE)~~ of newly generated waste that later undergoes radiography;  
6 information demonstrating neutralization of U134 ~~[hydrofluoric acid]~~ and waste  
7 compatibility)

8 The ~~acceptable knowledge~~AK written record shall include a summary that identifies ~~all the~~  
9 sources of waste characterization information used to delineate the waste stream. The basis  
10 and rationale for delineating each waste stream, based on the parameters of interest, shall be  
11 clearly summarized and traceable to referenced documents. Assumptions made in delineating  
12 each waste stream also shall be identified and justified. If discrepancies exist between required  
13 information, then sites may consider applying ~~all the~~ EPA hazardous waste numbers indicated  
14 by the information to the subject waste stream, but must assess and evaluate the information to  
15 determine the appropriate EPA hazardous waste numbers consistent with RCRA requirements.  
16 The Permittees shall obtain from each site, at a minimum, procedures that comply with the  
17 following ~~acceptable knowledge~~AK requirements:

- 18 • Procedures for identifying and assigning the physical waste form of the waste
- 19 • Procedures for delineating waste streams and assigning Waste Matrix Codes
- 20 • Procedures for resolving inconsistencies in ~~acceptable knowledge~~AK documentation
- 21 • Procedures for ~~visual examination~~VE and/or radiography, if applicable
- 22 • For newly generated waste, procedures describing process controls used to ensure  
23 prohibited items (specified in the WAP, Permit Attachment C) are documented and  
24 managed
- 25 • Procedures to ensure radiography and ~~visual examination~~VE include a list of  
26 prohibited items that the operator shall verify are not present in each container (e.g.,  
27 liquid exceeding TSDF-WAC limits, corrosives, ignitables, reactives, and incompatible  
28 wastes)
- 29 • Procedures to document how changes to Waste Matrix Codes, waste stream  
30 assignment, and associated ~~Environmental Protection Agency (EPA)~~EPA hazardous  
31 waste numbers based on material composition are documented for any waste
- 32 • Procedures that ensure the assignment of EPA hazardous waste numbers is  
33 appropriate, consistent with RCRA requirements, and considers site historical waste  
34 management
- 35 • Procedures for estimating waste material parameter weights

1 C4-2c Additional Acceptable Knowledge Information

2 The generator/storage sites shall obtain additional ~~acceptable knowledge~~AK information. Sites  
3 shall collect information as appropriate to augment required information and provide any other  
4 information obtained to further delineate waste streams. Adequacy of this information shall be  
5 assessed by DOE during audits (Section C4-3g). Sites will use this information to compile the  
6 ~~acceptable knowledge~~AK written record.

7 ~~All additional~~Additional specific, relevant ~~acceptable knowledge~~AK documentation assembled  
8 and used in the ~~acceptable knowledge~~AK process, whether it supports or contradicts any  
9 required ~~acceptable knowledge~~AK documentation, shall be identified and an explanation  
10 provided for its use (e.g., identification of a toxicity characteristic). Additional documentation  
11 may be used to further document the rationale for the hazardous characterization results. The  
12 collection and use of additional information shall be assessed by DOE during site audits to  
13 ensure that hazardous waste characterization is supported, as necessary, by such information.  
14 Similar to required information, if discrepancies exist between additional information and the  
15 required information, then sites may consider applying ~~all the~~ EPA hazardous waste numbers  
16 indicated by the additional information to the subject waste stream, but must assess and  
17 evaluate the information to determine the appropriate EPA hazardous waste numbers  
18 consistent with RCRA requirements. ~~All~~The information considered must be documented and  
19 placed in the auditable record, including applicable discrepancy resolution documentation.

20 Additional ~~acceptable knowledge~~AK documentation includes, but is not limited to, the following  
21 information:

- 22 • Process design documents (e.g., Title II Design)
- 23 • Standard operating procedures that may include a list of raw materials or reagents, a  
24 description of the process or experiment generating the waste, and a description of  
25 wastes generated and how the wastes are managed at the point of generation
- 26 • Preliminary and final safety analysis reports and technical safety requirements
- 27 • Waste packaging records
- 28 • Test plans or research project reports that describe reagents and other raw materials  
29 used in experiments
- 30 • Site databases (e.g., chemical inventory database for Superfund Amendments and  
31 Reauthorization Act Title III requirements)
- 32 • Information from site personnel (e.g., documented interviews)
- 33 • Standard industry documents (e.g., vendor information)
- 34 • Analytical data relevant to the waste stream, including results from fingerprint  
35 analyses, spot checks, routine verification sampling, or other processes that collect  
36 information pertinent to the waste stream; ~~This~~this may also include new information

1 which augments required information (e.g., ~~visual examination~~VE not performed in  
2 compliance with the WAP, radiography screening for prohibited items)

- 3 • Material Safety Data Sheets/Safety Data Sheets, product labels, or other product  
4 package information
- 5 • Sampling and analysis data from comparable or surrogate waste streams (e.g.,  
6 equivalent nonradioactive materials)
- 7 • Laboratory notebooks that detail the research processes and raw materials used in an  
8 experiment

### 9 C4-3 Acceptable Knowledge Training, Procedures and Other Requirements

10 The Permittees shall require consistency among sites in using ~~acceptable knowledge~~AK  
11 information to characterize TRU mixed waste by the use of the following: 1) compiling the  
12 required and additional ~~acceptable knowledge~~AK documentation in an auditable record, 2)  
13 auditing ~~acceptable knowledge~~AK records, and 3) Waste Stream Profile Form (WSPF) approval  
14 and waste confirmation. This section specifies qualification and training requirements, describes  
15 each phase of the process, specifies the procedures that the Permittees shall require ~~all~~ sites to  
16 develop to implement the requirements for using ~~acceptable knowledge~~AK, and specifies data  
17 quality requirements for ~~acceptable knowledge~~AK.

#### 18 C4-3a Qualifications and Training Requirements

19 Site personnel responsible for compiling ~~acceptable knowledge~~AK, assessing ~~acceptable~~  
20 ~~knowledge~~AK, and resolving discrepancies associated with ~~acceptable knowledge~~AK shall be  
21 qualified and trained in the following areas at a minimum:

- 22 • WIPP WAP in Permit Attachment C, Waste Analysis Plan, and the TSDF-WAC  
23 specified in this permit
- 24 • State and Federal RCRA regulations associated with solid and hazardous waste  
25 characterization
- 26 • Discrepancy resolution and reporting processes
- 27 • Site-specific procedures associated with waste characterization using ~~acceptable~~  
28 ~~knowledge~~AK

#### 29 C4-3b Acceptable Knowledge Assembly and Compilation

30 The Permittees shall obtain from sites ~~acceptable knowledge~~AK procedures which require  
31 consistent application of the ~~acceptable knowledge~~AK process and requirements. Site-specific  
32 ~~acceptable knowledge~~AK procedures shall address the following:

- 33 • Sites shall prepare and implement a written procedure outlining the specific  
34 methodology used to assemble ~~acceptable knowledge~~AK records, including the origin  
35 of the documentation, how it will be used, and any limitations associated with the

1 information (e.g., identify the purpose and scope of a study that included limited  
2 sampling and analysis data).

- 3 • Sites shall develop and implement a written procedure to compile the required  
4 ~~acceptable knowledge~~AK record.
- 5 • Sites shall develop and implement a written procedure that ensures unacceptable  
6 wastes (e.g., reactive, ignitable, corrosive) are identified and segregated from TRU  
7 mixed waste populations sent to the WIPP facility.
- 8 • Sites shall prepare and implement a written procedure to evaluate ~~acceptable~~  
9 ~~knowledge~~AK and resolve discrepancies. For example, if different sources of  
10 information indicate different hazardous wastes are present, then sites shall include  
11 ~~the~~all sources of information in its records and may choose to either conservatively  
12 assign EPA hazardous waste numbers or assign only those numbers deemed  
13 appropriate and consistent with RCRA requirements. ~~All information~~Information used  
14 to justify assignment of EPA hazardous waste numbers must be placed in the  
15 auditable record. Further, the assignment of EPA hazardous waste numbers shall be  
16 tracked in the auditable record to ~~all~~the required documentation.
- 17 • Sites shall prepare and implement a written procedure to identify hazardous wastes  
18 and assign the appropriate EPA hazardous waste numbers to each waste stream. The  
19 following are minimum baseline requirements/standards that site-specific procedures  
20 shall include to ensure comparable and consistent characterization of hazardous  
21 waste:
  - 22 – Compile ~~all of~~ the required information in an auditable record.
  - 23 – Review the compiled information and delineate waste streams. Delineation of  
24 waste streams must comply with the definition in Permit Attachment C, Section C-  
25 0a, and justify combining waste historically managed separately as TRU mixed and  
26 TRU non-mixed waste streams into a single waste stream.
  - 27 – Review the compiled information to determine if the waste stream is compliant with  
28 the TSDF-WAC.
  - 29 – Review the required information to determine if the waste is listed under 20.4.1.200  
30 NMAC (incorporating 40 CFR §Part 261), Subpart D. Assign ~~all~~the listed EPA  
31 hazardous waste numbers unless the sites choose to justify an alternative  
32 assignment and document the justification in the auditable record.
  - 33 – Review the required information to determine if the waste exhibits a hazardous  
34 characteristic or may contain hazardous constituents included in the toxicity  
35 characteristics specified in 20.4.1.200 NMAC (incorporating 40 CFR §Part 261),  
36 Subpart C. If a toxicity characteristic contaminant is identified and is not included  
37 as a listed waste, sites may evaluate available data and assign the toxicity  
38 characteristic EPA hazardous waste number consistent with RCRA requirements.  
39 ~~All data~~Data examined to reach the EPA hazardous waste number determination  
40 must be placed in the auditable record and must present a clear justification for the  
41 EPA hazardous waste number analyses.

- 1           – Review the compiled information to provide an estimate of material parameter  
2           weights for each container to be stored or disposed of at the WIPP facility.

3           For newly generated wastes, procedures shall be developed and implemented to  
4           characterize hazardous waste using acceptable knowledgeAK prior to packaging the  
5           waste.

- 6           • Sites shall ensure that results of audits of the site's TRU mixed waste characterization  
7           programs ~~at the site~~ are available in the records.
- 8           • Sites shall identify ~~the all~~ process controls (implemented to ensure that the waste  
9           contains no prohibited items and to control hazardous waste content and/or physical  
10          form) that may have been applied to retrievably stored waste and/or may presently be  
11          applied to newly generated waste. Process controls are applied at the time of waste  
12          generation/packaging to control waste content, whereas any activities performed after  
13          waste generation/packaging to identify prohibited items, hazardous waste content, or  
14          physical form are waste characterization activities, not process controls. The AK  
15          record must contain specific process controls and supporting documentation  
16          identifying when these process controls are used to control waste content. See Permit  
17          Attachment C, Section C-2 for programmatic requirements related to process controls.
- 18          • Chemical compatibility will be evaluated pursuant to Permit Part 2, Section 2.3.3.4 (as  
19          applicable), on a waste stream basis based on guidance provided in the 1980 EPA  
20          method, EPA 600/2-80-076. The evaluation will be documented (e.g., in a chemical  
21          compatibility evaluation memorandum).

22 C4-3c      Criteria for Assembling an Acceptable Knowledge Record and Delineating the Waste  
23             Stream

24           Figure C4-1 provides an overview of the process for assembling acceptable knowledgeAK  
25           documentation into an auditable record. The first step is to assemble all of the required  
26           acceptable knowledgeAK information and any additional information regarding the materials and  
27           processes that generate a specific waste stream. The Permittees shall require the sites to  
28           implement procedures which comply with the following criteria to establish acceptable  
29           knowledgeAK records:

- 30           • Acceptable knowledge information shall be compiled in an auditable record, including  
31           a road map for all the applicable information.
- 32           • The overview of the facility and TRU mixed waste management operations in the  
33           context of the facility's mission shall be correlated to specific waste stream information.
- 34           • Correlations between waste streams, with regard to time of generation, waste  
35           generating processes, and site-specific facilities shall be clearly described. For newly  
36           generated wastes, the rate and quantity of waste to be generated shall be defined.
- 37           • A reference list shall be provided that identifies documents, databases, Quality  
38           Assurance protocols, and other sources of information that support the acceptable  
39           knowledgeAK information.

1 Container inventories for TRU mixed waste currently in retrievable storage shall be delineated  
2 into waste streams by correlating the container identification to ~~all of~~ the required ~~acceptable~~  
3 ~~knowledge~~AK information and any additional ~~acceptable knowledge~~AK information.

4 C4-3d AK Sufficiency Determination Request Contents

5 Generator/storage sites may submit an AK Sufficiency Determination Request (**Determination**  
6 **Request**) to meet all or part of the waste characterization requirements. The Determination  
7 Request shall include, at a minimum:

- 8 • A complete AK Summary that addresses the following technical requirements:
- 9 – Executive Summary;
  - 10 – Waste Stream Identification Summary, including a demonstration that the waste  
11 stream has been properly delineated and meets the Permit definition of waste  
12 stream (Permit Attachment C, *Introduction*);
  - 13 – Mandatory Program Information (including, but not limited to, facility location and  
14 description, mission, defense waste assessment, spent nuclear fuel and high-level  
15 waste assessment, description of waste generating processes,  
16 research/development [as necessary], facility support operations [as applicable],  
17 types and quantities of TRU waste generated, correlation of waste streams to  
18 buildings/processes, waste identification and categorization, physical form  
19 identifiers);
  - 20 – Mandatory Waste Stream Information (including, but not limited to, Area and  
21 Building of Generation, waste stream volume/period of generation (including, for  
22 newly generated waste, the rate and quantity of waste to be generated), waste  
23 generating activities, types of waste generated, material input related to physical  
24 form and identification of percentage of each waste material parameter in the  
25 waste stream, chemical content information including hazardous constituents and  
26 hazardous waste identification, prohibited item content (including documented  
27 evidence that the waste meets the TSDF-WAC ~~presented in~~ Permit Part 2,  
28 Sections 2.3.3.1 through 2.3.3.10), waste packaging, presence of filter vents,  
29 number of layers of confinement);
  - 30 – Types of additional information gathered;
  - 31 – Container specific data (if available and relevant); and
  - 32 – A complete reference list including ~~all~~ mandatory and additional information.
- 33 • An AK roadmap (defined as a cross reference between mandatory programmatic and  
34 mandatory waste stream information, with references supporting these requirements).
- 35 • A complete reference list including ~~all~~ mandatory and additional documentation.



- 1 • Additional relevant information for the required programmatic and waste stream data  
2 addressed in the AK Summary, examples of which are presented in Permit Attachment  
3 C4, Section C4-2c.
- 4 • Identification of any mandatory requirements supported only by upper tier documents  
5 (i.e., there is insufficient supporting data).
- 6 • Description or other means of demonstrating that the AK process described in the  
7 Permit was followed (for example, AK personnel were appropriately trained;  
8 discrepancies were documented, ~~etc~~).
- 9 • Information showing that the generator/storage site has developed a written procedure  
10 for compiling the AK information and assigning EPA hazardous waste numbers as  
11 required in ~~Section~~Permit Attachment C4-3b.
- 12 • Information showing that the generator/storage site has assessed the AK process  
13 (e.g. internal audits, ~~Section~~Permit Attachment C4-3b).

14 The Permittees shall evaluate the Determination Request for completeness and technical  
15 adequacy as specified in Permit Attachment C.

#### 16 C4-3e Requirements for Re-evaluating Acceptable Knowledge Information

17 Acceptable knowledge includes information regarding the physical form of the waste, the base  
18 materials composing the waste, and the process that generates the waste. Waste testing (i.e.,  
19 radiography or ~~visual examination~~VE) may be used to augment ~~acceptable knowledge~~AK  
20 information.

21 The ~~Waste Stream Profile Form (WSPF)~~WSPF and Characterization Information Summary  
22 (including the ~~acceptable knowledge~~AK summary) will be reviewed by the Permittees for each  
23 waste stream prior to DOE approval of the WSPF. The Permittees' review will ensure that the  
24 submitted AK information was collected under procedures that ensure implementation of the  
25 WAP, provides data sufficient to meet the DQOs in Permit Attachment C, Section C-4a(1), and  
26 allow the Permittees to demonstrate compliance with the waste analysis requirements of the  
27 Permit. A detailed discussion of the Permittees' waste stream review and the DOE's WSPF  
28 approval process is provided in Permit Attachment C, Section C-1d.

29 The Permittees shall require sites to establish procedures for reevaluating ~~acceptable~~  
30 ~~knowledge~~AK if the results of waste confirmation indicate that the waste to be shipped does not  
31 match the approved waste stream, or if data obtained from radiography or ~~visual examination~~VE  
32 for waste streams without an AK Sufficiency Determination exhibit this discrepancy. Site  
33 procedures shall describe how the waste is reassigned, ~~acceptable knowledge~~AK reevaluated,  
34 and appropriate EPA hazardous waste numbers assigned. If the reevaluation requires that the  
35 Waste Matrix Code be changed for the waste stream or the waste does not match the approved  
36 waste stream, the following minimum steps shall be taken to reevaluate ~~acceptable~~  
37 ~~knowledge~~AK:

- 38 • Review existing information based on the container identification number and  
39 document ~~all the~~ differences in EPA hazardous waste number assignments



- 1 • If differences exist in the EPA hazardous waste numbers that were assigned, reassess  
2 and document ~~all the~~ required ~~acceptable knowledge~~AK information (Section C4-3b)  
3 associated with the new designation
  
- 4 • Reassess and document ~~all~~ testing data associated with the waste
  
- 5 • Verify and document that the reassigned Waste Matrix Code was generated within the  
6 specified time period, area and buildings, waste generating process, and that the  
7 process material inputs are consistent with the waste material parameters identified  
8 during radiography or ~~visual examination~~VE
  
- 9 • Record ~~all~~ changes to ~~acceptable knowledge~~AK records
  
- 10 • If discrepancies exist in the ~~acceptable knowledge~~AK information for the revised  
11 Waste Matrix Code, document the segregation of the affected portion of the waste  
12 stream, and define the actions necessary to fully characterize the waste

#### 13 C4-3f Acceptable Knowledge Data Quality Requirements

14 The data quality objectives for testing techniques are provided in Permit Attachment C3. Testing  
15 results will be used to augment the characterization of wastes based on ~~acceptable~~  
16 ~~knowledge~~AK. To ensure that the ~~acceptable knowledge~~AK process is consistently applied, the  
17 Permittees shall require sites to comply with the data quality requirements for ~~acceptable~~  
18 ~~knowledge~~AK documentation in Permit Attachment C3.

19 Each site shall address quality control by tracking its performance with regard to the use of  
20 ~~acceptable knowledge~~AK by: 1) assessing the frequency of inconsistencies among information,  
21 and 2) documenting the results of waste discrepancies identified by the generator/storage site  
22 during waste characterization or the Permittees during waste confirmation using radiography,  
23 review of radiography audio/video recordings, ~~visual examination~~VE, or review of ~~visual~~  
24 ~~examination~~VE records. In addition, the ~~acceptable knowledge~~AK process and waste stream  
25 documentation shall be evaluated through internal assessments by generator/storage site  
26 quality assurance organizations.

#### 27 C4-3g Audits of Acceptable Knowledge

28 The DOE will conduct an initial audit of each site prior to certifying the site for shipment of TRU  
29 mixed waste to the WIPP facility. This initial audit will establish an approved baseline that will be  
30 reassessed annually by the DOE. These audits will verify compliance with the requirements  
31 specified in the WAP (Permit Attachment C). The audits will be used to verify compliance with  
32 the compilation, application, and interpretation requirements of ~~acceptable knowledge~~AK  
33 information specified in this Permit at ~~all the~~ sites, and to evaluate the completeness and  
34 defensibility of site-specific ~~acceptable knowledge~~AK documentation related to hazardous waste  
35 characterization. Permit Attachment C6 gives a description of the overall audit program and a  
36 required checklist. Figure C4-2 includes the primary steps associated with the audit process of  
37 ~~acceptable knowledge~~AK.

38 Site-specific audit plans will be prepared by the DOE and provided to the NMED, and will  
39 identify the scope of the audit, requirements to be assessed, participating personnel, activities to  
40 be audited, organizations to be notified, applicable documents, and schedule. Audits will be

1 performed in accordance with written procedures and site-specific checklists that will be  
2 developed by the DOE prior to the audit and provided to the NMED. The site-specific audit  
3 checklists will include items associated with the compilation and evaluation of the required  
4 ~~acceptable knowledge~~AK information as specified in the checklist required by Permit  
5 Attachment C6.

6 Audit checklists shall include Permit Attachment C6, Table C6-2 ~~in Permit Attachment C6~~, and  
7 will include but not be limited to the following elements for review during the audit:

- 8 • Documentation of the process used to compile, evaluate, and record ~~acceptable~~  
9 ~~knowledge~~AK is available and implemented;
- 10 • Personnel qualifications and training are documented;
- 11 • ~~All of the~~The required ~~acceptable knowledge~~AK documentation specified in Section  
12 C4-2 has been compiled in an auditable record;
- 13 • ~~All of the~~The required procedures specified in Section C4-3 have been developed and  
14 implemented, including but not limited to:
  - 15 – A procedure exists for assigning EPA hazardous waste numbers to waste streams  
16 in accordance with Section C4-3;
  - 17 – A procedure exists for resolving discrepancies in ~~acceptable knowledge~~AK  
18 documentation in accordance with Section C4-3; and
- 19 • Results of other audits of the TRU mixed waste characterization programs at the site  
20 are available in site records.

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

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

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

1 nonconformance procedures, and oversight procedures. Auditors will evaluate compliance with  
2 written site procedures for developing the ~~acceptable knowledge~~AK record. A completeness  
3 review will evaluate the availability of ~~all~~-required TRU mixed waste management program  
4 information and TRU mixed waste stream information (Section C4-2). Records will be reviewed  
5 for correlation to specific waste streams and the basis for characterizing hazardous waste.  
6 Auditors will verify that sites include ~~all~~-required information and assigned appropriate EPA  
7 hazardous waste numbers as indicated by the ~~acceptable knowledge~~AK records and consistent  
8 with RCRA requirements. ~~All deficiencies~~Deficiencies in the ~~acceptable knowledge~~AK  
9 documentation will be included in the audit report.

10 Auditors will verify and document that sites use administrative controls and follow written  
11 procedures to characterize hazardous waste for newly-generated and retrievably stored wastes.  
12 Procedures to document changes in ~~acceptable knowledge~~AK documentation and changes to  
13 EPA hazardous waste number assignments to specific waste streams also will be evaluated for  
14 compliance with the WAP (Permit Attachment C).

15 After the audit is complete, the DOE will provide the site with preliminary results at a close-out  
16 meeting. The DOE will prepare a final audit report that includes ~~the~~all observations and findings  
17 identified during the audit. Sites shall respond to ~~all~~the audit findings and identify corrective  
18 actions. Audit results will be included in the final audit report (Permit Attachment C6). If  
19 ~~acceptable knowledge~~AK procedures do not exist, the required information is not available, or  
20 corrective actions (i.e., Corrective Action Reports (CARs)) are ~~identified~~-associated with  
21 ~~deficiencies in the acceptable knowledge~~AK compilation process (i.e., the minimum required  
22 information in Section C4-2 has not been collected and organized to present the required  
23 information on the subject waste stream(s)), and/or EPA hazardous waste number assignment  
24 is not accurate~~characterization~~, the Permittees will not manage, store, or dispose TRU mixed  
25 waste for the subject waste stream(s)-summary category. Permit Attachment C3, Section C3-7,  
26 Nonconformances, requires the responsible organization(s) to review CARs and evaluate the  
27 extent of condition. If, during the corrective action process, the extent of condition is determined  
28 to be applicable to other waste streams, the Permittees will not manage, store, or dispose of  
29 TRU mixed waste from those affected waste streams. Management, storage, or disposal of the  
30 ~~affected waste streams~~subject waste summary category at the WIPP facility will not resume  
31 until the DOE agrees~~find~~ that ~~all~~the corrective actions have been implemented and the site  
32 complies with ~~all~~the applicable requirements of the WAP.

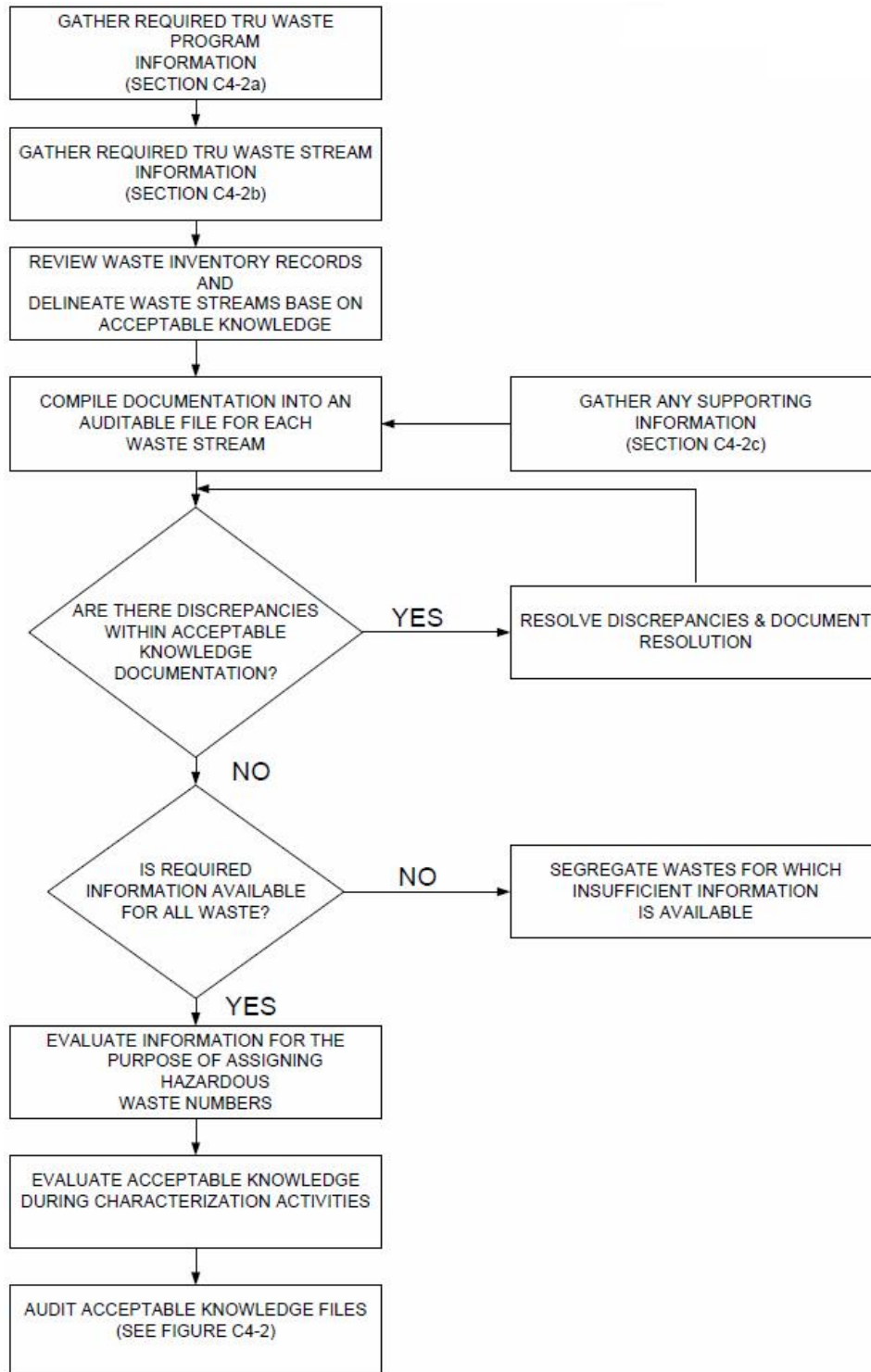
33 The DOE disseminates information regarding TRU mixed waste characterization requirements  
34 and program status through the WIPP Home Page. The Permittees will use this web page to  
35 disseminate information regarding TRU mixed waste streams, RCRA compliance, and  
36 operational and programmatic issues, methods development, and waste characterization  
37 information, including the application of ~~acceptable knowledge~~AK. The DOE is provided the  
38 required waste characterization information prior to management, storage, or disposal of that  
39 waste at WIPP and also will conduct audits at least annually. The Permittees will maintain an  
40 ~~operating record~~Operating Record for review during regulatory agency audits. The NMED may  
41 also review any information relevant to the scope of the audit during site audits. The DOE will  
42 notify the NMED regarding any site's failure to implement corrective actions associated with  
43 hazardous waste characterization as specified in Permit Parts 1 and 2 and Permit Attachment  
44 C3.

45

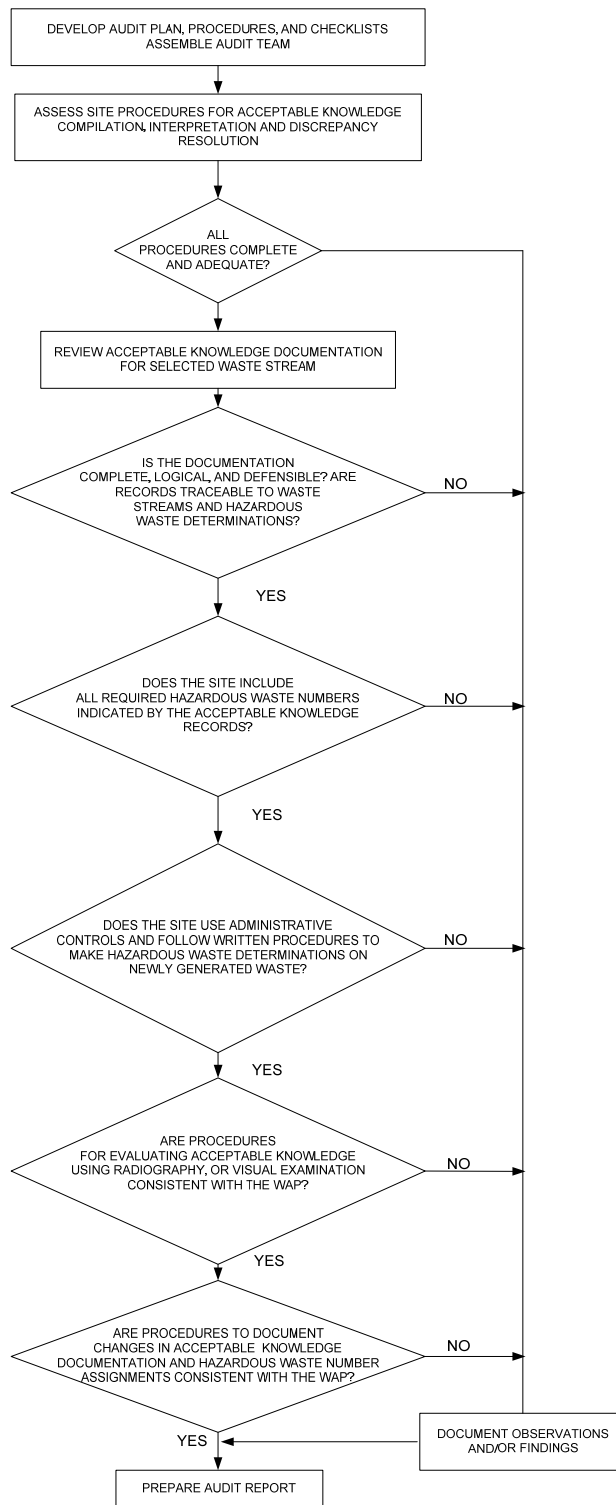
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## FIGURES



**Figure C4-1**  
**Compilation of Acceptable Knowledge Documentation**



**Figure C4-2**  
**Acceptable Knowledge Auditing**

**ATTACHMENT C5**  
**QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS**



**ATTACHMENT C5**

**QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS**

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## ATTACHMENT C5

### QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

#### C5-1 Quality Assurance Project Plans

Prior to management, storage, or disposal of a generator/storage site's transuranic (TRU) mixed waste at the Waste Isolation Pilot Plant (WIPP) facility~~WIPP~~, the Permittees shall require that each participating site develops and implements a quality assurance project plan (QAPjP) that addresses ~~all~~ the applicable requirements specified in ~~Waste Isolation Pilot Plant~~the waste analysis plan (WAP) in Permit Attachment C. The U.S. Department of Energy (DOE) will approve QAPjPs from ~~all~~ the generator/storage sites that intend to send TRU mixed waste to the ~~WIPP facility~~Waste Isolation Pilot Plant. The DOE shall ensure that these QAPjPs include the qualitative or quantitative criteria for determining whether waste characterization program activities are being satisfactorily performed. The DOE shall also ensure that QAPjPs identify the organization(s) and position(s) responsible for their implementation. Additionally, the QAPjPs shall also reference site-specific documentation that details how each of the required elements of the characterization program will be performed.

The DOE shall ensure that prior to the implementation of characterization activities at participating sites, standard operating procedures (SOPs) were developed for ~~all~~the activities which affect the quality of the waste characterization program elements specified in the WAP. For the purposes of the quality assurance (QA) program, the term SOP refers to any site-specific implementing document. Compliance with SOPs will ensure that tasks are performed in a consistent manner that results in achieving the quality required for the ~~QA~~quality assurance program. The organization, format, content, and designation of SOPs shall be described in the QAPjPs. Site-specific SOPs will be reviewed for consistency with the QAPjP according to the Audit and Surveillance Program specified in Permit Attachment C6.

#### C5-2 Document Review, Approval, and Control

The DOE shall ensure that the preparation, issuance, and change to documents that specify quality requirements or prescribe activities affecting quality for the ~~transuranic~~ TRU mixed waste characterization program elements specified in the WAP be controlled to assure that correct and current documents are used and referenced. The QAPjPs shall include a document control format consisting of a unique document identification number, current revision number, date, and page number which will be placed on the individual pages of the document. ~~All~~ Quality~~quality~~ documents for the waste characterization program shall be reviewed prior to approval and issuance by qualified and independent individuals. The QAPjP review shall consider the technical adequacy, completeness, and correctness of the QAPjP, and the inclusion of and compliance with the requirements established by the WAP (Permit Attachment C). The DOE shall ensure that appropriate QAPjP approval is indicated by a signature and date page included in the front of each document.

At a minimum, the DOE shall ensure that revisions to documents that implement the requirements of the WAP are denoted by including the current revision number on the document title page, the revised signature page, and each page that has been revised. Only revised pages need to be reissued. Changes to documents, other than those defined as editorial changes or minor changes, shall be reviewed and approved by the same functional organizations that

performed the original review and approval, unless other organizations are specifically designated in accordance with approved procedures. Editorial or minor changes may be made without the same level of review and approval as the original or otherwise changed document. The following items are considered editorial or minor changes:

- Correcting grammar or spelling (the meaning has not changed)
- Renumbering sections or attachments
- Updating organizational titles
- Changes to nonquality-affecting schedules
- Revised or reformatted forms, providing the original intent of the form has not been altered
- Attachments marked “Example,” “Sample,” or exhibits that are clearly intended to be representative only

A change in an organizational title accompanied by a change in the responsibilities is not considered an editorial change. Changes to the text shall be clearly indicated in the document. The DOE shall provide the QAPjP for each site and ~~all subsequent~~ revisions to ~~NMED~~the New Mexico Environment Department upon approval by the DOE.

The DOE shall ensure that QAPjPs include a detailed description of the reporting and approval requirements for changes to approved QA documents and SOPs, including procedures for implementing changes to these documents. ~~All members~~Members of the site project staff are responsible for reporting any obsolete or superseded information to the ~~site project manager~~Site Project Manager (SPM). ~~All site-specific~~Site-specific changes shall be evaluated and approved by the ~~site project manager~~SPM before implementation. The ~~SPM~~site project manager shall notify the appropriate personnel and the affected documents shall be revised as necessary. The site project manager shall also be responsible for notifying the DOE field office of the changes. The DOE shall ensure that changes that affect performance criteria or data quality, testing procedures, quality assurance objectives, calibration requirements, or ~~QC~~quality control sample acceptance criteria comply with the WAP ~~(Permit Attachment C)~~ and shall not be made without prior approval of the DOE.

**ATTACHMENT C6**  
**AUDIT AND SURVEILLANCE PROGRAM**

**ATTACHMENT C6**  
**AUDIT AND SURVEILLANCE PROGRAM**

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<b>Table</b>	<b>Title</b>
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Table C6-2	Acceptable Knowledge (AK) Checklist
Table C6-3	Radiography Checklist
Table C6-4	Visual Examination (VE) Checklist

## ATTACHMENT C6

### AUDIT AND SURVEILLANCE PROGRAM

#### C6-1 Introduction

The Waste Isolation Pilot Plant (**WIPP**) Audit and Surveillance Program shall ensure that: 1) the operators of each generator/storage site (**site**) that plan to transport transuranic (**TRU**) mixed waste to the WIPP facility conduct testing of wastes in accordance with the current WIPP Waste Analysis Plan (**WAP**) (Permit Attachment C), and 2) the information supplied by each site to satisfy the waste screening and acceptability requirements of Permit Attachment C, Section C-4 of the WAP is being managed properly. The U.S. Department of Energy (DOE) will conduct these audits and surveillances at each site performing these activities in accordance with a standard operating procedure (**SOP**). The New Mexico Environment Department (NMED) personnel may observe these audits and surveillances to validate the implementation of WAP requirements (~~Permit Attachment C~~) at each site. As specified in Permit Part 2, Section 2.3.2.2, the NMED will be invited to the daily audit team caucus as observers. Only personnel with appropriate DOE U.S. Department of Energy clearances will have access to classified information during audits. Classified information will not be included in audit reports and records. The audit SOP will contain steps for selecting audit personnel, reviewing applicable background information, preparing an audit plan, preparing audit checklists, conducting the audit, developing an audit report, and following up audit deficiencies. A deficiency is any failure to comply with an applicable provision of the WAP. The checklists for each site shall include, at a minimum, the appropriate checklists found in Tables C6-1 through C6-4 for the summary category groups undergoing audit.

#### C6-2 Audit Procedures

Audit procedures shall establish the responsibilities and methodology for planning, scheduling, performing, reporting, verifying, and closing announced and unannounced audits of sites. Records of **all**-audit activities shall be part of the WIPP Operating Record and maintained at the WIPP facility until closure. The NMED shall be provided unlimited access to these records.

Approved ~~procedures~~SOPs shall be used to describe audit activities and requirements. These SOPs~~Procedures~~ define the responsibilities of specific positions necessary to manage this audit program. The DOE manager who oversees the audit program shall ensure that the following tasks are performed:

- Schedule audits
- Designate lead auditor(s)
- Appoint auditor and lead auditor trainees
- Maintain auditor training and qualification records
- Assure that **all**-auditors have been given appropriate training, including training on the WAP



- 1 • Assign auditors and lead auditors to perform annual certification audits
- 2 • Review and approve final audit reports
- 3 • Oversee tracking and closure of all-deficiencies and any observations requiring action
- 4 • Assure records are entered into the WIPP Operating Record and are properly
- 5 maintained until facility closure

### 6 C6-3 Audit Position Functions

7 The DOE will approve lead auditors, auditors, and technical specialists based upon the  
8 expertise required for the functions being examined according to the audit scope. The DOE will  
9 supply auditors/technical specialists with expertise in the Resource Conservation and Recovery  
10 Act (**RCRA**) requirements and knowledge of the testing and documentation methods required to  
11 verify the hazardous waste characterization performed by the sites. The DOE shall identify all  
12 audit team members to the NMED prior to the audit, and shall provide upon request the  
13 qualifications of all-audit team members.

14 The lead auditor assigned to be the audit team leader must perform the following tasks:

- 15 • Concur that assigned auditors and technical specialists have the collective experience
- 16 and training commensurate with the scope, complexity, or special nature of the
- 17 activities to be audited
- 18 • Develop an audit plan and coordinate the preparation of an overall checklist to cover
- 19 the scope of the audit, with consideration given to all-nonconformances reported as
- 20 specified in Permit Attachment C3 and to previous audit results from that site
- 21 • Assign specific audit areas to individual auditors and technical specialists within their
- 22 particular specialty and provide guidance on checklist development
- 23 • Review individual auditor checklists to assure complete coverage of assigned scope,
- 24 and approve the checklists
- 25 • Conduct the audit at the site
- 26 • Encourage observers to participate according to the protocol established by the DOE
- 27 • Communicate audit results at the conclusion of the audit, including any deficiencies
- 28 and observations
- 29 • Prepare and sign the audit report
- 30 • Maintain complete records of each audit and transfer them to the DOE manager when
- 31 the audit report is issued

32 Auditors and technical specialists assigned to the specific audit will report to the audit team  
33 leader for supervision and may perform the following tasks:

- 1 • Attend any required specific training and team orientation and planning meetings as  
2 directed by the audit team leader
- 3 • Prepare specific audit checklists to verify that the WAP Quality Assurance Objectives  
4 (QAQAOs) are met for the areas being audited
- 5 • Obtain audit team leader approval of checklist
- 6 • Review acceptable knowledge (AK) documentation packages, test report data, and  
7 documentation of data verification activities
- 8 • Obtain and evaluate objective evidence by means of observation, document reviews,  
9 or the conduct of interviews with operators, technicians, and others necessary to  
10 determine the adequacy and effective implementation of the WAP
- 11 • Conduct inspection tours of waste generating stations, waste testing facilities,  
12 calibration facilities, administrative, and document control/record facility
- 13 • Complete checklist during the audit indicating the objective evidence observed verifies  
14 that the site has met the QAOs for the program elements, methods, and the activities  
15 being audited; ~~Add-add~~ other items to the checklist as they are observed or as needed  
16 during the audit
- 17 • Prepare narrative statements that clearly and concisely identify the conditions involved  
18 regarding for all deficiencies; and observations ~~that clearly and concisely identify the~~  
19 conditions involved
- 20
- 21 • Prepare any portion of the final audit report assigned by the lead auditor.

22 Audits will be conducted at least annually for each site involved in the waste characterization  
23 program. Both announced and unannounced audits will address the following:

- 24 • Results of previous audits
- 25 • Changes in programs or operations
- 26 • New programs or activities being implemented
- 27 • Changes in key personnel

28 Annual certification~~Certification~~ audits shall address contact-handled (**CH**) and remote-handled  
29 (**RH**) waste characterization activities if the site has approval or is seeking approval for such  
30 wastes. At a minimum, the audit shall evaluate ~~acceptable knowledge~~AK documentation for CH  
31 and RH waste separately by Summary Category Group, as applicable.

#### 32 C6-4 Audit Conduct

33 The conduct of the audit shall commence with an entrance meeting, conducted by the audit  
34 team leader, with site management. At this meeting, the audit objectives and scope, the specific  
35 areas to be audited, the processes or functions to be observed, and the site participation  
36 required, including site interfaces, will be identified. The purpose of this meeting is to confirm the  
37 audit scope, discuss the audit sequence, establish channels of communication, and confirm the

1 daily and exit meeting. Audits shall be performed using approved audit checklists that include  
2 the checklists in Tables C6-1 to C6-4 for the summary category groups undergoing audit.  
3 Consistency of evaluation shall be ensured before the audit through site QAPJP approval (see  
4 Permit Attachment C5). The QAPJPs for each site shall incorporate the same requirements from  
5 the WAP. Objective evidence shall be examined (to the depth necessary) to determine if the  
6 identified activities, procedures, or QAOs are adequate and are being effectively implemented.

7 Audits may not include all waste summary category groups, and thus some audit checklists or  
8 portions of checklists (Tables C6-1 through C6-4) may not be applicable to some sites (e.g.,  
9 approved ~~acceptable knowledge~~AK sufficiency determination request for one or more waste  
10 streams at a site). In these instances, DOE shall indicate ~~non-applicability~~nonapplicability in the  
11 appropriate checklist row, and justify the exclusion under the "Comment" column. In addition, in  
12 cases where discrepancies exist between the audit checklists in Tables C6-1 through C6-4 and  
13 the Permit, Permit requirements take precedence. The DOE may add to the checklists as  
14 necessary to clarify Permit requirements, but any additions will be clearly designated on the  
15 checklists (i.e., redline the additions).

16 Audits shall include site personnel interviews, document and record reviews, observations of  
17 operations, and any other activities deemed necessary by the auditors to meet the objectives of  
18 the audit. Observations or deficiencies identified during the audit will be investigated or  
19 evaluated, as necessary, to determine if they are isolated conditions or represent a general  
20 breakdown of the waste characterization quality assurance program. During audit interviews or  
21 audit meetings, site personnel may be advised of deficiencies identified within their areas of  
22 responsibility to establish a clear understanding of the identified condition.

23 The site personnel will be given the opportunity to correct any deficiency that can be corrected  
24 during the audit period. Deficiencies and observations will be documented and included as part  
25 of the final audit report. Those items that have been resolved during the audit (isolated  
26 deficiencies that do not require a root cause determination or actions to preclude recurrence),  
27 will be verified prior to the end of the audit, and the resolution will be described in the audit  
28 report. Those items that affect the quality of the program, and/or the data generated by that  
29 program, which are required by the WAP will be documented on a Corrective Action Report  
30 (**CAR**) and included as a part of the final audit report. The CAR will be entered into the DOE's  
31 CAR tracking system and tracked until closure. Resource Conservation and Recovery Act  
32 ~~RCRA~~-related items will be uniquely identified within the CAR tracking system so that they can  
33 be tracked separately. Resource Conservation and Recovery Act ~~RCRA~~-related CARs identified  
34 by the site during self-audits will be evaluated during the DOE's audit and surveillance program  
35 and tracked in the DOE's CAR tracking ~~systems~~systems.

36 When a deficiency is identified by the audit team, the audit team member who identified the  
37 deficiency prepares the CAR. The DOE reviews the CAR, determine validity (assures that a  
38 requirement has in fact been violated), classify the significance of the deficiency, assign a  
39 response due date, and issue the CAR to the site. The site reviews the CAR, evaluates the  
40 extent and cause of the deficiency, and provides a response to the DOE indicating the remedial  
41 actions and actions taken to preclude recurrence. The DOE reviews the response from the site  
42 and, if acceptable, communicate the acceptance to the site. The site completes remedial actions  
43 and actions to preclude recurrence. After ~~all~~ corrective actions have been completed, DOE may  
44 schedule and perform a verification visit to assure that corrective actions have been completed  
45 and are effective. NMED personnel may participate as observers in these verification visits.  
46 When ~~all~~ actions have been completed and verified as being effective, the CAR is closed by the

1 DOE manager responsible for quality assurance. As part of the planning process for subsequent  
2 audits and surveillances, past deficiencies will be reviewed and the previous deficient activity or  
3 process is subject to reassessment.

4 The NMED may submit a written Observer Inquiry to the DOE if necessary to seek resolution to  
5 a question raised or issue posed during the audit. The DOE shall be responsible for obtaining a  
6 response to the Observer Inquiry and submitting a written response to the NMED within 30 days  
7 of inquiry submission. The NMED will examine the response and consider this information as  
8 part of the audit review and approval process.

9 The sites shall submit corrective action plans to eliminate the deficiency stated on the CAR,  
10 including a resolution of the acceptability of any data generated prior to the resolution of the  
11 corrective action.

12 The corrective action response will include a discussion of the investigation performed to  
13 determine the extent and impact of the deficiency, a description of the remedial actions taken,  
14 determination of root cause, and actions to preclude recurrence.

15 An exit meeting will be conducted by the lead auditor prior to departure of the audit team from  
16 the site. This meeting will include site management personnel, and may include DOE field office  
17 personnel. ~~All-draft-Draft~~ audit results will be presented to the site management.

18 The audit report will be prepared, approved, and issued to the site within 30 days of the  
19 completion of the audit by the DOE. The NMED shall receive a copy of the audit report upon  
20 issuance for information purposes. A formal final audit report will be provided to the NMED  
21 which will include WAP-related CAR resolution results and audit results that will include, as a  
22 minimum, sections describing the scope, purpose, summary of deficiencies, and observations in  
23 narrative format, completed audit checklists, audited procedures, and other applicable  
24 documents which provide evidence of WAP implementation. The report will also include an  
25 identification of the organization audited, the dates of the audit, and the requested response  
26 date. NMED will make the final audit report available for public review and comment. One copy  
27 of the formal final audit report shall be submitted to the NMED in hard copy, but any additional  
28 copies may be submitted in electronic format. The audited site will respond to any deficiencies  
29 and observations within (30 days after receipt of any CARs and indicate the corrective action  
30 taken or to be taken. If the corrective action has not been completed, the response must  
31 indicate the expected date the action will be completed. The CARs applicable to WAP  
32 requirements shall be resolved prior to waste shipment. Subsequent audits or specific  
33 verifications, announced or unannounced, will determine if the corrective action has been  
34 satisfactorily implemented. Deficiencies (items corrected during the audit ~~CDAs~~) and CARs  
35 and observations will be tracked to completion according to established procedure(s). In  
36 addition, deficiencies will be trended to determine if similar situations exist system wide. Trend  
37 reports will be issued as necessary to provide a “lessons learned” announcement to other sites  
38 who might benefit from program improvements implemented as a result of resolutions to the  
39 specific situations discovered at the performance of these audits.

40 As required by Permit Part 2, Section 2.3.2.3, Generator Site Technical Reviews (GSTRs) must  
41 be completed on a biennial basis at each generator/storage site currently shipping waste to  
42 WIPP. Issues identified must be entered into a site’s tracking system, resolved, and tracked to  
43 closure. A section specific to GSTRs must be included in the final audit report for the site,  
44 stating whether a GSTR has been conducted since the previous audit and the status of issues

1 identified. Each GSTR must produce a final report providing evidence that all issues have been  
2 closed out. In order to obtain NMED approval of the final audit report, the most recent GSTR  
3 final report must be included with the submittal.

4 The final audit report provided to the NMED and audit records will be maintained at the WIPP  
5 facility as a part of the Operating Record. These records will be included on the Record  
6 Inventory and Disposition Schedule and maintained on-site until closure of the WIPP facility.  
7 The NMED shall be provided unlimited access to these records.

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## **TABLES**

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**Table C6-1  
 Waste Analysis Plan (WAP) General Checklist for use at DOE'S Generator/Storage Sites**

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Waste Stream Identification</b>						
1	Does the generator/storage site define "waste stream" as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity? ( <del>Attachment C</del> Section C-0a)					
2	Are procedures in place to ensure that the generator/storage site assigns one of the Summary Category Groups (S3000-homogeneous solids, S4000-soils/gravel, S5000-debris waste) to each waste stream? (Section C-1b)					
3	Are procedures in place to ensure that the generator/storage site assigns Waste Matrix Code Subgroups Groups (e.g., solidified inorganics, solidified organics, salt waste, soils, combustible waste, filters, graphite, heterogeneous debris waste, inorganic nonmetal waste, lead/cadmium metal, uncategorized metal) to each waste stream? (Section C-0a)					
4	Are procedures in place to ensure that the generator/storage site assigns a Waste Stream WIPP Identifier (ID) to each waste stream? (Section C3-6b(1))					



	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4a	<p>Are procedures in place for generator/storage sites to submit an AK Sufficiency Determination (Determination Request) to the Permittees to meet <del>all or part of</del> the waste characterization requirements including:</p> <ul style="list-style-type: none"> <li>• <del>All information</del><u>Information</u> specified in Permit Attachment C4, Section C4-3d</li> <li>• Identification of relevant hazardous constituents, and correctly identifies <del>all</del> toxicity characteristic and listed hazardous waste numbers</li> <li>• <del>Hazardous All hazardous</del>-waste number assignments must be substantiated by supporting data and, if not, whether this lack of substantiation compromises the interpretation</li> <li>• Resolution of data discrepancies between different AK sources must be technically correct and documented</li> <li>• The AK Summary includes <del>all</del> the identification of waste material parameter weights by percentage of the material in the waste stream, and determinations are technically correct</li> <li>• <del>All prohibited Prohibited</del> items specified in the TSDF-WAC should be addressed, and conclusions drawn are technically adequate and substantiated by supporting information</li> <li>• If the AK record includes process control information specified in Permit Attachment C4, Section C4-3b, the information should include procedures, waste manifests, or other documentation demonstrating that the controls were adequate and sufficient.</li> <li>• The site must provide the supporting information necessary to substantiate technical conclusions within the Determination Request, and this information must be correctly interpreted.</li> </ul> <p>(Section C-0b, Section C4-3d)</p>					
4b	<p>If a generator/storage site does not submit a Determination Request or if the Determination Request is not approved, are procedures in place for the generator/storage site to perform radiography or VE on <del>100 percent 400%</del> of the containers in a waste stream as specified in Permit Attachment C1?</p> <p>(Section C-0b)</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4c	Are procedures in place to ensure that the generator/storage sites complete a Waste Stream Profile Form (WSPF) and Characterization Information Summary (CIS) as specified in Permit Attachment C3, Sections C3-6b(1) and C3-6b(2)? (Section C-0c)					
6	Are procedures in place to ensure that the generator/storage site assigns EPA hazardous waste numbers associated with the waste? If so, do these assigned EPA hazardous waste numbers correspond to the permitted EPA hazardous waste numbers in Table C-5? Are there any assigned EPA hazardous waste numbers that are not permitted EPA hazardous waste numbers on the Table C-5? If so, did the generator/storage site reject the waste for shipment to and disposal at <u>the WIPP facility</u> ? Did the generator assign a state hazardous waste codes or numbers? If so, is it assigned to waste that is permitted at <u>the WIPP facility</u> ? (Section C-1b)					
7	Are procedures in place to ensure that Summary Category Groups are defined as follows:  S3000- Homogeneous solids are solid material, inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste excluding soils, that do not meet NMED criteria for classification as debris and are at least 50 percent by volume homogeneous solids or comprise the majority of the waste stream  S4000- Waste streams that are at least 50 percent by volume soil/gravel, or comprise the majority of the waste stream  S5000- Waste streams that are at least 50 percent volume materials that meet the NMED criteria for debris, or comprise the majority matrix of materials. The criteria for debris are solid materials intended for disposal that exceed 2.36 inch particle size and is a manufactured object, plant or animal matter, or natural geologic material. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material. (Section C-0a)					

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	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
8	<p>Does the generator/storage facility have procedures in place to ensure that the following waste characterization parameters will be <del>obtained</del>:  <ul style="list-style-type: none"> <li>Determination whether TRU mixed waste streams comply with the applicable provisions of the TSDF-WAC</li> <li>Determination whether TRU mixed wastes exhibit a hazardous characteristic per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart C)</li> <li>Determination whether TRU mixed wastes are listed per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart D)</li> <li>Estimation of waste material parameter weights</li> </ul>           (Section C-2)</p>					
9	<p>Are procedures in place to ensure that waste streams identified to contain incompatible materials or materials incompatible with waste containers cannot be shipped unless treated to remove the incompatibility? (Section C-1c)</p>					
10	<p>Are procedures in place to ensure that the generator/storage site uses <del>acceptable knowledge</del>AK and, as necessary, radiography and <del>visual examination</del>VE analysis as specified in Table C-1? (Section C-3)</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Unacceptable Waste</b>						
12	<p>Are procedures in place to ensure that the generator/storage site ensures, through administrative and operational procedures and characterization techniques, that waste containers do not include the following unacceptable waste:</p> <ul style="list-style-type: none"> <li>liquid waste is not acceptable <del>for disposal</del> at <del>the</del> WIPP facility. Liquid in the quantities delineated below is acceptable               <ul style="list-style-type: none"> <li>Observable liquid shall be no more than <del>4one</del> percent by volume of the outermost container at the time of radiography or <del>visual examination</del>VE</li> <li>Internal containers with more than 60 milliliters or <del>3three</del> percent by volume observable liquid, whichever is greater, are prohibited</li> <li>Containers with Hazardous Waste Number U134 assigned shall have no observable liquid</li> <li>Overpacking the outermost container that was examined during radiography or <del>visual examination</del>VE or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits</li> </ul> </li> <li>non-radionuclide pyrophoric materials</li> <li>hazardous wastes not occurring as co-contaminants with TRU wastes (non-mixed hazardous wastes)</li> <li>wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes</li> <li>wastes containing explosives or compressed gases (continued below)</li> </ul>					

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	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
12a	<ul style="list-style-type: none"> <li>wastes with polychlorinated biphenyls (PCBs) not authorized under an EPA PCB waste disposal authorization</li> <li>wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003)</li> <li>waste that has ever been managed as high-level waste and waste from tanks specified in <u>Permit Attachment C</u>, Table C-4, unless specifically approved through a Class 3 permit modification</li> <li>any waste container from a waste stream (or waste stream lot) which has not undergone either radiographic or <del>visual examination</del><sup>VE</sup> of a statistically representative subpopulation of the wastes stream in each shipment pursuant to Permit Attachment C7</li> <li>any waste container from a waste stream which has not been preceded by an appropriate, certified Waste Stream Profile Form (see Section C-1d)</li> </ul> (Section C-1c)					
<b>Waste Acceptance Control</b>						
14	Are procedures in place to ensure that the generator/storage site uses a <del>Waste Stream Profile Form (WSPF)</del> which includes, at a minimum, the information indicated on the attached WSPF found in <u>Permit Attachment C</u> , Figure C-1 and a <del>Characterization Information Summary (CIS)</del> prior to waste disposal at the WIPP? (Section C-1d)					
16	Are procedures in place to ensure that additional WSPFs are provided to WIPP and NMED for waste streams or portions of waste streams that are reclassified based upon waste characterization information? (Section C-1d)					
16a	Are criteria in place to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required? (Section C-1d)					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>General Characterization Requirements</b>						
24	<p>Are procedures in place to ensure that a Generator Site Technical Review (GSTR) is performed on a biennial basis and that the following is ensured:</p> <ul style="list-style-type: none"> <li>any issues identified the most recent GSTR are being tracked to closure</li> <li>the current status of any issues identified is available</li> <li>the most recent GSTR final report is available for inclusion in the final audit report</li> </ul> <p>(Section C-4)</p>					
25	<p>Are procedures in place to ensure that <del>Acceptable Knowledge</del>AK is used in waste characterization activities to delineate TRU mixed waste streams, to assess whether TRU mixed wastes comply with the TSDf-WAC, to assess whether TRU mixed waste exhibits a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart C), and to assess whether TRU wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart D), and to estimate waste material parameter weights? (Section C-3a)</p>					
26	<p>Are procedures in place to ensure that radiography and/or <del>visual examination</del>VE are used as necessary to:</p> <ul style="list-style-type: none"> <li>Examine a waste container to determine the physical form</li> <li>Identify observable liquid in excess of TSDf-WAC limits and containerized gases</li> <li>Verify the physical form matches the waste stream description</li> </ul> <p>(Section C-3b)</p>					
28	<p>Are procedures in place to ensure that the following characterization activities shall occur:</p> <ul style="list-style-type: none"> <li>Acceptable Knowledge for <del>all</del>wastes, with testing as necessary to augment AK including;           <ul style="list-style-type: none"> <li>Visual examination or radiography for <del>all</del>waste containers</li> </ul> </li> </ul> <p>(Section C4-3e)</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Data Generation, Verification, Validation, Documentation, and Quality Assurance</b>						
30	<p>Are procedures in place to ensure that the following Data Quality Objectives are met:</p> <ul style="list-style-type: none"> <li>Use <del>Acceptable Knowledge</del>AK to delineate TRU mixed waste streams, assess whether TRU mixed wastes comply with the applicable requirements of the TSDF-WAC, assess whether TRU mixed wastes exhibit a hazardous characteristic, assess whether TRU mixed wastes are listed and to estimate waste material parameter weights</li> <li>Use radiography or <del>visual examination</del>VE to verify the physical form of the waste matches its waste stream description as determined by AK and to verify the absence of prohibited items</li> </ul> <p>(Section C-4a(1))</p>					
31	<p>Are procedures in place to ensure that the following Quality Assurance Objectives are adequately defined and assessed for each characterization method:</p> <ul style="list-style-type: none"> <li>Precision as a measure of the mutual agreement among multiple measurements.</li> <li>Accuracy as the degree of agreement between a measurement result and a true or known value.</li> <li>Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained that is expressed as a percentage.</li> <li>Comparability is the degree to which one data set can be compared to another data set.</li> <li>Representativeness as an expression of the degree to which data represent characteristics of a population.</li> </ul> <p>(Section C-4a(2))</p>					



	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
32	<p>With respect to data generation, are procedures in place to ensure that the generator/storage site's waste characterization program meets the following general requirements:</p> <ul style="list-style-type: none"> <li>• Testing data packages and <del>batch data reports</del>BDRs must be reported accurately in a pre-approved format, must be maintained in permanent files, and must be traceable?</li> <li>• <del>All data</del>Data must receive a technical review by another qualified operator?</li> </ul> <p>(Section C3-4a)</p>					
33	Are procedures in place to ensure that the generator/storage site performs validation of waste characterization data for each waste container? (Section C-4)					
34	Are procedures in place to ensure that the generator/storage site has a pre-approved format for reporting waste characterization data? (Section C-4a(3))					
35	Are procedures in place to ensure that the generator/storage site prepares testing <del>batch data reports</del> BDRs to meet the requirements of their own site-specific QAPjP and/or SOPs? (Section C-4a(3))					

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		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
36	<p>Are procedures in place to ensure that <del>all</del> raw data is collected and managed at the data generation level in accordance with the following criteria:</p> <ul style="list-style-type: none"> <li>• <del>Raw All raw</del> data shall be signed and dated in reproducible ink by the individual collecting the data, or signed and dated using electronic signatures</li> <li>• <del>Data All data</del> shall be recorded clearly, legibly, and accurately in field records</li> <li>• <del>All changes</del>Changes to original data shall be lined out, initialed, and dated by the individual making the change. Original data may not be obliterated or otherwise be made unreadable</li> <li>• <del>All data</del>Data shall be transferred and reduced from field records completely and accurately</li> <li>• <del>All field</del>Field records shall be maintained as specified in Table C--2 of Attachment C</li> <li>• Data shall be organized into standard reporting formats for reporting purposes.</li> <li>• <del>All electronic</del>Electronic and video data must be stored to ensure that waste container and QC data are readily retrievable</li> </ul> <p>(Section C3-4a)</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
37	<p>Are procedures in place to ensure that <del>100 percent</del>100 % of <del>batch data reports</del>BDRs are subject to independent technical review by an individual qualified to review the data who was not involved in the generation or recording of the data under review. The reviewer shall release the data through signature with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP <u>facility</u>. The review shall ensure the following, as applicable:</p> <ul style="list-style-type: none"> <li>• Data generation and reduction were conducted according to the methods used and reported in the proper units and significant figures</li> <li>• Calculations have been verified by a valid calculation program, a spot check of verified calculation programs, and/or a 100 percent check of <del>all</del> hand calculations</li> <li>• The data have been reviewed for transcription errors</li> <li>• The testing QA documentation for BDRs is complete and includes, as applicable, raw data, calculation records, calibration records</li> <li>• Radiography tapes are reviewed on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent. The radiography tape will be reviewed against the data on the radiography form to ensure that data are complete and correct</li> <li>• QAOs have been met</li> </ul> <p>(Section C3-4a(1))</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
40	<p>Are procedures in place to ensure that 100 percent of <del>all batch data reports</del>BDRs receive a Site Project Manager (SPM) signature release with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. This release shall ensure the following:</p> <ul style="list-style-type: none"> <li>• Testing batch QC checks were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent</li> <li>• Data generation level independent technical review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases.</li> <li>• Independent technical reviewers were not involved in the generation or recording of the data under review.</li> <li>• Batch Data review checklists are complete</li> <li>• Batch Data Reports are complete and data properly reported</li> <li>• Verify that data are within established data assessment criteria and meet <del>all</del> applicable QAOs</li> </ul> <p>(Section C3-4b(1))</p>					
42	<p>Are procedures in place to ensure that a repeat of the data review process at the data generation level will be performed on a minimum of one randomly chosen waste container every quarter to determine if the verification and validation is performed according to documented procedures? (Section C3-4b)</p>					
43	<p>Are procedures in place and checklists <del>are</del> available to prepare a <del>Site Project Manager (SPM)</del> Summary and a Data Validation Summary (the summaries may be in the same document)? The SPM Summary includes a validation checklist for each batch that is of sufficient detail to document <del>all</del> aspects of a <del>batch data report</del>BDR that could affect data quality. The Data Validation Summary must identify each <del>Batch Data Report</del>BDR reviewed, <del>reviewed</del>, describe how the validation was performed, identify <del>all</del> problems, and identify <del>all</del> acceptable and unacceptable data. Summaries must include release signatures. (Section C3-4b(2))</p>					

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		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
44	Are procedures in place to ensure that non-administrative, WAP-related nonconformances first identified at the <del>site project manager</del> SPM level are reported to the Permittees within seven calendar days of identification, <del>that</del> nonconformance reports are prepared within 30 calendar days, and <del>that</del> corrective action is implemented prior to waste shipment? (Section C3-7)					
45	Are procedures in place to ensure that any waste container for which a nonconformance report (NCR) has been written will not be shipped to the WIPP facility unless the condition that led to the NCR for that container is appropriately identified, reconciled, corrected, and documented? Are nonconformance reports prepared for nonconformances identified? Are nonconformances identified and tracked, and does the <del>Site Project Manager</del> SPM oversee the nonconformance report process? (Section C3-7)					
<b>Data Transmittal</b>						
48	Are procedures in place to ensure that the generator/storage site transmits data by hard copy or electronic copy from the data generation level to the site project level? If electronic, does the generator/site have a hard copy available on demand? (Section C-4a(5))					
50	Are procedures in place to ensure that the generator/storage site inputs the data into the WWIS manually or electronically? (Section C-4a(5))					
51	Are procedures in place to ensure that the generator/storage site enters the data into the WWIS in the exact format required by the database? (Section C-4a(5))					
52	Are procedures in place to ensure <del>all of</del> the data presented on Table C-3 of the Permit is transmitted to the WWIS? (Table C-3)					
<b>Records and Record Management</b>						
55	Are procedures in place to ensure that the generator/storage site's hard copy and/or electronic data reports follow the Permittees' format requirements? (Section C-4a(3))					

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		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
56	<p>Are procedures in place to ensure that hard copy or electronic Waste Stream Profile Form will include the following</p> <ul style="list-style-type: none"> <li>• Generator/storage site name</li> <li>• Generator/storage site EPA ID</li> <li>• Date of audit report approval by <del>the</del> NMED (if obtained)</li> <li>• Original generator of waste stream</li> <li>• Whether waste is <del>Contact-Handled</del>contact-handled or <del>Remote-Handled</del>remote-handled</li> <li>• Waste Stream WIPP Identification Number</li> <li>• Summary Category Group</li> <li>• Waste Matrix Code Group</li> <li>• Waste Material Parameter Weight Estimates per unit of waste</li> <li>• Waste stream name</li> <li>• A description of the waste stream</li> <li>• Applicable EPA hazardous waste numbers</li> <li>• Applicable TRUCON codes</li> <li>• A listing of <del>acceptable knowledge</del>AK documentation used to identify the waste stream</li> <li>• The waste characterization procedures used and the reference and date of the procedure</li> <li>• Certification signature of <del>Site Project Manager</del>SPM, name, title, and date signed</li> </ul> <p>(Section C3-6b(1))</p>					

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	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
56a	<p>Are procedures in place to ensure that hard copy or electronic Characterization Information Summary will include the following:</p> <ul style="list-style-type: none"> <li>• Data reconciliation with DQOs</li> <li>• Radiography and <del>visual examination</del>VE summary to document that <del>all</del> prohibited items are absent in the waste and to verify that the physical form of the waste matches its waste stream description as determined by AK (if applicable).</li> <li>• A complete listing of <del>all</del> container identification numbers used to generate the <del>Waste Stream Profile Form</del>WSPE, cross-referenced to each <del>Batch Data Report</del>BDR.</li> <li>• Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, <del>all</del> references used to generate the AK summary, and any other information required by Permit Attachment C4, Section C4-2b.</li> <li>• Method for determining Waste Material Parameter Weights per unit of waste.</li> <li>• List of any AK Sufficiency Determinations requested for the waste stream.</li> <li>• Certification through <del>acceptable knowledge</del>AK or testing that any waste assigned the hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste.</li> <li>• A justification for the selection of radiography and/or VE as an appropriate method of characterizing the waste.</li> </ul> <p>(Section C3-6b(2))</p>					
56b	Are procedures in place to assure that ongoing container characterization results are cross referenced to <del>Batch Data Reports</del> BDRs? (Section C3-6b)					
58	Are procedures in place to ensure that project level reports are compiled into Characterization Information Summaries (Section C3-6b)					



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	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
59	Are procedures in place to ensure that the generator/storage site uses forms for data reporting that are pre-approved forms in site-specific documentation? (Section C3-6)					
60	Are procedures in place to ensure that the generator/storage site's <del>site project manager</del> SPM submits to the WIPP facility a summary of the waste stream information and reconciliation with data quality objectives (DQOs) once a waste stream is characterized? (Section C-4a(5))					
61	Are procedures in place to ensure that the generator/storage site project office completes a WSPF based on the <del>Batch Data Reports</del> BDRs? (Section C3-6b)					
62	Are procedures in place to ensure that the generator/storage <del>site's Site Project Manager</del> SPM submits the WSPF to the Permittees for DOE's approval along with the accompanying Characterization Information Summary for that waste stream? (Section C-4a(5))					
63	Are procedures in place to ensure that the generator/storage site maintains records related to waste characterization testing activities in the testing facility files, or site project files for those facilities located on-site? (Section C-4a(6))					
64	Are procedures in place to ensure that the appropriate documented training and indoctrination is performed for <del>all</del> individuals and that procedures are documented in site specific QAPJPs and procedures? (Section C3-8)					
66	Are procedures in place to ensure that the generator/storage site has an appropriate records inventory and disposition schedule (RIDS) or equivalent that was prepared and approved by appropriate site personnel? (Section C-4a(6))					
67	Are procedures in place to ensure that the generator/storage site maintains <del>all</del> records relevant to an enforcement action, regardless of disposition, until they are no longer needed for enforcement action, and then dispositioned per the approved RIDS? (Section C-4a(6))					

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	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
68	<p>Are procedures in place to ensure that the generator/storage site maintains records that are designated as Lifetime Records for the life of the waste characterization program plus six years, or that the records have been transferred for permanent archival storage to the WIPP Records Archive facility? Lifetime Records include:</p> <ul style="list-style-type: none"> <li>• Test facility <del>Batch Data Reports</del>BDRs,</li> <li>• Waste Stream Characterization Package,</li> <li>• Data reduction, validation, and reporting documentation,</li> <li>• Acceptable knowledge documentation,</li> <li>• WSPF and Characterization Information Summary</li> </ul> <p>(Section C-4a(6), Table C-2)</p>					
69	<p>Are procedures in place to ensure that the generator/storage site maintains records that are designated as Non-Permanent Records for ten years from the date of record generation, and then dispositioned according per the approved RIDS or transferred to the WIPP Records Archive facility?</p> <p>Non-Permanent Records include:</p> <ul style="list-style-type: none"> <li>• Nonconformance documentation,</li> <li>• Variance documentation,</li> <li>• Assessment documentation,</li> <li>• Calculations and related software documentation,</li> <li>• Training/qualification documentation,</li> <li>• QAPjP documentation (<del>including all</del> revisions),</li> <li>• Calibration documentation,</li> <li>• Procurement documentation,</li> <li>• <del>Quality Assurance</del>QA procedures (<del>including all</del> revisions),</li> <li>• Technical implementing procedures (<del>including all</del> revisions), and</li> <li>• Audio/video recording (radiography, visual, etc.).</li> </ul> <p>(Section C-4a(6), Table C-2)</p>					
70	<p>Are procedures in place to ensure that the generator/storage site has raw data that is identifiable and legible, and provides documentary evidence of quality? (Section C-4a(6))</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
71	Are procedures in place to ensure that if the generator/storage site ceases to operate, that <del>all</del> records be transferred before closeout? (Section C-4a(6))					
<b>Shipment</b>						
72	Are procedures in place to ensure that the generator/storage site accurately completes an EPA Hazardous Waste Manifest prior to shipping the waste to WIPP that contains the following information: <ul style="list-style-type: none"> <li>• Generator/storage site name and EPA ID</li> <li>• Generator/storage site contact name and phone number</li> <li>• Quantity of waste</li> <li>• List of up to six state and/or federal hazardous waste numbers in each line item</li> <li>• Listing of <del>all</del> container <del>IDs</del>IDS</li> <li>• Signature of authorized generator representative</li> </ul> (Section C-5b)					
73	Are procedures in place to ensure that the generator/storage site accurately completes the following container specific information: <ul style="list-style-type: none"> <li>• Waste stream identification number</li> <li>• List of <del>EPA</del> hazardous waste numbers per container</li> <li>• Certification data</li> <li>• Shipping data</li> </ul> (Section C-5b)					

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met

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**Table C6-2  
 Acceptable Knowledge (AK) Checklist<sup>1</sup>**

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>General Requirements</b>						
134	Are the primary document(s) required in Permit Attachment C4 containing <del>acceptable knowledge</del> <u>AK</u> information available? (Section C4-2)					
135	Has the generator developed a methodology whereby a logical sequence of <del>acceptable knowledge</del> <u>AK</u> information that progresses from general facility to more detailed waste-specific information can be acquired? (Section C4-2)					
136	Does the site have adequate procedures in place to ensure that the <del>Acceptable Knowledge</del> <u>AK</u> process is adequately implemented? Do these procedures facilitate the mandatory traceability analysis performed for each Summary Waste Category Group examined during the audit? (Section C4-2)					
137	Does the generator site's TRU mixed waste management program information clearly define (or provide a methodology for defining) waste categorization schemes and terminology, provide a breakdown of the types and quantities of TRU mixed waste generated/stored at the site, and describe how waste is tracked and managed at the generator site (including historical and current operations)? Do procedures ensure that waste streams are adequately identified? (Section C4-2a)					
138	Does site documentation procedures indicate that the site will document, justify, and consistently define waste streams and assign EPA hazardous waste numbers? (Section C4-2b)					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Required and Additional Information</b>						
140	<p>Does the generator site document that the following must be included in the <del>acceptable knowledge</del>AK record:</p> <ul style="list-style-type: none"> <li>• Map of the site with the areas and facilities involved in TRU waste generation, treatment, and storage identified</li> <li>• Facility mission description as related to TRU waste generation and management (e.g., nuclear weapons research may involve metallurgy, radiochemistry, and nuclear physics operations that result in specific waste streams)</li> <li>• Description of the operations that generate TRU waste at the site (e.g., plutonium recovery, weapons design, or weapons fabrication)</li> <li>• Waste identification or categorization schemes used at the facility (e.g., item description codes, content codes)</li> <li>• Types and quantities of TRU mixed waste generated, including historical generation through future projections</li> <li>• Correlation of waste streams generated from the same building and process, as appropriate (e.g., sludge, combustibles, metals, and glass)</li> <li>• Waste certification procedures for retrievably stored and newly generated wastes to be sent to the WIPP facility</li> </ul> <p>(Section C4-2a)</p>					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
141	<p>Does the generator site document that the following shall be collected for each waste stream:</p> <ul style="list-style-type: none"> <li>A. Area(s) and/or building(s) from which the waste stream was or is generated</li> <li>B. Waste stream volume and time period of generation (e.g., 100 standard waste boxes of retrievable stored waste generated from June 1977 through December 1977)</li> <li>C. Waste generating process described for each building (e.g., batch waste stream generated during decommissioning operations of glove boxes), including processes associated with U134 waste generation, if applicable.</li> <li>D. Documentation demonstrating how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed versus TRU non-mixed waste)</li> <li>E. Process flow diagrams (e.g., a diagram illustrating glove boxes from a specific building to a size reduction facility to a container storage area). In the case of research/development, analytical laboratory waste, or the similar processes where process flow diagrams cannot be created, a description of the waste generating processes, rather than a formal process flow diagram, may be included if this modification is justified and the justification is placed in the auditable record</li> <li>F. Material inputs or other information that identifies the chemical content of the waste stream and the physical waste form (e.g., glove box materials and chemical handled during glove box operations, events or processes that may have modified the chemical or physical properties of the waste stream after generation, data obtained through <del>visual examination</del><u>VE</u> of newly generated waste that later undergoes radiography; information demonstrating neutralization of U134 [hydrofluoric acid] and waste compatibility)</li> </ul> <p>(Section C4-2b)</p>					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
142	Do site documents/procedures require that the facility will provide a summary to the Permittees that summarizes <del>all</del> information collected, including basis and rationale for <del>all</del> waste stream designations? Is an example of this summary available for audit review? If discrepant hazardous waste data exist in required information, do sites consider applying <del>all</del> hazardous waste numbers, but assess and evaluate the information to determine the appropriate <u>EPA</u> hazardous waste numbers consistent with RCRA requirements? (Section C4-2b)					
143	Do site procedures indicate that if the required AK information is not available for a particular waste stream, that the waste stream will not be eligible for an AK Sufficiency Determination? (Section C4-2)					
144	Have the following procedures been prepared? A. Procedures for identifying and assigning the physical waste form of the waste B. Procedures for delineating waste streams and assigning Waste Matrix Codes C. Procedures for resolving inconsistencies in <del>acceptable knowledge</del> <u>AK</u> documentation D. Procedures for <del>visual examination</del> <u>VE</u> and/or radiography, if applicable E. For newly generated waste, procedures describing process controls used to ensure prohibited items (specified in the WAP, Permit Attachment C) are documented and managed F. Procedures to ensure radiography and <del>visual examination</del> <u>VE</u> include a list of prohibited items that the operator shall verify are not present in each container (e.g. liquid exceeding TSDf-WAC limits, corrosives, ignitables, reactives, and incompatible wastes) G. Procedures to document how changes to Waste Matrix Codes, waste stream assignment, and associated <del>EPA Environmental Protection Agency</del> hazardous waste numbers based on material composition are documented for any waste H. Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirements, and adequately considers site historical waste management I. Procedures for estimating waste material parameter weights (Section C4-2b)					



	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
145	Does the generator provide procedures or written commitment to collect additional <del>acceptable knowledge</del> <u>AK</u> information, as available and as necessary to augment mandatory information? (Section C4-2c)					
146	Does the generator site document that <del>all</del> -additional specific, relevant information used in the <del>acceptable knowledge</del> <u>AK</u> process will be identified and its use explained? Is <del>all the</del> necessary additional information assembled and has it been appropriately used? (Section C4-2c)					
147	Does the generator site discrepancy analysis documentation (for <del>acceptable knowledge</del> <u>AK</u> additional and required documentation) indicate that if discrepancies are detected, the site may consider applying <del>all</del> - <u>EPA</u> hazardous waste numbers indicated in the required and additional information, but must assess and evaluate the information to determine the appropriate <u>EPA</u> hazardous waste numbers consistent with RCRA requirements? (Section C4-2c)					
<b>Training</b>						
148	Does the generator site have procedures to ensure that <del>all the</del> personnel involved with <del>acceptable knowledge</del> <u>AK</u> waste characterization have the following training, and is this training documented? A. WIPP WAP in Permit Attachment C and the TSDf-WAC specified in this permit B. State and Federal RCRA regulations associated with solid and hazardous waste characterization C. Discrepancy resolution and reporting D. Site-specific procedures associated with waste characterization using <del>acceptable knowledge</del> <u>AK</u> (Section C4-3a)					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Procedures</b>						
149	<p>Has the generator site developed the following procedures, and are these procedures technically sufficient?</p> <p>A. Sites must prepare and implement a written procedure outlining the specific methodology used to assemble <del>acceptable knowledge</del><u>AK</u> records, including the origin of the documentation, how it will be used, and any limitations associated with the information (e.g., identify the purpose and scope of a study that included limited sampling and analysis data).</p> <p>B. Sites must develop and implement a written procedure to compile the required <del>acceptable knowledge</del><u>AK</u> record.</p> <p>C. Sites must develop and implement a written procedure that ensures unacceptable wastes (e.g., reactive, ignitable, corrosive) are identified and segregated from TRU mixed waste populations sent to <del>the</del> <u>WIPP facility</u>.</p> <p>D. Sites must prepare and implement a written procedure to evaluate <del>acceptable knowledge</del><u>AK</u> and resolve discrepancies. For <del>example</del> <u>Example</u> if different sources of information indicate different hazardous wastes are present, then sites must include <del>all</del> sources of information in its records and may choose to either conservatively assign <u>EPA</u> hazardous waste numbers or assign only those numbers deemed appropriate and consistent with RCRA requirements. <del>All information</del><u>Information</u> used to justify assignment of <u>EPA</u> hazardous waste numbers must be placed in the auditable record. Further, the assignment of <u>EPA</u> hazardous waste numbers shall be tracked in the auditable record to <del>all</del> required documentation.</p>					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
149a	<p>E. Sites must prepare and implement a written procedure to identify hazardous wastes and assign the appropriate hazardous waste numbers to each waste stream. The following are minimum baseline requirements/standards that site-specific procedures must include to ensure comparable and consistent characterization of hazardous waste:</p> <ol style="list-style-type: none"> <li>1. Compile <del>all of</del> the required information in an auditable record.</li> <li>2. Review the compiled information and delineate waste streams. Delineation of waste streams must comply with the definition in Permit Attachment C, Section C-0a, and justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream.</li> <li>3. Review the compiled information to determine if the waste stream is compliant with the TSDF-WAC</li> <li>4. Review the required information to determine if the waste is listed under 20.4.1.200 NMAC (incorporating 40 CFR § 261), Subpart D. Assign <del>all the</del> listed <u>EPA</u> hazardous waste numbers, unless the site chooses to justify an alternative assignment and document the justification in the auditable record.</li> <li>5. Review the required information to determine if the waste exhibits a hazardous characteristic or may contain hazardous constituents included in the toxicity characteristics specified in 20.4.1.200 NMAC (incorporating 40 CFR § 261, Subpart C. If a toxicity characteristic contaminant is identified and is not included as a listed waste, sites may evaluate available data and assign the toxicity characteristic <u>EPA</u> hazardous waste number consistent with RCRA requirements. <del>All data</del><u>Data</u> examined to reach the hazardous waste number determination must be placed in the auditable record and must present a clear justification for the <u>EPA</u> hazardous waste number analyses.</li> <li>6. Review the compiled information to provide an estimate of the material parameter weights for each container to be stored or disposed of at <u>the</u> WIPP <u>facility</u>. For newly generated waste, procedures shall be developed and implemented to characterize hazardous waste using <del>acceptable knowledge</del><u>AK</u> prior to packaging.</li> </ol>					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
149b	<p>F. Sites shall ensure that results of audits of the <u>site's</u> TRU mixed waste characterization programs <del>at the site</del> are available in the records.</p> <p>G. Sites shall identify <del>all</del>-process controls (implemented to ensure that the waste contains no prohibited items and to control hazardous waste content and/or physical form) that have been applied to retrievably stored waste and/or may presently be applied to newly generated waste. Process controls are applied <u>at the time</u> of waste generation/packaging to control waste content, whereas any activities performed <u>after</u> waste generation/packaging to identify prohibited items, hazardous waste content, or physical form are waste characterization activities, not process controls. The AK record must contain specific process control and supporting documentation identifying when these process controls are used to control waste content. See Permit Attachment C, Section C-2 for programmatic requirements related to process controls.</p> <p>(Section C4-3b)</p>					
150	<p>Does the site have implemented procedures which comply with the following criteria to establish <del>acceptable knowledge</del>AK records:</p> <p>A. Acceptable knowledge information shall be compiled in an auditable record, including a road map for <del>all-the</del> applicable information.</p> <p>B. The overview of the facility and TRU mixed waste management operations in the context of the facility's mission shall be correlated to specific waste stream information.</p> <p>C. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined.</p> <p>D. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the <del>acceptable knowledge</del>AK information.</p> <p>E. Container inventories for TRU mixed waste in retrievable storage shall be delineated into waste streams by correlating the container identification to <del>all-of</del> the required and additional AK information.</p> <p>(Section C4-3c)</p>					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
151	If the generator site submitted an AK Sufficiency Determination Request for a specific waste stream, did the site provide <del>all of</del> the requisite information for which approval is sought? (Section C-0b)					
<b>Re-evaluating Acceptable Knowledge</b>						
152	Does the generator site have written procedures for the augmentation of <del>all the acceptable knowledge</del> AK information using testing? Testing consists of radiography and <del>visual examination</del> VE. Do site procedures indicate that the following testing will be conducted based upon the results of the Determination Request AKSD denied <del>— 100 percent</del> 100% RTR or VE (Section C4-1, C-0b)					
155	Does the generator site have procedures for reevaluating <del>acceptable knowledge</del> AK if the results of the waste confirmation indicate that the waste to be shipped does not match the approved waste stream or if the data from radiography or <del>visual examination</del> VE for waste streams without an AK Sufficiency Determination exhibit this discrepancy? Does this procedure describe how the waste is reassigned, <del>acceptable knowledge</del> AK reevaluation, and appropriate EPA hazardous waste numbers are assigned? (Section C4-3e)					
156	Do site procedures indicate that debris wastes are assigned toxicity characteristic EPA <del>hazardous waste</del> numbers based on AK regardless of the quantity or concentration? (Section C4-3e)					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Criteria for Assembling an Acceptable Knowledge Record Delineating the Waste Stream</b>						
158	<p>If wastes are reassigned to a different waste matrix code based on site <del>visual examination</del>VE or radiography or Permittee confirmation activities, does the generator site have written documentation to ensure that the following steps are followed:</p> <ul style="list-style-type: none"> <li>F. Review existing information based on the container identification number and document <del>all</del> differences in <u>EPA</u> hazardous waste number assignments</li> <li>G. If differences exist in the <u>EPA</u> hazardous waste numbers that were assigned, reassess and document <del>all</del> required <del>acceptable knowledge</del>AK information (Section C4-3b) associated with the new designation</li> <li>H. Reassess and document <del>all</del> testing data associated with the waste</li> <li>I. Verify and document that the reassigned waste matrix code was generated within the specified time period, area and buildings, waste generating process, and that the process material inputs are consistent with the waste material parameters identified during radiography or <del>visual examination</del>VE</li> <li>J. Record <del>all any</del> changes to <del>acceptable knowledge</del>AK records</li> <li>K. If discrepancies exist in the <del>acceptable knowledge</del>AK information for the revised waste matrix code, document the segregation of the affected portion of the waste stream, and define the actions necessary to fully characterize the waste</li> </ul> <p>(Section C4-3e)</p>					

	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Data Quality Requirements</b>						
168	<p>Are <u>acceptable knowledgeAK</u> processes consistently applied among <del>all</del> generator sites, and does each generator site comply with the following data quality requirements for <u>acceptable knowledgeAK</u> documentation:</p> <p>A. Precision - The qualitative determinations, such as compiling and assessing <u>acceptable knowledgeAK</u> documentation, do not lend themselves to statistical evaluations of precision. However, the <u>acceptable knowledgeAK</u> information will be addressed by the independent review of <u>acceptable knowledgeAK</u> information during internal and external audits.</p> <p>B. Accuracy - The percentage of waste containers which require reassignment to a new waste matrix code and/or designation of different hazardous waste numbers based on testing data and discrepancies identified by the Permittees during waste confirmation will be reported as a measure of <u>acceptable knowledgeAK</u> accuracy.</p> <p>C. Completeness - The <u>acceptable knowledgeAK</u> record must contain 100 percent of the information (Permit Attachment <u>C4, Section C4-3</u>). The usability of the <u>acceptable knowledgeAK</u> information will be assessed for completeness during audits.</p>					
168a	<p>D. Comparability - Comparability is ensured through sites meeting the training requirements and complying with the minimum standards outlined for procedures that are used to implement the <u>acceptable knowledgeAK</u> process. <u>All sites Sites</u> must assign hazardous waste numbers in accordance with Permit Attachment <u>C4, Section C4-4</u> and provide this information regarding its waste to other sites who store or generate a similar waste stream.</p> <p>E. Representativeness - Representativeness is a qualitative parameter that will be satisfied by ensuring that the process of obtaining, evaluating, and documenting <u>acceptable knowledgeAK</u> information is performed in accordance with the minimum standards established in Permit Attachment C4. Sites also must assess and document the limitations of the <u>acceptable knowledgeAK</u> information used to assign hazardous waste numbers (e.g., purpose and scope of information, date of publication, type and extent to which waste parameters are addressed).</p> <p>(Section C3-3)</p>					



	WAP Requirement <sup>2</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
169	Does the generator site address quality control by tracking its performance with regard to the use of <del>acceptable knowledgeAK</del> by: 1) assessing the frequency of inconsistencies among information, and 2) documenting the results of waste discrepancies identified by the generator/storage site during waste characterization or the Permittees during waste confirmation using radiography, review of radiography audio/video recordings, <del>visual examinationVE</del> , or review of <del>visual examinationVE</del> records. In addition, the <del>acceptable knowledgeAK</del> process and waste stream documentation must be evaluated through internal assessments by generator/storage site quality assurance organizations. (Section C4-3e)					

1. The NMED expects a traceability analysis to be performed, the results of which should be presented on this checklist under the "Examples of Implementation" column. Further, the traceability analysis process and results should be discussed in the Final Audit Report.
2. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

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**Table C6-3** —  
**Radiography Checklist**

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Quality Assurance Objectives</b>						
233	<p>Are process procedures in place to meet the following Quality Assurance Objectives?</p> <p><u>Precision</u></p> <ul style="list-style-type: none"> <li>Does the site describe in its QAPjP and SOP(s) activities to reconcile any discrepancies between two radiography operators with regard to identification of the waste matrix code, liquids in excess of TSDF-WAC limits, and compressed gases through independent replicate scans and independent observations? <del>And additionally</del><u>In addition, does the site describe in its QAPjP and SOP(s) activities to verify the precision of radiography prior to use by tuning precisely enough to demonstrate compliance with QAOs through viewing an image test pattern?</u></li> </ul> <p><u>Accuracy</u></p> <ul style="list-style-type: none"> <li>Was accuracy obtained by using a target to tune the image for maximum sharpness and by requiring operators to successfully identify 100 percent of the required items in a training container during their initial qualification and subsequent requalification?</li> </ul>					
233a	<p><u>Completeness</u></p> <ul style="list-style-type: none"> <li>Was an audio/videotape (or equivalent media) of the radiography examination and a radiography data form validated according to the requirements in <u>Permit Attachment C3, Section C3-4</u>?</li> <li>Was an audio/videotape (or equivalent media) of the radiography examination and a radiography data form obtained for <u>100 percent</u><del>100%</del> of the waste containers subject to radiography?</li> </ul> <p><u>Comparability</u></p> <ul style="list-style-type: none"> <li>Is comparability ensured through the use of standardized radiography procedures and operator training and qualifications</li> </ul> <p>(Section C3-2a)</p>					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Characterization and System Requirements</b>						
234	Does the site have procedures to ensure that radiography is used to identify and verify waste container contents and verify the waste's physical form? Does the site have procedures to identify prohibited materials? (Sections C-3b; C1-1)					
235	Do procedures or other supporting documentation ensure that <u>every</u> waste container will undergo radiography and/or VE as necessary to augment AK? (Section C-3b)					
236	Do procedures ensure that containers whose contents prevent full examination are examined by <del>visual examination</del> VE rather than by radiography unless the site certifies that <del>visual examination</del> VE would provide no additional relevant information for that container based on the AK information for the waste stream? (Section C1-1)					
237	Do procedures or other supporting documentation ensure that the physical form determined by radiography is compared with the waste stream descriptions? If discrepancies are noted, will a new waste stream be identified? (Section C-3b)					
238	Are there procedures to ensure the data is obtained from an audio/video recorded scan provided by trained radiography operators? (Section C1-1)					
239	Were <del>all</del> activities required to achieve the radiography objective described in site Quality Assurance Project Plans (QAPjPs) and Standard Operating Procedures (SOPs)? (Section C3-2)					
240	Did the radiography system consist of the following equipment or equivalent: <ul style="list-style-type: none"> <li>• an X-ray producing device?</li> <li>• an imaging system?</li> <li>• an enclosure for radiation protection?</li> <li>• a waste container handling system?</li> <li>• an audio/video recording system or equivalent?</li> <li>• an operator control and data acquisition station?</li> </ul> (Section C1-1)					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
241	Did the X-ray producing device have controls which allow the operator to vary voltage, thereby controlling image quality? Was it possible to vary the voltage, typically between 150-400 kV, to provide an optimum degree of penetration through the waste? Was high-density material examined with the X-ray device set on the maximum voltage? Was low-density material examined at lower voltage settings to improve contrast and image definition? (Section C1-1)					
242	Do procedures or other documentation ensure that an audio/videotape or equivalent is made of the waste container scan and maintained as a non-permanent record? (Section C1-1)					
<b>Data Compilation</b>						
243	Are there procedures to ensure that a radiography data form is used to document the waste matrix code, ensure the waste container contains no ignitable, corrosive or reactive waste by documenting the absence of liquids in excess of TSDF-WAC limits or compressed gases, and verify that the physical form of the waste is consistent with the waste stream description documented on the WSPF? (Section C1-1)					
245	If radiography indicates that the waste does not match the waste stream description, do procedures ensure that the appropriate corrective action was taken? (Section C-3b)					
246	If a discrepancy is noted, do procedures ensure that the proper waste stream assignment is determined, the correct EPA hazardous waste numbers assigned, and the resolution documented? (Section C-3b)					
<b>Training</b>						
247	Do site procedures ensure that only trained personnel are allowed to operate radiography equipment? (Section C1-1)					
248	Do site procedures ensure that training requirements for radiography operators is based upon existing industry standard training requirements? (Section C1-1)					
249	Does the documented training program provide radiography operators with both formal and on-the-job training (OJT)? (Section C1-1)					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
250	Does the documented training program ensure that the radiography operators are instructed in the specific waste generating practices and typical packaging configurations expected to be found in each waste stream at the site? (Section C1-1)					
251	Does the documented training program ensure that the OJT and apprenticeship are conducted by an experienced, qualified radiography operator prior to qualification of the candidate? (Section C1-1)					
252	Is the documented training program site specific? (Section C1-1)					
262	Does the documented training program ensure that a training drum with various container sizes is scanned by each operator on a semiannual basis? Is the videotape reviewed by a supervisor to ensure that operators' interpretations <del>are</del> <u>remain</u> consistent and accurate? (Section C1-1)					
263	Do site procedures ensure that the site prepares Testing Batch Data Reports or equivalent which includes <del>all</del> data pertaining to radiography for up to 20 waste containers without regard to waste matrix? (Section C3-4)					
<b>Quality Assurance</b>						
265	Does the documented training program ensure that the imaging system characteristics are verified on a routine basis? (Section C1-1)					
266	Do procedures ensure that independent replicate scans and replicate observations of the video output of the radiography process are performed under uniform conditions and procedures? Are independent replicate scans performed on one waste container per day or per testing batch of 20 samples, <del>which ever</del> <u>whichever</u> is less frequent, by a qualified radiography operator that was not involved in the original scan of the waste container? Are independent observations of one scan (not the replicate scan) performed once per day or per testing batch, <del>which ever</del> <u>whichever</u> is less frequent, by a qualified radiography operator that was not involved in the original scan of the waste container? (Section C1-1)					
267	Do procedures ensure that oversight functions include periodic audio/video media reviews of accepted waste containers, are performed by qualified radiography operators that were not involved in the original scans of the waste containers? (Section C1-1)					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
268	Is the <del>site project manager</del> <u>SPM</u> responsible for monitoring the quality of the radiography data and calling for corrective action, when necessary? (Section C1-1)					
<b>Data Validation, Review, Verification and Reporting</b>						
277	Do procedures ensure that <del>all</del> -applicable data generation review verification and validation activities specified in <u>Permit Attachment C3, Section C3-4</u> are followed, including <del>all</del> signatory releases? (Section C3-4)					
278	Do procedures ensure that radiography tapes have been reviewed at a frequency of one waste container per day or once per testing batch, whichever is less frequent, to ensure data are correct and completed? (Section C1-1)					
279	Do procedures ensure that <del>all</del> -applicable project-level signatory releases and DQOs (Section C3-3) as specified in the WAP are performed? (Section C3-4b)					
282	At the data generation level, do procedures ensure that <del>all</del> -electronic and video data stored appropriately to ensure that waste container, sample, and associated QA data are readily retrievable? Are radiography tapes reviewed, at a frequency of one waste container per day or once per testing batch, whichever is less frequent, against the data reported on the radiography form? (Sections <u>C3-4a</u> , C3-4a(1))					
283	At the project level, do procedures require the <del>Site Project Manager</del> <u>SPM</u> to certify that the radiography data are complete and acceptable based on the videotape review of at least one waste container per testing batch or daily, whichever is less frequent? (Section C3-4b(1))					

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

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**Table C6-4** —  
**Visual Examination (VE) Checklist**

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Training</b>						
296	Is there documentation which shows that a standardized training program for <del>visual examination</del> VE operators has been developed? Is it specific to the site and include the various waste configurations generated/stored at the site? (Section C1-2)					
297	Is there documentation which shows that the <del>visual examination</del> VE operators receive training on the specific waste generating processes, typical packaging configurations, and waste material parameters expected to be found in each Waste Matrix Code at the site? (Section C1-2)					
298	Are the <del>visual examination</del> VE personnel requalified once every two years? (Section C1-2)					
298a	Does the training include the following regardless of Summary Category Group? <ul style="list-style-type: none"> <li>• Identifying and describing the contents of a waste container by examining <del>all</del> items in waste containers of previously packaged waste.</li> <li>• Identifying when VE cannot be used to meet the DQOs,</li> </ul> (Section C1-2)					
<b>Visual Examination Expert Requirements</b>						
300	Does documentation ensure that the site has designated a <del>visual examination</del> VE expert? Is the <del>visual examination</del> VE expert familiar with the waste generating processes that have taken place at the site? Is the <del>visual examination</del> VE expert familiar with <del>all of</del> the types of waste being characterized at that site? (Section C1-2)					
301	Does documentation ensure that the <del>visual examination</del> VE expert shall be responsible for the overall direction and implementation of the <del>visual examination</del> VE aspects of the program? Does the site's QAPJP specify the selection, qualification, and training requirements of the <del>visual examination</del> VE expert? (Section C1-2)					



	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Visual Examination Procedures</b>						
304	Do procedures indicate that <del>all visual examination</del> VE activities are documented on video/audio media or VE performed by using a second operator to provide additional verification by reviewing the contents of the waste container to ensure correct reporting? (Section C1-2)					
304a	Are procedures in place to ensure that when VE is performed using a second operator, each operator performing VE shall observe for themselves the waste being placed in the container or the contents within the examined waste container when waste is not removed? (Section C1-2)					
313	Do site procedures ensure that when liquid is found, the non-transparent internal container holding the liquid will be assumed to be filled with liquid and this volume will be added to the total liquid in the container being characterized using VE? The container being characterized using VE would then be rejected and/or repackaged to exclude the internal container if it is over the TSDF-WAC limits. (Section C-3b)					

	WAP Requirement <sup>1</sup>	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<b>Quality Assurance Objectives</b>						
314	Are process procedures in place to meet the following Quality Assurance Objectives? <u>Precision</u> <ul style="list-style-type: none"> <li>Precision is maintained by reconciling any discrepancies between the operator and the independent technical reviewer with regard to identification of waste matrix code, liquids in excess of TSDF-WAC limits, and compressed gases.</li> </ul> <u>Accuracy</u> <ul style="list-style-type: none"> <li>Accuracy is maintained by requiring operators to pass a comprehensive examination and demonstrate satisfactory performance in the presence of the VE expert during their initial qualification. <del>VE</del>Visual examination operators shall be requalified every two years.</li> </ul> <u>Completeness</u> <ul style="list-style-type: none"> <li>A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.</li> </ul> <u>Comparability</u> <ul style="list-style-type: none"> <li>The comparability of VE data from different operators shall be enhanced by using standardized VE procedures and operator qualifications.</li> </ul> (Section C3-2b)					

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

**ATTACHMENT C7**  
**TRU WASTE CONFIRMATION**

**ATTACHMENT C7**  
**TRU WASTE CONFIRMATION**  
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<b>Figure</b>	<b>Title</b>
Figure C7-1	Overview of Waste Confirmation

## ATTACHMENT C7

### TRU WASTE CONFIRMATION

#### Introduction

The Permittees demonstrate compliance with the waste analysis requirements of the Permit by ensuring that the waste characterization processes performed by generator/storage sites (**sites**) produce data compliant with the Waste Analysis Plan (WAP) and through the waste screening and verification processes. Verification occurs at three levels: 1) the data generation level, 2) the project level, and 3) the Permittee level. The Permittees also examine a representative subpopulation of waste prior to shipment to confirm that the waste contains no ignitable, corrosive or reactive waste; and that assigned U.S. Environmental Protection Agency (EPA) hazardous waste numbers are allowed by the Permit. The waste confirmation activities described herein occur prior to shipment of the waste from the generator/storage site to the Waste Isolation Pilot Plant (WIPP) facilityWIPP.

#### C7-1 Permittee Confirmation of TRU Mixed Waste

Waste confirmation is defined in Permit Part 1, Section 1.5.12 as the activities performed by the Permittees or the co-Permittee the U.S. Department of Energy (**DOE**), pursuant to this Permit Attachment, to satisfy the requirements specified in Section 310 of Pub. L. 108-447. Waste confirmation occurs after waste containers have been certified for shipment to and disposal at the WIPP facility. The general confirmation process for WIPP waste is presented in Figure C7-1.

#### C7-1a Confirmation of a Representative Subpopulation of the Waste

The Permittees shall confirm that the waste contains no ignitable, corrosive, or reactive waste through radiography (Section C7-1b) or the use of visual examination (VE) (Section C7-1c) of a statistically representative subpopulation of the waste. Prior to shipment to the WIPP facility, waste confirmation will be performed on randomly selected containers from each contact-handledCH and remote-handledRH transuranic (TRU) mixed waste stream shipment. Figure C7-1 presents the overall waste verification and confirmation process.

Waste confirmation encompasses ensuring that the physical characteristics of the TRU mixed waste correspond with its waste stream description and that the waste does not contain liquid in excess of Treatment, Storage, and Disposal Facility-Waste Acceptance Criteria (TSDF-WAC) limits or compressed gases. These techniques can detect liquid that exceeds one percent volume of the container and containerized gases, which are prohibited from storage or disposal at the WIPP facility. The prohibition of liquid in excess of TSDF-WAC limits and containerized gases prevents the storage or disposal of ignitable, corrosive, or reactive wastes. Radiography and/or visual examinationVE will ensure that the physical form of the waste matches its waste stream description (i.e., Homogeneous Solids, Soil/Gravel, or Debris Waste). The results of waste confirmation activities, including radiography and visual examinationVE records (data sheets, packaging logs, and/or video and audio recordings) will be maintained in the WIPP facility operating recordOperating Record. Noncompliant waste identified during waste confirmation will be managed as described in Section C7-2.

1 The Permittees shall randomly select at least ~~7~~seven percent of each waste stream shipment  
2 for waste confirmation. This equates to a minimum of one container from each fourteen  
3 containers in each waste stream in each designated shipment. If there are less than fourteen  
4 containers from a waste stream in a particular shipment, a minimum of one container from the  
5 waste stream shipped will be selected. If the random selection of containers in a shipment  
6 occurs prior to loading the waste containers into the ~~shipping package~~Shipping Package, the  
7 randomly selected containers may be consolidated into a single Type B package consistent with  
8 transportation requirements. Documentation of the random selection of containers for waste  
9 confirmation will be placed in the WIPP facility ~~operating record~~Operating Record.

10 For each container selected for confirmation in accordance with the process above, the  
11 Permittees will examine the respective nonconformance report (**NCR**) documentation to verify  
12 NCRs have been dispositioned for the selected container as required by Permit Attachment C3,  
13 Section C3-7.

#### 14 C7-1a(1) TRU Waste Confirmation Training Requirements

15 ~~Transuranic TRU~~-waste confirmation may be completed by performing actual radiography/~~visual~~  
16 ~~examination~~VE on the waste container(s) or by a review of radiography/~~visual examination~~VE  
17 media and records. This allows for a tiered approach for the training of ~~the Permittees'~~WIPP  
18 TRU waste confirmation personnel.

19 ~~The Permittees'~~ TRU waste confirmation personnel may be trained to either review  
20 radiography/~~visual examination~~VE media and records (Level 1) or to perform actual  
21 radiography/~~visual examination~~VE on the waste container(s) (Level 2). Level 2 personnel may  
22 also perform waste confirmation by review of media and records.

#### 23 C7-1b Radiography Methods Requirements

24 Radiography has been developed by the Permittees specifically to aid in the examination and  
25 identification of containerized waste. The Permittees shall describe ~~all~~the activities required to  
26 achieve the radiography objectives in standard operating procedures (**SOPs**). These SOPs shall  
27 include instructions specific to the radiography system(s) used by the Permittees at an off-site  
28 facility (e.g., the generator/storage site). For example, to detect liquid, some systems require the  
29 container to be rotated back and forth while other systems require the container to be tilted.

30 A radiography system (e.g., real time radiography, digital radiography/computed tomography)  
31 normally consists of an ~~X~~x-ray-producing device, an imaging system, an enclosure for radiation  
32 protection, a waste container handling system, a video and audio recording system, and an  
33 operator control and data acquisition station. ~~Although these six components are required, it~~It is  
34 expected there will be some variation within a given component between radiography systems.  
35 The radiography system shall have controls, or an equivalent process, which allow the operator  
36 to control image quality. On some radiography systems, it should be possible to vary the  
37 voltage, typically between 150 to 400 kilovolts (~~kV~~), to provide an optimum degree of  
38 penetration through the waste. For example, high-density material should be examined with the  
39 ~~X~~x-ray device set on the maximum voltage. This ensures maximum penetration through the  
40 waste container. Low-density material should be examined at lower voltage settings to improve  
41 contrast and image definition. The imaging system typically utilizes either a fluorescent screen  
42 and a low-light television camera or x-ray detectors to generate the image.



1 To perform radiography, the waste container is scanned while the operator views the television  
2 screen. A video and audio recording is made of the waste container scan and is maintained in  
3 the WIPP facility ~~operating record~~Operating Record as a non-permanent record. A radiography  
4 data form is also used to document the Waste Matrix Code, ensure that the waste container  
5 contains no ignitable, corrosive, or reactive waste by documenting the absence of liquid in  
6 excess of TSDF-WAC limits or compressed gases, and verify that the physical form of the waste  
7 is consistent with the waste stream description documented on the Waste Stream Profile Form  
8 (WSPF). Containers whose contents prevent full examination of the remaining contents shall be  
9 subject to ~~visual examination~~VE unless the Permittees certify that ~~visual examination~~VE would  
10 provide no additional relevant information for that container based on the acceptable knowledge  
11 information for the waste stream. Such certification shall be documented in the WIPP facility  
12 ~~operating record~~Operating Record.

13 For containers that have been characterized using radiography by the generator/storage sites in  
14 accordance with the method in Permit Attachment C1, Section C1-1~~C1-3~~, the Permittees may  
15 perform confirmation by review of the generator/storage site's radiography audio/video  
16 recordings.

17 For containers which contain classified shapes and undergo radiography, the radiography will  
18 occur at a facility with appropriate security provisions and the video and audio recording will be  
19 considered classified. The radiography data forms will not contain classified information.

#### 20 C7-1b(1) Radiography Training

21 The radiography system involves qualitative and semiquantitative evaluations of visual displays.  
22 Operator training and experience are the most important considerations for ensuring quality  
23 controls in regard to the operation of the radiography system and for interpretation and  
24 disposition of radiography results. Only trained personnel shall be allowed to operate  
25 radiography equipment.

26 Radiographer Level 1 personnel performing TRU mixed waste confirmation shall be trained in:

- 27 • TRU Waste Confirmation Radiographer Level 1 Qualification.

28 Radiographer Level 2 personnel performing TRU mixed waste confirmation shall be trained in:

- 29 • TRU Waste Confirmation Radiographer Certification Level 2 Qualification.

#### 30 C7-1b(1)(i) TRU Waste Confirmation Radiographer Certification Level 1 Qualification

31 Level 1 radiographer operators are instructed in the specific waste-generating practices and  
32 typical packaging configurations expected to be found in each Waste Matrix Code at each site  
33 shipping waste to the WIPP facility. The on-the-job training (**OJT**) and apprenticeship is  
34 conducted by an experienced, qualified radiography operator or trainer prior to the qualification  
35 of the training candidate. Radiography operators are qualified once every two years.

36 The ~~level~~Level 1 radiography training program includes the following elements:

37 Formal Training

- 1           • Project Requirements
- 2           • State and Federal Regulations
- 3           • Basic Principles of Radiography
- 4           • Radiography of Waste Forms (including the ability to identify liquid and compressed
- 5           gases which will be verified by the radiography subject matter expert)
- 6           • Waste Stream-Specific Instruction (e.g., specific waste-generating processes, typical
- 7           packaging configurations, waste material parameters)
- 8

9   On-the-Job Training

- 10           • System Operation (equipment and procedures used by Level 1 radiographers)
- 11           • Identification of Packaging Configurations
- 12           • Identification of Waste Material Parameters/Waste Matrix Codes
- 13           • Identification of liquid in excess of the TSDF-WAC limits and compressed gases
- 14           • Verification of waste stream description
- 15

16   C7-1b(1)(ii) TRU Waste Confirmation Radiographer Level 2 Qualification

17   Level 2 radiography operators are instructed in the specific waste-generating practices and  
18   typical packaging configurations expected to be found in each Waste Matrix Code at each site  
19   shipping waste to the WIPP facility. The OJT and apprenticeship are conducted by an  
20   experienced qualified radiography operator prior to the qualification of the training candidate.  
21   Radiography operators are requalified once every two years.

22   The Level 2 radiography training program included the following elements:

23   Formal Training

- 24           • Project Requirements
- 25           • State and Federal Regulations
- 26           • Basic Principles of Radiography
- 27           • Radiographic Image Quality
- 28           • Radiographic Scanning Techniques
- 29           • Application Techniques

- 1           • Radiography of Waste Forms
- 2           • Standards, Codes, and Procedures for Radiography
- 3           • Waste Stream-Specific Instruction
- 4
- 5 On-the-Job Training
- 6           • System Operation
- 7           • Identification of Packaging Configurations
- 8           • Identification of Waste Material Parameters/Waste Matrix Codes
- 9           • Identification of liquid in excess of the TSDf-WAC limits and compressed gases
- 10          • Verification of waste stream description
- 11

#### 12 C7-1b(2) Radiography Oversight

13 The Permittees shall be responsible for monitoring the quality of the radiography data and  
14 calling for corrective action, when necessary.

15 A training drum with internal containers of various sizes shall be scanned biennially by each  
16 Level 2 operator. The video and audio media shall then be reviewed by a radiography subject  
17 matter expert to ensure that operators' interpretations remain consistent and accurate. Imaging  
18 system characteristics shall be verified on a routine basis.

19 Independent replicate scans and replicate observations of the video output of the radiography  
20 process shall be performed under uniform conditions and procedures. Independent replicate  
21 scans shall be performed on one waste container per day or once per shipment, whichever is  
22 less frequent. Independent observations of one scan (not the replicate scan) shall also be made  
23 once per day or once per shipment, whichever is less frequent, by a qualified radiography  
24 operator other than the individual who performed the first examination. When confirmation is  
25 performed by review of audio/video recorded scans produced by the generator/storage site as  
26 specified in Permit Attachment C1, Section C1-1, independent observations shall be performed  
27 on two waste containers per shipment or two containers per day, whichever is less frequent.

#### 28 C7-1c Visual Examination Methods Requirements

29 Visual examination (~~VE~~) may also be used as a waste confirmation method. Visual  
30 examination~~VE~~ shall be conducted by the Permittees in accordance with written SOPs to  
31 describe the contents of a waste container. Visual examination shall be conducted to identify  
32 and describe ~~all~~ waste items, packaging materials, and waste material parameters. Visual  
33 examination~~VE~~ may be used to examine a statistically representative subpopulation of the  
34 waste certified for shipment to the WIPP facility to confirm that the waste contains no ignitable,  
35 corrosive, or reactive waste. This is achieved by confirming that the waste contains no liquid in  
36 excess of TSDf-WAC limits or compressed gases, and that the physical form of the waste  
37 matches the waste stream description documented on the WSPF. During packaging, the waste  
38 container contents are directly examined by trained personnel. This form of waste confirmation

1 may be performed by the Permittees at a generator/storage site. The VE may be documented  
2 on video and audio media, or by using a second operator to provide additional verification by  
3 reviewing the contents of the waste container to ensure correct reporting. When VE is  
4 performed using a second operator, each operator performing the VE shall observe for  
5 themselves the waste being placed in the waste container or the contents within the examined  
6 waste container when waste is not removed. The results of ~~all~~ VE shall be documented on VE  
7 data forms, which are used to document (1) the Waste Matrix Code, (2) that the waste container  
8 contains no ignitable, corrosive, or reactive waste by documenting the absence of liquids in  
9 excess of TSDf-WAC limits or compressed gases, and (3) that the physical form of the waste is  
10 consistent with the waste stream description documented on the WSPF.

11 In order to keep radiation doses as low as reasonably achievable at generator/storage sites, the  
12 Permittees may use their own trained VE operators to perform VE for waste confirmation by  
13 reviewing generator/storage site VE data, which includes VE data forms, waste packaging  
14 records, and may also include audio/video media. The Permittees shall document their review of  
15 generator/storage site VE data on confirmation data forms.

16 If the generator/storage site documented VE using audio/video media in accordance with Permit  
17 Attachment C1, Section C1-2, the Permittees must use the audio/video media to perform  
18 confirmation. If the Permittees perform waste confirmation by review of audio/video media, the  
19 audio/video record of the VE must be sufficiently complete for the Permittees to confirm the  
20 Waste Matrix Code and waste stream description, and verify the waste contains no liquid in  
21 excess of TSDf-WAC limits or compressed gases. Generator/storage site VE video/audio  
22 media subject to review by the Permittees shall meet the following minimum requirements:

- 23 • The video/audio media shall record the waste packaging event for the container such  
24 that ~~all~~ waste items placed into the container are recorded in sufficient detail and shall  
25 contain an inventory of waste items in sufficient detail that a trained Permittee VE  
26 operator can identify the associated waste material parameter.
- 27 • The video/audio media shall capture the waste container identification number.
- 28 • The personnel loading the waste container shall be identified on the video/audio media  
29 or on packaging records traceable to the loading of the waste container.
- 30 • The date of loading of the waste container will be recorded on the video/audio media or  
31 on packaging records traceable to the loading of the waste container.

32 ~~VE~~Visual examination audio/video media of containers that contain classified shapes shall be  
33 considered classified information.

34 If the generator/storage site did not document VE using audio/video media, the Permittees may  
35 use their own trained VE operators to perform VE for waste confirmation by reviewing VE data  
36 forms or packaging records prepared by the generator/storage site. To be acceptable, the  
37 generator/storage site VE data forms or packaging records must be signed by two  
38 generator/storage site personnel who witnessed the packaging of the waste and must provide  
39 sufficient information for the Permittees to determine that the waste container contents match  
40 the waste stream description on the WSPF and the waste contains no liquids in excess of  
41 TSDf-WAC limits or compressed gases. Generator/storage site VE forms or packaging records  
42 subject to review by the Permittees shall meet the following minimum requirements:

- 1           • At least two generator site personnel who witnessed the packaging of the waste shall  
2           approve the data forms or packaging records attesting to the contents of the waste  
3           container.
  
- 4           • The data forms or packaging records shall contain an inventory of waste items in  
5           sufficient detail that a trained Permittee VE operator can identify the associated waste  
6           material parameters.
  
- 7           • The waste container identification number shall be recorded on the data forms or  
8           packaging records.

9           Visual examination video/audio media of containers which contain classified shapes shall be  
10           considered classified information. Visual examination data forms will not contain classified  
11           information.

12           C7-1c(1)      Visual Examination Training

13           Visual Examination Operator/Expert Level 1 personnel performing TRU mixed waste  
14           confirmation shall be trained in:

- 15           • TRU Waste Confirmation Visual Examination Level 1 Qualification.

16           Visual Examination Operator/Expert Level 2 performing TRU mixed waste confirmation shall be  
17           trained in:

- 18           • TRU Waste Confirmation Visual Examination Level 2 Qualification.

19           C7-1c(1)(i)    TRU Waste Confirmation Visual Examination Level 1 Qualification

20           Level 1 ~~visual examination~~VE personnel are instructed in the specific waste-generating  
21           processes, typical packaging configurations, and waste material parameters expected to be  
22           found in each Waste Matrix Code in the waste stream being confirmed using ~~visual~~  
23           ~~examination~~VE. The OJT and apprenticeship are conducted by an operator experienced and  
24           qualified in ~~visual examination~~VE or a qualified trainer prior to qualification of the candidate.  
25           The training is waste stream specific to include the various waste configurations being  
26           confirmed. For example, the particular physical forms and packaging configurations at each site  
27           will vary and operators shall be trained on types of waste that are generated, stored, and/or  
28           characterized at that particular site. -Visual examination personnel are requalified once every  
29           two years.

30           The Level 1 ~~visual examination~~VE training program included the following elements:

31           Formal Training

- 32           • Project Requirements
- 33           • State and Federal Regulations
- 34           • Batch Data Report Forms

- 1 • Waste Stream-Specific Instruction (e.g., waste-generating processes, typical  
2 packaging configurations, waste material parameters)

3  
4 On-the-Job Training

- 5 • System Operation (equipment and procedures used by Level 1 ~~visual examination~~VE  
6 personnel)
- 7 • Identification of Packaging Configurations
- 8 • Identification of Waste Material Parameters/Waste Matrix Codes
- 9 • Identification of liquid in excess of the limits in the TSDf-WAC and compressed gases
- 10 • Verification of waste stream description

11  
12 C7-1c(1)(ii) TRU Waste Confirmation Visual Examination Level 2 Qualification

13 Level 2 ~~visual examination~~VE personnel are instructed in the specific waste-generating  
14 processes, typical packaging configurations, and waste material parameters expected to be  
15 found in each Waste Matrix Code in the waste stream being confirmed using ~~visual~~  
16 ~~examination~~VE. The OJT and apprenticeship are conducted by an operator experienced and  
17 qualified in ~~visual examination~~VE or a qualified trainer prior to qualification of the candidate.  
18 The training is waste stream specific to include the various waste configurations being  
19 confirmed. For example, the particular physical forms and packaging configurations at each site  
20 will vary so operators shall be trained on types of waste that are generated, stored, and/or  
21 characterized at that particular site. Visual examination personnel are requalified once every  
22 two years.

23 The Level 2 ~~visual examination~~VE training program includes the following elements:

24 Formal Training

- 25 • Project Requirements
- 26 • State and Federal Regulations
- 27 • Batch Data Report Forms
- 28 • Application Techniques
- 29 • Waste Stream-Specific Instruction (e.g., specific waste-generating processes, typical  
30 packaging configurations, waste material parameters)

31 On-the-Job Training

- 32 • Identification of Packaging Configurations
- 33 • Identification of Waste Material Parameters/Waste Matrix Codes

- 1 • Identification of liquid in excess of the TSDF-WAC limits and compressed gases
- 2 • Verification of waste stream description

#### 3 4 C7-1c(2) Visual Examination Oversight

5 The Permittees shall designate at least one VE expert. The VE expert shall be familiar with the  
6 processes that were used to generate the waste streams being confirmed using VE. The VE  
7 expert shall be responsible for the overall direction and implementation of the ~~Permittees~~  
8 ~~'sPermittees'~~ VE program. The Permittees shall specify the selection, qualification, and training  
9 requirements of the ~~visual examination~~VE expert in an SOP.

#### 10 C7-1d Quality Assurance Objectives ~~(QAOs)~~ for Radiography and Visual Examination

11 The Quality Assurance Objectives (QAOs)QAOs the Permittees must meet for radiography and  
12 ~~visual examination~~VE are detailed in this section. If the QAOs described below are not met, then  
13 corrective action as specified in Permit Attachment C3, Section C3-7 shall be taken.

#### 14 C7-1d(1) Radiography Quality Assurance ObjectivesQAOs

15 The QAOs for radiography are detailed in this section. If the QAOs described below are not met,  
16 then corrective action shall be taken.

17 Data to meet these objectives must be obtained from a video and audio recorded scan provided  
18 by trained radiography operators. Results must also be recorded on a radiography data form.  
19 The precision, accuracy, representativeness, completeness, and comparability objectives for  
20 radiography data are presented below.

#### 21 Precision

22 Precision is maintained by reconciling any discrepancies between two radiography operators  
23 with regard to the waste stream waste confirmation, identification of liquid in excess of TSDF-  
24 WAC limits, and identification of compressed gases through independent replicate scans and  
25 independent observations.

#### 26 Accuracy

27 Accuracy is obtained by using a target to tune the image for maximum sharpness and by  
28 requiring operators to successfully identify 100 percent of the required items in a training  
29 container during their initial qualification and subsequent requalification.

#### 30 Representativeness

31 Representativeness is ensured by performing radiography on a random sample of waste  
32 containers from each waste stream in each shipment.

#### 33 Completeness

34 A video and audio media recording of the radiography examination and a validated radiography  
35 data form will be obtained for 100 percent of the waste containers subject to radiography.



1 Comparability

2 The comparability of radiography data from different operators shall be enhanced by using  
3 standardized radiography procedures and operator qualifications.

4 C7-1d(2) Visual Examination ~~Quality Assurance ObjectivesQAQOs~~

5 Results must be recorded on a VE data form. The precision, accuracy, representativeness,  
6 completeness, and comparability objectives for VE data are presented below.

7 Precision

8 Precision is maintained by reconciling any discrepancies between the operator and the  
9 independent technical reviewer with regard to the waste stream waste confirmation,  
10 identification of liquid in excess of TSDF-WAC limits, and identification of compressed gases.

11 Accuracy

12 Accuracy is maintained by requiring operators to pass a comprehensive examination and  
13 demonstrate satisfactory performance in the presence of the VE expert during their initial  
14 qualification. ~~Visual examination~~VE operators shall be requalified once every two years.

15 Representativeness

16 Representativeness is ensured by performing VE on a random sample of waste containers  
17 within each waste stream in each shipment.

18 Completeness

19 A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.

20 Comparability

21 The comparability of VE data from different operators shall be enhanced by using standardized  
22 VE procedures and operator qualifications.

23 C7-1e Review and Validation of Radiography and Visual Examination Data Used for Waste  
24 Examination

25 This section describes the requirements for review and validation of radiography and VE data by  
26 the Permittees.

27 C7-1e(1) Independent Technical Review

28 The radiography and/or VE confirmation data for each shipment shall receive an independent  
29 technical review. This review will be performed before the affected waste shipment is shipped to  
30 the WIPP facility. The review shall be performed by an individual other than the data generator  
31 who is qualified to have performed the work. The review will be performed in accordance with  
32 approved Permittee SOPs and will be documented on a review checklist. The reviewer(s) must  
33 approve the data as evidenced by signature, and as a consequence, ensure the following:



- 1 • Data generation and reduction were conducted in a technically correct manner in  
2 accordance with the methods used (procedure with revision). Data were reported in the  
3 proper units and correct number of significant figures.
- 4 • The data have been reviewed for transcription errors.
- 5 • Radiography video and audio media recordings have been reviewed (independent  
6 observation) on a waste container basis at a minimum of once per shipment or once per  
7 day of operation, whichever is less frequent. The radiography video/audio recording will  
8 be reviewed against the data reported on the ~~Permittees~~ 'sPermittees' radiography form  
9 to ensure that the data are correct and complete. If review of radiography scans  
10 recorded by the generator/storage site was used to perform confirmation, two  
11 observations must be performed for each shipment or two observations per day,  
12 whichever is less frequent.

### 13 C7-1e(2) DOE Management Representative Review

14 The radiography and/or ~~visual examination~~VE data forms and independent technical review  
15 checklist (confirmation data package) for each shipment shall receive a DOE management  
16 review. This review will be performed before the affected waste shipment is disposed of at the  
17 WIPP facility. The review shall be performed by a designated representative of DOE  
18 management. The review will be performed in accordance with approved DOE SOPs and will be  
19 documented on a review checklist. The reviewer(s) must approve the confirmation data package  
20 as evidenced by signature, and as a consequence, ensure the following:

- 21 • The data are technically reasonable based on the technique used.
- 22 • The data have received independent technical review.
- 23 • The data indicate that the waste examined contained no ignitable, corrosive, or reactive  
24 waste and that the physical form of the waste was consistent with the waste stream  
25 description in the WSPF.
- 26 • Quality control~~QC~~ checks have been performed (e.g., replicate scans, image quality  
27 checks).
- 28 • The data meet the established QAOs

29 Upon completion of the DOE ~~management representative~~Management Representative review,  
30 the waste confirmation data for the shipment shall be submitted to the WIPP facility ~~operating~~  
31 record-Operating Record as non-permanent records. Waste confirmation data includes  
32 radiography and VE data forms, video/audio media, and review checklists.

### 33 C7-1e(3) DOE Management Representative Training

34 The DOE Management Representative performing TRU mixed waste confirmation data package  
35 review and approval shall be trained in:

- 36 • Required Reading:

- 1           0    The DOE's Quality Assurance Program Document
- 2           0    Permit Attachments C through C7
- 3           0    Required Reading identified in DOE's management procedure, *Approval of*
- 4                    *Contractor-Generator Confirmation Data Packages*

5    C7-2 Noncompliant Waste Identified During Waste Confirmation

6    If the Permittees identify noncompliant waste during waste confirmation at a generator/storage  
7    site (i.e., the waste does not match the waste stream description documented in the WSPF or  
8    there is liquid in excess of TSDf-WAC limits or compressed gases) the waste will not be  
9    shipped, and the Management and Operating Contractor and the DOE Carlsbad Field Office will  
10   be notified. The DOE will suspend further shipments of the affected waste stream and issue a  
11    Corrective Action Report (CAR) to the generator/storage site. Shipments of affected waste  
12    streams shall not resume until the CAR has been closed. The New Mexico Environment  
13    Department (NMED) will be notified within 24 hours of any suspension of waste stream  
14    shipments due to the identification of noncompliant waste during waste confirmation.

15   As part of the corrective action plan in response to the CAR, the generator/storage site will  
16   evaluate whether the waste characterization information documented in the Characterization  
17   Information Summary (CIS) and/or WSPF for the waste stream must be updated because the  
18   results of waste confirmation for the waste stream indicated that the TRU mixed waste being  
19   examined did not match the waste stream description. The generator/storage site will thoroughly  
20   evaluate the potential impacts on waste that has been shipped to the WIPP facility. The DOE  
21   will evaluate the potential that prohibited items were shipped to the WIPP facility and what  
22   remedial actions should occur, if any. The results of these evaluations will be provided to the  
23   NMED before shipments of affected waste streams resume. If the CIS Characterization  
24   Information Summary or WSPF requires revision, shipments of the affected waste stream shall  
25   not resume until the revised waste stream waste characterization information has been  
26   reviewed and approved by the DOE.

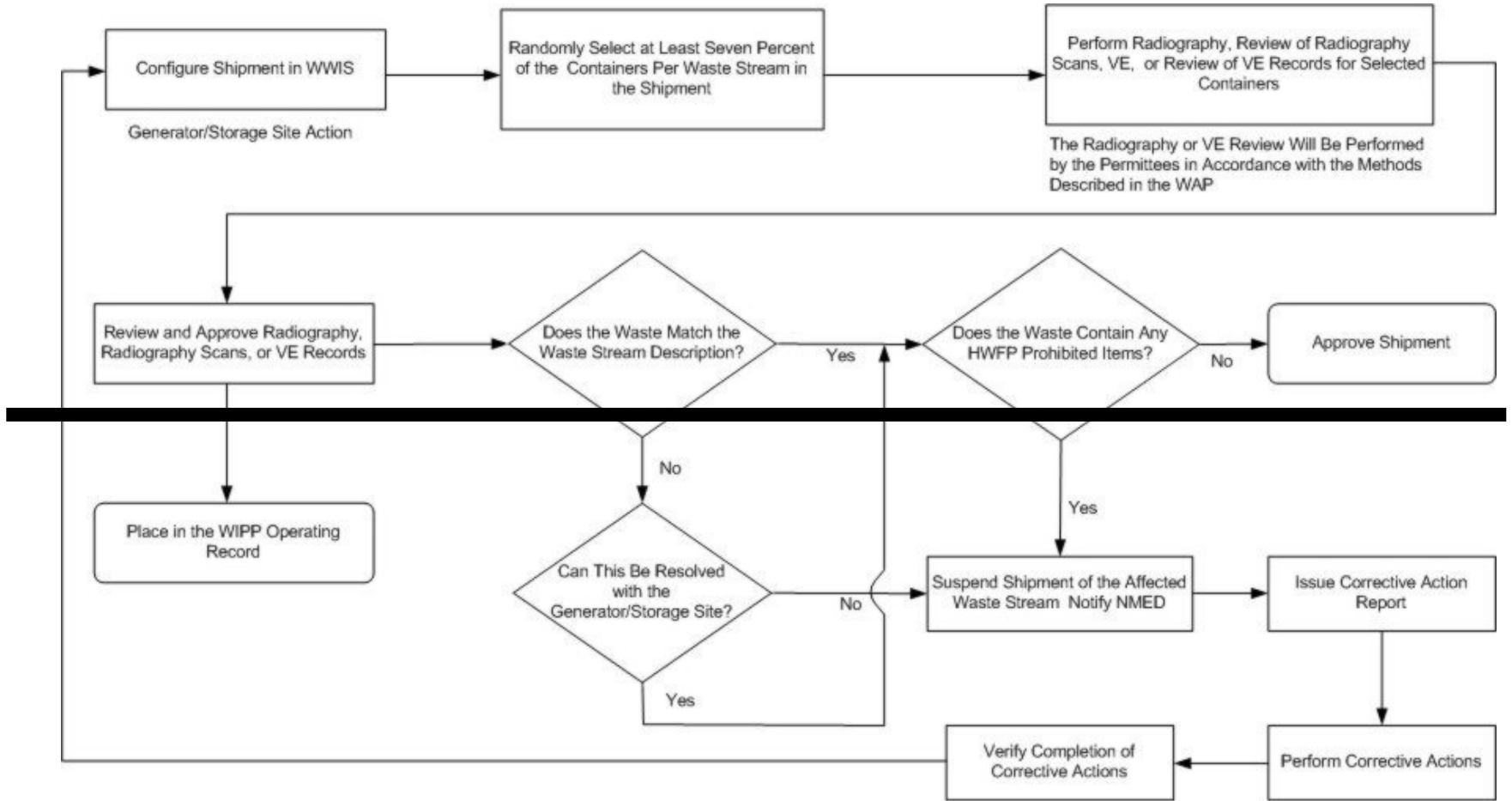
27   If a generator/storage site certifies noncompliant waste more than once during a running 90-day  
28   period, the DOE will suspend acceptance of that site's waste until the DOE finds that all  
29   corrective actions have been implemented and the site complies with all applicable  
30   requirements of the WAP.

31

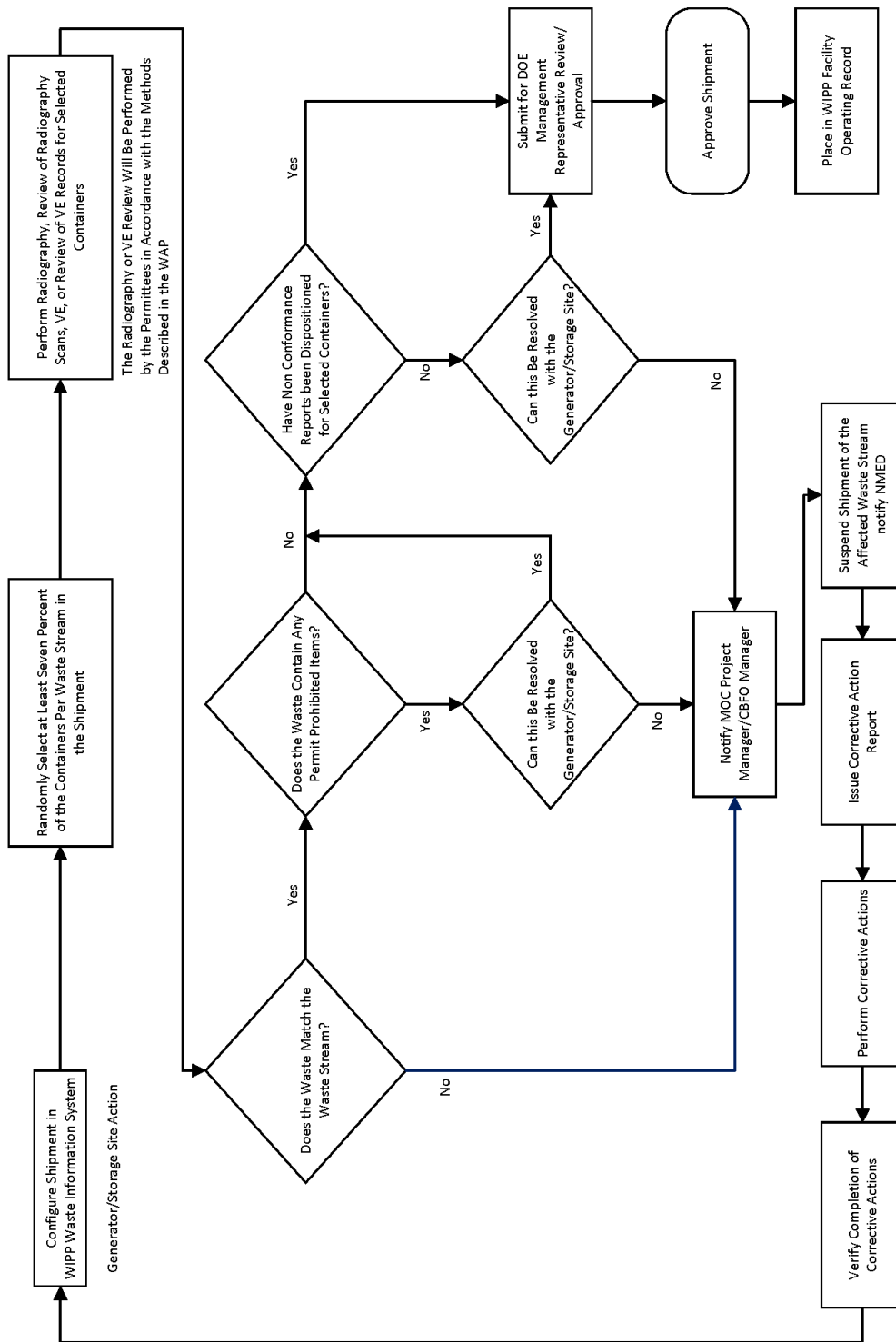
1

## FIGURES

2



**Figure C7-1**  
**Overview of Waste Confirmation**



**Figure C7-1**  
**Overview of Waste Confirmation**

**ATTACHMENT D**  
**RCRA CONTINGENCY PLAN**

## ATTACHMENT D

### RCRA CONTINGENCY PLAN

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## ATTACHMENT D

### RCRA CONTINGENCY PLAN

#### Introduction

This attachment contains the *RCRA Contingency Plan* prepared in accordance with the Resource Conservation and Recovery Act (**RCRA**) requirements codified in 20.4.1.300 New Mexico Administrative Code (**NMAC**) (incorporating Title 40 of the Code of Federal Regulations (**CFR**) Part 262, Subpart M) and 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart D), “Contingency Plan and Emergency Procedures.” The purpose of this document is to define responsibilities and to describe the coordination of activities necessary to minimize hazards to human health and the environment from fires, explosions, or any sudden or non-sudden release of hazardous waste, or hazardous waste constituents to air, soil, or surface water in accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.260(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.51(a)). This plan consists of descriptions of emergency responses specific to contact-handled (**CH**) and remote-handled (**RH**) transuranic (**TRU**) mixed waste and site-generated hazardous waste handled at the WIPP facility.

Pursuant to 20.4.1.300 NMAC (incorporating 40 CFR §262.262(b)), the Permittees ensure that a copy of the *Quick Reference Guide to the WIPP Facility RCRA Contingency Plan* is maintained on file at the facility and is available to the emergency response organizations listed in Section D-2a, *Emergency Response Personnel*, and Section D-9, *Location of the RCRA Contingency Plan and Plan Revision*. Whenever the *RCRA Contingency Plan* is revised, the Permittees will update, if necessary, the quick reference guide and redistribute it in accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.262(c)).

#### D-1 Scope and Applicability

The regulated units at the WIPP facility subject to this permit include the hazardous waste management units (**HWMUs**) including the Waste Handling Building (**WHB**) Container Storage Unit (i.e., **WHB Unit**) and the Parking Area Container Storage Unit (i.e., **Parking Area Unit**), and the hazardous waste disposal units (**HWDUs**) in the underground disposal panels.

Pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.51(a)), owners/operators of treatment, storage, and disposal facilities are required to have formal contingency plans in place that describe actions that facility personnel will take in response to any fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The contingency plan must meet the requirements of NMAC 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart D). The provisions of the *RCRA Contingency Plan* apply to HWDUs in the underground waste disposal panels, HWMUs in the WHB Unit and the Parking Area Unit, the Waste Shaft, and supporting TRU mixed waste handling areas. These areas are shown in Figures D-1 through D-3.

The WIPP facility is a large quantity generator of hazardous waste pursuant to 20.4.1.300 NMAC (incorporating 40 CFR Part 262, “Standards Applicable to Generators of Hazardous Waste”). 20.4.1.300 NMAC (incorporating 40 CFR §262.261(a)) requires that a contingency plan be in place that describes actions that facility personnel will take in response to any fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten

1 human health or the environment. The provisions of ~~the~~this RCRA Contingency Plan also apply  
2 to the site-generated hazardous waste accumulation areas (both the central accumulation areas  
3 (CAAs), also referred to as the less-than-90-day areas, and satellite accumulation areas  
4 (SAAs)), the locations of which are specified in the Quick Reference Guide to the WIPP Facility  
5 RCRA Contingency Plan. For the remainder of this document, the term “site-generated  
6 hazardous waste” will mean waste accumulated in both the CAAs and SAAs.

7 Wastes may also be generated at the WIPP facility as a direct result of managing the TRU and  
8 TRU mixed wastes received from the off-site generators. Throughout the remainder of this plan,  
9 this waste is referred to as “derived waste.” Derived waste will be managed as TRU mixed  
10 waste and emplaced in the rooms in HWDUs along with the TRU mixed waste for disposal.  
11 Every reasonable effort to minimize the amount of derived waste, while providing for the health  
12 and safety of personnel, will be made.

13 Wastes generated as a result of emergency response actions will be categorized into one of  
14 three groups and disposed of accordingly. These are: 1) nonhazardous wastes to be disposed  
15 of at an appropriate disposal facility (e.g., low-level waste facility or approved landfill), 2)  
16 hazardous nonradioactive wastes (site-generated hazardous waste) to be disposed of at an off-  
17 site RCRA permitted facility, and 3) derived waste to be disposed of in the underground HWDUs  
18 as TRU mixed waste. Hazardous liquid wastes that may be generated as a result of emergency  
19 response actions will be managed as follows:

- 20 • Non-Mixed - Accumulated liquids contaminated only with hazardous constituents  
21 will be placed into containers and managed in accordance with 20.4.1.300 NMAC  
22 (incorporating 40 CFR §262.17) requirements. The waste will be shipped to an  
23 approved off-site treatment, storage, or disposal facility.
- 24 • Mixed – Accumulated liquids contaminated with TRU mixed waste will be solidified  
25 and the solidified materials will be disposed of in the underground WIPP repository  
26 as TRU mixed waste.

27 Waste containing liquid in excess of treatment, storage, or disposal facility Waste Acceptance  
28 Criteria (TSDF-WAC) limits shall not be emplaced in the underground HWDUs (See Permit  
29 Attachment C, Section C-1c).

30 Off-site waste managed and disposed of at the WIPP facility is radioactive mixed waste, and as  
31 a result, response to emergencies must consider the dual hazard associated with this waste. In  
32 responding to emergencies involving TRU mixed waste, the actions necessary to protect human  
33 health and the environment from the effects of radioactivity may be similar to those actions  
34 necessary to provide protection from hazardous waste and hazardous waste constituents. Such  
35 responses may require the use of equipment and processes specific to events resulting in  
36 radiological contamination (e.g., continuous air monitors, decontamination shower equipment,  
37 HEPA vacuums, paint/fixatives) and are not included in the RCRA Contingency Plan.  
38 Furthermore, the RCRA Contingency Plan may require additional actions to be taken to mitigate  
39 the hazards associated with the hazardous component of the waste. These measures are not  
40 intended to replace actions required to protect human health and the environment in response  
41 to radiological emergencies. In this manner, the RCRA Contingency Plan complements the  
42 radiological response activities.

## 1 D-2 Emergency Response Personnel and Training

### 2 D-2a Emergency Response Personnel

3 A RCRA Emergency Coordinator will be on-site at the WIPP facility 24 hours a day, seven days  
4 a week, with the responsibility for coordinating emergency response measures. In accordance  
5 with 20.4.1.300 NMAC (incorporating 40 CFR §262.261(d)) and 20.4.1.500 NMAC  
6 (incorporating 40 CFR §264.52(d)), qualified RCRA Emergency Coordinators are listed in Table  
7 D-1 and are trained to the requirements found in Permit Attachment F, Table F-2, under  
8 “Emergency Coordinator.”

9 ~~In addition, persons~~Persons qualified to act as the RCRA Emergency Coordinator have the  
10 authority to commit the necessary resources to implement this *RCRA Contingency Plan*.

11 During emergencies, the RCRA Emergency Coordinator has three primary responsibilities:

- 12 • **Assess the Situation**—The RCRA Emergency Coordinator shall gather information  
13 relevant to the incident, such as the type of event, quantity and type of released  
14 waste, and existing or potential hazards to human health and the environment.
- 15 • **Protect Personnel**—The RCRA Emergency Coordinator shall take reasonable  
16 measures to ensure the safety of personnel, such as ensuring that alarms have  
17 been activated, personnel have been accounted for, any injuries have been  
18 attended to, and evacuation of personnel has occurred, if necessary.
- 19 • **Contain the Release**—The RCRA Emergency Coordinator shall take reasonable  
20 measures to ensure that fires, explosions, or releases of hazardous waste or  
21 hazardous waste constituents do not occur, recur, or spread.

22 In addition to the RCRA Emergency Coordinator, the following individuals, groups, and  
23 organizations have ~~specified~~ responsibilities during any WIPP facility emergency, which may  
24 include the following:

- 25 • WIPP Fire Department—The primary providers of fire suppression, technical  
26 rescue, Emergency Medical Services (EMS), and hazardous materials response  
27 for the protection of personnel in both surface and underground facilities. The  
28 WIPP Fire Department personnel serve as an Industrial Fire Brigade and are  
29 trained to respond to surface and underground emergencies on site, including fires,  
30 medical emergencies, and releases of hazardous materials.
- 31 • Facility Shift Manager (FSM)—A member of the Facility Operations organization  
32 who is in charge of plant operations and is the senior shift representative  
33 responsible for maintaining the facility in a safe configuration during normal and  
34 abnormal conditions. The FSM can concurrently serve as the RCRA Emergency  
35 Coordinator, if trained to the requirements of Permit Attachment F (Facility  
36 Personnel Permit Training Program); or provide support to the qualified RCRA  
37 Emergency Coordinator on shift.
- 38 • Central Monitoring Room Operator (CMRO)—An on-shift operator responsible for  
39 Central Monitoring Room (CMR) operations, including coordination of facility

1 communications. The CMRO documents these activities (e.g., communications,  
2 notifications) in a facility log. The CMRO is a member of Facility Operations, and  
3 during emergencies, the CMRO supports the RCRA Emergency Coordinator.

- 4 • Firefighter—A WIPP Fire Department member who serves as a primary responder  
5 to surface and underground emergencies, including fires, medical emergencies,  
6 and releases of hazardous materials. Firefighters assigned to the underground will  
7 not perform any coordinated firefighting underground and will only respond to  
8 incipient-stage fires that threaten TRU mixed waste, if it is safe to do so.
  
- 9 • Fire Department Incident Commander—Upon delegation by the RCRA Emergency  
10 Coordinator, and once incident command has been established, the Incident  
11 Commander is responsible for direction and supervision of emergency responders  
12 during an incident resulting in implementation of the *RCRA Contingency Plan*. The  
13 Incident Commander will be a member of the WIPP Fire Department. For security-  
14 related incidents that invoke implementation of the *RCRA Contingency Plan*, the  
15 Fire Department Incident Commander will establish a unified command with the  
16 WIPP Protective Force.
  
- 17 • Mine Rescue Team (MRT)— The MRT emergency response capabilities include  
18 search, rescue, reentry, and recovery operations. The MRT responds in  
19 accordance with the requirements of 30 CFR Part 49. The MRT emergency  
20 response actions include extinguishing incipient stage fires, if encountered, and  
21 immediately reporting uncontrolled fires.
  
- 22 • Emergency Operations Center (EOC) Staff- Upon activation, the EOC supports the  
23 RCRA Emergency Coordinator and Incident Commander with emergency  
24 management decision-making and associated notifications. Since EOC staff  
25 performs duties similar to their normal job functions during an emergency response  
26 and provides support related to their area(s) of expertise, no specific RCRA  
27 training is required.

#### 28 D-2b Emergency Response Training

29 The WIPP Fire Department personnel are trained in accordance with the *WIPP Fire Department*  
30 *Training Plan*, which is kept on file at the WIPP facility. The training plan incorporates current  
31 National Fire Protection Association (**NFPA**) standards for training Firefighters.

32 Fire Department Incident Commanders are also trained in accordance with the *WIPP Fire*  
33 *Department Training Plan*, which incorporates the Federal Emergency Management Agency  
34 (**FEMA**), Incident Command System (**ICS**), and the National Incident Management System  
35 (**NIMS**) standards.

36 WIPP personnel who perform EMS duties are licensed through the State of New Mexico  
37 Emergency Medical Systems Bureau. Licensure requirements for training, continuing education,  
38 and skills maintenance are set forth through state requirements. Licenses are maintained by  
39 attending training seminars or conferences.

40 As described above, emergency response training is conducted in accordance with the *WIPP*  
41 *Fire Department Training Plan*, which is updated whenever the applicable standards are

1 revised. In addition to the emergency response training, WIPP Fire Department personnel are  
2 required to complete applicable site-specific training, which is described in Permit Attachment F,  
3 *Facility Personnel Permit Training Program*.

#### 4 D-3 Criteria for Implementation of the RCRA Contingency Plan

5 The provisions of the *RCRA Contingency Plan* shall be implemented immediately whenever  
6 there is a fire, an explosion, or a release of hazardous wastes or hazardous waste constituents  
7 that could threaten human health or the environment, or whenever the potential for such an  
8 event exists as determined by the RCRA Emergency Coordinator, as required under 20.4.1.300  
9 NMAC (incorporating 40 CFR §262.260(b)) and 20.4.1.500 NMAC (incorporating 40 CFR  
10 §264.51(b)).

11 There may be situations ~~which~~that do not readily lend themselves to an immediate assessment  
12 of the possible hazards to human health and the environment. In these cases, the RCRA  
13 Emergency Coordinator will implement the *RCRA Contingency Plan* as a precautionary  
14 measure, regardless of the emergency situation or occurrence, if the RCRA Emergency  
15 Coordinator has reason to believe that a fire, explosion, or release of hazardous waste or  
16 hazardous waste constituents has occurred that could threaten human health or the  
17 environment.

18 In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.265(i)) and 20.4.1.500 NMAC  
19 (incorporating 40 CFR §264.56(i)), the RCRA Emergency Coordinator, on behalf of the  
20 Permittees, will record the time, date, and details of the incident that required implementation of  
21 the *RCRA Contingency Plan*. The Secretary of the NMED will be immediately notified by the  
22 Permittees. Additionally, the Permittees shall submit a written report to the NMED within 15  
23 days of the incident, as specified in Section D-5. The following emergency situations, as they  
24 pertain to TRU mixed waste and generated hazardous wastes, warrant immediate  
25 implementation of the *RCRA Contingency Plan* by the RCRA Emergency Coordinator in  
26 accordance with standard operating procedures on file at the WIPP facility:

- 27 • Fires
- 28 - If a fire involving TRU mixed waste or site-generated hazardous waste occurs
- 29 - If a fire (e.g., building, grass, nonhazardous waste fire) occurs within or near a CAA or
- 30 SAA that threatens to involve site-generated hazardous waste
- 31 - If a fire (e.g., building, grass, nonhazardous waste fire) occurs within or near the
- 32 permitted HWMUs that threatens to involve TRU mixed waste
- 33 - If a fire occurs in the underground that results in immediate personnel evacuation or
- 34 prevents normal personnel access to the underground

35 For any fire ~~which~~that does not meet the above criteria, the RCRA Emergency Coordinator  
36 shall document the rationale for not implementing the *RCRA Contingency Plan* (e.g., there is  
37 no threat to human health or the environment).

- 38 • Explosions

- 1 - If an explosion involving TRU mixed waste or site-generated hazardous waste occurs
- 2 - If an explosion occurs within or near a CAA or SAA ~~which~~that threatens to involve site-
- 3 generated hazardous waste
- 4 - If an explosion occurs within or near the permitted HWMUs ~~which~~that threatens to
- 5 involve TRU mixed waste
- 6 - If an explosion occurs in the underground that results in immediate personnel evacuation
- 7 or prevents normal personnel access to the underground
- 8 - If there is an imminent danger of an explosion occurring (e.g., gas leak with an ignition
- 9 source nearby) which could involve TRU mixed or site-generated hazardous waste

10 For any explosion ~~which~~that does not meet the above criteria, the RCRA Emergency  
11 Coordinator shall document the rationale for not implementing the *RCRA Contingency Plan*  
12 (e.g., there is no threat to human health or the environment).

13 • Unplanned Sudden/Non-Sudden Releases

- 14 - If, prior to waste emplacement, one or more containers of TRU mixed waste has spilled
- 15 or been breached due to dropping, puncturing, container failure or degradation, or any
- 16 other physical or chemical means, resulting in a release
- 17 - If, after waste emplacement, one or more containers of TRU mixed waste in an active
- 18 room has been breached
- 19 - If a continuous air monitor confirms a release of radioactive particulates to the ambient
- 20 atmosphere, indicating a possible release of TRU mixed waste constituents from the
- 21 permitted facility
- 22 - If a spill of site-generated hazardous waste occurs in a CAA or SAA and cannot be
- 23 contained with secondary containment methods or absorbents, thereby threatening a
- 24 release to air, soil, or surface water
- 25 - If a site-generated hazardous waste spill occurs in a CAA or SAA and results in the
- 26 release of potentially flammable material, thereby threatening to create a fire or
- 27 explosion hazard
- 28 - If a site-generated hazardous waste spill occurs in a CAA or SAA and results in the
- 29 release of potentially toxic fumes that ~~would~~could threaten human health

30 For any release of hazardous waste or hazardous waste constituents that does not meet the  
31 above criteria, the RCRA Emergency Coordinator shall document the rationale for not  
32 implementing the *RCRA Contingency Plan* (e.g., there is no threat to human health or the  
33 environment).

34 • Other Occurrences



- 1 - If a natural phenomenon (e.g., earthquake, flood, lightning strike, tornado) occurs that  
2 involves TRU mixed waste or site-generated hazardous waste or threatens to involve  
3 TRU mixed waste or site-generated hazardous waste
  
- 4 - If an underground structural integrity emergency (e.g., roof fall in an active room) occurs  
5 that involves TRU mixed waste or site-generated hazardous waste, threatens to involve  
6 TRU mixed waste or site-generated hazardous waste, results in immediate personnel  
7 evacuation, or prevents normal personnel access to the underground

8 For any natural phenomenon or underground structural emergency that does not meet the  
9 above criteria, the RCRA Emergency Coordinator shall document the rationale for not  
10 implementing the *RCRA Contingency Plan* (e.g., there is no threat to human health or the  
11 environment).

#### 12 D-4 Emergency Response Method

13 Methods that describe implementation of the *RCRA Contingency Plan* cover the following six  
14 areas:

- 15 1. *Immediate Notifications* (Section D-4a)
- 16
- 17 2. *Identification of Released Materials and Assessment of Extent of the Emergency*  
18 (Section D-4b)
- 19
- 20 3. *Assessment of the Potential Hazards* (Section D-4c)
- 21
- 22 4. *Post-Assessment Notifications* (Section D-4d)
- 23
- 24 5. *Control and Containment of the Emergency* (Section D-4e)
- 25
- 26 6. *Post-Emergency Activities* (Section D-4f)
- 27

#### 28 D-4a Immediate Notifications

29 Notification requirements in the event of implementation of the *RCRA Contingency Plan* are  
30 defined by 20.4.1.300 NMAC (incorporating 40 CFR §262.265(a)) and 20.4.1.500 NMAC  
31 (incorporating 40 CFR §§264.56(a)). Personnel at the WIPP facility are trained to respond to  
32 emergency notifications.

33 Whenever an emergency situation occurs that warrants implementation of this *RCRA*  
34 *Contingency Plan*, as described in Section D-3, the Permittees will immediately notify the  
35 Secretary of the NMED.

1 D-4a(1) Initial Emergency Response and Alerting the RCRA Emergency Coordinator

2 The first person to become aware of an incident shall immediately report the situation to the  
3 CMRO and, as requested by the CMRO, provide the relevant information. Facility personnel are  
4 trained in the process for notifying the CMRO as part of General Employee Training (**GET**).

5 In addition to receiving incident reports from facility personnel, the CMRO ~~continuously~~  
6 ~~(24 hours a day)~~ 24 hours a day, takes telephone calls and radio  
7 messages, initiates calls to emergency staff, and initiates emergency response procedures  
8 regarding evacuation, if needed.

9 Once the CMRO is notified of a fire, explosion, or a release anywhere in the facility (either by  
10 eyewitness notification or an alarm), the RCRA Emergency Coordinator is immediately notified.  
11 The RCRA Emergency Coordinator ensures that the emergency responders, including the  
12 WIPP Fire Department and the MRT, have been notified, as needed. Once incident command  
13 has been established, the RCRA Emergency Coordinator has the authority to delegate the  
14 responsibilities for mitigation of the incident to the Incident Commander.

15 The response to an unplanned event will be performed in accordance with standard operating  
16 procedures and guides based on the applicable ~~Federal~~federal, ~~State~~state, or local regulations  
17 and/or guidelines for that response. These include DOE Order 151.1D, *Comprehensive*  
18 *Emergency Management System*; the U.S. Mine Safety and Health Administration (**MSHA**); the  
19 NMAC; the *Comprehensive Environmental Response, Compensation, and Liability Act*;  
20 *Chapter 74, Article 4B, New Mexico Statutes Annotated 1978*; and the *New Mexico Emergency*  
21 *Management Act*.

22 If needed, the RCRA Emergency Coordinator will immediately notify the appropriate federal,  
23 state, and local agencies and mining companies in the vicinity of the WIPP facility, listed in  
24 Section D-7, with designated response roles.

25 Depending on the emergency, the EOC may be activated for additional support. In the event  
26 that the EOC is activated, decision-making responsibilities related to emergency management  
27 and associated notifications may be delegated to the EOC by the RCRA Emergency  
28 Coordinator. The EOC will assist in the mitigation of the incident with the use of appropriate  
29 communications equipment and technical expertise from available resources. During the  
30 emergency, the RCRA Emergency Coordinator will remain in contact with and advise the EOC  
31 of the known hazards.

32 The EOC staff assesses opportunities for coordination and the use of mutual-aid agreements  
33 with local agencies making additional emergency personnel and equipment available (Section  
34 D-7), as well as the use of specialized response teams available through various ~~State~~state and  
35 ~~Federal~~federal agencies. Because the WIPP facility is a DOE-owned facility, the Permittees may  
36 also use the resources available from the *National Response Framework*.



1 D-4a(2) Communication of Emergency Conditions to Facility Employees

2 Procedures for immediately notifying facility personnel of emergencies are as follows:

3 • Local Fire Alarms

4 The local fire alarms sound an audible tone and may be activated automatically or  
5 manually in the event of a fire.

6 • Surface Evacuation Signal

7 The evacuation signal is a yelp tone and is manually activated by the CMRO when  
8 needed. The CMRO follows the evacuation signal with verbal instructions and ensures  
9 the Site Notification System has been activated.

10 • Underground Evacuation Warning System

11 The underground evacuation signal is a yelp tone and flashing strobe light. In the  
12 event of an evacuation signal, underground personnel will follow escape routes to  
13 egress hoist stations. Underground personnel are trained to report to the underground  
14 assembly areas and await further instruction if ~~all~~ power fails or if ventilation stops. If  
15 evacuation of underground personnel is required ~~due to a power failure, this will be~~  
16 ~~done using the a~~ backup generators ~~is available to power the hoisting equipment.~~  
17 Evacuation will be in accordance with the applicable requirements of MSHA.

18 WIPP facility personnel are trained and given instruction during GET to recognize the various  
19 alarm signals and the significance of each alarm. WIPP facility employees and site visitors are  
20 required to comply with directions from emergency personnel and alarm system notifications  
21 and to follow instructions concerning emergency equipment, shutdown procedures, and  
22 emergency evacuation routes and exits.

23 D-4b Identification of Released Materials and Assessment of the Extent of the Emergency

24 The identification of hazardous wastes or hazardous waste constituents involved in a fire, an  
25 explosion, or a release to the environment is a necessary part of the RCRA Emergency  
26 Coordinator's assessment of an incident, as described in 20.4.1.300 NMAC (incorporating 40  
27 CFR §262.265(b)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(b)). Immediately after  
28 alarms have been activated and required notifications have been made, the RCRA Emergency  
29 Coordinator shall direct an investigation to determine pertinent information relevant to the actual  
30 or potential threat posed to human health or the environment. The information will include the  
31 character, exact source, amount, and areal extent of any released material. This may be done  
32 by observation or review of facility records or manifests and, if necessary, by chemical analysis.

33 The identification of the character and source of released materials at any location is enhanced  
34 because hazardous wastes are stored, managed, or disposed at specified locations throughout  
35 the WIPP facility.

36 Sources of information available to identify the hazardous wastes involved in a fire, an  
37 explosion, or a release at the WIPP facility include operator/supervisor knowledge of their work  
38 areas, materials used, and work activities underway; the WIPP Waste Information System

1 (WWIS), which identifies the location within the facility of emplaced TRU mixed waste, including  
2 emplaced derived waste; and waste manifests and other waste characterization information in  
3 the ~~operating record~~Operating Record. The WWIS also includes information on wastes that are  
4 in the waste handling process. Also available are Safety Data Sheets (SDSs) for hazardous  
5 materials in the various user areas throughout the facility, waste acceptance records, and  
6 materials inventories for buildings and operating groups at the WIPP facility. Information or data  
7 from the derived waste accumulation areas, the site-generated hazardous waste accumulation  
8 areas, and nonregulated waste accumulation areas are included. It is anticipated that this  
9 information is sufficient for identifying the nature and extent of the released materials. The  
10 RCRA Emergency Coordinator has access to this information when needed.

11 The waste received at the WIPP facility must meet the TSDF-WAC (e.g., no more than one  
12 percent liquid), which minimizes the possibility of waste container degradation and liquid spills.  
13 Should a spill or release occur from a container of site-generated hazardous or TRU mixed  
14 waste, following an initial assessment of the event, the RCRA Emergency Coordinator will  
15 ensure that the following actions are immediately taken, consistent with radiological control  
16 procedures, in compliance with 20.4.1.300 NMAC (incorporating 40 CFR §262.261(a)) and  
17 20.4.1.500 NMAC (incorporating 40 CFR §264.52(a) and §264.171):

- 18 • Assemble the required response equipment, such as protective clothing and gear, heavy  
19 equipment, empty drums, overpack drums, hand tools, and absorbent materials
- 20 • Transfer the released material to a container that is in good condition and patch or  
21 overpack the leaking container into another container that is in good condition
- 22 • Once the release has been contained, determine the areal extent of the release and  
23 proceed with appropriate cleanup action, such as chemical neutralization, vacuuming, or  
24 excavation

#### 25 D-4c Assessment of the Potential Hazards

26 Concurrent with the actions described in Sections D-4a and D-4b, and in accordance with  
27 20.4.1.300 NMAC (incorporating 40 CFR §262.265(c)) and 20.4.1.500 NMAC (incorporating 40  
28 CFR §264.56(c)), the RCRA Emergency Coordinator shall assess possible hazards to human  
29 health or the environment that may result from the release, fire, or explosion. This assessment  
30 will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of  
31 any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous  
32 surface water run-off from water or chemical agents used to control fire and heat-induced  
33 explosions). The RCRA Emergency Coordinator will be responsible for identifying and  
34 responding to immediate and potential hazards, using the services of trained personnel.

35 After the materials involved in an emergency are identified, the specific information (e.g.,  
36 associated hazards, appropriate personal protective equipment (**PPE**), decontamination) may  
37 be obtained from SDSs and from appropriate chemical reference materials at the same location.  
38 These information sources are available to the RCRA Emergency Coordinator or may be  
39 accessed through several WIPP facility organizations.

40 If, upon completion of the hazards assessment, the RCRA Emergency Coordinator determines  
41 that there are no actual or potential hazards to human health or the environment present, this  
42 *RCRA Contingency Plan* may be terminated. The RCRA Emergency Coordinator will record the

1 time, date, and details of the incident in the ~~operating record~~Operating Record, and the  
2 Permittees will ensure that the reporting requirements of Section D-5 are fulfilled.

### 3 D-4d Post-Assessment Notifications

4 Upon *RCRA Contingency Plan* implementation, post-assessment notifications may be  
5 necessary in order to satisfy 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)) and  
6 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)). If it has been determined that the facility  
7 has had a fire, an explosion, or a release of hazardous waste or hazardous waste constituents  
8 that could threaten human health or the environment outside the facility (i.e., outside the Land  
9 Withdrawal Boundary), the RCRA Emergency Coordinator, after consultation with the DOE as  
10 the owner of the facility, will ensure that the appropriate local authorities are immediately notified  
11 by telephone and/or radio in the event that evacuation is needed. The following notifications  
12 satisfy the requirements of 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)(1)) and  
13 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(1)):

- 14 • New Mexico Department of Homeland Security and Emergency Management (telephone  
15 number: (505) 476-9635)
- 16
- 17 • Eddy County via the Regional Emergency Dispatch Authority (telephone number: (575)  
18 616-7155)
- 19
- 20 • Lea County via the Regional Emergency Dispatch Authority (telephone number: (575)  
21 397-9265)

22 The RCRA Emergency Coordinator must be available to help appropriate officials decide  
23 whether local areas should be evacuated.

24 After local authorities are notified, the RCRA Emergency Coordinator must immediately notify  
25 either the government official designated as the on-scene coordinator for that geographical  
26 area, or the National Response Center. For the purposes of the *RCRA Contingency Plan*, the  
27 following notifications satisfy the requirements of 20.4.1.300 NMAC (incorporating 40 CFR  
28 §262.265(d)(2)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(2)):

- 29 • New Mexico Environment Department (NMED)  
30 Department of Public Safety  
31 24-Hour Emergency Reporting Telephone Number: (505) 827-9329  
32 FAX number: (505) 827-9368  
33
- 34 • National Response Center  
35 Telephone number: 1-800-424-8802  
36 FAX number: (202) 479-7181

37 This notification shall include the following information:

- 38 • The name and phone number of the reporter
- 39 • The name and address of the facility

- 1       • The type of incident (fire, explosion, or release)
- 2       • The date and time of the incident
- 3       • The name and quantity of material(s) involved, to the extent known
- 4       • The extent of injuries, if any
- 5       • Possible hazards to human health and the environment (air, soil, water, wildlife, etc.)
- 6       outside the facility

7       Communications beyond those required by the *RCRA Contingency Plan* are the responsibility of  
8       the Permittees in accordance with plans and policies on file at the WIPP facility.

9       D-4e Control and Containment of the Emergency

10       The RCRA Emergency Coordinator is required to ensure control of an emergency and to  
11       minimize the potential for the occurrence, recurrence, or spread of releases due to the  
12       emergency situation, as described in 20.4.1.300 NMAC (incorporating 40 CFR §262.265(e) and  
13       (f)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56-(e) and (f)). Standard operating  
14       procedures and guides are used to implement initial response measures with priority being  
15       control of the emergency, and those actions necessary to ensure confinement and containment  
16       in the early, critical stages of a spill or leak. The RCRA Emergency Coordinator, in conjunction  
17       with the Incident Commander, is responsible for implementing the following measures:

- 18       • Stopping processes and operations
- 19       • Collecting and containing released wastes and materials
- 20       • Removing or isolating containers of hazardous waste posing a threat
- 21       • Ensuring that wastes managed during an emergency are handled, stored, or treated with  
22       due consideration for compatibility with other wastes and materials on site and with  
23       containers utilized (Section D-4f(2))
- 24       • Restricting personnel not needed for response activities from the scene of the incident
- 25       • Evacuating the area
- 26       • Curtailing nonessential activities in the area
- 27       • Conducting preliminary inspections of adjacent facilities and equipment to assess  
28       damage
- 29       • Maintaining fire equipment on standby at the incident site in cases where ignitable  
30       liquids have been or may be released and ensuring that ignition sources are kept out of  
31       the area. Ignitable liquids will be segregated, contained, confined, diluted, or otherwise  
32       controlled to preclude inadvertent explosion or detonation.

1 No operation that has been shut down in response to the incident will be restarted until  
2 authorized by the RCRA Emergency Coordinator. If a release occurs that involves radioactivity,  
3 the RCRA Emergency Coordinator actions will be consistent with radiation control policies and  
4 practices.

5 The standard operating procedures for emergency response may include, but are not limited to,  
6 the following actions appropriate for control of releases:

- 7 1. Isolating the area from unauthorized entry by fences, barricades, warning signs, or  
8 other security and site control precautions. Isolation and evacuation distances vary,  
9 depending upon the chemical/product, fire, and weather situations.
- 10 2. Establishing drainage controls.
- 11 3. Stabilizing physical controls (such as dikes or impoundment[s]).
- 12 4. Capping contaminated soils to reduce migration.
- 13 5. Using chemicals and other materials to retard the spread of the release or to mitigate  
14 its effects.
- 15 6. Excavating, consolidating, or removing contaminated soils.
- 16 7. Removing wastes containers to reduce exposure risk during situations such as fires.

17 If the facility stops operations in response to a fire, explosion, or release, the RCRA Emergency  
18 Coordinator shall ensure continued monitoring for leaks, pressure buildup, gas generation, or  
19 ruptures in valves, pipes, or other equipment, wherever appropriate.

20 Natural and/or synthetic methods will be employed to limit the releases of hazardous- wastes or  
21 hazardous waste constituents so that effective recovery and treatment can be accomplished  
22 with minimal additional risk to human health or the environment.

23 Emergency response actions taken to mitigate releases may include, but are not limited to, the  
24 following:

- 25 1. Physical methods of control may involve any of several processes to reduce the area  
26 of the spill/leak, or other release mechanism (such as fire suppression).
  - 27 a. Absorption (e.g., absorbent sheets; spill control bucket materials specifically for  
28 solvents, neutralization, or acids/caustics; and absorbent socks for general liquids  
29 or oils)
  - 30 b. Dikes or Diversions (e.g., absorbent socks or earth)
  - 31 c. Overpacking
  - 32 d. Plug and Patch

1 e. Transfers from leaking container to new container f. Vapor Suppression (e.g.,  
2 aqueous foam blanket)

3 2. Chemical methods of mitigation may include the following:

4 a. Neutralization

5 b. Solidification

6 Once the Incident Commander informs the RCRA Emergency Coordinator that the emergency  
7 scene is stable, the release has been stopped, any reactions have been controlled, the released  
8 hazardous materials have been contained within a localized area, and the area of contamination  
9 has been secured from unauthorized entry, the field emergency response activity can be  
10 terminated.

11 D-4e(1) Fires

12 In the event of a fire that involves or threatens TRU mixed waste or site-generated hazardous  
13 waste, emergency response actions may include, but are not limited to, the following:

14 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident  
15 Commander of the known hazards.

16 2. The Incident Commander will maintain overall control of the emergency and may  
17 accept and evaluate the advice of WIPP facility personnel and emergency response  
18 organization members, but retains overall responsibility until the emergency is  
19 terminated.

20 3. Only fire extinguishing materials that are compatible with the materials involved in the  
21 fire will be used to extinguish fires. Water and dry chemical materials in use at the  
22 WIPP facility have been determined to be compatible with ~~all~~ components of the TRU  
23 mixed waste and site-generated hazardous waste.

24 4. In order to ensure that storm drains and/or sewers do not receive potentially  
25 hazardous runoff, dikes will be built around storm drains to control discharge as  
26 needed. Collected waste will be sampled and analyzed for hazardous constituents,  
27 and appropriately disposed.

28 5. The RCRA Emergency Coordinator will ensure that measures are taken to shut down  
29 operational units (e.g., process equipment and ventilation equipment) that have been  
30 affected directly or indirectly by the fire.

31 6. Fire suppression materials used in response to incidents will be retained on-scene,  
32 where an evaluation will be performed to determine appropriate recovery and disposal  
33 methods.

34 7. Upon underground evacuation due to a fire in the underground that involves or  
35 threatens to involve TRU mixed waste or site-generated hazardous waste, a response  
36 plan will be developed depending on the status of the fire. The plan may include

1 ventilation control, barrier erection, and/or waiting for the fire to self-extinguish or  
2 implement active ventilation.

### 3 D-4e(2) Explosions

4 In the event of an explosion that involves or threatens TRU mixed waste or site-generated  
5 hazardous waste, emergency response actions may include, but are not limited to, the following:

- 6 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident  
7 Commander of the known hazards.
- 8 2. The Incident Commander will maintain overall control of the emergency and may  
9 accept and evaluate the advice of WIPP facility personnel and emergency response  
10 organization members, but retains overall responsibility until the emergency is  
11 terminated.
- 12 3. The RCRA Emergency Coordinator will ensure measures are taken to shut down  
13 operational units (e.g., process equipment and ventilation equipment) that have been  
14 affected directly or indirectly by the explosion.
- 15 4. If, following an explosion, there is an ensuing fire, see Section D-4e(1).
- 16 5. If, following an explosion, there is an underground structural integrity emergency, see  
17 Section D-4e(4).

### 18 D-4e(3) Unplanned Sudden/Non-Sudden Releases

#### 19 Spills of Site-Generated Hazardous Waste

20 If a spill of site-generated hazardous waste has occurred, and 1) the spill cannot be contained  
21 with secondary containment methods or absorbents, 2) the spill causes a release of flammable  
22 material, or 3) the spill results in toxic fumes, the RCRA Emergency Coordinator will ensure  
23 implementation of measures that may include, but are not limited to, the following actions:

- 24 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident  
25 Commander of the known hazards.
- 26 2. The Incident Commander will maintain overall control of the emergency and may  
27 accept and evaluate the advice of WIPP facility personnel and emergency response  
28 organization members, but retains overall responsibility until the emergency is  
29 terminated.
- 30 3. The immediate area will be evacuated.
- 31 4. The source of the release will be mitigated, if possible.
- 32 5. A dike to contain runoff will be built, if necessary.
- 33 6. Dikes around storm drains to control discharge will be built, as needed, to ensure that  
34 storm drains and/or sewers do not receive potentially hazardous runoff.



1 7. Fire equipment will be maintained on standby at the incident site in cases where  
2 ignitable liquids have been or may be released, and ignition sources will be kept out of  
3 the area of ignitable liquids.

4 8. Released waste and contaminated media will be collected and placed into drums or  
5 other appropriate containers.

#### 6 Releases of TRU Mixed Waste

7 If a release of TRU mixed waste has occurred, the emergency will be managed as a potential  
8 radiological release, and radiological control measures will determine the activities that can be  
9 performed safely, which may include the following:

10 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident  
11 Commander of the known hazards.

12 2. The Incident Commander will maintain overall control of the emergency and may  
13 accept and evaluate the advice of WIPP facility personnel and emergency response  
14 organization members, but retains overall responsibility until the emergency is  
15 terminated.

16 3. Prior to the re-entry following an event involving containers that are managed as TRU  
17 mixed waste, a Radiological Work Permit (**RWP**) will be prepared.

18 4. During the re-entry phase, the extent of radiological contamination will be determined.  
19 This information is used by the RCRA Emergency Coordinator to determine an  
20 appropriate course of action to recover the area.

21 5. During the recovery phase, the ~~necessary~~ resources to conduct decontamination  
22 and/or overpacking operations will be used as needed.

23 6. Prior to returning the affected area and/or equipment to normal activities, the RCRA  
24 Emergency Coordinator will determine if additional measures are required by the  
25 *RCRA Contingency Plan* (e.g., characterization and disposal of contaminated media).

26 7. The recovery phase will include activities (e.g., placing the waste material in another  
27 container, vacuuming the waste material, overpacking or plugging/patching the  
28 affected waste container(s), decontaminating or covering the affected area), as  
29 specified in the RWP, to minimize the spread of contamination to other areas.

30 8. The RWPs and other administrative controls will provide protective measures to help  
31 ensure that new hazardous constituents will not be added during decontamination  
32 activities.

#### 33 D-4e(4) Other Occurrences

#### 34 Natural Phenomena

35 In the event of a natural phenomenon (e.g., earthquake, flood, lightning strike, tornado) that  
36 involves hazardous waste or has threatened to cause a release of hazardous waste or



1 hazardous waste constituents, emergency response actions may include, but are not limited to,  
2 the following:

- 3 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident  
4 Commander of the known hazards.
- 5 2. The Incident Commander will maintain overall control of the emergency and may  
6 accept and evaluate the advice of WIPP facility personnel and emergency response  
7 organization members, but retains overall responsibility until the emergency is  
8 terminated.
- 9 3. Containers ~~which~~ that have not been disposed will be inspected for signs of leakage or  
10 damage, and containment systems will be inspected for deterioration.
- 11 4. Affected equipment or areas associated with hazardous waste management activities  
12 will be inspected, and the operability of monitoring systems will be ensured.
- 13 5. Affected electrical equipment and lines will be inspected for damage.
- 14 6. Affected buildings and fencing directly related to hazardous waste management  
15 activities will be inspected for damage.
- 16 7. A general survey of the site will be conducted to check for signs of physical damage.
- 17 8. The RCRA Emergency Coordinator will ensure that measures are taken to shut down  
18 operational units (e.g., process equipment and ventilation equipment) that have been  
19 affected by the natural phenomenon.

#### 20 Underground Structural Integrity Emergencies

21 In the event of an underground structural integrity emergency that involves or threatens TRU  
22 mixed waste (i.e., occurs in an active disposal room) or site-generated hazardous waste, the  
23 emergency will be managed as a potential radiological release, and radiological control  
24 measures will determine the activities that can be performed safely, and may include the  
25 following:

- 26 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident  
27 Commander of the known hazards.
- 28 2. The Incident Commander will maintain overall control of the emergency and may  
29 accept and evaluate the advice of WIPP facility personnel and emergency response  
30 organization members, but retains overall responsibility until the emergency is  
31 terminated.
- 32 3. The RCRA Emergency Coordinator will ascertain whether the roof conditions allow for  
33 safe entry and if the waste container or containers in question are accessible.
- 34 4. The RCRA Emergency Coordinator may recommend closing the entire panel, or the  
35 affected room of waste containers, based on the location of the event and the stability

1 of the roof and walls in the panel as a method to ensure that measures are taken to  
2 shut down affected operational units.

- 3 5. Access to the ventilation flow path downstream of the incident will be restricted, as  
4 appropriate.
- 5 6. Ventilation to the affected room will be restricted to ensure that there is no spread of  
6 contamination that may have been released, as appropriate.
- 7 7. Accessible containers will be inspected for signs of leakage or damage.
- 8 8. The spill area will be covered with material (e.g., plastic, fabric sheets) in a manner  
9 that safely isolates the contamination in the area.
- 10 9. The RCRA Emergency Coordinator will determine if the covered spill area safely  
11 allows for continued waste disposal operations or whether further action is required to  
12 reinstate operations.

13 D-4f Post-Emergency Activities

14 Immediately after the emergency, and once initial release or spill control and containment have  
15 been completed, the RCRA Emergency Coordinator will ensure that necessary decontamination  
16 occurs and that recovered hazardous waste is properly managed, stored, and/or disposed, as  
17 required by 20.4.1.300 NMAC (incorporating 40 CFR §262.265(g)) and 20.4.1.500 NMAC  
18 (incorporating 40 CFR §264.56(g)). As required by 20.4.1.300 NMAC (incorporating 40 CFR  
19 §262.265(h)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(h)), the RCRA Emergency  
20 Coordinator will ensure that incompatibility of waste and restoration of emergency equipment  
21 are addressed.

22 D-4f(1) Management and Disposition of Released Material

23 When a release of TRU mixed waste has occurred, priority is given to actions required to  
24 minimize radiological exposure to workers and the public. If the release is TRU mixed waste,  
25 decontamination and disposition will be in accordance with the RWP. If a release of site-  
26 generated hazardous waste occurs, the contaminated surface will be cleaned, and  
27 decontamination materials will be placed in containers and dispositioned appropriately. In most  
28 cases, ~~these~~ actions taken to address a radiological contamination are sufficient to mitigate any  
29 health effects associated with contamination by hazardous waste or hazardous waste  
30 constituents.

31 ~~If a release of site-generated hazardous waste occurs, the contaminated surface will be~~  
32 ~~cleaned, and decontamination materials will be placed in containers and dispositioned~~  
33 ~~appropriately. If the release is TRU mixed waste, decontamination and disposition will be in~~  
34 ~~accordance with the RWP.~~

35 If radioactive contamination is detected on equipment or on structures, radiological cleanup  
36 standards will be used to determine the effectiveness of decontamination efforts and/or the final  
37 disposition of the equipment or structures. Many types of equipment are difficult to  
38 decontaminate and may have to be discarded as derived waste. Fixatives (e.g., paint or water

1 spray on salt in the underground) may be used on contaminated structures if the contamination  
2 cannot be safely removed.

3 Following decontamination, the RCRA Emergency Coordinator will ensure that nonradioactive  
4 hazardous waste resulting from the cleanup of a fire, an explosion, or a release involving a  
5 nonradioactive hazardous waste at the WIPP facility will be contained and managed as a  
6 hazardous waste until such time as the waste is disposed of, or determined to be  
7 nonhazardous, as defined in 20.4.1.200 NMAC (incorporating 40 CFR Part 261, Subparts C and  
8 D). In most cases, knowledge of the material inventories for the various buildings and areas at  
9 the facility will allow a hazardous waste determination for the material resulting from the cleanup  
10 of a release. When knowledge of the material inventories is not sufficient, samples of the waste  
11 will be collected and analyzed using U.S. Environmental Protection Agency (**EPA**)-approved  
12 methods to determine the presence of any hazardous characteristics and/or hazardous waste  
13 constituents.

#### 14 D-4f(2) Incompatible Waste

15 The RCRA Emergency Coordinator will ensure, in accordance with 20.4.1.300 NMAC  
16 (incorporating 40 CFR §262.262(h)(1)) and 20.4.1.500 NMAC (incorporating 40 CFR  
17 §264.56(h)(1)), that in the affected area(s) of the facility, no waste that may be incompatible with  
18 the released material is treated, stored, or disposed of until cleanup has been completed. The  
19 RCRA Emergency Coordinator will not allow hazardous or TRU mixed waste operations to  
20 resume in a building or area in which incompatible materials have been released prior to  
21 completion of necessary post-emergency cleanup operations to remove potentially incompatible  
22 materials. In making the determination of compatibility, the RCRA Emergency Coordinator will  
23 have available the resources and information described in Section D-4b, *Identification of*  
24 *Released Materials and Assessment of the Extent of the Emergency*.

#### 25 D-4f(3) Cleaning and Restoration of Equipment

26 The RCRA Emergency Coordinator will take measures to ensure, in accordance with 20.4.1.300  
27 NMAC (incorporating 40 CFR §262.262(h)(2)) and 20.4.1.500 NMAC (incorporating 40 CFR  
28 §264.56(h)(2)), that in the affected area(s) of the facility, emergency equipment listed in the  
29 *RCRA Contingency Plan*, and used in the emergency response, is cleaned and fit for its  
30 intended use or replaced before operations are resumed.

31 Any equipment that cannot be decontaminated will be discarded as waste (e.g., hazardous,  
32 mixed, solid), as appropriate. After the equipment has been cleaned, repaired, or replaced, a  
33 post-emergency facility and equipment inspection will be performed, and the results will be  
34 documented.

#### 35 D-5 Required Reporting

36 The RCRA Emergency Coordinator, on behalf of the Permittees, will note in the ~~operating~~  
37 ~~record-Operating Record~~ the time, date, and details of the incident that required implementation  
38 of the *RCRA Contingency Plan*. In compliance with 20.4.1.300 NMAC (incorporating 40 CFR  
39 §262.265(i)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i)), within 15 days after the  
40 incident, the Permittees will ensure that a written report on the incident will be submitted to the  
41 Secretary of the NMED. The report will include:

- 1       • The name, address, and telephone number of the Owner/Operator
- 2       • The name, address, and telephone number of the facility
- 3       • The date, time, and type of incident (e.g., fire, explosion, or release)
- 4       • The name and quantity of material(s) involved
- 5       • The extent of injuries, if any
- 6       • An assessment of actual or potential hazards to human health or the environment,  
7        where this is applicable
- 8       • The estimated quantity and disposition of recovered material that resulted from the  
9        incident

#### 10 D-6 Emergency Equipment

11 A variety of equipment is available at the facility for emergency response, containment, and  
12 cleanup operations in the surface HWMUs, the underground HWDUs, and the WIPP facility in  
13 general. This includes equipment for spill control, fire control, personnel protection, monitoring,  
14 first aid and medical attention, communications, and alarms. This equipment is immediately  
15 available to emergency response personnel. A listing of major emergency equipment available  
16 at the WIPP facility, as required by 20.4.1.300 NMAC (incorporating 40 CFR §262.261(e)) and  
17 20.4.1.500 NMAC (incorporating 40 CFR §264.52(e)), is shown in Table D-2. Table D-2 also  
18 includes the location and a physical description of each item on the list along with a brief outline  
19 of its capabilities. The fire-water distribution system map is show in Figure D-5. Equipment  
20 specified at the locations listed in Table D-2 are inspected in accordance with the inspection  
21 schedule specified in Attachment E, Table E-1, as required by 20.4.1.500 NMAC (incorporating  
22 40 CFR §264.15(b)).

#### 23 D-7 Emergency Response Agreements

24 The Permittees have established agreements with federal, state, and local emergency response  
25 agencies and mining companies in the vicinity of the WIPP facility for firefighting, medical  
26 assistance, hazardous materials response, and law enforcement. In the event that on-site  
27 response resources are unable to provide the needed response actions during a medical, fire,  
28 hazardous materials, or security emergency, the RCRA Emergency Coordinator will notify  
29 appropriate emergency response agencies and request assistance. Once on site, emergency  
30 response agency personnel will perform emergency response activities under the direction of  
31 the Incident Commander.

32 The agreements with federal, state, and local agencies and mining companies in the vicinity of  
33 the WIPP facility for emergency response capabilities are on file at the WIPP facility. Additional  
34 agreements may be established when needed. ~~A description~~Descriptions of the agreements  
35 with federal, state, and local agencies and mining operations in the vicinity of the WIPP facility,  
36 as required by 20.4.1.300 NMAC (incorporating 40 CFR §§262.256 and 262.261(c)) and  
37 20.4.1.500 NMAC (incorporating 40 CFR §264.37 and §264.52(c)), include, but is not limited to,  
38 the following:

- 1 • Agreements with local mining companies, including Intrepid Potash NM LLC, White  
2 Marble Mine, and Mosaic Potash Carlsbad Inc. provide for mutual aid and assistance, in  
3 the form of MRTs, in the event of a mine disaster or other circumstance at either of the  
4 facilities. This provision ensures that the WIPP MOC will have two MRTs available at all  
5 times when miners are underground.
- 6 • ~~An~~ agreement with the U.S. Department of Interior (**DOI**), represented by the Bureau of  
7 Land Management (**BLM**), Roswell District, for wildland firefighting support within the  
8 WIPP Land Withdrawal Area.
- 9 • Agreements for mutual-aid firefighting with Eddy County, the City of Hobbs, and the City  
10 of Carlsbad for assistance, including equipment and personnel.
- 11 • ~~A-m~~ Mutual-aid Agreements with the City of Hobbs and the City of Carlsbad for mutual  
12 ambulance, medical, rescue, and hazardous material response services; for use of  
13 WIPP facility radio frequencies during emergencies; and for mutual security and law  
14 enforcement services, within the appropriate jurisdiction limits of each party.
- 15 • Agreements with the Covenant Health Hobbs Hospital and the Carlsbad Medical Center  
16 for the treatment of persons with radiological contamination who have incurred injuries  
17 beyond the treatment capabilities at the WIPP site facility. The WIPP facility provides  
18 transport of the patient(s) to these facilities.
- 19 • Agreements with the Sheriff of Eddy County and the Sheriff of Lea County for mutual law  
20 enforcement services support.
- 21 • An agreement with the New Mexico Department of Homeland Security and Emergency  
22 Management for mutual emergency management support, access to state law  
23 enforcement, public works, and transportation assets.

## 24 D-8 Evacuation Plan

25 If it becomes necessary to evacuate all or part of the WIPP facility, on-site assembly and off-site  
26 staging areas have been established. The off-site staging areas are outside the security fence.  
27 The Permittees have plans and implementation procedures for both surface and underground  
28 evacuations. Drills are performed on these procedures at the WIPP facility at least annually. The  
29 following sections describe the evacuation plan for the WIPP facility, as required under  
30 20.4.1.300 NMAC (incorporating 40 CFR §262.261(f)) and 20.4.1.500 NMAC (incorporating 40  
31 CFR §264.52(f)).

### 32 D-8a Surface Evacuation On-site Assembly and Off-site Staging Areas

33 Figures ~~D-6~~D-1/Figure D-1-NFB shows the surface assembly and staging areas and the  
34 evacuation gates. Security officers remain at the primary staging area-WIPP facility main gate  
35 24 hours a day, and the vehicle trap is opened for personnel during emergency evacuations.  
36 The north gate has a single-person gate and a large gate which that can be opened, similar to  
37 the main gates, for the primary staging area. Alternative evacuation route exit points are located  
38 at the east and south gates. The east and south gates are turnstile gates. Upon notification,  
39 security personnel will respond, open gates, and facilitate egress for evacuation.

1 If a building or area evacuation is necessary, the RCRA Emergency Coordinator, in conjunction  
2 with the Incident Commander, will determine which assembly area is to be used and will  
3 communicate the selection to facility personnel. The preferred evacuation route is determined  
4 based on the nature of the event, prevailing weather conditions, and actual or potential  
5 radiological release. If site evacuation is necessary, the RCRA Emergency Coordinator, in  
6 conjunction with the Incident Commander, will decide which staging area is to be used and will  
7 communicate the selection to facility personnel. The WIPP site evacuation routes are shown in  
8 Figure D-8. The surface evacuation alarm and public address system are used to direct  
9 personnel evacuation. Persons responsible for surface accountability will direct personnel to the  
10 selected staging area outside the security fence.

11 Personnel report to the designated assembly or staging area where accountability is conducted  
12 (Figure ~~D-6D-1~~/Figure D-1-NFB). Personnel who are working in a contaminated area when site  
13 evacuation is announced will assemble at specific staging areas for potentially contaminated  
14 personnel in order to minimize contact with other personnel during the evacuation.

#### 15 D-8b Underground Assembly Areas and Egress Hoist Stations

16 Depending upon the type of emergency and level of response, it may be necessary for  
17 personnel in the underground to shelter in place, report ~~top to~~ designated assembly areas  
18 (Figure ~~D-7D-3~~), or to evacuate the underground. Underground personnel are trained to  
19 immediately report to assembly areas under specific circumstances (i.e., loss of underground  
20 power or ventilation). Underground accountability is taken when the underground is sheltered in  
21 place or evacuated. The Underground Controller is responsible for underground personnel  
22 accountability. Each assembly area contains a mine pager phone, miner's aid station, and  
23 evacuation maps.

24 In accordance with 30 CFR §57.11050, the mine maintains two escapeways. These  
25 escapeways are designated as Egress Hoist Stations. When the need for an underground  
26 evacuation has been determined, underground personnel report to the Egress Hoist Stations.

27 Decontamination of underground personnel will be conducted consistent with radiological  
28 control procedures pursuant to 10 CFR Part 835~~the same way as described for surface~~  
29 ~~decontamination~~. Contaminated personnel are trained to remain segregated from other  
30 personnel until radiological contamination control personnel can respond.

#### 31 D-8c Plan for Surface Evacuation

32 Surface evacuation notification is initiated by the CMRO, as directed by the RCRA Emergency  
33 Coordinator, via ~~sound ing-sounding~~ of the surface evacuation alarm and providing incident  
34 information via the public address system. The persons responsible for surface accountability  
35 assist personnel in evacuation from their areas. Egress routes from buildings and site  
36 evacuation routes and instructions are posted in designated areas throughout the site. Egress  
37 routes from the WHB Unit are shown in Figures ~~D-6a, D-6b, and D-6c~~D-5 through D-7.

#### 38 D-8d Plan for Underground Evacuation

39 Notification for underground evacuation will be made using the underground evacuation alarm  
40 and strobe light signals.



1 Personnel will evacuate to the nearest Egress Hoist Station. Primary underground escape  
2 routes (identified by green reflectors on the rib) will be used, if possible. Secondary underground  
3 escape routes (identified by red reflectors on the rib) will be used if necessary (Figure ~~D-3D-4~~).  
4 Detailed descriptions of escapeways and an underground escape map are included in the  
5 *Underground Escape and Evacuation Plan* on file at the WIPP facility, as required by MSHA, 30  
6 CFR §57.11053, for underground mining situations. The MSHA required map takes precedence  
7 over Figure ~~D-3D-4~~, *Underground Escape and Evacuation Map*, should an underground mine  
8 related event occur necessitating a change to the evacuation routes. The Underground  
9 Controller is responsible for underground personnel accountability and for reporting  
10 accountability to the RCRA Emergency Coordinator.

11 Upon reaching the surface, personnel will report to their on-site surface assembly or off-site  
12 staging area, as directed, to receive further instructions.

13 Members of the WIPP Fire Department and the MRT who may be underground, will assist in the  
14 evacuation of the underground when an underground evacuation is called for. A reentry by the  
15 MRT will be performed according to 30 CFR Part 49 and MSHA regulations for reentry into a  
16 mine. The MRTs are trained in compliance with 30 CFR Part 49 in mine mapping, mine gases,  
17 ventilation, exploration, mine fires, rescue, and recovery.

#### 18 D-8e Further Site Evacuation

19 In the event of an evacuation involving the need to transport employees, the following  
20 transportation will be available:

- 21 • Buses/vans—WIPP facility buses/vans will be available for evacuation of personnel. The  
22 buses/vans are stationed in the employee parking lot.
- 23 • Privately Owned Vehicles—Because many employees drive to work in their own  
24 vehicles, these vehicles may be used in an emergency. Personnel will be provided  
25 routes to be taken when leaving the facility.

26 These vehicles may be used to transport personnel who have been released from the site by  
27 the RCRA Emergency Coordinator.

28 The primary evacuation routes for the WIPP facility ~~is Louis Whitlock Road~~ ~~are the main DOE~~  
29 ~~north/south access road~~, which connects to U.S. Highways 62/180 ~~(to the north)~~ and State  
30 Highway 128 ~~via the South Access Road~~ ~~(south)~~. Alternate evacuation routes from the facility  
31 are provided at the south side and the east side of the facility. Utilization of the alternate  
32 evacuation routes leads to either the main DOE north/south access road or Campbell Road,  
33 which travels north and intersects with U.S. Highway 62/180. The primary and alternate  
34 evacuation routes are depicted in Figures D-8 and D-8a.

#### 35 D-9 Location of the RCRA Contingency Plan and Plan Revision

36 In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §§262 and 262.262(a)) and  
37 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a)), the owner/operator of the WIPP facility  
38 will ensure that copies of this *RCRA Contingency Plan* are maintained at the WIPP facility and  
39 are available to the emergency personnel and organizations described in Section D-2. When the  
40 *RCRA Contingency Plan* is revised, updated copies are distributed (electronically or via site

1 mail) or hand delivered to applicable WIPP facility emergency personnel and Emergency  
2 Operations Centers. In addition, the Permittees will make copies available to the following  
3 federal, state, and local agencies and mining companies in the vicinity of the WIPP facility, as  
4 required by 20.4.1.300 (incorporating 40 CFR §262.262(a)) and 20.4.1.500 NMAC  
5 (incorporating 40 CFR §264.53(b)):

- 6 • Intrepid Potash New Mexico LLC
- 7 • White Marble Mine
- 8 • Mosaic Potash Carlsbad Inc.
- 9 • City of Carlsbad
- 10 • Carlsbad Medical Center, Carlsbad
- 11 • Covenant Health Hobbs Hospital, Hobbs
- 12 • City of Hobbs
- 13 • BLM, Carlsbad
- 14 • New Mexico State Police
- 15 • New Mexico Department of Homeland Security and Emergency Management
- 16 • Eddy County Commission
- 17 • Sheriff of Eddy County
- 18 • Sheriff of Lea County
- 19 • Eddy County Fire and Rescue
- 20 • Eddy County Emergency Management
- 21 • Lea County Emergency Management

22 In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.263) and 20.4.1.500 NMAC  
23 (incorporating 40 CFR §264.54), the Permittees will ensure that this plan is reviewed and  
24 amended whenever:

- 25 • The Permit for the WIPP facility is revised in any way that would affect the *RCRA*  
26 *Contingency Plan*;
- 27 • This plan fails in an emergency;
- 28 • The WIPP facility design, construction, operation, maintenance, or other circumstances  
29 change in a way that materially increases the potential for fires, explosions, or releases  
30 of hazardous waste or hazardous constituents or change the response necessary in an  
31 emergency;
- 32 • The list of RCRA Emergency Coordinators changes; or
- 33 • The list of WIPP facility emergency equipment changes.



1

## **TABLES**

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**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
M.G. (Mike) Proctor		(575) 234-8276 or (575) 234-8143		(575) 234-8111
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
G.W. (Gregory) Brown		(575) 234-5862		(575) 234-8111
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
M.L. (Martin) Mendes		(575) 234-5822		(575) 234-8111
D.J. (Derek) Tweedy		(575) 234-8272		(575) 234-8111

\* 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.

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**Table D-2  
 Emergency Equipment Maintained at the Waste Isolation Pilot Plant**

Equipment	Description and Capabilities	Location
Communications		
Building Fire Alarms	Fire alarm panels, fire alarm transmitter, audible alarm devices (e.g., horns, bells, tones) that provide notification of fires; transmitted to the CMR	Guard and Security Building (Building 458), Water Pumphouse (Building 456), Warehouse/Shops Building (Building 453), Exhaust Shaft Filter Building (Building 413), New Filter Building ( <b>NFB</b> ) (Building 416), Salt Reduction Building ( <b>SRB</b> ) (Building 417), Support Building (Building 451), CMR/Computer Room, Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Salt Handling ( <b>SH</b> ) Shaft Hoisthouse (Building 384), Auxiliary Warehouse Building (Building 455), Engineering Building (Building 486), Training Building (Building 489), Safety and Emergency Services Facility (Building 452), and CAAs (Buildings 474A and 474B)
Underground Fire Alarms	Fire alarm panels, fire alarm transmitter, and audible/visual alarm devices (e.g., horns, bells, strobes) that provide notification of fires; transmitted to the CMR	Fire detection and control panel locations: Waste Shaft Underground Station, SH Shaft Underground Station, Between E-140 and E-300 in S-2180 Drift, Fuel Station (N150/W170)
Site Notification System; Underground Evacuation Alarm System	For surface, alarms and notifications transmitted over paging channel of the public address system, manually initiated; for underground, audible alarm	Site-wide
Public Address System	Includes intercom phones; handset stations and loudspeaker assemblies	Site-wide

Equipment	Description and Capabilities	Location
Mine Pager Phones	Battery-operated paging system	Underground at S550/W30, S1000/W30, S1950/E140, SH Shaft Collar and Underground Station Waste Shaft Collar and Underground Station; – surface at Support Building (Building 451, FSM desk, CMR, lamproom), Safety and Emergency Services Facility (Building 452, Fire Department workstation area, Mine Rescue Room)
Portable Radios	Two-way, portable; transmits and monitors information to/from other transmitters	Issued to individuals
Plant-Based Radios	Two-way, stationary; transmits and monitors information to/from other <del>transmitters</del> radios	Safety and Emergency Services Facility (Building 452), Guard and Security Building (Building 458), Support Building (Building 451, CMR, FSM desk)
Mobile Phones	Provide communications link between emergency response personnel, as needed	Issued to individuals plus emergency vehicles
<b>Spill Response Equipment and Materials</b>		
HAZMAT Equipment	Spill response equipment and supplies, PPE, and decontamination supplies stored and maintained in accordance with NFPA 1901 and as documented in WIPP facility files	Surface, in designated areas near Safety and Emergency Services Facility (Building 452)
Absorbent Materials	Containment or cleanup of spills, including: Pressurized spill-response gun; Absorbent sheets and/or dikes for containment or cleanup of spills of oil, petroleum-based chemicals, and general liquids; Spill-control material for solvents and neutralizing absorbents and for acids/caustics	Surface, in designated areas near Safety and Emergency Services Facility (Building 452)
<b>Medical Resources</b>		
Ambulance	A minimum of one ambulance, maintained and equipped in accordance with the New Mexico Ambulance Standard, 18.3.14 NMAC, and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)
Medical Cart	A minimum of one medical cart, equipped to provide basic life support operations, as documented in WIPP facility files	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Miners First Aid Stations	Equipped per 30 CFR 57.15001	Underground (Salt Shaft Area, Waste Shaft Area, E300 Maintenance Shop, and at S1000/W30, S1300/W30, and S1950/E140)

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Equipment	Description and Capabilities	Location
<b>Fire Detection and Fire Suppression Equipment</b>		
Building Smoke, Thermal Detectors, or Manual Pull Stations	Devices that trigger an alarm and/or fire suppression system	Guard and Security Building (Building 458), Warehouse/Shops Building (Building 453), Support Building (Building 451, CMR/Computer Room), Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Underground Fuel Station (N150/W170), SH Shaft Hoisthouse (Building 384), Engineering Building (Building 486), Safety and Emergency Services Facility (Building 452), and Training Building (Building 489)
Fire Trucks	A minimum of two fire trucks with rescue equipment to assist in fighting fires and emergency rescue; firefighter equipped in accordance with NFPA 1901 and/or 1906 and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)
Rescue Cart	A minimum of one light rescue unit, equipped in accordance with the NFPA 1901 and as documented in WIPP facility files	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Fire Suppression Cart	A minimum of one special-purpose electric cart to assist in fighting fires; equipped with a minimum of one fire extinguisher	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Fire Extinguishers	Hand-held fire extinguishers; located throughout the facility in accordance with NFPA-10	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files
Automatic Dry Chemical Extinguishing Systems	Automatic; actuated by thermal detectors or by manual pull stations	Underground fuel station (N150/W170)
Automatic Fire Suppression Systems on liquid fueled vehicles	Individual automatic fire suppression systems installed on applicable liquid-fueled vehicles, as determined by a fire risk assessment performed in accordance with NFPA 122	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files

<b>Equipment</b>	<b>Description and Capabilities</b>	<b>Location</b>
Sprinkler Systems	NFPA water-based fire suppression systems	Water Pumphouse (Building 456), Guard and Security Building (Building 458), Waste Handling Building (Building 411, CH Bay, RH Bay, and Overpack Repair Areas only), TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413), NFB (Building 416), SRB (Building 417), and CAAs (Buildings 474A and 474B)
Water Tanks, Hydrants	Fire suppression water supply; one 180,000-gallon capacity tank, plus a second tank with 100,000-gallon reserve	Tanks are at southwestern edge of WIPP facility; pipelines and hydrants are throughout the surface
Fire Water Pumps	Fire suppression water supply; pumps are minimally rated at 125 pounds per square inch, 1,500 gallons per minute centrifugal pump, one with electric motor drive, the other with diesel engine; pressure maintenance jockey pump	Water Pumphouse (Building 456)
<b>Personal Protection Equipment</b>		
Head Lamps	Mounted on hard hat; battery operated	Each person underground
Underground Self-Rescuer Units	Short-term self-rescue devices per 30 CFR 57.15030	Each person underground
Self-Contained Self-Rescuer	Air supply; a minimum of 12 caches in the underground; self-contained rescue units shall be adequate to protect an individual for one hour or longer or, alternatively, sufficient to allow the employee time to reach an additional self-contained self-rescue device in the underground per NMSA 69-8-16	Cached throughout the underground
Mine Rescue Self-Contained Breathing Apparatus (SCBA)	Oxygen supply; 4-hour closed circuit units consistent with 30 CFR 49.6; a minimum of 12 units, one for each Mine Rescue Team member	Safety and Emergency Services Facility (Building 452, Mine Rescue Training Room)
Fire Department Self-Contained Breathing Apparatus (SCBA)	Air supply; a minimum of 12 units; SCBAs shall meet the minimum requirements established per NFPA 1981	Surface Fire Trucks; Underground Rescue Cart
<b>General Plant Emergency Equipment</b>		
Emergency Lighting	For employee evacuation, and fire/spill containment; linked to main power supply, and selectively linked to back up diesel power supply and/or battery-backed power supply	Waste Handling Building (Building 411); TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413) NFB (Building 416), and SRB (Building 417)
Backup Power Sources	A minimum of two diesel generators, and battery-powered uninterruptible power supply (UPS)	Generators are located on the surface. UPS is located at the essential loads

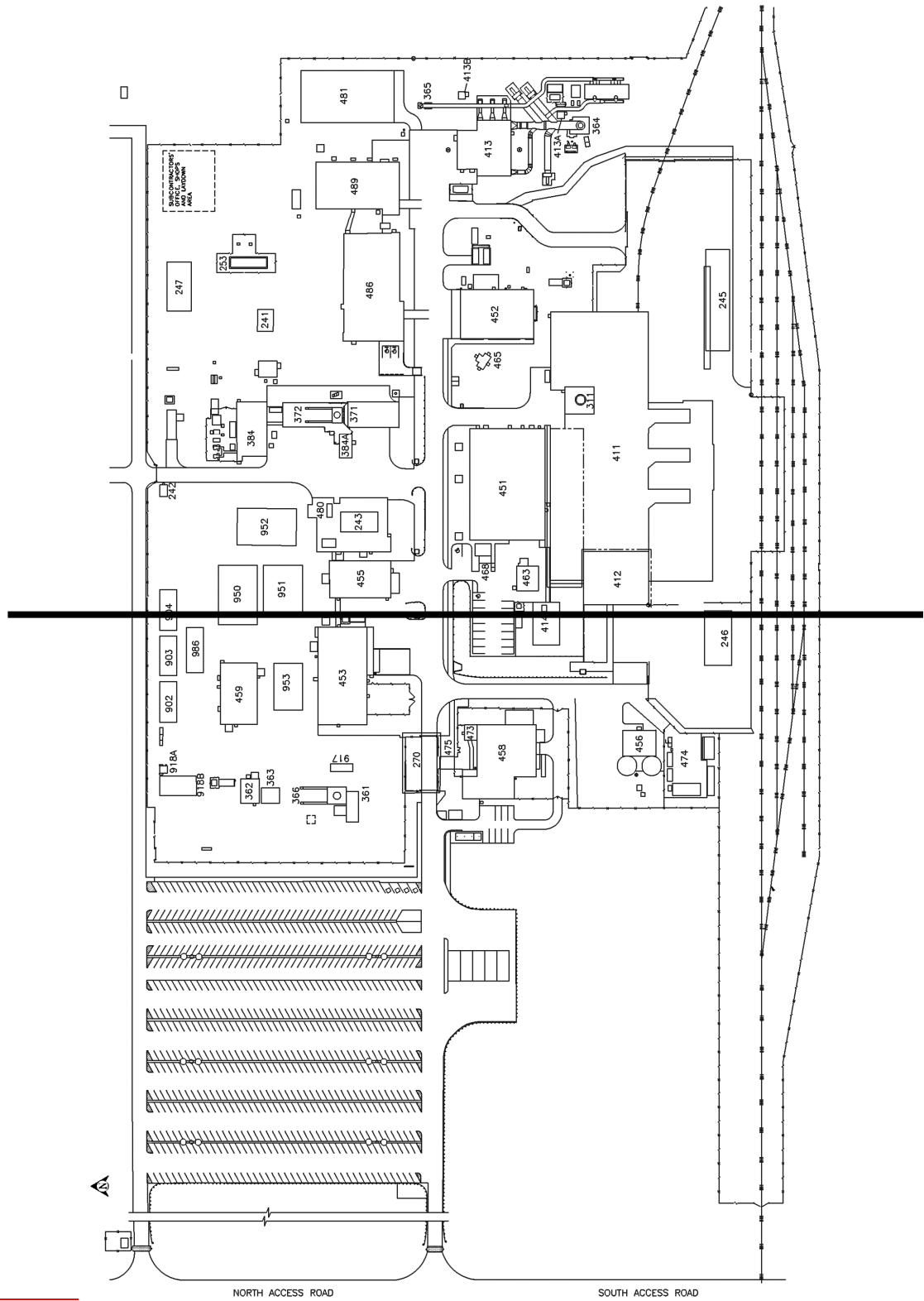
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Equipment	Description and Capabilities	Location
Emergency Hoist	Hoist in Air Intake Shaft	Air Intake Shaft (Building 361)
Emergency Showers	For emergency flushing of chemical contact or injury	Waste Handling Building (Building 411) is served by the decontamination shower trailer located north of Building 411, in front of Building 952, between Buildings 243 and 455; and CAAs (Building 474A)
Emergency Eyewash Equipment	For emergency flushing of affected eyes	Waste Handling Building (Building 411, RH Bay, Site Derived Waste Area, Waste Shaft Collar, and Room 108 TRUPACT III only), TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413), NFB (Building 416), SRB (Building 417), CAAs, and SAAs
Overpack containers for TRU Mixed Waste	85 Gallon drums SWBs TDOP	Warehouse Annex (Building 481)
Aquaset or Cement	Material for solidification of liquid waste generated as a result of <del>fire-fighting</del> firefighting water or decontamination solutions	Surface Connex A, located south of Waste Handling Building (Building 411)
TDOP Uperder	Uperder facilitates overpacking standard waste boxes <del>into TDOPs</del>	Waste Handling Building (Building 411)
<del>Non hazardous</del> Nonhazardous Decontaminating Agents	For decontamination of surfaces, equipment, and personnel	Waste Handling Building (Building 411); Surface Connex A, located south of Building 411



## FIGURES

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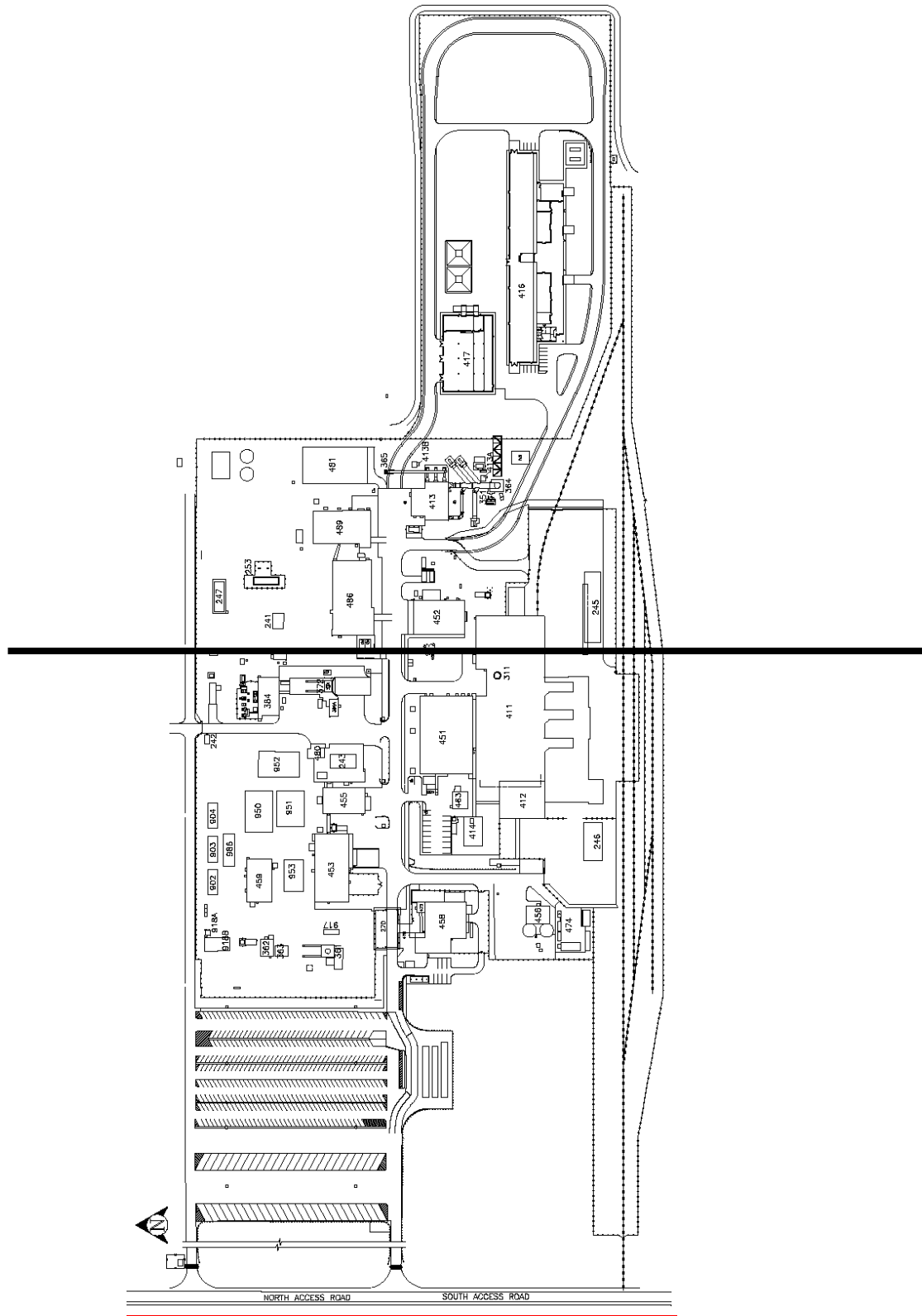


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BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#372	SALT HANDLING SHAFT HEADFRAME	#474F	WASTE OIL RETAINER
#242	GUARDSHACK	#384	SALT HANDLING SHAFT HOISTHOUSE	#475	GATEHOUSE
#243	SALT HAULING TRUCKS SHELTER	#384A	MINING OPERATIONS	#480	VEHICLE FUEL STATION
#245	TRUPACT TRAILER SHELTER	#411	WASTE HANDLING BUILDING	#481	WAREHOUSE ANNEX
#246	MgO STORAGE SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#486	ENGINEERING BUILDING
#253	13.8 KV SWITCHGEAR 25P-SWG15/1	#413	EXHAUST SHAFT FILTER BUILDING	#489	TRAINING BUILDING
#254.1	AREA SUBSTATION NO.1 25P-SW15.1	#413A	MONITORING STATION A	#H-16	SANDIA TEST WELL
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#413B	MONITORING STATION B	#917	AIS MONITORING
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#414	WATER CHILLER FACILITY & BLDG	#918A	VOC AIR MONITORING STATION
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#451	SUPPORT BUILDING	#918B	VOC LAB TRAILER
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#452	SAFETY & EMERGENCY SERVICES FACILITY	#950	WORK CONTROL TRAILER
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#453	WAREHOUSE/SHOPS BUILDING	#951	PROCUREMENT/PURCHASING
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#455	AUXILLIARY WAREHOUSE BUILDING	#952	TRAILER
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#456	WATER PUMPHOUSE	#953	MODULAR OFFICE COMPLEX
#254.9	480V SWITCHGEAR (25P-SWG04/9)	#457N	WATER TANK 25-D-001B	#986	PUBLICATIONS & PROCEDURES
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#457S	WATER TANK 25-D-001A	SWR NO.6	TRAILER SWITCHRACK NO. 6
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#458	GUARD AND SECURITY BUILDING	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#256.4	SWITCHBOARD #4 (25P-SBD04/4)	#459	CORE STORAGE BUILDING	SWR NO.7C	SWITCHRACK NO. 7C
#270	ACCESS CONTROL POINT SHELTER	#463	COMPRESSOR BUILDING	SWR NO.10	SWITCH RACK NO. 10
#311	WASTE SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.11	SWITCH RACK NO. 11
#351	EXHAUST SHAFT	#468	TELEPHONE HUT	SWR NO.12	SWITCH RACK NO. 12
#361	AIR INTAKE SHAFT	#473	ARMORY BUILDING	SWR NO.15	SWITCH RACK NO. 15
#362	AIR INTAKE SHAFT/HOIST HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY		
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474A	HAZARDOUS WASTE STORAGE BUILDING		
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474B	HAZARDOUS WASTE STORAGE BUILDING		
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474C	OIL & GREASE STORAGE BUILDING		
#366	AIR INTAKE SHAFT HEADFRAME	#474D	GAS BODLE STORAGE BUILDING		
#371	SALT HANDLING SHAFT	#474E	HAZARD MATERIAL STORAGE BUILDING		

**Figure D-1a**  
**Legend to Figure D-1**

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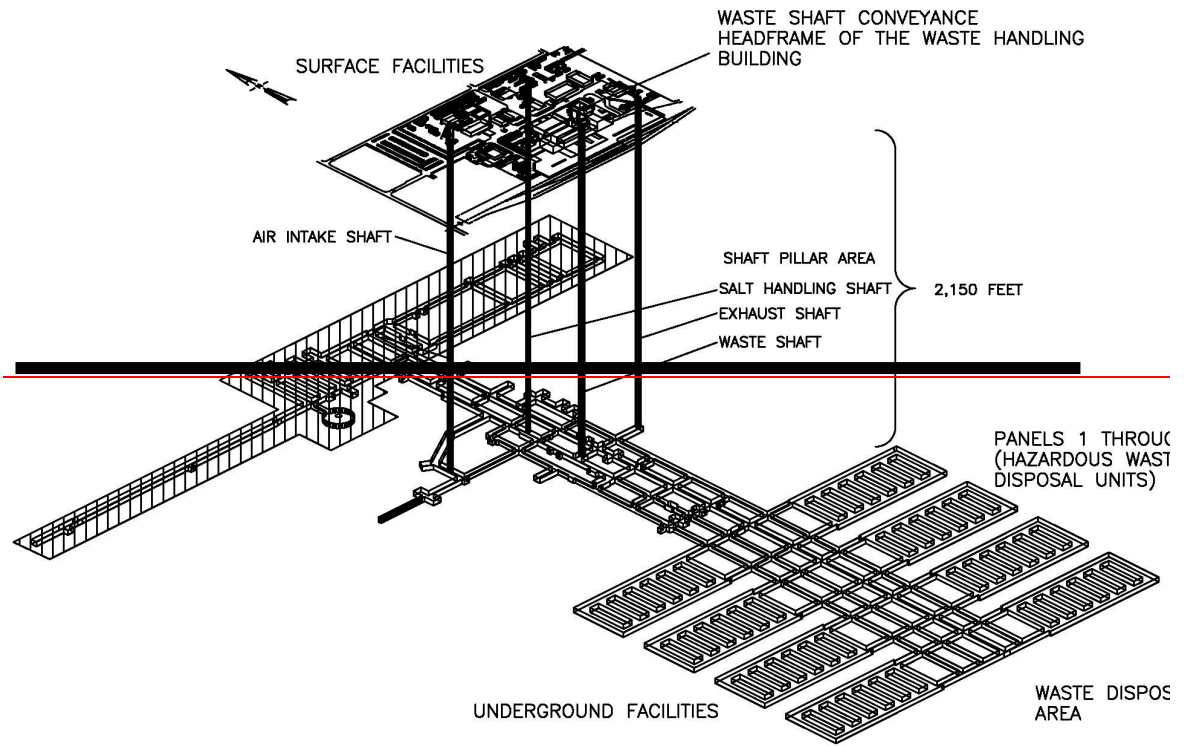




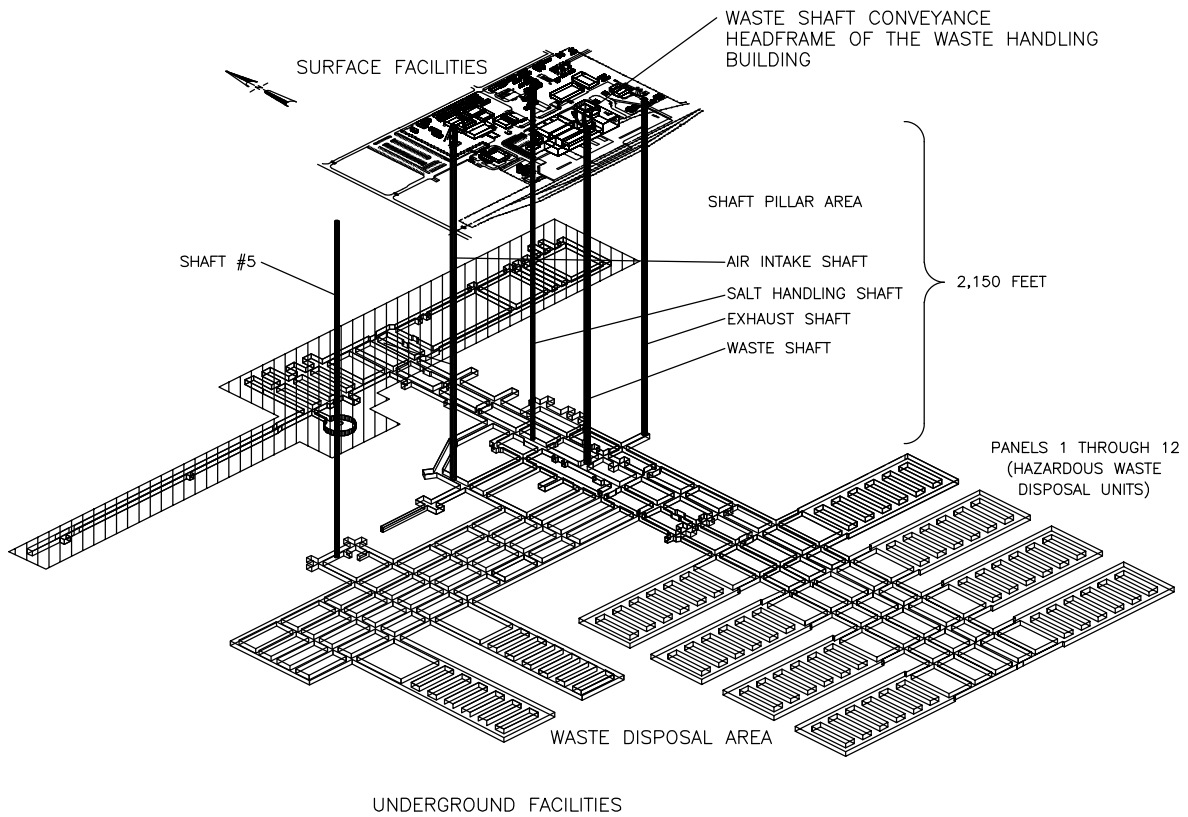
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#254.1	AREA SUBSTATION NO.1 25P-SW15. 1	#413B	MONITORING STATION B	#H-16	SANDIA TEST WELL
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#414	WATER CHILLER FACILITY & BLDG	#902	TRAILER
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#416	NEW FILTER BUILDING	#903	TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#417	SALT REDUCTION BUILDING	#904	TRAILER
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#451	SUPPORT BUILDING	#917	AIS MONITORING
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918A	VOC AIR MONITORING STATION
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#453	WAREHOUSE/SHOPS BUILDING	#918B	VOC LAB TRAILER
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#455	AUXILIARY WAREHOUSE BUILDING	#950	WORK CONTROL TRAILER
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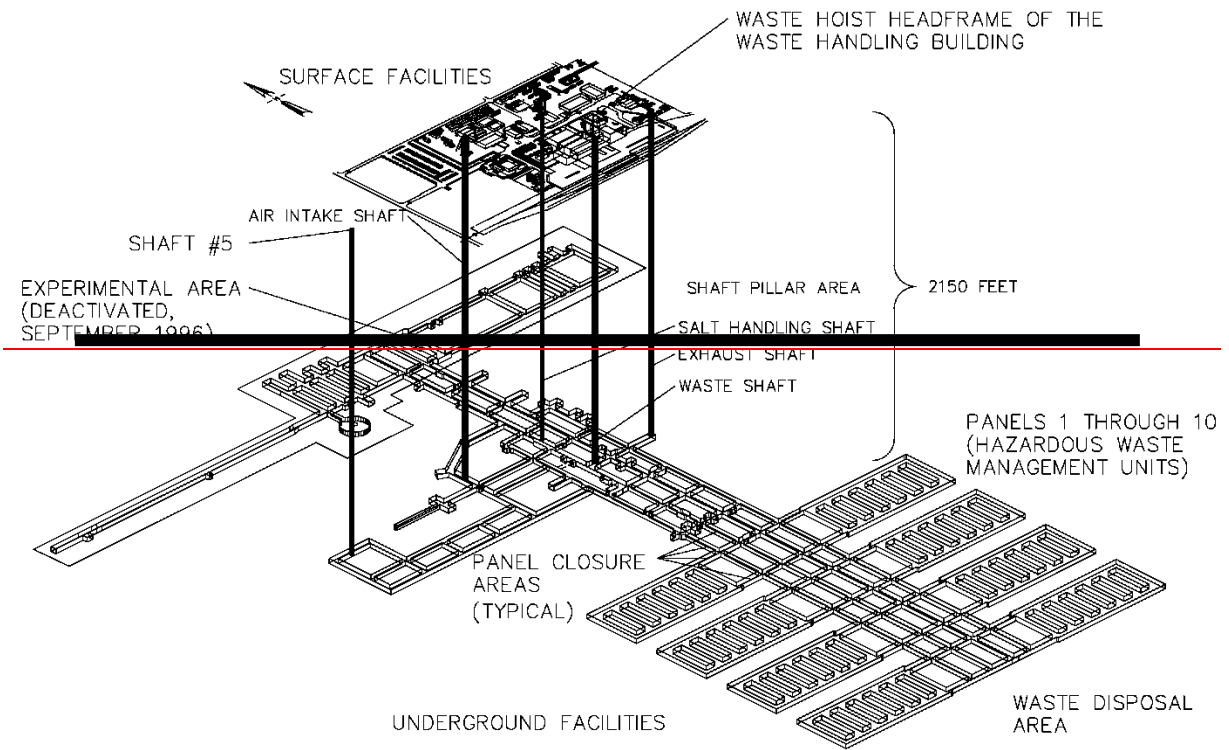
**Figure D-1a-NFB,  
 Legend to Figure D-1-NFB (Building 416)**



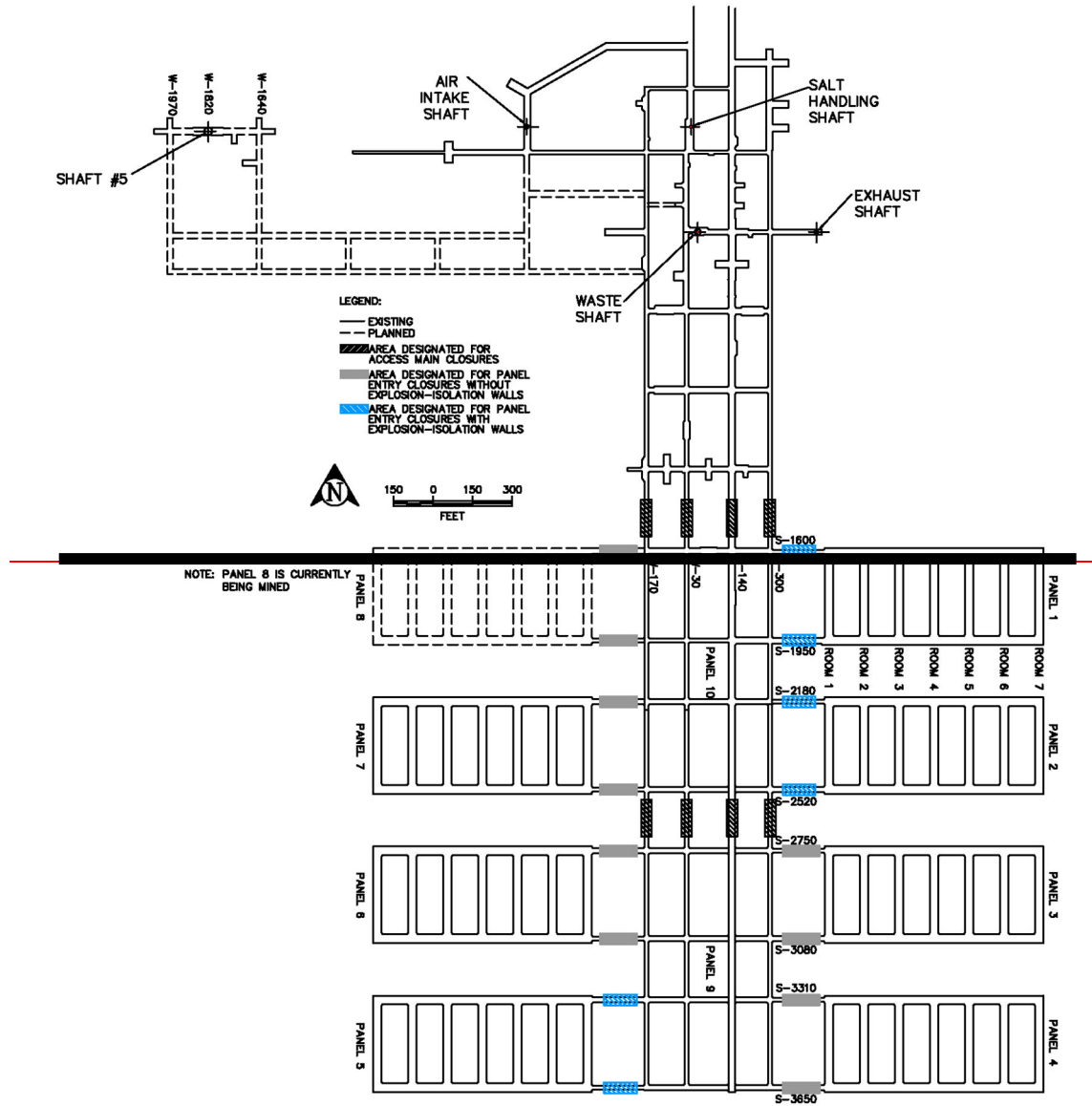




**Figure D-2**  
**Spatial View of the WIPP Facility**

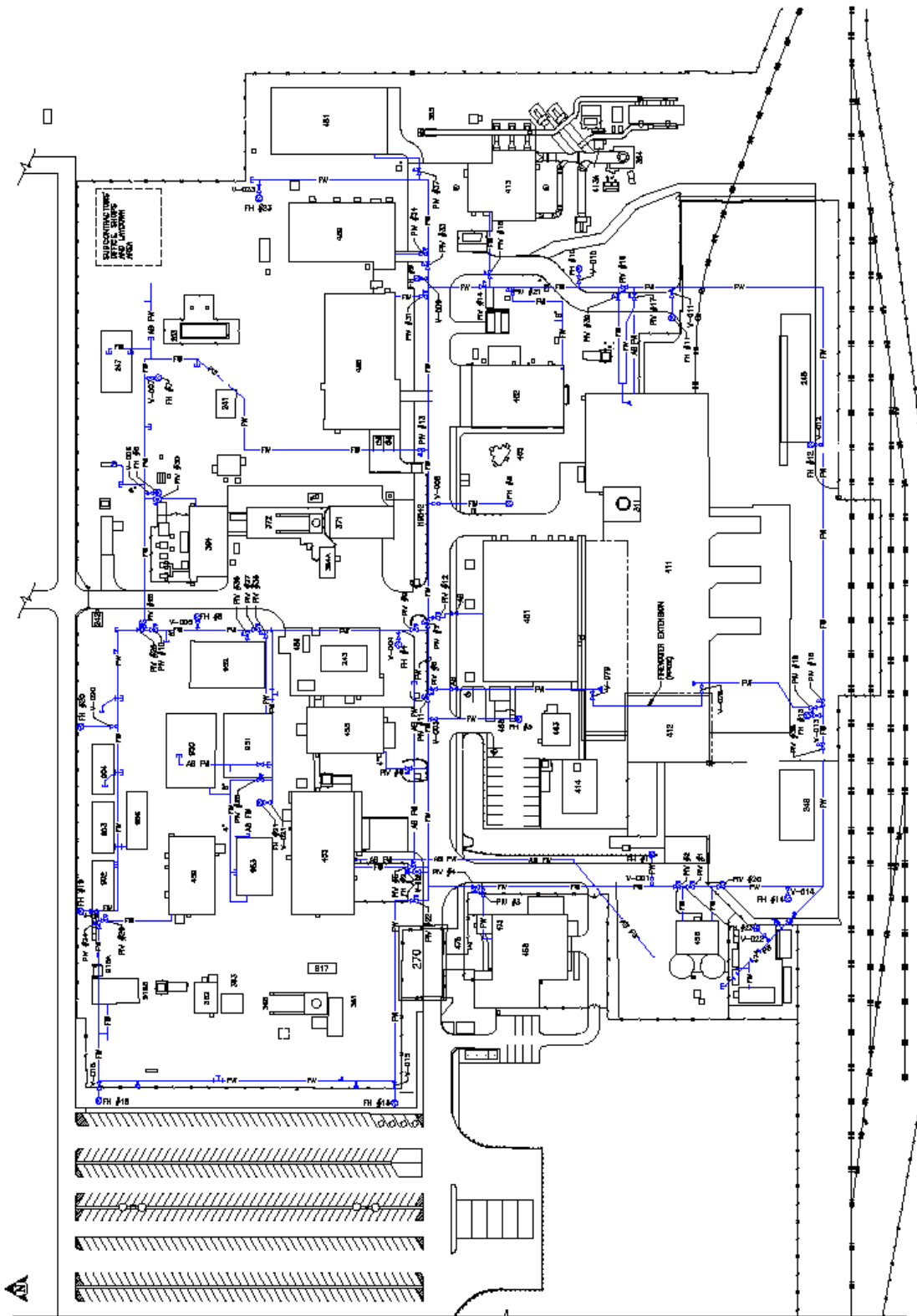


**Figure D-2-S#5**  
**Spatial View of the WIPP Facility (with S#5)**

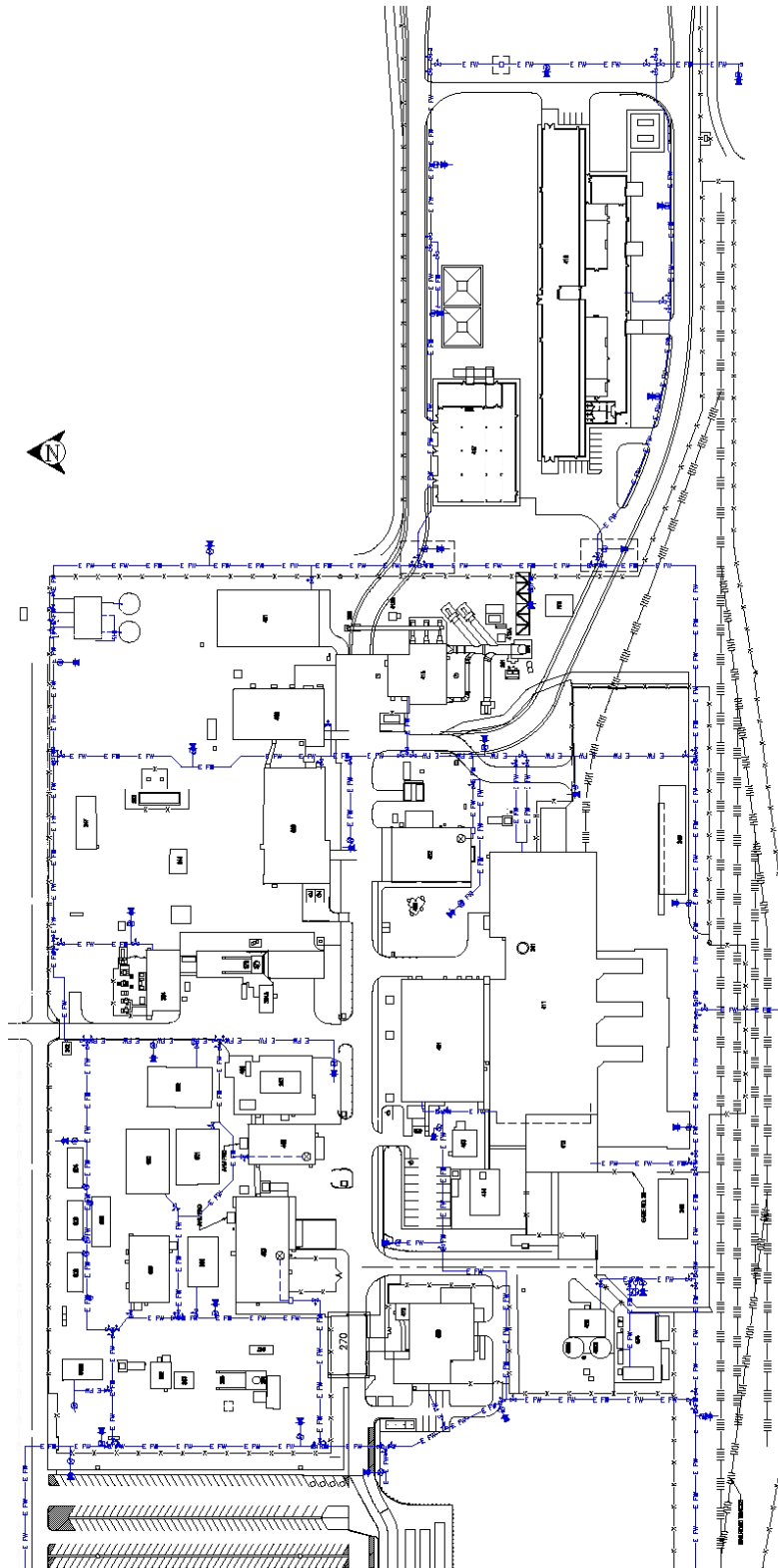


**Figure D-3**  
**WIPP Underground Facilities**

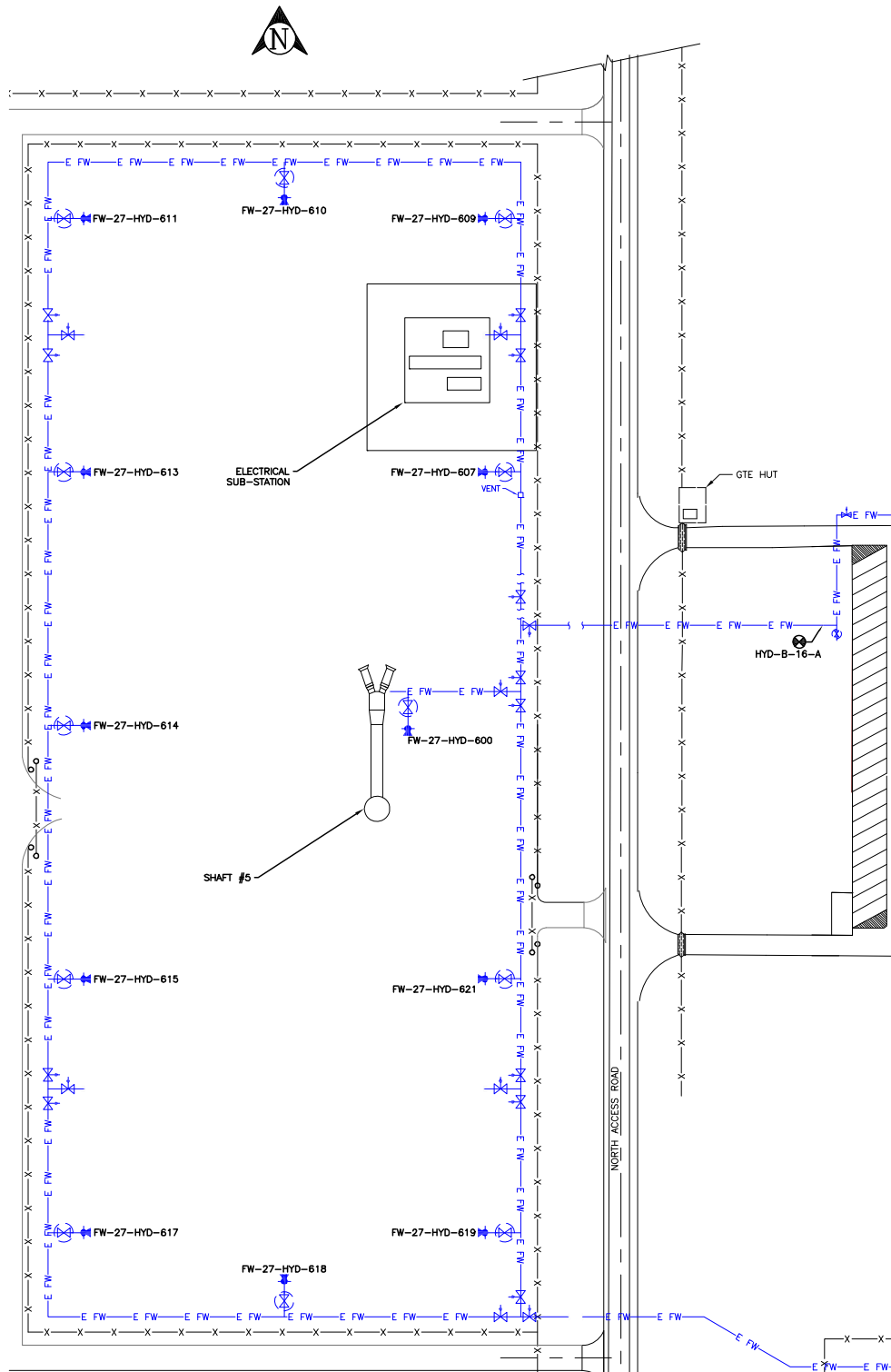




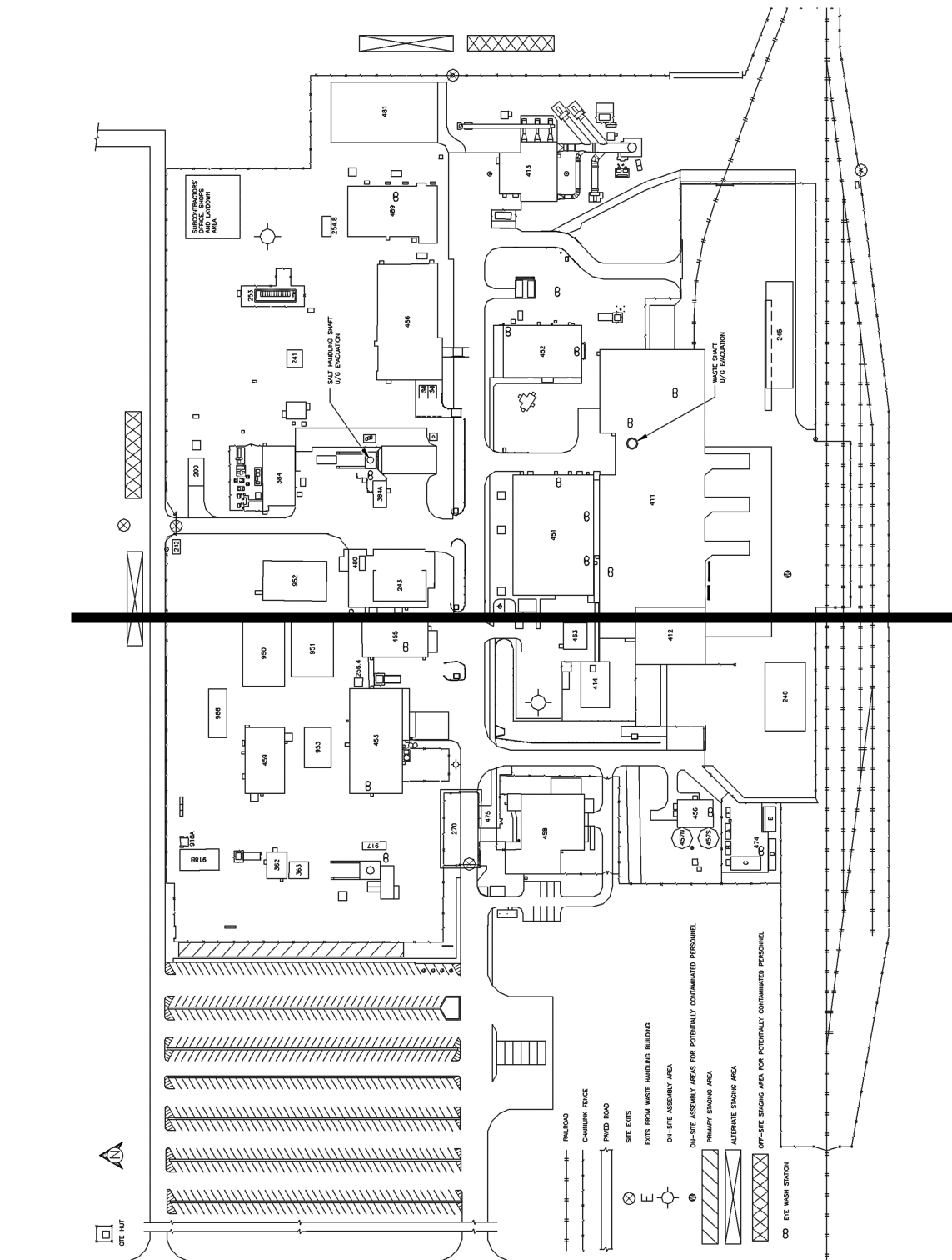
**Figure D-45**  
**Fire-Water Distribution System**



**Figure D-45-NFB**  
**Fire-Water Distribution System with Building 416**

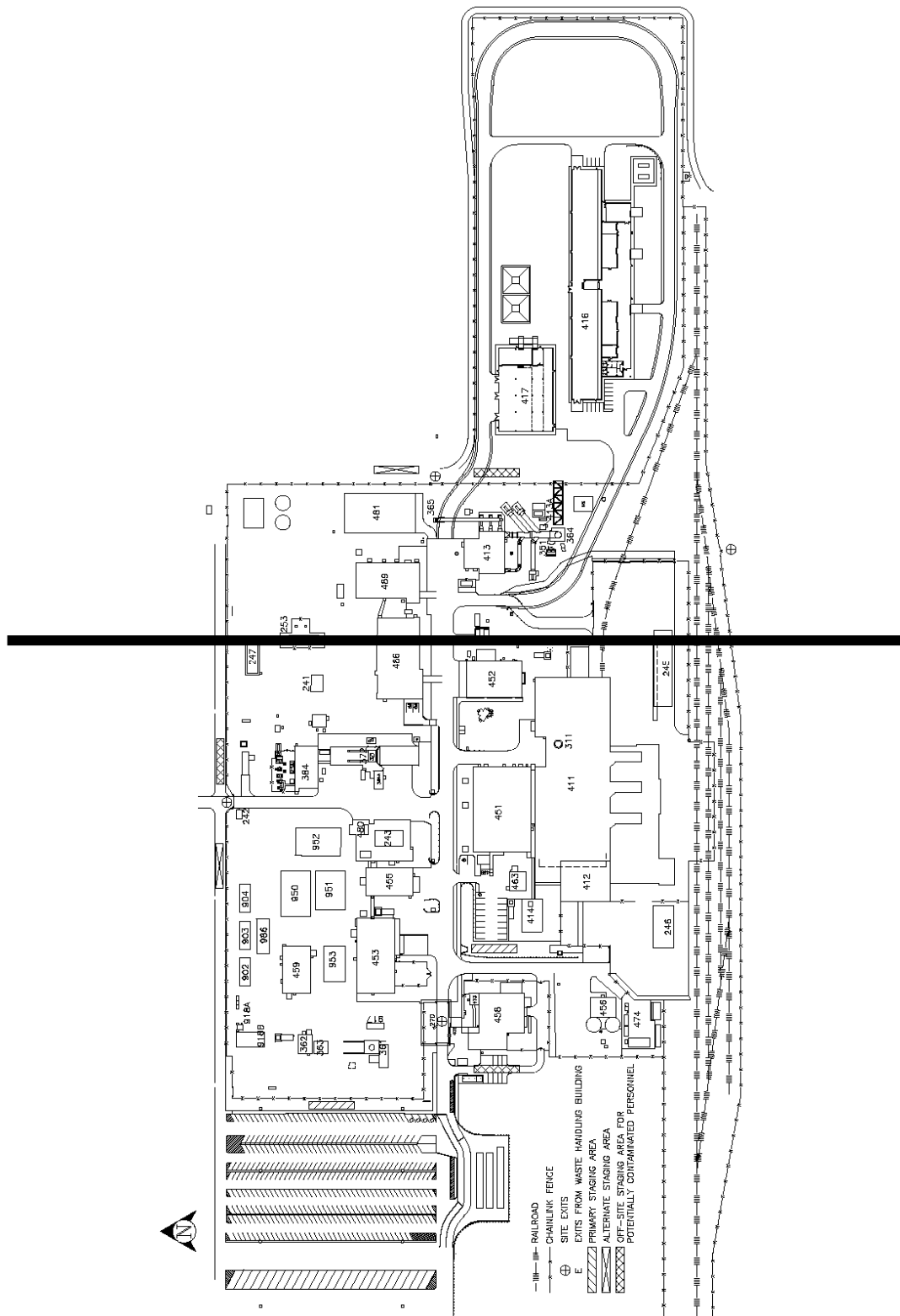


**Figure D-45-S#5**  
**Fire-Water Distribution System (with S#5)**

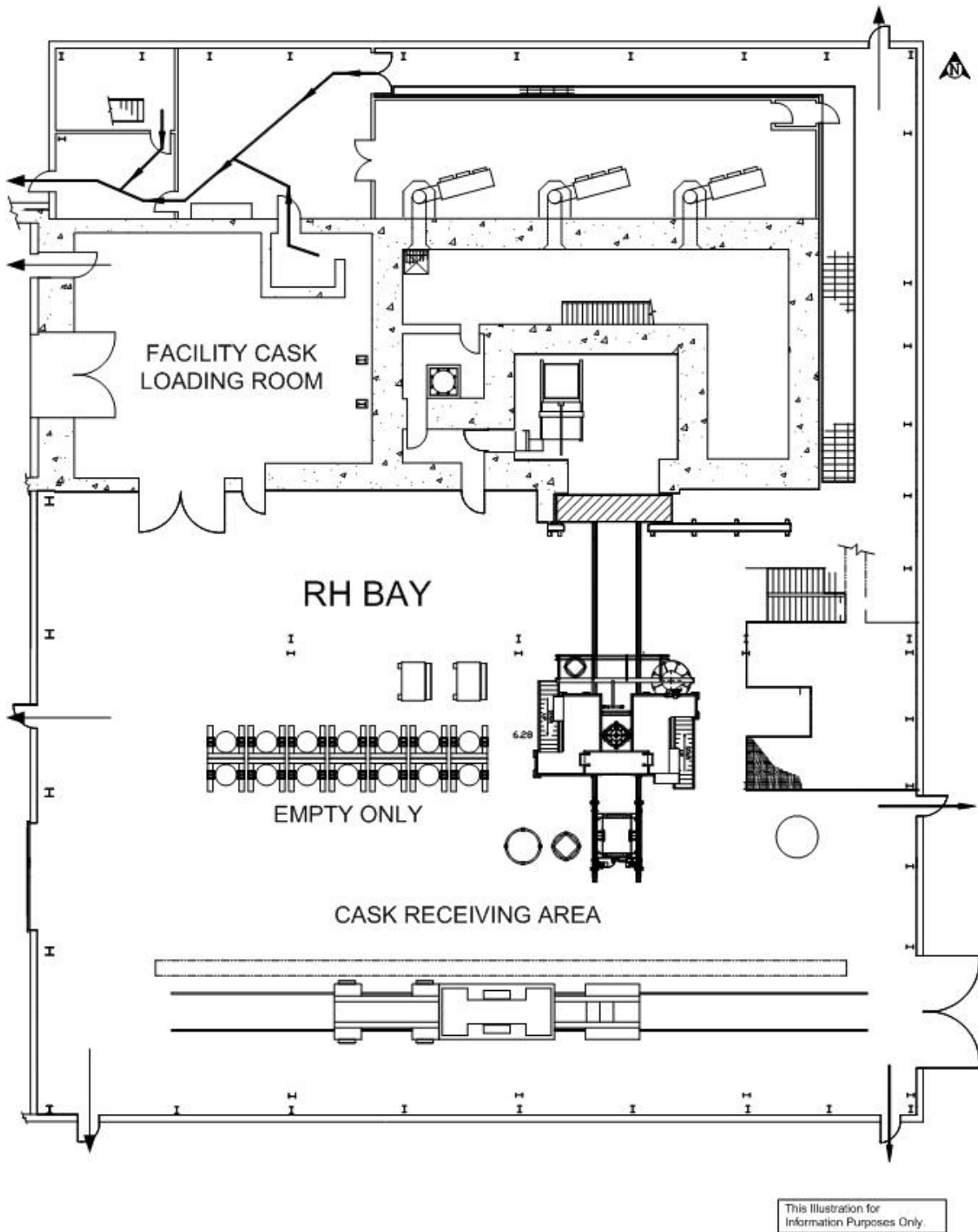


**Figure D-6**  
**WIPP On-Site Assembly Areas and Off Site Staging Areas**

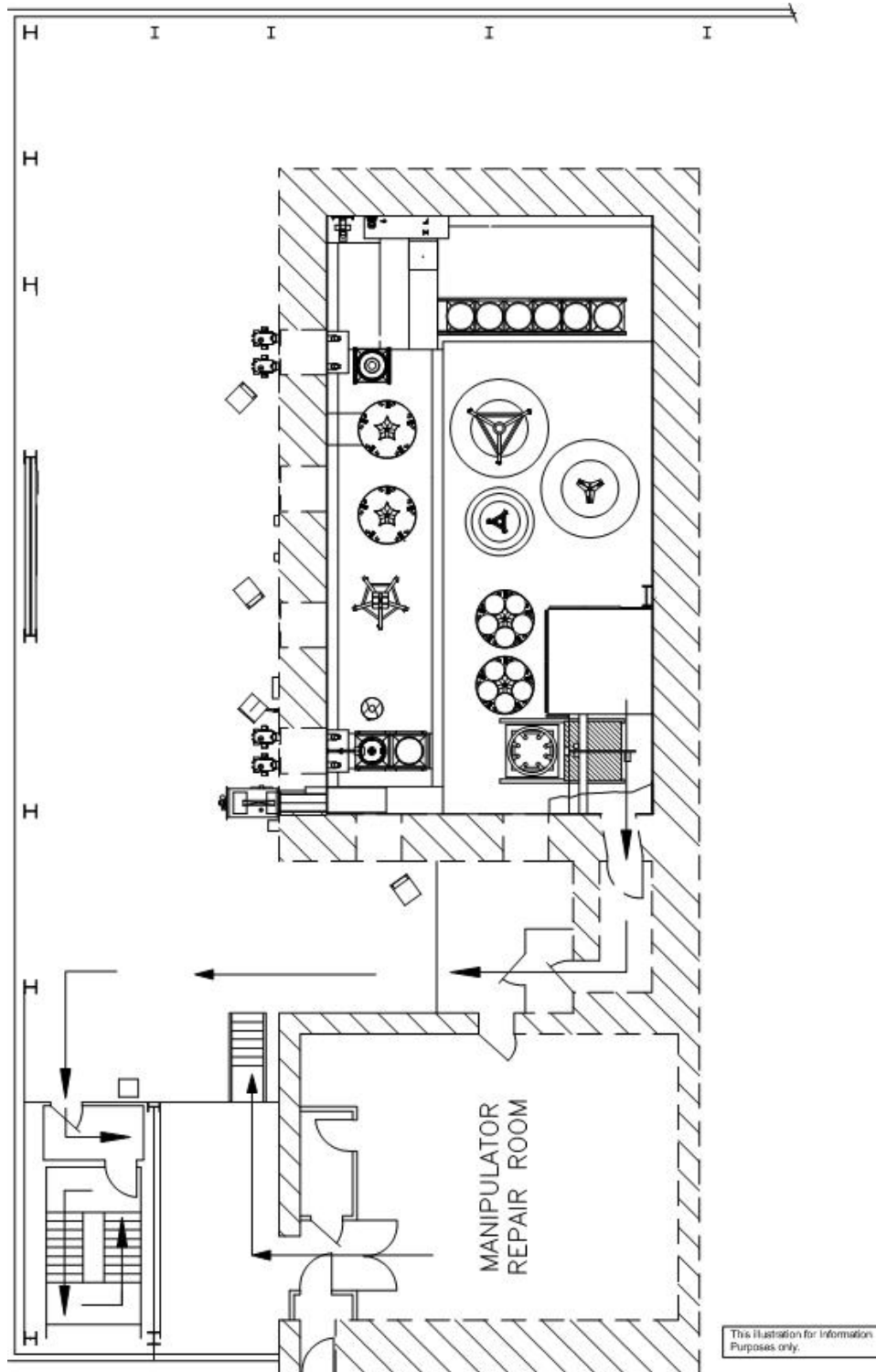




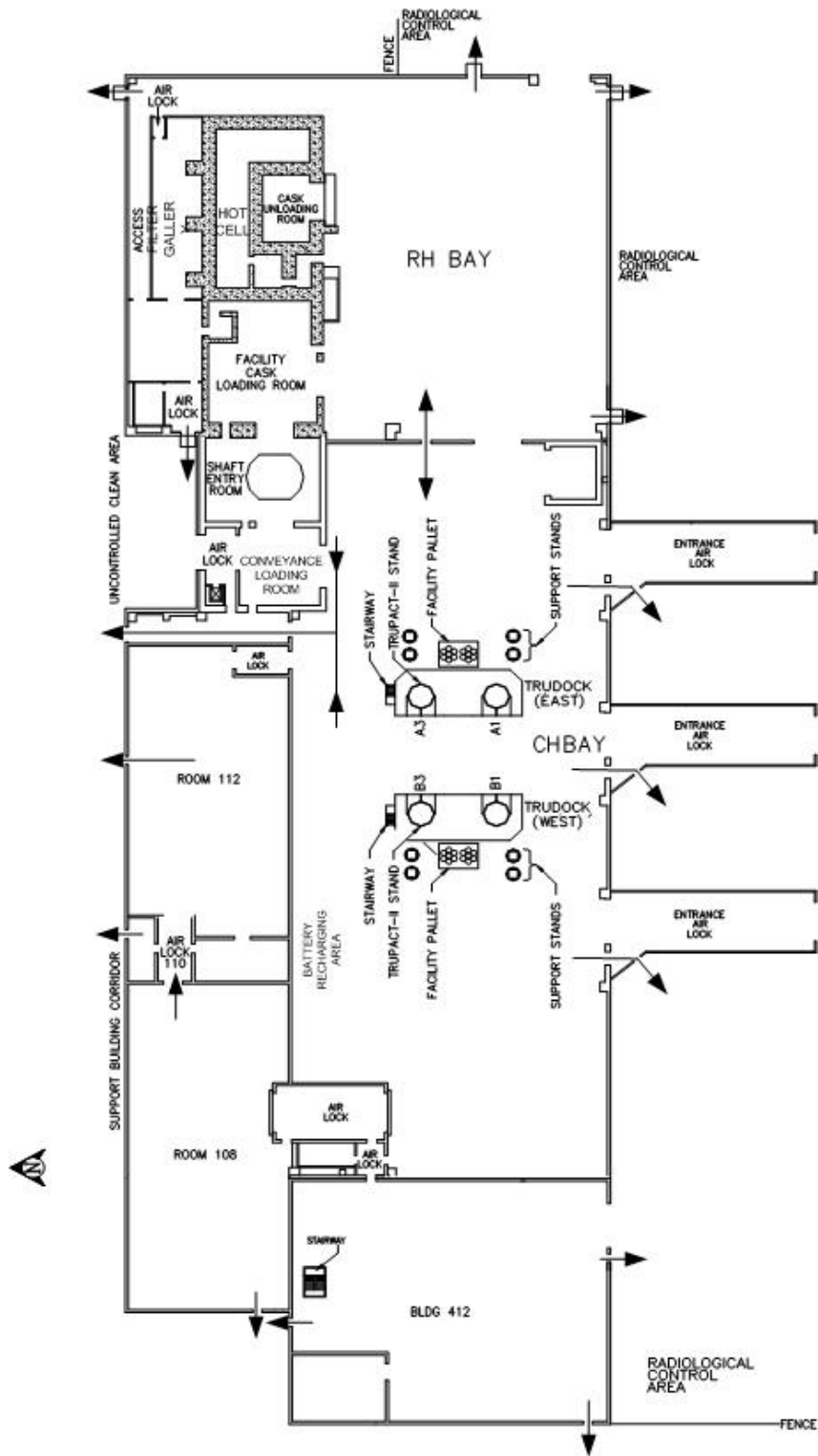
**Figure D-6-NFB**  
**WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416**



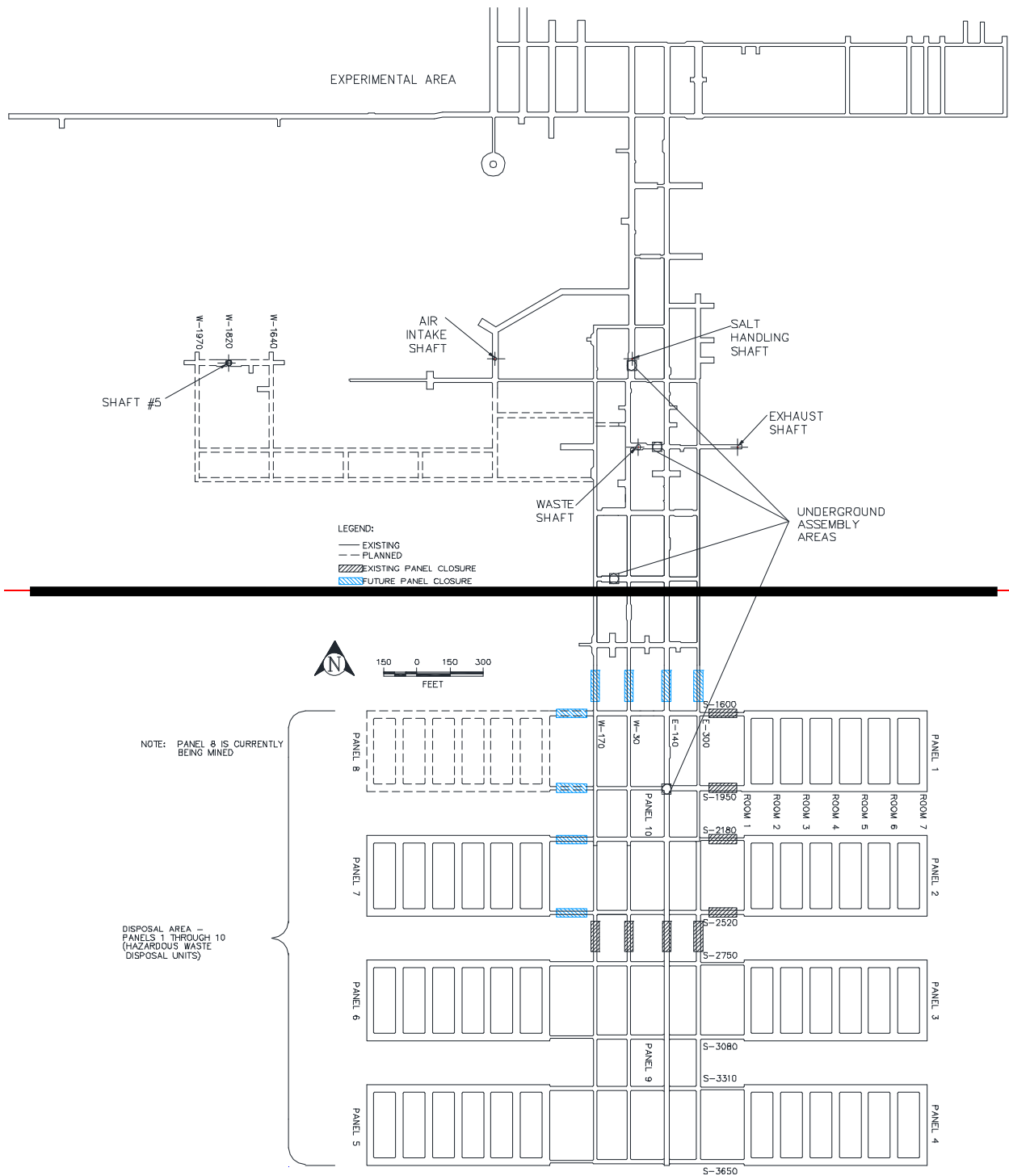
**Figure D-6aD-5**  
**RH Bay Evacuation Routes**



**Figure D-6bD-6**  
**RH Bay Hot Cell Evacuation Route**



**Figure D-6cD-7**  
 Evacuation Routes in the Waste Handling Building



**Figure D-7  
 Designated Underground Assembly Areas**



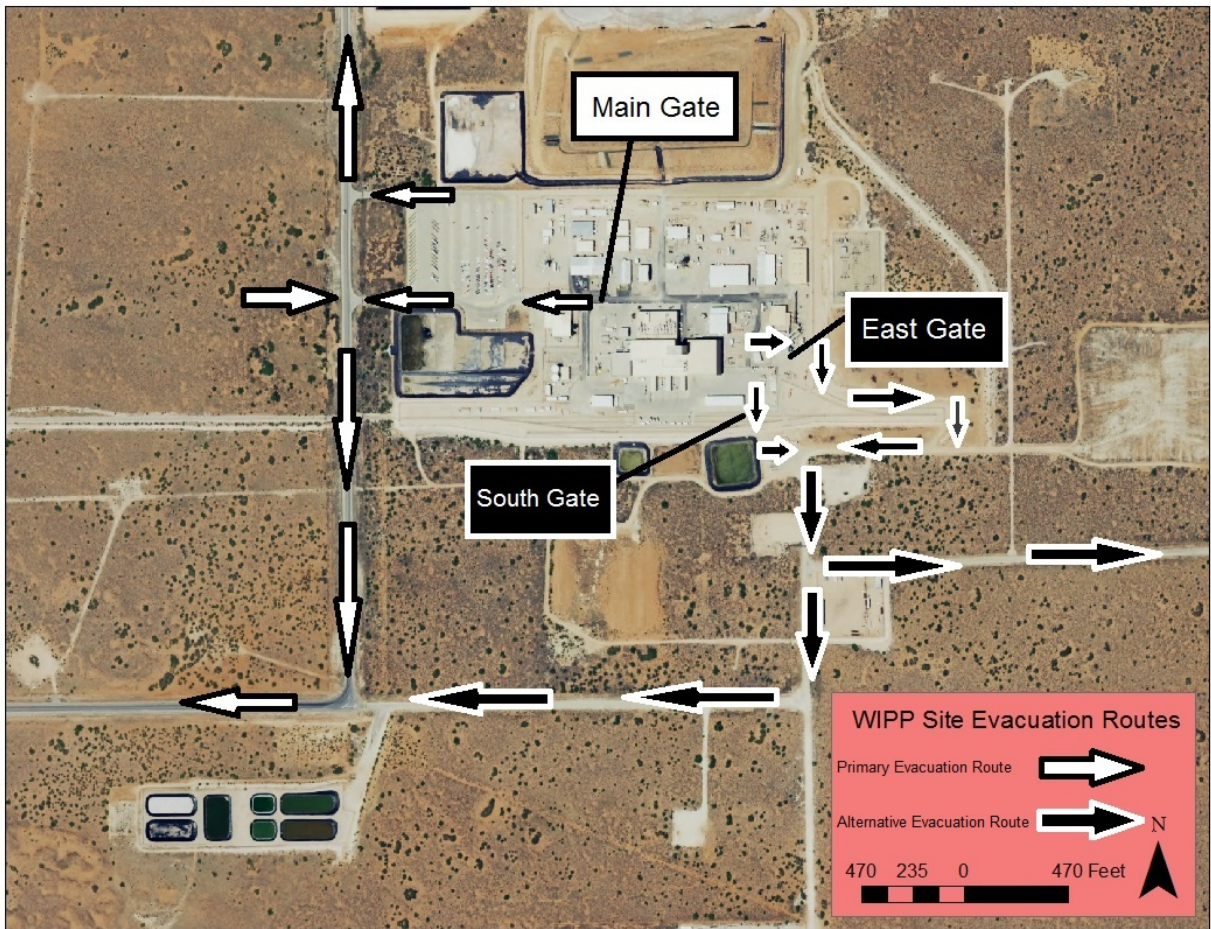
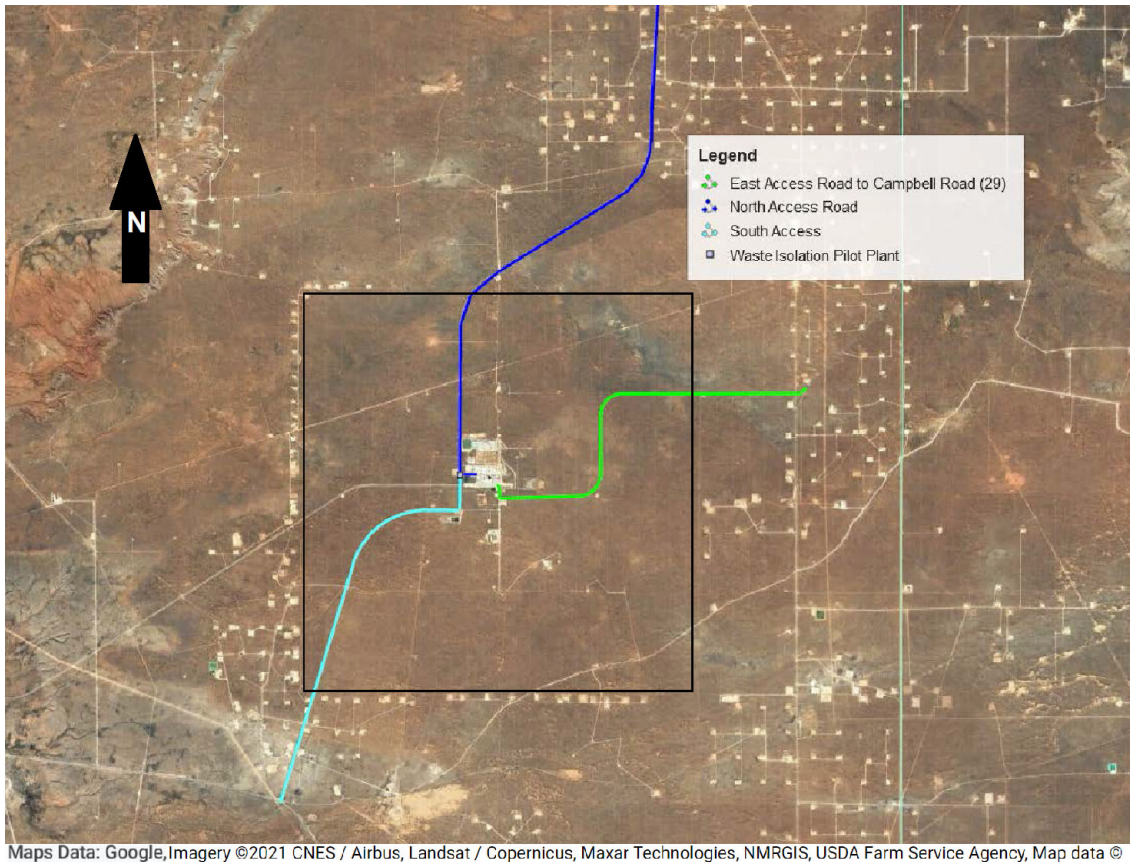


Figure D-8  
WIPP Site Evacuation Map



**Figure D-8a**  
**WIPP Site Evacuation Routes**

**ATTACHMENT E**  
**INSPECTION SCHEDULE, PROCESS AND FORMS**



**ATTACHMENT E**  
**INSPECTION SCHEDULE, PROCESS AND FORMS**

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**Figure** \_\_\_\_\_ **Title**

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### LIST OF TABLES

**Table**

**Title**

Table E-1      Inspection Schedule/Procedures  
Table E-1a     RH TRU Mixed Waste Inspection Schedule/Procedures  
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## ATTACHMENT E

### INSPECTION SCHEDULE, PROCESS AND FORMS

#### Introduction

This Permit Attachment describes the facility inspections (including container inspections) that are conducted to detect ~~malfunctions, deterioration, operator errors, and discharges that may cause or lead to releases of hazardous waste or hazardous waste constituents to the environment or that could be a threat to human health~~malfunctions and deterioration, operator errors, and discharges which may be causing—or may lead to—(1) release of hazardous waste constituents to the environment or (2) a threat to human health, in accordance with 20.4.1.500 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal Regulations (CFR) §264.15(a)).

#### E-1 Inspection Schedule

Equipment instrumental in preventing, detecting, or responding to environmental or human health hazards, such as monitoring equipment, safety and emergency equipment, security devices, and operating or structural equipment are inspected. ~~The equipment will be inspected for malfunctions, deterioration, potential for operator errors, and discharges which could lead to a release of hazardous waste constituents to the environment or pose a threat to human health.~~

The ~~WIPP facility has~~Permittees have developed and ~~will~~ maintain a series of written procedures that include all the detailed inspection procedures and forms ~~necessary used~~ to comply with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)), during the Disposal Phase. Tables E-1 and E-1a list each item or system requiring inspection under these regulations, the inspection frequency, the organization responsible for the inspection, the applicable inspection procedure, and what to look for during the inspection. The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §§264.15(b), 264.174, and 264.602) list requirements that are applicable to the Waste Isolation Pilot Plant (WIPP) facility. Permit Attachment D, Table D-2, Emergency Equipment Maintained at the Waste Isolation Pilot Plant, identifies the emergency equipment and corresponding locations to be inspected in accordance with Table E-1.

The Permittees maintain Operational~~operational~~ procedures detailing the inspections required under 20.4.1.500 NMAC (incorporating 40 CFR §§264.15(a) and (b)), ~~are maintained~~ in electronic format on the WIPP computer network, ~~in the Operating Record~~ and, as appropriate, in controlled document locations at the WIPP facility. Frequency of inspections is discussed in detail in Section E-1a(2). Inspections are conducted often enough to identify problems in time to correct them before they pose a threat to human health or the environment and are based on regulatory requirements. The operational procedures assign responsibility for conducting the inspection, the frequency of each inspection, the types of problems to be watched for, what to do if items fail inspection, and directions on record keeping. ~~The operational procedures are maintained at the WIPP facility. Tables E-1 and E-1a summarize inspections, frequencies, responsible organizations, and the types of anticipated problems as well as the references for the operational procedures.~~ Inspection records are maintained at the WIPP site facility for three years. Beginning with the effective date of this Permit, records that are over the ~~three-year~~three-year retention period are either maintained at the WIPP site facility or transferred to the WIPP Records Archive located in Carlsbad, NM New Mexico until closure. ~~The records maintained at~~

~~the WIPP Records Archive are stored in facilities that are temperature and humidity controlled especially for the long term storage of records and readily retrievable and available for inspection.~~

Waste handling equipment and area inspections are typically controlled through established procedures and the results are recorded in logbooks or on ~~data sheets~~inspection forms. Operators are trained to consult the logbook to identify the status of ~~any a~~ piece of waste handling equipment prior to its use. Once a piece of equipment is identified to be operable, a preoperational or pre-evolution inspection is initiated in accordance with the appropriate inspection procedure in Tables E-1, ~~and E-1a, or in operational procedures~~. Inspection results as described below, are entered in the applicable logbook or data sheet or inspection form.

Inspections include identifying malfunctions or deteriorating equipment and structures. Inspection results and data, including deficiencies, discrepancies, or needed repairs are recorded. A negative inspection result does not necessarily lead to a repair. A deficiency, such as low fluid level, may be corrected by the inspector immediately. A discrepancy, such as an increasing trend of a data point, may necessitate additional inspection prior to the next scheduled frequency. The actions taken (corrected, additional inspection, procurement action, or Action Request (AR) for repair submitted) are recorded on the inspection form, the WIPP automated ~~Maintenance maintenance Management management~~ tracking program ~~(CHAMPS)~~ work order sheet, or the equipment logbook, whichever is applicable.

Items that are operational with restrictions are operated in accordance with applicable compensatory measures. Items that are not operational are scheduled for repair or replacement in accordance with work authorization procedures. In such cases, compensatory measures may be needed until the equipment is returned to service. These compensatory measures will provide an equivalent level of protection, be documented in WIPP facility files (e.g., equipment logbook, inspection form), and include an appropriate inspection schedule, when applicable.

Normally, the individual inspecting the equipment/system is not qualified to make repairs and consequently, prepares an AR if repairs are needed. The AR is tracked by the WIPP automated maintenance management tracking program CHAMPS system through the work-control process. When parts are received and work instructions are completed, the work order can be scheduled. ~~The schedule is discussed daily to ensure facility configuration can support scheduled and work items and to allocate and coordinated~~ d with other facility activities the resources necessary in order to complete the items.

Work orders are released for work by the responsible organization. When repairs are complete the responsible organization tests the equipment to ensure the repairs corrected the problem, then closes out the work order, ~~to and~~ returns the equipment to an operational status ~~for normal operations to resume~~. Implementation of these procedures constitutes compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(c)).

The Permittees meet the Requirements requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15(d)), ~~are met by~~ performing the inspections for each item or system included in Tables E-1 and E-1a. Beginning with the effective date of this Permit, the results of the inspections are maintained in the ~~operating Operating record Record~~ for three years and are then transferred to the WIPP Records Archive where they are maintained until closure. The inspection logs or summary records include the date and time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other

1 remedial actions. Major pieces of waste handling equipment are inspected using proceduralized  
2 inspections. Current copies of inspection forms are ~~maintained in the Operating Record on file at~~  
3 ~~the WIPP facility~~. Non-administrative changes to inspections (i.e., changes that affect the  
4 frequency or content of ~~the inspections~~ schedules) ~~to inspection forms~~ must be submitted to the  
5 NMED in accordance with the appropriate portions of 20 NMAC 4.1.900 (incorporating 40 CFR  
6 §270.42). The status of these pieces of waste handling equipment is ~~maintained~~ recorded in an  
7 equipment logbook that is separate from the checklist. The logbook contains information  
8 regarding the condition of the equipment. Equipment operators are required, by the inspection  
9 checklist, to consult the logbook ~~regarding the status of the equipment as the first activity in the~~  
10 ~~inspection procedure~~. This logbook is maintained in the ~~operating~~ Operating record.  
11 ~~CH~~ Contact-handled (CH) transuranic (TRU) mixed waste equipment that is controlled by a  
12 logbook includes the waste handling forklifts, ~~all~~ waste handling cranes, the adjustable center of  
13 gravity lift fixture, the CH TRU waste underground transporter, the ~~facility~~ transfer vehicles, the  
14 trailer jockey, the Ten-Drum Overpack (TDOP) Upender, the Payload Transfer Station, and the  
15 push-pull attachment. ~~RH~~ Remote-handled (RH) TRU mixed waste equipment that is controlled  
16 by a logbook includes the 140/25-ton RH Bay overhead bridge crane, cask transfer cars, 25-ton  
17 cask unloading room crane, transfer cell shuttle car, RH Bay cask lifting yoke, facility grapple,  
18 6.2-ton overhead hoist, facility cask rotating device, hot cell overhead powered manipulator, 15-  
19 ton hot cell crane, facility cask transfer car, 41-ton forklift, facility cask, and emplacement  
20 equipment. Inspections of the Cask Unloading Room, Hot Cell, Transfer Cell, Facility Cask  
21 Loading Room, and RH Bay ~~and radiation monitoring equipment will be~~ are recorded on ~~data~~  
22 ~~sheets~~ inspection forms. In addition to the inspections listed in Tables E-1 and E-1a, many  
23 pieces of equipment are subject to regular preventive maintenance, ~~which~~ This includes more  
24 in-depth inspections of mechanical systems, load testing of lifting systems, calibration of  
25 measurement equipment and other actions as recommended by the equipment manufacturer  
26 and/or as required by DOE Orders. These preventive maintenance activities, along with the  
27 Permit-required inspections in Tables E-1 and E-1a, make mechanical failure of waste handling  
28 equipment unlikely. The WIPP ~~Safety Analysis Report~~ Documented Safety Analysis (DOE/WIPP-  
29 3372, 1999) ~~and the WIPP Remote-Handled Waste Preliminary Safety Analysis Report (RH~~  
30 ~~PSAR) (DOE, 2000)~~ contains the results of a systematic analysis of waste handling equipment  
31 and the hazards associated with potential mechanical failures. ~~Equipment subject to failures that~~  
32 ~~cannot practically be mitigated is retained for analysis and is the basis for contingency planning.~~  
33 The inspection procedures ~~maintained in the Operating Record~~ kept on file at the WIPP facility  
34 for operational and preventive maintenance are implemented to assure the equipment is  
35 maintained. ~~An example equipment inspection checklist and a typical logbook form are shown~~  
36 ~~as Figures E-1 and E-2. Actual checklists or forms are maintained within the Operating Record.~~

### 37 E-1a General Inspection Requirements

38 Tables E-1, ~~and~~ E-1a, and E-2 of this Permit Attachment list the major categories of monitoring  
39 equipment, safety and emergency systems, security devices, and operating and structural  
40 equipment that are important to the prevention or detection of, or the response to,  
41 environmental or human health hazards caused by hazardous waste. These systems may  
42 include numerous subsystems. These systems are inspected according to the ~~frequency~~  
43 frequencies listed in Tables E-1 and E-1a, ~~a copy of which is maintained at the WIPP facility.~~  
44 The frequency of inspections, which is ~~are~~ based on the nature of the equipment or the hazard  
45 and regulatory requirements. ~~When in use, daily inspections are made of areas subject to spills,~~  
46 ~~such as TRU mixed waste loading and unloading areas in the WHB Unit, looking for~~  
47 ~~deterioration in structures, mechanical items, floor coatings, equipment, malfunctions, etc., in~~  
48 ~~accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)).~~

1 As required in 20.4.1.500 NMAC (incorporating 40 CFR §264.33), the WIPP facility inspection  
2 procedures for communication and alarm systems, fire-protection equipment, and spill control  
3 and decontamination equipment include provisions for testing and maintenance to ensure that  
4 the equipment will be operable in an emergency.

#### 5 E-1a(1) Types of Problems

6 The inspections for the systems, equipment, and structures, ~~etc.~~, listed in Tables E-1 and E-1a,  
7 include the types of problems (e.g., malfunctions; ~~;~~ visible cracks in tubing, coatings, ~~or~~ welds; ~~;~~  
8 and deterioration) to be looked for during the inspection of each item or system, if applicable,  
9 and are in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(3)).

#### 10 E-1a(2) Frequency of Inspections

11 Tables E-1, and E-1a, ~~and E-2 of this Permit Attachment~~ list the inspection frequencies and  
12 monitoring schedule for equipment and systems subject to the 20.4.1 NMAC hazardous waste  
13 management requirements. The frequency is based on the rate of possible deterioration of the  
14 equipment and the probability of an environmental or human health incident if the deterioration  
15 or malfunction, or any operator error, goes undetected between inspections. When in use, daily  
16 inspections are made of areas subject to spills, such as TRU mixed waste loading and  
17 unloading areas in the Waste Handling Building (WHB) Unit, and involve looking for  
18 deterioration in structures, mechanical items, floor coatings, equipment, malfunctions, etc., in  
19 accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)). ~~Areas subject to spills,~~  
20 ~~such as loading and unloading areas, are inspected daily when in use, consistent with the~~  
21 ~~requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)).~~

22 When RH TRU mixed waste is present in the RH Complex, inspections are conducted visually  
23 and/or using closed-circuit video cameras in order to manage worker dose and to minimize  
24 occupational radiation exposures to as low as reasonably achievable (**ALARA**). More extensive  
25 inspections of these areas are performed at least annually during routine maintenance periods  
26 and when RH TRU mixed waste is not present, as identified in Table E-1a.

#### 27 E-1a(3) Monitoring Systems

28 There are two monitoring systems used at the WIPP facility to provide assurance that facility  
29 systems are operating correctly, that areas can be used safely, and that there have been no  
30 releases of hazardous waste constituents. These systems ~~are shown in Table E-2 and~~ include  
31 the geomechanical monitoring system and the central monitoring system (**CMS**). The  
32 geomechanical monitoring system is used to assess the condition of mined excavations to  
33 ~~assure no~~identify the development of unsafe conditions before they are allowed to develop. The  
34 CMS continuously assesses the status of ~~the fixed radiation monitoring equipment,~~ electrical  
35 power, fire alarm systems, ventilation system, and other facility systems including water tank  
36 levels. In addition, the CMS collects data from the meteorological monitoring system. Key  
37 equipment monitored by these two systems are identified in Table E-1 and include a specified  
38 inspection frequency.

1 E-1b Specific Process Inspection Requirements

2 The regulation at 20.4.1.500 NMAC (incorporating 40 CFR §264.15(b)(4)), **requires** inspections  
3 of specific portions of a facility, rather than the general facility. These include container storage  
4 areas and miscellaneous units. Both are addressed below.

5 E-1b(1) Container Inspection

6 ~~The Permittees use Containers containers are used~~ to manage TRU mixed waste at the WIPP  
7 facility. These containers are described in Permit Part 3, Section 3.3.1, and Permit Attachment  
8 A1, Section A1-1b. ~~Off-site waste that will be managed and stored as CH TRU mixed waste will~~  
9 ~~arrive in 55-gallon drums arranged as seven (7) packs, in Ten Drum Overpacks (TDOP), in 85-~~  
10 ~~gallon drums arranged as four (4) packs, in 100-gallon drums arranged as three (3) packs, in~~  
11 ~~standard waste boxes (SWB), in standard large box 2s (SLB2s) or shielded containers as (3)-~~  
12 ~~packs.~~ The waste containers will be visually inspected to ensure that the waste containers  
13 are in good condition and that there are no signs that a release has occurred. This visual  
14 inspection ~~shall~~ does not include the center drums of ~~7~~ seven-packs and waste containers  
15 positioned such that visual observation is precluded due to the arrangement of waste  
16 assemblies on the facility pallets. If CH TRU mixed waste handling operations should stop for  
17 any reason with containers located on-in the TRUPACT-II CH package Unloading Dock (e.g., at  
18 the TRUDOCKs storage area of the WHB Unit) or in room Room 108) while still in the Contact-  
19 Handled Packages, primary waste container inspections ~~could not~~ cannot be accomplished until  
20 the containers of waste are removed from the ~~shipping containers~~ CH package.

21 As described in Permit Attachment A1, Section A1-1d(3), off-site waste ~~that will be~~ managed  
22 and stored as RH TRU mixed waste ~~will arrive~~ in ~~a~~ containers inside Nuclear Regulatory  
23 Commission ~~(NRC)-certified casks designed to provide shielding and facilitate safe handling.~~  
24 ~~Canisters, will be loaded singly into an RH TRU 72-B cask. Drums will be loaded into a CNS 10-~~  
25 ~~160B cask.~~ The cask ~~will be~~ is visually inspected upon arrival. ~~Because RH TRU mixed waste is~~  
26 ~~stored in the Parking Area Unit in sealed casks, there are no additional requirements for~~  
27 ~~engineered secondary containment systems.~~ Following removal of the canisters ~~and or~~  
28 the interior of the cask ~~will be~~ is inspected and surveyed for evidence of contamination that may  
29 have occurred during transport.

30 Off-site waste ~~that will be~~ managed and stored as RH TRU mixed waste is managed and stored  
31 in the RH Complex of the WHB. The RH Complex includes the following: RH Bay, the Cask  
32 Unloading Room, the Hot Cell, the Transfer Cell, and the Facility Cask Loading Room. ~~As RH~~  
33 ~~TRU mixed waste is held in canisters within a canister rack the physical inspection of the drum~~  
34 ~~or canister is not possible.~~ Inspections of RH TRU mixed waste in these areas occurs remotely  
35 via closed-circuit cameras a minimum of once weekly when stored waste is present. ~~Because~~  
36 ~~RH TRU mixed waste is in sealed casks, there are no additional requirements for engineered~~  
37 ~~secondary containment systems. However, the~~ The floors in the RH Complex (including the RH  
38 Bay, Facility Cask Loading Room and Cask Unloading Room) are coated concrete and during  
39 normal operations (i.e., when waste is present), the floor of the RH Complex is inspected  
40 visually or by using close-circuit cameras on a weekly basis to verify that it is in good condition  
41 and free of visible cracks and gaps.

42 Inspections of RH TRU mixed waste containers stored in the Hot Cell and Transfer Cell are  
43 conducted using remotely operated cameras. RH Remote-handled TRU mixed waste in the Hot  
44 Cell is stored in either drums or canisters. The containers in the Hot Cell are inspected to



1 ensure that they are in acceptable condition. ~~RH Remote-handled~~ TRU mixed waste in the  
2 Transfer Cell is stored in the RH-TRU 72-B cask or shielded insert; therefore, inspections in this  
3 area focus on the integrity of the cask or shielded insert. ~~RH Remote-handled~~ TRU mixed waste  
4 in the Facility Cask Loading Room is stored in the facility cask; therefore, inspections in this  
5 area focus on the integrity of the facility cask.

6 Inspections ~~will be~~are conducted in the Parking Area Unit (PAU) at a frequency not less than  
7 once weekly when waste is present and focus on the inventory and integrity of the shipping  
8 containers and the spacing between trailers carrying the CH or RH packages. This aisle spacing  
9 is maintained at a minimum of four feet. These inspections are applicable to loaded ~~Contact-~~  
10 ~~Handled~~CH and ~~Remote-Handled~~RH Packagespackages. ~~The perimeter fence located at the~~  
11 ~~lateral limit of the Parking Area Unit, coupled with personnel access restrictions into the WHB~~  
12 ~~Unit, will provide the needed security. The perimeter fence and the southern border of the WHB~~  
13 ~~shall mark the lateral limit of the Parking Area Unit. Radiologically controlled areas can be~~  
14 ~~established temporarily with barricades. More permanent structures can be installed. The~~  
15 ~~western boundary can be established with temporary barricades since this area is within the~~  
16 ~~perimeter fence. Access to radiologically controlled areas will only be permitted to personnel~~  
17 ~~who have completed General Employee Radiological Training (GERT), a program defined by~~  
18 ~~the Permittees, or escorted by personnel who have completed GERT. This program ensures~~  
19 ~~that personnel have adequate knowledge to understand radiological posting they may~~  
20 ~~encounter at the WIPP site. The fence of the Radiologically Controlled Area, south from the~~  
21 ~~WHB airlocks, was moved to provide more maneuvering space for the trucks delivering waste.~~  
22 Since TRU mixed waste to be stored in the Parking Area UnitPAU ~~will be~~is in sealed ~~Contact-~~  
23 ~~Handled~~CH or ~~Remote-Handled~~RH Packagespackages, there ~~will be~~are no additional  
24 requirements for engineered secondary containment systems. ~~Inspections of the Contact-~~  
25 ~~Handled and Remote-Handled Packages stored in the Parking Area Unit shall be conducted at~~  
26 ~~a frequency no less than once weekly and will focus on the inventory and integrity of the~~  
27 ~~shipping containers and the spacing between trailers carrying the Contact-Handled or Remote-~~  
28 ~~Handled Packages. This spacing will be maintained at a minimum of four feet.~~

29 Container inspections ~~will be~~are included as part of the surface TRU mixed waste handling  
30 areas (~~i.e. Parking Area Unit and WHB Unit~~)-inspections described in Tables E-1 and E-1a.  
31 These inspections ~~will~~also include the Derived Waste Storage Areas of the WHB Unit. ~~The~~  
32 ~~Derived Waste Storage Areas will consist of containers of 55 or 85-gallon drums or SWBs for~~  
33 ~~CH TRU mixed waste and 55-gallon drums for RH TRU mixed waste. A Satellite~~satellite  
34 accumulation area (**SAA**) may be required in an area adjacent to the TRUDOCKs for CH TRU  
35 mixed waste. A SAA may also be required in the RH Bay and Hot Cell for RH TRU mixed  
36 waste. These SAAs will be set up on an as needed basis at or near the point of generation and  
37 the derived waste will be discarded into the active derived waste container. ~~All SAAs~~Satellite  
38 accumulation areas ~~will be~~are inspected in accordance with 20.4.1.300 NMAC (incorporating 40  
39 CFR §262.17).

#### 40 E-1b(2) Miscellaneous Unit Inspection

41 The regulations at 20.4.1.500 NMAC (incorporating 40 CFR §264.602), requires that ~~inspections~~  
42 ~~required in the inspection requirements of~~ 20.4.1.500 NMAC (incorporating 40 CFR §264.15 and  
43 §264.33), as well as any additional inspection requirements needed to protect human health  
44 and the environment, be met. The requirements of 20.4.1.500 NMAC (incorporating 40 CFR  
45 §264.15 and §264.33) are discussed in Section E-1 of this Permit Attachment, along with how  
46 the WIPP facility complies with those requirements for standard types of inspections. Inspection



1 ~~frequencies for geomechanical monitoring equipment are provided in Table E-1. The monitoring~~  
2 ~~schedule for of the~~ geomechanical instrumentation ~~system is given addressed in Table E-2~~E-1.  
3 As described in Permit Attachment A2, Section A2-b(2), the geomechanical monitoring program  
4 at the WIPP facility is an integral part of the ground-control program. Hazardous waste disposal  
5 units, access drifts, the Waste Shaft Station, and the underground transport route are monitored  
6 to provide confirmation of structural integrity. Geomechanical data on the performance of the  
7 repository shafts is collected as part of the shaft inspections. The results of geomechanical  
8 monitoring are reported annually, as identified in Permit Attachment A2, Section A2-b(2).

9 References

10 ~~DOE, 1999. "WIPP Safety Analysis Report," DOE/WIPP-95-2065. Rev. 4, U.S. Department of~~  
11 ~~Energy. Washington, D.C.~~DOE/WIPP-3372. Waste Isolation Pilot Plant Documented Safety  
12 Analysis.

13 ~~DOE, 2000. "WIPP Remote Handled Waste Preliminary Safety Analysis" (RH PSAR), U.S.~~  
14 ~~Department of Energy. Washington, D.C.~~

15

1  
2

**FIGURES**

TYPICAL EQUIPMENT WEEKLY CHECK LIST		
<input checked="" type="checkbox"/> <b>OK</b> <input checked="" type="checkbox"/> <b>Adjustment Made</b> <input type="checkbox"/> <b>Repairs Required</b> AR Written [ ] Yes [ ] No      AR # _____ (check or complete appropriate information)		
ITEM INSPECTED	Condition	Comments/Corrective Action
<b>Mechanical Checks:</b> (examples)		
Oil level		
Radiator fluid level		
Automatic transmission fluid level		
Operate all valves/check gauges		
Emergency brake		
Fuel level (> ¾ full)		
Oil pressure (at warm idle)		
Tire Pressure		
Sirens, horn, & back-up alarm		
<b>Deterioration Checks:</b> (examples)		
Fan belts		
Battery (terminals, cables)		
Run generator 5 min.		
Hose, nozzles & valves		
<b>Leaks/Spills Checks:</b> (examples)		
Leaks around pump		
Foam tank level		
<b>Required Equipment:</b> (examples)		
Inspect SCBAs (> 4050 psi)		
Hand tools & equipment		
Trauma Kit		
<b>Inspected by:</b> _____		
Print Name	Signature	Time/Date
<b>Inspected by:</b> _____		
Print Name	Signature	Time/Date
<b>Reviewed by:</b> _____		
Print Name	Signature	Time/Date
<b>Comments:</b> _____		
_____		
_____		

**NOTE: All items that are mandatory for every inspection form are shown in bold.**

**Figure E-4  
Typical Inspection Checklist**

HOUR METER READING _____ EQUIPMENT NO. _____			
<b>DEFICIENCIES NOTED:</b> _____			
_____			
_____			
PRE OPS COMPLETED PER {Procedure Number} SAT _____ <b>PROBLEMS NOTED</b> _____			
<b>CORRECTIVE ACTIONS TAKEN:</b> _____			
_____			
_____			
_____			
_____			
<b>OPERATOR SIGNATURE</b>	<b>DATE</b>	<b>TIME</b>	<b>SUPERVISOR SIGNATURE/DATE</b>
_____	_____	_____	_____
<b>NOTE: All items that are mandatory for every inspection form are shown in bold.</b>			

**Figure E-2  
Typical Logbook Entry**

## TABLES

**Table E-1  
 Inspection Schedule/Procedures**

<b>System/Equipment Name</b>	<b>Responsible Organization</b>	<b>Inspection<sup>a</sup> Frequency</b>	<b>Procedure Number and Inspection Criteria<sup>h</sup></b>
Air Intake Shaft Hoist	Underground Operations	Preoperational <sup>c</sup>	WP 04-HO1004 Inspecting for Deterioration <sup>b</sup> , Safety Equipment, Communication Systems, and Mechanical Operability <sup>m</sup> in accordance with Mine Safety and Health Administration (MSHA) requirements
Ambulance (Surface) and Medical Cart (Underground)	Fire Department	Weekly	WP 12-FP0030 Inspecting for Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , and Required Equipment <sup>n</sup>
Adjustable Center of Gravity Lift Fixture	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1410 Inspecting for Mechanical Operability <sup>m</sup> and Deterioration <sup>b</sup>
Backup Power Supply Diesel Generators	Facility Operations	Monthly	WP 04-ED1301 Inspecting for Mechanical Operability <sup>m</sup> and Leaks/Spills by starting and operating both generators. Results of this inspection are <del>logged in accordance with WP 04-AD3008</del> <u>recorded on EA04AD3008-47-0</u>
Facility Inspections (Water Diversion Berms)	Facility Engineering	Annually	WP 10-WC3008 Inspecting for Damage, Impediments to water flow, and Deterioration <sup>b</sup>
Central Monitoring Systems (CMS)	Facility Operations	Continuous	Automatic Self-Checking
<del>Contact Handled (CH)</del> TRU Underground Transporter	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1603 <u>WP 05-WH1604</u> Inspecting for Leaks/Spills, Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , <del>and</del> area around transporter clear of obstacles, <u>and on-board automatic fire suppression system</u>
Conveyance Loading Car	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1406 Inspecting for Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , path clear of obstacles, and guards in the proper place

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System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>b</sup>
Facility Transfer Vehicle	Waste <del>Handling</del> Operations	<del>Preoperational</del> <sup>6</sup> Pre-evolution <sup>p</sup>	WP 05-WH1204 <del>Pre-evolution Checks and Operating Instructions,</del> Inspecting for Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , path clear of obstacles, and guards in the proper place
Emergency Lighting	Fire Department	Monthly/ <del>annually</del> Annually	WP 12-FP0051 Inspecting for Deterioration <sup>b</sup> , and Operability of indicator lights in accordance with NFPA 101
Exhaust Shaft	Underground Operations	Quarterly	PM041099 Inspecting for Deterioration <sup>b</sup> <del>and Leaks/Spills</del>
Eye Wash and Shower Equipment	<del>Equipment Custodian</del> Environmental, Safety, Industrial Health	Weekly	WP 12-IS1832 Inspecting for Deterioration <sup>b</sup>
		Semi-annually	WP 12-IS1832 Inspecting for Deterioration <sup>b</sup> and Fluid Levels—Replace as Required
Fire Detection and Alarm System	Fire Protection Engineering	Semi-annually/ <del>annually</del> Annually  Monthly/ <del>quarterly</del> /annually	WP 12-FP0027 Inspecting for Deterioration <sup>b</sup> and Operability of underground fuel station fire suppression system in accordance with NFPA 17 (semi-annual inspection); Inspecting for Deterioration <sup>b</sup> and Operability of the alarm panel and transmitter, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72 (annual inspection) <del>WP 12-FP0028</del> <del>Inspecting for Deterioration<sup>b</sup>, and Operability of the alarm panel and transmitter, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72</del>

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System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>b</sup>
		<u>Monthly/Quarterly/Annually</u>	<u>WP 12-FP0028</u> <u>Inspecting for Deterioration<sup>b</sup>, and Operability of the alarm panel and transmitter, audible/visual alarm devices, detectors, and pull stations in accordance with NFPA 72</u>
Fire Extinguishers <sup>j</sup>	Fire Department	Monthly	WP 12-FP0036 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, Expiration, seals, fullness, and pressure
Fire Hoses	Fire Department	Annually (minimum)	WP 12-FP0031 Inspecting for Deterioration <sup>b</sup> and Leaks/Spills
Fire Hydrants	Fire Protection Engineering	Semi-annual/ <del>annually</del> <u>Annually</u>	WP 12-FP0034 Inspecting for Deterioration <sup>b</sup> and Leaks/Spills
Fire Pumps	Fire Protection Engineering	Weekly	WP 12-FP0026 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, fire water valve position(s), and panel light status
		<del>Annually (Electric Pump)</del>	<del>WP 12-FP5113</del> <del>Inspecting for Deterioration<sup>b</sup>, operability, flow, discharge pressure, suction pressure, and pump speed</del>
		<del>Annually (Diesel Pump)</del>	<del>WP 12-FP5114</del> <del>Inspecting for Deterioration<sup>b</sup>, operability, flow, discharge pressure, suction pressure, and pump speed</del>
		<u>Annually (Electric Pump)</u>	<u>WP 12-FP5113</u> <u>Inspecting for Deterioration<sup>b</sup>, operability, flow, discharge pressure, suction pressure, and pump speed</u>
		<u>Annually (Diesel Pump)</u>	<u>WP 12-FP5114</u> <u>Inspecting for Deterioration<sup>b</sup>, operability, flow, discharge pressure, suction pressure, and pump speed</u>



System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>b</sup>
Fire Sprinkler Systems	Fire Protection Engineering	Monthly  Quarterly  Annually	WP 12-FP0023, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, and water pressures  WP 12-FP0024, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, and water pressures  WP 12-FP0025, WP 12-FP0063, and WP 12-FP0064 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, water pressures, and main drain test
Fire and Emergency Response Vehicles (Fire Trucks, Fire Suppression Cart, and Rescue Cart)	Fire Department	Weekly	WP 12-FP0033 Inspecting for Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , Leaks/Spills, and Required Equipment <sup>n</sup>
<u>Electric Forklifts Used for Waste Handling</u>	<u>Waste Operations</u>	<u>Preoperational<sup>c</sup></u>	<u>WP 05-WH1401</u> <u>WP 05-WH1402</u> <u>WP 05-WH1403</u> <u>Inspecting for Leaks/Spills, Mechanical Operability<sup>m</sup>, Deterioration<sup>b</sup>, and presence of on-board fire extinguisher</u>
<u>Diesel Forklifts Used for Waste Handling (Electric and Diesel forklifts, Push-Pull Attachment)</u>	<u>Waste Handling Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1201, WP 05-WH1207, <del>WP 05-WH1401, WP 05-WH1402, WP 05-WH1403, and</del> WP 05-WH1412 Inspecting for Leaks/Spills, Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , and <del>On-on-</del> board <u>automatic</u> fire suppression system
Automatic on-board fire suppression systems	Fire Protection Engineering	Monthly/Semi-annually	WP 12-FP0085 WP 12-FP0060 Inspecting for Mechanical Operability <sup>m</sup> and Deterioration <sup>b</sup>
Hazardous Material Response Equipment	Fire Department	<del>Quarterly</del> <u>Monthly</u>	WP 12-FP0033 Inspecting for Deterioration <sup>b</sup> , and Required Equipment <sup>n</sup>

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System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>b</sup>
Head Lamps	Facility Personnel	Daily <sup>i</sup>	Head lamps are operated daily and are repaired or replaced upon failure
Miners First Aid Station	Fire Department	Quarterly	WP 12-FP0035 Inspecting for Required Equipment <sup>n</sup>
Mobile Phones	Facility Personnel	Daily <sup>i</sup>	Mobile Phones are operated daily and are repaired or replaced upon failure
Mine Pager Phones (between surface and underground)	Facility Operations	Monthly/Annually <sup>o</sup>	WP 04-PC3017 WP 04-PC3018 Testing of Mine Pager Phones at essential locations
MSHA Air Quality Monitor	Maintenance/ Underground Operations	Daily <sup>i</sup>	WP 12-IH1828 Inspecting for Air Quality Monitoring Equipment Functional Check
Perimeter Fence, Gates, Signs	Security	Daily	WP 17-SS1023 Inspecting for Deterioration <sup>b</sup> and <del>Posted</del> <a href="#">Warnings Required Permit Part 2, Section 2.6.4 warning signs</a>
Mine Rescue Self-Contained Breathing Apparatus (SCBA)	Mine Rescue Team	30 days	WP 12-ER3007 Inspection for Deterioration <sup>b</sup> and Pressure <sup>g</sup>
-Fire Department SCBA	Fire Department	Weekly/ <del>monthly</del> <a href="#">Monthly</a>	WP 12-FP0029 Inspecting for Deterioration <sup>b</sup> and Pressure
Site Notification System; Underground Evacuation Alarm System	Facility Operations	Monthly/Annually	WP 04-PC3017 WP 04-PC3018 Testing of PA and Underground Alarms
Radio Equipment	Facility Personnel	Daily <sup>i</sup>	Radios are operated daily and are repaired or replaced upon failure
Salt Handling Shaft Hoist	Underground Operations	Preoperational <sup>c</sup>	WP 04-HO1002 Inspecting for Deterioration <sup>b</sup> , Safety Equipment, Communication Systems, and Mechanical Operability <sup>m</sup> in accordance with MSHA requirements

System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>b</sup>
Self-Rescuers and Self-Contained Self-Rescuers	Underground Operations	Quarterly	WP 04-AU1026 Inspecting for Deterioration <sup>b</sup> and Functionality in accordance with MSHA requirements
Surface <u>CH</u> TRU Mixed Waste Handling Area <sup>k</sup>	Waste <u>Handling Operations</u>	Preoperational- <sup>c</sup> or Weekly <sup>e</sup>	WP 05-WH1101 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, Required Aisle Space <sup>d</sup> , <u>Posted Warnings Required Permit Part 2, Section 2.6.4 warning signs</u> , Communication Systems, Container Condition, and Floor coating integrity
TRU Mixed Waste Decontamination Equipment	Waste <u>Handling Operations</u>	Annually	WP 05-WH1101 Inspecting for Required Equipment <sup>f</sup>
Underground Openings—Roof Bolts and Travelways	Underground Operations	Weekly	WP 04-AU1007 Inspecting for Deterioration <sup>b</sup> of Accessible Areas
Underground—Geomechanical Instrumentation System (GIS)	Geotechnical Engineering	Monthly	WP 07-EU1301 Inspecting for Deterioration <sup>b</sup>
Underground TRU Mixed Waste Disposal Area	Waste <u>Handling Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1810 Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, mine pager phones, <u>equipment</u> , unobstructed access, <u>required Permit Part 2, Section 2.6.4 warning signs</u> , debris, and ventilation
Uninterruptible Power Supply (Central UPS)	Facility Operations	Daily	WP 04-ED1542 Inspecting for Mechanical Operability <sup>m</sup> and Deterioration <sup>b</sup> with no malfunction alarms. Results of this inspection are <u>logged in accordance with WP 04-AD3008-recorded on EA04AD3008-20-0</u>
TDOP Upender	Waste <u>Handling Operations</u>	<u>Preoperational-<sup>e</sup>Pre-evolution<sup>p</sup></u>	WP 05-WH1010 <u>Pre-evolution Checks and Operating Instructions</u> , Inspecting for Mechanical Operability <sup>m</sup> and Deterioration <sup>b</sup>

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System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>b</sup>
Waste Handling Cranes	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1407 Inspecting for Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , and Leaks/Spills
Waste Hoist	Underground Operations	Preoperational <sup>c</sup>	WP 04-HO1003 Inspecting for Deterioration <sup>b</sup> , Safety Equipment, Communication Systems, and Mechanical Operability <sup>m</sup> , Leaks/Spills, in accordance with MSHA requirements
Water Tanks	Facility Operations	Daily	WP 04-AD3008 Inspecting for Deterioration <sup>b</sup> , valve lineup, and water levels. Results of this inspection are <del>logged in accordance with WP 04-AD3008</del> recorded on <u>EA04AD3008-12-0 and EA04AD3008-13-0</u>
Push-Pull Attachments	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1401 <u>WP 05-WH1412</u> Inspecting for Damage, <u>Mechanical Operability<sup>m</sup></u> , and Deterioration <sup>b</sup>
Trailer Jockey	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1405 Inspecting for Leaks/Spills, Mechanical Operability <sup>m</sup> and Deterioration <sup>b</sup>
Closure Bulkheads	Underground Operations	Semi-annually	PM000011 <del>PM000015</del> Integrity and Deterioration <sup>b</sup> <del>of</del> <u>in</u> Accessible Areas
Bolting Robot	Waste <del>Handling</del> <u>Operations</u>	Preoperational <sup>c</sup>	WP 05-WH1203 Mechanical Operability <sup>m</sup>
Yard Transfer Vehicle	Waste <del>Handling</del> <u>Operations</u>	<del>Preoperational<sup>c</sup></del> <u>Pre-evolution<sup>p</sup></u>	WP 05-WH1205 <u>Pre-evolution Checks and Operating Instructions</u> , Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , Path clear of obstacles and Guards in proper place
Payload Transfer Station	Waste <del>Handling</del> <u>Operations</u>	<del>Preoperational<sup>c</sup></del> <u>Pre-evolution<sup>p</sup></u>	WP 05-WH1208 <u>Pre-evolution Checks and Operating Instructions</u> , Mechanical Operability <sup>m</sup> , Deterioration <sup>b</sup> , and Guards in proper place

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System/Equipment Name	Responsible Organization	Inspection <sup>a</sup> Frequency	Procedure Number and Inspection Criteria <sup>h</sup>
Monorail Hoist	Waste <del>Handling</del> Operations	<del>Preoperational</del> <sup>L</sup> <u>Pre-evolution<sup>p</sup></u>	WP 05-WH1202 <u>Pre-evolution Checks and Operating Instructions</u> , Mechanical Operability <sup>m</sup> , Deterioration <sup>p</sup> , and Leaks/Spills
Bolting Station	Waste <del>Handling</del> Operations	Preoperational <sup>c</sup>	WP 05-WH1203 Mechanical Operability <sup>m</sup> , Deterioration <sup>p</sup> , and Guards in proper place

**Table E-1 (Continued)**  
**Inspection Schedule/Procedures Notes**

- a Inspection may be accomplished as part of or in addition to regularly scheduled preventive maintenance inspections for each item or system. Certain structural systems of the WHB, ~~and~~ Waste Hoist ~~and Station A~~ are also subject to inspection following severe natural events including earthquakes, tornados, and severe storms. Structural systems include columns, beams, girders, anchor bolts and concrete walls.
- b Deterioration includes: obvious visible cracks, erosion, salt build-up, damage, corrosion, loose or missing parts, malfunctions, and structural deterioration.
- c "Preoperational" signifies that inspections are required prior to the first use during a calendar day. For calendar days in which the equipment is not in use, no inspections are required. For an area this includes: area is clean and free of obstructions (for emergency equipment); adequate aisle space; emergency and communications equipment is readily available, properly located and sign-posted, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and switch positions, battery charge levels, pressures, general cleanliness, and that all functional components and emergency equipment is present and operational.
- e These weekly inspections apply to container storage areas when containers of waste are present for a week or more.
- g Inspections are performed per manufacturer's maintenance instructions.
- h Inspections and PM's are not required for equipment that is out of service. However, if compensatory measures have been established to ensure an equivalent level of protection during the period that the equipment is out of service (e.g., required equipment/supplies from an out-of-service emergency vehicle have been temporarily relocated), appropriate inspections will be scheduled, conducted, and documented in the Operating Record, in accordance with Attachment E, Section E-1.
- i Head Lamps, Mobile Phones, and Radios are not routinely "inspected." They are typically used in day-to-day operations. They are used until they fail, at which time they are replaced and repaired.
- j Fire extinguisher inspections are performed in accordance with NFPA 10.
- k Surface CH TRU mixed waste handling areas include the ~~Parking Area Unit~~PAU, the WHB unit, and unloading areas.
- l No log forms are used for daily readings. However, readings that are out of tolerance are reported to the CMR and logged by CMR operator. Inspection includes daily functional checks of portable equipment.
- m Mechanical Operability means that the equipment has been checked and is operating in accordance with site safety requirements (e.g., proper fluid levels and tire pressure; functioning lights, alarms, sirens, and power/battery units; and belts, cables, nuts/bolts, and gears in good condition), as appropriate.
- n Required Equipment means that the equipment identified in Table D-2 is available and usable (i.e., not expired/depleted and works as designed).
- o Mine pager phones in non-essential locations are not routinely "inspected". Many are used in day-to-day operations. They are used until they fail, at which time they are repaired. Mine pager phones are used routinely by Underground Operations.
- p "Pre-evolution" signifies that inspections are required prior to equipment use in the waste handling process. A TRUPACT-III shipment evolution is considered to be the process that begins with placing a loaded TRUPACT-III package on the Yard Transfer Vehicle (YTV) in the PAU, includes waste storage in the WHB Unit, and ends when the empty TRUPACT-III is removed from the YTV in the PAU. Additionally, a TDOP-Upender evolution is considered to be the process that begins with the empty TDOP placed on the Upender, and ends with storage of the overpacked waste container in the WHB Unit.
- q In the PAU, the aisle spacing between trailers carrying the CH or RH packages are maintained at a minimum of four feet. In the CH Bay Storage Area of the WHB Unit, a minimum aisle space of 44 inches between loaded facility pallets is maintained. Also, in the CH Bay, a minimum aisle space of 44 inches is maintained between the walls of the CH Bay and a loaded facility pallet.

**Table E-1a  
RH TRU Mixed Waste Inspection Schedule/Procedures**

System/ Equipment Name	Responsible Organization <sup>di</sup>	Inspection <sup>a</sup> Frequency	Procedure Number (Latest Revision) <sup>i</sup>	Inspection Criteria		
				Deterioration <sup>b</sup>	Leaks/ spills	Other
Cask Transfer Car(s)	Waste Operations	Pre-evolution <sup>c,d,e</sup>	WP_05- WH1701  <del>PM041187 (Semi-Annual)</del>	Yes	NA	Pre-evolution Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication</del>
RH Bay Overhead Bridge Crane	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP_05- WH1741  <del>PM041232 (Quarterly) PM041117 (Annual)</del>	Yes	Yes	Pre-operational Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication</del>
Facility Cask	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP05-WH1713  <del>PM041204 (Annual) PM041203 (Annual)</del>	Yes	<del>NA</del> Yes	Pre-evolution Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication. Electrical PM.</del>
RH Bay Cask Lifting Yoke	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP_05- WH1741  <del>PM041169 (Annual)</del>	Yes	NA	Pre-operational Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication</del>
Facility Cask Transfer Car	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP_05- WH1704  PM041186 (Quarterly) PM041195 (Annual)	Yes	Yes	Pre-evolution Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication Electrical Inspection</del>
Facility Cask Rotating Device	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP05-WH1713  <del>PM041175 (Annual) PM041176 (Annual)</del>	Yes	Yes	Pre-evolution Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication Electrical Inspection</del>
Facility Grapple	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP_05- WH1721  <del>PM041172 (Quarterly) PM041177 (Annual)</del>	Yes	NA	Pre-evolution Checks and Operating Instructions.  <del>Mechanical Inspection for Wear. Non-Destructive Examination</del>
6.25-Ton Grapple Hoist	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP05-WH1721  <del>PM411028 (Annual)</del>	Yes	Yes	Pre-evolution Checks and Operating Instructions.  <del>Mechanical Inspection for Wear and Lubrication</del>

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System/ Equipment Name	Responsible Organization <sup>d,i</sup>	Inspection <sup>a</sup> Frequency	Procedure Number (Latest Revision) <sup>j</sup>	Inspection Criteria		
				Deterioration <sup>b</sup>	Leaks/ spills	Other
Transfer Cell Shuttle Car	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP_05-WH1705 <del>PM041184 (Semi-Annual)</del> <del>PM041222 (Annual)</del>	Yes	Yes	Pre-evolution <del>Pre-operational</del> Checks and Operating Instructions. <del>Mechanical Inspection for Wear and Lubrication.</del> <del>Electrical Inspection.</del>
Hot Cell Overhead Powered Manipulator	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP_05-WH1743 <del>PM041215 (Annual)</del> <del>PM041216 (Annual)</del> <del>IC411037 (Annual)</del>	Yes	Yes	Pre-operational Checks and Operating Instructions. <del>Mechanical Inspection for Wear and Lubrication.</del> <del>Electrical Inspection.</del> <del>Load Cell Calibration</del>
Hot Cell Bridge Crane	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP_05-WH1742 <del>PM041217 (Annual)</del> <del>PM041209 (Annual)</del> <del>IC411038 (Annual)</del>	Yes	Yes	Pre-operational Checks and Operating Instructions. <del>Mechanical Inspection for Wear and Lubrication.</del> <del>Electrical Inspection.</del> <del>Load Cell Calibration.</del>
Closed Circuit Television Camera	Waste Operations	Preoperational <sup>c,i</sup>	WP_05-WH1757	NA	NA	Operability
<del>Radiation Monitoring Equipment</del>	<del>Radiation Control</del>	<del>Preoperational<sup>e,d,e</sup></del>	<del>WP12-HP1245</del> <del>IC240010</del> <del>WP12-HP1307</del> <del>IC534000</del> <del>WP12-HP1314 (Annual)</del>	<del>Yes</del>	<del>NA</del>	<del>Operability Checks, Functional Checks, Instrument calibrations, Flow Calibration, Efficiency Checks.</del>
Cask Unloading Room Crane	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP_05-WH1719 <del>PM041190 (Quarterly)</del> <del>PM041191 (Annual)</del> <del>PM041192 (Annual)</del> <del>IC411035 (Annual)</del>	Yes	Yes	Pre-operational Checks and Operating Instructions. <del>Mechanical Inspection for Wear and Lubrication.</del> <del>Electrical Inspection.</del> <del>Load Cell Calibration.</del>



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System/ Equipment Name	Responsible Organization <sup>d,l</sup>	Inspection <sup>a</sup> Frequency	Procedure Number (Latest Revision) <sup>i</sup>	Inspection Criteria		
				Deterioration <sup>b</sup>	Leaks/ spills	Other
Horizontal Emplacement Machine and Retrieval Equipment or functionally equivalent equipment	Waste Operations	Pre-evolution <sup>c,d,e,f</sup>	WP 05- WH1733* <del>WP05-WH1700</del> PM052010 (Semi-Annual) <sup>k</sup> PM052011 (Annual) PM052013 PM052012 PM052014 (Annual)	Yes	Yes	Assembly and Operating Instructions. <del>Electrical Inspection. Position Transducer Calibration. Tilt Sensor Calibration.</del> * Procedure WP 05- WH1733 is currently not active. The procedure number has been designated for the Horizontal Emplacement Machine when activities are initiated to support resumption of RH waste emplacement.
41-Ton Forklift	Waste Operations	Preoperational <sup>c,d,e,i</sup>	WP 05- WH1602 <del>PM074064</del> PM052003 (Hours of Use) PM074027 (Quarterly) PM074029 & PM074051 (Annual)	Yes	Yes	Pre-Operational Checks and on-board automatic fire suppression system PM performed every 100 hours of operation, every 500 hours of operation or every 5 Years. Quarterly Engine Emission Test. Annual Electrical Inspection. Annual NDE.
Surface RH TRU Mixed Waste Handling Area	Waste Operations	Preoperational <sup>c,d,e,f,g,h,j</sup>	WP-05 WH1744	Yes	Yes	Inspecting for Deterioration <sup>b</sup> , Leaks/Spills, Required Aisle Space <sup>m</sup> , Required Permit Part 2, Section 2.6.4 warning signs, Posted Warning, Communications, Systems, Container Conditions, and Floor Coating Integrity.

**Table E-1a (Continued)**  
**RH TRU Mixed Waste Inspection Schedule/Procedures Notes**

- a Inspection may be accomplished as part of or in addition to regularly scheduled preventive maintenance inspections for each item or system. Certain structural systems of the WHB are also subject to inspection following severe natural events including earthquakes, tornados, and severe storms. Structural systems include columns, beams, girders, anchor bolts, and concrete walls.
- b Deterioration includes: visible cracks, erosion, salt build-up, damage, corrosion, loose or missing parts, malfunctions, and structural deterioration.
- c "Pre-evolution" signifies that inspections are required prior to equipment use in the waste handling process. (An evolution is considered to be from the receipt of a cask into the RH Bay through canister emplacement in the underground.) For an area, preoperational inspection includes: area is clean and free of obstructions (for emergency equipment); adequate aisle space; emergency and communications equipment is readily available, properly located and sign-posted, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and switch positions, battery charge levels, pressures, general cleanliness, and that functional components and emergency equipment are present and operational. When the equipment is not in use, no inspections are required.
- d When equipment needs to be inspected while handling waste (i.e., during waste unloading or transfer operations), general cleanliness and functional components will be inspected to detect any problem that may harm human health or the environment. The inspection will verify that emergency equipment is present.
- e Inspection of RH TRU mixed waste equipment and areas in the RH Complex applies only after RH TRU mixed waste receipt begins.
- f The inspection/maintenance activities associated with these pieces of equipment are performed when the RH Complex is empty of RH TRU mixed waste. If contamination is present, a radiation work permit may be needed.
- g For the Hot Cell and Transfer Cell, if RH TRU mixed waste is present, camera inspections will be performed in lieu of physical inspection.
- h The integrity of the floor coating will be inspected weekly if RH TRU mixed waste is present.
- i "Preoperational" signifies that inspections are required prior to the first use in a calendar day. For an area, preoperational inspection includes: area is clean and free of obstructions (for emergency equipment); adequate aisle space; emergency and communications equipment is readily available, properly located and sign-posted, visible, and operational. For equipment, this includes: checking fluid levels, pressures, valve and switch positions, battery charge levels, pressures, general cleanliness, and that functional components and emergency equipment are present and operational. When the equipment is not in use, no inspections are required.
- j Responsible organizations refers to the organization that owns the equipment. Preventive Maintenance (PM) procedures are conducted by either mine maintenance or surface operations maintenance personnel and Instrument Calibration (IC) procedures are conducted by instrument and calibration maintenance personnel.
- k Inspection will be performed after 250 evolutions (actual and training emplacements), if such usage occurs prior to the semi-annual inspection.
- l Inspections ~~and PM's~~ are not required for equipment that is out of service.
- m In the RH Bay of the WHB Unit, a minimum aisle space of 44 inches between loaded casks is maintained. For other locations within the RH Complex, sufficient aisle space is maintained to assure that emergency equipment can be assessed or moved to the necessary locations.

**Table E-2  
 Monitoring Schedule**

<b>System/Equipment Name</b>	<b>Responsible Organization</b>	<b>Monitoring Frequency</b>	<b>Purpose</b>
Geomechanical <sup>b</sup>	Geotechnical Engineering	Monthly	To evaluate the geotechnical performance of the underground facility and to detect ground conditions that could affect operational safety
Central Monitoring System	Facility Operations	System Dependent	Monitor and provide status for the following facility parameters: Electrical Power Status <sup>d</sup> Fire Alarm System <sup>e</sup> Ventilation System Status <sup>f</sup> Meteorological Data System <sup>g</sup> Facility Systems (compressors <sup>g</sup> , pumps <sup>h</sup> , water tank levels <sup>i</sup> , waste hoists <sup>j</sup> )

<sup>b</sup>—Equipment is listed as Underground Geomechanical Instrumentation System (GIS) in Table E-1.

<sup>d</sup>—Equipment listed as Backup Power Supply Diesel Generator in Table E-1.

<sup>e</sup>—Equipment listed as Fire Detection and Alarm System in Table E-1.

<sup>f</sup>—Equipment listed as Ventilation Exhaust in Table E-1.

<sup>g</sup>—Not RCRA equipment.

<sup>h</sup>—Equipment listed as Fire Pumps in Table E-1.

<sup>i</sup>—Equipment listed as Water Tank Level in Table E-1.

<sup>j</sup>—Equipment listed as Waste Hoist in Table E-1.

**ATTACHMENT F**  
**FACILITY PERSONNEL PERMIT TRAINING PROGRAM**

**ATTACHMENT F**  
**FACILITY PERSONNEL PERMIT TRAINING PROGRAM**

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## ATTACHMENT F

### FACILITY PERSONNEL PERMIT TRAINING PROGRAM

#### F-0 Introduction

This attachment describes the *Facility Personnel Permit Training Program* for the Waste Isolation Pilot Plant (**WIPP**) facility in accordance with the requirements of the Resource Conservation and Recovery Act (**RCRA**) and the New Mexico Hazardous Waste Act as described in 20.4.1.500 New Mexico Administrative Code (**NMAC**) (incorporating Title 40 of the Code of Federal Regulations (CFR) §264.16), and 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(12)).

The primary objective of the *Facility Personnel Permit Training Program* is to prepare facility personnel to operate and maintain the WIPP facility in a safe and environmentally sound manner in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.16). To achieve this objective, the program provides WIPP facility employees with training relevant to their positions.

~~Waste Isolation Pilot Plant~~WIPP facility employees, including those not directly involved in transuranic (**TRU**) mixed waste handling activities or emergency response, receives an introduction to the RCRA regulations and emergency preparedness in their General Employee Training (**GET**) class. General Employee Training emphasizes that WIPP facility personnel and site visitors are required to comply with directions from emergency personnel and alarm system notifications and to follow instructions concerning emergency equipment, shutdown procedures, signage, and emergency evacuation routes and exits. In this way employees at the WIPP facility are given, at a minimum, a basic understanding of the regulatory requirements and emergency procedures. This ensures that facility employees know how to respond effectively to emergencies through familiarization with emergency procedures, emergency equipment, and emergency systems. ~~Facility Employees~~employees in TRU mixed waste management or emergency response positions receive additional classroom and on-the-job training designed specifically to teach them how to perform their duties safely and in conformance with regulatory requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). ~~TRU-Transuranic~~ mixed waste management personnel receive the required training before being allowed to work unsupervised, and emergency response personnel receive appropriate training before being called upon to respond to actual emergencies.

The training requirements of the *Facility Personnel Permit Training Program* are implemented via the WIPP Training Program and apply to appropriate facility personnel of the U.S. Department of Energy (**DOE**) and contractors, subcontractors, and bargaining-unit members who;

- Regularly work at the facility that may come in contact with and/or manage TRU mixed waste, or
- Oversee the operations of the facility that may come in contact with and/or manage TRU mixed waste, or
- Supervise individuals who may come in contact with and/or manage TRU mixed waste, or
- Provide emergency response capabilities.

1 This *Facility Personnel Permit Training Program* describes the introductory and continuing  
2 training provided to personnel at the WIPP facility, with emphasis on those facility personnel and  
3 their supervisors whose jobs are such that their actions or failure to act could result in a spill or  
4 release, or the immediate threat of a spill or release of TRU mixed waste.

5 This *Facility Personnel Permit Training Program* does not apply to facility employees who  
6 manage site-generated hazardous waste, low-level waste, universal waste, or other forms of  
7 hazardous waste that are not categorized as TRU mixed waste.

#### 8 F-1 Outline of the Facility Personnel Permit Training Program

9 Employee training for the purpose of TRU mixed waste management and emergency response  
10 at the WIPP facility is the overall responsibility of the Management and Operating Contractor  
11 ~~(MOC)~~ Project Manager, with responsibility for implementation delegated to Technical Training.  
12 Technical Training is managed by the Technical Training Manager. The Technical Training  
13 Manager (or designee) has the responsibility for directing the *Facility Personnel Permit Training*  
14 *Program*. The list of job titles in Table F-1 ~~presents~~ identifies the jobs at the WIPP facility that  
15 include the personnel with identified responsibilities for TRU mixed waste management and  
16 emergency response.

#### 17 F-1a Facility Personnel Permit Training Program Design

18 In developing the *WIPP Training Program*, Technical Training has used a modified version of  
19 the Systematic Approach to Training (SAT) which has five distinct phases to develop training  
20 programs. These phases are:

- 21 • Analysis
- 22 • Design
- 23 • Development
- 24 • Implementation
- 25 • Evaluation

26 Technical Training utilizes guidance provided within the DOE Handbooks, “Training Program  
27 Handbook: A Systematic Approach to Training (DOE-HDBK-1078-94),” and “Alternative  
28 Systematic Approaches to Training (DOE-HDBK-1074-95)” to direct these five phases.

29 Technical Training ensures that Permit-required training is conducted by qualified instructors as  
30 indicated in the *WIPP Training Program*.

31 Cognizant line managers provide significant input on training requirements for ~~the~~ WIPP facility  
32 personnel to qualified instructors who develop the following, as required:

- 33 • Classroom Instruction
- 34 • Required reading, structured self-study, eLearning, computer-based training
- 35 • On-the-Job Training

36 Upon completion of the specific classroom, ~~computer based~~ computer-based training, eLearning  
37 or structured self-study technical training courses, trainees must successfully complete written  
38 (includes in person examinations, computer, and web based training examinations) or oral  
39 examinations to demonstrate competency.

1 Technical training documentation and records are maintained by Technical Training located at  
2 the WIPP facility. Documents and records required by 20.4.1.500 NMAC (incorporating 40 CFR  
3 §264.16(d)(1), (2), (3), and (4) are maintained in WIPP facility files and include the following:

- 4 • Job titles for positions related to TRU mixed waste management and emergency  
5 response and names of the employee filling those positions
- 6 • Written job descriptions for the applicable positions
- 7 • Written description of the type and amount of introductory and continuing training  
8 given for each applicable position
- 9 • Records documentation that the training or job experience required has been  
10 given to or completed by facility personnel include as appropriate:
  - 11 0 Course Attendance
  - 12 0 Completed Qualification Cards
  - 13 0 Off-Site Training Documentation
  - 14 0 Training or job experience given and completed for each position

15 Documentation is maintained which ~~included~~includes records of training qualifications, and  
16 course attendance. The documentation is used to identify course refresher and requalification  
17 dates. Training records on current personnel are kept in the Technical Training files until facility  
18 closure. Technical training records on former employees are kept by Technical Training for at  
19 least three years from the date of employment termination from the WIPP facility. Training  
20 documentation for emergency response training received by personnel called out in the *RCRA*  
21 *Contingency Plan* (Permit Attachment D) is also maintained by Technical Training.

#### 22 F-1b Job Title/Job Description

23 Facility personnel who are involved in TRU mixed waste management and emergency response  
24 activities receive the same core RCRA training. A list of TRU mixed waste management and  
25 emergency response job titles and position descriptions is provided in Table F-1. An up-to-date  
26 list of personnel assigned to these positions is maintained in WIPP facility files by the  
27 Permittees in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d)(1)). The  
28 core TRU mixed waste management and emergency response training courses are indicated in  
29 Table F-2. Any changes to the Facility Personnel Permit Training Program specified training  
30 course materials (contained in WIPP facility files) that affect the Table F-2 training course  
31 content will be evaluated to determine if a permit modification is required, as specified in  
32 20.4.1.900 NMAC (incorporating 40 CFR §270.42 The job titles listed in Tables F-1 include:

- 33 • Emergency Coordinator
- 34 • TRU Mixed Waste Worker
- 35 • TRU Mixed Waste Worker Supervisor
- 36 • Inspector
- 37 • RCRA Training Director
- 38 • Emergency Responder



1 F-1b(1) Training Content

2 To ensure that facility personnel are knowledgeable in responding effectively to emergency  
3 situations, every employee, regardless of whether they hold a position in TRU mixed waste  
4 management or emergency response, receives GET and the annual GET refresher training on  
5 topics relevant to the management of TRU mixed waste and emergency response that include:

- 6 • Emergency Preparedness and Response
- 7 • RCRA (including the Permit and the RCRA Contingency Plan)
- 8 • Fire Protection
- 9 • Safety Signage

10 Training course updates are identified by periodically reviewing the Table F-2 Permit-required  
11 training courses to ensure the content remains consistent with applicable Federal and State  
12 regulations. This review will be performed in accordance with the *WIPP Training Program* and  
13 the review will be documented in the WIPP facility files.

14 To facilitate identification of changes to Table F-2 Permit-required training courses, changes to  
15 training course materials, which will be maintained in the WIPP facility files, will have revision  
16 numbers and a change history summary. This training course information will be available for  
17 NMED inspection upon request.

18 F-1b(2) Training Frequency

19 Transuranic TRU-mixed waste management and emergency response courses are offered at a  
20 frequency that ensures new hires or transfers can receive relevant Permit-specified training  
21 within six months of assuming their new position ~~(although some emergency response training~~  
22 ~~may require longer time periods to complete certifications)~~. Annual refresher training is required  
23 for each Permit course. Employees do not work unsupervised in TRU mixed waste  
24 management positions until they have completed the Permit-required initial training. In cases  
25 where an employee's annual refresher training has lapsed, that employee cannot work  
26 unsupervised until the initial training has been repeated. The cognizant manager notifies the  
27 Human Resources Department who notifies the training staff when any employee is transferred  
28 into or out of a position associated with TRU mixed waste management or emergency  
29 response.

30 F-1b(3) Training Techniques

31 A variety of instructional techniques are used at the WIPP facility depending on the subject  
32 matter and the techniques that best suit the learning objectives. Many courses may include a  
33 combination of classroom, on-the-job training, computer-based training, eLearning, self-paced  
34 study, laboratory work, and/or comprehensive examinations. Most equipment operation courses  
35 include hands-on practical instruction.

36 Written examinations (includes in person examinations, computer, and web based training  
37 examinations) are used as a technique to test and document the knowledge level of individuals  
38 participating in classroom training courses. The length and content of each exam varies  
39 according to its objective. If individuals fail a written examination, in accordance with WIPP  
40 training procedures, they are disqualified from working unsupervised for the role or task

1 associated with the failed training until the training course examination has been successfully  
2 completed.

3 On-the-job training at the WIPP facility follows a prescribed set of standards specific to the job  
4 to be performed. Typically, to become qualified to operate a piece of equipment or system,  
5 employees must be able to demonstrate the location and purpose of specified controls and  
6 gauges, describe proper startup and shutdown procedures, describe specific safety features  
7 and limitations of the equipment, and, in some cases, perform maintenance functions. They  
8 must also demonstrate the ability to operate the equipment or system. On-the-job training may  
9 also be function specific, such as performing a specific administrative function that is regulated.  
10 The terms "on-the-job-training," "on-the-job-evaluation," and "job performance measures" are  
11 considered equivalent with respect to training courses or qualification cards in accordance with  
12 DOE-HDBK-1074-95.

13 In addition to on-the-job training, some positions require the trainee to attend an oral board. The  
14 oral board is given upon completion of on-the-job training and prior to operating any equipment  
15 unsupervised. In the oral board, the trainee is quizzed on knowledge learned in on-the-job  
16 training. The purpose of the oral board is to determine if the trainee fully understands and can  
17 apply the knowledge learned in the training process.

18 Individuals who provide evidence of equivalency for specific requirements or prerequisites  
19 identified in the Table F-2 Permit-required training courses may be granted an exception from  
20 further training to those requirements in accordance with the *WIPP Training Program*. Requests  
21 for exceptions/equivalences are made and evaluated in accordance with the *WIPP Training*  
22 *Program*. Training exceptions/equivalences must be approved by the RCRA Training Director  
23 with concurrence of the Environmental Compliance Manager or his/her designee. Each  
24 exception/equivalency request is evaluated per specific criteria, such as 1) completion of  
25 previous training (transcripts, training completion records), 2) previous experience  
26 (résuméresume) that demonstrates the application of knowledge and/or skills presented by  
27 course objectives, and 3) satisfactory completion of an examination having equivalent course  
28 objectives. Each exception/equivalency will be granted in writing and documented in the  
29 individual's training record.

30 F-1c Technical Training Manager (RCRA Training Director)

31 The Technical Training Manager (or designee) directs the *Facility Personnel Permit Training*  
32 *Program*, implemented via the *WIPP Training Program*, and is responsible for establishing  
33 technical training requirements in cooperation with the line managers. Specifically, this includes  
34 analysis, design, development, implementation, and evaluation of technical training. The  
35 Technical Training Manager (or designee) is trained in hazardous waste management  
36 procedures. The Technical Training Manager (or designee) is also required to be  
37 knowledgeable of the applicable regulations, orders, guidelines, and the specific training  
38 process employed at the WIPP facility.

39 The name and qualifications of the current Technical Training Manager are documented in  
40 WIPP facility files.

1 F-1d Relevance of Training to Job Position

2 The *WIPP Training Program* provides employees and their supervisors with training relevant to  
3 their positions. The SAT process mentioned in Section F-1a is a systematic method for  
4 determining the proper training for each TRU mixed waste management position. It compels  
5 managers and training staff to look critically at each position and determine the necessary  
6 training program for each employee to perform their work in a manner that protects human  
7 health and the environment and complies with the Permit.

8 Several training topics are considered relevant for all WIPP facility personnel. The basic  
9 philosophy at the WIPP facility is that, as a RCRA-regulated facility, facility personnel must  
10 understand the basic regulatory requirements under which the WIPP facility must operate as  
11 well as emergency actions required of facility personnel. Therefore, ~~all~~ WIPP facility personnel  
12 receive an introduction to the RCRA during their GET.

13 Beyond these universal topics, training is designed and implemented relevant to the specific job  
14 functions being performed. For example, employees who operate key pieces of equipment  
15 necessary to manage contact-handled (**CH**) or remote-handled (**RH**) TRU mixed waste (e.g.,  
16 forklifts, hoists, bridge cranes, cask transfer cars) must be trained to perform their duties in a  
17 way that ensures the WIPP facility is operated in compliance with the Permit. These employees  
18 receive on-the-job training and demonstrate the ability to operate the equipment, as appropriate,  
19 and must at a minimum be able to respond effectively to emergencies that might arise while  
20 performing their duties. Emergency response personnel receive training, commensurate with  
21 their duties, that ensures their familiarity with emergency procedures, emergency equipment,  
22 and emergency systems including, but not limited to:

- 23 • Procedures for using and inspecting facility emergency equipment:
- 24 • Communications and alarm systems; and
- 25 • Response to fires or explosions.

26 As there are no automatic waste feed systems at the WIPP facility, training on parameters for  
27 waste feed cut-off systems is not required. Similarly, as there is no potential for groundwater  
28 contamination incidents at the WIPP facility, training for responding to such incidents is not  
29 required.

30 F-2 Implementation of Facility Personnel Permit Training Program

31 The *WIPP Training Program* has been formulated to implement the requirements of this *Facility*  
32 *Personnel Permit Training Program*, thereby ensuring TRU mixed waste management and  
33 emergency response personnel employed at the facility receive the training necessary to  
34 comply with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264.16).

35 Newly hired employees, whose job positions are listed in Table F-2, receive the indicated  
36 training within six months of their date of hire or their transfer to a new position pursuant to  
37 20.4.1.500 NMAC (incorporating 40 CFR §264.16(b). Personnel do not work unsupervised in  
38 TRU mixed waste management or emergency response positions until they successfully  
39 complete the Permit-indicated training requirements. (~~Note that some emergency responder~~  
40 ~~certifications may take more than six months to complete.~~) TRU mixed waste management and  
41 emergency response personnel attend annual refresher courses that review the initial training  
42 received and document knowledge transfer. Per the *WIPP Training Program*, annual Permit

1 refresher training is to be completed within 30 calendar days of an employee's training  
2 anniversary date. If an employee's annual refresher training has lapsed, they do not work  
3 unsupervised in TRU mixed waste management or emergency response positions until they  
4 have successfully repeated the Permit-required initial training.

5 Records relating to the *Facility Personnel Permit Training Program* for TRU mixed waste  
6 management and emergency response personnel are maintained by WIPP Technical Training  
7 as personally identifiable information. These records are located at the WIPP facility and include  
8 a roster of employees in hazardous waste management positions; a list of courses required for  
9 each position; course descriptions; documentation when each employee has received and  
10 completed appropriate training. Training records of current personnel are kept by Technical  
11 Training until closure of the WIPP facility. Records of former employees are kept by Technical  
12 Training for at least three years from the date the employee last worked at the facility.

13 F-3 References

14 Nuclear Waste Partnership LLC, "WIPP Training Program," WP 14-TR.01, ~~Rev. 19-FRI, 2017~~

15 Nuclear Waste Partnership LLC, "WIPP Fire Department Training Plan," WP 12-FP.04, ~~Rev. 2,~~  
16 ~~2016~~

17 U.S. Department of Energy, "Training Program Handbook: A Systematic Approach to Training  
18 (DOE-HDBK-1078- 94)"

19 U.S. Department of Energy, "Alternative Systematic Approaches to Training (DOE-HDBK-1074  
20 95)"

## TABLES

**TABLE F-1  
 TRU MIXED WASTE MANAGEMENT AND EMERGENCY RESPONSE JOB TITLES AND  
 DESCRIPTIONS**

JOB TITLE	POSITION DESCRIPTION
TRU Mixed Waste Worker	<p>Responsible for or involved in the surface processing, transport, and underground emplacement of <del>contact-handled (CH)</del> and <del>remote-handled (RH)</del> <del>transuranic (TRU)</del> mixed waste. May come into contact with TRU mixed waste while carrying out job duties, actions or failure to act could result in a spill or release of TRU mixed waste at the WIPP facility, and job is important for operating the facility safely and in compliance with the hazardous waste regulations. Depending upon the TRU Mixed Waste Worker's specific job position, this may involve one or more of the following:</p> <ul style="list-style-type: none"> <li>• Operating waste handling equipment and support systems to unload, handle, and emplace TRU mixed waste into the repository</li> <li>• Performing spot decontamination of shipping casks, waste containers, and waste handling equipment</li> <li>• Performing waste container overpacking operations</li> <li>• Conducting routine inspections of incoming shipping containers for contamination and damage</li> <li>• Conducting routine contamination surveys during waste handling activities</li> <li>• Operating the Waste Shaft Hoist</li> <li>• Loading and unloading of the Waste Shaft Conveyance above and below ground</li> <li>• Managing and dispositioning of waste resulting from releases of TRU mixed waste or TRU mixed waste constituents</li> <li>• Cleaning and restoring emergency response equipment after a release of TRU mixed waste or TRU mixed waste constituents and prior to resumption of normal operations</li> </ul>
TRU Mixed Waste Worker Supervisor	<p>Supervisors of TRU Mixed Waste Workers are directly responsible for day-to-day operations related to TRU mixed waste. Depending upon the TRU Mixed Waste Worker Supervisor's specific job position, job duties may involve one or more of the following:</p> <ul style="list-style-type: none"> <li>• Overseeing TRU mixed waste management activities performed by TRU Mixed Waste Workers</li> <li>• Coordinating and directing the daily operation and maintenance of the Waste Shaft Hoist and Waste Shaft</li> </ul>
Emergency Responder	<p>Emergency responders provide expertise and support to the Incident Command. Depending upon the Emergency Responder's specific job position, job duties may involve one or more of the following:</p> <ul style="list-style-type: none"> <li>• Responding to fires, explosions, or emergencies involving releases of TRU mixed waste or TRU mixed waste constituents</li> <li>• Performing technical rescue operations</li> <li>• Performing emergency medical response</li> <li>• Operating emergency vehicles and equipment</li> <li>• Establishing conditions at the incident scene</li> <li>• Managing incident operations, personnel, and resources</li> <li>• Ensuring that fires, explosions, and releases of TRU mixed waste do not occur, recur, or spread to other hazardous waste at the facility by stopping processes and operations, collecting and containing released TRU mixed waste, and removing or isolating containers, as applicable</li> </ul>

JOB TITLE	POSITION DESCRIPTION
	<ul style="list-style-type: none"> <li>• Performing decontamination of contaminated personnel and providing oversight to emergency medical response personnel, if injured person is contaminated</li> <li>• Conducting contamination surveys, establishing hot lines/cold zones, and performing decontamination following a release of TRU mixed waste or TRU mixed waste constituents</li> <li>• Overpacking or plugging/patching of waste containers associated with release of TRU mixed waste or TRU mixed waste constituents</li> <li>• Performing containerization of released TRU mixed waste or TRU mixed waste constituents</li> <li>• Terminating field emergency response</li> </ul>
Emergency Coordinator	<p>In the event of a fire, explosion, release of TRU mixed waste or TRU mixed waste constituents that could threaten human health or the environment, the Emergency Coordinator is responsible for carrying out the implementation of the <i>RCRA Contingency Plan</i>. Emergency Coordinators ensure emergency responders have current and specific information to properly address the incident and minimize hazards to human health and the environment. Emergency Coordinators implement measures and procedures to ensure the safety of personnel, such as ensuring that alarms have been activated, personnel have been accounted for, and evacuation of personnel has occurred, if necessary. Upon implementation of the <i>RCRA Contingency Plan</i>, depending upon the Emergency Coordinator's specific job position, the job duties may involve one or more of the following:</p> <ul style="list-style-type: none"> <li>• Providing notification to emergency response personnel</li> <li>• Ensuring that alarms have been activated, personnel have been accounted for, any injuries have been attended to, and evacuation of personnel has occurred, if necessary</li> <li>• Restricting personnel not needed for response activities from the scene of the incident and curtailing nonessential activities in the area</li> <li>• Identifying released material and assessing the extent of the emergency</li> <li>• Assessing any hazards to human health or the environment associated with a fire, explosion, or release of TRU mixed waste or TRU mixed waste constituents</li> <li>• Notifying appropriate State and local agencies with designated response roles if their help is needed</li> <li>• Ensuring that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility by taking measures such as stopping processes and operations, collecting and containing released waste, and removing or isolating containers</li> <li>• Documenting the implementation of the <i>RCRA Contingency Plan</i></li> <li>• Ensuring immediate notification to the New Mexico Environment Department is provided for incidents requiring implementation of the <i>RCRA Contingency Plan</i></li> <li>• Making post-assessment notifications if it has been determined that the incident could threaten human health or the environment outside the facility</li> <li>• Providing for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility</li> <li>• Ensuring that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed</li> <li>• Ensuring that emergency equipment listed in the <i>RCRA Contingency Plan</i> is cleaned and fit for its intended use before operations are resumed</li> </ul>

JOB TITLE	POSITION DESCRIPTION
Inspector	<p>Responsible for routine inspection and maintenance (including repairing and replacement, as appropriate) of equipment instrumental in preventing, detecting, or responding to environmental or human health hazards, such as monitoring equipment, safety and emergency equipment, and operating or structural equipment. Inspections are performed at the facility to detect malfunctions, deterioration, operator errors, and discharges that may cause or lead to releases of TRU mixed waste or TRU mixed waste constituents to the environment or that could be a threat to human health. Depending on the Inspector's specific job position, job duties may involve one or more of the following:</p> <ul style="list-style-type: none"> <li>• Performing functional and operational checks of waste handling equipment and support systems as well as conducting waste container storage inspections</li> <li>• Conducting routine inspections of emergency response equipment and vehicles, on site</li> <li>• Performing routine inspections of the hoisting equipment for the Air Intake Shaft, Salt Handling Shaft, and Waste Shaft</li> <li>• Conducting routine inspections and testing of facility fire suppression and detection systems</li> <li>• Inspecting and testing of communication systems, site notification system, the public address system, and alarm systems for proper function</li> <li>• Performing routine inspections of the backup power supply diesel generators</li> <li>• Performing routine inspections of the eye wash and shower equipment</li> <li>• Performing routine inspections of the underground geomechanical instrumentation system</li> <li>• Performing routine inspections of the central uninterruptible power supply</li> <li>• Performing routine inspections of the fire water storage tank</li> <li>• Performing routine inspections of the ventilation exhaust fans</li> </ul>
RCRA Training Director	<p>Responsible for directing the hazardous waste management training at the WIPP facility. To meet the 20.4.1.500 NMAC (incorporating 40 CFR §264.16(a)(2)) requirements, the RCRA Training Director must be a person trained in hazardous waste management procedures.</p>



**Table F-2  
 PERMIT-REQUIRED TRAINING COURSES**

<b>Course</b>	<b>TRU Mixed Waste Worker</b>	<b>TRU Mixed Waste Worker Supervisor</b>	<b>Inspector</b>	<b>Emergency Responder</b>	<b>Emergency Coordinator</b>	<b>RCRA Training Director</b>
<b>General Employee Training</b> – WIPP facility employees must be escorted at the WIPP facility until this course has been completed. Course content contains information on RCRA, the Permit, the WIPP <i>RCRA Contingency Plan</i> , emergency preparedness, emergency response and evacuation procedures, fire protection, and safety signage. There is an annual refresher required for this course.	X	X	X	X	X	X
<b>RCRA Regulations/Hazardous Waste Facility Permit Overview</b> – This course includes an overview of 40 CFR Parts 260-282; <i>New Mexico Hazardous Waste Act</i> (Title 20 of the NMAC, Part 4.1); protocol for facility and waste handling equipment inspections; overview of communication systems; overview of security systems; overview of <i>RCRA Contingency Plan</i> ; overview of WIPP emergency equipment use, inspection, and repair; overview of training requirements; overview of Permit recordkeeping requirements; overview of NMED facility inspections; and consequences of Permit noncompliance. This course also provides an overview of the screening process (for procedures, facility configuration changes, training program changes, etc.) to ensure compliance with the Permit, along with an overview of the Permit modification process. There is an annual refresher required for this course.	X	X	X	X	X	X

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
<b>Hazardous Waste Worker</b> – This course addresses regulatory requirements for personnel who manage hazardous waste, including an in-depth review of the Hazard Communication Standard, principles of toxicology, hazard identification, and an overview of personal protective equipment for work activities associated with TRU mixed waste management. It also prepares emergency response personnel for hazardous waste handling, containment, and decontamination. There is an annual refresher required for this course.	X	X		X		X
<b>Hazardous Waste Responder</b> – Employees must complete Hazardous Waste Worker training before taking this course. Upon successful completion of the course and its prerequisites, a trainee will be able to respond to emergencies involving TRU mixed waste. Course curriculum includes an overview of the regulatory requirements, incident evaluation, overview of response operations, maintaining safety during an emergency response, and an overview of the Incident Command System at the WIPP facility. There is an annual refresher required for this course.				X		
<b>Hazardous Waste Worker Supervisor</b> – This course addresses manager and/or supervisor responsibilities for TRU mixed waste management. It addresses individual and corporate liability under applicable hazardous waste regulations. Course discusses impacts that decisions made during emergency situations may have, some with serious legal and safety consequences directly impacting the entities involved. There is an annual refresher required for this course.		X				

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
<p><b>Permit Inspections/Recordkeeping</b> – These technical work documents are under the purview of the responsible organization identified in Table E-1 of Permit Attachment E, <i>Inspection Schedule, Process and Forms</i>. This course addresses protocols for conducting Permit-specified inspections to detect malfunctions, deterioration, operator errors, and discharges; completion of inspection records; Permit-specified inspection frequencies; and corrective actions, including notifications and establishment of compensatory measures. This course also addresses review of the completed inspection record for completeness and accuracy; and the Permit-specified recordkeeping requirements. There is an annual refresher required for this course.</p>			X			
<p><b>RCRA Contingency Plan</b> – This course provides an in-depth review of the WIPP <i>RCRA Contingency Plan</i> addressing when the Plan is to be implemented, appropriate emergency response actions, required notifications, evacuation plan details, and post-emergency RCRA-required activities. This course also addresses where copies of the Plan are required to be located and when the Plan must be amended. There is an annual refresher required for this course.</p>					X	

**ATTACHMENT G**  
**CLOSURE PLAN**

**ATTACHMENT G**

**CLOSURE PLAN**

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## ATTACHMENT G

### CLOSURE PLAN

#### Introduction

This Permit Attachment contains the Closure Plan that describes the activities necessary to close the Waste Isolation Pilot Plant (WIPP) individual units and facility. Since the current plans for operations extend over several decades, the Permittees will periodically reapply for an operating permit in accordance with 20.4.1.900 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal Regulations (CFR) §270.10(h)). Consequently, this Closure Plan describes several types of closures. The first type is panel closure, which involves constructing closures ~~for~~ each of the underground hazardous waste disposal units (HWDUs) after they are filled. The second type is partial closure, which can be less than the entire facility and, therefore, less than an entire unit as described herein for the Waste Handling Building (WHB) Container Storage Unit (WHB Unit), the Parking Area Container Storage Unit (PAU), or Permit-related surface equipment, structures and contaminated soils. The third type of closure is final facility closure at the end of the Disposal Phase, which will entail “clean” closure of ~~all~~ remaining surface storage units and construction of shaft seal systems for each shaft. Finally, in the event a new permit is not issued prior to expiration of an existing permit, a modification to this Closure Plan will be sought to perform contingency closure. Contingency closure defers the final closure of waste management facilities such as the Waste Handling Building Container Storage Unit (WHB Unit), the conveyances, the shafts, and the haulage ways because these will be needed to continue operations with non-mixed Transuranic (TRU) waste.

The hazardous waste management units (HWMUs) addressed in this Closure Plan include the ~~aboveground HWMU in the WHB Unit~~, the ~~PAU parking area HWMU~~, and Panels 1 through 8, Panel 11, and Panel 12, each consisting of seven rooms. In addition, this Closure Plan includes closures for Panels 9 and 10.

This plan was submitted to the New Mexico Environment Department (NMED) in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(13)). Closure at the panel level will include the construction of barriers that will contribute to limiting the emission of hazardous waste constituents from the panel into the mine ventilation air stream below levels that meet environmental performance standards. The Post-Closure Plan (Permit Attachment H) includes the implementation of institutional controls to limit access and groundwater monitoring to assess disposal system performance. Until final closure is complete and has been certified in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.115), a copy of the approved Closure Plan and ~~all~~ approved revisions will be on file at the WIPP facility and will be available to the Secretary of the NMED in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.112(a)(2)) or the U.S. Environmental Protection Agency (EPA) Region VI Administrator upon request.

This Closure Plan uses the terms Disposal Phase, facility closure period, and post-closure care period. The Disposal Phase began with the first waste emplacement in March 1999 and extends until the expiration of the Permit term or when the HWDUs have received the final volume of waste as specified in Permit Part 4, Table 4.1.1-facility reaches its maximum capacity as defined in Section G-1c. The facility closure period is the 10-year period that begins once the final waste

1 has been emplaced in the underground. The post-closure care period extends for 30-years after  
2 completion of facility closure period.

### 3 G-1 Closure Plan

4 This Closure Plan is prepared in accordance with the requirements of 20.4.1.500 NMAC  
5 (incorporating 40 CFR Part §264, Subparts G, I, and X), Closure and Post-Closure, Use and  
6 Management of Containers, and Miscellaneous Units. The WIPP underground HWDUs, shown  
7 on Figure M-43G-1, will be closed under this Closure Plan to meet the performance standards in  
8 20.4.1.500 NMAC (incorporating 40 CFR §264.601). The WIPP surface facilities, including the  
9 WHB Waste Handling Building Container Storage Unit and the PAU Parking Area Container  
10 Storage Unit, will be closed in accordance with 20.4.1.500 NMAC (incorporating 40 CFR  
11 §264.178). The Permittees may perform partial closure of the WHB Unit, PAU HWMUs, or  
12 Permit-related surface equipment, structures and contaminated soils prior to final facility closure  
13 and certification. For final facility closure, this plan also includes closure and sealing of the  
14 facility shafts in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.601).

15 Following completion of waste emplacement in each underground HWDU, the HWDU will be  
16 closed. The Permittees will notify the NMED of the closure of each underground HWDU as  
17 specified in the schedule in Figure M-61G-2. For the purpose of this Closure Plan, panel closure  
18 is defined as the process of rendering underground HWDUs in the repository inactive and  
19 closed according to the facility Closure Plan. The Post-Closure Plan (Permit Attachment H)  
20 addresses requirements for future monitoring that are deemed necessary for the post-closure  
21 period, prior to final facility closure.

22 For the purposes of this Closure Plan, final facility closure is defined as closure that will occur  
23 when ~~all~~ permitted HWDUs are filled or have achieved their maximum capacities as outlined in  
24 Permit Part 4, Table 4.1.1, or when the WIPP facility achieves its capacity of 6.2 million cubic  
25 feet (ft<sup>3</sup>) (175,564 cubic meters (m<sup>3</sup>)) of Land Withdrawal Act (LWA) TRU waste volume. At final  
26 facility closure, the surface container storage areas will be closed, ~~and equipment that can be~~  
27 ~~decontaminated and used at other facilities will be cleaned and sent off site~~. Equipment that  
28 cannot be decontaminated plus any derived waste resulting from decontamination will be placed  
29 in the last open underground HWDU. In addition, shafts and boreholes which lie within the  
30 WIPP Site Boundary and penetrate the Salado Formation (**Salado**) will be plugged and sealed,  
31 and surface and subsurface facilities and equipment will be decontaminated, if necessary, and  
32 removed and dispositioned appropriately or, alternatively, disposed in the last open  
33 underground HWDU as derived waste. The requirements in Permit Part 2, Section 2.3.3.4,  
34 Chemical Incompatibility, apply to surface and subsurface facilities and equipment to be  
35 disposed upon final facility closure. Final facility closure will be completed to demonstrate  
36 compliance with the Closure Performance Standards contained in 20.4.1.500 NMAC  
37 (incorporating 40 CFR §264.111, 178, and 601).

38 In the event the Permittees fail to obtain an extension of the hazardous waste permit in  
39 accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.51) or fail to obtain a new  
40 permit in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.10(h)), the Permittees  
41 will seek a modification to this Closure Plan in accordance with 20.4.1.900 NMAC (incorporating  
42 40 CFR §270.42) to accommodate a contingency closure. Under contingency closure, storage  
43 units will undergo clean closure in accordance with 20.4.1.500 NMAC (incorporating 40 CFR  
44 §264.178); waste handling equipment, shafts, and haulage ways will be inspected for hazardous



1 waste residues (using, among other techniques, radiological surveys to indicate potential  
2 hazardous waste releases as described in Permit Attachment G3) and decontaminated as  
3 necessary; and underground HWDUs that contain radioactive mixed waste will be closed in  
4 accordance with the panel closure design described in this Closure Plan. Final facility closure,  
5 however, will be redefined and a time extension for final closure will be requested. A copy of this  
6 Closure Plan will be maintained by the Permittees at the WIPP facility and at the U.S.  
7 Department of Energy (DOE) Carlsbad Field Office. The primary contact person at the WIPP  
8 facility is:

9           Manager, Carlsbad Field Office  
10           U.S. Department of Energy  
11           Waste Isolation Pilot Plant  
12           P. O. Box 3090  
13           Carlsbad, New Mexico 88221-3090  
14           (575) 234-7300

15 G-1a        Closure Performance Standard

16 The closure performance standard specified in 20.4.1.500 NMAC (incorporating 40 CFR  
17 §264.111), states that the closure shall be performed in a manner that minimizes the need for  
18 further maintenance; that minimizes, controls, or eliminates the escape of hazardous waste; and  
19 that conforms to the closure requirements of §264.178 and §264.601. These standards are  
20 discussed in the following paragraphs.

21 G-1a(1)     Container Storage Units

22 Final or partial closure of the permitted container storage units (the ~~WHB~~Waste Handling  
23 Building Unit and ~~PAU~~Parking Area Unit) will be accomplished by removing ~~all~~ waste and waste  
24 residues. Indication of waste contamination will be based, among other techniques, on the use  
25 of radiological surveys as described in Permit Attachment G3. Radiological surveys use very  
26 sensitive radiation detection equipment to indicate if there has been a potential release of TRU  
27 mixed waste, including hazardous waste components, from a container. This allows the  
28 Permittees to indicate potential releases that are not detectable from visible evidence such as  
29 stains or discoloration. Visual inspection and operating records will also be used to identify  
30 areas where decontamination is necessary. Contaminated surfaces will be decontaminated until  
31 radioactivity is below DOE-established radiological protection limits<sup>1</sup>. Once surfaces are  
32 determined to be free of radioactive waste constituents, they will be sampled for hazardous  
33 waste contamination. Hazardous waste decontamination, if needed, will be conducted in  
34 accordance with the requirements of the Permit and the standards in 20.4.1.500 NMAC  
35 (incorporating 40 CFR Part 264). These surface decontamination activities will ensure the  
36 removal of waste residues to levels protective of human health and the environment. ~~The facility~~  
37 ~~is expected to require no decontamination at closure because any waste spilled or released~~  
38 ~~during operations will be contained and removed immediately.~~ Solid waste management units  
39 listed in Attachment K, Table K-4 will be subject to closure.

40 Once the container storage units are ~~decontaminated and~~ certified by the Permittees to be  
41 clean, no further maintenance is required. The facilities and equipment in these units will be

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<sup>1</sup> Title 10 CFR Part 835.

1 ~~available~~ reused for other purposes ~~as needed~~. If portions of the facilities or equipment in these  
2 units, which require decontamination, cannot be decontaminated, these portions will be  
3 removed, and the resultant wastes will be managed consistent with radiological control  
4 procedures pursuant to 10 CFR Part 835.

5 G-1a(2) Miscellaneous Unit

6 Post-closure migration of hazardous waste or hazardous waste constituents to ground or  
7 surface waters or to the atmosphere, above levels that will harm human health or the  
8 environment, will not occur due to facility engineering and the geological isolation of the unit.  
9 The engineering aspects of closure are centered on the use of panel closures on each of the  
10 underground HWDUs and final facility seals placed in the shafts. The design of the panel  
11 closure system is based on the criteria that the closure system for closed underground HWDUs  
12 will prevent migration of hazardous waste constituents in the air pathway in concentrations  
13 above health-based levels beyond the WIPP land withdrawal boundary during the Disposal  
14 Phase~~35-year operational~~ and facility closure period.

15 Consistent with the definitions in 20.4.1.101 NMAC (incorporating 40 CFR §260.10), the  
16 process of panel closure is considered partial closure because it is a process of rendering a part  
17 of the repository inactive and closed according to the approved underground HWDU partial  
18 closure plan. Panel closure will be complete when the panel closure system is emplaced and  
19 operational, ~~when that underground HWDU and related equipment and structures have been~~  
20 ~~decontaminated (if necessary)~~, and when the NMED has been notified of the closure.

21 Shaft seals are designed to provide effective barriers to the inward migration of ground-water  
22 and the outward migration of gas and contaminated brine over two discrete time periods.  
23 Several components become effective immediately and are expected to function for 100 years.  
24 Other components become effective more slowly, but provide permanent isolation of the waste.  
25 The final shaft seal design is specified in Permit Attachment G2.

26 The facility will be finally closed to minimize the need for continued maintenance. Protection of  
27 human health and the environment includes, but is not limited to:

- 28 • Prevention of any releases that may have adverse effects on human health or the  
29 environment due to the migration of waste constituents in the groundwater or in the  
30 subsurface environment [20.4.1.500 NMAC, incorporating 40 CFR §264.601(a)].
- 31 • Prevention of any releases that may have adverse effects on human health or  
32 environment due to migration of waste constituents in surface water, in wetlands, or on  
33 the soil surface [20.4.1.500 NMAC, incorporating 40 CFR §264.601(b)].
- 34 • Prevention of any release that may have adverse effects on human health or the  
35 environment due to migration of waste constituents in the air [20.4.1.500 NMAC,  
36 incorporating 40 CFR §264.601(c)].

37 As part of final facility closure, surface recontouring and reclamation will establish a stable  
38 vegetative cover, and further surface maintenance will not be necessary to protect human  
39 health and the environment. Prior to cessation of active controls, monuments will be emplaced  
40 to serve as long-term site markers to discourage activities that would penetrate the facility or  
41 impair the ability of the salt formation to isolate the waste from the surface environment for at

1 least 10,000 years. The Federal government will maintain administrative responsibility for the  
2 repository site in perpetuity and will limit future use of the area.

3 If, during panel or final facility closure activities, unexpected events require modification of this  
4 Closure Plan to demonstrate compliance with closure performance standards, a Closure Plan  
5 amendment will be submitted in accordance with 20.4.1.900 NMAC (incorporating 40 CFR  
6 §270.42).

### 7 G-1a(3) Post-Closure Care

8 The post-closure care period will begin after completion of the first panel closure and will  
9 continue for 30 years after final facility closure. The post-closure care period may be shortened  
10 or lengthened at the discretion of the ~~NMED regulatory agency~~ based on evidence that human  
11 health and the environment are being protected or that they are at risk. During the post-closure  
12 care period, the WIPP facility shall be maintained in a manner that complies with the  
13 environmental performance standards in 20.4.1.500 NMAC (incorporating 40 CFR §264.601).  
14 Post-closure activities are described in Permit Attachment H.

### 15 G-1b Requirements

16 The Permit specifies a sequential process for the closure of individual HWMUs at the WIPP  
17 facility. Each underground HWDU will undergo panel closure when waste emplacement in that  
18 HWDU panel is complete. Following waste emplacement in each underground HWDU,  
19 construction-side ventilation will be terminated, ~~and~~ waste-disposal-side ventilation will be  
20 established in the next underground HWDU to be used, and the underground HWDU containing  
21 the waste will be closed. The Permittees will notify the NMED of the closure of each of the  
22 underground HWDUs as they are sequentially filled on a HWDU-by-HWDU basis. The HWMUs  
23 in the WHB and in the parking area will be closed as part of final facility closure of the WIPP  
24 facility.

25 The Permittees will notify the Secretary of the NMED in writing at least 60 days prior to the date  
26 on which closure activities are scheduled to begin.

### 27 G-1c Maximum Waste Inventory

28 The maximum waste inventory (maximum capacity) for the permitted HWDUs is established in  
29 Permit Part 4, Table 4.1.1. ~~During the Disposal Phase, and in~~ accordance with the LWA, the  
30 WIPP facility will receive no more than 6.2 million ft<sup>3</sup> (175,564 m<sup>3</sup>) of LWA TRU waste volume,  
31 which may include up to 250,000 ft<sup>3</sup> (7,079 m<sup>3</sup>) of remote-handled (RH) TRU ~~mixed~~ waste.  
32 Excavations are mined as permitted when needed during operations to maintain a reserve of  
33 disposal areas. The amount of waste placed in each room is limited by structural and physical  
34 considerations of equipment and design. Transuranic mixed waste volumes include waste  
35 received from off-site generator locations as well as derived waste from disposal and  
36 decontamination operations. For closure planning purposes, a maximum achievable volume of  
37 685,100 ft<sup>3</sup> (19,400 m<sup>3</sup>) of TRU mixed waste per panel HWDU is used listed in Permit Part 4,  
38 Table 4.1.1. This equates to 662,150 ft<sup>3</sup> (18,750 m<sup>3</sup>) of contact handled (CH) TRU mixed waste  
39 and 22,950 ft<sup>3</sup> (650 m<sup>3</sup>) of RH TRU mixed waste per panel.

40 The maximum extent of operations during the term of this permit ~~is expected to be~~ includes  
41 Panels 1 through 4-8, and Panels 10- through 12; as shown on Figure G-1, the WHB Container

1 ~~Storage Unit~~, and the ~~PAU Parking Area Container Storage Unit~~. Note that ~~panels Panel 9 will~~  
2 ~~not be used for TRU mixed waste disposal~~ and ~~Panel 10 is~~are not authorized for waste  
3 emplacement under this permit. If other waste management units are permitted during the  
4 Disposal Phase, this Closure Plan will be revised to include the additional waste management  
5 units. ~~The design basis for a panel assumes that it takes about 30 months to fill the HWDU and~~  
6 ~~initiate panel closure (DOE, 1997). However, it is anticipated that Panel 7, Panel 8, and Panel~~  
7 ~~10 (if authorized in the future for TRU mixed waste disposal) will take longer than 30 months to~~  
8 ~~fill due to the reduction in available ventilation capability, ground conditions in Panel 10 and~~  
9 ~~associated remediation efforts, and radiological contamination in Panel 10. These assumptions~~  
10 ~~have been used in preparing the closure schedule in Table G-1. At any given time during~~  
11 disposal operations, it is possible that multiple rooms may be receiving TRU mixed waste for  
12 disposal at the same time. Underground HWDUs in which disposal has been completed (i.e., in  
13 which CH and RH TRU mixed waste emplacement activities have ceased) will undergo panel  
14 closure.

#### 15 G-1d Schedule for Closure

16 For the purpose of establishing a schedule for closure, ~~the final waste disposal will mark the end~~  
17 ~~of the Disposal Phase and will occur when the Permit term expires or the permitted HWDUs are~~  
18 ~~filled or have achieved their maximum capacities as outlined in Permit Part 4, Table 4.1.1, or~~  
19 ~~when the WIPP facility achieves its within the capacity limit of 6.2 million cubic feet (ft<sup>3</sup>) (175,564~~  
20 ~~cubic meters (m<sup>3</sup>)) of LWA TRU waste volume. The Permittees also assume closure will take 10~~  
21 ~~years an operating and closure period of no more than 35 years (25 years for disposal~~  
22 ~~operations and 10 years for closure) is assumed. This operating period The Disposal Phase~~  
23 may be extended or shortened, ~~within the authorized capacities and Permit term~~, depending on  
24 a number of factors, including the rate of waste approved for shipment to the WIPP facility and  
25 the schedules of TRU mixed waste generator sites, and future decommissioning activities.

#### 26 G-1d(1) Schedule for Panel Closure

27 The anticipated schedule for the closure of the underground HWDUs is shown in Figure ~~M-61G-~~  
28 ~~2~~. Underground HWDUs should be ready for closure according to the schedule in Table G-1.  
29 ~~Table G-1 shows actual dates for completed activities and future dates based on the facility~~  
30 ~~design parameters discussed in Section G-1c. These future Future~~ dates are estimates for  
31 planning and permitting purposes. Actual dates may vary depending on the availability of waste  
32 from the generator sites.

33 In the schedule in Figure ~~M-61G-2~~, notification of intent to close occurs 30 days before placing  
34 the final waste in an ~~HWDU panel~~. Once an ~~HWDU panel~~ is full, the Permittees will initially block  
35 ventilation through the ~~HWDU panel~~ as described in Permit Attachment A2, Section A2-2a(3)  
36 "Subsurface Structures," and then will assess the closure area for ground conditions and  
37 contamination so that a definitive schedule and closure location can be determined. If as the  
38 result of this assessment the Permittees determine that a panel closure cannot be emplaced in  
39 accordance with the schedule in this Closure Plan, a modification will be submitted requesting  
40 an extension to the time for closure.

#### 41 G-1d(2) Schedule for Final Facility Closure

42 ~~The Disposal Phase for the WIPP facility is expected to require a period of 25 years beginning~~  
43 ~~with the first receipt of TRU waste at the WIPP facility and followed by a period ranging from 7~~

1 ~~to 10 years for decontamination, decommissioning, and final closure. The Disposal Phase may~~  
2 ~~therefore extend until 2024, and the latest expected year of final closure of the WIPP facility~~  
3 ~~(i.e., date of final closure certification) would be 2034.~~ If, as is currently projected, the WIPP  
4 facility is dismantled at closure, ~~all~~ ~~surface and subsurface~~ facilities (except the hot cell portion  
5 of the WHB, which will remain as an artifact of the Permanent Marker System [PMS]) will be  
6 disassembled and either salvaged or disposed in accordance with applicable standards.  
7 Subsurface facilities and equipment will be disassembled and disposed or salvaged to the  
8 extent practicable based on underground mining practice. In addition, asphalt and crushed  
9 caliche that was used for paving will be removed, and the area will be recontoured and  
10 revegetated in accordance with a land management plan. A detailed closure schedule will be  
11 submitted in writing to the Secretary of the NMED, along with the notification of closure.  
12 Throughout the closure period, ~~all~~ necessary steps will be taken to prevent threats to human  
13 health and the environment in compliance with ~~all~~ applicable Resource Conservation and  
14 Recovery Act (RCRA) permit requirements. Figure M-62G-3 presents an estimate of a final  
15 facility closure schedule ~~based on 84 months to implement final closure.~~

16 The schedule for final facility closure is considered to be a best estimate because closure of the  
17 facility is driven by policies and practices established for the decontamination, if necessary, and  
18 decommissioning of radioactively contaminated facilities. These required activities include  
19 extensive radiological contamination surveys and hazardous constituent surveys using, among  
20 other techniques, radiological surveys to indicate potential hazardous waste releases. Both  
21 types of surveys will be performed at ~~the all~~ areas of the WIPP site where hazardous waste  
22 were managed, as appropriate. These surveys, along with historical radiological survey records,  
23 will provide the basis for determining the disposition ~~release~~ of structures, equipment, and  
24 components ~~for~~ (i.e., disposal or decontamination for release off-site). Specifications will be  
25 developed for each structure to be removed. A cost benefit analysis may ~~will~~ be needed to  
26 evaluate decontamination options if extensive decontamination is necessary. Individual  
27 equipment surveys, structure surveys, and debris surveys may ~~will~~ be required prior to  
28 disposition. Size-reduction techniques may be required to dispose of mixed or radioactive waste  
29 at the WIPP site. Current DOE policy requires the preparation of a final  
30 decontamination ~~decommissioning~~ and decommissioning ~~decontamination~~ (D&D) plan  
31 immediately prior to final facility closure. In this way, the specific conditions of the facility at the  
32 time D&D is initiated will be addressed. Section G-1e(23) provides a more detailed discussion of  
33 final facility closure activities.

34 Figure M-62G-3 shows the schedule for the final facility closure consisting of decontamination,  
35 as needed, of the TRU waste-handling equipment, and of the aboveground equipment and  
36 facilities, including closure of surface HWMUs; decontamination of the shaft and haulage ways  
37 (if needed); disposal of decontamination derived wastes in the last open underground HWDU;  
38 and subsequent closure of this underground HWDU. Subsequent activities will include  
39 installation of repository shaft seals.

40 ~~An overall~~ A schedule for final facility closure, showing anticipated durations for ~~currently~~  
41 ~~scheduled dates for the start and end of~~ final facility closure activities, is shown in Table G-2.  
42 This schedule is based on notification of the intent to close as the initial activity, 60 days prior to  
43 the final facility closure start date. The dates assume a startup date of March 1999 and  
44 continued permitting of the WIPP facility until it is filled. Schedule details for panel closures are  
45 shown on Table G-1.



1 G-1d(3) Extension for Closure Time

2 As indicated by the closure schedule presented in Figure M-62G-3, the activities necessary to  
3 perform facility closure of the WIPP facility may require more than 180 days to complete  
4 because of additional stringent requirements for managing radioactive materials. Therefore, the  
5 Permit provides an extension of the 180-day final closure requirement in accordance with  
6 20.4.1.500 NMAC (incorporating 40 CFR §264.113). During the extended closure period, the  
7 Permittees will continue to demonstrate compliance with applicable permit requirements and will  
8 take ~~the all~~ steps necessary to prevent threats to human health and the environment as a result  
9 of TRU mixed waste management at the WIPP facility including all of the applicable measures  
10 in Permit Part 2.10  ~~(Preparedness and Prevention)~~.

11 In addition, according to the schedules in Figure M-62G-3, the final derived wastes that are  
12 generated as the result of decontamination activities will not be disposed of for 16 months after  
13 the initiation of final facility closure. In accordance with 20.4.1.500 NMAC (incorporating 40 CFR  
14 §264.113(a)), the Permit provides an extension of the 90-day limit to dispose of final derived  
15 waste resulting from the closure process. This provision is necessitated by the fact that the  
16 radioactive nature of the derived waste makes placement in the WIPP repository the best  
17 disposition, and the removal of these wastes will, by necessity, take longer than 90 days in  
18 accordance with the closure schedules. During this extended period of time, the Permittees will  
19 take ~~the all~~ steps necessary to prevent threats to human health and the environment, including  
20 compliance with ~~all~~ applicable permit requirements. These steps include ~~all of~~ the applicable  
21 preparedness and prevention measures in Permit Part 2, Section 2.10  ~~(Preparedness and~~  
22 ~~Prevention)~~.

23 Finally, in the event the hazardous waste permit is not renewed as assumed in the schedule,  
24 the Permittees will submit a modification to the Closure Plan to implement a contingency closure  
25 that will allow the Permittees to continue to operate for the disposal of non-mixed TRU waste.  
26 This modification will include a request for an extension of the time for final facility closure. This  
27 modified Closure Plan will be submitted to the NMED for approval.

28 G-1d(4) Amendment of the Closure Plan

29 If it becomes necessary to amend the Closure Plan for the WIPP facility, the Permittees will  
30 submit, ~~in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.42)~~, a written  
31 notification of or request for a permit modification in accordance with 20.4.1.900 NMAC  
32 (incorporating 40 CFR §270.42). ~~This notification of, or request for, a permit modification will~~  
33 ~~describedescribing~~ any change in operation or facility design that affects the Closure Plan. The  
34 written notification ~~of,~~ or request for, a permit modification will include a copy of the amended  
35 Closure Plan for approval by the NMED. The Permittees will submit a written notification of ~~,~~ or  
36 request for ~~,~~ a permit modification to authorize a change in the approved plan, if:

- 37 • There are changes in operating plans or in the waste management unit facility design  
38 that affect the Closure Plan
- 39 • There is a change in the expected year of closure
- 40 • Unexpected events occur during panel or final facility closure that require modification of  
41 the approved Closure Plan

- 1 • Changes in State or Federal laws affect the Closure Plan
- 2 • Permittees fail to obtain permits for continued operations as discussed above

3 The Permittees will submit a written request for a permit modification with a copy of the  
4 amended Closure Plan at least 60 days prior to the proposed change in facility design or  
5 operation or within 60 days of the occurrence of an unexpected event that affects the Closure  
6 Plan. If the unexpected event occurs during final closure, the permit modification will be  
7 requested within 30 days of the occurrence. If the Secretary of the NMED requests a  
8 modification of the Closure Plan, a plan modified in accordance with the request will be  
9 submitted within 60 days of notification or within 30 days, if the change in facility condition  
10 occurs during final closure.

### 11 G-1e Closure Activities

12 Closure activities include those instituted for panel closure (i.e., closure of filled underground  
13 HWDUs), contingency closure (i.e., closure of surface HWMUs and decontamination of other  
14 waste handling areas), and final facility closure (i.e., closure of surface HWMUs, D&D of surface  
15 facilities and the areas surrounding the WHB, and placement of repository shaft seals). Panel  
16 closure systems will be emplaced to separate areas of the facility and to isolate panels. Permit  
17 Attachments G1 and G2 provide panel closure system and shaft seal designs, respectively.  
18 ~~Closure~~All closure activities will meet the applicable quality assurance (QA)/quality control (QC)  
19 program standards in place at the WIPP facility. Facility monitoring procedures in place during  
20 operations will remain in place through final closure, as applicable.

### 21 G-1e(1) Panel Closure

22 Following completion of waste emplacement in each underground HWDU, the HWDU will be  
23 closed. A WIPP Panel Closure (**WPC**) will be emplaced in the panel access drifts, in accordance  
24 with the design in Permit Attachment G1 and the schedule in Figure ~~M-61G-2~~ and Table G-1.  
25 Alternatively, panels may be closed simultaneously by placing panel closures in the north-south  
26 mains (E-300, E-140, W-30, and W-170), as shown in Figure ~~M-43G-1~~. ~~If this alternative is used~~  
27 ~~to close Panels 3, 4, 5, and 6, then Panel 9 will not be used for TRU mixed waste disposal.~~ The  
28 panel closure system is designed to meet the following requirements that were established by  
29 the DOE for the design to comply with 20.4.1.500 NMAC (incorporating 40 CFR §264.601(a)):

- 30 • the panel closure system shall contribute to meeting the closure performance standards  
31 in Permit Part 6, Section 6.10.1 by mitigating the migration of volatile organic  
32 compounds (**VOCs**) from closed panels
- 33 • the panel closure system shall consider potential flow of VOCs through the disturbed  
34 rock zone (**DRZ**) in addition to flow through closure components
- 35 • the panel closure system shall perform its intended functions under loads generated by  
36 creep closure of the tunnels
- 37 • the panel closure system shall perform its intended function under the conditions of a  
38 postulated thermal runaway involving nitrate salt bearing waste (Golder, 2016)

- 1 • the nominal operational life of the closure system is 35 years, however, the inspection  
2 and maintenance, if needed, of accessible bulkheads can continue until the initiation of  
3 final facility closure
- 4 • the panel closure system may require minimal maintenance per 20.4.1.500 NMAC  
5 (incorporating 40 CFR 264.111)
- 6 • the panel closure system shall address the expected ground conditions in the waste  
7 disposal area
- 8 • the panel closure system shall be built of substantial construction and non-combustible  
9 material except for flexible flashing used to accommodate salt movement
- 10 • the design and construction shall follow conventional mining practices
- 11 • structural analysis shall use data acquired from the WIPP underground
- 12 • materials shall be compatible with their emplacement environment and function
- 13 • treatment of surfaces in the closure areas shall be considered in the design
- 14 • a QA/QC program shall verify material properties and construction
- 15 • construction of the panel closure system shall consider shaft and underground access  
16 and services for materials handling

17 The closure performance standard for air emissions from the WIPP facility is one excess cancer  
18 death in one million and a hazard index (HI) of 1 for a member of the public living outside the  
19 WIPP Site Boundary as specified in Permit Part 6, Section 6.10.1. Releases shall be below  
20 these limits for the facility to remain in compliance with standards to protect human health and  
21 the environment. The panel closure design has been shown, through analysis, to meet these  
22 standards, if emplaced in accordance with the specifications in Permit Attachment G1.  
23 Compliance will be demonstrated by the Repository VOC Monitoring Program (RVMP) in Permit  
24 Attachment N. Compliance with the standards established for the RVMP constitutes compliance  
25 with the closure standards in Permit Part 6, Table 6.10.1.

26 The design basis for this closure is such that the migration of hazardous waste constituents  
27 from closed panels during the operational and closure period would result in concentrations well  
28 below health-based standards. The source term used as the design basis included the average  
29 concentrations of VOCs from CH waste containers as measured in headspace gases through  
30 November 2010. The VOCs are assumed to have been released by diffusion through the  
31 container vents and are removed from the closed room by air leakage that occurs due to  
32 ventilation-related pressure differentials.

33 ~~Figures G-4, G-4a, and G-5 show diagrams~~Diagrams of the panel closure design, the  
34 substantial barrier, and installation envelopes are depicted in Permit Attachment G1, Appendix  
35 G1-B, and Attachment M, Figure M-63, and Figure M-42. Permit Attachment G1 provides the  
36 detailed design and the design analysis for the panel closure system. The Permittees shall use  
37 bulkheads as specified in Attachment G1 for the closure of filled panels. A run-of-mine (ROM)



1 salt component, ~~placed between two bulkheads, was will be~~ included in the closure for Panel 9  
2 and ~~will be included in the closure for~~ Panel 10. The substantial barrier in Figure ~~M-63G-4a~~ will  
3 be installed in Panels 7 and 8.

4 ~~G-1e(2) Prerequisite Activities for Panel 6 Final Closure~~

5 ~~The NMED-approved WIPP Nitrate Salt Bearing Waste Container Isolation Plan (DOE, 2015)~~  
6 ~~provides for performing prerequisite activities associated with ground control, equipment~~  
7 ~~readiness, work control authorization, and ventilation prior to construction of the final closure in~~  
8 ~~Panel 6. These activities are considered closure activities and will be completed in accordance~~  
9 ~~with the WIPP Nitrate Salt Bearing Waste Container Isolation Plan (DOE, 2015).~~

10 ~~G-1e(23) Decontamination and Decommissioning~~

11 Decontamination is defined as those activities which are performed to remove contamination  
12 from surfaces and equipment that are not intended to be disposed of at the WIPP facility. The  
13 policy at the WIPP facility will be to decontaminate as many areas as possible or to fix the  
14 contaminants to the surface so they are not easily removable, consistent with radiological  
15 protection policy. Decontamination or fixing are part of closure activities and are a necessary  
16 activity in the clean closure of the surface container management units. Decontamination or  
17 fixing determinations are based upon radiological surveys.

18 Decommissioning is the process of removing equipment, facilities, or surface areas from further  
19 use and closing the facility. Decommissioning is part of final facility closure only and will involve  
20 the removal of equipment, buildings, closure of the shafts, and establishing active and passive  
21 institutional controls for the facility. Passive institutional controls are not included in the Permit.

22 The objective of D&D activities at the WIPP facility is to return the surface to as close to the  
23 preconstruction condition as reasonably possible, while protecting the health and safety of the  
24 public and the environment. Major activities required to accomplish this objective include, but  
25 are not limited to the following:

- 26 1. Review of operational records for historical information on releases
- 27 2. Visual examination of surface structures for evidence of spills or releases
- 28 3. Performance of site contamination surveys
- 29 4. Decontamination, if necessary, of usable equipment, materials, and structures including  
30 surface facilities and areas surrounding the WHB.
- 31 5. Disposal of equipment/materials that cannot be decontaminated but that meet the  
32 treatment, storage, and disposal facility waste acceptance criteria (**TSDF-WAC**) in an  
33 underground HWDU
- 34 6. Placement of panel closure system in the last HWDU

- 1 7. Emplacement of shaft seals<sup>2</sup>
- 2 8. Regrading the surface to approximately original contours
- 3 9. Initiation of active controls

4 This Closure Plan will be amended prior to the initiation of final closure activities to specify the  
5 methods to be used.

6 G-1e(2)(a) Hazards Survey~~Health and Safety~~

7 Before final closure activities begin, radiation protection personnel will conduct a hazards survey  
8 of the unit(s) being closed. A release of radionuclides could also indicate a release of hazardous  
9 constituents. If radionuclides are not detected, sampling for hazardous constituents will still be  
10 performed if there is documentation or visible evidence that a spill or release has occurred. The  
11 purpose of the hazards survey will be to identify potential contamination concerns that may  
12 present hazards to workers during the closure activities and to specify any control measures  
13 necessary to reduce worker risk. This survey will provide the information necessary for the  
14 health physics personnel to identify worker qualifications, personal protective equipment (PPE),  
15 safety awareness, work permits, exposure control programs, and emergency coordination that  
16 will be required to perform closure related activities.

17 G-1e(23)(ba) Determine the Extent of Contamination

18 The first activities performed as part of decontamination include those needed to determine the  
19 extent of any contamination that needs to be removed or fixed prior to decommissioning a  
20 facility. This includes activities 1 to 3 above and, as can be seen by the schedules in Figures ~~M-~~  
21 ~~61G-2~~ and ~~M-62G-3~~ (Items B and C), these surveys are anticipated to take 10 months to  
22 perform, including obtaining the results of any sample analyses. The process of identifying  
23 areas that require decontamination or fixing include three sources of information. First,  
24 operating records will be reviewed to determine where contamination has previously been found  
25 as the result of historical releases and spills. Even though releases and spills in the above  
26 ground storage units will have been cleaned up at the time of occurrence, newer equipment and  
27 technology may allow further cleaning. Second, surfaces of facilities and structures will be  
28 examined visually for evidence of spills or releases. Finally, extensive detailed contamination  
29 surveys will be performed to document the level of cleanliness for surface structures and  
30 equipment that are subject to decontamination. If equipment or areas are identified as  
31 contaminated, the Permittees will notify NMED as specified in Permit Part 1, and a plan and  
32 procedure(s) will be developed and implemented to address decontamination-related questions,  
33 including:

- 34 • Should the component be decontaminated or disposed of as waste?
- 35 • What is the most cost-effective method of decontaminating the component?
- 36 • Will the decontamination procedures adequately contain the contamination?

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<sup>2</sup> For the purposes of planning, the conclusion of shaft sealing is used by the DOE as the end of closure activities and the beginning of the Post-Closure Care Period.

1 Radiological and hazardous constituent surveys will be used in determining the presence of  
2 hazardous waste and hazardous waste residues in areas where spills or releases have  
3 occurred. Radiological surveys are described in Permit Attachment G3. For contamination that  
4 is cleaned up, once cleanup of the radioactivity has been completed, the surface will be  
5 sampled for the hazardous constituents associated with the EPA Hazardous Waste Numbers  
6 specified in Permit Attachment B to determine that they, too, have been cleaned up. Sampling  
7 and analysis protocols will be consistent with EPA's document SW-846 (EPA, 2015-1996).

#### 8 G-1e(23)(cb) Decontamination Activities

9 Once the extent of contamination is known, radiological control activities (e.g., decontamination,  
10 or fixing) activities will be planned and performed. Consistent with radiological control  
11 procedures pursuant to 10 CFR Part 835, decontamination activities will be performed, as  
12 necessary. Hazardous waste decontamination, if needed, will be conducted in accordance with  
13 the requirements of the Permit and the standards in 20.4.1.500 NMAC (incorporating 40 CFR  
14 Part 264). Radiological control and the control of hazardous waste residues are the primary  
15 criteria used in the design of decontamination activities. Radiological control procedures require  
16 that careful planning and execution be used in decontamination activities to prevent the  
17 exposure of workers beyond applicable standards and to prevent the further spread of  
18 contamination. Careful control of entry, cleanup, and ventilation are vital components of  
19 radiological control activities~~decontamination~~. The level of care mandated by DOE orders and  
20 occupational protection requirements results in closure activities that will exceed the 180 days  
21 allowed in 20.4.1.500 NMAC (incorporating 40 CFR §264.113(b)). Decontamination activities  
22 are included as item 4 above and are shown on the schedules for contingency closure and final  
23 facility closure (Figures G-2 and M-62G-3) as Activities~~activities~~ D, E, and F. These activities  
24 are anticipated to have a duration of 20 months for both contingency closure and for final facility  
25 closure. The result of these activities is the clean closure of the surface container management  
26 units. Under contingency closure, the other areas that have been decontaminated will not be  
27 closed. Instead, they will remain in use for continued waste management activities involving  
28 non-mixed waste. Under final facility closure, other areas that are decontaminated are eligible  
29 for closure.

30 The operating philosophy of the WIPP Project, which is described as "Start Clean – Stay Clean,"  
31 is intended to minimize the~~will provide for minimum~~ need for decontamination at closure.  
32 However, the need for decontamination techniques may arise. Decontamination activities are  
33 managed consistent with radiological control procedures pursuant to 10 CFR Part 835, which  
34 includes the as-low-as-reasonably-achievable (ALARA) principle. The ALARA principle is an  
35 approach/philosophy to radiation protection to manage and control exposures (both individual  
36 and collective) to the work force and to the general public to as low as is reasonable, taking into  
37 account social, technical, economic, practical, and public policy considerations. It is assumed  
38 that the process of localized surface decontamination will remove the hazardous waste  
39 constituents along with the radioactive waste constituents.

40 Decontamination activities will be coordinated with closure activities so that areas that have  
41 been decontaminated will not be recontaminated. ~~All waste~~Waste resulting from  
42 decontamination activities will be surveyed and analyzed for the presence of radioactive  
43 contamination and a determination of the hazardous constituents associated with the EPA  
44 Hazardous Waste Numbers specified in Part A of the Permit Application~~Permit Attachment B~~.  
45 The waste will be characterized as non-radioactive/non-hazardous, hazardous, mixed, or  
46 radioactive and will be packaged and handled appropriately. Mixed and radioactive waste,

1 classified as TRU mixed waste, will be managed in accordance with the applicable Permit  
2 requirements. Derived mixed waste collected during decontamination activities that are  
3 generated before repository shafts have been sealed will be emplaced in the facility, if  
4 appropriate, or will be managed together with decontamination derived waste collected after the  
5 underground is closed. This waste will be classified and shipped off site to an appropriate,  
6 permitted facility for treatment, if necessary, and for disposal.

#### 7 Removal of Hazardous Waste Residues

8 Because of the type of waste management activities that will occur at the WIPP facility, waste  
9 residues that may be encountered during the operation of the facility and at closure may include  
10 derived waste. Derived wastes result from the management of the waste containers or may be  
11 collected as part of the closure activities (such as those during which wipes were used to  
12 sample the containers and equipment for potential radioactive contamination or those involving  
13 solidified decontamination solutions, the handling of equipment designated for disposal, and the  
14 handling of residues collected as a result of spill cleanup). Derived wastes collected during the  
15 operation and closure of the WIPP facility will be identified and managed as TRU mixed wastes.  
16 These wastes will be disposed in ~~an~~the active underground HWDU. Decontamination and  
17 decommissioning derived wastes and equipment designated for disposal will be placed in ~~an~~the  
18 ~~last~~ underground HWDU ~~panel~~ before closure of that unit.

#### 19 Surface Container Storage Units

20 The procedures employed for waste receipt at the WIPP facility minimize the likelihood for any  
21 waste spillage to occur on the surface outside the WHB. TRU mixed waste is shipped to the  
22 WIPP facility in approved shipping containers (i.e., ~~Contact-Handled~~CH or ~~Remote-Handled~~RH  
23 Packages) that are not opened until they are inside the WHB. Therefore, it is unlikely that soil in  
24 the Parking Area Unit or elsewhere in the vicinity of the WHB will become contaminated with  
25 TRU mixed waste constituents as a result of TRU mixed waste management activities. An  
26 evaluation of the soils in the vicinity of the WHB will only be necessary if an event resulting in a  
27 release of hazardous waste has occurred outside the WHB.

28 The “Start Clean—Stay Clean” operating philosophy of the WIPP Project will minimize the need  
29 for decontamination of the WHB during decommissioning and closure. Procedures for opening  
30 shipping containers in the WHB limit the opportunity for waste spillage.

31 Should the need for decontamination of the WHB arise, the following methods may be  
32 employed, as appropriate, for the hazardous constituent/contaminant type and extent:

- 33 • Chemical cleaning (e.g., water, mild detergent cleanser, and polyvinyl alcohol)
- 34 • Nonchemical cleaning (e.g., sandblasting, grinding, high-pressure water spray, scabblers  
35 pistons and needle scalers, ice-blast technology, dry-ice blasting)
- 36 • Removal of contaminated components such as pipe and ductwork

37 Waste generated as a result of WHB decontamination activities will be managed as derived  
38 waste in accordance with applicable Permit requirements and will be emplaced in the last open  
39 underground HWDU for disposal.

### Waste Handling Contaminated Underground Equipment

The ~~waste~~ Waste shaft ~~Shaft~~ conveyance, ~~and~~ associated waste handling equipment, ~~and~~ underground support equipment (e.g., mining equipment, carts) that has become contaminated with hazardous waste constituents associated with TRU mixed waste will be decontaminated ~~to background~~ or characterized and dispositioned ~~be~~ (i.e., disposed of as derived waste) as part of both contingency and final facility closure. Procedures for detection and sampling will be as described above. Equipment cleanup will be as above using chemical or nonchemical techniques.

### Personnel Decontamination

Personal protective equipment (~~PPE~~) worn by personnel performing closure activities in areas determined to be contaminated will be disposed of appropriately. Disposable PPE used in such areas will be placed into containers and managed as TRU mixed waste. Non-disposable PPE will be decontaminated, if possible. Non-disposable PPE that cannot be decontaminated will be managed as TRU mixed waste.

In accordance with DOE policy, TRU mixed waste PPE will be considered to be contaminated with all of the hazardous waste constituents contained in the containers that have been managed within the unit being closed. Wastes collected as a result of closure activities and that may be contaminated with radioactive and hazardous constituents will be considered TRU mixed wastes. These wastes will be managed as derived wastes and disposed of in the final open underground HWDU, as described in Permit Attachment A2. Such waste, collected as the result of closure of the WIPP facility, will be disposed of in the final open underground HWDU. The requirements in Permit Part 2, Section 2.3.3.4, Chemical Incompatibility, apply to the derived wastes to be disposed upon final facility closure.

### Cleanup Criteria

Radiological decontamination will be managed consistent with radiological control procedures, or to less than or equal whatever levels that may be established by DOE<sup>3</sup> at the time of cleanup.

Hazardous waste decontamination will be conducted in accordance with standards in 20.4.1.500 NMAC (incorporating 40 CFR Part §264) or as incorporated into the Permit.

### Final Contamination Sampling and Quality Assurance

Verification samples will be analyzed by an approved laboratory that has been qualified by the DOE according to a written program with strict criteria. The QA requirements of EPA/SW-846, "Test Methods for Evaluating Solid Waste" (EPA, 2015-1996), will be met for hazardous constituent sampling and analyses.

### Quality Assurance/Quality Control

Because decisions about closure activities may be based, in part, on analyses of samples of potentially contaminated surfaces and media, a program to ensure reliability of analytical data is

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<sup>3</sup> Title 10 CFR Part 835

1 essential. Data reliability will be ensured by following a QA/QC program that mandates  
2 adequate precision and accuracy of laboratory analyses. Field documentation will be used to  
3 document the conditions under which each sample is collected. The documented QA/QC  
4 program in place at the WIPP facility will meet applicable RCRA QA requirements.

5 Field blanks and duplicate samples will be collected in the field to determine potential errors  
6 introduced in the data from sample collection and handling activities. To determine the potential  
7 for cross-contamination, rinsate blanks (consisting of rinsate from decontaminated sampling  
8 equipment) will be collected and analyzed in accordance with applicable EPA guidance. ~~At least~~  
9 ~~one rinsate blank will be collected for every 20 field samples. Duplicate samples will be~~  
10 ~~collected at a frequency of one duplicate sample for every ten field samples. In no case will less~~  
11 ~~than one rinsate blank or duplicate sample be collected for a field sampling effort. These blank~~  
12 ~~and duplicate samples will be identified and treated as separate samples.~~ Acceptance criteria  
13 for QA/QC hazardous constituent sample analyses will adhere to the most recent version of  
14 EPA SW-846 or other applicable EPA guidance.

15 G-1e(23)(de) Dismantling

16 G-1e(23)(de)(1) Dismantling During Final Closure

17 Final facility closure will include dismantling of structures on the surface and in the underground.  
18 These are items 6 and 7 above and are represented as Activity G in the final facility closure  
19 schedule in Figure M-62G-3. During dismantling, priority will be given to contaminated  
20 structures and equipment that cannot be decontaminated to assure these are properly disposed  
21 of in the remaining open underground HWDU in a timely manner. All such facilities and  
22 equipment are expected to be removed and disposed of 16 months after the initiation of closure.  
23 Dismantling of the balance of the facility, including those structures and equipment that are not  
24 included in the application and are not used for TRU mixed waste management, is anticipated to  
25 take an additional 66 months. ~~The~~ ~~it should be noted that the~~ placement of D&D waste into the  
26 final underground HWDU may, by necessity, involve the placement of uncontainerized bulk  
27 materials such as concrete components, building framing, structural members, disassembled or  
28 partially disassembled equipment, or containerized materials in non-standard waste boxes.  
29 Such placement will only occur if it can be shown that it is protective of human health and the  
30 environment and will be all items are described in an amendment to the Closure Plan.  
31 Identification of bulk items is not possible at this time since their size and quantity will depend on  
32 the extent of non-removable contamination.

33 G-1e(23)(de)(2) Dismantling of Permit-Related Surface Equipment, Structures, and  
34 Contaminated Soils During Partial Closure

35 Partial closure ~~may include~~ includes dismantling of Permit-related structures and/or equipment  
36 and removal of contaminated soils on the surface prior to final closure. During dismantling,  
37 priority will be given to structures and equipment contaminated with hazardous waste or  
38 hazardous waste constituents that cannot be decontaminated due to the presence of  
39 radioactivity to ensure these are properly disposed of at the WIPP facility or at another  
40 designated disposal facility in a timely manner. It should be noted that the placement of D&D  
41 waste into a WIPP HWDU may, by necessity, involve the placement of uncontainerized bulk  
42 materials such as concrete components, building framing, structural members, disassembled or  
43 partially disassembled equipment, or containerized materials in non-standard waste boxes.  
44 Such placement will only occur if it can be shown that it is protective of human health and the



1 environment and items are described in the operating record. Identification of bulk items is not  
2 possible at this time since their size and quantity will depend on the extent of non-removable  
3 contamination. The requirements in Permit Part 2, Section 2.3.3.4, Chemical Incompatibility,  
4 apply to these items to be disposed upon final facility closure.

#### 5 G-1e(23)(ed) Closure of Open Underground HWDU

6 The closure of the final underground HWDU is shown by Activity H in Figure M-62G-3. This  
7 closure will be consistent with the description in Section G-1e(1) and the design in Permit  
8 Attachment G1. Detailed closure schedules for underground HWDUs are given in Figure M-  
9 61G-2 and Table G-1.

#### 10 G-1e(23)(fe) Final Facility Closure

11 Final facility closure includes several activities designed to assure both the short-term isolation  
12 of the waste and the long-term integrity of the disposal system. These include the placement of  
13 plugs in boreholes that penetrate the salt and the placement of the repository sealing system. In  
14 addition, the surface will be returned to as near its original condition as practicable, and will be  
15 readied for the construction of markers and monuments that will provide permanent marking of  
16 the repository location and contents.

17 Figure M-43G-6 identifies where three existing boreholes overlie the proximate area of the  
18 repository footprint. Of these identified boreholes in Figure M-43G-6, all but ERDA-9 are  
19 terminated hundreds of feet above the repository horizon. Only ERDA-9, which is accounted for  
20 in long-term performance modeling, is drilled through the repository horizon, near the WIPP  
21 facility excavations.

22 To mitigate the potential for migration beyond the repository horizon, the DOE has specified that  
23 borehole seals be designed to limit the volume of water that could be introduced to the  
24 repository from the overlying water-bearing zones and to limit the volume of contaminated brine  
25 released from the repository to the surface or water-bearing zones.

26 Borehole plugging activities have been underway since the 1970s, from the early days of the  
27 development of the WIPP facility. Early in the exploratory phase of the project, a number of  
28 boreholes were sunk in Lea and Eddy counties. After the WIPP site was situated in its current  
29 location, an evaluation of ~~all~~ vertical penetrations was made by Christensen and Peterson  
30 (1981).

31 As an initial criterion, any borehole that connects a fluid-producing zone with the repository  
32 horizon becomes a plugging candidate.

33 Grout plugging procedures are routinely performed in standard oil-field operations; however,  
34 quantitative measurements of plug performance are rarely obtained. The Bell Canyon Test  
35 reported by Christensen and Peterson (1981) was a field test demonstration of the use of  
36 cementitious plugging materials and modification of existing industrial emplacement techniques  
37 to suit repository plugging requirements. Cement emplacement technology was found to be  
38 "generally adequate to satisfy repository plugging requirements." Christensen and Peterson  
39 (1981) also report "that grouts can be effective in sealing boreholes, if proper care is exercised  
40 in matching physical properties of the local rock with grout mixtures. Further, the reduction in  
41 fluid flow provided by even limited length plugs is far in excess of that required by bounding

1 safety assessments for the WIPP.” The governing regulations for plugging and/or abandonment  
2 of boreholes are summarized in Table G-3.

3 The proposed repository sealing system design will prevent water from entering the repository  
4 and will prevent gases or brines from migrating out of the repository. The proposed design  
5 includes the following subsystems and associated principal functions:

- 6 • Near-surface: to prevent subsidence at and around the shafts
- 7 • Rustler Formation: to prevent subsidence at and around the shafts and to ensure  
8 compliance with federal and New Mexico groundwater protection requirements
- 9 • Salado: to prevent transporting hazardous waste constituents beyond the point of  
10 compliance specified in Permit Part 5

11 The repository sealing system will consist of natural and engineered barriers within the WIPP  
12 repository that will withstand forces expected to be present because of rock creep, hydraulic  
13 pressure, and probable collapses in the repository and will meet the closure requirements of  
14 20.4.1.500 NMAC (incorporating 40 CFR §264.601 and §264.111). Permit Attachment G2  
15 presents the final repository sealing system design.

16 Once shaft sealing is completed, the Permittees will consider closure complete and will provide  
17 the NMED with a certification of such within 60 days.

#### 18 G-1e(23)(gf) Final Contouring and Revegetation

19 In the preparation of its Final Environmental Impact Statement (DOE, 1980), the DOE  
20 committed to restore the site to as near to its original condition as is practicable. This involves  
21 removal of access roads, unneeded utilities, fences, and any other structures built by the DOE  
22 to support WIPP operations. Provisions would be left for active post-closure controls of the site  
23 and for the installation of long-term markers and monuments for the purpose of permanently  
24 marking the location of the repository and waste. Permit Attachment H, Section H-1a(1)  
25 discusses the active and long-term controls proposed for the WIPP facility. Installation of  
26 borehole seals are anticipated to take 12 months, shaft seals 52 months, and final surface  
27 contouring 8 months.

#### 28 G-1e(23)(hg) Closure, Monuments, and Records

29 A record of the WIPP facilityProject shall be listed in the public domain in accordance with the  
30 requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.116). Active access controls will  
31 be employed for at least the first 100 years after final facility closure. In addition, a passive  
32 control system consisting of monuments or markers will be erected at the site to inform future  
33 generations of the location of the WIPP repository (see “Permanent Marker Conceptual Design  
34 Report” [DOE, 19951996]).

35 This Permit requires only a 30-year post-closure period. This is the maximum post-closure time  
36 frame allowed in an initial Permit for any facility, as specified in 20.4.1.500 NMAC (incorporating  
37 40 CFR §264.117(a)). The Secretary of the NMED may shorten or extend the post-closure care  
38 period at any time in the future prior to completion of the original post-closure period (30 years  
39 after the completion of construction of the shaft seals). The Permanent Marker Conceptual



1 Design Report and other provisions during the first 100 years after closure are addressed under  
2 another federal regulatory program.

3 Closure of the WIPP facility will contribute to the following:

- 4 • Prevention of the intrusion of fluids into the repository by sealing the shafts
- 5 • Prevention of human intrusion after closure
- 6 • Minimization of future physical and environmental surveillance

7 Detailed records shall be filed with local, state, and federal government agencies to ensure that  
8 the location of the WIPP facility is easily determined and that appropriate notifications and  
9 restrictions are given to anyone who applies to drill in the area. This information, together with  
10 land survey data, will be on record with the U.S. Geological Survey and other agencies. The  
11 federal government will maintain permanent administrative authority over those aspects of land  
12 management assigned by law. Details of post-closure activities are in Permit Attachment H.

### 13 G-1e(34) Performance of the Closed Facility

14 20.4.1.500 NMAC (incorporating 40 CFR §264.601) requires that a miscellaneous unit be  
15 closed in a manner that protects human health and the environment. The RCRA Part B permit  
16 application addressed the expected performance of the closed facility during the 30-year post  
17 closure period. Groundwater monitoring will provide information on the performance of the  
18 closed facility during the post-closure care period, as specified in Permit Attachment H, Section  
19 H-1a(2) (Monitoring) ~~of Permit Attachment H~~.

20 The principal barriers to the movement of hazardous constituents from the facility or the  
21 movement of waters into the facility are the halite of the Salado (natural barrier) and the  
22 repository seals (engineered barrier). Data and calculations that support this discussion ~~are~~were  
23 presented in Renewal Application Addendum N1 (DOE, 2020)~~the permit application~~. The  
24 majority of the calculations performed for the repository are focused on long-term performance  
25 and making predictions of performance over the first 300-years of the 10,000-~~years~~  
26 performance assessment. In the short term (300 years), the repository is reaching a steady  
27 state configuration where the hypothetical brine inflow rate is affected by the increasing  
28 pressure in the repository due to gas generation and creep closure. These three phenomena  
29 are related in the numerical modeling performed to support the permit application. The modeling  
30 parameters, assumptions and methodology ~~are~~were described in detail in Renewal Application  
31 Addendum N1 (DOE, 2020)~~the permit application~~.

### 32 G-2 Notices Required for Disposal Facilities

#### 33 G-2a Certification of Closure

34 Within 60 days after completion of closure activities for a HWMU (i.e., for each storage unit and  
35 each disposal unit), the Permittees will submit to the Secretary of the NMED a certification that  
36 the unit (and, after completion of final closure, the facility) has been closed in accordance with  
37 the specifications of this Closure Plan. The certification will be signed by the Permittees and by  
38 an independent New Mexico registered professional engineer. Documentation supporting the  
39 independent registered engineer's certification will be furnished to the Secretary of the NMED  
40 with the certification.

1 G-2b Survey Plat

2 Within 60 days of completion of closure activities for each underground HWDU, and no later  
3 than the submission of the certification of closure of each underground HWDU, the Permittees  
4 will submit to the Secretary of the NMED a survey plat indicating the location and dimensions of  
5 hazardous waste disposal units with respect to permanently surveyed benchmarks. The plat will  
6 be prepared and certified by a professional land surveyor and will contain a prominently  
7 displayed note that states the Permittees' obligation to restrict disturbance of the hazardous  
8 waste disposal unit. In addition, the land records in the Eddy County Courthouse, Carlsbad,  
9 New Mexico, will be updated through filing of the final survey plats.

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## TABLES

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**Table G-1  
 Anticipated Earliest Closure Dates for the Underground HWDUs**

HWDU	Operations Start	Operations End	Closure Start <sup>a</sup>	Closure End <sup>b</sup>
PANEL 1	3/99*	3/03*	3/03*	5/20*
PANEL 2	3/03*	10/05*	10/05*	5/20*
PANEL 3	4/05*	2/07*	2/07*	8/19*
PANEL 4	1/07*	5/09*	5/09*	8/19*
PANEL 5	3/09*	7/11*	7/11*	8/19*
PANEL 6	3/11*	1/14*	1/14*	8/19*
PANEL 7	9/13*	<del>5/22/24</del>	<del>6/22/24</del>	<del>12/22/22</del>
PANEL 8	<del>5/22/24</del>	<del>8/25/24</del>	<del>9/25/24</del>	<del>3/26/25</del>
PANEL 9**	N/A	N/A	N/A	N/A
PANEL 10	<del>8/25/28</del>	9/30	10/30	<del>3/31</del> SEE NOTE 4
<u>PANEL 11</u>	<u>8/25</u>	<u>7/28</u>	<u>8/28</u>	<u>2/29</u>
<u>PANEL 12</u>	<u>7/28</u>	<u>6/31</u>	<u>7/31</u>	<u>1/32</u>

\* Actual month and year

\*\* Panel 9 was not used for TRU mixed waste disposal. ~~Closures for~~ Panels 3, 4, 5 and 6 were ~~placed~~closed by placing closures in Panel 9 in the north-south mains (E-300, E-140, W-30 and W-170), as shown in Figure G-1, pursuant to Section G-1e(1).

<sup>a</sup> The point of closure start is defined as 60 days following notification to the NMED of closure.

<sup>b</sup> The point of closure end is defined as 180 days following placement of final waste in the panel.

~~NOTE 1: The time to close these areas may be extended depending on the nature and extent of the disturbed rock zone. The excavations that constitute these panels will have been opened for as many as 40 years so that the preparation for closure may take longer than the time allotted in Figure G-2. If this extension is needed, it will be requested as an amendment to the Closure Plan.~~

~~NOTE 2: For the purposes of preparing the closure schedule, the "Operations Start" date for each additional HWDU is the same as the "Operations End" date of the immediately prior HWDU. The "Operations End" date for each additional HWDU is 30 months after the "Operations Start" date. The "Closure Start" date for each additional HWDU is 1 month after the "Operations End" date. The "Closure End" date for each additional HWDU is 6 months after the "Operations End" date.~~

N/A--Not Applicable

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**Table G-2**  
**Anticipated Overall Schedule for Final Facility Closure Activities**

Activity	Final Facility Closure <u>Durations</u>	
	<u>Start Month</u>	<u>Stop Duration</u>
Notify NMED of Intent to Close WIPP (or to Implement Contingency Closure)	<del>Month -2</del> <u>October-2030</u>	N/A
Perform Contamination Surveys in both Surface Storage Areas	<del>Month 0</del> <u>October-2030</u>	<del>6 Months</del> <u>April-2034</u>
Sample Analysis	<del>Month 2</del> <u>December-2030</u>	<del>8 Months</del> <u>July-2034</u>
Decontamination as Necessary of both Surface Storage Areas	<del>Month 8</del> <u>June-2034</u>	<del>8 Months</del> <u>January-2032</u>
Final Contamination Surveys of both Surface Storage Areas	<del>Month 16</del> <u>February-2032</u>	<del>8 Months</del> <u>September-2032</u>
Sample Analysis	<del>Month 20</del> <u>June-2032</u>	<del>8 Months</del> <u>January-2033</u>
Prepare and Submit Container Management Unit Closure Certification	<del>Month 28</del> <u>February-2033</u>	<del>4 Months</del> <u>May-2033</u>
Dispose of Closure-Derived Waste <u>and Equipment*</u>	<del>Month 2</del> <u>November-2030</u>	<del>14 Months</del> <u>January-2032</u>
Closure of Open Underground HWDU panel	<del>Month 16</del> <u>February-2032</u> <sup>*</sup>	<del>8 Months</del> <u>September-2032</u>
Install Borehole Seals	<del>Month 24</del> <u>October-2032</u>	<del>12 Months</del> <u>September-2033</u>
Install Repository Seals	<del>Month 32</del> <u>June-2033</u>	<del>52 Months</del> <u>September-2037</u>
Recontour and Revegetate	<del>Month 84</del> <u>October-2037</u>	<del>8 Months</del> <u>May-2038</u>
Prepare and Submit Final (Contingency) Closure Certification	<del>Month 84</del> <u>October-2037</u>	<del>2 Months</del> <u>May-2038</u>
Post-closure Monitoring	<del>Month 86</del> <u>July-2038</u>	<del>Up to 30 Years</del> <u>N/A</u>

N/A--Not Applicable

Refer to Figures M-62G-3 and Permit Attachment G1, Appendix G1-BG-4 for precise activity titles.

\*The requirements in Permit Part 2, Section 2.3.3.4, Chemical Incompatibility, apply to the equipment to be abandoned upon final facility closure.

~~\*This assumes the final waste is placed in this unit in January 2032 and notification of closure for this HWDU is submitted to the NMED in December 2031.~~

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**Table G-3  
 Governing Regulations for Borehole Abandonment**

Federal or State Land	Type of Well or Borehole	Governing Regulation	Summary of Requirements
Both	Groundwater Surveillance	State and Federal regulation in effect at time of abandonment	Monitor wells no longer in use shall be plugged in such a manner as to preclude migration of surface runoff or groundwater along the length of the well. Where possible, this shall be accomplished by removing the well casing and pumping expanding cement from the bottom to the top of the well. If the casing cannot be removed, the casing shall be ripped or perforated along its entire length if possible, and grouted. Filling with bentonite pellets from the bottom to the top is an acceptable alternative to pressure grouting.
Federal	Oil and Gas Wells	43 CFR Part 3160, §§ 3162.3-4	The operator shall promptly plug and abandon, in accordance with a plan first approved in writing or prescribed by the authorized officer.
Federal	Potash	43 CFR Part 3590, § 3593.1	(b) Surface boreholes for development or holes for prospecting shall be abandoned to the satisfaction of the authorizing officer by cementing and/or casing or by other methods approved in advance by the authorized officer. The holes shall also be abandoned in a manner to protect the surface and not endanger any present or future underground operation, any deposit of oil, gas, or other mineral substances, or any aquifer.
State	Oil and Gas Well Outside the Oil-Potash Area	State of New Mexico, Oil Conservation Division, Rule 202 (eff. 3-1-91)	<p>B. Plugging</p> <p>(1) Prior to abandonment, the well shall be plugged in a manner to permanently confine all oil, gas, and water in the separate strata where they were originally found. This can be accomplished by using mud-laden fluid, cement, and plugs singly or in combination as approved by the Division on the notice of intention to plug.</p> <p>(2) The exact location of plugged and abandoned wells shall be marked by the operator with a steel marker not less than four inches (4") in diameter, set in cement, and extending at least four feet (4') above mean ground level. The metal of the marker shall be permanently engraved, welded, or stamped with the operator name, lease name, and well number and location, including unit letter, section, township, and range.</p>
State	Oil and Gas Wells Inside the Oil-Potash Area	State of New Mexico, Oil Conservation Division, Order No. R-111-P (eff. 4-21-88)	<p>F. Plugging and Abandonment of Wells</p> <p>(1) All existing and future wells that are drilled within the potash area, shall be plugged in accordance with the general rules established by the Division. A solid cement plug shall be provided through the salt section and any water-bearing horizon to prevent liquids or gases from entering the hole above or below the salt selection.</p> <p>It shall have suitable proportions—but no greater than three (3) percent of calcium chloride by weight—of cement considered to be the desired mixture when possible.</p>

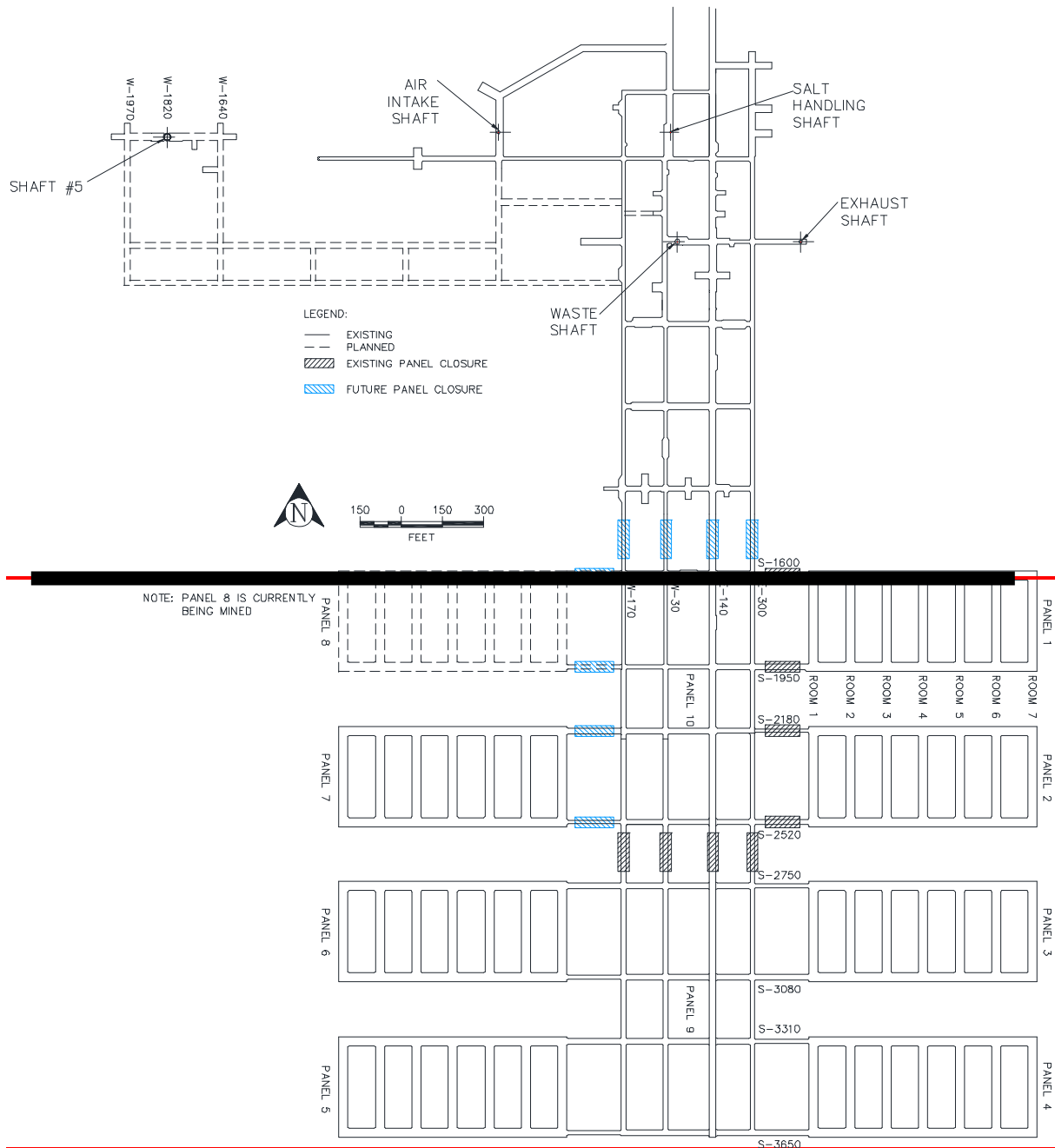
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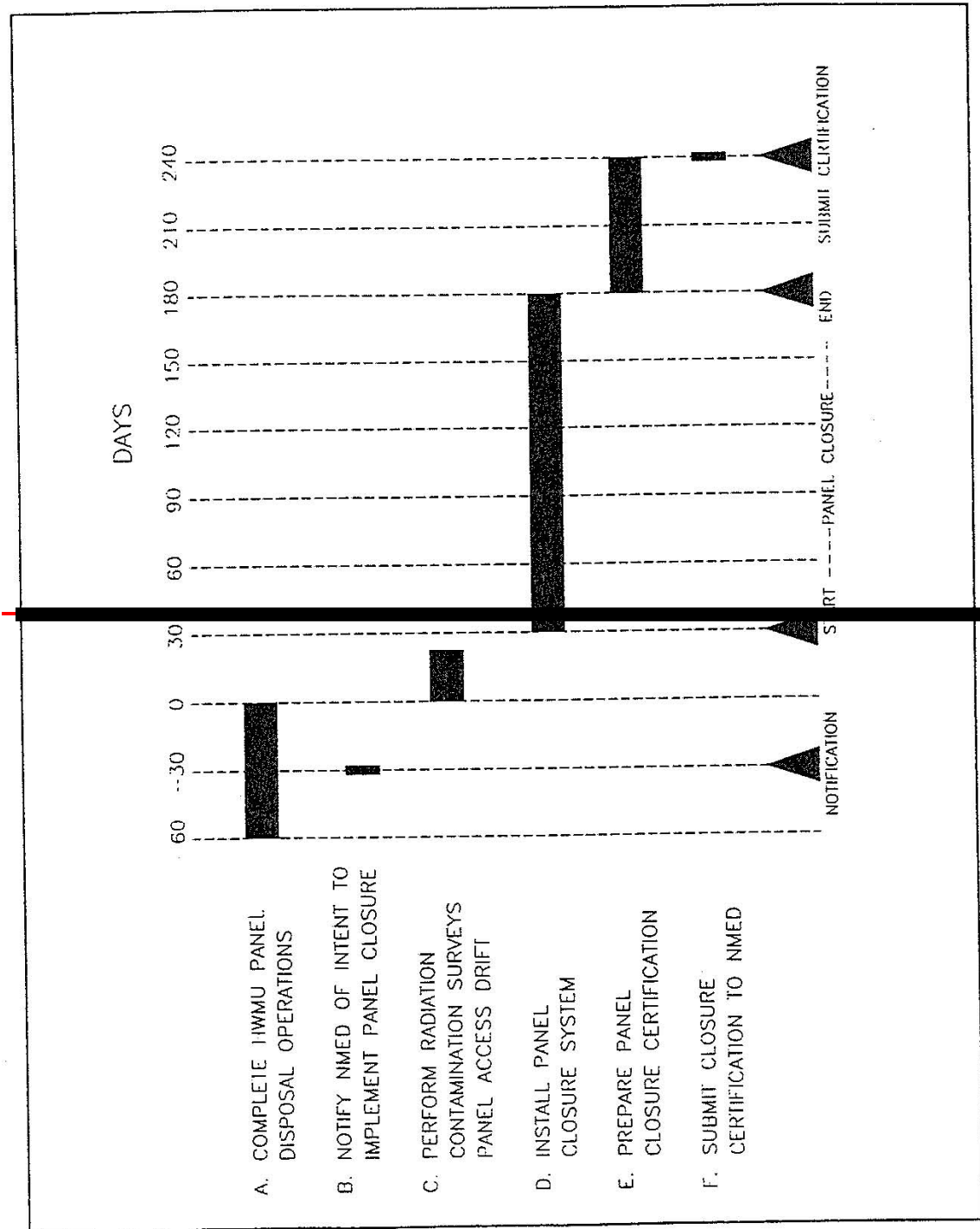
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**FIGURES**

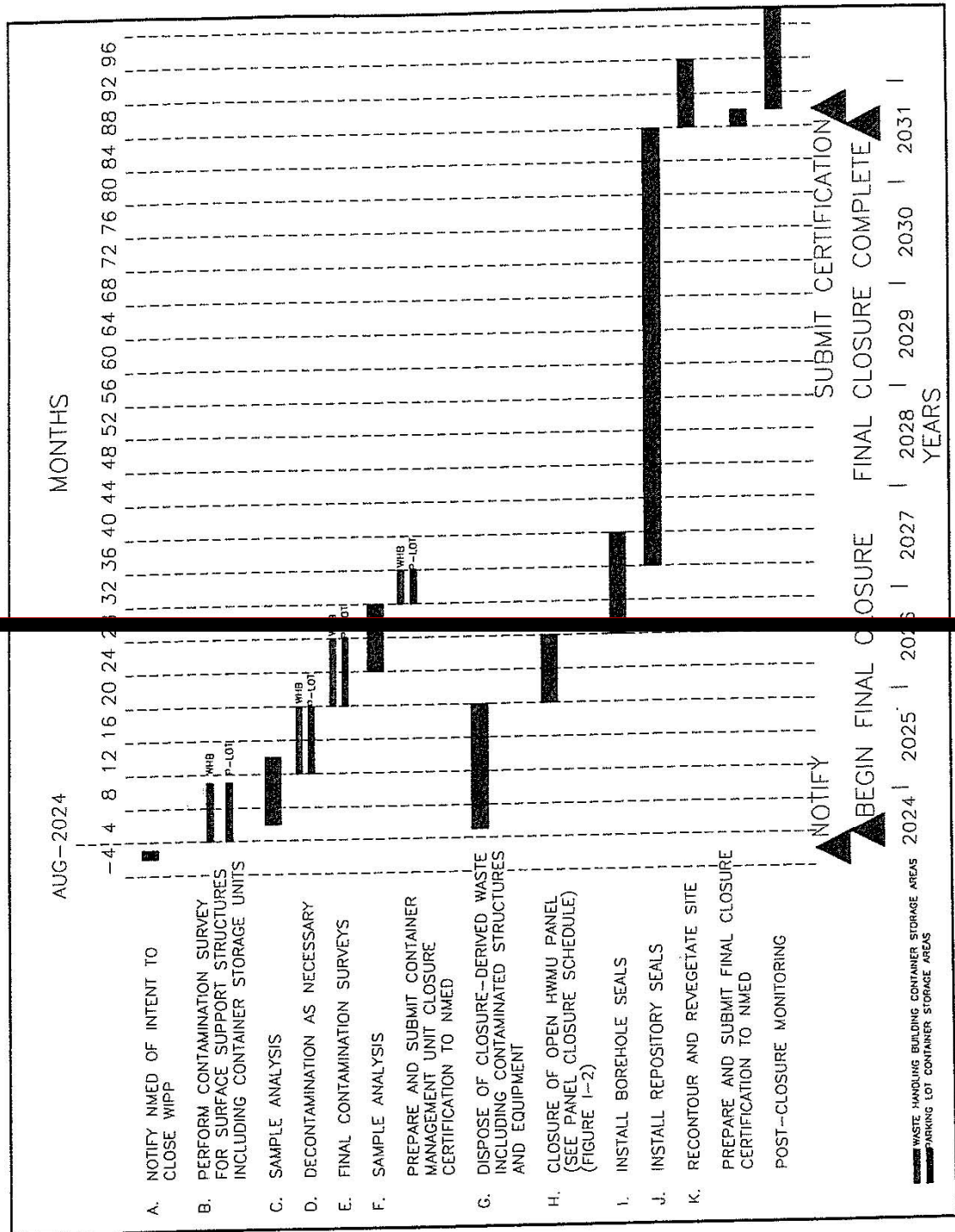




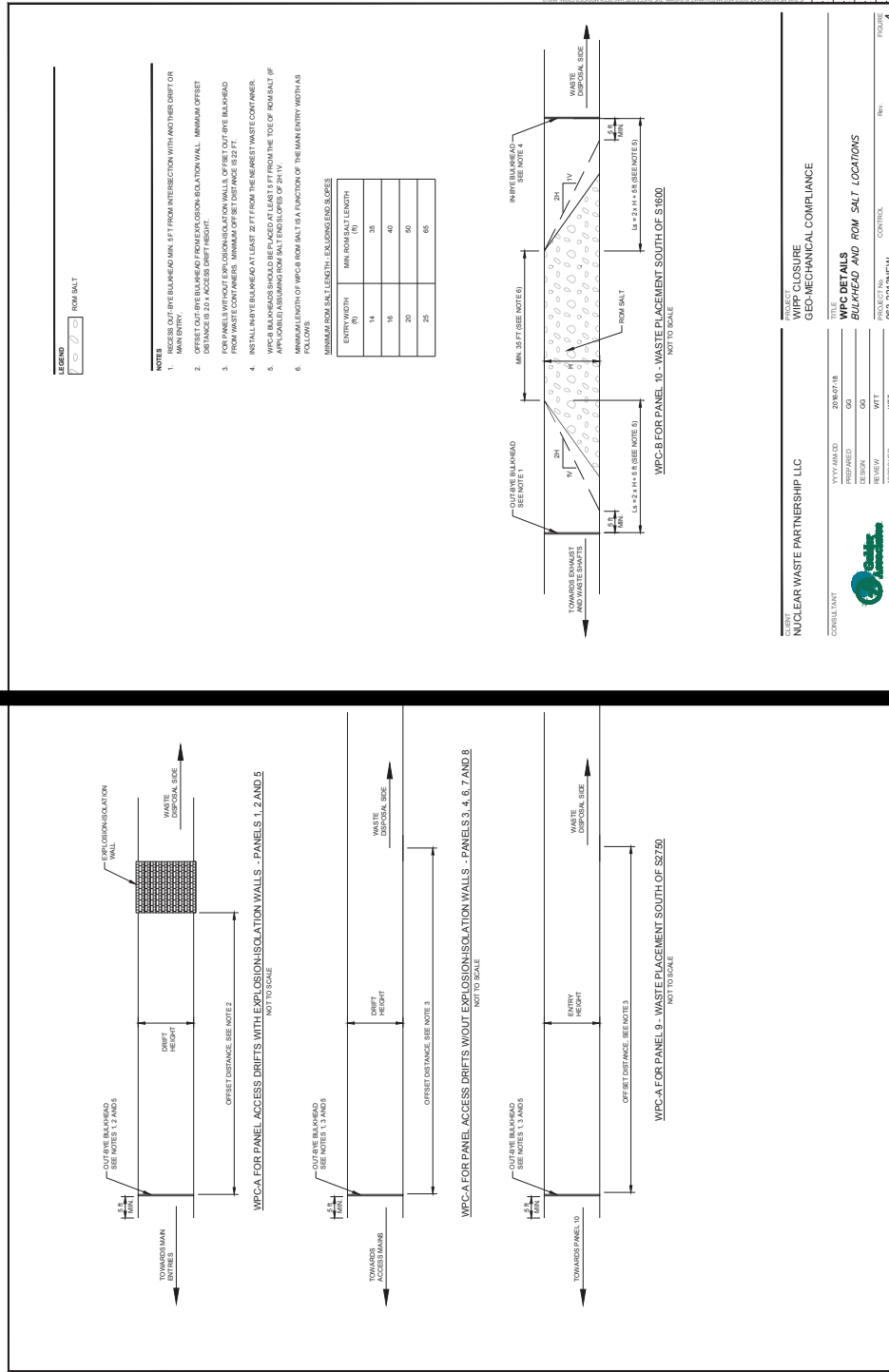
**Figure G-1**  
**Location of Underground HWDUs and Anticipated Closure Locations**



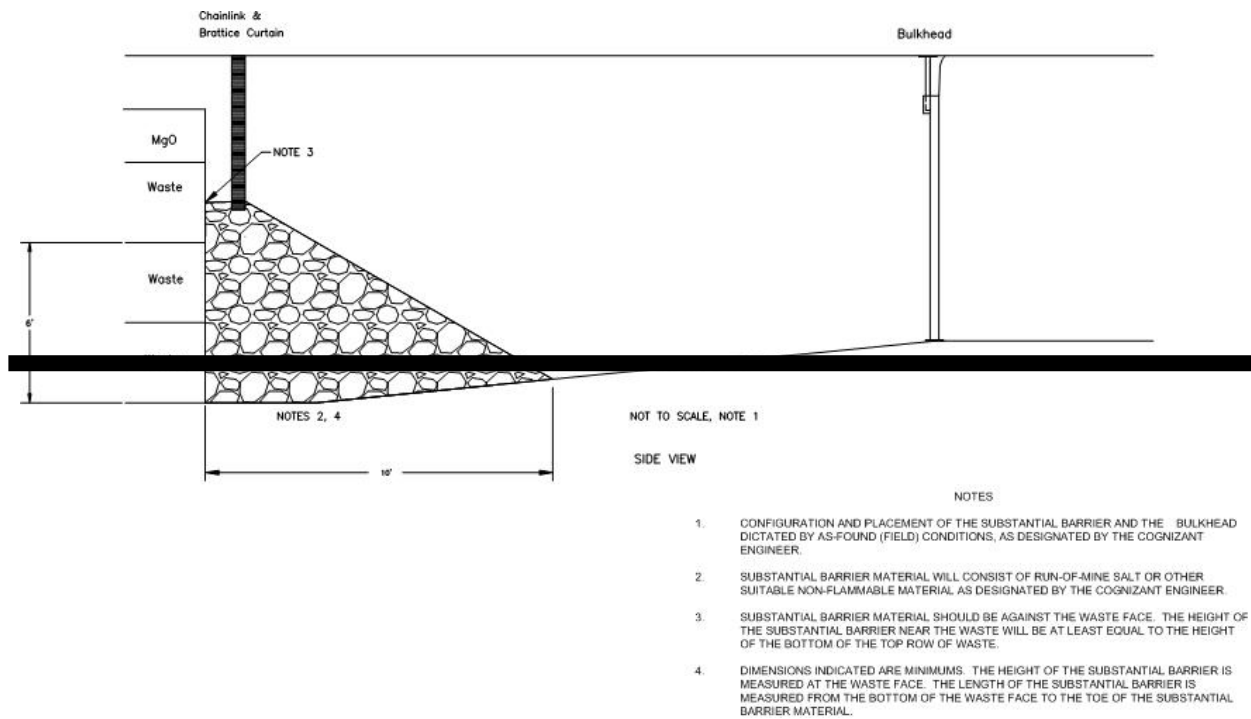
**Figure G-2**  
**WIPP Panel Closure Schedule**



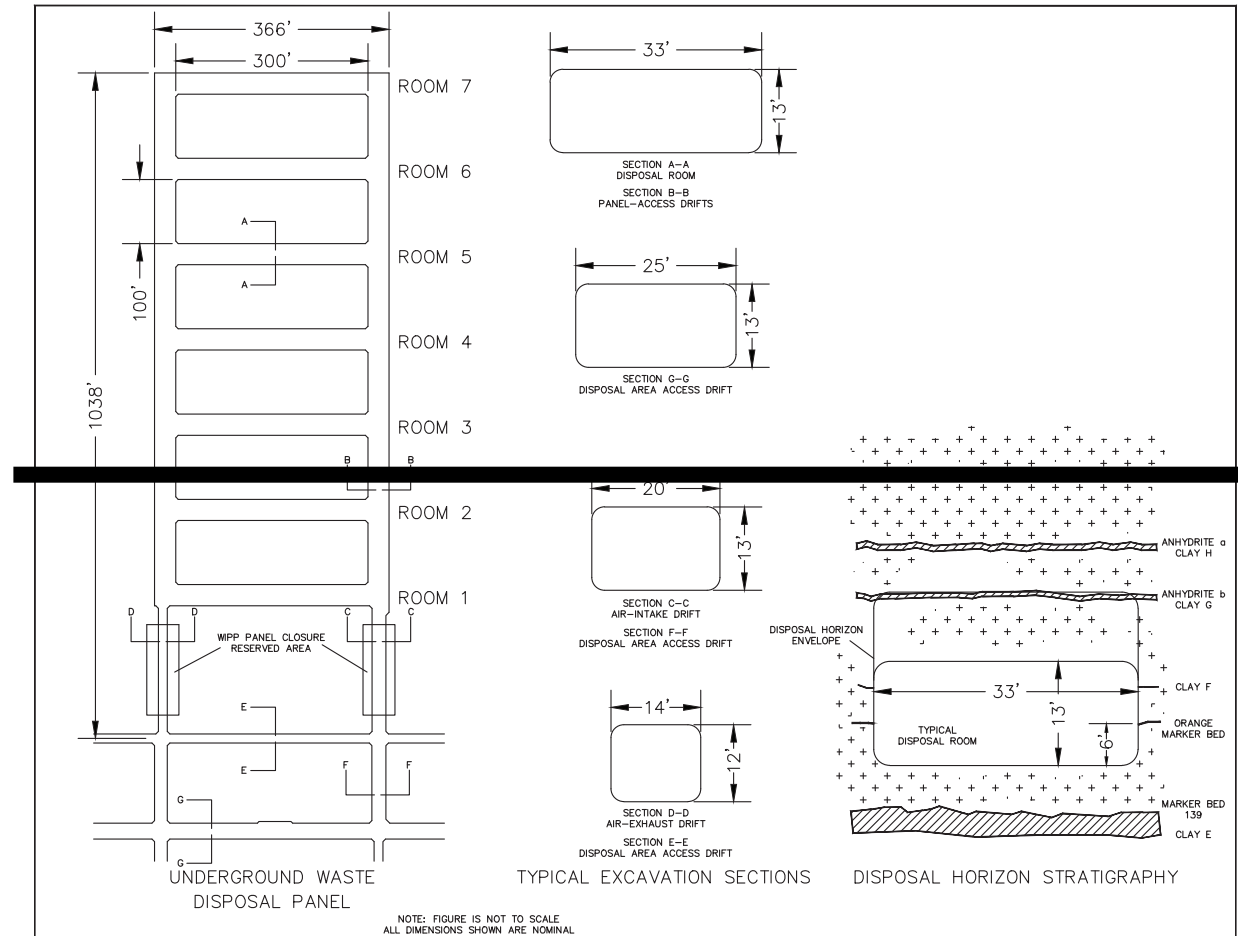
**Figure G-3**  
**WIPP Facility Final Closure 84-Month Schedule**



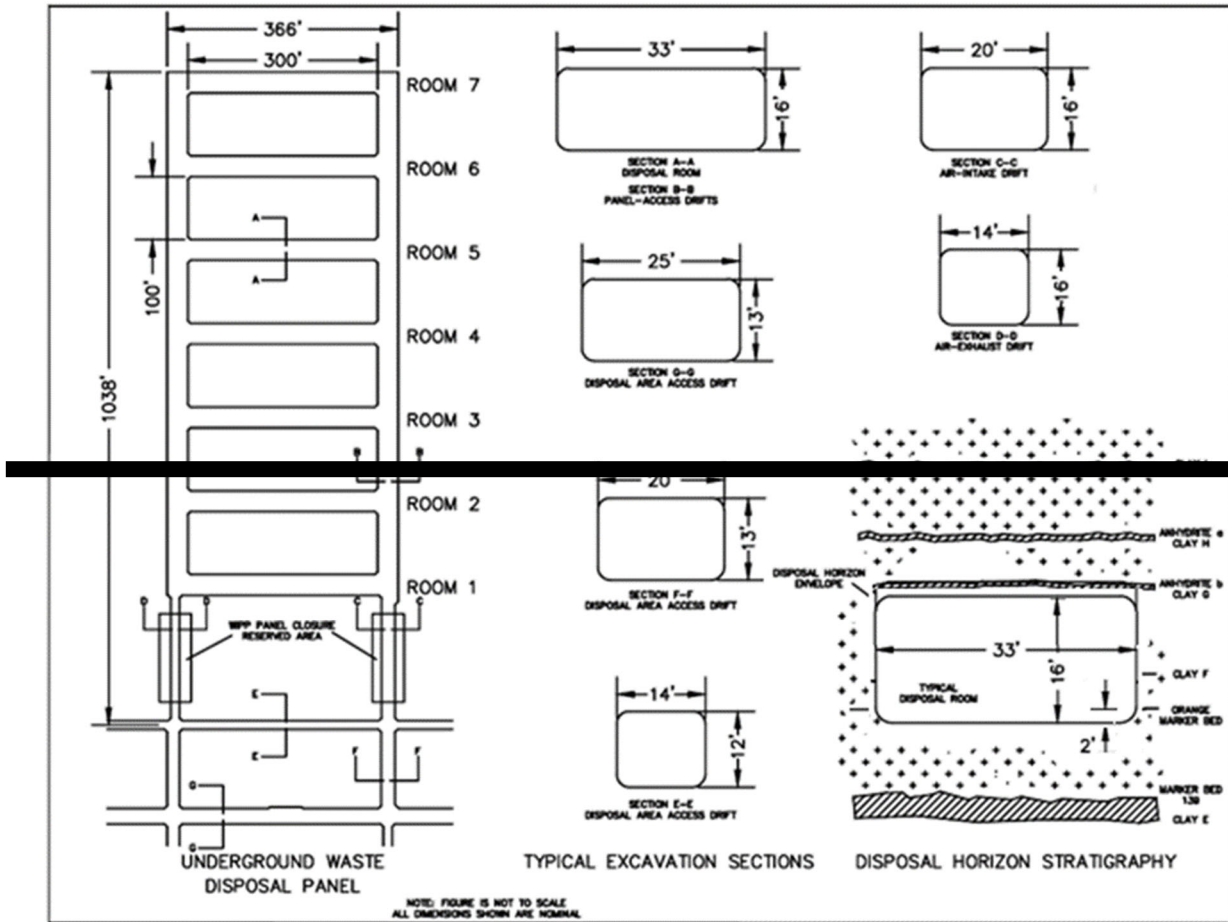
**Figure G-4**  
**Bulkhead and ROM Salt Locations**



**Figure G-4a**  
**Typical Substantial Barrier and Bulkhead**

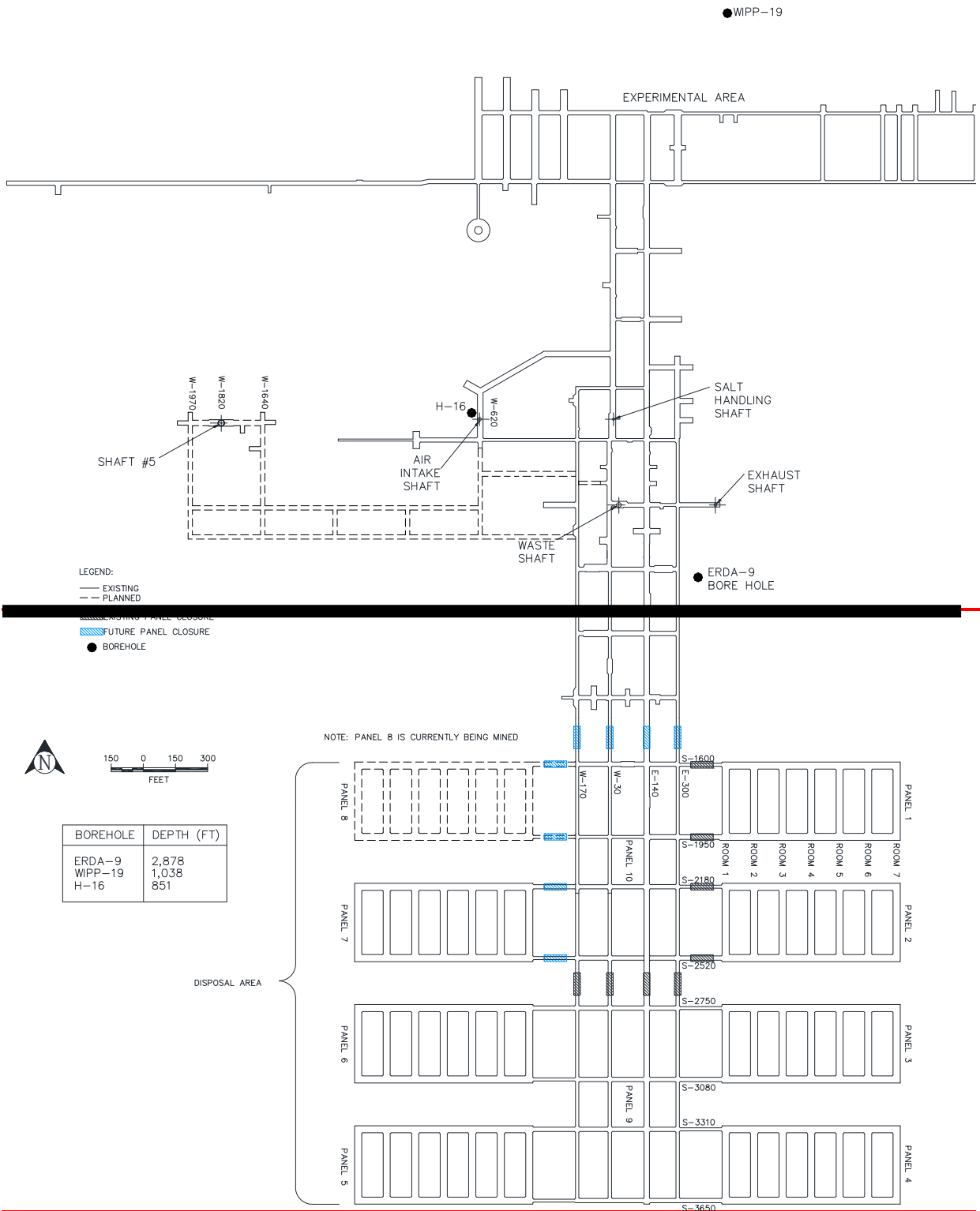


**Figure G-5a**  
**Typical Disposal Panel Dimensions for Panels 1-7**



**Figure G-5b**  
**Typical Disposal Panel Dimensions for Panel 8**

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**Figure G-6**  
**Approximate Locations of Boreholes in Relation to the WIPP Underground**



## **ATTACHMENT G1**

### **WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS**

Adapted from the October 2016 Design Report – WIPP Panel Closure

## ATTACHMENT G1

### WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

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**LIST OF ABBREVIATIONS/ACRONYMS**

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Permit	WIPP Hazardous Waste Facility Permit
<del>RCRA</del>	<del>Resource Conservation and Recovery Act</del>
ROM	run-of-mine
<del>VOC</del>	<del>volatile organic compound</del>
WIPP	Waste Isolation Pilot Plant
WPC	WIPP Panel Closure

## ATTACHMENT G1

### WIPP PANEL CLOSURE DESIGN DESCRIPTION AND SPECIFICATIONS

#### G1-1 Introduction

An important aspect of repository operations at the Waste Isolation Pilot Plant (**WIPP**) facility is the closure of waste disposal panels, also referred to as Hazardous Waste Disposal Units (**HWDUs**), under the Resource Conservation and Recovery Act (**RCRA**). Each one of Panels 1 through 8, 11, and 12 consists of a panel air-intake drift, a panel air-exhaust drift, and seven rooms. Panels 9 and 10 consist of the main entries (North to South) and cross entries (East to West) to Panels 1-8. The closure of individual panels shall meet the closure requirements described in Attachment G and shall be built in accordance with the specifications in this attachment. This attachment describes the panel closure design and presents the applicable specifications and requirements for fabrication, installation, and maintenance of the WIPP Panel Closure (**WPC**).

The design discussed in this attachment is based on the Design Report, prepared by Golder Associates (Golder, 2016). Calculations demonstrating compliance with the volatile organic compounds (**VOC**) emission standards are included with the Design Report. Calculations addressing the performance of the WPC under the geometries in the access drifts and main entries, including an assessment of the required length of the run-of-mine (**ROM**) salt component, are also included in the Design Report. The specifications for standard steel bulkheads and ROM salt are included as Attachment G1 Appendix G1-A *Technical Specifications* and Attachment G1 Appendix G1-B *Drawings*.

#### G1-2 WPC Description

The WPC consists of WPC-A and WPC-B. The WPC-A is the design for Panels 1 through 8, 11, and 12. They shall be closed using out-by bulkheads in the panel intake and exhaust drifts. The WPC-A with ROM salt is also installed in Panel 9 in the main entries between S-2750 and S-2520 as the closures for Panels 3 through 6. The WPC-B is the closure design for Panel 10. It consists of a combination of in-by and out-by bulkheads and a length of ROM salt placed in the main entries north of S-1600. The WPC locations are depicted in Permit Attachment G1, Appendix G1-B Figure G1-1.

#### G1-2a Permit Design Requirements

The applicable design requirements are provided in Permit Attachment G, Section G-1e(1). The WPC meets these design requirements as documented in the Design Report.

#### G1-2b Design Component Descriptions

The following subsections present a description of the WPC components. Individual specifications address shaft and underground access and materials handling, construction quality control, treatment of surfaces in the closure areas, and applicable design and construction standards.

The WPC-A consists of a standard steel bulkhead in the panel access drifts ~~for Panels 1 through 8~~, near the intersection with the main entries or relocated to the main north-south drifts

1 as determined by the geotechnical engineer. This bulkhead is referred to as the closure/out-by  
2 bulkhead and it will be maintained for as long as it is accessible. Additional ventilation barriers  
3 may remain in the panels as part of the operational controls prior to WPC installation. These  
4 ventilation barriers include steel bulkheads, brattice cloth and chain link, as well as concrete  
5 block walls in Panels 1, 2, and 5. These ventilation barriers are not part of the WPC design and  
6 will not impact the WPC-A bulkheads nor will they impede construction and maintenance of  
7 closure bulkheads. WPC-A ~~with ROM salt has been~~ [will also be](#) emplaced in the main entries  
8 between Panels 9 and 10 (between S-2520 and S-2750).

9 The WPC-B design for the closure installed in the main entries north of Panel 10 (north of  
10 S-1600) consists of ROM salt between in-by and out-by bulkheads as shown in [Permit](#)  
11 [Attachment G1, Appendix G1-B](#)~~Figure G1-2~~.

### 12 G1-2b(1) Steel Bulkhead

13 A bulkhead ([shown in Permit Attachment G1, Appendix G1-B](#)~~Figure G1-3~~) serves to close  
14 panels by blocking ventilation to the intake and exhaust access drifts of the panel and  
15 preventing personnel access. This use of a bulkhead is a standard practice and the closure  
16 bulkhead shall be constructed as a typical WIPP facility bulkhead. The bulkhead will consist of a  
17 steel member frame covered with sheet metal. Telescoping tubular steel or functionally  
18 equivalent material shall be used to bolt the bulkhead to the floor and roof. Flexible flashing  
19 material such as a rubber conveyor belt (or other appropriate material) will be attached to the  
20 steel frame and the salt as a gasket, thereby providing an effective yet flexible blockage to  
21 ventilation air. The steel bulkheads will be maintained for as long as they are accessible to  
22 workers. In this regard, accessible bulkheads will be repaired, renovated, or replaced as  
23 required. Permit Attachment E, Table E-1 provides the schedule for inspecting panel closure  
24 bulkheads.

### 25 G1-2b(2) ROM Salt

26 Run-of-mine salt material from mining operations will be used in the main entries north of  
27 Panel 10. The salt will be emplaced to a specified design length based on geomechanical  
28 calculations described in detail in the Design Report.

### 29 G1-3 Constructability

30 The WPC-A and WPC-B can be constructed using available technologies for the construction of  
31 bulkheads. The use of bulkheads is a standard practice at the WIPP facility and the closure  
32 bulkheads will be constructed as typical WIPP facility bulkheads. Run-of-mine salt is available  
33 from mining operations in sufficient quantities. The construction methods and materials required  
34 for the ROM salt placement north of Panel 10 will use available technologies as discussed in the  
35 Design Report.

36 Conventional WIPP facility mining practices will be used for the WPC construction. Work  
37 packages will be prepared for the fabrication and installation of steel bulkheads and will list the  
38 materials used, the equipment used, special precautions, and limitations. Each work package  
39 will address location-specific prerequisites for installing the closure components, will contain the  
40 bulkhead specifications, as appropriate, and the location where the closure components are to  
41 be installed. Details on the conventional mining practices and work package preparation are

1 discussed in the Design Report and, further construction details are given in the technical  
2 specifications included in Attachment G1, Appendix G1-A.

3 G1-4 Technical Specifications

4 The technical specifications are included in Attachment G1, Appendix G1-A, and are listed in  
5 Table G1-1.

6 G1-5 Drawings

7 The drawings are included in Attachment G1, Appendix G1-B and are listed in Table G1-2.

8 G1-6 References

9 Golder Associates Inc. (Golder), 2016, Design Report – WIPP Panel Closure report number  
10 0632213 R1 Rev 1, Lakewood, Colorado, October 2016.

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Section 01600	Material and Equipment
<b>Division 2 – Site Work</b>	
Section 02010	Mobilization and Demobilization
Section 02222	Excavation
<b>Division 3 – WPC Components</b>	
Section 03100	Run-of-Mine Salt
Section 03200	Steel Bulkheads

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**Table G1-2  
WIPP Panel Closure Drawings**

<b>Drawing Number</b>	<b>Title</b>
262-001	WIPP Panel Closure (WPC) Title Sheet
262-002	WPC Locations
262-003	Typical Panel Layout and Mined Entry Cross-Sections
262-004	WPC Details – Bulkhead and ROM Salt Locations
262-005	WPC Details – Bulkhead Front-View and Attachment Detail

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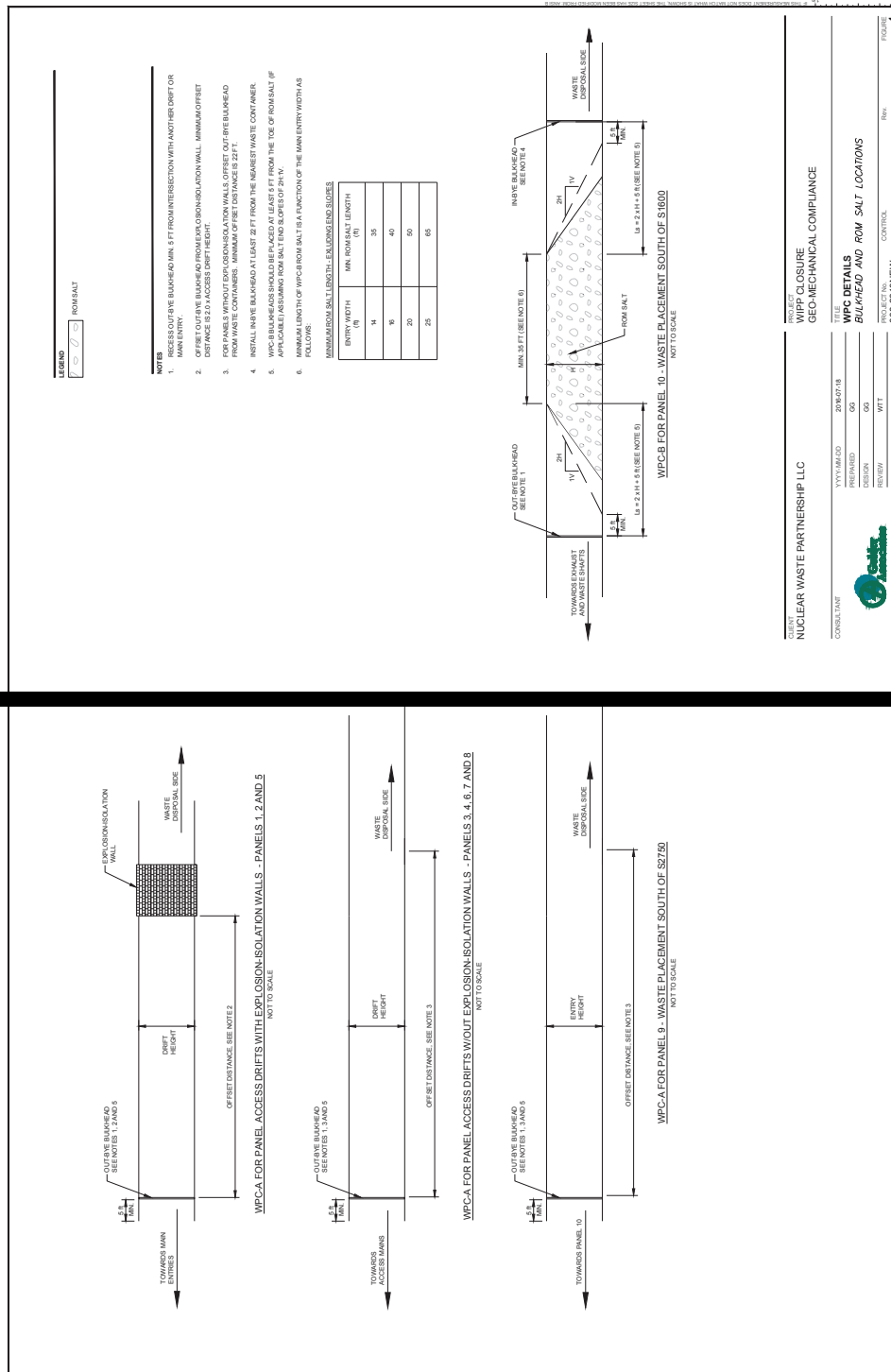
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**FIGURES**

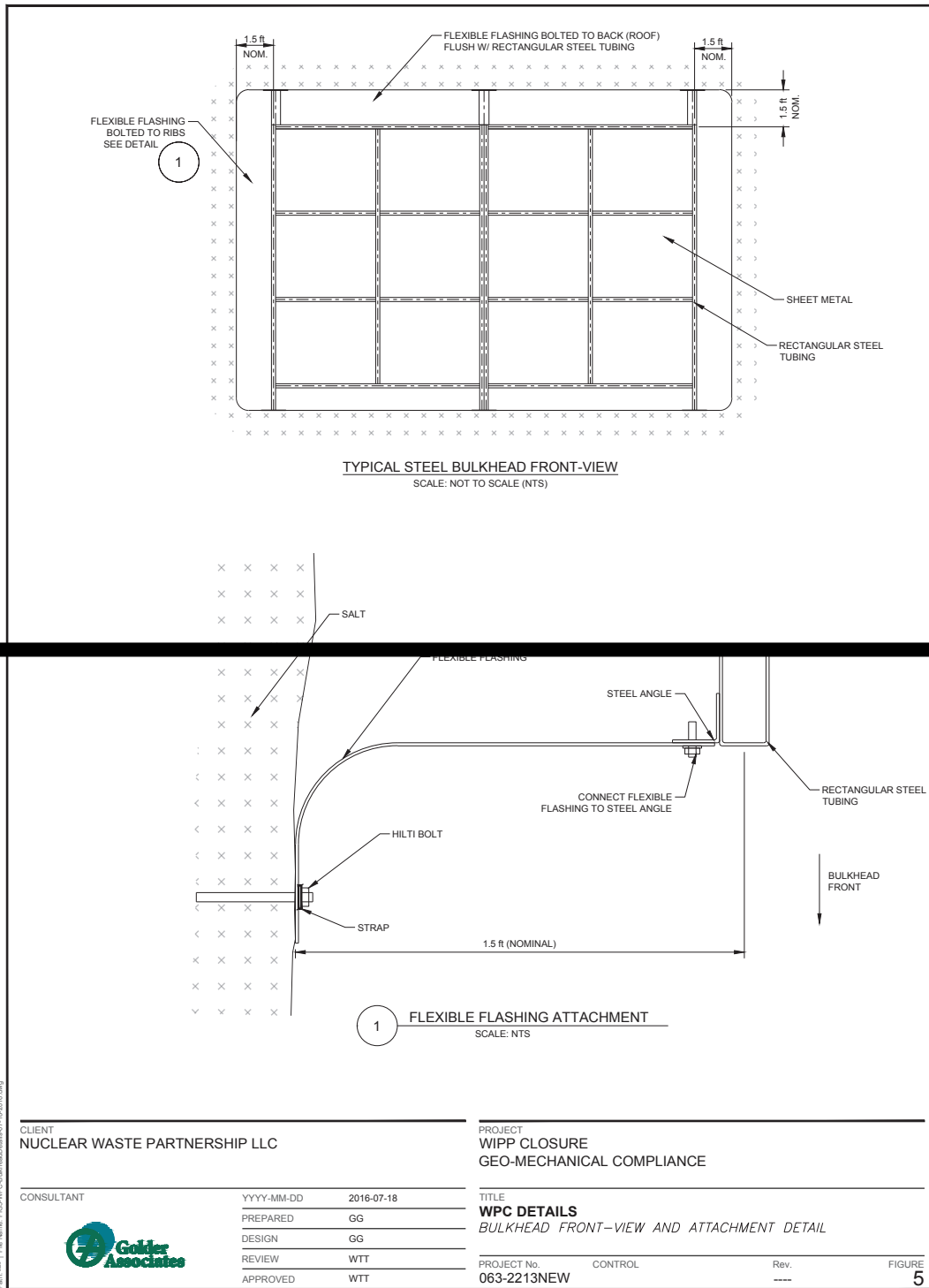
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Figure G1-1  
 WPC Locations



**Figure G1-2**  
**WPC Details – Bulkhead and Run-of-Mine Salt Locations**



**Figure G1-3**  
**WPC Details – Bulkhead Front-View and Attachment Detail**

**ATTACHMENT G1  
APPENDIX G1-A  
TECHNICAL SPECIFICATIONS  
WIPP PANEL CLOSURE  
WASTE ISOLATION PILOT PLANT  
CARLSBAD, NEW MEXICO**

**ATTACHMENT G1  
 APPENDIX G1-A**

**TECHNICAL SPECIFICATIONS**

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## **DIVISION 1 – GENERAL REQUIREMENTS**

## Section 01010 – Summary of Work

### Part 1 – General

#### 1.1 Scope

This section includes the following:

- Scope of Work
- Definitions and Abbreviations
- List of Drawings
- Work by Others
- Contractors Use of Site
- Contractors Use of Facilities
- Work Sequence
- Work Plan
- Health and Safety Plan (**HASP**)
- Contractor Quality Control Plan (**CQCP**)
- Submittals

#### 1.2 Scope of Work

The contractor shall furnish all labor, materials, equipment, and tools to construct Waste Isolation Pilot Plant (**WIPP**) Panel Closure (**WPC**), including the WPC-A for Panels 1 through 9, and the WPC-B to the north of Panel 10. Each WPC-A in each of Panels 1-9 consists of a single steel bulkhead while the WPC-B north of Panel 10 will include dual bulkheads with run-of-mine (**ROM**) salt installed between. Run-of-mine salt will also be used as part of the Panel 9 closure. Nuclear Waste Partnership LLC (**NWP**) may elect to perform any portion or all of the work herein. Details are as follows:

- Install WPC-A in the air-intake and the air-exhaust drifts of Panel 1, 2, and 5 with the explosion-isolation walls (block walls), as shown on the drawings and described in these specifications. The WPC-A consists of an out-bye steel bulkhead. Alternatively, install WPC-A in the main entries and cross-drifts in order to close multiple panels simultaneously based on the direction of the geotechnical engineer.
- Install WPC-A in the air-intake and the air-exhaust drifts of Panel 3, 4, 6, 7, and 8 without the explosion-isolation walls (block walls), as shown on the drawings and described in these specifications. The WPC-A consists of an out-bye steel bulkhead. Alternatively, install WPC A in the main entries access mains and cross-drifts in order to close multiple panels simultaneously based on the direction of the geotechnical engineer.
- Install WPC-A in the main entries between Panels 9 and 10, as shown on the drawings and described in these specifications. The WPC-A consists of an out-bye steel bulkhead. Run-of-mine salt will also be used as part of the Panel 9 closure.
- Install WPC-B in the main entries north of Panel 10, as shown on the drawings and described in these specifications. The WPC-B consists of an in-bye and an out-bye steel bulkhead with ROM salt installed between.

- 1 Unless otherwise agreed by NWP, the contractor shall use NWP supplied equipment  
2 underground. Such use shall be coordinated with NWP and may include the use of NWP  
3 qualified operators.
- 4 The scope of work shall include but not necessarily be limited to the following units of work:
- 5 • Develop work plan, HASP, and CQCP, and submit for approval
  - 6 • Prepare and submit any other plans requiring approval
  - 7 • Mobilize to site
  - 8 • Coordinate construction with WIPP operations
  - 9 • Perform the following operations for the air-intake drift and the air-exhaust drift that do  
10 not contain block walls (Panels 3, 4, 6, 7, and 8):
    - 11 – Prepare the surfaces for the out-bye steel bulkhead placement
    - 12 – Construct the out-bye steel bulkhead
    - 13 – Clean up construction areas in underground and above ground
    - 14 – Submit required record documents
    - 15 – Demobilize from site
  - 16 • Perform the following operations for the air-intake drift and the air-exhaust drift with block  
17 walls (Panels 1, 2, and 5):
    - 18 – Prepare the surfaces for the out-bye steel bulkhead placement
    - 19 – Construct the out-bye steel bulkhead
    - 20 – Clean up construction areas in underground and above ground
    - 21 – Submit required record documents
    - 22 – Demobilize from site
  - 23 • Perform the following operations for the main entries between Panels 9 and 10:
    - 24 – Prepare the surfaces for the ROM salt placement
    - 25 – Place ROM salt material in multiple layers
    - 26 – Prepare the surfaces for the out-bye steel bulkhead placement
    - 27 – Construct the out-bye steel bulkhead
    - 28 – Clean up construction areas in underground and above ground
    - 29 – Submit required record documents
    - 30 – Demobilize from site
  - 31 • Perform the following operations for the main entries north of Panel 10:
    - 32 – Prepare the surfaces for the in-bye steel bulkhead placement
    - 33 – Construct the in-bye steel bulkhead
    - 34 – Prepare the surfaces for the ROM salt placement
    - 35 – Place ROM salt material in multiple layers
    - 36 – Prepare surfaces for the out-bye steel bulkhead placement
    - 37 – Construct the out-bye steel bulkhead

- 1 - Clean up construction areas in underground and above ground
- 2 - Submit required record documents
- 3 - Demobilize from site

### 4 **1.3 Definitions and Abbreviations**

#### 5 **Definitions**

6 Block wall – Existing mortared concrete block wall adjacent to the panel waste disposal area as  
7 shown in the drawings; also known as explosion-isolation wall

8 Creep – Viscoplastic deformation of salt under deviatoric stress

9 Partial closure – The process of rendering a part of the hazardous waste management unit in  
10 the underground repository inactive and closed according to approved facility closure plans

11 Run-of-mine (**ROM**) salt – A salt backfill obtained from mining operations and emplaced in an  
12 uncompact state

13 Volatile organic compound (**VOC**) – Any VOC with Hazardous Waste Facility Permit emission  
14 limits

15 Nuclear Waste Partnership LLC (**NWP**) – the construction management authority

#### 16 **Abbreviations/Acronyms**

17	ACI	American Concrete Institute
18	ANSI	American National Standards Institute
19	ASTM	American Society for Testing and Materials
20	CFR	Code of Federal Regulations
21	CQCP	Contractor Quality Control Plan
22	DOE	U.S. Department of Energy
23	DWG	drawing
24	EPA	U.S. Environmental Protection Agency
25	HASP	Health and Safety Plan
26	JHA	Job Hazard Analysis
27	LHD	load haul dump
28	LLC	Limited Liability Corporation
29	MSHA	U.S. Mine Safety and Health Administration
30	NWP	Nuclear Waste Partnership LLC
31	<u>ROM</u>	<u>Run-of-mine</u>
32	USACE	U.S. Army Corps of Engineers
33	VOC	volatile organic compound
34	WIPP	Waste Isolation Pilot Plant
35	WPC	WIPP Panel Closure

## 1 1.4 List of Drawings

2 The following drawings were prepared as a part of the WPC design report (Attachment G1,  
3 Appendix G1-B, Drawings):

4	DWG 262-001	WIPP Panel Closure ( <b>WPC</b> ) Title Sheet
5	DWG 262-002	WPC Locations
6	DWG 262-003	Typical Panel Layout and Mined Entry Cross-Sections
7	DWG 262-004	WPC Details – Bulkhead and ROM Salt Locations
8	DWG 262-005	WPC Details – Bulkhead Front-View and Attachment Detail

## 9 1.5 Work by Others

### 10 Survey

11 All survey work to locate, control, confirm, and complete the work will be performed by NWP. All  
12 survey work for record purposes will be performed by NWP. NWP may elect to perform certain  
13 portions or all of the work. The work performed by the NWP will be defined prior to the contract.  
14 Unless otherwise agreed by NWP, the contractor shall use underground equipment furnished by  
15 NWP for construction of the steel bulkheads and placement of ROM salt. Underground mining  
16 personnel who are qualified for the operation of such underground construction equipment may  
17 be made available to the contractor. The use of NWP equipment shall be coordinated with  
18 NWP.

## 19 1.6 Contractor's Use of Site

### 20 Site Conditions

21 The WIPP site is located near Carlsbad in southeastern New Mexico, as shown on the  
22 drawings. The underground arrangements and location of the WIPP waste disposal panels are  
23 shown on the drawings. The work is to construct steel bulkheads in the air-intake drifts, air-  
24 exhaust drifts, and main access drifts between Panels 9 and 10 after cessation of the disposal  
25 phase in the specific panel. The work may include installation of steel bulkheads at alternative  
26 locations. Alternative locations will be specified by the NWP geotechnical engineer prior to  
27 installation activities. Dual bulkheads will be emplaced in the main entries north of Panel 10  
28 after cessation of all disposal activities, and ROM salt placed between these bulkheads at a  
29 length to be specified by NWP. Run-of-mine salt will also be used as part of the Panel 9 closure.  
30 The waste disposal panels are located approximately 2,150 feet (655 meters) below the ground  
31 surface. The contractor shall visit the site, and become familiar with the site and site conditions,  
32 prior to preparing a bid proposal.

### 33 Contractor's Use of Site

34 Areas at the ground surface will be designated for the contractor's use in assembling and  
35 storing ~~his~~ equipment and materials. The contractor shall utilize only those areas so designated.

36 Limited space within the underground area will be designated for the contractor's use for  
37 storage of material and setup of equipment.

## 1.7 Contractor's Use of Facilities

Existing facilities at the site available for use by the contractor are:

- Waste shaft conveyance
- Salt skip hoist
- 460-volt AC, 3-phase power
- Water (underground, at waste shaft only) (above ground, at a location designated by NWP)

Additional information on mobilization and demobilization to these facilities is presented in Section 02010.

## 1.8 Work Sequence

Work sequence shall be as shown on the drawings and as directed by NWP. NWP will designate the order in which panels are to be closed.

## 1.9 Work Plans

The contractor shall prepare work plans fully describing the proposed fabrication, installation, and construction for each WIPP panel closure. The work plan shall define proposed materials, equipment, and construction methods. The work plan shall state supporting processes, procedures, materials safety data sheets, and regulations by reference. The work plans shall address precautions related to the Job Hazards Check List. The work plan shall address limitations such as hold and witness points. The work plans shall address prerequisites for work. NWP shall approve the work plan and no work shall be performed prior to approval of the work plan.

## 1.10 Health and Safety Plan (HASP)

The contractor shall obtain, review, and agree to applicable portions of the existing WIPP Safety Manual, WP 12-1. The contractor shall prepare a project-specific HASP taking into account applicable sections of the WIPP Safety Manual. Personnel performing work shall be qualified to work underground. Personnel operating heavy construction equipment shall be qualified to operate such equipment. The contractor shall also perform a Job Hazard Analysis (JHA) in accordance with WP 12-1. NWP shall approve the HASP and JHA and no work shall be performed prior to approval of the HASP and JHA.

## 1.11 Contractor Quality Control Plan (CQCP)

The contractor shall prepare a CQCP identifying all personnel and procedures necessary to produce an end product that complies with the contract requirements. The CQCP shall comply with applicable NWP requirements, including operator training and qualification; and Section 01400, Contractor Quality Control, of this specification. NWP shall approve the CQCP and no work shall be performed prior to approval of the CQCP.







CFR	Code of Federal Regulations Government Printing Office 732 North Capital Street, NW Washington, District of Columbia 20401-0001 Ph: 202-512-1800 Fax: 202 512-2104
EPA	Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733 Ph: 214-665-2200
FTM-STD	Federal Test Method Standards Standardization Documents Order Desk, Building 4D 700 Robbins Avenue Philadelphia, Pennsylvania 19111-5094 Ph: 215-697-2179 Fax: 215-697-2978
NIST	National Institute of Standards and Technology 100 Bureau Drive, Stop 1000 Gaithersburg, Maryland 20899-1000 Ph: 301-975-6478 Fax: 301-975-8295
NTIS	National Technical Information Service U.S. Department of Commerce 5301 Shawnee Road Alexandria, Virginia 22312 Ph: 703-605-6000 Fax: 703-605-6900

1 **Part 2 – Products**

2 Not used.

3 **Part 3 – Execution**

4 Not used.

5 **\*\*\*END OF SECTION\*\*\***

6



## 1.5 Quality Assurance

The contractor shall:

- Monitor suppliers, manufacturers, products, services, site conditions, and workmanship to produce work of specified quality
- Comply with specified standards as minimum quality for the work except where more stringent tolerances, codes, or specified requirements indicate higher standards or more precise workmanship
- Perform work with qualified persons to produce required and specified quality

## 1.6 Tolerances

The contractor shall:

- Monitor excavation, fabrication, and tolerances to produce acceptable work. The contractor shall not permit tolerances to accumulate.

## 1.7 Testing Services

Unless otherwise agreed by NWP, the contractor shall employ an independent firm qualified to perform the testing services and other services specified in the individual specification sections, and as may otherwise be required by NWP. Testing and source quality control may occur on or off the project site.

The testing laboratory, if used, shall comply with applicable sections of the reference standards and shall be authorized to operate in the State of New Mexico.

Testing equipment shall be calibrated at reasonable intervals traceable either to the standards from the National Institute of Standards and Technology or to accepted values of natural physical constants.

## 1.8 Inspection Services

The contractor may employ an independent firm to perform inspection services as a supplement to the contractor's quality control as specified in the individual specification sections, and as may be required by NWP. Inspection may occur on or off the project site.

The inspection firm shall comply with applicable sections of the reference standards.

## 1.9 Submittals

The contractor shall submit a CQCP as described herein.

Prior to start of work, if a testing laboratory is used, the contractor shall submit for approval the testing laboratory name, address, telephone number, and name of responsible officer of the firm, as well as a copy of the testing laboratory compliance with the referenced American Society for Testing and Materials (**ASTM**) standards, and a copy of the report of laboratory

1 facilities inspection made by Materials Reference Laboratory of National Institute of Standards  
2 and Technology with memorandum of remedies of any deficiencies reported by the inspection.

3 The contractor shall submit the names and qualifications of personnel proposed to perform the  
4 required inspections, along with their individual qualifications and certifications. Once approved  
5 by NWP, these personnel shall be available as may be required to promptly and efficiently  
6 complete the work.

## 7 **Part 2 – Products**

8 Not used.

## 9 **Part 3 – Execution**

### 10 **3.1 General**

11 The contractor is responsible for quality control and shall establish and maintain an effective  
12 quality control system. The quality control system shall consist of plans, procedures, and  
13 organization necessary to produce an end product that complies with the contract requirements.  
14 The quality control system shall cover construction operations, both on site and off site, and  
15 shall be keyed to the proposed construction sequence. The project superintendent will be held  
16 responsible for the quality of work on the job. The project superintendent in this context is the  
17 individual with the responsibility for the overall management of the project, including quality and  
18 production.

### 19 **3.2 Contractor Quality Control Plan**

#### 20 **3.2.1 General**

21 The contractor shall supply, not later than 30 days after receipt of notice to proceed, the CQCP,  
22 which implements the requirements of the Contract. The CQCP shall identify personnel,  
23 procedures, control, instructions, tests, records, and forms to be used. Construction shall not  
24 begin until the CQCP is approved by NWP.

#### 25 **3.2.2 Content of the CQCP**

26 The CQCP shall cover construction operations, both on site and off site, including work by  
27 subcontractors, fabricators, suppliers, and purchasing agents and shall include, as a minimum,  
28 the following items:

- 29 • A description of the quality control organization, including a chart showing lines of  
30 authority and acknowledgment that the Contractor Quality Control (**CQC**) staff shall  
31 implement the control system for all aspects of the work specified.
- 32 • The name, qualifications (in resume format), duties, responsibilities, and authorities of  
33 each person assigned a CQC function.
- 34 • A description of CQCP responsibilities and a delegation of authority to adequately  
35 perform the functions described in the CQCP, including authority to stop work.

- 1       • Procedures for scheduling, reviewing, certifying, and managing submittals, including  
2       those of subcontractors, off-site fabricators, suppliers, and purchasing agents. These  
3       procedures shall be in accordance with NWP submittal procedures.
  
- 4       • Control, verification, and acceptance testing procedures as may be necessary to ensure  
5       that the work is completed to the requirements of the drawings and specifications.
  
- 6       • Procedures for tracking deficiencies from identification, through acceptable corrective  
7       action, to verification that identified deficiencies have been corrected.
  
- 8       • Reporting procedures, including proposed reporting formulas.

### 9       **3.2.3     Acceptance of Plan**

10      Acceptance of the contractor's plan is conditional. NWP reserves the right to require the  
11      contractor to make changes in the CQCP and operations, including removal of personnel, if  
12      necessary, to obtain the quality specified.

### 13      **3.2.4     Notification of Changes**

14      After acceptance of the CQCP, the contractor shall notify NWP in writing of any proposed  
15      change. Proposed changes are subject to acceptance by NWP.

## 16      **3.3        Tests**

### 17      **3.3.1     Testing Procedure**

18      The contractor shall perform specified or required tests to verify that control measures are  
19      adequate to complete the work to contract requirements. Upon request, the contractor shall  
20      furnish, at the contractor's own expense, duplicate samples of test specimens for testing by  
21      NWP. The contractor shall perform, as necessary, the following activities and permanently  
22      record the results:

- 23      • Verify that testing procedures comply with contract requirements.
  
- 24      • Verify that facilities and testing equipment are available and comply with testing  
25      standards.
  
- 26      • Check test instrument calibration data against certified standards.
  
- 27      • Verify that recording forms and test identification control number system, including the  
28      test documentation requirements, have been prepared.
  
- 29      • Record the results of tests taken, both passing and failing. Specification paragraph  
30      reference, location where tests were taken, and the sequential control number identifying  
31      the test will be given. If approved by NWP, actual test reports may be submitted later  
32      with a reference to the test number and date taken. An information copy of tests  
33      performed by an offsite or commercial test facility will be provided directly to NWP.

- The contractor may elect to develop an equipment specification with construction parameters based upon test results of a test section of ROM salt. The equipment specification based upon construction parameters shall be traceable to standard test results identified in the CQCP. Specification paragraph reference, location where construction parameters were taken, and the sequential control number identifying the construction parameters will be given. If approved by NWP, actual construction parameter reports may be submitted later with a reference to the recording of construction parameters, location, time, and date taken.

### **3.4 Testing Laboratory**

The testing laboratory, if used, shall provide qualified personnel to perform specified sampling and testing of products in accordance with specified standards, and the requirements of contract documents.

Reports indicating results of tests, and compliance or noncompliance with the contract documents will be submitted in accordance with NWP submittal procedures. Testing by an independent firm does not relieve the contractor of the responsibility to perform the work to the contract requirements.

### **3.5 Inspection Services**

The inspection firm shall provide qualified personnel to perform specified inspection of products in accordance with specified standards.

Reports indicating results of the inspection and compliance or noncompliance with the contract documents will be submitted in accordance with NWP submittal procedures.

Inspection by the independent firm does not relieve the contractor of the responsibility to perform the work to the contract requirements.

### **3.6 Completion Inspection**

#### **3.6.1 Pre-Final Inspection**

At appropriate times and at the completion of the work, the contractor shall conduct an inspection of the work and develop a "punch list" of items that do not conform to the drawings and specifications. The contractor shall then notify NWP that the work is ready for inspection. NWP will perform this inspection to verify that the work is satisfactory and appropriately complete. A "final punch list" will be developed as a result of this inspection. The contractor shall ensure that the items on this list are corrected and notify NWP so that a final inspection can be scheduled. Any items noted on the final inspection shall be corrected in a timely manner. These inspections and any deficiency corrections required by this paragraph will be accomplished within the time slated for completion of the entire work.

#### **3.6.2 Final Acceptance Inspection**

The final acceptance inspection will be formally scheduled by NWP based upon notice from the contractor. This notice will be given to NWP at least 14 days prior to the final acceptance inspection. The contractor shall assure that the specific items previously identified as



1 unacceptable, along with the remaining work performed under the contract, will be complete and  
2 acceptable by the date scheduled for the final acceptance inspection.

### 3 **3.7 Documentation**

4 The contractor shall maintain current records providing factual evidence that required quality  
5 control activities and/or tests have been performed. These records shall include the work of  
6 subcontractors and suppliers and shall be on an acceptable form approved by NWP.

### 7 **3.8 Notification of Noncompliance**

8 NWP will notify the contractor of any noncompliance with the foregoing requirements. The  
9 contractor shall take immediate corrective action after receipt of such notice. Such notice, when  
10 delivered to the contractor at the worksite, shall be deemed sufficient for the purpose of  
11 notification. If the contractor fails or refuses to comply promptly, NWP may issue an order  
12 stopping all or part of the work until satisfactory corrective action has been taken. No part of the  
13 time lost due to such stop orders shall be made the subject of claim for extension of time or for  
14 excess costs or damages by the contractor.

15 **\*\*\*END OF SECTION\*\*\***

16

## Section 01600 – Material and Equipment

### Part 1 – General

#### 1.1 Scope

This section includes the following:

- Equipment
- Products
- Transportation and Handling
- Storage and Protection
- Substitutions

#### 1.2 Related Sections

- 01010 – Summary of Work
- 01400 – Contractor Quality Control
- 02010 – Mobilization and Demobilization
- 02222 – Excavation
- 03100 – Run-of-Mine Salt

#### 1.3 Equipment

The contractor shall specify proposed equipment in the work plan. Power equipment for use underground shall be either electrical or diesel-engine driven. All diesel-engine equipment shall be certified for use underground at the Waste Isolation Pilot Plant (**WIPP**) site.

#### 1.4 Products

The contractor shall specify in the work plan, or in subsequently required submittals, the proposed products including, but not limited to steel bulkheads and run-of-mine (**ROM**) salt. The proposed products shall be supported by laboratory test results as required by the specifications. Products shall be subject to approval by Nuclear Waste Partnership LLC (**NWP**).

#### 1.5 Transportation and Handling

The contractor shall:

- Transport and handle products in accordance with manufacturer's instructions.
- Promptly inspect shipments to ensure that products comply with requirements, quantities are correct, and products are undamaged.
- Provide equipment and personnel to handle products by methods to prevent soiling, disfigurement, or damage.



1

2

## DIVISION 2 – SITE WORK

3

## Section 02010 – Mobilization and Demobilization

### Part 1 – General

#### 1.1 Scope

This section includes the following:

- Mobilization of Equipment and Facilities to Site
- Use of Site
- Use of Existing Facilities
- Demobilization of Equipment and Facilities
- Site Cleanup

#### 1.2 Related Sections

- 01010 – Summary of Work
- 01600 – Material and Equipment

### Part 2 – Products

Not used.

### Part 3 – Execution

#### 3.1 Mobilization of Equipment and Facilities to Site

Upon authorization to proceed, the contractor shall mobilize the contractor's equipment and facilities to the jobsite. Equipment and facilities shall be as specified and as defined in the contractor's work plan.

Nuclear Waste Partnership LLC (**NWP**) will provide utilities at designated locations. The contractor shall be responsible for hookups and tie-ins required for contractor operations.

The contractor shall be responsible for providing ~~its~~ own office, storage, and sanitary facilities.

Areas will be designated for the contractor's use in the underground area near the Waste Isolation Pilot Plant (**WIPP**) Panel Closure (**WPC**) installation. These areas are limited.

#### 3.2 Use of Site

The contractor shall use only those areas specifically designated for use by NWP. The contractor shall limit on-site travel to the specific routes required for performance of work, and designated by NWP.

### 3.3 Use of Existing Facilities

Existing facilities available for use by the contractor are as follows:

- Waste shaft conveyance
- Salt skip hoist
- 460-volt AC, 3-phase power
- Water underground at waste shaft only
- Water on surface at location designated by NWP

The contractor shall arrange for use of the facilities with NWP and coordinate contractor actions and requirements with ongoing NWP operations.

Use of water in the underground will be restricted. No washout or cleanup will be permitted in the underground except as designated by NWP. Aboveground washout or cleanup of equipment will be allowed in the areas designated by NWP.

The contractor is cautioned to be aware of the physical dimensions of the waste conveyance and the air lock.

The contractor shall be responsible for any damage incurred by the existing site facilities as a result of contractor operations. Any damage shall be reported immediately to NWP and repaired at the contractor's cost.

### 3.4 Demobilization of Equipment and Facilities

At completion of work, the contractor shall demobilize contractor equipment and facilities from the job site. Contractor's equipment and materials shall be removed and disturbed areas restored. Utilities shall be removed to their connection points unless otherwise directed by NWP. Any equipment that becomes radiologically contaminated will be managed in accordance with NWP radiological protection policies.

### 3.5 Site Cleanup

At conclusion of the work, the contractor shall remove trash, waste, debris, excess construction materials, and restore the affected areas to their prior condition, to the satisfaction of NWP. A final inspection will be conducted by NWP and the contractor before final payment is approved. Any trash, waste, debris, excess construction materials that become radiologically contaminated will be managed in accordance with NWP radiological protection policies.

\*\*\*END OF SECTION\*\*\*

1 **Section 02222 – Excavation**

2 **Part 1 – General**

3 **1.1 Scope**

4 This section includes the following:

- 5 • Excavation for Surface Preparation and Leveling of Areas for Steel Bulkhead and ROM  
6 Salt Placement
- 7 • Disposing of Excavated Materials
- 8 • Field Measurements and Survey

9 **1.2 Related Sections**

- 10 • 01010 – Summary of Work
- 11 • 01600 – Material and Equipment

12 **1.3 Reference Documents**

13 Krieg, R.D., 1984. Reference Stratigraphy and Rock Properties for the Waste Isolation Pilot  
14 Plant, SAND83-1908, Sandia National Laboratories, Albuquerque, New Mexico.

15 **1.4 Field Measurements and Survey**

16 Survey required for performance of the work will be provided by Nuclear Waste Partnership LLC  
17 (NWP).

18 **Part 2 – Products**

19 Not used.

20 **Part 3 – Execution**

21 **3.1 Excavation for Surface Preparation and Leveling of Areas for Steel Bulkhead and**  
22 **ROM Salt Placement**

23 The contractor shall inspect the areas designated for placement of the Waste Isolation Pilot  
24 Plant (WIPP) Panel Closure (WPC) components (run-of-mine (ROM) salt and steel bulkheads)  
25 and remove any loose material. If loose material is found, the contractor shall excavate and  
26 prepare the surface by removing loose material and cleaning rock surfaces. The surface  
27 preparation of the floor shall produce a surface suitable for anchoring the steel bulkhead base  
28 components and for placing the first layer of ROM salt (as applicable). Excavation may be  
29 performed by either mechanical or manual means. Use of explosives is prohibited.





1

2

### **DIVISION 3 – WPC COMPONENTS**

3

## SECTION 03100 – Run-of-Mine Salt

### Part 1 – General

#### 1.1 Scope

This section includes the following:

- Salt Placement

#### 1.2 Related Sections

- 01010 – Summary of Work
- 01400 – Contractor Quality Control
- 01600 – Material and Equipment

#### 1.3 Submittals for Review and Approval

The salt emplacement method, dust control plan and other safety-related material shall be approved by Nuclear Waste Partnership LLC (**NWP**).

#### 1.4 Quality Assurance

The contractor shall perform the work in accordance with the Contractor Quality Control Plan (**CQCP**).

### Part 2 – Products

#### 2.1 Salt Material

The salt is run-of-mine (**ROM**) salt and requires no grading or compaction. The salt shall be free of foreign organic material.

### Part 3 – Execution

#### 3.1 General

The contractor shall furnish labor, material, equipment, and tools to handle and place the salt.

The contractor shall use underground equipment and underground mine personnel as required in Part 1.5, Work by Others in Section 01010, Summary of Work. NWP will supply ROM salt. The contractor shall make suitable arrangements for transporting and placing the ROM salt.

#### 3.2 Installation

Run-of-mine salt shall be transported to the Waste Isolation Pilot Plant (**WIPP**) Panel Closure (**WPC**)-An installation area north of Panel 9 prior to installation of the outbye bulkhead and to the WPC-B installation area north of Panel 10 after the construction of the in-bye steel bulkhead. Run-of-mine salt from any underground excavation is useable as long as it is free of foreign organic matter. The ROM salt is not required to achieve a specified density.

1 Salt may be emplaced in layers to facilitate the construction. The ROM salt is emplaced in  
2 layers to achieve minimum lengths shown in Table 1. The lengths reported in Table 1 do not  
3 include sloped ends of the ROM salt plug. Extents of the ROM salt emplacement are designated  
4 in the drawings.

5 There shall be no gap left between ROM salt and roof or sidewalls. Hand placement or push  
6 plates can be used to fill the voids if necessary. The approximate lengths and slope inclines are  
7 specified in the drawings. Emplacement of the ROM salt at natural angle of repose is  
8 acceptable.

9 **Table 1 Minimum ROM Salt Lengths**

Entry Width (feet)	Minimum ROM Salt Length <sup>1</sup> (feet)
14	35
16	40
20	50
25	65

Note:

1. Reported ROM length dimensions do not include end slopes of the ROM salt plug.

### 10 **3.3 Field Quality Control**

11 The contractor shall provide a Quality Control Inspector to inspect the emplacement of salt.

12 \*\*\*END OF SECTION\*\*\*

13



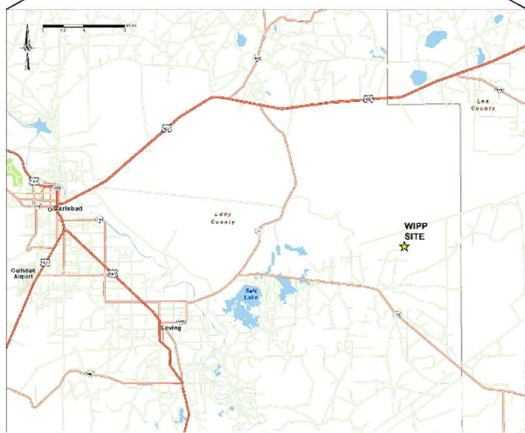


**ATTACHMENT G1  
APPENDIX G1-B**

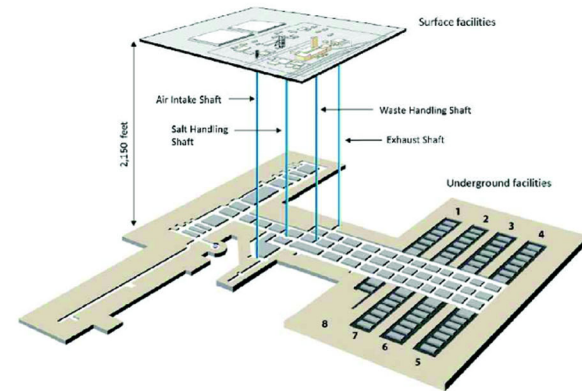
**DRAWINGS**

**WIPP PANEL CLOSURE  
WASTE ISOLATION PILOT PLANT  
CARLSBAD, NEW MEXICO**

## WIPP PANEL CLOSURE CARLSBAD, NEW MEXICO



INDEX OF DRAWINGS	
DRAWING NO.	TITLE
262-001	WIPP PANEL CLOSURE (WPC) TITLE SHEET
262-002	WPC LOCATIONS
262-003	TYPICAL PANEL LAYOUT AND MINED ENTRY CROSS-SECTIONS
262-004	WPC DETAILS - BULKHEAD AND ROM SALT LOCATIONS
262-005	WPC DETAILS - BULKHEAD FRONT-VIEW AND ATTACHMENT DETAIL



P:\061911\WIPP\WIPP\_CLOSURE\DWG\262-001.dwg  
 2018-07-18 ISSUED FOR CLIENT REVIEW  
 REV. YYY-MM-DD DESCRIPTION  
 GG KJC WTTWTT  
 DESIGNED PREPARED REVIEWED APPROVED

CLIENT  
 NUCLEAR WASTE PARTNERSHIP LLC



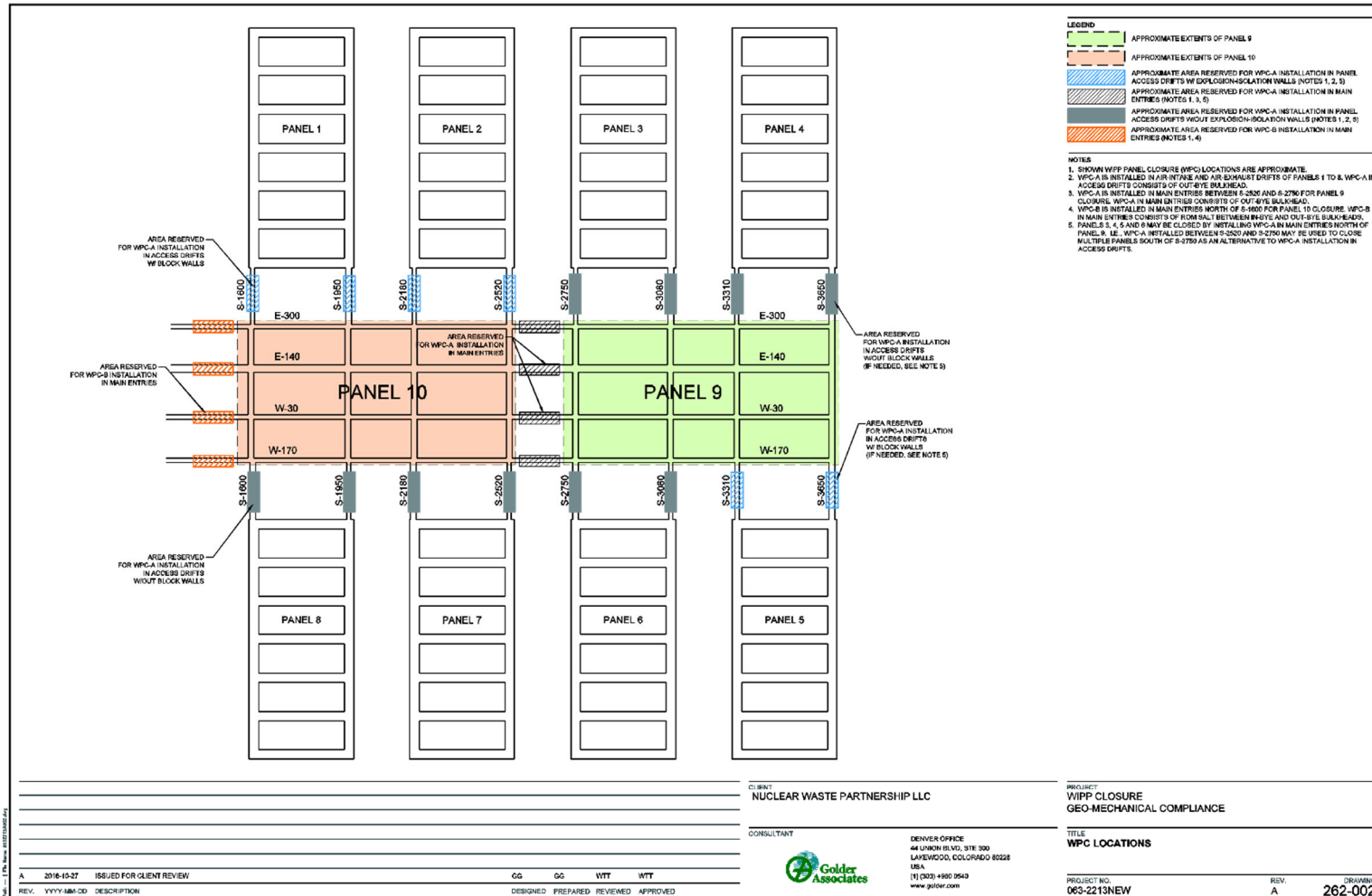
DENVER OFFICE  
 44 UNION BLVD, STE 300  
 LAKEWOOD, COLORADO 80228  
 USA  
 [1] (303) 980 0640  
 www.golder.com

PROJECT  
 WIPP CLOSURE  
 GEO-MECHANICAL COMPLIANCE

TITLE  
 WIPP PANEL CLOSURE (WPC) TITLE SHEET

PROJECT NO. 063-2213NEW  
 REV. A  
 DRAWING 262-001

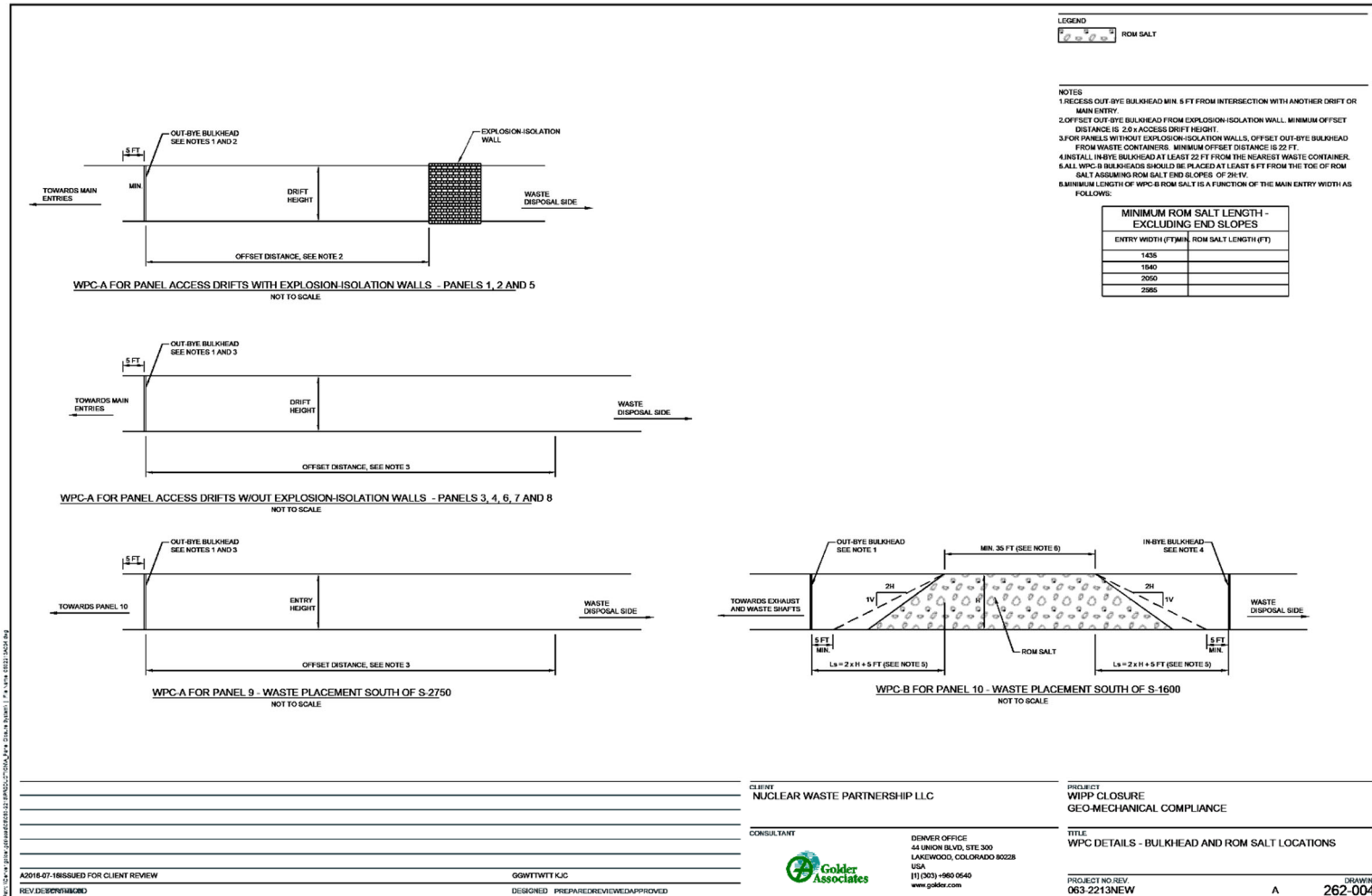
Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G1, Appendix G1-B  
~~September 2018~~ December 2022 Renewal Draft Permit







Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G1, Appendix G1-B  
~~September 2018~~ December 2022 Renewal Draft Permit





**ATTACHMENT G2**

**WASTE ISOLATION PILOT PLANT  
SHAFT SEALING SYSTEM COMPLIANCE  
SUBMITTAL DESIGN REPORT**

## **ATTACHMENT G2**

### **WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT**

#### **ADAPTED FROM:**

**SAND96-1326/1  
DISTRIBUTION UNLIMITED  
RELEASE CATEGORY UC-721  
PRINTED AUGUST 1996**

### **WASTE ISOLATION PILOT PLANT SHAFT SEALING SYSTEM COMPLIANCE SUBMITTAL DESIGN REPORT**

#### **VOLUME 1 OF 2: MAIN REPORT APPENDICES A AND B**

**REPOSITORY ISOLATION SYSTEMS DEPARTMENT  
SANDIA NATIONAL LABORATORIES  
ALBUQUERQUE, NM 87185**

#### **Abstract**

This report describes a shaft sealing system design for the Waste Isolation Pilot Plant (WIPP), a proposed nuclear waste repository in bedded salt. The system is designed to limit entry of water and release of contaminants through the four existing shafts after the WIPP is decommissioned. The design approach applies redundancy to functional elements and specifies multiple, common, low-permeability materials to reduce uncertainty in performance. The system comprises 13 elements that completely fill the shafts with engineered materials possessing high density and low permeability. Laboratory and field measurements of component properties and performance provide the basis for the design and related evaluations. Hydrologic, mechanical, thermal, and physical features of the system are evaluated in a series of calculations. These evaluations indicate that the design guidance is addressed by effectively limiting transport of fluids within the shafts, thereby limiting transport of hazardous material to regulatory boundaries. Additionally, the use or adaptation of existing technologies for placement of the seal components combined with the use of available, common materials assure that the design can be constructed.

This report was modified to make it a part of the RCRA Facility Permit issued by the New Mexico Environment Department (NMED). The modifications included removal of Appendices C and D from the original document. Although they were important to demonstrate compliance with the performance standards in the hazardous waste regulations, they do not provide plans or procedures that will be implemented under the authority of the Permit. Appendices A, B and E are retained as Attachments to the Permit (Attachments G2-A, G2-B and G2-E). The Figures

in this report, which were interspersed in the text in the original document, have been moved to a common section following the References.

## Acknowledgments

The work presented in this document represents the combined effort of a number of individuals at Sandia National Laboratories, Parsons Brinckerhoff (under contract AG-4909), INTERA (under contract AG-4910), RE/SPEC (under contract AG-4911), and Tech Reps. The Sandian responsible for the preparation of each section of the report and the lead individual(s) at firms under contract to Sandia that provided technical expertise are recognized below.

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T. P. Peterson and S. B. Kmetz, Tech Reps, served as technical editors of this document.

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\* Appendices C and D are not included in the facility Permit.

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## ACRONYMS

1		
2	AIS	Air Intake Shaft
3	AMM	asphalt mastic mix
4	CFR	Code of Federal Regulations
5	DOE	Department of Energy
6	DRZ	disturbed rock zone
7	EPA	Environmental Protection Agency
8	HMAC	hot mix asphalt concrete
9	MDCF	Multimechanism Deformation Coupled Fracture
10	MD	Munson-Dawson
11	NMED	New Mexico Environment Department
12	NMVP	No Migration Variance Petition
13	PA	performance assessment
14	PTM	Plug Test Matrix
15	QA	quality assurance
16	SMC	Salado Mass Concrete
17	SPVD	Site Preliminary Design Validation
18	SSSPT	Small Scale Seal Performance Test
19	SWCF	Sandia WIPP Central Files
20	TRU	transuranic
21	WIPP	Waste Isolation Pilot Plant

## 1 **Executive Summary**

## 2 **Introduction**

3 This report documents a shaft seal system design developed as part of a submittal to the  
4 Environmental Protection Agency (**EPA**) and the New Mexico Environment Department (**NMED**)  
5 that will demonstrate regulatory compliance of the Waste Isolation Pilot Plant (**WIPP**) for  
6 disposal of transuranic waste. The shaft seal system limits entry of water into the repository and  
7 restricts the release of contaminants. Shaft seals address fluid transport paths through the  
8 opening itself, along the interface between the seal material and the host rock, and within the  
9 disturbed rock surrounding the opening. The entire shaft seal system is described in this Permit  
10 Attachment and its three appendices, which include seal material specifications, construction  
11 methods, rock mechanics analyses, fluid flow evaluations, and the design drawings. The design  
12 represents a culmination of several years of effort that has most recently focused on providing  
13 to the EPA and NMED a viable shaft seal system design. Sections of this report and the  
14 appendices explore function and performance of the WIPP shaft seal system and provide well  
15 documented assurance that such a shaft seal system could be constructed using available  
16 materials and methods. The purpose of the shaft seal system is to limit fluid flow within four  
17 existing shafts after the repository is decommissioned. Such a seal system would not be  
18 implemented for several decades, but to establish that regulatory compliance can be achieved  
19 at that future date, a shaft seal system has been designed that exhibits excellent durability and  
20 performance and is constructable using existing technology. The design approach is  
21 conservative, applying redundancy to functional elements and specifying various common, low-  
22 permeability materials to reduce uncertainty in performance. It is recognized that changes in the  
23 design described here will occur before construction and that this design is not the only possible  
24 combination of materials and construction strategies that would adequately limit fluid flow within  
25 the shafts.

## 26 **Site Setting**

27 One of the U.S. Department of Energy's (**DOE's**) site selection criteria is a favorable geologic  
28 setting which minimizes fluid flow as a transport mechanism. Groundwater hydrology in the  
29 proximity of the WIPP site is characterized by geologic strata with low transmissivity and low  
30 hydrologic gradients, both very positive features with regard to sealing shafts. For purposes of  
31 performance evaluations, hydrological analyses divide lithologies and requirements into the  
32 Rustler Formation (and overlying strata) and the Salado Formation, comprised mostly of salt.  
33 The principal design concern is fluid transport phenomena of seal materials and lithologies  
34 within the Salado Formation. The rock mechanics setting is an important consideration in terms  
35 of system performance. Rock properties affect hydrologic response of the shaft seal system.  
36 The stratigraphic section contains lithologies that exhibit brittle and ductile behavior. A zone of  
37 rock around the shafts is disturbed owing to the creation of the opening. The disturbed rock  
38 zone (**DRZ**) is an important design consideration because it possesses higher permeability than  
39 intact rock. Host rock response and its potential to fracture, flow, and heal around WIPP shaft  
40 openings are relevant to the performance of the shaft seal system.

## 41 **Design Guidance**

42 Use of both engineered and natural barriers to isolate wastes from the accessible environment  
43 is required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR  
44 §191.14(d). The use of engineered barriers to prevent or substantially delay movement of water,

1 hazardous constituents, or radionuclides toward the accessible environment is required by  
2 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR §194.44.  
3 Hazardous constituent release performance standards are specified in Permit Part 5 and  
4 20.4.1.500 NMAC (incorporating 40 CFR §§264.111(b), 264.601(a), and 264 Subpart F).  
5 Radionuclide release limits are specified in 40 CFR §191 for the entire repository system (EPA,  
6 1996a; 1996b). Design guidance for the shaft seal system addresses the need for the WIPP to  
7 comply with system requirements and to follow accepted engineering practices using  
8 demonstrated technology. Design guidance is categorized below:

- 9 • limit hazardous constituents reaching regulatory boundaries,
- 10 • restrict groundwater flow through the sealing system,
- 11 • use materials possessing mechanical and chemical compatibility,
- 12 • protect against structural failure of system components,
- 13 • limit subsidence and prevent accidental entry, and
- 14 • utilize available construction methods and materials.

15 Discussions of the design presented in the text of this report and the details presented in the  
16 appendices respond to these qualitative design guidelines. The shaft seal system design was  
17 completed under a Quality Assurance program that includes review by independent, qualified  
18 experts to assure the best possible information is provided to the DOE on selection of  
19 engineered barriers (40 CFR §194.27). Technical reviewers examined the complete design  
20 including conceptual, mathematical, and numerical models and computer codes (40 CFR  
21 §194.26). The design reduces the impact of uncertainty associated with any particular element  
22 by using multiple sealing system components and by using components constructed from  
23 different materials.

## 24 Design Description

25 The shaft sealing system comprises 13 elements that completely fill the shaft with engineered  
26 materials possessing high density and low permeability. Salado Formation components provide  
27 the primary regulatory barrier by limiting fluid transport along the shaft during and beyond the  
28 10,000-year regulatory period. Components within the Rustler Formation limit commingling  
29 between brine-bearing members, as required by state regulations. Components from the Rustler  
30 to the surface fill the shaft with common materials of high density, consistent with good  
31 engineering practice. A synopsis of each component is given below.

32 **Shaft Station Monolith.** At the bottom of each shaft a salt-saturated concrete monolith  
33 supports the local roof. A salt-saturated concrete, called Salado Mass Concrete (**SMC**), is  
34 specified and is placed using a conventional slickline construction procedure where the concrete  
35 is batched at the surface. SMC has been tailored to match site conditions. The salt-handling  
36 shaft and the waste-handling shaft have sumps which also will be filled with salt-saturated  
37 concrete as part of the monolith.

38 **Clay Columns.** A sodium bentonite is used for three compacted clay components in the Salado  
39 and Rustler Formations. Although alternative construction specifications are viable, labor-  
40 intensive placement of compressed blocks is specified because of proven performance. Clay  
41 columns effectively limit brine movement from the time they are placed to beyond the  
42 10,000-year regulatory period. Stiffness of the clay is sufficient to promote healing of fractures in  
43 the surrounding rock salt near the bottom of the shafts, thus removing the proximal DRZ as a

1 potential pathway. The Rustler clay column limits brine communication between the Magenta  
2 and Culebra Members of the Rustler Formation.

3 **Concrete-Asphalt Waterstop Components.** Concrete-asphalt waterstop components  
4 comprise three elements: an upper concrete plug, a central asphalt waterstop, and a lower  
5 concrete plug. Three such components are located within the Salado Formation. These  
6 concrete-asphalt waterstop components provide independent shaft cross-section and DRZ  
7 seals that limit fluid transport, either downward or upward. Concrete fills irregularities in the shaft  
8 wall, while use of the salt-saturated concrete assures good bonding with salt. Salt creep against  
9 the rigid concrete components establishes a compressive stress state and promotes early  
10 healing of the salt DRZ surrounding the concrete plugs. The asphalt intersects the shaft cross  
11 section and the DRZ.

12 **Compacted Salt Column.** Each shaft seal includes a column of compacted WIPP salt with 1.5  
13 percent weight water added to the natural material. Construction demonstrations have shown  
14 that mine-run WIPP salt can be dynamically compacted to a density equivalent to approximately  
15 90% of the average density of intact Salado salt. The remaining void space is removed through  
16 consolidation caused by creep closure. The salt column becomes less permeable as density  
17 increases. The location of the compacted salt column near the bottom of the shaft assures the  
18 fastest achievable consolidation of the compacted salt column after closure of the repository.  
19 Analyses indicate that the salt column becomes an effective long-term barrier in under 100  
20 years.

21 **Asphalt Column.** An asphalt-aggregate mixture is specified for the asphalt column, which  
22 bridges the Rustler/Salado contact and provides a seal essentially impermeable to brine for the  
23 shaft cross-section and the shaft wall interface. All asphalt is placed with a heated slickline.

24 **Concrete Plugs.** A concrete plug is located just above the asphalt column and keyed into the  
25 surrounding rock. Mass concrete is separated from the cooling asphalt column with a layer of  
26 fibercrete, which permits work to begin on the overlying clay column before the asphalt has  
27 completely cooled. Another concrete plug is located near the surface, extending downward from  
28 the top of the Dewey Lake Redbeds.

29 **Earthen Fill.** The upper shaft is filled with locally available earthen fill. Most of the fill is  
30 dynamically compacted (the same method used to construct the salt column) to a density  
31 approximating the surrounding lithologies. The uppermost earthen fill is compacted with a  
32 sheepsfoot roller or vibratory plate compactor.

### 33 **Structural Analysis**

34 Structural issues pertaining to the shaft seal system have been evaluated. Mechanical, thermal,  
35 physical, and hydrological features of the system are included in a broad suite of structural  
36 calculations. Conventional structural mechanics applications would normally calculate load on  
37 system elements and compare the loads to failure criteria. Several such conventional  
38 calculations have been performed and show that the seal elements exist in a favorable,  
39 compressive stress state that is low in comparison to the strength of the seal materials. Thermal  
40 analyses have been performed to examine the effects of concrete heat of hydration and heat  
41 transfer for asphalt elements. Coupling between damaged rock and fluid flow and between the  
42 density and permeability of the consolidating salt column is evaluated within the scope of  
43 structural calculations. The appendices provide descriptions of various structural calculations



1 conducted as part of the design study. The purpose of each calculation varies; however, the  
2 calculations generally address one or more of the following concerns: (1) stability of the  
3 component, (2) influences of the component on hydrological properties of the seal and  
4 surrounding rock, or (3) construction methods. Stability calculations address:

- 5 • potential for thermal cracking of concrete;
- 6 • structural loads on seal components resulting from salt creep, gravity, swelling clay,  
7 dynamic compaction, or possible repository-generated gas pressures.

8 Structural calculations defining input conditions to hydrological calculations include:

- 9 • spatial extent of the DRZ within the Salado Formation salt beds as a function of depth,  
10 time, and seal material;
- 11 • fracturing and DRZ development within Salado Formation interbeds;
- 12 • shaft-closure induced consolidation of compacted salt columns; and
- 13 • impact of pore pressures on salt consolidation.

14 Construction analyses examine:

- 15 • placement and structural performance of asphalt waterstops, and
- 16 • potential subsidence reduction through backfilling the shaft station areas.

17 Structural calculations model shaft features including representation of the host rock and its  
18 damaged zone as well as the seal materials themselves. Two important structural calculations  
19 discussed below are unique to shaft seal applications.

20 **DRZ Behavior.** The development and subsequent healing of a DRZ that forms in the rock mass  
21 surrounding the WIPP shafts is a significant concern in the seal design. It is well known that a  
22 DRZ will develop in rock salt adjacent to the shaft upon excavation. Placement of rigid  
23 components in the shaft promotes healing within the salt DRZ as seal elements restrain inward  
24 creep and reduce the stress difference. Two computer models to calculate development and  
25 extent of the salt DRZ are used. The first model uses a ratio of stress invariants to predict  
26 fracture; the second approach uses a damage stress criterion. The temporal and spatial extent  
27 of the DRZ along the entire shaft length is evaluated. Several analyses are performed to  
28 examine DRZ behavior of the rock salt surrounding the shaft. The time-dependent DRZ  
29 development and subsequent healing in the Salado salt surrounding each of the four seal  
30 materials are considered. All seal materials below a depth of about 300 m provide sufficient  
31 rigidity to heal the DRZ, a phenomenon that occurs quickly around rigid components near the  
32 shaft bottom. An extensive calculation is made of construction effects on the DRZ during  
33 placement of the asphalt-concrete waterstops. The time-dependent development of the DRZ  
34 within anhydrite and polyhalite interbeds of the Salado Formation is calculated. For all interbeds,  
35 the factor of safety against shear or tensile fracturing increases with depth into the rock  
36 surrounding the shaft wall. These results indicate that a continuous DRZ will not develop in  
37 nonsalt Salado rocks. Rock mechanics analysis also determines which of the near surface



1 lithologies fracture in the proximity of the shaft. Results from these rock mechanics analyses are  
2 used as input conditions for the fluid-flow analyses.

3 **Compacted Salt Behavior.** Unique application of crushed salt as a seal component required  
4 development of a constitutive model for salt reconsolidation. The model developed includes a  
5 nonlinear elastic component and a creep consolidation component. The nonlinear elastic  
6 modulus is density-dependent, based on laboratory test data performed on WIPP crushed salt.  
7 Creep consolidation behavior of crushed salt is based on three candidate models whose  
8 parameters are obtained from model fitting to hydrostatic and shear consolidation test data  
9 gathered for WIPP crushed salt. The model for consolidating crushed salt is used to predict  
10 permeability of the salt column. The seal system prevents fluid transport to the consolidating salt  
11 column to ensure that pore pressure does not unacceptably inhibit the reconsolidation process.  
12 Calculations made to estimate fractional density of the crushed salt seal as a function of time,  
13 depth, and pore pressure show consolidation time increases as pore pressure increases, as  
14 expected. At a constant pore pressure of one atmosphere, compacted salt will increase from its  
15 initial fractional density of 90% to 96% within 40, 80, and 120 years after placement at the  
16 bottom, middle, and top of the salt component, respectively. At a fractional density of 96%, the  
17 permeability of reconsolidating salt is approximately  $10^{-18}$  m<sup>2</sup>. A pore pressure of 2 MPa  
18 increases times required to achieve a fractional density of 96% to 92 years, 205 years, and 560  
19 years at the bottom, middle, and top of the crushed salt column, respectively. A pore pressure of  
20 4 MPa would effectively prevent reconsolidation of the crushed salt within 1,000 years. Fluid  
21 flow calculations show only minimal transport of fluids to the salt column, so pore pressure  
22 equilibrium in the consolidating salt does not occur before low permeabilities ( $\sim 10^{-18}$  m<sup>2</sup>) are  
23 achieved.

## 24 **Hydrologic Evaluations**

25 The ability of the shaft seal system to satisfy design guidance is determined by the performance  
26 of the actual seal components within the physical setting in which they are constructed.  
27 Important elements of the physical setting are hydraulic gradients of the region, properties of the  
28 lithologic units surrounding a given seal component, and potential gas generation within the  
29 repository. Hydrologic evaluations focus on processes that could result in fluid flow through the  
30 shaft seal system and the ability of the seal system to limit any such flow. Transport of  
31 radiological or hazardous constituents will be limited if the carrier fluids are similarly limited.  
32 Physical processes that could impact seal system performance have been incorporated into four  
33 models. These models evaluate: (1) downward migration of groundwater from the Rustler  
34 Formation, (2) gas migration and reconsolidation of the crushed salt seal component, (3)  
35 upward migration of brines from the repository, and (4) flow between water-bearing zones in the  
36 Rustler Formation.

37 **Downward Migration of Rustler Groundwater.** The shaft seal system is designed to limit  
38 groundwater flowing into and through the shaft sealing system. The principal source of  
39 groundwater to the seal system is the Culebra Member of the Rustler Formation. No significant  
40 sources of groundwater exist within the Salado Formation; however, brine seepage has been  
41 noted at a number of the marker beds and is included in the models. Downward migration of  
42 Rustler groundwater is limited to ensure that liquid saturation of the compacted salt column  
43 does not impact the consolidation process and to limit quantities of brine reaching the repository  
44 horizon. Consolidation of the compacted salt column will be most rapid immediately following  
45 seal construction. Simulations conducted for the 200-year period following closure demonstrate  
46 that, during this initial period, downward migration of Rustler groundwater is insufficient to

1 impact the consolidation process. Rock mechanics analyses show that this period encompasses  
2 the reconsolidation process. Lateral migration of brine through the marker beds is quantified in  
3 the analysis and shown to be inconsequential. At steady-state, the flow rate is most dependent  
4 on permeability of the system. Potential flow paths within the seal system consist of the seal  
5 material, an interface with the surrounding rock, and the host rock DRZ. Low permeability is  
6 specified for the engineered materials, and construction methods ensure a tight interface. Thus  
7 the flow path most likely to impact performance is the DRZ. Effects of the DRZ and sensitivity of  
8 the seal system performance to both engineered and host rock barriers show that the DRZ is  
9 successfully mitigated by the proposed design.

10 **Gas Migration and Salt Column Consolidation.** A multi-phase flow model of the lower seal  
11 system evaluates the performance of components extending from the middle concrete-asphalt  
12 waterstop located at the top of the salt column to the repository horizon for 200 years following  
13 closure. During this time period, the principal fluid sources to the model consist of potential gas  
14 generated by the waste and lateral brine migration within the Salado Formation. The predicted  
15 downward migration of a small quantity of Rustler groundwater (discussed above) is included in  
16 this analysis. Effects of gas generation are evaluated for three different repository  
17 repressurization scenarios, which simulate pressures as high as 14 MPa. Model results predict  
18 that high repository pressures do not produce appreciable differences in the volume of gas  
19 migration over the 200-year simulation period. Relatively low gas flow is a result of the low  
20 permeability and rapid healing of the DRZ around the lower concrete-asphalt waterstop.

21 **Upward Migration of Brine.** The Salado Formation is overpressurized with respect to the  
22 measured heads in the Rustler, and upward migration of contaminated brines could occur  
23 through an inadequately sealed shaft. Results from the model discussed above demonstrate  
24 that the crushed salt seal will reconsolidate to a very low permeability within 100 years following  
25 repository closure. Structural results show that the DRZ surrounding the long-term clay and  
26 crushed salt seal components will completely heal within the first several decades. Model  
27 calculations predict that very little brine flows from the repository to the Rustler/Salado contact.

28 **Intra-Rustler Flow.** Based on head differences between the various members of the Rustler  
29 Formation, nonhydrostatic conditions exist within the Rustler Formation. Therefore, the potential  
30 exists for vertical flow within water-bearing strata within the Rustler. The two units with the  
31 greatest transmissivity within the Rustler are the Culebra and the Magenta dolomites, which  
32 have the greatest potential for interflow. The relatively low undisturbed permeabilities of the  
33 mudstone and anhydrite units separating the Culebra and the Magenta naturally limit crossflow.  
34 However, the construction and subsequent closure of the shaft provide a potentially permeable  
35 vertical conduit connecting water-bearing units. The primary motivation for limiting formation  
36 crossflow within the Rustler is to prevent mixing of formation waters within the Rustler, as  
37 required by State of New Mexico statute. Commonly, such an undertaking would limit migration  
38 of higher dissolved solids (high-density) groundwater into lower dissolved solids groundwater.  
39 In the vicinity of the WIPP site, the Culebra has a higher density groundwater than the Magenta,  
40 and the potential for fluid migration between the two most transmissive units is from the unit with  
41 the lower total dissolved solids to the unit with the higher dissolved solids. This calculation  
42 shows that potential flow rates between the Culebra and the Magenta are insignificant. Under  
43 expected conditions, intra-Rustler flow is expected to be of such a limited quantity that (1) it will  
44 not affect either the hydraulic or chemical regime within the Culebra or the Magenta and (2) it  
45 will not be detrimental to the seal system itself.

## 1 Concluding Remarks

2 The principal conclusion is that an effective, implementable shaft seal system has been  
3 designed for the WIPP. Design guidance is addressed by limiting any transport of fluids within  
4 the shaft, thereby limiting transport of hazardous material to regulatory boundaries. The  
5 application or adaptation of existing technologies for placement of seal components combined  
6 with the use of available, common materials provide confidence that the design can be  
7 constructed. The structural setting for seal elements is compressive, with shear stresses well  
8 below the strength of seal materials. Because of the favorable hydrologic regime coupled with  
9 the low intrinsic permeability of seal materials, long-term stability of the shaft seal system is  
10 expected. Credibility of these conclusions is bolstered by the basic design approach of using  
11 multiple components to perform each sealing function and by using extensive lengths within the  
12 shafts to effect a sealing system. The shaft seal system adequately meets design requirements  
13 and can be constructed.

### 14 1. Introduction

#### 15 1.1 Purpose of Compliance Submittal Design Report

16 This report documents the detailed design of the shaft sealing system for the Waste Isolation  
17 Pilot Plant (**WIPP**). The design documented in this report builds on the concepts and preliminary  
18 evaluations presented in the Sealing System Design Report issued in 1995 (DOE, 1995). The  
19 report contains a detailed description of the design and associated construction procedures,  
20 material specifications, analyses of structural and fluid flow performance, and design drawings.  
21 The design documented in this report forms the basis for the shaft sealing system which will be  
22 constructed under the authority of the hazardous waste facility Permit issued by NMED and as  
23 required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111(b) and 264.601(a)).

#### 24 1.2 WIPP Description

25 The WIPP is designed as a full-scale, mined geological repository for the safe management,  
26 storage, and disposal of transuranic (**TRU**) radioactive wastes and TRU mixed wastes  
27 generated by US government defense programs. The facility is located near Carlsbad, New  
28 Mexico, in the southeastern portion of the state. The underground facility (Figure G2-1) consists  
29 of a series of shafts, drifts, panels, and disposal rooms. Four shafts, ranging in diameter from  
30 3.5 to 6.1 m, connect the disposal horizon to the surface. Sealing of these four shafts is the  
31 focus of this report.

32 The disposal horizon is at a depth of approximately 655 m in bedded halite within the Salado  
33 Formation. The Salado is a sequence of bedded evaporites approximately 600 m thick that were  
34 deposited during the Permian Period, which ended about 225 million years ago. Salado salt has  
35 been identified as a good geologic medium to host a nuclear waste repository because of  
36 several favorable characteristics. The characteristics present at the WIPP site include very low  
37 permeability, vertical and lateral stratigraphic extent, tectonic stability, and the ability of salt to  
38 creep and ultimately entomb material placed in excavated openings. Creep closure also plays  
39 an important role in the shaft sealing strategy.

40 The WIPP facility must be determined to be in compliance with applicable regulations prior to  
41 the disposal of waste. After the facility meets the regulatory requirements, disposal rooms will  
42 be filled with containers holding TRU wastes of various forms. Wastes placed in the drifts and

1 disposal rooms will be at least 150 m from the shafts. Regulatory requirements include use of  
2 both engineered and natural barriers to limit migration of hazardous constituents from the  
3 repository to the accessible environment. The shaft seals are part of the engineered barriers.

### 4 **1.3 Performance Objective for WIPP Shaft Seal System**

5 Each of the four shafts from the surface to the underground repository must be sealed to limit  
6 hazardous material release to the accessible environment and to limit groundwater flow into the  
7 repository. Although the seals will be permanent, the regulatory period applicable to the  
8 repository system analyses is 10,000 years.

### 9 **1.4 Sealing System Design Development Process**

10 This report presents a conservative approach to shaft sealing system design. Shaft sealing  
11 system performance plays a crucial role in meeting regulatory radionuclide and hazardous  
12 constituents release requirements. Although all engineering materials have uncertainties in  
13 properties, a combination of available, low-permeability materials can provide an effective  
14 sealing system. To reduce the impact of system uncertainties and to provide a high level of  
15 assurance of compliance, numerous components are used in this sealing system. Components  
16 in this design include long columns of clay, densely compacted crushed salt, a waterstop of  
17 asphaltic material sandwiched between massive low-permeability concrete plugs, a column of  
18 asphalt, and a column of earthen fill. Different materials perform identical functions within the  
19 design, thereby adding confidence in the system performance through redundancy.

20 The design is based on common materials and construction methods that utilize available  
21 technologies. When choosing materials, emphasis was given to permeability characteristics and  
22 mechanical properties of seal materials. However, the system is also chemically and physically  
23 compatible with the host formations, enhancing long-term performance.

24 Recent laboratory experiments, construction demonstrations, and field test results have been  
25 added to the broad and credible database and have supported advances in modeling capability.  
26 Results from a series of multi-year, in situ, small-scale seal performance tests show that  
27 bentonite and concrete seals maintain very low permeabilities and show no deleterious effects  
28 in the WIPP environment. A large-scale dynamic compaction demonstration established that  
29 crushed salt can be successfully compacted. Laboratory tests show that compacted crushed  
30 salt consolidates through creep closure of the shaft from initial conditions achieved in dynamic  
31 compaction to a dense salt mass with regions where permeability approaches that of in situ salt.  
32 These technological advances have allowed more credible analysis of the shaft sealing system.

33 The design was developed through an interactive process involving a design team consisting of  
34 technical specialists in the design and construction of underground facilities, materials behavior,  
35 rock mechanics analysis, and fluid flow analysis. The design team included specialists drawn  
36 from the staff of Sandia National Laboratories, Parsons Brinckerhoff Quade and Douglas, Inc.  
37 (contract number AG-4909), INTERA, Inc. (contract number AG-4910), and RE/SPEC Inc.  
38 (contract number AG-4911), with management by Sandia National Laboratories. The  
39 contractors developed a quality assurance program consistent with the Sandia National  
40 Laboratories Quality Assurance Program Description for the WIPP project. All three contractors  
41 received quality assurance support visits and were audited through the Sandia National  
42 Laboratories audit and assessment program. Quality assurance (QA) documentation is  
43 maintained in the Sandia National Laboratories WIPP Central Files. Access to project files for

1 each contractor can be accomplished using the contract numbers specified above. In addition to  
2 the contractor support, technical input was obtained from consultants in various technical  
3 specialty areas.

4 Formal preliminary and final design reviews have been conducted on the technical information  
5 documented in the report. In addition, technical, management, and QA reviews have been  
6 performed on this report. Documentation is in the WIPP Central File.

7 It is recognized that additional information, such as on specific seal material or formation  
8 characteristics, on the sensitivity of system performance to component properties, on placement  
9 effectiveness, and on long-term performance, could be used to simplify the design and perhaps  
10 reduce the length or number of components. Such design optimization and associated  
11 simplifications are left to future research that may be used to update the compliance evaluations  
12 completed between now and the time of actual seal emplacement.

### 13 **1.5 Organization of Document**

14 This report contains an Executive Summary, 10 sections, and 5 appendices. The body of the  
15 report does not generally contain detailed backup information; this information is incorporated  
16 by reference or in the appendices.

17 The Executive Summary is a synopsis of the design and the supporting discussions related to  
18 seal materials, construction procedures, structural analyses, and fluid flow analyses.  
19 Introductory material in Section 1 sets the stage for and provides a “road map” to the remainder  
20 of the report.

21 Site characteristics that detail the setting into which the seals would be placed are documented  
22 in Section 2. These characteristics include the WIPP geology and stratigraphy for both the  
23 region and the shafts as well as a brief discussion of rock mechanics considerations of the site  
24 that impact the sealing system. Regional and local characteristics of the hydrologic and  
25 geochemical settings are also briefly discussed.

26 Section 3 presents the design guidance used for development of the shaft sealing system  
27 design. Seal-related guidance from applicable regulations is briefly described. The design  
28 guidance is then provided along with the design approach used to implement the guidance. The  
29 guidance forms the basis both for the design and for evaluations of the sealing system  
30 presented in other sections.

31 The shaft sealing system is documented in Section 4; detailed drawings for the design are  
32 provided in Appendix G2-E. The seal components, their design, and their functions are  
33 discussed for the Salado, the Rustler, and the overlying formations.

34 The sealing materials are described briefly in Section 5, with more detail provided in the  
35 materials specifications (Appendix G2-A). The materials used in the various seal components  
36 are discussed along with the reasons they are expected to function as intended. Material  
37 properties including permeability, strength, and mechanical constitutive response are given for  
38 each material. Brief discussions of expected compatibility, performance, construction  
39 techniques, and other characteristics relevant to the WIPP setting are also given.



1 Section 6 contains a brief description of the construction techniques proposed for use. General  
2 site and sealing preparation activities are discussed, including construction of a multi-deck stage  
3 for use throughout the placement of the components. Construction procedures to be used for  
4 the various types of components are then summarized based on the more detailed discussions  
5 provided in Appendix G2-B.

6 Section 7 summarizes structural analyses performed to assess the ability of the shaft sealing  
7 system to function in accordance with the design guidance provided in Section 3 and to provide  
8 input to hydrological calculations. The methods and computer programs, the models used to  
9 simulate the behavior of the seal materials and surrounding salt, and the results of the analyses  
10 are discussed. Particular emphasis is placed on the evaluations of the behavior of the disturbed  
11 rock zone. Details of the structural analyses are presented in Appendix D of *Waste Isolation  
12 Pilot Plant Shaft Sealing System Compliance Submittal Design Report (“Compliance Submittal  
13 Design Report”)* (Sandia, 1996). Section 8 summarizes fluid flow analyses performed to assess  
14 the ability of the shaft sealing system to function in accordance with the design guidance  
15 provided in Section 3. Hydrologic evaluations are focused on processes that could result in fluid  
16 flow through the shaft seal system and the ability of the seal system to limit such flow.  
17 Processes evaluated are downward migration of groundwater from the overlying formation, gas  
18 migration and reconsolidation of the crushed salt component, upward migration of brines from  
19 the repository, and flow between water-bearing zones in the overlying formation. Hydrologic  
20 models are described and the results are discussed as they relate to satisfying the design  
21 guidance, with extensive reference to Appendix C of the Compliance Submittal Design Report  
22 (Sandia, 1996) that documents details of the flow analyses. Conclusions drawn about the  
23 performance of the WIPP shaft sealing system are described in Section 9. The principal  
24 conclusion that an effective, implementable design has been presented is based on the  
25 presentations in the previous sections. A reference list that documents principal references used  
26 in developing this design is then provided.

27 The three appendices that follow provide details related to the following subjects:

- 28 Appendix G2-A — Material Specification
- 29 Appendix G2-B — Shaft Sealing Construction Procedures
- 30 Appendix G2-E — Design Drawings (separate volume)

## 31 **1.6 Systems of Measurement**

32 Two systems of measurement are used in this document and its appendices. Both the System  
33 International d’Unites (SI) and English Gravitational (*fps* units) system are used. This usage  
34 corresponds to common practice in the United States, where SI units are used for scientific  
35 studies and *fps* units are used for facility design, construction materials, codes, and standards.  
36 Dual dimensioning is used in the design description and other areas where this use will aid the  
37 reader.

38

## 2. Site Geologic, Hydrologic, and Geochemical Setting

The site characteristics relevant to the sealing system are discussed in this section. The location and geologic setting of the WIPP are discussed first to provide background. The geology and stratigraphy, which affect the shafts, are then discussed. The hydrologic and geochemical settings, which influence the seals, are described last.

### 2.1 Introduction

The WIPP site is located in an area of semiarid rangeland in southeastern New Mexico. The nearest major population center is Carlsbad, 42 km west of the WIPP. Two smaller communities, Loving and Malaga, are about 33 km to the southwest. Population density close to the WIPP is very low: fewer than 30 permanent residents live within a 16-km radius.

### 2.2 Site Geologic Setting

Geologically the WIPP is located in the Delaware Basin, an elongated depression that extends from just north of Carlsbad southward into Texas. The Delaware Basin is bounded by the Capitan Reef (see Figure G2-2). The basin covers over 33,000 km<sup>2</sup> and is filled with sedimentary rocks to depths of 7,300 m (Hills, 1984). Rock units of the Delaware Basin (representing the Permian System through the Quaternary System) are listed in Figure G2-3.

Minimal tectonic activity has occurred in the region since the Permian Period (Powers et al., 1978). Faulting during the late Tertiary Period formed the Guadalupe and Delaware Mountains along the western edge of the basin. The most recent igneous activity in the area occurred during the mid-Tertiary Period about 35 million years ago and is evidenced by a dike in the subsurface 16 km northwest of the WIPP. Major volcanic activity last occurred more than 1 billion years ago during Precambrian time (Powers et al., 1978). None of these processes affected the Salado Formation at the WIPP. Therefore, seismic-related design criteria are not included in the current seal systems design guidelines.

#### 2.2.1 Regional WIPP Geology and Stratigraphy

The Delaware Basin began forming with crustal subsidence during the Pennsylvanian Period approximately 300 million years ago. Relatively rapid subsidence over a period of about 14 million years resulted in the deposition of a sequence of deep-water sandstones, shales, and limestones rimmed by shallow-water limestone reefs such as the Capitan Reef (see Figure G2-2). Subsidence slowed during the late Permian Period. Evaporite deposits of the Castile Formation and the Salado Formation (which hosts the WIPP underground workings) filled the basin and extended over the reef margins. The evaporites, carbonates, and clastic rocks of the Rustler Formation and the Dewey Lake Redbeds were deposited above the Salado Formation near the end of the Permian Period. The Santa Rosa and Gatuña Formations were deposited after the close of the Permian Period.

From the surface downward to the repository horizon the stratigraphic units are the Quaternary surface sand sediments, Gatuña Formation, Santa Rosa Formation, Dewey Lake Redbeds, Rustler Formation, and Salado Formation. Three principal stratigraphic units (the Dewey Lake Redbeds, the Rustler Formation, and the Salado Formation) comprise all but the upper 15 to 30 m (50 to 100 ft) of the geologic section above the WIPP facility.

1 The Dewey Lake Redbeds consist of alternating layers of reddish-brown, fine-grained  
2 sandstone and siltstone cemented with calcite and gypsum (Vine, 1963). The Rustler Formation  
3 lies below the Dewey Lake Redbeds; this formation, the youngest of the Late Permian evaporite  
4 sequence, includes units that provide potential pathways for radionuclide migration from the  
5 WIPP. The five units of the Rustler, from youngest to oldest, are: (1) the Forty-niner Member, (2)  
6 the Magenta Dolomite Member, (3) the Tamarisk Member, (4) the Culebra Dolomite Member,  
7 and (5) an unnamed lower member.

8 The 250-million-year-old Salado Formation lies below the Rustler Formation. This unit is about  
9 600 m thick and consists of three informal members. From youngest to oldest, they are: (1) an  
10 upper member (unnamed) composed of reddish-orange to brown halite interbedded with  
11 polyhalite, anhydrite, and sandstone, (2) a middle member (the McNutt Potash Zone) composed  
12 of reddish-orange and brown halite with deposits of sylvite and langbeinite; and (3) a lower  
13 member (unnamed) composed of mostly halite with lesser amounts of anhydrite, polyhalite, and  
14 glauberite, with some layers of fine clastic material. These lithologic layers are nearly horizontal  
15 at the WIPP, with a regional dip of less than one degree. The WIPP repository is located in the  
16 unnamed lower member of the Salado Formation, approximately 655 m (2150 ft) below the  
17 ground surface.

## 18 **2.2.2 Local WIPP Stratigraphy**

19 The generalized stratigraphy of the WIPP site, with the location of the repository, is shown in  
20 Figure G2-4. To establish the geologic framework required for the design of the WIPP facility  
21 shaft sealing system, an evaluation was performed to assess the geologic conditions existing in  
22 and between the shafts, where the individual shaft sealing systems will eventually be emplaced  
23 (DOE, 1995: Appendix G2-A). The study evaluated shaft stratigraphy, regional groundwater  
24 occurrence, brine occurrence in the exposed Salado Formation section, and the consistency  
25 between recorded data and actual field data.

26 Four shafts connect the WIPP underground workings to the surface, the (1) Air Intake Shaft  
27 (**AIS**), (2) Exhaust Shaft, (3) Salt Handling Shaft, and (4) Waste Shaft. Stratigraphic correlation  
28 and evaluation of the unit contacts show that lithologic units occur at approximately the same  
29 levels in all four shaft locations. Some stratigraphic contact elevations vary because of regional  
30 structure and stratigraphic thinning and thickening of units. However, the majority of the  
31 stratigraphic contacts used to date are suitable for engineering design reference because they  
32 intersect all four shafts.

## 33 **2.2.3 Rock Mechanics Setting**

34 The WIPP stratigraphy includes rock types that exhibit both brittle and ductile behaviors. The  
35 majority of the stratigraphy intercepted by the shafts consists of the Salado Formation, which is  
36 predominantly halite. The primary mechanical behavior of halitic rocks is creep. Except near  
37 free surfaces (such as the shaft wall), the salt rocks will remain tight and undisturbed despite the  
38 long-term creep deformation they sustain. The other rock types within the Salado Formation are  
39 anhydrites and polyhalites. These two rock types are typically brittle, stiff, and exhibit high  
40 strength in laboratory tests. The structural strength of particular anhydritic rock layers, however,  
41 depends on the thickness of the layers, which range from thin (<1 m) to fairly thick (10 m or  
42 more). Brittle failure of these noncreeping rocks can occur as they restrain, or attempt to  
43 restrain, the creep of the salt above and below the stiff layer. Although thick layers can resist the



1 induced stresses, thin layers are fractured in tension by the salt creep. Because the deformation  
2 in the bounding salt is time dependent, the damage in the brittle rock is also time dependent.

3 Above the Salado Formation, the Rustler Formation stratigraphy consists of relatively strong  
4 limestones and siltstones. The shaft excavation is the only significant disturbance to these  
5 rocks. Any subsurface subsidence (deformation) or loading induced by the presence of the  
6 repository are negligible in a rock mechanics sense.

7 Regardless of rock type, the shafts create a disturbed zone in the surrounding rock.  
8 Microfracturing will occur in the rock adjacent to the shaft wall, where confining stresses are low  
9 or nonexistent. The extent of the zone depends on the rock strength and the prevailing stress  
10 state, which is depth dependent. In the salt rocks, microfracturing occurs to form the disturbed  
11 zone both at the time of excavation and later as dilatant creep deformations occur. In the brittle  
12 rocks, the disturbance occurs at the time of excavation and does not worsen with time. The  
13 extent of disturbed zones in the salt and brittle rocks can be calculated, as will be described in  
14 Section 7 and Appendix D in the Compliance Submittal Design Report (Sandia, 1996).

15 Preventing the salt surrounding the shafts from creeping causes reintroduction of stresses that  
16 reverse the damage process and cause healing (Van Sambeek et al., 1993). The seal system  
17 design relies on this principle for sealing the disturbed zone in salt. In the brittle rocks, grouting  
18 of the damage is a viable means of reducing the interconnected fractures that increase the  
19 permeability of the rock.

## 20 **2.3 Site Hydrologic Setting**

21 The WIPP shafts penetrate approximately 655 m (2150 ft) of sediments and rocks. From a  
22 hydrogeologic perspective, relevant information includes the permeability of the water-bearing  
23 units, the thickness of the water-bearing units, and the observed vertical pressure (head)  
24 gradients expected to exist after shaft construction and ambient pressure recovery. This section  
25 will discuss these three aspects of the site hydrogeology. The geochemistry of the pore fluids  
26 adjacent to the shaft system is also important hydrogeologic information and will be provided in  
27 Section 2.4.

### 28 **2.3.1 Hydrostratigraphy**

29 The WIPP shafts penetrate Quaternary surface sediments, the Gatuña Formation, the Santa  
30 Rosa Formation, the Dewey Lake Redbeds, the Rustler Formation, and the Salado Formation.  
31 The Rustler Formation contains the only laterally-persistent water-bearing units in the WIPP  
32 vicinity. As a result, flow-field characterization, regional flow-modeling, and performance  
33 assessment off-site release scenarios focus on the Rustler Formation. The hydrogeology of the  
34 stratigraphic units in contact with the upper portion of the AIS sealing system is fairly well known  
35 from detailed hydraulic testing of the Rustler Formation at well H-16 located 17 m from the AIS  
36 (Beauheim, 1987). The H-16 borehole was drilled in July and August 1987 to monitor the  
37 hydraulic responses of the Rustler members to the drilling and construction of the AIS. During  
38 the drilling of H-16, each member of the Rustler Formation was cored. In addition, detailed drill-  
39 stem, pulse, and slug hydraulic tests were performed in H-16 on the members of the Rustler.  
40 Through the detailed testing program at H-16, the permeability of each of the Rustler members  
41 was estimated. Detailed mapping of the AIS by Holt and Powers (1990) and other investigators  
42 provided information on the location of wet zones and weeps within the Salado Formation. This

1 information will be summarized below. The reader, unless particularly interested in this subject,  
2 should proceed to Section 2.3.2.

3 Water-bearing zones have been observed in units above the Rustler Formation in the WIPP site  
4 vicinity. However, drilling in the Dewey Lake Redbeds has not identified any continuous  
5 saturated units at the WIPP site. Water-bearing units within stratigraphic intervals above the  
6 Rustler are typically perched saturated zones of very low yield. Thin perched groundwater  
7 intervals have been encountered in WIPP wells H-1, H-2, and H-3 (Mercer and Orr, 1979). The  
8 only Dewey Lake Redbed wells that have sufficient yields for watering livestock are the James  
9 Ranch wells, the Pocket well, and the Fairfield well (Brinster, 1991). These wells are located to  
10 the south of the WIPP and are not in the immediate vicinity of the WIPP shafts.

11 The Dewey Lake Redbeds overlie the Rustler Formation. The Rustler is composed of five  
12 members defined by lithology. These are, in ascending order, the unnamed lower member, the  
13 Culebra dolomite, the Tamarisk, the Magenta dolomite, and the Forty-niner (see Figure G2-4).  
14 Of these five members, the unnamed lower member, the Culebra, and the Magenta are the  
15 most transmissive units in the Rustler. The Tamarisk and the Forty-niner are aquitards within  
16 the Rustler and have very low permeabilities relative to the three members listed above.

17 To the east of the shafts in Nash Draw, the Rustler/Salado contact has been observed to be  
18 permeable and water-bearing. This contact unit has been referred to as the “brine aquifer”  
19 (Mercer, 1983). The brine aquifer is not reported to exist in the vicinity of the shafts. The  
20 hydraulic conductivity of the Rustler/Salado contact in the vicinity of the shafts is reported to be  
21 approximately  $4 \times 10^{-11}$  m/s, which is equivalent to a permeability of  $6 \times 10^{-18}$  m<sup>2</sup> using  
22 reference brine fluid properties (Brinster, 1991). The unnamed lower member was hydraulic  
23 tested at well H-16 in close proximity to the AIS. The maximum permeability of the unnamed  
24 lower member was interpreted to be  $2.2 \times 10^{-18}$  m<sup>2</sup> and was attributed to the unnamed lower  
25 member claystone by Beauheim (1987), which correlates to the transition and bioturbated  
26 clastic zones of Holt and Powers (1990).

27 The Culebra Dolomite Member is the most transmissive member of the Rustler Formation in the  
28 vicinity of the WIPP site and is the most transmissive saturated unit in contact with the shaft  
29 sealing system. The Culebra is an argillaceous dolomitic which contains secondary porosity in  
30 the form of abundant vugs and fractures. The permeability of the Culebra varies greatly in the  
31 vicinity of the WIPP and is controlled by the condition of the secondary porosity (fractures). The  
32 permeability of the Culebra in the vicinity of the shafts is approximately  $2.1 \times 10^{-14}$  m<sup>2</sup>.

33 The Tamarisk Member is composed primarily of massive, lithified anhydrite, including anhydrite  
34 2, mudstone 3, and anhydrite 3. Testing of the Tamarisk at H-16 was unsuccessful. The  
35 estimated transmissivity of the Tamarisk at H-16 is one to two orders of magnitude lower than  
36 the least-transmissive unit successfully tested at H-16, which results in a permeability range  
37 from  $4.6 \times 10^{-20}$  to  $4.6 \times 10^{-19}$  m<sup>2</sup>. Anhydrites in the Rustler have an approximate permeability of  
38  $1 \times 10^{-19}$  m<sup>2</sup>. The permeability of mudstone 3 is  $1.5 \times 10^{-19}$  m<sup>2</sup> (Brinster, 1991).

39 The Magenta is a dolomite that is typically less permeable than the Culebra. The Magenta  
40 Dolomite Member overlies the Tamarisk Member. The Magenta is an indurated, gypsiferous,  
41 arenaceous, dolomite that Holt and Powers (1990) classify as a dolarenite. The dolomite grains  
42 are primarily composed of silt to fine sand-sized clasts. Wavy to lenticular bedding and ripple  
43 cross laminae are prevalent through most of the Magenta. Holt and Powers (1990) estimate that

1 inflow to the shaft from the Magenta during shaft mapping was less than 1 gal/min. The  
 2 Magenta has a permeability of approximately  $1.5 \times 10^{-15} \text{ m}^2$  (Saulnier and Avis, 1988).

3 The Forty-niner Member is divided into three informal lithologic units. The lowest unit is  
 4 anhydrite 4, a laminated anhydrite having a gradational contact with the underlying Magenta.  
 5 Mudstone 4 overlies anhydrite 4 and is composed of multiple units containing mudstones,  
 6 siltstones, and very fine sandstones. Anhydrite 5 is the uppermost informal lithologic unit of the  
 7 Forty-niner Member. The permeability of mudstone 4, determined from the pressure responses  
 8 in the Forty-niner interval of H-16 to the drilling of the AIS, is  $3.9 \times 10^{-16} \text{ m}^2$  (referred to as the  
 9 Forty-niner claystone by Avis and Saulnier, 1990).

10 The Salado Formation is a very low permeability formation that is composed of bedded halite,  
 11 polyhalite, anhydrite, and mudstones. Inflows in the shafts have been observed over select  
 12 intervals during shaft mapping, but flows are below the threshold of quantification. In some  
 13 cases these weeps are individual, lithologically distinct marker beds, and in some cases they  
 14 are not. Directly observable brine flow from the Salado Formation into excavated openings is a  
 15 short-lived process. Table G2-1 lists the brine seepage intervals identified by Holt and Powers  
 16 (1990) during their detailed mapping of the AIS. Seepage could be indicated by a wet rockface  
 17 or by the presence of precipitate from brine evaporation on the shaft rockface. The zones listed  
 18 in Table G2-1 make up less than 10% of the Salado section that is intersected by the WIPP  
 19 shafts.

20 **Table G2-1**  
 21 **Salado Brine Seepage Intervals<sup>(1)</sup>**

Stratigraphic Unit	Lithology	Thickness (m)
Marker Bed 103	Anhydrite	5.0
Marker Bed 109	Anhydrite	7.7
Vaca Triste	Mudstone	2.4
Zone A	Halite	2.9
Marker Bed 121	Polyhalite	0.5
Union Anhydrite	Anhydrite	2.3
Marker Bed 124	Anhydrite	2.7
Zone B	Halite	0.9
Zone C	Halite	2.7
Zone D	Halite	3.2
Zone E	Halite	0.6
Zone F	Halite	0.9
Zone G	Halite	0.6
Zone H	Halite	1.8
Marker Bed 129	Polyhalite	0.5
Zone I	Halite	1.7
Zone J	Halite	1.2

<sup>(1)</sup> After US DOE, 1995.

1 To gain perspective into the important stratigraphic units from a hydrogeologic view, the  
 2 permeability and thickness of the units adjacent to the shafts can be compared. Table G2-2 lists  
 3 the lithologic units in the Rustler and the Salado Formations with their best estimate  
 4 permeabilities and their thickness as determined from the AIS mapping. The stratigraphy of the  
 5 units overlying the Rustler is not considered in Table G2-2 because these units are typically not  
 6 saturated in the vicinity of the WIPP shafts. The overlying sediments account for approximately  
 7 25% of the stratigraphy column adjacent to the shafts.

8 Because permeability varies over several orders of magnitude, the log of the permeability is also  
 9 listed to simplify comparison between units. Table G2-2 shows that by far the two most  
 10 transmissive zones occur in the Rustler Formation; these are the Culebra and Magenta  
 11 dolomites. These units are relatively thin when compared to the combined Rustler and Salado  
 12 thickness adjacent to the shafts (3% of Rustler and Salado combined thickness). The Magenta  
 13 and the Culebra are the only two units that are known to possess permeabilities higher than  $1 \times$   
 14  $10^{-18} \text{ m}^2$ .

15 **Table G2-2**  
 16 **Permeability and Thickness of Hydrostratigraphic Units in Contact with Seals**

Formation	Member/Lithology	Undisturbed Permeability ( $\text{m}^2$ )	Thickness (m)
Rustler	Anhydrite <sup>(1)</sup>	$1.0 \times 10^{-19}$	46.7
Rustler	Mudstone 4	$3.9 \times 10^{-16}$	4.4
Rustler	Magenta	$1.5 \times 10^{-15}$	7.8
Rustler	Mudstone 3	$1.5 \times 10^{-19}$	2.9
Rustler	Culebra	$2.1 \times 10^{-14}$	8.9
Rustler	Transition/ Bioturbated Clastics	$2.2 \times 10^{-18}$	18.7
Salado	Halite	$1.0 \times 10^{-21}$	356.6
Salado	Polyhalite	$3.0 \times 10^{-21}$	10.9
Salado	Anhydrite	$1.0 \times 10^{-19}$	28.2

(1) Anhydrite 5, Anhydrite 4, Anhydrite 3, and Anhydrite 2

17 The vast majority (97%) of the rocks adjacent to the shaft in the Rustler and the Salado  
 18 Formations are low permeability ( $<1 \times 10^{-18} \text{ m}^2$ ). The conclusion that can be drawn from  
 19 reviewing Table G2-2 is that the shafts are located hydrogeologically in a low permeability, low  
 20 groundwater flow regime. Inflow measurements have historically been made at the shafts, and  
 21 observable flow is attributed to leakage from the Rustler Formation.

22 Flow modeling of the Culebra has demonstrated that depressurization has occurred as a result  
 23 of the sinking of the shafts at the site. Maximum estimated head drawdown in the Culebra at the  
 24 centroid of the shafts was estimated by Haug et al. (1987) to be 33 m in the mid-1980s. This  
 25 drawdown in the permeable units intersected by the shafts is expected because the shafts act  
 26 as long-term constant pressure (atmospheric) sinks. Measurements of fluid flow into the WIPP  
 27 shafts when they were unlined show a range from a maximum of 0.11 L/s (3,469  $\text{m}^3/\text{yr}$ )  
 28 measured in the Salt Handling Shaft on September 13, 1981 to a minimum of 0.008 L/s  
 29 (252  $\text{m}^3/\text{yr}$ ) measured at the Waste Handling Shaft on August 6, 1987 (LaVenue et al., 1990).

1 The following summary of shaft inflow rates from the Rustler is based on a review of LaVenue et  
2 al. (1990) and Cauffman et al. (1990). Shortly after excavation and prior to grouting and liner  
3 installation, the inflow into the Salt Handling Shaft was 0.11 L/s (3,469 m<sup>3</sup>/yr). The average flow  
4 rate measured after shaft lining for the period from mid-1982 through October 1992 was  
5 0.027 L/s (851 m<sup>3</sup>/yr). The average flow rate into the Waste Handling Shaft during the time  
6 when the shaft was open and unlined was about 0.027 L/s (851 m<sup>3</sup>/yr). Between the first and  
7 second grouting events (July 1984 to November 1987) the average inflow rate was 0.016 L/s  
8 (505 m<sup>3</sup>/yr). No estimates were found after the second grouting. Inflow to the pilot holes for the  
9 Exhaust Shaft averaged 0.028 L/s (883 m<sup>3</sup>/yr). In December 1984 a liner plate was grouted  
10 across the Culebra. After this time, a single measurement of inflow from the Culebra was  
11 0.022 L/s (694 m<sup>3</sup>/yr). After liner plate installation, three separate grouting events occurred at  
12 the Culebra. No measurable flow was reported after the third grouting event in the summer of  
13 1987. Flow into the AIS when it was unlined and draining averaged 0.044 L/s (1,388 m<sup>3</sup>/yr).  
14 Since the Rustler has been lined, flow into the AIS has been negligible.

15 The majority of the flow represented by these shaft measurements originates from the Rustler.  
16 This is clearly evident by the fact that lining of the WIPP shafts was found to be unnecessary in  
17 the Salado Formation below the Rustler/Salado contact. When the liners were installed, flow  
18 rates diminished greatly. Under sealed conditions, hydraulic gradients in rocks adjacent to the  
19 shaft will diminish as the far-field pressures approach ambient conditions. The low-permeability  
20 materials sealing the shaft combined with the reduction in lateral hydraulic gradients will likely  
21 result in flow rates into the shaft that are several orders of magnitude less than observed under  
22 open shaft or lined shaft conditions.

### 23 2.3.2 Observed Vertical Gradients

24 Hydraulic heads within the Rustler and between the Rustler and Salado Formations are not in  
25 hydrostatic equilibrium. Mercer (1983) recognized that heads at the Rustler Salado transition  
26 (referred to as the brine aquifer and not present in the vicinity of the WIPP shafts) indicate an  
27 upward hydraulic gradient from that zone to the Culebra. Later, with the availability of more  
28 head measurements within the Salado and Rustler members, Beauheim (1987) provided  
29 additional insight into the potential direction of vertical fluid movement within the Rustler. He  
30 reported that the hydraulic data indicate an upward gradient from the Salado to the Rustler.

31 Formation pressures in the Salado Formation have been decreased in the near vicinity of the  
32 WIPP underground facility. The highest, and thought to be least disturbed, estimated formation  
33 fluid pressure from hydraulic testing is 12.55 MPa estimated from interpretation of testing within  
34 borehole SCP01 in Marker Bed 139 (**MB139**) just below the underground facility horizon  
35 (Beauheim et al., 1993). The fresh-water head within MB139, based on the estimated static  
36 formation pressure of 12.55 MPa, is 1,663.6 m (5,458 ft) above mean sea level (**msl**).

37 Hydraulic heads in the Rustler have also been impacted by the presence of the WIPP shafts.  
38 Impacts in the Culebra were significant in the 1980s with a large drawdown cone extending  
39 away from the shafts in the Culebra (Haug et al., 1987). The undisturbed head of the Rustler  
40 Salado contact in the vicinity of the AIS is estimated to be about 936.0 m (3,071 ft) msl (Brinster,  
41 1991). The undisturbed head in the Culebra is estimated to be approximately 926.9 m (3,041 ft)  
42 msl in the vicinity of the AIS (LaVenue et al., 1990). The undisturbed head in the Magenta is  
43 estimated to be approximately 960.1 m (3,150 ft) msl (Brinster, 1991).

1 The disturbed and undisturbed heads in the Rustler are summarized in Table G2-3. Also  
 2 included is the freshwater head of MB139 based on hydraulic testing in the WIPP underground.  
 3 Consistent with the vertical flow directions proposed by previous investigators, estimated  
 4 vertical gradients in the vicinity of the AIS before the shafts were drilled indicate a hydraulic  
 5 gradient from the Magenta to the Culebra and from the Rustler/Salado contact to the Culebra.  
 6 There is also the potential for flow from the Salado Formation to the Rustler Formation.

7 **Table G2-3**  
 8 **Freshwater Head Estimates in the Vicinity of the Air Intake Shaft**

Hydrologic Unit	Freshwater Head (m asl)		Reference
	Undisturbed	Disturbed	
Magenta Member	960.1 <sup>1</sup>	948.8 <sup>2</sup> (H-16)	Brinster (1991) Beauheim (1987)
Culebra Member	926.9 <sup>1</sup>	915.0 <sup>2</sup> (H-16)	LaVenue et al. (1990) Beauheim (1987)
Lower Unnamed Member	—	953.4 <sup>2</sup> (H-16)	Beauheim (1987)
Rustler/Salado Contact	936.0 - 940.0 <sup>1</sup>	—	Brinster (1991)
Salado MB139	1,663.6 <sup>2</sup>	—	Beauheim et al. (1993)

<sup>1</sup> Estimated from a contoured head surface plot based principally on well data collected prior to shaft construction.

<sup>2</sup> Measured through hydraulic testing and/or long-term monitoring.

9 **2.4 Site Geochemical Setting**

10 **2.4.1 Regional and Local Geochemistry in Rustler Formation and Shallower Units**

11 The Rustler Formation, overlying the Salado Formation, consists of interbedded  
 12 anhydrite/gypsum, mudstone/siltstone, halite east of the WIPP site, and two layers of dolomite.  
 13 Principal occurrences of NaCl/MgSO<sub>4</sub> brackish to briny groundwater in the Rustler at the WIPP  
 14 site and to the north, west, and south are found (1) at the lower member near its contact with  
 15 the underlying Salado and (2) in the two dolomite members having a variable fracture-induced  
 16 secondary porosity. The mineralogy of the Rustler Formation is summarized in Table G2-4.

17 The five members of the Rustler Formation are described as follows: (1) The Forty-niner  
 18 Member is similar in lithology to the other non-dolomitic units but contains halite east of the  
 19 WIPP site. (2) The Magenta Member is another variably fractured dolomite/sulfate unit  
 20 containing sporadic occurrences of groundwater near and west of the WIPP site. (3) The  
 21 Tamarisk Member is dominantly anhydrite (locally altered to gypsum) with subordinate fine-  
 22 grained clastics, containing halite to the east of the WIPP site. (4) The Culebra Dolomite  
 23 Member is dominantly dolomite with subordinate anhydrite and/or gypsum, having a variable  
 24 fracture-induced secondary porosity containing regionally continuous occurrences of  
 25 groundwater at the WIPP site and to the north, west, and south. (5) An unnamed lower member  
 26 consists of sandstone, siltstone, mudstone, claystone, and anhydrite locally altered to gypsum,  
 27 and containing halite under most of the WIPP site and occurrences of brine at its base, mostly  
 28 west of the WIPP site.



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**Table G2-4  
 Chemical Formulas, Distributions, and Relative Abundance of Minerals in the Rustler and Salado Formations (after Lambert, 1992)**

Mineral	Formula	Occurrence/Abundance
Amesite	$(Mg_4Al_2)(Si_2Al_2)O_{10}(OH)_8$	S, R
Anhydrite	$CaSO_4$	SSS, RRR
Calcite	$CaCO_3$	S, RR
Carnallite	$KMgCl_3 \cdot 6H_2O$	SS†
Chlorite	$(Mg,Al,Fe)_{12}(Si,Al)_8O_{20}(OH)_{16}$	S‡, R‡
Corrensite	Mixed-layer chlorite/smectite	S‡, R‡
Dolomite	$CaMg(CO_3)_2$	RR
Feldspar	$(K,Na,Ca)(Si,Al)_4O_8$	S‡, R‡
Glauberite	$Na_2Ca(SO_4)_2$	S
Gypsum	$CaSO_4 \cdot 2H_2O$	S, RRR
Halite	$NaCl$	SSS, RRR
Illite	$K_{1-1.5}Al_4(Si_{7-6.5}Al_{1-1.5}O_{20})(OH)_4$	S‡, R‡
Kainite	$KMgClSO_4 \cdot 3H_2O$	SS†
Kieserite	$MgSO_4 \cdot H_2O$	SS†
Langbeinite	$K_2Mg_2(SO_4)_3$	S*
Magnesite	$MgCO_3$	S, R
Polyhalite	$K_2Ca_2Mg(SO_4)_4 \cdot 2H_2O$	SS, R
Pyrite	$FeS_2$	S, R
Quartz	$SiO_2$	S‡, R‡
Serpentine	$Mg_3Si_2O_5(OH)_4$	S‡, R‡
Smectite	$(Ca_{1/2},Na)_{0.7}(Al,Mg,Fe)_4(Si,Al)_8O_{20}(OH)_4 \cdot nH_2O$	S‡, R‡
Sylvite	$KCl$	SS*

Key to Occurrence/Abundance notations:

S = Salado Formation; R = Rustler Formation; 3x = abundant, 2x = common, 1x = rare or accessory; \* = potash-ore mineral (never near surface); † = potash-zone non-ore mineral; ‡ = in claystone interbeds.

4 The Dewey Lake Redbeds, overlying the Rustler Formation, are the uppermost Permian unit;  
 5 they consist of siltstones and claystones locally transected by concordant and discordant  
 6 fractures that may contain gypsum. The Dewey Lake Redbeds contain sporadic occurrences of  
 7 groundwater that may be locally perched, mostly in the area south of the WIPP site. The  
 8 Triassic Dockum Group (undivided) rests on the Dewey Lake Redbeds in the eastern half of the  
 9 WIPP site and thickens eastward; it is a locally important source of groundwater for agricultural  
 10 and domestic use.

11 The Gatuña Formation, overlying the Dewey Lake Redbeds, occurs locally as channel and  
 12 alluvial pond deposits (sands, gravels, and boulder conglomerates). The pedogenic Mescalero  
 13 caliche is commonly developed on top of the Gatuña Formation and on many other erosionally

1 truncated rock types. Surficial dune sand, which may be intermittently damp, covers virtually all  
 2 outcrops at and near the WIPP site. Siliceous alluvial deposits southwest of the WIPP site also  
 3 contain potable water. The geochemistry of groundwater found in the Rustler Formation and  
 4 Dewey Lake Redbeds is summarized in Table G2-5.

5 **Table G2-5**  
 6 **Major Solutes in Selected Representative Groundwater from the Rustler Formation and Dewey**  
 7 **Lake Redbeds, in mg/L (after Lambert, 1992)**

Well	Date	Zone	Ca	Mg	Na	K	SO <sub>4</sub>	Cl
WIPP-30	July 1980	R/S	955	2770	121,000	2180	7390	192,000
WIPP-29	July 1980	R/S	1080	2320	36,100	1480	12,000	58,000
H-5B	June 1981	Cul	1710	2140	52,400	1290	7360	89,500
H-9B	November 1985	Cul	590	37	146	7	1900	194
H-2A	April 1986	Cul	743	167	3570	94	2980	5310
P-17	March 1986	Cul	1620	1460	28,300	782	6020	48,200
WIPP-29	December 1985	Cul	413	6500	94,900	23,300	20,000	179,000
H-3B1	July 1985	Mag	1000	292	1520	35	2310	3360
H-4C	November 1986	Mag	651	411	7110	85	7100	8460
Ranch	June 1986	DL	420	202	200	4	1100	418

Key to Zone:

R/S = "basal brine aquifer" near the contact between the Rustler and Salado Formations; Cul = Culebra Member, Rustler Formation; Mag = Magenta Member, Rustler Formation; DL = Dewey Lake Redbeds.

## 8 **2.4.2 Regional and Local Geochemistry in the Salado Formation**

9 The Salado Formation consists dominantly of halite, interrupted at intervals of meters to tens of  
 10 meters by beds of anhydrite, polyhalite, mudstone, and local potash mineralization (sylvite or  
 11 langbeinite, with or without accessory carnallite, kieserite, kainite and glauberite, all in a halite  
 12 matrix). Some uniquely identifiable non-halite units, 0.1 to 10 m thick, have been numbered from  
 13 the top down (100 to 144) for convenience as marker beds to facilitate cross-basinal  
 14 stratigraphic correlation. The WIPP facility was excavated just above Marker Bed 139 in the  
 15 Salado Formation at a depth of about 655 m.

16 Although the most common Delaware Basin evaporite mineral is halite, the presence of less  
 17 soluble interbeds (dominantly anhydrite, polyhalite, and claystone) and more soluble admixtures  
 18 (e.g. sylvite, glauberite, kainite) has resulted in chemical and physical properties significantly  
 19 different from those of pure NaCl. Under differential stress produced near excavations, brittle  
 20 interbeds (anhydrite, polyhalite, magnesite, dolomite) may fracture, whereas under a similar  
 21 stress regime pure NaCl would undergo plastic deformation. Fracturing of these interbeds has  
 22 locally enhanced the permeability, allowing otherwise nonporous rock to carry groundwater  
 23 (e.g., the fractured polyhalitic anhydrite of Marker Bed 139 under the floor of the WIPP  
 24 excavations).

25 Groundwater in evaporites represents the exposure of chemical precipitates to fluids that may  
 26 be agents (as in the case of dissolution) or consequences of postdepositional alteration of the



1 evaporites (as in the cases of dehydration of gypsum and diagenetic dewatering of other  
2 minerals). Early in the geological studies of the WIPP site, groundwater occurrences that could  
3 be hydrologically characterized were identified.

4 Since the beginning of conventional mining in the Delaware Basin, relatively short-lived seeps  
5 (pools on the floor, efflorescences on the walls, and stalactitic deposits on the ceiling) have  
6 been known to occur in the Salado Formation where excavations have penetrated. These brine  
7 occurrences are commonly associated with the non-halitic interbeds whose porosity is governed  
8 either by fracturing (as in brittle beds) or mineralogical discontinuities (as in “clay” seams).

9 The geochemistry of brines encountered in the Salado Formation is summarized in Table G2-6.  
10 The relative abundance of minerals was summarized in Table G2-4.

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**Table G2-6**  
**Variations in Major Solutes in Brines from the Salado Formation, in mg/L (after Lambert, 1992)**

Source of Brine	Date	Ca	Mg	K	Na	Cl	SO <sub>4</sub>
Room G Seep	Sep-87	278	14800	15800	99000	188000	29500
	Nov-87	300	18700	15400	97100	190000	32000
	Feb-88	260	18200	17100	94100	186000	36200
	Mar-88	280	17000	16200	92100	187000	34800
	Jul-88	292	13000	14800	96600	188000	29300
	Sep-88	273	14700	13700	86500	185000	28000
	Apr-91	240	14400	12900	95000	189000	28000
	Jul-91	239	14100	13100	93000	190000	27700
	Oct-91	252	14700	14100	95000	189000	27100
Marker Bed 139 (under repository)		300	18900	14800	67700	155900	14700
		300	17100	15600	72700	158900	13400
		300	17600	15800	71600	182200	14700
Room J		230	17700	13500	63600	167000	15100
		210	27400	22400	56400	168000	19600
		220	17900	15600	73400	165000	9300
		250	22200	18300	63000	165000	31100
		190	31000	19900	46800	170000	24600
		100	35400	27800	40200	173000	30000
		270	18900	14500	59900	166000	16200
		280	20200	17000	70400	165000	10600
Room Q		279	31500	22600	68000	205000	19400
		288	31100	24100	68000	203000	19200
		257	34000	26300	63000	205000	23500
AIS Sump (accumulation in bottom of sump)	Jul-88	960	1040	1720	118000	187000	6170
	May-89	900	500	600	83100	122700	7700
	May-89	1000	800	1100	82400	114200	8800
McNutt Potash Zone							
Duval mine		640	55400	30000	27500	236500	3650
Miss. Chem. mine		200	44200	45800	43600	226200	12050

4

### 3. Design Guidance

#### 3.1 Introduction

The WIPP is subject to regulatory requirements contained in applicable portions of the New Mexico Hazardous Waste Act, specifically 20.4.1.500 NMAC and .900 (incorporating 40 CFR §264 and §270), and requirements contained in 40 CFR §191 and 40 CFR §194. The use of both engineered and natural barriers to isolate wastes from the accessible environment is required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR §191.14(d). The use of engineered barriers to prevent or substantially delay the movement of water, hazardous constituents, or radionuclides toward the accessible environment is required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR §194.44. Hazardous constituent release performance standards are specified in Permit Part 5 and 20.4.1.500 NMAC (incorporating 40 CFR §§264.111(b), 264.601(a), and 264 Subpart F). Quantitative requirements for potential releases of radioactive materials from the repository system are specified in 40 CFR §191. The regulations impose quantitative release requirements on the total repository system, not on individual subsystems of the repository system, for example, the shaft sealing subsystem.

#### 3.2 Design Guidance and Design Approach

The guidance described for the design of the shaft sealing system addresses the need for the WIPP to comply with system requirements and to follow accepted engineering practices using demonstrated technology. The design guidance addresses the need to limit:

1. radiological or other hazardous constituents reaching the regulatory boundaries,
2. groundwater flow into and through the sealing system,
3. chemical and mechanical incompatibility,
4. structural failure of system components,
5. subsidence and accidental entry, and
6. development of new construction technologies and/or materials.

For each element of design guidance, a design approach has been developed. Table G2-7 contains qualitative design guidance and the design approach used to implement it.

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**Table G2-7  
 Shaft Sealing System Design Guidance**

<b>Qualitative Design Guidance</b>	<b>Design Approach</b>
<i>The shaft sealing system shall limit:</i>	<i>The shaft sealing system shall be designed to meet the qualitative design guidance in the following ways:</i>
1. the migration of radiological or other hazardous constituents from the repository horizon to the regulatory boundary during the 10,000-year regulatory period following closure;	1. In the absence of human intrusion, brine migrating from the repository horizon to the Rustler Formation must pass through a low permeability sealing system.
2. groundwater flowing into and through the shaft sealing system;	2. In the absence of human intrusion, groundwater migrating from the Rustler Formation to the repository horizon must pass through a low permeability sealing system.
3. chemical and mechanical incompatibility of seal materials with the seal environment;	3. Brine contact with seal elements is limited and materials possess acceptable mechanical properties.
4. the possibility for structural failure of individual components of the sealing system;	4. State of stress from forces expected from rock creep and other mechanical loads is favorable for seal materials.
5. subsidence of the ground surface in the vicinity of the shafts and the possibility of accidental entry after sealing;	5. The shaft is completely filled with low-porosity materials, and construction equipment would be needed to gain entry.
6. the need to develop new technologies or materials for construction of the shaft sealing system.	6. Construction of the shaft sealing system is feasible using available technologies and materials.

3

## 4. Design Description

### 4.1 Introduction

The design presented in this section was developed based on (1) the design guidance outlined in Section 3.0, (2) past design experience, and (3) a desire to reduce uncertainties associated with the performance of the WIPP sealing system. The WIPP shaft sealing system design has evolved over the past decade from the initial concepts presented by Stormont (1984) to the design concepts presented in this document. The past designs are:

- the plugging and sealing program for the WIPP (Stormont, 1984),
- the initial reference seal system design (Nowak et al., 1990),
- the seal design alternative study (Van Sambeek et al., 1993),
- the WIPP sealing system design (DOE, 1995).

The present design changes were implemented to take advantage of knowledge gained from small-scale seals tests conducted at the WIPP (Knowles and Howard, 1996), advances in the ability to predict the time-dependent mechanical behavior of compacted salt rock (Callahan et al., 1996), large-scale dynamic salt compaction tests and associated laboratory determination of the permeability of compacted salt samples (Hansen and Ahrens, 1996; Brodsky et al., 1996), field tests to measure the permeability of the DRZ surrounding the WIPP AIS (Dale and Hurtado, 1996), and around seals (Knowles et al., 1996). A summary paper (Hansen et al., 1996) describing the design has been prepared.

The shaft sealing system is composed of seals within the Salado Formation, the Rustler Formation, and the Dewey Lake Redbeds and overlying units. All components of the sealing system are designed to meet Items 3, 4, and 6 of the Design Guidance (Table G2-7.); that is, all sealing system components are designed to be chemically and mechanically compatible with the seal environment, structurally adequate, and constructable using currently available technology and materials. The seals in the Salado Formation are also designed to meet Items 1 and 2 of the Design Guidance. These seals will limit fluid migration upward from the repository to the Rustler Formation and downward from the Rustler Formation to the repository. Migration of brine upward and downward is discussed in Sections 8.5 and 8.4 respectively. The seals in the Rustler Formation are designed to meet Item 2 in addition to Items 3, 4, and 6 of the Design Guidance. The seals in the Rustler Formation limit migration of Rustler brines into the shaft cross-section and also limit cross-flow between the Culebra and Magenta members. The principal function of the seals in the Dewey Lake Redbeds and overlying units is to meet Item 5 of the Design Guidance, that is, to limit subsidence of the ground surface in the vicinity of the shafts and to prevent accidental entry after repository closure. Entry of water (surface water and any groundwater that might be present in the Dewey Lake Redbeds and overlying units) into the sealing system is limited by restraining subsidence and by placing high density fill in the shafts.

### 4.2 Existing Shafts

The WIPP underground facilities are accessed by four shafts commonly referred to as the Waste, Air Intake, Exhaust, and Salt Handling Shafts. These shafts were constructed between 1981 and 1988. All four shafts are lined from the surface to just below the contact of the Rustler and Salado Formations. The lined portion of the shafts terminates in a substantial concrete structure called the "key," which is located in the uppermost portion of the Salado Formation.

1 Drawings showing the configuration of the existing shafts are included in Appendix G2-E and  
 2 listed below in Table G2-8. Table G2-9 contains a summary of information describing the  
 3 existing shafts.

4 The upper portions of the WIPP shafts are lined. The Waste, Air Intake, and Exhaust shafts  
 5 have concrete linings; the Salt Handling Shaft has a steel lining with grout backing. In addition,  
 6 during shaft construction, steel liner plates, wire mesh, and pressure grouting were used to  
 7 stabilize portions of the shaft walls in the Rustler Formation and overlying units. Seepage of  
 8 groundwater into the lined portions of the shafts has been observed. This seepage was  
 9 expected; in fact, the shaft keys (massive concrete structures located at the base of each shaft  
 10 liner) were designed to collect the seepage and transport it through a piping system to collection  
 11 points at the repository horizon. In general, the seepage originates in the Magenta and Culebra  
 12 members of the Rustler Formation and in the interface zone between the Rustler and Salado  
 13 formations. It flows along the interface between the shaft liner and the shaft wall and through the  
 14 DRZ immediately adjacent to the shaft wall. In those cases where seepage through the liner  
 15 occurred, it happened where the liner offered lower resistance to flow than the interface and  
 16 DRZ, for example, at construction joints. Maintenance grouting, in selected areas of the WIPP  
 17 shafts, has been utilized to reduce seepage.

18 **Table G2-8**  
 19 **Drawings Showing Configuration of Existing WIPP Shafts (Drawings are in Appendix G2-E)**

Shaft	Drawing Title	Sheet Number of Drawing SNL-007
Waste	Near-Surface/Rustler Formation Waste Shaft Stratigraphy & As-Built Elements	2 of 28
Waste	Salado Formation Waste Shaft Stratigraphy & As-Built Elements	3 of 28
AIS	Near-Surface/Rustler Formation Air Intake Shaft Stratigraphy & As-Built Elements	7 of 28
AIS	Salado Formation Air Intake Shaft Stratigraphy & As-Built Elements	8 of 28
Exhaust	Near-Surface/Rustler Formation Exhaust Shaft Stratigraphy & As-Built Elements	12 of 28
Exhaust	Salado Formation Exhaust Shaft Stratigraphy & As-Built Elements	13 of 28
Salt Handling	Near-Surface/Rustler Formation Salt Handling Shaft Stratigraphy & As-Built Elements	17 of 28
Salt Handling	Salado Formation Salt Handling Shaft Stratigraphy & As-Built Elements	18 of 28

1  
2

**Table G2-9  
 Summary of Information Describing Existing WIPP Shafts**

	Shafts			
	Salt Handling	Waste	Air Intake	Exhaust
<b>A. Construction Method</b>				
i. Sinking method	Blind bored	Initial 6' pilot hole slashed by drill & blast (smooth wall blasting)	Raise bored	Initial 6' pilot hole slashed by drill & blast (smooth wall blasting)
ii. Dates of shaft sinking	7/81-10/81	Drilled 12/81-2/82 Slashed 10/83-6/84	12/87-8/88	9/83-11/84
iii. Ground treatment in water-bearing zone	Grout behind steel liner during construction	Grouted 1984 & 1988	Grouted 1993	Grouted 1985, 1986, & 1987
iv. Sump construction	Drill & blast	Drill & blast	No sump	No sump
<b>B. Upper Portion of Shaft *</b>				
i. Type of liner	Steel	Concrete	Concrete	Concrete
ii. Lining diameter (ID)	10'-0"	19'-0"	18'-0"/16'-7"	14'-0"
iii. Excavated diameter	11'-10"	20'-8" to 22'-4"	20'-3"	15'-8" to 16'-8"
iv. Installed depth of liner	838.5'	812'	816'	846'
<b>C. Key Portion of Shaft *</b>				
i. Construction material	Reinf. conc. w/chem. seals	Reinf. concrete w/chem. seals	Reinf. concrete w/chem. seals	Reinf. concrete w/chem. seals
ii. Liner diameter (ID)	10'-0"	19'-0"	16'-7"	14'-0"
iii. Excavated diameter	15'-0" to 18'-0"	27'-6" to 31'-0"	29'-3" to 35'-3"	21'-0" to 26'-0"
iv. Depth-top of Key	844'	836'	834'	846'
v. Depth-bottom of Key	883'	900'	897'	910'
vi. Dow Seal #1 depth	846' to 848'	846' to 849'	839' to 842'	853' to 856'
vii. Dow Seal #2 depth	853' to 856'	856' to 859'	854' to 857'	867' to 870'
viii. Dow Seal #3 depth	868 to 891'	NA	NA	NA
ix. Top of salt (Rustler/Salado contact)	851'	843'	841'	853'

	Shafts			
	Salt Handling	Waste	Air Intake	Exhaust
D. <u>Lower Shaft (Unlined)</u> *				
i. Type of support	Unlined	Chain link mesh	Unlined	Chain link mesh
ii. Excavated diameter	11'-10"	20'-0"	20'-3"	15'-0"
iii. Depth-top of "unlined"	882'	900'	904'	913'
iv. Depth-bottom of "unlined"	2144'	2142'	2128'	2148'
E. <u>Station</u> *				
i. Type of support	Wire mesh		Wire mesh	Wire mesh
ii. Principal dimensions	21H x 31W	12H x 30W	25H x 36W	12H x 23W
iii. Depth-top of station	2144'	2142'	2128'	2148'
iv. Depth-floor of station	2162'	2160'	2150'	2160'
F. <u>Sump</u> *				
Depth-top of sump	2162'	2160'	No sump	No sump
Depth-bottom of sump	2272'	2286'		
G. <u>Shaft Duty</u>	Construction hoisting of excavated salt; personnel hoisting; for intake (fresh) air; in some cases, unfiltered exhaust shaft to ventilate areas of the underground that do not need filtration	Hoisting shaft for lowering waste containers; personnel hoisting until waste receipt	Ventilation shaft for intake (fresh) air; personnel hoisting	Exhaust air ventilation shaft

\*This information is from the MOC drawings identified on Sheets 2, 3, 7, 8, 12, 13, 17, and 18 of Drawing SNL-007 (see Appendix G2-E).



### 4.3 Sealing System Design Description

This section describes the shaft sealing system design, components, and functions. The shaft sealing system consists of three essentially independent parts:

1. The seals in the Salado Formation provide the primary regulatory barrier. They will limit fluid flow into and out of the repository throughout the 10,000-year regulatory period.
2. The seals in the Rustler Formation will limit flow from the water-bearing members of the Rustler Formation and limit commingling of Magenta and Culebra groundwaters.
3. The seals in the Dewey Lake Redbeds and the near-surface units will limit infiltration of surface water and preclude accidental entry through the shaft openings.

The same sealing system is used in all four shafts. Therefore an understanding of the sealing system for one shaft is sufficient to understand the sealing system in all shafts. Only minor differences exist in the lengths of the components, and the component diameters differ to accommodate the existing shaft diameters.

The shaft liner will be removed in four locations in each shaft. All of these locations are within the Rustler Formation. Additionally, the upper portion of each shaft key will be eliminated. The portion of the shaft key that will be eliminated spans the Rustler/Salado interface and extends into the Salado Formation. The shaft liner removal locations are

1. from 10 ft above the Magenta Member to the base of the Magenta (removal distances vary from 34–39 ft because of different member thickness at shaft locations),
2. for a distance of 10 ft in the anhydrite of the Tamarisk Member,
3. through the full height of the Culebra (17–24 ft), and
4. from the top anhydrite unit in the unnamed lower member to the top of the key (67–85 ft).

Additionally, the concrete will be removed from the top of the key to the bottom of the key's lower chemical seal ring (23 to 29 ft). Drawing SNL-007, Sheets 4, 9, 14, and 19 in Appendix G2-E show shaft liner removal plans, and Sheet 23 shows key removal plans.

The decision to abandon portions of the shaft lining and key in place is based on two factors. First, no improvements in the performance of the sealing system associated with removal of these isolated sections of concrete have been identified. Second, because the keys are thick and heavily reinforced, their removal would be costly and time consuming. No technical problems are associated with the removal of this concrete; thus, if necessary, its removal can be incorporated in any future design.

The DRZ will be pressure grouted throughout the liner and key removal areas and for a distance of 10 ft above and below all liner removal areas. The pressure grouting will stabilize the DRZ during liner removal and shaft sealing operations. The grouting will also control groundwater seepage during and after liner removal. The pressure grouting of the DRZ has not been

1 assigned a sealing function beyond the construction period. It is likely that this grout will seal the  
2 DRZ for an extended period of time. However, past experience with grout in the mining and  
3 tunneling industries demonstrates that groundwater eventually opens alternative pathways  
4 through the media and reestablishes seepage patterns (maintenance grouting is common in  
5 both mines and tunnels). Therefore, post-closure sealing of the DRZ in the Rustler Formation  
6 has not been assumed in the design.

7 The compacted clay sealing material (bentonite) will seal the shaft cross-section in the Rustler  
8 Formation. In those areas where the shaft liner has been removed, the compacted clay will  
9 confine the vertical movement of groundwater in the Rustler to the DRZ. Sealing the shaft DRZ  
10 is accomplished in the Salado Formation. It is achieved initially through the interruption of the  
11 halite DRZ by concrete-asphalt waterstops and on a long-term basis through the natural  
12 process of healing the halite DRZ. The properties of the compacted clay are discussed in  
13 Section 5.3.2. The concrete-asphalt waterstops and DRZ healing in the Salado are discussed in  
14 Sections 7.6.1 and 7.5.2 respectively.

15 Reduction of the uncertainty associated with long-term performance is addressed by replacing  
16 the upper and lower Salado Formation salt columns used in some of the earlier designs with  
17 compacted clay columns and by adding asphalt sealing components in the Salado Formation.  
18 Use of disparate materials for sealing components reduces the uncertainty associated with a  
19 common-mode failure.

20 The compacted salt column provides a seal with an initial permeability several orders of  
21 magnitude higher than the clay or asphalt columns; however, its long-term properties will  
22 approach those of the host rock. The permeability of the compacted salt, after consolidation, will  
23 be several orders of magnitude lower than that of the clay and comparable to that of the asphalt.  
24 The clay provides seals of known low permeability at emplacement, and asphalt provides an  
25 independent low permeability seal of the shaft cross-section and the shaft wall interface at the  
26 time of installation. Sealing of the DRZ in the Rustler Formation during the construction period is  
27 accomplished by grouting, and initial sealing of the DRZ in the Salado Formation is  
28 accomplished by three concrete-asphalt waterstops.

29 In the following sections, each component of each of the three shaft segments is identified by  
30 name and component number (see Figure G2-5 for nomenclature). Associated drawings in  
31 Appendix G2-E are also identified. Drawings showing the overall system configurations for each  
32 shaft are listed in Table G2-10.

### 33 **4.3.1 Salado Seals**

34 The seals placed in the Salado Formation are composed of (1) consolidated salt, clay, and  
35 asphalt components that will function for very long periods, exceeding the 10,000-year  
36 regulatory period; and (2) salt saturated concrete components that will function for extended  
37 periods. The specific components that comprise the Salado seals are described below.

#### 38 **4.3.1.1 Compacted Salt Column**

39 The compacted salt column (Component 10 in Figure G2-5, and shown in Drawing SNL-007,  
40 Sheet 25) will be constructed of crushed salt taken from the Salado Formation. The length of the  
41 salt column varies from 170 to 172 m (556 to 564 ft) in the four shafts. The compacted salt  
42 column is sized to allow the column and concrete-asphalt waterstops at either end to be placed

1 between the Vaca Triste Unit and Marker Bed 136. The salt will be placed and compacted to a  
 2 density approaching 90% of the average density of intact Salado salt. The effects of creep  
 3 closure will cause this density to increase with time, further reducing permeability.

4 The salt column will offer limited resistance to fluid migration immediately after emplacement,  
 5 but it will become less permeable as creep closure further compacts the salt. Salt creep  
 6 increases rapidly with depth; therefore, at any time, creep closure of the shaft will be greater at  
 7 greater depth. The location and initial compaction density of the compacted salt column were  
 8 chosen to assure consolidation of the compacted salt column in the 100 years following  
 9 repository closure. The state of salt consolidation, results of analyses predicting the creep  
 10 closure of the shaft, consolidation and healing of the compacted salt, and healing of the DRZ  
 11 surrounding the compacted salt column are presented in Sections 7.5 and 8.4 of this document.  
 12 These results indicate that the salt column will become an effective long-term barrier within 100  
 13 years.

14 **Table G2-10**  
 15 **Drawings Showing the Sealing System for Each Shaft (Drawings are in Appendix G2-E)**

Shaft	Drawing Title	Sheet Number of Drawing SNL 007
Waste	Near-Surface/Rustler Formation Waste Shaft Stratigraphy & Sealing Subsystem Profile	4 of 28
Waste	Salado Formation Waste Shaft Stratigraphy & Sealing Subsystem Profile	5 of 28
AIS	Near-Surface/Rustler Formation Air Intake Shaft Stratigraphy & Sealing Subsystem Profile	9 of 28
AIS	Salado Formation Air Intake Shaft Stratigraphy & Sealing Subsystem Profile	10 of 28
Exhaust	Near-Surface/Rustler Formation Exhaust Shaft Stratigraphy & Sealing Subsystem Profile	14 of 28
Exhaust	Salado Formation Exhaust Shaft Stratigraphy & Sealing Subsystem Profile	15 of 28
Salt Handling	Near-Surface/Rustler Formation Salt Handling Shaft Stratigraphy & Sealing Subsystem Profile	19 of 28
Salt Handling	Salado Formation Salt Handling Shaft Stratigraphy & Sealing Subsystem Profile	20 of 28

16 4.3.1.2 Upper and Lower Salado Compacted Clay Columns

17 The upper and lower Salado compacted clay columns (Components 8 and 12 respectively in  
 18 Figure G2-5) are shown in detail on Drawing SNL-007, Sheet 24. A commercial well-sealing  
 19 grade sodium bentonite will be used to construct the upper and lower Salado clay columns.  
 20 These clay columns will effectively limit fluid movement from the time they are placed and will  
 21 provide an effective barrier to fluid migration throughout the 10,000-year regulatory period and  
 22 thereafter. The upper clay column ranges in length from 102 to 107 m (335 to 351 ft), and the  
 23 lower clay column ranges in length from 29 to 33 m (94 to 107 ft) in the four shafts. The  
 24 locations for the upper and lower clay columns were selected based on the need to limit fluid  
 25 migration into the compacting salt column. The lower clay column stiffness is sufficient to

1 promote early healing of the DRZ, thus removing the DRZ as a potential pathway for fluids  
2 (Appendix D in the Compliance Submittal Design Report (Sandia, 1996), Section 5.2.1).

#### 3 4.3.1.3 Upper, Middle, and Lower Concrete-Asphalt Waterstops

4 The upper, middle, and lower concrete-asphalt waterstops (Components 7, 9, and 11  
5 respectively in Figure G2-5) are identical and are composed of three elements: an upper  
6 concrete plug, a central asphalt waterstop, and a lower concrete plug. These components are  
7 also shown on Drawing SNL-007, Sheet 22. The concrete specified is a specially developed  
8 salt-saturated concrete called Salado Mass Concrete (**SMC**). In all cases the component's  
9 overall design length is 15 m (50 ft).

10 The upper and lower concrete plugs of the concrete-asphalt waterstop are identical. They fill the  
11 shaft cross-section and have a design length of 7 m (23 ft). The plugs are keyed into the shaft  
12 wall to provide positive support for the plug and overlying sealing materials. The interface  
13 between the concrete plugs and the surrounding formation will be pressure grouted. The upper  
14 plug in each component will support dynamic compaction of the overlying sealing material if  
15 compaction is specified. Dynamic compaction of the salt column is discussed in Section 6.

16 The asphalt waterstop is located between the upper and lower concrete plugs. In all cases a  
17 kerf extending one shaft radius beyond the shaft wall is cut in the surrounding salt to contain the  
18 waterstop. The kerf is 0.3 m (1 ft) high at its edge and 0.6 m (2 ft) high at the shaft wall. The  
19 kerf, which cuts through the existing shaft DRZ, will result in the formation of a new DRZ along  
20 its perimeter. This new DRZ will heal shortly after construction of the waterstop, and thereafter  
21 the waterstop will provide a very low permeability barrier to fluid migration through the DRZ. The  
22 formation and healing of the DRZ around the waterstop are addressed in Section 7.6.1. The  
23 asphalt fill for the waterstop extends two feet above the top of the kerf to assure complete filling  
24 of the kerf. The construction procedure used assures that shrinkage of the asphalt from cooling  
25 will not result in the creation of voids within the kerf and will minimize the size of any void below  
26 the upper plug.

27 Concrete-asphalt waterstops are placed at the top of the upper clay column, the top of the  
28 compacted salt column, and the top of the lower clay column. The concrete-asphalt waterstops  
29 provide independent seals of the shaft cross-section and the DRZ. The SMC plugs (and grout)  
30 will fill irregularities in the shaft wall, bond to the shaft wall, and seal the interface. Salt creep  
31 against the rigid concrete components will place a compressive load on the salt and promote  
32 early healing of the salt DRZ surrounding the SMC plugs. The asphalt waterstop will seal the  
33 shaft cross-section and the DRZ.

34 The position of the concrete components was first determined by the location of the salt and  
35 clay columns. The components were then moved upward or downward from their initial design  
36 location to assure the components were located in regions where halite was predominant. This  
37 positioning, coupled with variations in stratigraphy, is responsible for the variations in the  
38 lengths of the salt and clay columns.

#### 39 4.3.1.4 Asphalt Column

40 An asphalt-aggregate mixture is specified for the asphalt column (Component 6 in Figure G2-5).  
41 This column is 42 to 44 m (138 to 143 ft) in length in the four shafts, as shown in Drawing SNL-  
42 007, Sheet 23. The asphalt column is located above the upper concrete-asphalt waterstop; it

1 extends approximately 5 m (16 ft) above the Rustler/Salado interface. A 6-m (20-ft) long  
 2 concrete plug (part of the Rustler seals) is located just above the asphalt column.

3 The existing shaft linings will be removed from a point well above the top of the asphalt column  
 4 to the top of the shaft keys. The concrete shaft keys will be removed to a point just below the  
 5 lowest chemical seal ring in each key. The asphalt column is located at the top of the Salado  
 6 Formation and provides an essentially impermeable seal for the shaft cross section and along  
 7 the shaft wall interface. The length of the asphalt column will decrease slightly as the column  
 8 cools. The procedure for placing the flowable asphalt-aggregate mixture is described in  
 9 Section 6.

10 **4.3.1.5 Shaft Station Monolith**

11 A shaft station monolith (Component 13) is located at the base of the each shaft. Because the  
 12 configurations of each shaft differ, drawings of the shaft station monoliths for each shaft were  
 13 prepared. These drawings are identified in Table G2-11. The shaft station monoliths will be  
 14 constructed with SMC. The monoliths function to support the shaft wall and adjacent drift roof,  
 15 thus preventing damage to the seal system as the access drift closes from natural processes.

16 **Table G2-11**  
 17 **Drawings Showing the Shaft Station Monoliths (Drawings are in Appendix G2-E)**

Shaft	Drawing Title	Sheet Number of Drawing SNL-007
Waste	Waste Shaft Shaft Station Monolith	6 of 28
AIS	Air Intake Shaft Shaft Station Monolith	11 of 28
Exhaust	Exhaust Shaft Shaft Station Monolith	16 of 28
Salt Handling	Salt Handling Shaft Shaft Station Monolith	21 of 28

18 **4.3.2 Rustler Seals**

19 The seals in the Rustler Formation are composed of the Rustler compacted clay column and a  
 20 concrete plug. The concrete plug rests on top of the asphalt column of the Salado seals. The  
 21 clay column extends from the concrete plug through most of the Rustler Formation and  
 22 terminates above the Rustler’s highest water-bearing zone in the Forty-niner Member.

23 **4.3.2.1 Rustler Compacted Clay Column**

24 The Rustler compacted clay column (Component 4 in Figure G2-5) is shown on Drawing SNL-  
 25 007, Sheet 27 for each of the four shafts. A commercial well-sealing-grade sodium bentonite will  
 26 be used to construct the Rustler clay column, which will effectively limit fluid movement from the  
 27 time of placement and provide an effective barrier to fluid migration throughout the 10,000-year  
 28 regulatory period and thereafter. Design length of the Rustler clay column is about 71 m (234 to  
 29 235 ft) in the four shafts.

30 The location for the Rustler clay columns was selected to limit fluid migration into the shaft  
 31 cross-section and along the shaft wall interface and to limit mixing of Culebra and Magenta  
 32 waters. The clay column extends from above the Magenta Member to below the Culebra

1 Member of the Rustler Formation. The Magenta and Culebra are the water-bearing units of the  
2 Rustler. The members above the Magenta (the Forty-niner), between the Magenta and Culebra  
3 (the Tamarisk), and below the Culebra (the unnamed lower member) are aquitards in the vicinity  
4 of the WIPP shafts.

#### 5 4.3.2.2 Rustler Concrete Plug

6 The Rustler concrete plug (Component 5 in Figure G2-5) is constructed of SMC. The plugs for  
7 the four shafts are shown on Drawing SNL-007, Sheet 26. The plug is 6 m (20 ft) long and will  
8 fill the shaft cross-section. The plug is placed directly on top of the asphalt column of the Salado  
9 seals. The plug will be keyed into the surrounding rock and grouted. The plug permits work to  
10 begin on the overlying clay column before the asphalt has completely cooled. The option of  
11 constructing the overlying clay columns using dynamic compaction (present planning calls for  
12 construction using compressed clay blocks) is also maintained by keying the plug into the  
13 surrounding rock.

#### 14 4.3.3 Near-Surface Seals

15 The near-surface region is composed of dune sand, the Mescalero caliche, the Gatuña  
16 Formation, the Santa Rosa Formation, and the Dewey Lake Redbeds. This region extends from  
17 the ground surface to the top of the Rustler Formation—a distance of about 160 m (525 ft). All  
18 but about 15 m (50 ft) of this distance is composed of the Dewey Lake Redbeds Formation. The  
19 near-surface seals are composed of two earthen fill columns and a concrete plug. The upper  
20 earthen fill column (Component 1) extends from the shaft collar through the surficial deposits  
21 downward to the top of the Dewey Lake Redbeds. The concrete plug (Component 2) is placed  
22 in the top portion of the Dewey Lake Redbeds, and the lower earthen fill column (Component 3)  
23 extends from the concrete plug into the Rustler Formation. These components are shown on  
24 Drawing SNL-007, Sheet 28.

25 This seal will limit the amount of surface water entering the shafts and will limit the potential for  
26 any future groundwater migration into the shafts. The near surface seals will also completely  
27 close the shafts and prevent accidental entry and excessive subsidence in the vicinity of the  
28 shafts. As discussed in Section 4.3.2, the existing shaft linings will be abandoned in place  
29 throughout the near-surface region.

#### 30 4.3.3.1 Near-Surface Upper Compacted Earthen Fill

31 This component (Component 1 in Figure G2-5) will be constructed using locally available fill.  
32 The fill will be compacted to a density near that of the surrounding material to inhibit the  
33 migration of surface waters into the shaft cross-section. The length of this column varies from 17  
34 to 28 m (56 to 92 ft) in the four shafts. In all cases, this portion of the WIPP sealing system may  
35 be modified as required to facilitate decommissioning of the WIPP surface facilities.

#### 36 4.3.3.2 Near-Surface Concrete Plug

37 Current plans call for an SMC plug (Component 2 in Figure G2-5). However, freshwater  
38 concrete may be used if found to be desirable at a future time, and if approved by NMED  
39 through the Permit modification process specified in 20.4.1.900 NMAC (incorporating 40 CFR  
40 §270.42). The plug extends 12 m (40 ft) downward from the top of the Dewey Lake Redbeds. It  
41 is placed inside the existing shaft lining, and the interface is grouted.

1 4.3.3.3 Near-Surface Lower Compacted Earthen Fill

2 This component (Component 3 in Figure G2-5) will be constructed using locally available fill,  
3 which will be placed using dynamic compaction (the same method used to construct the salt  
4 column). The fill will be compacted to a density equal to or greater than the surrounding  
5 materials to inhibit the migration of surface waters into the shaft cross-section. The length of this  
6 column varies from 136 to 148 m (447 to 486 ft) in the four shafts.

7



## 5. Material Specification

Appendix G2-A provides a body of technical information for each of the WIPP shaft seal materials. The materials specification characterizes each seal material, establishes the adequacy of its function, states briefly the method of component placement, and quantifies expected characteristics (particularly permeability) pertinent to a WIPP-specific shaft seal design. The goal of the materials specifications is to substantiate why materials used in this seal system design will limit fluid flow within the shafts and thereby limit releases of hazardous constituents from the WIPP site at the regulatory boundary.

This section summarizes materials characteristics for shaft seal system components designed for the WIPP. The shaft seal system will not be constructed for decades; however, if it were to be constructed in the near term, materials specified could be placed in the shaft and meet performance specifications using current materials and construction techniques. Construction methods are described in Appendix G2-B. Materials specifications and construction specifications are not to be construed as the only materials or methods that would suffice to seal the shafts effectively. Undoubtedly, the design will be modified, perhaps simplified, and construction alternatives may prove to be advantageous during the years before seal construction proceeds. Nonetheless, a materials specification is necessary to establish a frame of reference for shaft seal design and analysis, to guide construction specifications, and to provide a basis for seal material parameters.

Design detail and other characteristics of the geologic, hydrologic, and chemical setting are provided in the text, appendices, and references. The four shafts will be entirely filled with dense materials possessing low permeability and other desirable engineering and economic attributes. Seal materials include concrete, clay, asphalt, and compacted salt. Other construction and fill materials include cementitious grout and earthen fill. Concrete, clay, and asphalt are common construction materials used extensively in sealing applications. Their descriptions, drawn from literature and site-specific references, are given in Appendix G2-A. Compaction and natural reconsolidation of crushed salt are uniquely applied here. Therefore, crushed salt specification includes discussion of constitutive behavior and sealing performance, specific to WIPP applications. Cementitious grout is also specified in some detail. Only rudimentary discussion of earthen fill is given here and in Appendices A and B. Specifications for each material are discussed in the following order:

- functions,
- material characteristics,
- construction,
- performance requirements,
- verification methods.

Seal system components are materials possessing high durability and compatibility with the host rock. The system contains functional redundancy and uses differing materials to reduce uncertainty in performance. All materials used in the shaft seal system are expected to maintain their integrity for very long periods. Some sealing components reduce fluid flow soon after placement while other components are designed to function well beyond the regulatory period.



## 5.1 Longevity

A major environmental advantage of the WIPP locale is an overall lack of groundwater to seal against. Even though very little regional water is present in the geologic setting, the seal system reflects great concern for groundwater's potential influence on the shaft seal system. If the hydrologic system sustained considerable fluid flow, brine geochemistry could impact engineered materials. Brine would not chemically change the compacted salt column, but mechanical effects of pore pressure are of concern to reconsolidation. The geochemical setting, as further discussed in Section 2.4, will have little influence on concrete, asphalt, and clay shaft seal materials. Each material is durable because the potential for degradation or alteration is very low.

Materials used to form the shaft seals are the same as those identified in the scientific and engineering literature as appropriate for sealing deep geologic repositories for radioactive wastes. Durability or longevity of seal components is a primary concern for any long-term isolation system. Issues of possible degradation have been studied throughout the international community and within waste isolation programs in the USA. Specific degradation studies are not detailed in this document because longevity is one of the over-riding attributes of the materials selected and degradation is not perceived to be likely. However, it is acknowledged here that microbial degradation, seal material interaction, mineral transformation, such as silicification of bentonite, and effects of a thermal pulse from asphalt or hydrating concrete are areas of continuing investigations.

Among longevity concerns, degradation of concrete is the most recognized. At this stage of the design, it is established that only small volumes of brine ever reach the concrete elements (see Section C4 of the Compliance Submittal Design Report (Sandia, 1996)). Further analysis concerned with borehole plugging using cementitious materials shows that at least 100 pore volumes of brine in an open system would be needed to begin degradation processes. In a closed system, such as the hydrologic setting in the WIPP shafts, phase transformations create a degradation product of increased volume. Net volume increase owing to phase transformation in the absence of mass transport would decrease rather than increase permeability of concrete seal elements.

Asphalt has existed for thousands of years as natural seeps. Longevity studies specific to DOE's Hanford site have utilized asphalt artifacts buried in ancient ceremonies to assess long-term stability (Wing and Gee, 1994). Asphalt used as a seal component deep in the shaft will inhabit a benign environment, devoid of ultraviolet light or an oxidizing atmosphere. Additional assurance against possible microbial degradation in asphalt elements is provided with addition of lime. For these reasons, it is believed that asphalt components will possess their design characteristics well beyond the regulatory period.

Natural bentonite is a stable material that generally will not change significantly over a period of ten thousand years. Bentonitic clays have been widely used in field and laboratory experiments concerned with radioactive waste disposal. As noted by Gray (1993), three internal mechanisms, illitization, silicification and charge change, could affect sealing properties of bentonite. Illitization and silicification are thermally driven processes and, following discussion by Gray (1993), are not possible in the environment or time-frame of concern at the WIPP. The naturally occurring Wyoming bentonite which is the specified material for the WIPP shaft seal is well over a million years old. It is, therefore, highly unlikely that the metamorphism of bentonite enters as a design concern.

## 5.2 Materials

### 5.2.1 Mass Concrete

Concrete has low permeability and is widely used for hydraulic applications. The specification for mass concrete presents a special design mixture of a salt-saturated concrete called Salado Mass Concrete (SMC). Performance of SMC and similar salt-saturated mixtures has been established through analogous industrial applications and in laboratory and field testing. The documentation substantiates adequacy of SMC for concrete applications within the WIPP shafts.

The function of the concrete is to provide durable components with small void volume, adequate structural compressive strength, and low permeability. SMC is used as massive plugs, a monolith at the base of each shaft, and in tandem with asphalt waterstops. Concrete is a rigid material that will support overlying seal components while promoting natural healing processes within the salt DRZ. Concrete is one of the redundant components that protects the reconsolidating salt column. The salt column will achieve low permeabilities in fewer than 100 years, and concrete will no longer be needed at that time. However, concrete will continue to provide good sealing characteristics for a very long time.

Salt-saturated concrete contains sufficient salt as an aggregate to saturate hydration water with respect to NaCl. Salt-saturated concrete is required for all uses within the Salado Formation because fresh water concrete would dissolve part of the host rock. The concrete specified for the shaft seal system has been tailored for the service environment and includes all the engineering properties of high quality concrete, as described in Appendix G2-A. Among these are low heat of hydration, high compressive strength, and low permeability. Because SMC provides material characteristics of high-performance concrete, it will likely be the concrete of choice for all seal applications at the WIPP.

Construction involves surface preparation and slickline placement. A batching and mixing operation on the surface will produce a wet mixture having low initial temperatures. Placement uses a tremie line, where the fresh concrete exits the slickline below the surface level of the concrete being placed. Placed in this manner, the SMC will have low porosity (about 5%) with or without vibration. Tremie line placement is a standard construction method in mining operations.

Specifications of concrete properties include mixture proportions and characteristics before and after hydration. SMC strength is much greater than required for shaft seal elements, and the state of stress within the shafts is compressional with little shear stress developing. Volume stability of the SMC is also excellent; this, combined with salt-saturation, assures a good bond with the salt. Permeability of SMC is very low, consistent with most concrete (Pfeifle et al., 1996). Because of a favorable state of stress and isothermal conditions, the SMC will remain intact. Because little brine is available to alter concrete elements, minimal degradation is possible. These favorable attributes combine to assure concrete elements within the Salado will remain structurally sound and possess very low permeability (between  $2 \times 10^{-21}$  and  $1 \times 10^{-17}$  m<sup>2</sup>) for exceedingly long periods. A permeability distribution function and associated discussion are given in Appendix G2-A.

Standard ASTM specifications are made for the green and hydrated concrete properties. Quality control and a history of successful use in both civil construction and mining applications assure proper placement and performance.

## 5.2.2 Compacted Clay

Compacted clays are commonly proposed as primary sealing materials for nuclear waste repositories and have been extensively investigated against rigorous performance requirements. Advantages of clays for sealing purposes include low permeability, demonstrated longevity in many types of natural environments, deformability, sorptive capacity, and demonstrated successful utilization in practice for a variety of sealing purposes.

Compacted clay as a shaft sealing component functions as a barrier to brine flow and possibly to gas flow (see alternative construction methods in Appendix G2-B). Compacted bentonitic clay can generate swelling pressure and clays have sufficient rigidity to promote healing of any DRZ in the salt. Wetted swelling clay will seal fractures as it expands into available space and will ensure tightness between the clay seal component and the shaft walls.

The Rustler and Salado compacted clay columns are specified to be constructed of dense sodium bentonite blocks. An extensive experimental data base exists for the permeability of sodium bentonites under a variety of conditions. Many other properties of sodium bentonite, such as strength, stiffness, and chemical stability, are established. Bentonitic clays heal when fractured and can penetrate small fractures or irregularities in the host rock. Further, bentonite is stable in the seal environment. These properties, noted by international waste isolation programs, make bentonite a widely accepted seal material.

From the bottom clay component to the top earthen fill, different methods will be used to place clay materials in the shaft. Seal performance within the Salado Formation is far more important to regulatory compliance of the seal system than is performance of clay and earthen fill in the overlying formations. Therefore, more time and effort will be expended on placement of Salado clay components. Three potential construction methods could be used to place clay in the shaft, as discussed in Appendix G2-B: compacted blocks, vibratory roller, and dynamic compaction. Construction of Salado clay components specifies block assembly.

Required sealing performance of compacted clay elements varies with location. For example, Component 4 provides separation of water-bearing zones, while the lowest clay column (Component 12) limits fluid flow to the reconsolidating salt column. If liquid saturation in the clay column of 85% can be achieved, it would serve as a gas barrier. In addition, compacted clay seal components promote healing of the salt DRZ. To achieve low permeabilities, the dry density of the emplaced bentonite should be about 1.8 g/cm<sup>3</sup>. A permeability distribution function for performance assessment and the logic for its selection are given in Appendix G2-A.

Verification of specified properties such as density, moisture content, permeability, or strength of compacted clay seals can be determined by direct measurement during construction. However, indirect methods are preferred because certain measurements, such as permeability, are likely to be time consuming and invasive. Methods used to verify the quality of emplaced seals will include quality of block production and field measurements of density.

## 5.2.3 Asphalt

Asphalt is used to prevent water migration down the shaft in two ways: as an asphalt column near the Rustler/Salado contact and as a “waterstop” sandwiched between concrete plugs at three locations within the Salado Formation. Asphalt components of the WIPP seal design add assurance that minimal transport of brine down the sealed shaft will occur.

1 Asphalt is a widely used construction material because of its many desirable engineering  
2 properties. Asphalt is a strong cement, readily adhesive, highly waterproof, and durable.  
3 Furthermore, it is a plastic substance that is readily mixed with mineral aggregates. A range of  
4 viscosity is achievable for asphalt mixtures. It is highly resistant to most acids, salts, and alkalis.  
5 These properties are well suited to the requirements of the WIPP shaft seal system.

6 Construction of the seal components containing asphalt can be accomplished using a slickline  
7 process where low-viscosity heated material is effectively pumped into the shaft. The  
8 technology to apply the asphalt in this manner is available as described in the construction  
9 procedures in Appendix G2-B.

10 The asphalt components are required to endure for about 100 years and limit brine flow down  
11 the shaft to the compacted salt component. Since asphalt will not be subjected to ultraviolet light  
12 or an oxidizing environment, it is expected to provide an effective seal for centuries. Air voids  
13 less than 2% ensure low permeability. The permeability of the massive asphalt column is  
14 expected to have an upper limit  $1 \times 10^{-18} \text{ m}^2$ .

15 Sufficient construction practice and laboratory testing information is available to assure  
16 performance of the asphalt component. Laboratory validation tests to optimize viscosity may be  
17 desirable before final installation specifications are prepared. In general, verification tests would  
18 add quantitative documentation to expected performance values and have direct application to  
19 WIPP.

#### 20 **5.2.4 Compacted Salt Column**

21 A reconsolidated column of natural WIPP salt will seal the shafts permanently. If salt  
22 reconsolidation is unimpeded by fluid pore pressures, the material will eventually achieve  
23 extremely low permeabilities approaching those of the native Salado Formation. Recent  
24 developments in support of the WIPP shaft seal system have produced confirming experimental  
25 results, constitutive material models, and construction methods that substantiate use of a salt  
26 column to create a low permeability seal component. Reuse of salt excavated in the process of  
27 creating the underground openings has been advocated since its initial proposal in the 1950s.  
28 Replacing the natural material in its original setting ensures physical, chemical, and mechanical  
29 compatibility with the host formation.

30 The function of the compacted and reconsolidated salt column is to limit transmission of fluids  
31 into or out of the repository for the statutory period of 10,000 years. The functional period starts  
32 within a hundred years and lasts essentially forever. After a period of consolidation, the salt  
33 column will almost completely retard gas or brine migration within the former shaft opening. A  
34 completely consolidated salt column will achieve flow properties indistinguishable from natural  
35 Salado salt.

36 The salt component is composed of crushed Salado salt with additional small amounts of water.  
37 The total water content of the crushed salt will be adjusted to 1.5 wt% before it is tamped into  
38 place. Field and laboratory tests have verified that natural salt can be compacted to significant  
39 fractional density ( $\rho \geq 0.9$ ) with addition of these moderate amounts of water.

40 Dynamic compaction is the specified construction procedure to tamp crushed salt in the shaft.  
41 Deep dynamic compaction provides great energy to the crushed salt, is easy to apply, and has  
42 an effective depth of compactive influence greater than lift thickness. Dynamic compaction is

1 relatively straightforward and requires a minimal work force in the shaft. Compaction itself will  
2 follow procedures developed in a large-scale compaction demonstration, as outlined in  
3 Appendix G2-B.

4 Numerical models of the shaft provide density of the compacted salt column as a function of  
5 depth and time. Many calculations comparing models for consolidation of crushed salt were  
6 performed to quantify performance of the salt column, as discussed in Appendix D of the  
7 Compliance Submittal Design Report (Sandia, 1996) and the references (Callahan et al., 1996;  
8 Brodsky et al., 1996). From the density-permeability relationship of reconsolidating crushed salt,  
9 permeability of the compacted salt seal component is calculated. In general, results show that  
10 the bottom of the salt column consolidates rapidly, achieving permeability of  $1 \times 10^{-19}$  m<sup>2</sup> in  
11 about 50 years. By 100 years, the middle of the salt column reaches similar permeability.

12 Results of the large-scale dynamic compaction demonstration suggest that deep dynamic  
13 compaction will produce a sufficiently dense starting material. As with other seal components,  
14 testing of the material in situ will be difficult and probably not optimal to ensure quality of the  
15 seal element. This is particularly apparent for the compacted salt component because the  
16 compactive effort produces a finely powdered layer on the top of each lift. It was demonstrated  
17 (Hansen and Ahrens, 1996) that the fine powder is very densely compacted upon tamping the  
18 superincumbent lifts. The best means to ensure that the crushed salt element is placed properly  
19 is to establish performance through verification of quality assurance/quality control procedures.  
20 If crushed salt is placed with a reasonable uniformity of water and compacted with sufficient  
21 energy, long-term performance can be assured.

### 22 **5.2.5 Cementitious Grout**

23 Cementitious grouting is specified for all concrete members. Grouting is also used in advance of  
24 liner removal to stabilize the ground and to limit water inflow during shaft seal construction.  
25 Cementitious grout is specified because of its proven performance, nontoxicity, and previous  
26 use at the WIPP.

27 The function of grout is to stabilize the surrounding rock before existing concrete liners are  
28 removed. Grout will fill fractures within adjacent lithologies, thereby adding strength and  
29 reducing permeability and, hence, water inflow during shaft seal construction. Grout around  
30 concrete members of the concrete asphalt waterstop will be employed in an attempt to tighten  
31 the interface and fill microcracks in the DRZ. Efficacy of grouting will be determined during  
32 construction.

33 An ultrafine cementitious grout has been specifically developed for use at the WIPP (Ahrens  
34 and Onofrei, 1996). This grout consists of Type 5 portland cement, pumice as a pozzolanic  
35 material, and superplasticizer. The average particle size is approximately 2 microns. The  
36 ultrafine grout is mixed in a colloidal grout mixer, with a water to components ratio (**W:C**) of  
37 0.6:1.

38 Drilling and grouting sequences provided in Appendix G2-B follow standard procedures. Grout  
39 will be mixed on the surface and transported by slickline to the middle deck on the multi-deck  
40 stage (galloway). Grout pressures are specified below lithostatic to prevent hydrofracturing.

1 Performance of grout is not a consideration for compliance issues. Grouting of concrete  
2 elements is an added assurance to tighten interfaces. Grouting is used to facilitate construction  
3 by stabilizing any loose rock behind the concrete liner.

4 No verification of the effectiveness of grouting is currently specified. If injection around concrete  
5 plugs is possible, an evaluation of quantities and significance of grouting will be made during  
6 construction. Procedural specifications will include measurements of fineness and determination  
7 of rheology in keeping with processes established during the WIPP demonstration grouting  
8 (Ahrens et al., 1996).

### 9 **5.2.6 Earthen Fill**

10 A brief description of the earthen fill is provided in Appendix G2-A, and construction is  
11 summarized in Appendix G2-B. Compacted fill can be obtained from local borrow pits, or  
12 material excavated during shaft construction can be returned to the shaft. There are minimal  
13 design requirements for earthen fill and none that are related to WIPP regulatory performance.

### 14 **5.3 Concluding Remarks**

15 Materials specifications in Appendix G2-A provide descriptions of seal materials along with  
16 reasoning on their expected reliability in the WIPP setting. The specification follows a framework  
17 that states the function of the seal component, a description of the material, and a summary of  
18 construction techniques. The performance requirements for each material are detailed.  
19 Materials chosen for use in the shaft seal system have several common desirable attributes: low  
20 permeability, high density, compatibility, longevity, low cost, constructability, availability, and  
21 supporting documentation.

22



## 6. Construction Techniques

Construction of the shaft sealing system is feasible. The described procedures utilize currently available technology, equipment, and materials to satisfy shaft sealing system design guidance. Although alternative methods are possible, those described satisfy the design guidance requirements listed in Table G2-7 and detailed in the appendices. Construction feasibility is established by reference to comparable equipment and activities in the mining, petroleum, and food industries and test results obtained at the WIPP. Equipment and procedures for emplacement of sealing materials are described below.

### 6.1 Multi-Deck Stage

A multi-deck stage (Figures G2-6 and G2-7) consisting of three vertically connected decks will be the conveyance utilized during the shaft sealing operation. Detailed sketches of the multi-deck stage appear in Appendix G2-E. The stage facilitates installation and removal of utilities and provides a working platform for the various sealing operations. A polar crane attached to the lower deck provides the mechanism required for dynamic compaction and excavation of the shaft walls. Additionally, the header at the bottom of the slickline is supported by a reinforced steel shelf, which is securely bolted to the shaft wall during emplacement of sealing materials. The multi-deck stage can be securely locked in place in the shaft whenever desired (e.g., during dynamic compaction, excavation of the salt walls of the shaft, grouting, liner removal, etc.). The multi-deck stage is equipped with floodlights, remotely aimed closed-circuit television, fold-out floor extensions, a jib crane, and range-finding devices. Similar stages are commonly employed in shaft sinking operations.

The polar crane can be configured for dynamic compaction (Figure G2-6) or for excavation of salt (Figure G2-7); a man cage or bucket can be lowered through the stage to the working surface below. Controlled manually or by computer, the crane and its trolley utilize a geared track drive. The crane can swiftly position the tamper (required for dynamic compaction) in the drop positions required (Figure G2-8) or accommodate the undercutter required for excavation of the shaft walls. The crane incorporates a hoist on the trolley and an electromagnet, enabling it to position, hoist, and drop the tamper. A production rate of one drop every two minutes during dynamic compaction is possible.

### 6.2 Salado Mass Concrete (Shaft Station Monolith and Shaft Plugs)

Salado Mass Concrete, described in Appendix G2-A, will be mixed on surface at 20°C and transferred to emplacement depth through a slickline (i.e., a steel pipe fastened to the shaft wall and used for the transfer of sealing materials from surface to the fill horizon) minimizing air entrainment and ensuring negligible segregation. Existing sumps will be filled to the elevation of the floor of the repository horizon, and emplacement of the shaft station monolith is designed to eliminate voids at the top (back) of the workings.

When excavating salt for waterstops or plugs in the Salado Formation, an undercutter attached to the trolley of the polar crane will be forced into the shaft wall by a combination of geared trolley and undercutter drives. Full circumferential cuts will be accomplished utilizing the torque developed by the geared polar crane drive.

1 The undercutter proposed is a modified version of those currently in use in salt and coal mines,  
2 where their performance is proven. Such modifications and applications have been judged  
3 feasible by the manufacturer.

4 The concrete-salt interface and DRZ around concrete plugs in the Salado Formation (and the  
5 one at the base of the Rustler Formation) will be grouted with ultrafine grout. Injection holes will  
6 be collared in the top of the plug and drilled downward at 45° below horizontal. The holes will be  
7 drilled in a “spin” pattern describing a downward opening cone designed to intercept both  
8 vertical and horizontal fractures (Figure G2-9). The holes will be stage grouted (i.e., primary  
9 holes will be drilled and grouted, one at a time). Secondary holes will then be drilled and  
10 grouted, one at a time, on either side of primaries that accepted grout.

### 11 **6.3 Compacted Clay Columns (Salado and Rustler Formations)**

12 Cubic blocks of sodium bentonite, 20.8 cm on the edge and weighing approximately 18 kg, will  
13 be precompacted on surface to a density between 1.8 and 2.0 gm/cm<sup>3</sup> and emplaced manually.  
14 The blocks will be transferred from surface on the man cage. Block surfaces will be moistened  
15 with a fine spray of potable water, and the blocks will be manually placed so that all surfaces are  
16 in contact. Peripheral blocks will be trimmed to fit irregularities in the shaft wall, and remaining  
17 voids will be filled with a thick mortar of sodium bentonite and potable water. Such blocks have  
18 been produced at the WIPP and used in the construction of 0.9-m-diameter seals, where they  
19 performed effectively (Knowles and Howard, 1996). Alternatives, which may be considered in  
20 future design evaluations, are discussed in Appendix G2-B.

### 21 **6.4 Asphalt Waterstops and Asphaltic Mix Columns**

22 Neat asphalt is selected for the asphalt waterstops, and an asphaltic mastic mix (**AMM**)  
23 consisting of neat asphalt, fine silica sand, and hydrated lime will be the sealing material for the  
24 columns. Both will be fluid at emplacement temperature and remotely emplaced. Neat asphalt  
25 (or AMM, prepared in a pug mill near the shaft collar) will be heated to 180°C and transferred to  
26 emplacement depth via an impedance-heated, insulated tremie line (steel pipe) suspended from  
27 slips (pipe holding device) at the collar of the shaft.

28 This method of line heating is common practice in the mining and petroleum industries. This  
29 method lowers the viscosity of the asphalt so that it can be pumped easily. Remote  
30 emplacement by tremie line eliminates safety hazards associated with the high temperature and  
31 gas produced by the hot asphalt. Fluidity ensures that the material will flow readily and  
32 completely fill the excavations and shaft. Slight vertical shrinkage will result from cooling  
33 (calculations in Appendix D of the Compliance Submittal Design Report (Sandia, 1996)), but the  
34 material will maintain contact with the shaft walls and the excavation for the waterstop. Vertical  
35 shrinkage will be counteracted by the emplacement of additional material.

### 36 **6.5 Compacted WIPP Salt**

37 Dynamic compaction of mine-run WIPP salt has been demonstrated (Ahrens and Hansen,  
38 1995). The surface demonstration produced salt compacted to 90% of in-place rock salt density,  
39 with a statistically averaged permeability of  $1.65 \times 10^{-15}$  m<sup>2</sup>. Additional laboratory consolidation of  
40 this material at 5 MPa confining pressure (simulating creep closure of the salt) resulted in  
41 increased compaction and lower permeability (Brodsky, 1994). Dynamic compaction was



1 selected because it is simple, robust, proven, has excellent depth of compaction, and is  
2 applicable to the vertical WIPP shafts.

3 The compactive effect expanded laterally and downward in the demonstration, and observation  
4 during excavation of the compacted salt revealed that the lateral compactive effect will fill  
5 irregularities in the shaft walls. Additionally, the depth of compaction, which was greater than  
6 that of the three lifts of salt compacted, resulted in the bottom lift being additionally compacted  
7 during compaction of the two overlying lifts. This cumulative effect will occur in the shafts.

8 Construction of the salt column will proceed in the following manner:

- 9 • Crushed and screened salt will be transferred to the fill elevation via slickline. Use of  
10 slicklines is common in the mining industry, where they are used to transfer backfill  
11 materials or concrete to depths far greater than those required at the WIPP. Potable  
12 water will be added via a fine spray during emplacement at the fill surface to adjust the  
13 moisture content to  $1.5 \pm 0.3$  wt%, accomplished by electronically coordinating the  
14 weight of the water with that of the salt exiting the hose.
- 15 • Dynamic compaction will then be used to compact the salt by dropping the tamper in  
16 specific, pre-selected positions such as those shown in Figure G2-8.

## 17 **6.6 Grouting of Shaft Walls and Removal of Liners**

18 The procedure listed below is a common mining practice which will be followed at each  
19 elevation where liner removal is specified. If a steel liner is present, it will be cut into  
20 manageable pieces and hoisted to the surface for disposal, prior to initiation of grouting.

21 Upward opening cones of diamond drill holes will be drilled into the shaft walls in a spin pattern  
22 (Figure G2-10) to a depth ensuring complete penetration of the Disturbed Rock Zone (**DRZ**)  
23 surrounding the shaft. For safety reasons, no major work will be done from the top deck; all  
24 sealing activities will be conducted from the bottom deck. The ends of the holes will be 3 m  
25 apart, and the fans will be 3 m apart vertically, covering the interval from 3 m below to 3 m  
26 above the interval of liner removal. Tests at the WIPP demonstrated that the ultrafine  
27 cementitious grout penetrated more than 2 m from the injection holes(Ahrens et al., 1996).

28 Injection holes will be drilled and grouted one at a time, as is the practice in stage grouting.  
29 Primary holes are grouted first, followed by the grouting of secondary holes on either side of  
30 primaries that accepted grout. Ultrafine grout will be injected below lithostatic pressure to avoid  
31 hydrofracturing the rock, proceeding from the bottom fan upward. Grout will be mixed on surface  
32 and transferred to depth via the slickline.

33 Radial, horizontal holes will then be drilled on a 0.3-m grid, covering the interval to be removed.  
34 These will be drilled to a depth sufficient to just penetrate the concrete liner. A chipping hammer  
35 will be used to break a hole through the liner at the bottom of the interval. This hole,  
36 approximately 0.3 m in diameter, will serve as “free face,” to which the liner can be broken.  
37 Hydraulically-actuated steel wedges will then be used in the pre-drilled holes to break out the  
38 liner in manageable pieces, beginning adjacent to the hole and proceeding upward. Broken  
39 concrete will be allowed to fall to the fill surface, where it will be gathered and hoisted to the  
40 surface for disposal. Chemical seal rings will be removed as encountered.

1     **6.7     Earthen Fill**

2     Local soil, screened to produce a maximum particle dimension of approximately 15 mm, will be  
3     the seal material. This material will be transferred to the fill surface via the slickline and  
4     emplaced in the same manner as the salt. After adjusting the moisture content of the earthen fill  
5     below the concrete plug in the Dewey Lake Redbeds to achieve maximum compaction, the fill  
6     will be dynamically compacted, achieving a permeability as low as that of the enclosing  
7     formation.

8     The portion of the earthen fill above the plug will be compacted with a vibratory-impact  
9     sheepsfoot roller, a vibratory sheepsfoot roller, or a walk-behind vibratory plate compactor,  
10    because of insufficient height for dynamic compaction.

11    **6.8     Schedule**

12    For discussion purposes, it has been assumed that the shafts will be sealed two at a time. This  
13    results in the four shafts being sealed in approximately six and a half years. The schedules  
14    presented in Appendix G2-B are based on this logic. Sealing the shafts sequentially would  
15    require approximately eleven and a half years.

16

## 7. Structural Analyses of Shaft Seals

### 7.1 Introduction

The shaft seal system was designed in accordance with design guidance described in Section 3.2. To be successful, seal system components must exhibit desired structural behavior. The desired structural behavior can be as simple as providing sufficient strength to resist imposed loads. In other cases, structural behavior is critical to achieving desired hydrological properties. For example, permeability of compacted salt depends on the consolidation induced by shaft closure resulting from salt creep. In this example, results from structural analyses feed directly into fluid-flow calculations, which are described in Section 8, because structural behavior affects both time-dependent permeabilities of the compacted salt and pore pressures within the compacted salt. In other structural considerations, thermal effects are analyzed as they affect the constructability and schedule for the seal system. Thus a series of analyses, loosely termed structural analyses, were performed to accomplish three purposes:

1. to determine loads imposed on components and to assess both structural stability based on the strength of the component and mechanical interaction between components;
2. to estimate the influence of structural behavior of seal materials and surrounding rock on hydrological properties; and
3. to provide structural and thermal related information on construction issues.

For the most part, structural analyses rely on information and design details presented in the Design Description (Section 4), the Design Drawings (Appendix G2-E), and Material Specification (Section 5 and Appendix G2-A). Some analyses are generic, and calculation input and subsequent results are general in nature.

### 7.2 Analysis Methods

Finite-element modeling was the primary numerical modeling technique used to evaluate structural performance of the shaft seals and surrounding rock mass. Well documented finite-element computer programs, SPECTROM-32 and SPECTROM-41, were used in structural and thermal modeling, respectively. The computer program SALT\_SUBSID was used in the subsidence modeling over the backfilled shaft-pillar area. Specific details of these computer programs as they relate to structural calculations are listed in Appendix D of the Compliance Submittal Design Report (Sandia, 1996), Section D2.

### 7.3 Models of Shaft Seals Features

Structural calculations require material models to characterize the behavior of (1) each seal material (concrete, crushed salt, compacted clay, and asphalt); (2) the intact rock lithologies in the near-surface, Rustler, and Salado formations; and (3) any DRZ within the surrounding rock. A general description of the material models used in characterizing each of these materials and features is given below. Details of the models and specific values of model parameters are given in Appendix D in the Compliance Submittal Design Report (Sandia, 1996), Section D3.

### 7.3.1 Seal Material Models

The SMC thermal properties required for the structural analyses (thermal conductivity, density, specific heat, and volumetric heat generation rate) were obtained from SMC test data. Concrete was assumed to behave as a viscoelastic material, based on experimental data, and the elastic modulus of SMC was modeled as age-dependent. Strength properties of SMC were specified in the design (see Appendix G2-A).

For crushed salt, the deformational model included a nonlinear elastic component and a creep consolidation component. The nonlinear elastic modulus was assumed to be density-dependent, based on laboratory test data performed on WIPP crushed salt. Creep consolidation behavior of crushed salt was based on three candidate models whose parameters were obtained from model fitting to hydrostatic and shear consolidation test data performed on WIPP crushed salt. Creep consolidation models include functional dependencies on density, mean stress, stress difference, temperature, grain size, and moisture content.

Compacted clay was assumed to behave according to a nonlinear elastic model in which shear stiffness is negligible, and asphalt was assumed to behave as a weak elastic material. Thermal properties of asphalt were taken from literature.

### 7.3.2 Intact Rock Lithologies

Salado salt was assumed to be argillaceous salt that is governed by the Multimechanism Deformation Coupled Fracture (**MDCF**) model, which is an extension of the Munson-Dawson (**M-D**) creep model. A temperature-dependent thermal conductivity was necessary.

Salado interbeds were assumed to behave elastically. Their material strength was assumed to be described by a Drucker-Prager yield function, consistent with values used in previous WIPP analyses.

Deformational behavior of the near-surface and Rustler Formation rock types was assumed to be time-invariant, and their strength was assumed to be described by a Coulomb criterion, consistent with literature values.

### 7.3.3 Disturbed Rock Zone Models

Two different models were used to evaluate the development and extent of the DRZ within intact salt. The first approach used ratios of time-dependent stress invariants to quantify the potential for damage or healing to occur. The second approach used the damage stress criterion according to the MDCF model for WIPP salt.

## 7.4 Structural Analyses of Shaft Seal Components

### 7.4.1 Salado Mass Concrete Seals

Five analyses related to structural performance of SMC seals were performed, including (1) a thermal analysis, (2) a structural analysis, (3) a thermal stress analysis, (4) a dynamic compaction analysis, and (5) an analysis of the effects of clay swelling pressure. This section presents these analyses and evaluates the results in terms of the performance of the SMC seal.

1 Details of these calculations are given in Appendix D in the Compliance Submittal Design  
2 Report (Sandia, 1996), Section D4.

### 3 7.4.1.1 Thermal Analysis of Concrete Seals

4 The objective of this calculation was to determine expected temperatures within (and  
5 surrounding) an SMC emplacement resulting from its heat of hydration. Results indicate that the  
6 concrete component temperature increases from ambient (27°C) to a maximum of 53°C at 0.02  
7 year after emplacement. The maximum temperature in the surrounding salt is 38°C at  
8 approximately the same time. The thermal gradient within the concrete is approximately  
9 1.5°C/m. Most of the higher temperatures are contained within the concrete. At a radial distance  
10 of 2 m into the surrounding salt, the temperature rise is less than 1°C. These conditions are  
11 favorable for proper performance of the SMC components. A 26°C temperature rise and a  
12 1.5°C/m temperature gradient are not large enough to cause thermal cracking as the concrete  
13 cools (Andersen et al., 1992).

### 14 7.4.1.2 Structural Analysis of Concrete Seals

15 The objectives of this calculation were to determine (1) expected stresses within the concrete  
16 components caused by restrained creep of the surrounding salt and (2) expected stresses in the  
17 concrete component from weight of overlying seal material.

18 In the upper concrete-asphalt waterstop, radial stresses increase (compression is positive) from  
19 zero at time of emplacement ( $t = 0$ ) to 2.5 MPa at  $t = 50$  years. Similarly, radial stresses in the  
20 middle concrete component range from 3.5 to 4.5 MPa at 50 years after emplacement. In the  
21 lower concrete-asphalt waterstop, radial stresses range from 4.5 to 5.5 MPa at  $t = 50$  years. All  
22 the calculated stresses are well below the unconfined compressive strength of the concrete  
23 (30 MPa).

24 The upper, middle, and lower concrete-asphalt waterstops are located at depths of 300, 420,  
25 and 610 m, respectively. When performing these calculations, it was assumed that each  
26 concrete component must support the weight of the overlying materials between it and the next  
27 concrete component above it. Using an average overburden density of 0.02 MPa/m, stresses  
28 induced by the overlying material are significantly less than the strength of the concrete. The  
29 structural integrity of concrete components will not be compromised by either induced radial  
30 stress or imposed vertical stress.

### 31 7.4.1.3 Thermal Stress Analysis of Concrete Seals

32 The objectives of this calculation were (1) to determine thermal stresses in concrete  
33 components from the heat of hydration and (2) to determine thermal impact on the creep of the  
34 surrounding salt.

35 Thermoelastic stresses in the concrete were calculated based on a maximum temperature  
36 increase of 26°C and assuming a fully confined condition. Results of this calculation indicate  
37 that short-term compressive thermal stresses in the concrete will be less than 9.2 MPa. The  
38 temperature rise in the surrounding salt is insignificant in terms of producing either detrimental  
39 or beneficial effects. Based on these results, the structural integrity of concrete components will  
40 not be compromised by thermoelastic stresses caused by heat of hydration.

#### 1 7.4.1.4 Effect of Dynamic Compaction on Concrete Seals

2 The objective of this calculation was to determine a required thickness of seal layers above  
3 concrete components to reduce the impact of dynamic compaction. Compaction depths for  
4 crushed salt and clay layers are 2.8 m and 2.2 m, respectively. Layers 3.7-m thick for crushed  
5 salt and 3-m thick for clay are to be emplaced before compaction begins, thus providing a layer  
6 about 30% thicker than the calculated compaction depths.

#### 7 7.4.1.5 Effect of Clay Swelling Pressures on Concrete Seals

8 The objective of this calculation was to determine the increased stresses within concrete  
9 components as a result of clay swelling pressures. Test measurements on confined bentonite at  
10 an emplaced density of 1.8 g/cm<sup>3</sup> indicate that anticipated swelling pressures are on the order of  
11 3.5 MPa. In order to fracture the salt surrounding the clay, the swelling pressures must exceed  
12 the lithostatic rock stress in the salt, which ranges from nominally 8.3 MPa at the upper clay seal  
13 to 14.4 MPa at the lower clay seal. The design strength of the concrete (31.0 MPa) is  
14 significantly greater than the swelling pressure of 3.5 MPa. Even in the unlikely event that the  
15 clay swelled to lithostatic pressures, the resulting state of stress in the concrete seal would lie  
16 well below any failure surface. Furthermore, the compressive tangential stress in the salt along  
17 the shaft wall, even after stress relaxation from creep, is always larger than lithostatic. Hence,  
18 radial fracturing from clay swelling pressure is not expected.

### 19 7.4.2 Crushed Salt Seals

20 Two analyses related to structural performance of crushed salt seals were performed, including  
21 (1) a structural analysis and (2) an analysis to determine effects of pore pressure on  
22 consolidation of crushed salt seals. This section presents the results of these analyses and  
23 evaluates the results in terms of performance of crushed salt seals. Details of these analyses  
24 are given in Appendix D in the Compliance Submittal Design Report (Sandia, 1996), Section  
25 D4.

#### 26 7.4.2.1 Structural Analysis of Compacted Salt Seal

27 The objectives of this calculation were (1) to determine the fractional density of the crushed salt  
28 seal as a function of time and depth and, using these results, (2) to determine permeability of  
29 the crushed salt as a function of time and depth.

30 Results indicate that compacted salt will increase from its emplaced fractional density of 90% to  
31 a density of 95% approximately 40, 80, and 120 years after emplacement at the bottom, middle,  
32 and top of the shaft seal, respectively. Using the modified Sjaardema-Krieg creep consolidation  
33 model, the times required to fully reconsolidate the crushed salt to 100% fractional density are  
34 70 years, 140 years, and 325 years at the bottom, middle, and top of the salt column,  
35 respectively. Based on these results, the desired fractional densities (hence, permeability) can  
36 be achieved over a substantial length of the compacted salt seal in the range of 50 to 100 years.

#### 37 7.4.2.2 Pore Pressure Effects on Reconsolidation of Crushed Salt Seals

38 The objective of this calculation was to determine the effect of pore pressure on the  
39 reconsolidation of the crushed salt seal. Fractional densities of the crushed salt seal were  
40 calculated using the modified Sjaardema-Krieg consolidation model for a range of pore

1 pressures (0, 2, and 4 MPa). Results indicate that times required to consolidate the crushed salt  
2 increase as the pore pressure increases, as expected. For example, for a pore pressure of 2  
3 MPa, the times required to achieve a fractional density of 96% are about 90 years, 205 years,  
4 and 560 years at the bottom, middle, and top of the crushed salt column, respectively. A pore  
5 pressure of 4 MPa would effectively prevent reconsolidation of the crushed salt within a  
6 reasonable period (<1,000 years). The results of this calculation were used in the fluid flow  
7 calculations, and the impact of these pore pressures on the permeability of the crushed salt seal  
8 is described in Section 8 and Appendix C of the Compliance Submittal Design Report (Sandia,  
9 1996).

### 10 **7.4.3 Compacted Clay Seals**

11 One analysis was performed to determine the structural response of compacted clay seals. The  
12 objective of this calculation was to determine stresses in the upper Salado compacted clay  
13 component and the lower Salado compacted clay component as a result of creep of the  
14 surrounding salt. Details of this calculation are given in Appendix D in the Compliance Submittal  
15 Design Report (Sandia, 1996), Section D4. Results of this calculation indicate that after 50  
16 years the compressive stresses in the upper Salado compacted clay component are about 0.7  
17 MPa, not including the effects of swelling pressures. Similarly, after 50 years the stresses in the  
18 lower Salado compacted clay component are approximately 2.6 MPa. Based on these results,  
19 the compacted clay component will provide some restraint to the creep of salt and induce a  
20 back (radial) stress in the clay seal, which will promote healing of the DRZ in the surrounding  
21 intact salt (see discussion about DRZ in Section 7.5.1).

### 22 **7.4.4 Asphalt Seals**

23 Three analyses were performed related to structural performance of the asphalt seals, including  
24 (1) a thermal analysis, (2) a structural analysis, and (3) a shrinkage analysis. This section  
25 presents the results of these analyses and evaluates the results in terms of the performance of  
26 the asphalt seal. Details of these analyses are given in Appendix D of the Compliance Submittal  
27 Design Report (Sandia, 1996), Section D4.

#### 28 **7.4.4.1 Thermal Analysis**

29 The objectives of this calculation were (1) to determine temperature histories within the asphalt  
30 seal and the surrounding salt and (2) to determine effects of the length of the waterstop.

31 Results indicate that the center of the asphalt column will cool from its emplaced temperature of  
32 180°C to 83°C, 49°C, 31°C, and 26°C at times 0.1 year, 0.2 year, 0.5 year, and 1.0 year,  
33 respectively. Similarly, the asphalt/salt interface temperatures at corresponding times are 47°C,  
34 38°C, 29°C, and 26°C. The time required for a waterstop to cool is significantly less than that  
35 required to cool the asphalt column. Based on these results, about 40 days are required for  
36 asphalt to cool to an acceptable working environment temperature. The thermal impact on  
37 enhanced creep rate of the surrounding salt is considered to be negligible.

#### 38 **7.4.4.2 Structural Analysis**

39 The objective of this analysis was to calculate pressures in asphalt that result from restrained  
40 creep of the surrounding salt and to evaluate stresses induced on the concrete seal component  
41 by such pressurization.



1 Results indicate that pressures in the waterstops after 100 years are 1.8 MPa, 2.5 MPa, and 3.2  
2 MPa for the upper, middle, and lower waterstops, respectively. Based on these results, the  
3 structural integrity of concrete components will not be compromised by imposed pressures, and  
4 the rock surrounding the asphalt will not be fractured by the pressure. The pressure from  
5 asphalt is enough to initiate healing of the DRZ surrounding the waterstop.

#### 6 7.4.4.3 Shrinkage Analysis

7 The objective of this analysis was to calculate shrinkage of the asphalt column as it cools from  
8 its emplaced temperature to an acceptable working environment temperature. Results of this  
9 analysis indicate that the 42-m asphalt column will shrink 0.9 m in height as the asphalt cools  
10 from its emplaced temperature of 180°C to 38°C.

## 11 7.5 Disturbed Rock Zone Considerations

### 12 7.5.1 General Discussion of DRZ

13 Microfracturing leading to a DRZ occurs within salt whenever excavations are made. Laboratory  
14 and field measurements show that a DRZ has enhanced permeability. The body of evidence  
15 strongly suggests that induced fracturing is reversible and healed when deviatoric stress states  
16 created by the opening are reduced. Rigid seal components in the shaft provide a restraint to  
17 salt creep closure, thereby inducing healing stress states in the salt. A more detailed discussion  
18 of the DRZ is included in Appendix D in the Compliance Submittal Design Report (Sandia,  
19 1996).

### 20 7.5.2 Structural Analyses

21 Three analyses were performed to determine the behavior of the DRZ in the rock mass  
22 surrounding the shaft. The first analysis considered time-dependent DRZ development and  
23 subsequent healing of intact Salado salt surrounding each of the four seal materials. The  
24 second analysis considered time-dependent development of the DRZ within anhydrite and  
25 polyhalite interbeds within the Salado Formation. The last analysis considered time-independent  
26 DRZ development within the near-surface and Rustler formations. These analyses are  
27 discussed below and given in more detail in Appendix D of the Compliance Submittal Design  
28 Report (Sandia, 1996), Section D5. Results from these analyses were used as input conditions  
29 for the fluid flow analysis presented in Section 8 and Appendix C of the Compliance Submittal  
30 Design Report (Sandia, 1996).

#### 31 7.5.2.1 Salado Salt

32 The objective of this calculation was to determine time-dependent extent of the DRZ in salt,  
33 assuming no pore pressure effects, for each of the four shaft seal materials (i.e., concrete,  
34 crushed salt, compacted clay, and asphalt. The seal materials below a depth of about 300 m  
35 provide sufficient rigidity to heal the DRZ within 100 years. Asphalt, modeled as a weak elastic  
36 material, will not create a stress state capable of healing the DRZ because it is located high in  
37 the Salado.



#### 1 7.5.2.2 Salado Anhydrite Beds

2 The objective of this calculation was to determine the extent of the DRZ within the Salado  
3 anhydrite and polyhalite interbeds as a result of creep of surrounding salt.

4 For all interbeds, the factor of safety against failure (shear or tensile fracturing) increases with  
5 depth into the rock surrounding the shaft wall. These results indicate that, with the exception of  
6 Marker Bed 117 (**MB117**), the factor of safety is greater than 1 (no DRZ will develop) for all  
7 interbeds. For MB117, the potential for fracturing is localized to within 1 m of the shaft wall.

#### 8 7.5.2.3 Near-Surface and Rustler Formations

9 The objective of this calculation was to determine the extent of the DRZ surrounding the shafts  
10 in the near-surface and Rustler formations.

11 Rock types in near-surface and Rustler formations are anhydrite, dolomite, and mudstone.  
12 These rock types exhibit time-independent behavior. Results indicate that no DRZ will develop  
13 in anhydrite and dolomite (depths between 165 and 213 m). For mudstone layers, the radial  
14 extent of the DRZ increases with depth, reaching a maximum of 2.6 shaft radii at a depth of 223  
15 m.

### 16 7.6 Other Analyses

17 This section discusses two structural analyses performed in support of design concerns, namely  
18 (1) the asphalt waterstops constructability and (2) benefits from shaft station backfilling.  
19 Analyses performed in support of these efforts are discussed below and given in more detail in  
20 Appendix D of the Compliance Submittal Design Report (Sandia, 1996), Section D6.

#### 21 7.6.1 Asphalt Waterstops

22 The DRZ is a major contributor to fluid flows through a low permeability shaft seal system,  
23 regardless of the materials emplaced within the shaft. Therefore, to increase the confidence in  
24 the overall shaft seal, low permeability layers (termed radial waterstops) were included to  
25 intersect the DRZ surrounding the shaft. These waterstops are emplaced to alter the flow  
26 direction either inward toward the shaft seal or outward toward intact salt. Asphalt-filled  
27 waterstops will be effective soon after emplacement. The objectives of these structural  
28 calculations were to evaluate performance of the waterstops in terms of (1) intersecting the DRZ  
29 around the shaft, (2) inducing a new DRZ because of special excavation, and (3) promoting  
30 healing of the DRZ.

31 Results indicate that the DRZ from the shaft extends to a radial distance of less than one shaft  
32 radius (3.04 m). Waterstop excavation extends the DRZ radially to about 1.4 shaft radii (4.3 m).  
33 However, this extension is localized within the span of the concrete component and extends  
34 minimally past the waterstop edge. The DRZ extent reduced rapidly after the concrete and  
35 asphalt restrained creep of the surrounding salt. After 20 years, the spatial extent of the DRZ is  
36 localized near the asphalt-concrete interface, extending spatially into the salt at a distance of  
37 less than 2 m. Based on these results, construction of waterstops is possible without  
38 substantially increasing the DRZ. Furthermore, the waterstop extends well beyond the  
39 maximum extent of the DRZ surrounding the shaft and effectively blocks this flow path (within 2  
40 years after emplacement), albeit over only a short length of the flow path.

1    **7.6.2    Shaft Pillar Backfilling**

2    The objective of this calculation was to assess potential benefits from backfilling a portion of the  
3    shaft pillar to reduce subsurface subsidence and thereby decrease the potential for inducing  
4    fractures along the shaft wall. The calculated subsidence without backfilling is less than one  
5    foot, due to the relatively low extraction ratio at the WIPP. Based on the results of this analysis,  
6    backfilling portions of the shaft pillar would result in only 10% to 20% reduction in surface  
7    subsidence. This reduction in subsidence from backfilling is not considered enough to warrant  
8    backfilling the shaft pillar area. The shaft seals within the Salado are outside the angle-of-draw  
9    for any horizontal displacements caused by the subsidence over the waste panels. Moreover,  
10   horizontal strains caused by subsidence induced by closures within the shaft pillar are  
11   compressive in nature and insignificant in magnitude to induce fracturing along the shaft wall.

12

## 8. Hydrologic Evaluation of the Shaft Seal System

### 8.1 Introduction

The design guidance in Section 3 presented the rationale for sealing the shaft seal system with low permeability materials, but it did not provide specific performance measures for the seal system. This section compares the hydrologic behavior of the system to several performance measures that are directly related to the ability of the seal system to limit liquid and gas flows through the seal system. The hydrologic evaluation is focused on the processes that could result in fluid flow through the shaft seal system and the ability of the seal system to limit any such flow. Transport of radiological or hazardous constituents will be limited if the carrier fluids are similarly limited.

The hydrologic performance models are fully described in Appendix C of the Compliance Submittal Design Report (Sandia, 1996). The analyses presented are deterministic. Quantitative values for those parameters that are considered uncertain and that may significantly impact the primary performance measures have been varied, and the results are presented in Appendix C of the Compliance Submittal Design Report (Sandia, 1996). This section summarizes the seal system performance analyses and discusses results within the context of the design guidance of Section 3. The results demonstrate that (1) fluid flows will be limited within the shaft seal system and (2) uncertainty in the conceptual models and parameters for the seal system are mitigated by redundancy in component function and materials.

### 8.2 Performance Models

The physical processes that could impact seal system performance are presented in detail in Appendix C of the Compliance Submittal Design Report (Sandia, 1996). These processes have been incorporated into four performance models. These models evaluate (1) downward migration of groundwater from the Rustler Formation, (2) gas migration and consolidation of the crushed salt seal component, (3) upward migration of brines from the repository, and (4) flow between water-bearing zones in the Rustler Formation. The first three are analyzed using numerical models of the Air Intake Shaft (**AIS**) seal system and the finite-difference codes SWIFT II and TOUGH28W. These codes are extensively used and well documented within the scientific community. A complete description of the models is provided in Appendix C of the Compliance Submittal Design Report (Sandia, 1996). The fourth performance model uses a simple, analytical solution for fluid flow. Results from the analyses are summarized in the following sections and evaluated in terms of the design guidance presented in Section 3.

Material properties and conceptual models that may significantly impact seal system performance have been identified, and uncertainty in properties and models have been addressed through variation of model parameters. These parameters include (1) the effective permeability of the DRZ, (2) those describing salt column consolidation and the relationship between compacted salt density and permeability, and (3) repository gas pressure applied at the base of the shaft seal system.

### 8.3 Downward Migration of Rustler Groundwater

The shaft seal system is designed to limit groundwater flowing into and through the shaft sealing system (see Section 3). The principal source of groundwater to the seal system is the Culebra Member of the Rustler Formation. The Magenta Member of this formation is also considered a

1 groundwater source, albeit a less significant source than the Culebra. No significant sources of  
2 groundwater exist within the Salado Formation; however, brine seepage has been noted at a  
3 number of the marker beds. The modeling includes the marker beds, as discussed in Appendix  
4 C of the Compliance Submittal Design Report (Sandia, 1996). Downward migration of Rustler  
5 groundwater must be limited so that liquid saturation of the compacted salt column salt column  
6 does not impact the consolidation process and to ensure that significant quantities of brine do  
7 not reach the repository horizon. Because it is clear that limitation of liquid flow into the salt  
8 column necessarily limits liquid flow to the repository, the volumetric flux of liquid into and  
9 through the salt column were selected as performance measures for this model.

10 Consolidation of the compacted salt column salt column will be most rapid immediately following  
11 seal construction. Simulations were conducted for the 200-year period following closure to  
12 demonstrate that, during this initial period, downward migration of Rustler groundwater will be  
13 insufficient to impact the consolidation process. Lateral migration of brine through the marker  
14 beds is also quantified in the analysis and shown to be nondetrimental to the function of the salt  
15 column.

### 16 **8.3.1 Analysis Method**

17 Seal materials will not, in general, be fully saturated with liquid at the time of construction. The  
18 host rock surrounding the shafts will also be partially desaturated at the time of seal  
19 construction. The analysis presented in this section assumes a fully saturated system. The  
20 effects of partial saturation of the shaft seal system are favorable in terms of system  
21 performance, as will be discussed in Section 8.3.2.

22 Seal material and host rock properties used in the analyses are discussed in Appendix C of the  
23 Compliance Submittal Design Report (Sandia, 1996), Section C3. Appendix G2-A contains a  
24 detailed discussion of seal material properties. A simple perspective on the effects of material  
25 and host rock properties may be obtained from Darcy's Law. At steady-state, the flow rate in a  
26 fully saturated system depends directly on the system permeability. The seal system consists of  
27 the component material and host rock DRZ. Low permeability is specified for the engineered  
28 materials; thus the system component most likely to impact performance is the DRZ. Rock  
29 mechanics calculations presented in Appendix D of the Compliance Submittal Design Report  
30 (Sandia, 1996) predict that the DRZ in the Salado Formation will not be vertically continuous  
31 because of the intermittent layers of stiff anhydrites (marker beds). Asphalt waterstops are  
32 included in the design to minimize DRZ impacts. The effects of the marker beds and the asphalt  
33 waterstops on limiting downward migration are explicitly simulated through variation of the  
34 permeability of the layers of Salado DRZ.

35 Initial, upper, and lateral boundary conditions for the performance model are consistent with  
36 field measurements for the physical system. At the base of the shaft a constant atmospheric  
37 pressure is assumed.

### 38 **8.3.2 Summary of Results**

39 The initial pore volumes in the filled repository and the AIS salt column are approximately  
40 460,000 m<sup>3</sup> and 250 m<sup>3</sup>, respectively. The performance model predicts a maximum cumulative  
41 flow of less than 5 m<sup>3</sup> through the sealed shafts for the 200 years following closure. If the  
42 marker beds have a disturbed zone immediately surrounding the shaft, the maximum flow is  
43 less than 10 m<sup>3</sup> during the same period. Assuming the asphalt waterstops are not effective in

1 interrupting the vertical DRZ, the volumetric flow increases but is still less than 30 m<sup>3</sup> for the 200  
2 years following closure. These volumes are less than 1/100 of 1% of the pore volume in the  
3 repository and less than 20% of the initial pore volume of the salt column.

4 Two additional features of the model predictions should also be considered. The first of these is  
5 that flow rates fall from less than 1 m<sup>3</sup> / year in the first five years to negligible values within 10  
6 years of seal construction. Therefore most of the cumulative flow occurs within a few years  
7 following closure. The second feature is the model prediction that the system returns to nearly  
8 ambient undisturbed pressures within two years. The repressurization occurs quickly within the  
9 model due to the assumption of a fully saturated flow regime because of brine incompressibility.  
10 As will be discussed in Section 8.4, the pore pressure in the compacted salt column is a critical  
11 variable in the analysis. The pressure profiles predicted by the model are an artifact of the  
12 assumption of full liquid saturation and do not apply to the pore pressure analysis of the salt  
13 column.

14 The magnitude of brine flow that can reach the repository through a sealed shaft is minimal and  
15 will not impact repository performance. The flow that reaches the salt column must be assessed  
16 with regard to the probable impacts on the consolidation process. Although the volume of flow to  
17 the salt column is a small percentage of the available pore volume, the saturation state and fluid  
18 pore pressure of this component are the variables of significance. These issues cannot be  
19 addressed by a fully saturated model. Instead it is necessary to include these findings in a multi-  
20 phase model that includes the salt column. This is the topic of Section 8.4.

21 The results of the fully saturated model will over-predict the flow rates through the sealed shaft.  
22 This analysis does not take credit for the time required for the system to resaturate, nor does it  
23 take credit for the sorptive capabilities of the clay components. The principal source of  
24 groundwater to the system is the Rustler Formation. The upper clay component is located below  
25 the Rustler and above the salt column and will be emplaced at a liquid saturation state of  
26 approximately 80%. Bentonite clays exhibit strong hydrophilic characteristics, and it is expected  
27 that the upper clay component will have these same characteristics. As a result, it is possible  
28 that a significant amount of the minimal Rustler groundwater that reaches the clay column will  
29 be absorbed and retained by this seal component. Although this effect is not directly included in  
30 the present analysis, the installation of a partially saturated clay component provides assurance  
31 that the flow rates predicted by the model are maximum values.

#### 32 **8.4 Gas Migration and Consolidation of Compacted Salt Column**

33 The seal system is designed to limit the flow of gas from the disposal system through the sealed  
34 shafts. Migration of gas could impact performance if this migration substantially increases the  
35 fluid pore pressure of the compacted salt column. The initial pore pressure of the salt column  
36 will be approximately atmospheric. The sealed system will interact with the adjacent desaturated  
37 host rock as well as the far-field formation. Natural pressurization will occur as the system  
38 returns to an equilibrium state. This pressurization, coupled with seepage of brine through the  
39 marker beds, will also result in increasing fluid pore pressure within the compacted salt column.  
40 The analysis presented in this section addresses the issue of fluid pore pressure in the  
41 compacted salt column resulting from the effects of gas generation at the repository horizon and  
42 natural repressurization from the surrounding formation. A brief discussion on the impedance to  
43 gas flow afforded by the lower compacted clay column is also presented.

#### 1 **8.4.1 Analysis Method**

2 A multi-phase flow model of the lower seal system was developed to evaluate the performance  
3 of components extending from the middle SMC component to the repository horizon. Rock  
4 mechanics calculations presented in Section 7 and Appendix D of the Compliance Submittal  
5 Design Report (Sandia, 1996) predict that the compacted salt column will consolidate for a  
6 period of approximately 400 years if the fluid-filled pores of the column do not produce a  
7 backstress. Within the physical setting of the compacted salt column, three processes have  
8 been identified which may result in a significant increase in pore pressure: groundwater flow  
9 from the Rustler Formation, gas migration from the repository, and natural fluid flow and  
10 repressurization from the Salado Formation. The first two processes were incorporated into the  
11 model as initial and boundary conditions, respectively. The third process was captured in all  
12 simulations through modeling of the lithologies surrounding the shaft. Simulations were  
13 conducted for 200 years following closure to evaluate any effects these processes might have  
14 on the salt column during this initial period.

15 As discussed in Section 8.3.1, the host rock DRZ is an important consideration in seal system  
16 performance. A vertically continuous DRZ could exist in both the Rustler and Salado  
17 Formations. Concrete-asphalt waterstops are included in the design to add assurance that a  
18 DRZ will not adversely impact seal performance. The significance of a continuous DRZ and  
19 waterstops will be evaluated based on results of the performance model.

20 A detailed description of the model grid, assumptions, and parameters is presented in Appendix  
21 C of the Compliance Submittal Design Report (Sandia, 1996).

#### 22 **8.4.2 Summary of Results**

23 The consolidation process is a function of both time and depth. The resultant permeability of the  
24 compacted salt column will similarly vary. To simplify the evaluation, an effective permeability of  
25 the salt component was calculated. This permeability is calculated by analogy to electrical circuit  
26 theory. The permeability of each model layer is equated to a resistor in a series of resistors. The  
27 equivalent resistance (i.e., permeability) of a homogeneous column of identical length is derived  
28 in this manner. Figure G2-11 illustrates this process.

29 Results of the performance model simulations are summarized in Table G2-12. The effective  
30 permeabilities were calculated by the model assuming that, as the salt consolidated,  
31 permeability was reduced pursuant to the best-fit line through the experimental data (Appendix  
32 G2-A, Figure G2A-7). From Table G2-12 it is clear that, for all simulated conditions, the salt  
33 column consolidates to very low values in 200 years. Differences in the effective permeability  
34 because of increased repository gas pressure and a vertically continuous DRZ were negligible.  
35 The DRZ around concrete components is predicted to heal (Appendix D of the Compliance  
36 Submittal Design Report (Sandia, 1996)) within 25 years. If the asphalt waterstops do not  
37 function as intended, the DRZ in this region will still heal in 25 years, as compared to 2 years for  
38 effective waterstops. The effective permeability of the compacted salt column increases by  
39 about a factor of two for this condition. However, the resultant permeability is sufficiently low that  
40 the compacted salt columns will comprise permanent effective seals within the WIPP shafts.



**Table G2-12**  
**Summary of Results from Performance Model**

Repository Pressure	Rustler Flow (m <sup>3</sup> )	Continuous DRZ (Yes/No)	Concrete-Asphalt Waterstop Healing Time (Years)	Effective Permeability at 200 Years (m <sup>2</sup> )
7 MPa in 100 Years	0	No	2	3.3×10 <sup>-20</sup>
14 MPa in 200 Years	0	No	2	3.3×10 <sup>-20</sup>
7 MPa in 100 Years	2.7	Yes	2	3.4×10 <sup>-20</sup>
7 MPa in 100 Years	17.2	Yes	25	6.0×10 <sup>-20</sup>

The relationship between the fractional density (i.e., consolidation state) of the compacted salt column and permeability is uncertain, as discussed in Appendix G2-A. Lines drawn through the experimental data (Figure A-7) provide a means to quantify this uncertainty but do not capture the actual physical process of consolidation. As observed through microscopy, consolidation is dominated by pressure solution and redeposition, a mechanism of mass movement facilitated by the presence of moisture on grain boundaries (Hansen and Ahrens, 1996). As this process continues, the connected porosity and hence permeability of the composite mass will reduce at a rate that has not been characterized by the data collected in WIPP experiments. The results of the multi-phase performance model presented in Table G2-12 used a best-fit line through the data. Additional simulations were conducted using a line that represents a 95% certainty that the permeability is less than or equal to values taken from this line. Model simulations that used the 95% line are not considered representative of the consolidation process. However, these results provide an estimation of the significance that this uncertainty may have on the seal system performance.

Figure G2-12 depicts the effective permeability of the salt column as a function of time using the 95% line. The consolidation process, and hence permeability reduction, essentially stopped at 75 years for this simulation. Although the model predicts that the fractional density at the base of the salt column will reach approximately 97% of the density of intact halite, the permeability remains several orders of magnitude higher than that of the surrounding host rock. As a result, repressurization occurs rapidly throughout the vertical extent of the compacted salt column, and consolidation ceases. Laboratory experiments have shown that permeability to brine should decrease to levels of 10<sup>-18</sup> to 10<sup>-20</sup> m<sup>2</sup> at the fractional densities predicted by the performance model. The transport of brine within the consolidating salt will reduce the permeability even further (Brodsky et al., 1995). The predicted permeability of 10<sup>-16</sup> m<sup>2</sup> is still sufficiently low that brine migration would be limited (DOE, 1995). However, the results of this analysis are more valuable in terms of demonstrating the coupled nature of the mechanical and hydrological behavior of consolidating crushed salt.

A final consideration within this performance model relates to the lower compacted clay column. This clay column is included in the design to provide a barrier to both gas and brine migration from the repository horizon. The ability of the clay to prevent gas migration will depend upon its liquid saturation state (Section 5 and Appendix G2-A). The lower clay component has an initial liquid saturation of about 80%, and portions of the column achieve brine saturations of nearly 100% during the 200 year simulation period. If the clay component performs as designed, gas migration through this component should be minimal. An examination of the model gas saturations indicates that, for all runs, gas flow occurs primarily through the DRZ prior to

1 healing. These model predictions are consistent with field demonstrations that brine-saturated  
2 bentonite seals will prevent gas flow at differential pressures of up to 4 MPa (Knowles and  
3 Howard, 1996).

#### 4 **8.5 Upward Migration of Brine**

5 The performance model discussed in Section 8.3 was modified to simulate undisturbed  
6 equilibrium pressures. As discussed in Appendix C of the Compliance Submittal Design Report  
7 (Sandia, 1996), the Salado Formation is overpressurized with respect to the measured heads in  
8 the Rustler, and upward migration of contaminated brines could occur through an inadequately  
9 sealed shaft. Sections 8.3 and 8.4 demonstrated that the compacted salt column will  
10 consolidate to a low permeability following repository closure. Appendix D of the Compliance  
11 Submittal Design Report (Sandia, 1996) and Section 7 show that the DRZ surrounding the long-  
12 term clay and crushed salt seal components will completely heal within the first several  
13 decades. As a result, upward migration at the base of the Salado salt is predicted to be  
14 approximately 1 m<sup>3</sup> over the regulatory period. At the Rustler/Salado contact, a total of  
15 approximately 20 m<sup>3</sup> migrates through the sealed AIS over the regulatory period. The only brine  
16 sources between these two depths are the marker beds. It can therefore be concluded that most  
17 of the brine flow reaching the Rustler/Salado contact originates in marker beds above the  
18 repository horizon. The seal system effectively limits the flow of brine and gas from the  
19 repository through the sealed shafts throughout the regulatory period.

#### 20 **8.6 Intra-Rustler Flow**

21 The potential exists for vertical flow within water-bearing strata of the Rustler Formation. Flow  
22 rates were estimated using a closed form solution of the steady-state saturated flow equation  
23 (Darcy's Law). The significance of the calculated flow rates can be assessed in terms of the  
24 width of the hydraulic disturbance (i.e., plume half-width) generated in the recipient flow field.  
25 The plume half-width was calculated to be minimal for all expected conditions (Compliance  
26 Submittal Design Report (Sandia, 1996), Section C7). Intra-Rustler flow is therefore concluded  
27 to be of such a limited quantity that (1) it will not affect either the hydraulic or chemical regime in  
28 the Rustler and (2) it will not be detrimental to the seal system.

29



## 9. Conclusions

The principal conclusion drawn from discussions in the previous sections and details provided in the appendices is that an effective, implementable design has been documented for the WIPP shaft sealing system. Specifically, the six elements of the Design Guidance, Table G2-12, are implemented in the design in the following manner:

1. The shaft sealing system shall limit the migration of radiological or other hazardous constituents from the repository horizon to the regulatory boundary during the 10,000-year regulatory period following closure.

Based on the analysis presented in Section 8.5, it was determined that this shaft sealing system effectively limits the migration of radiological or other hazardous constituents from the repository horizon to the regulatory boundary during the 10,000-year regulatory period following closure.

2. The shaft sealing system shall limit groundwater flowing into and through the shaft sealing system.

The combination of the seal components in the Salado Formation, the Rustler Formation, and above the Rustler combine to produce a robust system. Based on analysis presented in Section 8.3, it was concluded that the magnitude of brine flow that can reach the repository through the sealed shaft is minimal and will not impact repository performance.

3. The shaft sealing system shall limit chemical and mechanical incompatibility of seal materials with the seal environment.

The sealing system components are constructed of materials possessing high durability and compatibility with the host rock. Engineered materials including salt-saturated concrete, bentonite, clays, and asphalt are expected to retain their design properties over the regulatory period.

4. The shaft sealing system shall limit the possibility for structural failure of individual components of the sealing system.

Analysis of components has determined that: (a) the structural integrity of concrete components will not be compromised by induced radial stress, imposed vertical stress, temperature gradients, dynamic compaction of overlying materials, or swelling pressure associated with bentonite (Section 7.4.1); (b) the thermal impact of asphalt on the creep rate of the salt surrounding the asphalt waterstops is negligible (Section 7.4.4); and (c) the pressure from the asphalt element of the concrete-asphalt waterstops is sufficient to initiate healing of the surrounding DRZ within two years of emplacement (Section 7.6.1). The potential for structural failure of sealing components is minimized by the favorable compressive stress state that will exist in the sealed WIPP shafts.

5. The shaft sealing system shall limit subsidence of the ground surface in the vicinity of the shafts and the possibility of accidental entry after sealing.

1           The use of high density sealing materials that completely fill the shafts eliminates the  
2           potential for shaft wall collapse, eliminates the possibility of accidental entry after  
3           closure, and assures that local surface depressions will not occur at shaft locations.

4           6. The shaft sealing system shall limit the need to develop new technologies or materials  
5           for construction of the shaft sealing system.

6           The shaft sealing system utilizes existing construction technologies (identified in  
7           Section 6) and materials (identified in Section 5).

8           The design guidance can be summarized as focusing on two principal questions: Can you build  
9           it, and will it work? The use or adaptation of existing technologies for the placement of the seal  
10          components combined with the use of available, common materials assure that the design can  
11          be constructed. Performance of the sealing system has been demonstrated in the hydrologic  
12          analyses that show very limited flows of gas or brine, in structural analyses that assure  
13          acceptable stress and deformation conditions, and in the use of low permeability materials that  
14          will function well in the environment in which they are placed. Confidence in these conclusions  
15          is bolstered by the basic design approach of using multiple components to perform each  
16          intended sealing function and by using extensive lengths within the shafts to effect a sealing  
17          system. Additional confidence is added by the results of field and lab tests in the WIPP  
18          environment that support the data base for the seal materials.

19

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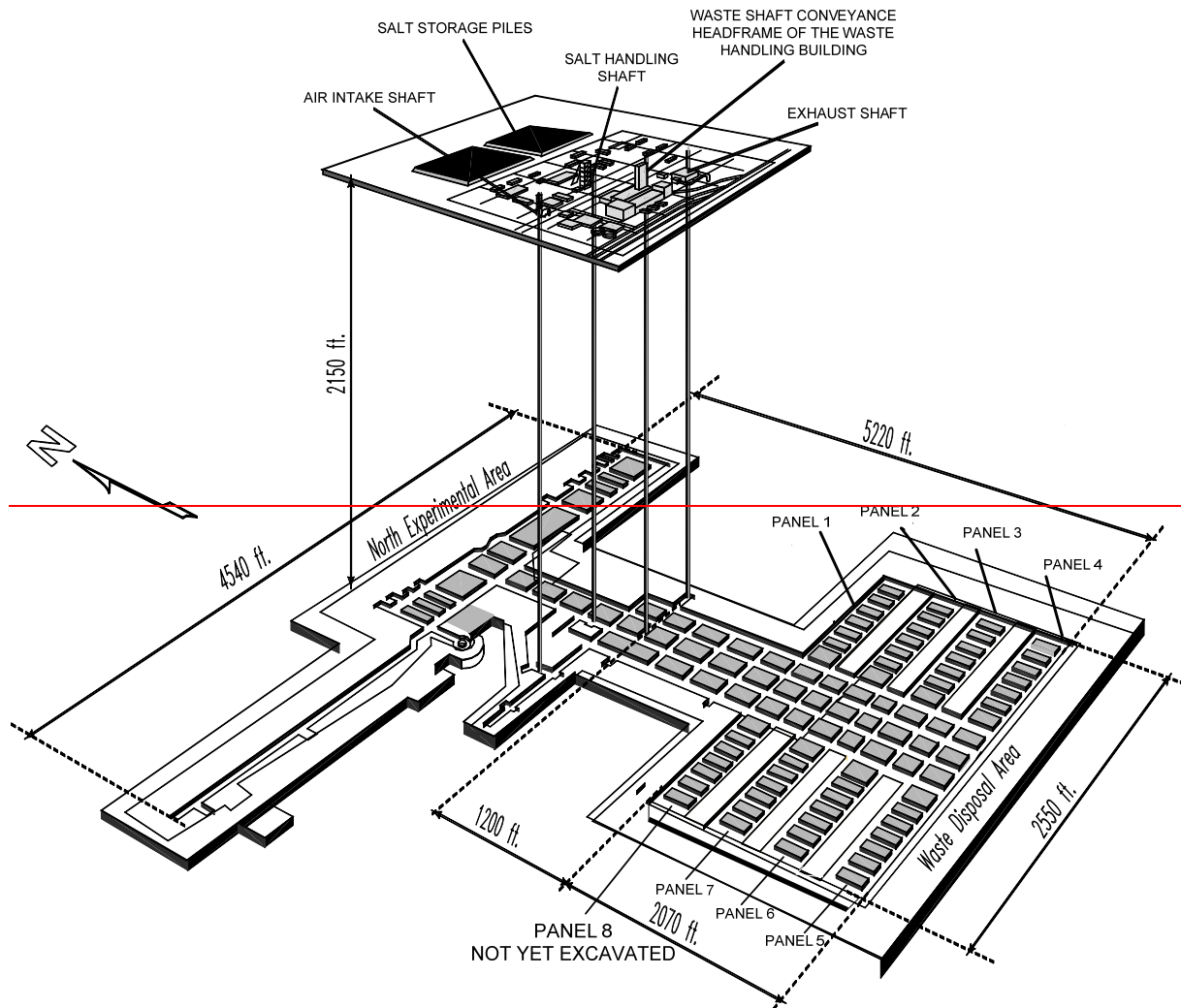
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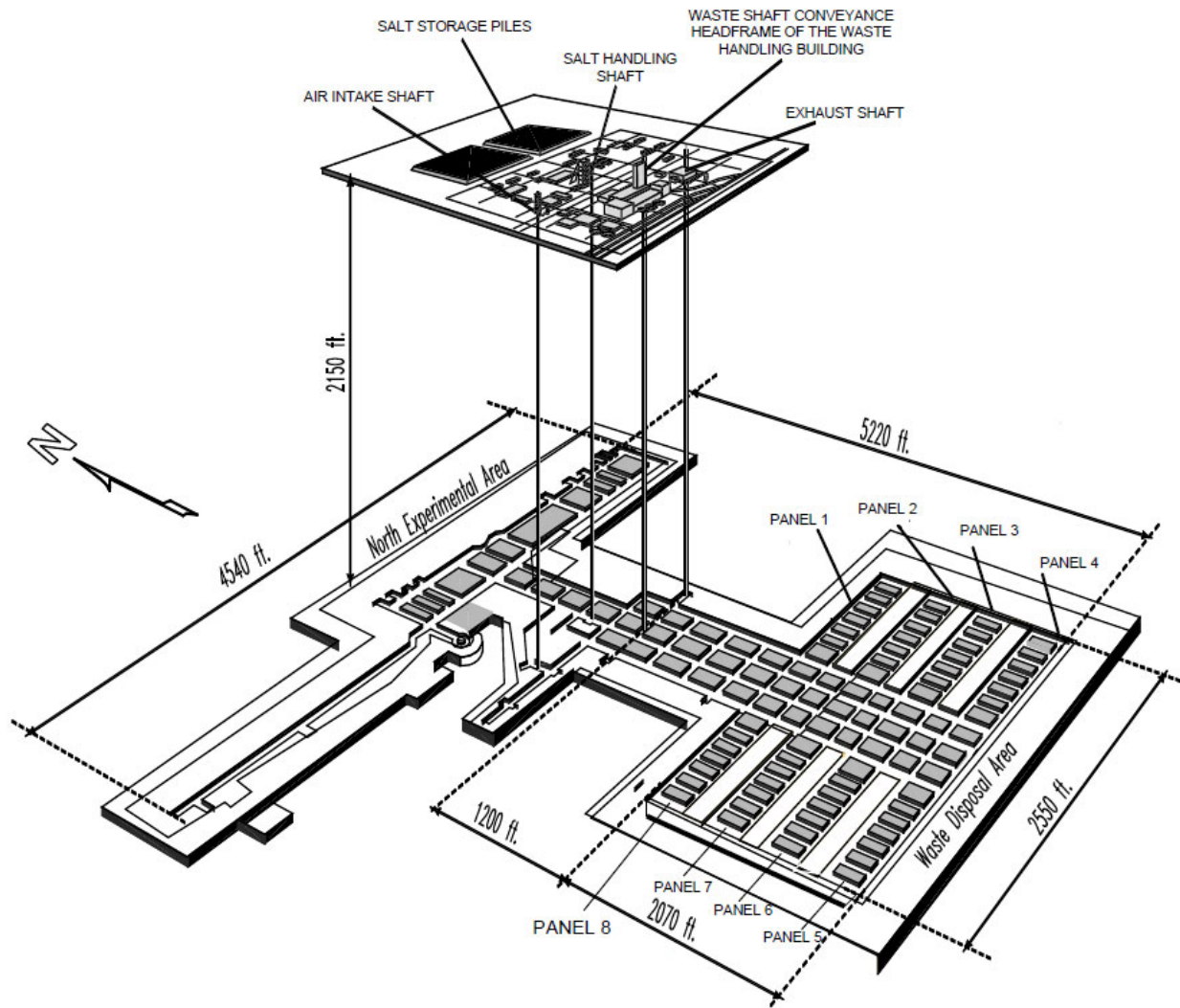
## FIGURES



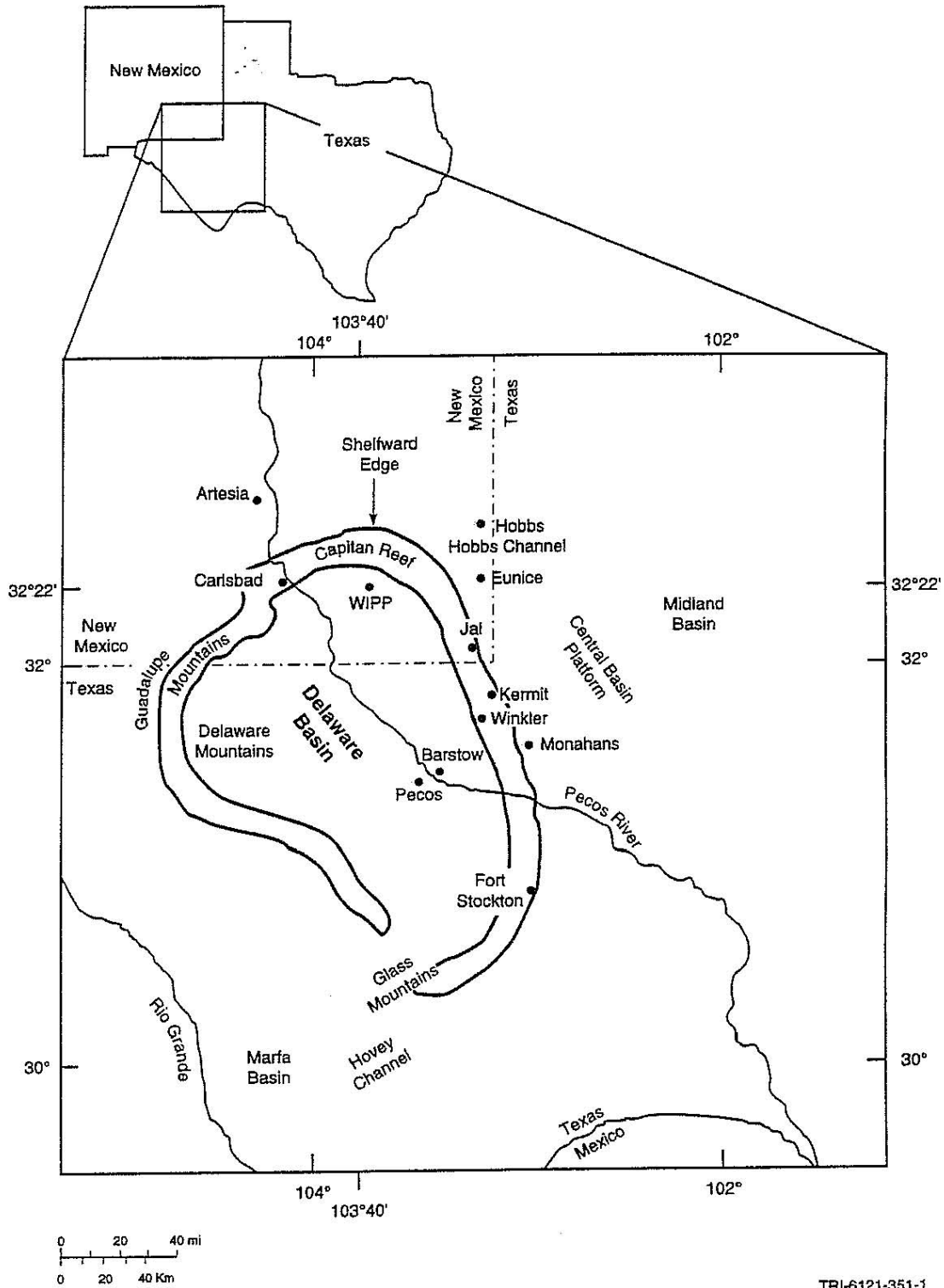
Waste Isolation Pilot Plant  
Hazardous Waste Facility Permit  
Attachment G2  
~~November 2022~~ December 2022 Renewal Draft Permit







**Figure G2-1**  
**View of the WIPP Underground Facility**

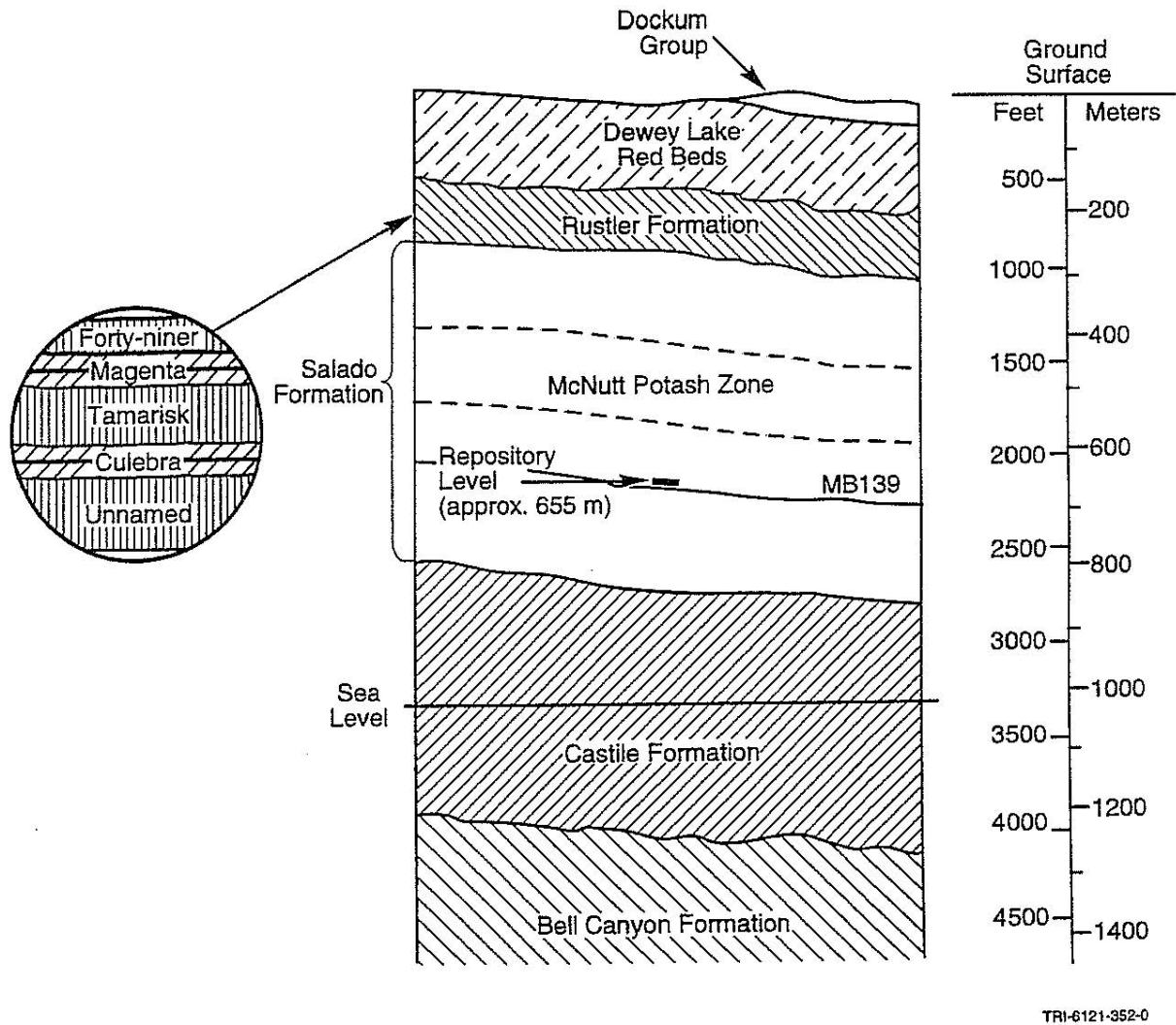


**Figure G2-2**  
**Location of the WIPP in the Delaware Basin**

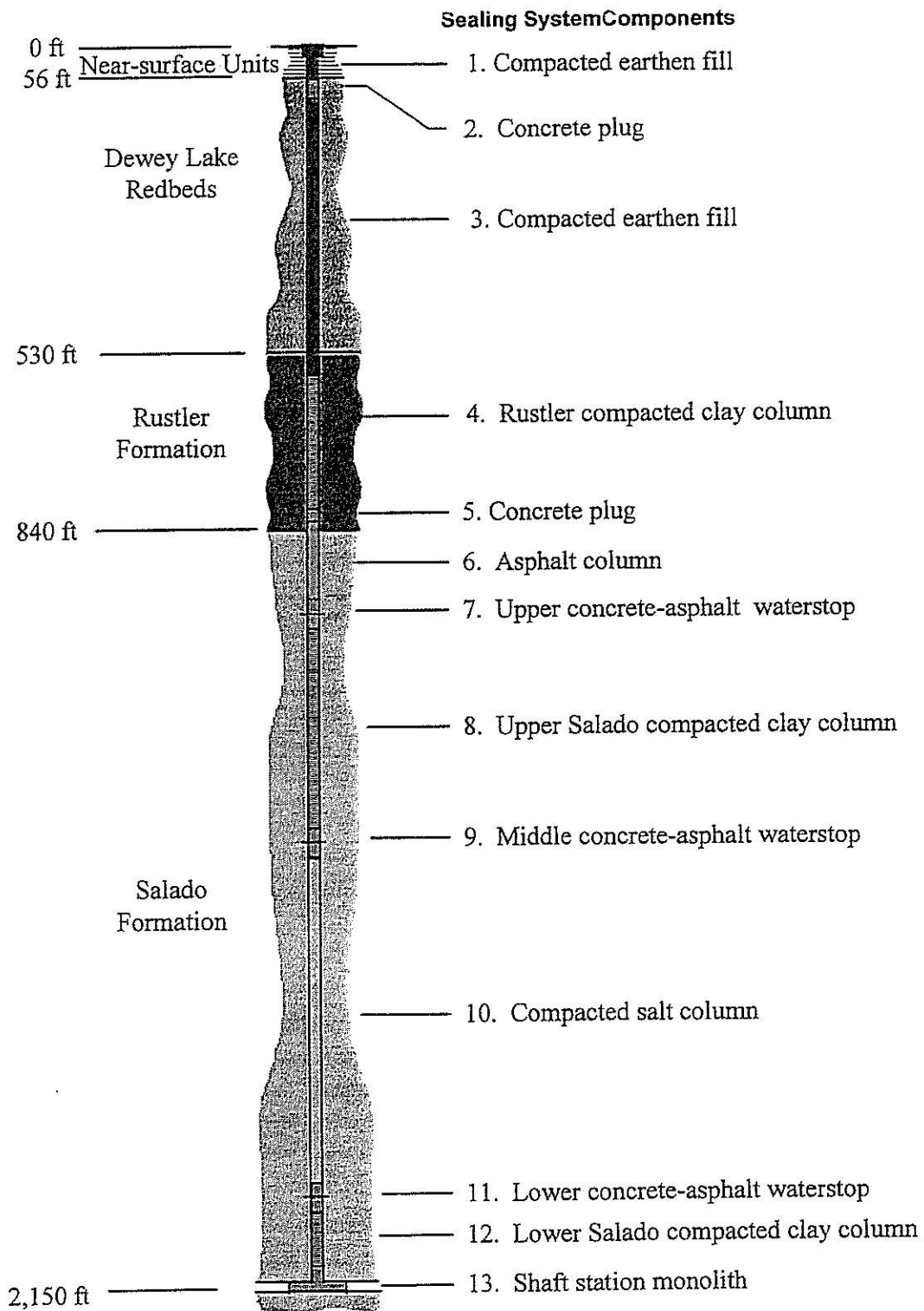
Erathem	System	Series	Lithostratigraphic Unit	Age Estimate (yr)
Cenozoic	Quaternary	Holocene	Windblown sand	~500,000
		Pleistocene	Mescalero caliche Gatufia Formation	~600,000
	Tertiary	Pliocene	Ogallala Formation	5.5 million
		Miocene		24 million
		Oligocene Eocene Paleocene	Absent in southeastern New Mexico	66 million
Mesozoic	Cretaceous	Upper	Absent in southeastern New Mexico	144 million
		Lower	Detritus preserved	
	Jurassic		Absent in southeastern New Mexico	208 million
		Triassic	Upper Lower	Dockum Group Absent in southeastern New Mexico
Paleozoic	Upper Permian	Ochoan	Dewey Lake Redbeds Rustler Formation Salado Formation Castile Formation	286 million
		Guadalupian	Capitan Limestone and Bell Canyon Formation	
	Lower Permian	Leonardian Wolfcampian	Bone Springs Wolfcamp (informal)	

Modified from Bachman, 1987

**Figure G2-3**  
**Chart Showing Major Stratigraphic Divisions, Southeastern New Mexico**

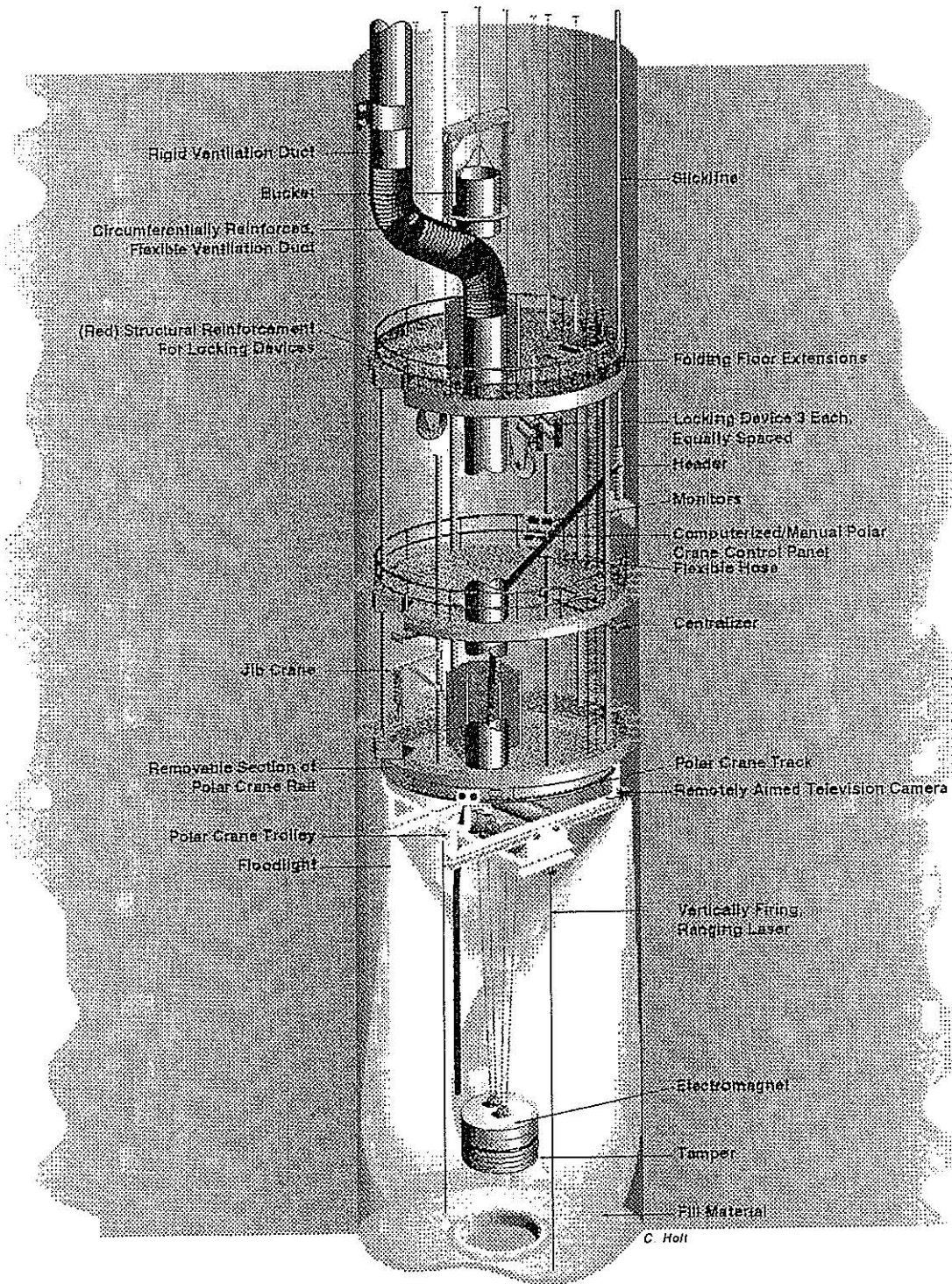


**Figure G2-4**  
**Generalized Stratigraphy of the WIPP Site Showing Repository Level**



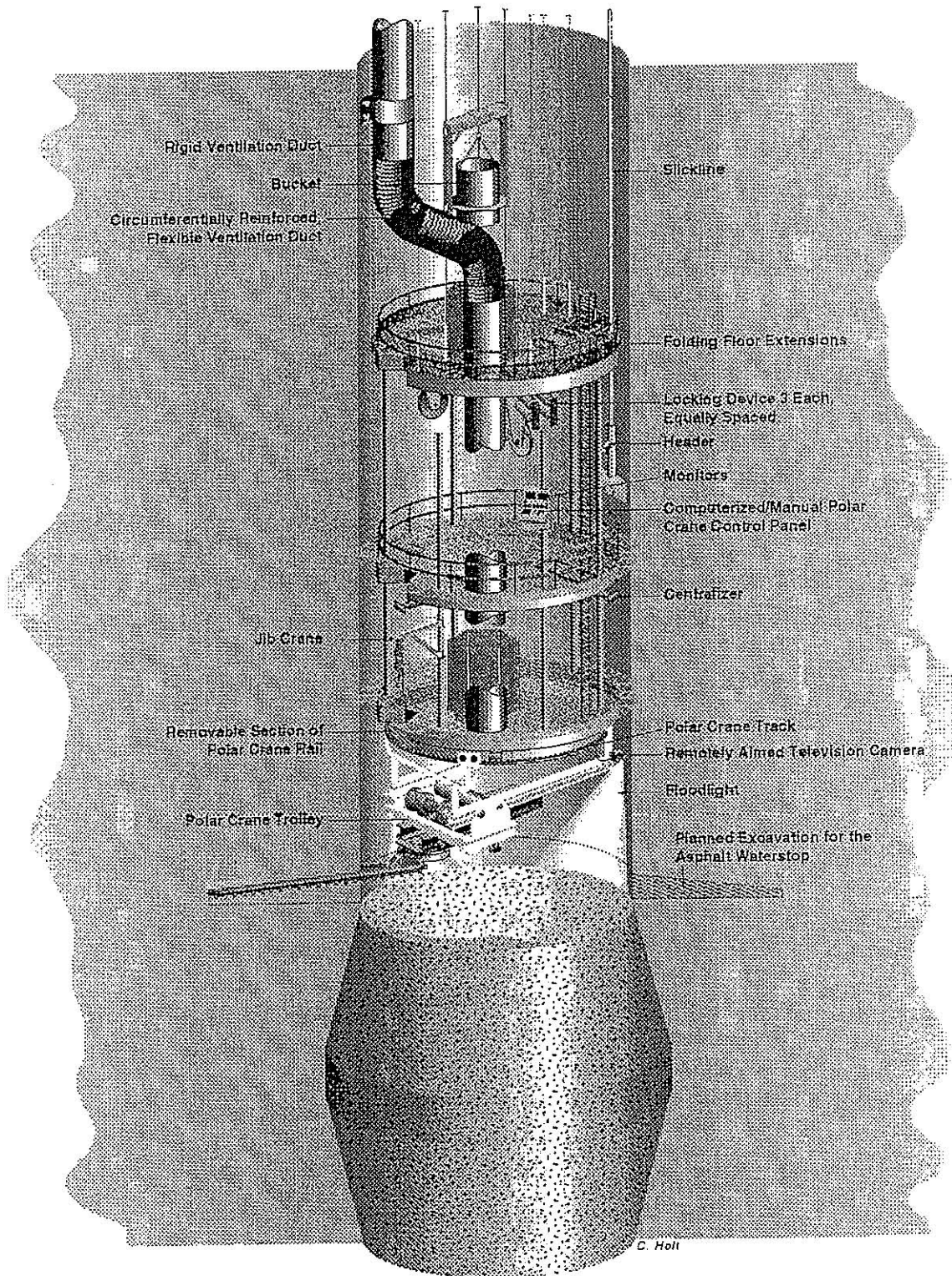
**Figure G2-5**  
**Arrangement of the Air Intake Shaft Sealing System**



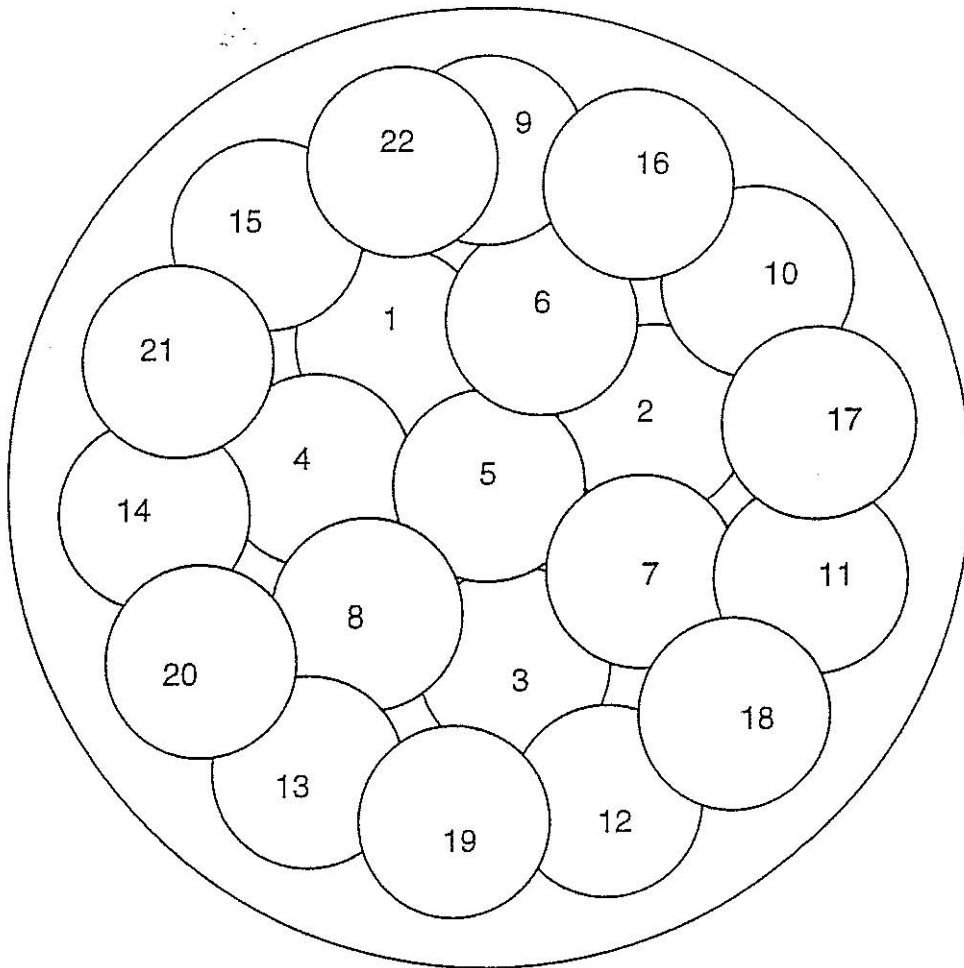


**Figure G2-6**  
**Multi-deck Stage Illustrating Dynamic Compaction**





**Figure G2-7**  
**Multi-deck Stage Illustrating Excavation for Asphalt Waterstop**

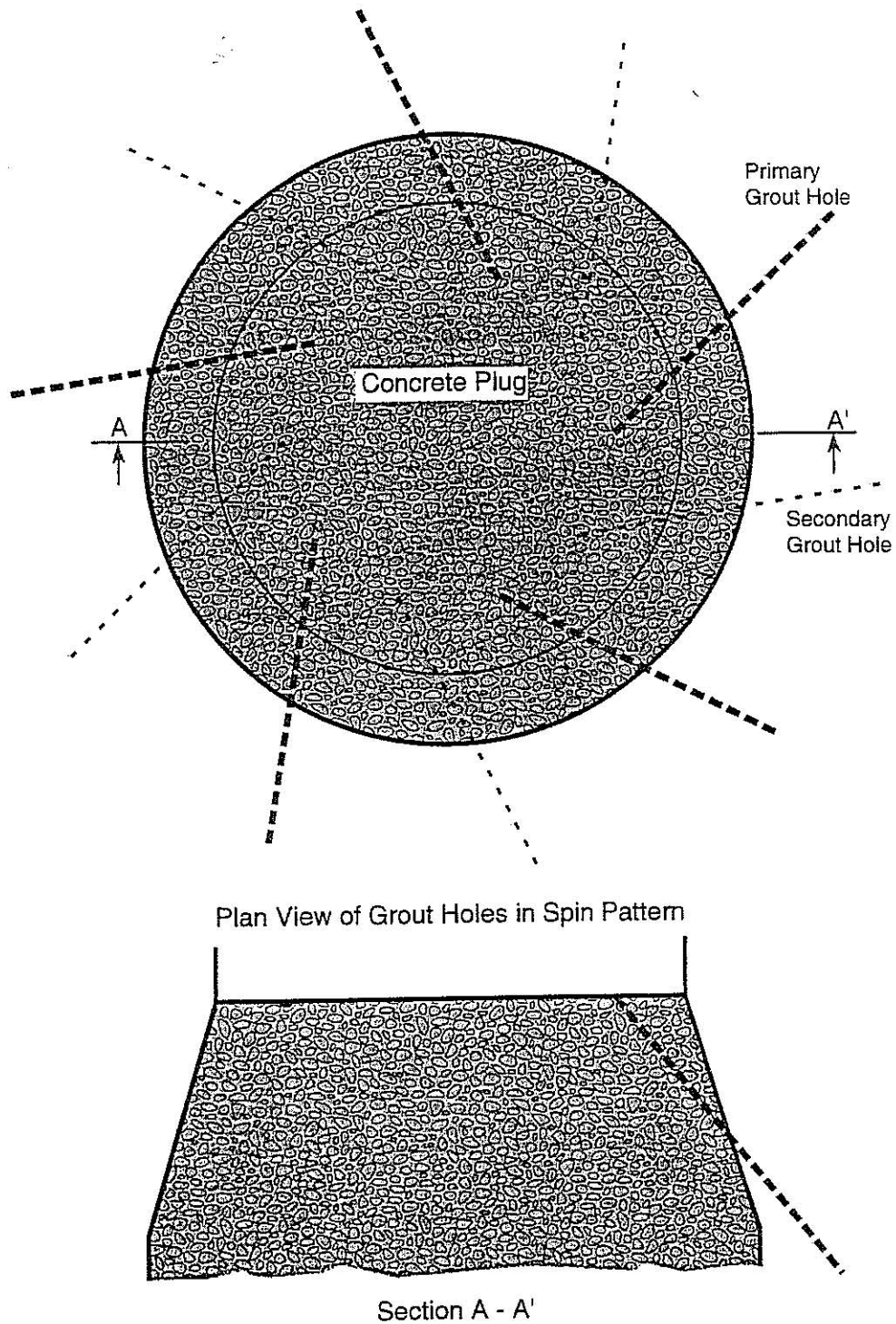


Scale: 1" = 4'

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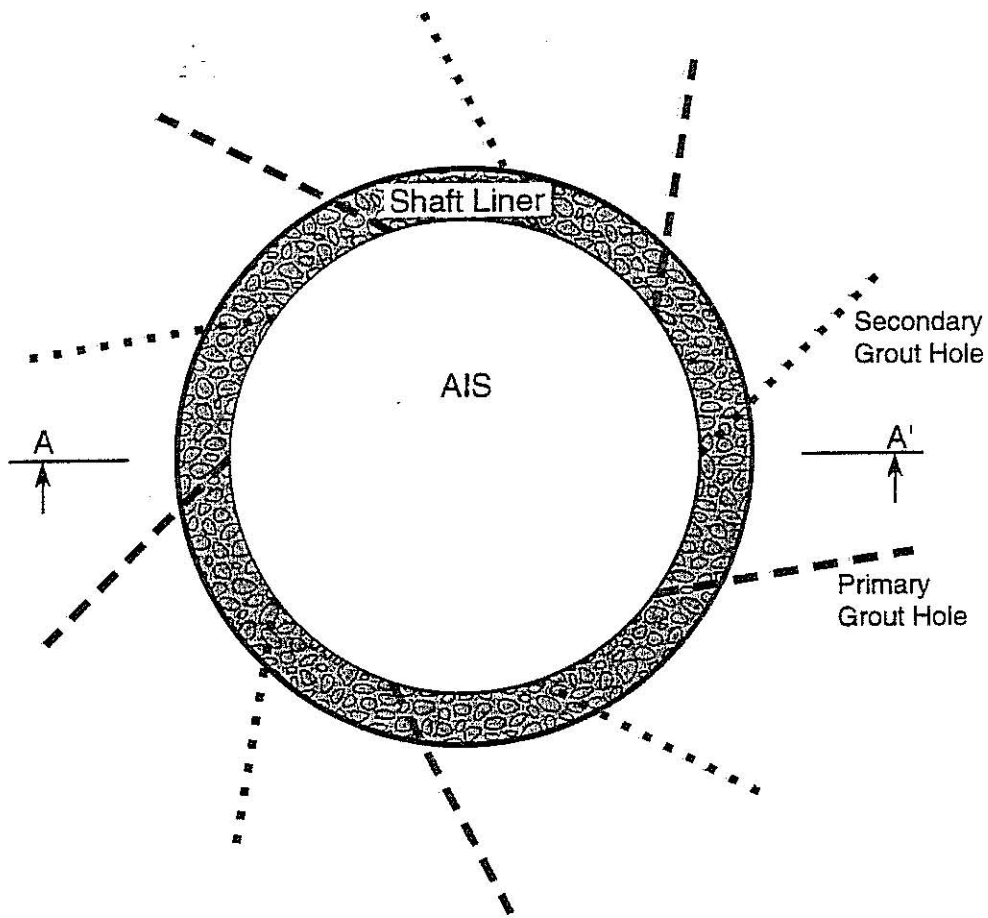
**Figure G2-8**  
**Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper**



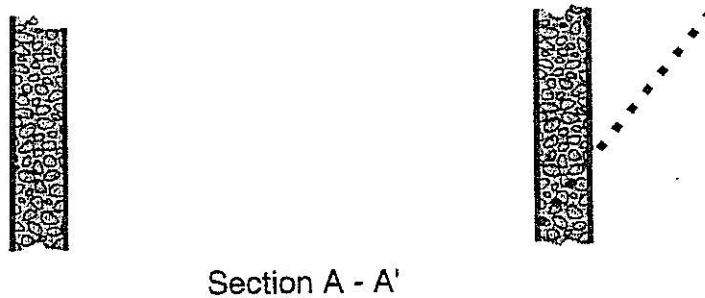


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**Figure G2-9**  
**Plan and Section Views of Downward Spin Pattern of Grout Holes**



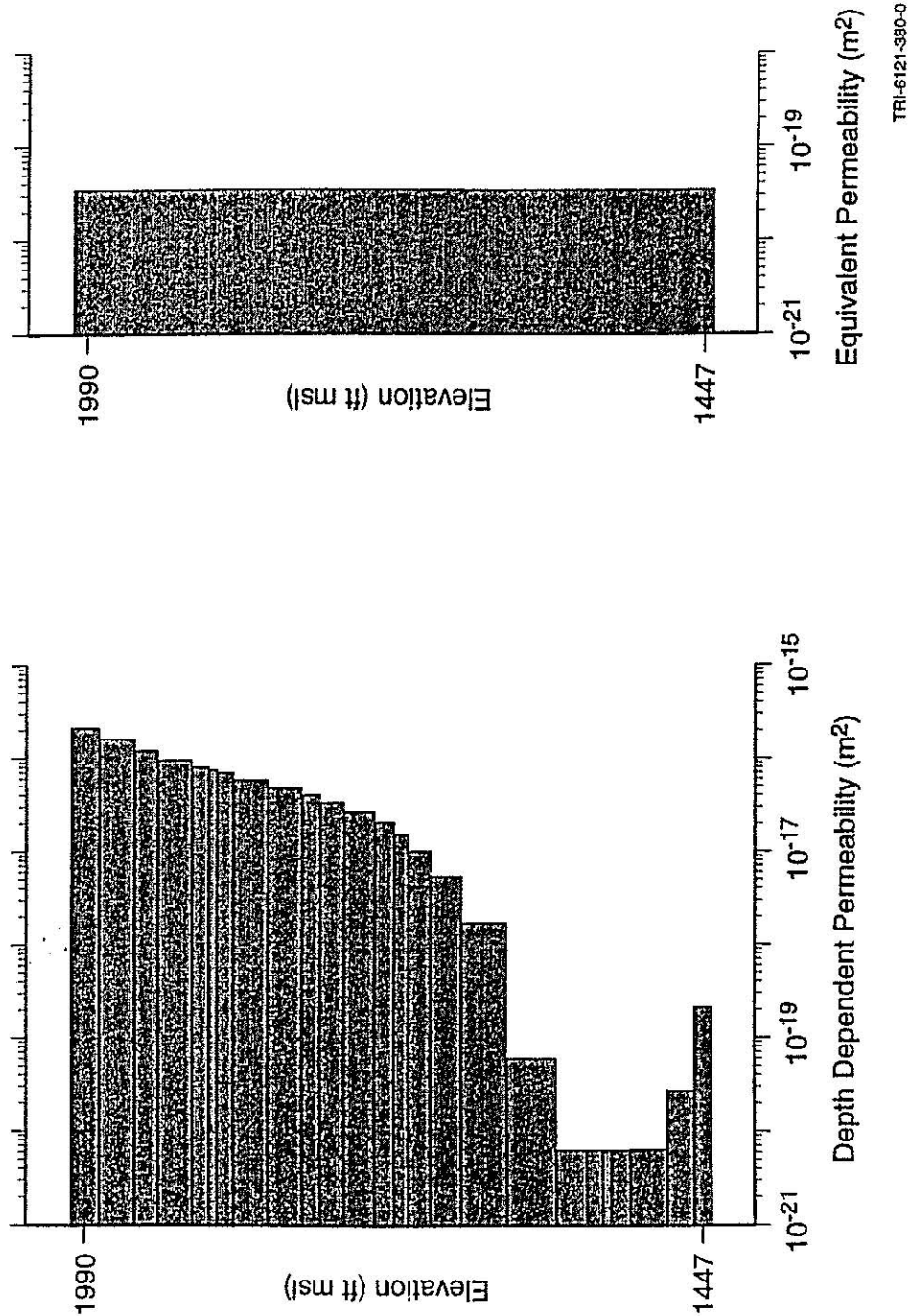
Plan View of Grout Holes in Spin Pattern



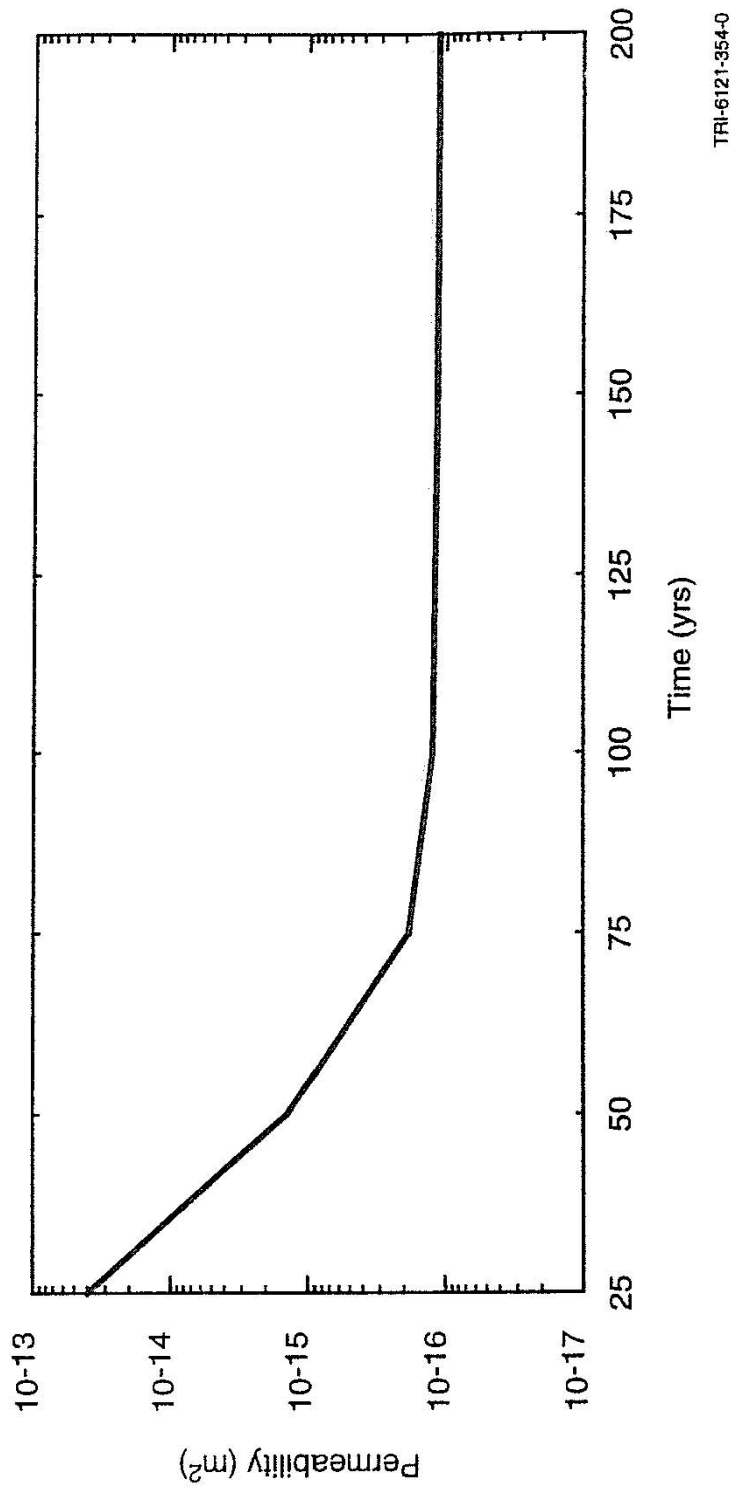
Section A - A'

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**Figure G2-10**  
**Plan and Section Views of Upward Spin Pattern of Grout Holes**



**Figure G2-11**  
 Example of Calculation of an Effective Salt Column Permeability from the Depth-Dependent Permeability at a Point in Time



**Figure G2-12**  
**Effective Permeability of the Compacted Salt Column using the 95% Certainty Line**

**ATTACHMENT G2  
APPENDIX G2-A**

**MATERIAL SPECIFICATION**

**SHAFT SEALING SYSTEM  
COMPLIANCE SUBMITTAL DESIGN REPORT**

**ATTACHMENT G2  
APPENDIX G2-A**

**MATERIAL SPECIFICATION**

**SHAFT SEALING SYSTEM  
COMPLIANCE SUBMITTAL DESIGN REPORT**

**Appendix A Abstract**

This appendix specifies material characteristics for shaft seal system components designed for the Waste Isolation Pilot Plant. The shaft seal system will not be constructed for decades; however, if it were to be constructed in the near term, materials specified here could be placed in the shaft and meet performance specifications. A material specification is necessary today to establish a frame of reference for design and analysis activities and to provide a basis for seal material parameters. This document was used by three integrated working groups: (1) the architect/engineer for development of construction methods and supporting infrastructure, (2) fluid flow and structural analysis personnel for evaluation of seal system adequacy, and (3) technical staff to develop probability distribution functions for use in performance assessment. The architect/engineers provide design drawings, construction methods and schedules as appendices to the final shaft seal system design report, called the *Compliance Submittal Design Report* (Permit Attachment G2). Similarly, analyses of structural aspects of the design and fluid flow calculations comprise other appendices to the final design report (not included in this Permit Attachment). These products together are produced to demonstrate the adequacy of the shaft seal system to independent reviewers, regulators, and stakeholders. It is recognized that actual placement of shaft seals is many years in the future, so design, planned construction method, and components will almost certainly change between now and the time that detailed construction specifications are prepared for the bidding process. Specifications provided here are likely to guide future work between now and the time of construction, perhaps benefiting from optimization studies, technological advancements, or experimental demonstrations.



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## 1 A1. INTRODUCTION

2 This appendix provides a body of technical information for each of the WIPP shaft seal system  
3 materials identified in the text of the *Compliance Submittal Design Report* (Permit Attachment  
4 G2). This material specification characterizes each seal material, establishes why it will function  
5 adequately, states briefly how each component will be placed, and quantifies expected  
6 characteristics, particularly permeability, pertinent to a WIPP-specific shaft seal design. Each  
7 material is first described from an engineering viewpoint, then appropriate properties are  
8 summarized in tables and figures which emphasize permeability parameter distribution functions  
9 used in performance calculations. Materials are discussed beyond limits normally found in  
10 conventional construction specifications. Descriptive elements focus on stringent shaft seal  
11 system requirements that are vital to regulatory compliance demonstration. Information normally  
12 contained in an engineering *performance specification* is included because more than one  
13 construction method, or even a completely different material, may function adequately. Content  
14 that would eventually be included contractually in *specifications for materials* or *specifications*  
15 *for workmanship* are not included in detail. The goal of these specifications is to substantiate  
16 why materials used in this seal system design will limit fluid flow and thereby adequately limit  
17 releases of hazardous constituents from the WIPP site at the point of compliance defined in  
18 Permit Part 5 and limit releases of radionuclides at the regulatory boundary.

19 Figure G2A-1 is a schematic drawing of the proposed WIPP shaft sealing system. Design detail  
20 and other characteristics of the geologic, hydrologic and chemical setting are provided in the  
21 main body of Permit Attachment G2, other appendices, and references. The four shafts will be  
22 entirely filled with dense materials possessing low permeability and other desirable engineering  
23 and economic attributes. Seal materials include concrete, clay, asphalt, and compacted salt.  
24 Other construction and fill materials include cementitious grout and earthen fill. The level of  
25 detail included for each material, and the emphasis of detail, vary among the materials.  
26 Concrete, clay, and asphalt are common construction materials used extensively in hydrologic  
27 applications. Their descriptions will be rather complete, and performance expectations will be  
28 drawn from the literature and site-specific references. Portland cement concrete is the most  
29 common structural material being proposed for the WIPP shaft seal system and its use has a  
30 long history. Considerable specific detail is provided for concrete because it is salt-saturated.  
31 Clay is used extensively in the seal system. Clay is often specified in industry as a construction  
32 material, and bentonitic clay has been widely specified as a low permeability liner for hazardous  
33 waste sites. Therefore, a considerable body of information is available for clay materials,  
34 particularly bentonite. Asphalt is a widely used paving and waterproofing material, so its  
35 specification here reflects industry practice. It has been used to seal shaft linings as a filler  
36 between the concrete and the surrounding rock, but has not been used as a full shaft seal  
37 component. Compaction and natural reconsolidation of crushed salt are uniquely applied here.  
38 Therefore, the crushed salt specification provides additional information on its constitutive  
39 behavior and sealing performance. Cementitious grout is also specified in some detail because  
40 it has been developed and tested for WIPP-specific applications and similar international waste  
41 programs. Earthen fill will be given only cursory specifications here because it has little impact  
42 on the shaft seal performance and placement to nominal standards is easily attained.

43 Discussion of each material is divided into sections, which are described in the annotated  
44 bullets below:

1 *Functions*

2 A general summary of functions of specific seal components is presented. Each seal component  
3 must function within a natural setting, so design considerations embrace naturally occurring  
4 characteristics of the surrounding rock.

5 *Material Characteristics*

6 Constitution of the seal material is described and key physical, chemical, mechanical,  
7 hydrological, and thermal features are discussed.

8 *Construction*

9 A brief mention is made regarding construction, which is more thoroughly treated in Appendix B  
10 of the *Compliance Submittal Design Report* (Permit Attachment G2, Appendix B). Construction,  
11 as discussed in this section, is primarily concerned with proper placement of materials. A viable  
12 construction procedure that will attain placement specifications is identified, but such a  
13 specification does not preclude other potential methods from use when the seal system is  
14 eventually constructed.

15 *Performance Requirements*

16 Regulations to which the WIPP must comply do not provide quantitative specifications  
17 applicable to seal design. Performance of the WIPP repository is judged against performance  
18 standards for miscellaneous units specified in 20.4.1.500 NMAC (incorporating 40 CFR  
19 §264.601) for releases of hazardous constituents at the point of compliance defined in Permit  
20 Part 5. Performance is also judged against potential releases of radionuclides at the regulatory  
21 boundary, which is a probabilistic calculation. To this end, probability distribution functions for  
22 permeabilities (referred to as PDFs) of each material have been derived for performance  
23 assessment of the WIPP system and are included within this subsection on performance  
24 requirements.

25 *Verification Methods*

26 It must be assured that seal materials placed in the shaft meet specifications. Both design and  
27 selection of materials reflect this principal concern. Assurance is provided by quality control  
28 procedures, quality assurance protocol, real-time testing, demonstrations of technology before  
29 construction, and personnel training. Materials and construction procedures are kept relatively  
30 simple, which creates robustness within the overall system. In addition, elements of the seal  
31 system often are extensive in length, and construction will require years to complete. If atypical  
32 placement of materials is detected, corrections can be implemented without impacting  
33 performance. These specifications limit in situ testing of seal material as it is constructed  
34 although, if it is later determined to be desirable, certain in situ tests can be amended in  
35 construction specifications. Invasive testing has the potential to compromise the material, add  
36 cost, and create logistic and safety problems. Conventional specifications are made for property  
37 testing and quality control.

1 **References**

2 These specifications draw on a wealth of information available for each material. Reference to  
3 literature values, existing data, anecdotal information, similar applications, laboratory and field  
4 testing, and other applicable supportive documentation is made.

5 **A1.1 Sealing Strategy**

6 The shaft seal system design is an integral part of compliance with 20.4.1.500 NMAC  
7 (incorporating 40 CFR §264) and 40 CFR §191. The EPA has also promulgated 40 CFR §194,  
8 entitled “Criteria for the Certification and Re-certification of the Waste Isolation Pilot Plant’s  
9 Compliance with the 40 CFR Part 191,” to which this design and these specifications are  
10 responsive. Other seal design requirements, such as State of New Mexico regulations, apply to  
11 stratigraphy above the Salado.

12 Compliance of the site with 20.4.1.500 NMAC (incorporating 40 CFR §264) and 40 CFR §191  
13 will be determined in part by the ability of the seal system to limit migration of hazardous  
14 constituents to the point of compliance defined in Permit Part 5, and migration of radionuclides  
15 to the regulatory boundary. Both natural and engineered barriers may combine to form the  
16 isolation system, with the shaft seal system forming an engineered barrier in a natural setting.  
17 Seal system materials possess high durability and compatibility with the host rock. All materials  
18 used in the shaft seal system are expected to maintain their integrity for very long periods. The  
19 system contains functional redundancy and uses differing materials to reduce uncertainty in  
20 performance. Some sealing components are used to retard fluid flow soon after placement,  
21 while other components are designed to function well beyond the regulatory period.  
22 International programs engaged in research and demonstration of sealant technology provide  
23 significant information on longevity of materials similar to those proposed for this shaft seal  
24 system (Gray, 1993). When this information is applied to the setting and context of the WIPP,  
25 there is strong evidence that the materials specified will maintain their positive attributes for  
26 defensibly long periods.

27 **A1.2 Longevity**

28 Longevity of materials is considered within the site geologic and hydrologic setting as  
29 summarized in the main body of this report (Permit Attachment G2) and described in the Seal  
30 System Design Report (DOE, 1995). A major environmental advantage of the WIPP locality is  
31 an overall lack of groundwater to seal against. In terms of sealing the WIPP site, the  
32 stratigraphy can be conveniently divided into the Salado Formation and the superincumbent  
33 formations comprising primarily the Rustler Formation and the Dewey Lake Redbeds. The  
34 Salado Formation, composed mainly of evaporite sequences dominated by halite, is nearly  
35 impermeable. Transmissivity of engineering importance in the Salado Formation is lateral along  
36 anhydrite interbeds, basal clays, and fractured zones near underground openings. Neither the  
37 Dewey Lake Redbeds nor the Rustler Formation contains regionally productive sources of  
38 water, although seepage near the surface in the Exhaust Shaft has been observed. Permeability  
39 of materials placed in the Salado below the contact with the Rustler, and their effects on the  
40 surrounding disturbed rock zone, are the primary engineering properties of concern. Even  
41 though very little regional water is present in the geologic setting, the seal system reflects great  
42 concern for groundwater’s potential influence on materials comprising the shaft seal system.

1 Shaft seal materials have been selected in part because of their exceptional durability.  
2 However, it is recognized that brine chemistry *could* impact engineered materials if conditions  
3 permitted. Highly concentrated saline solutions can, under severe circumstances, affect  
4 performance of cementitious materials and clay. Concrete has been shown to degrade under  
5 certain conditions, and clays can be more transmissive to brine than to potable water. Asphalt  
6 and compacted salt are essentially chemically inert to brine. Although stable in naturally  
7 occurring seeps such as those in the Santa Barbara Channel (California), asphalt can degrade  
8 when subjected to ultraviolet light or through microbial activity. Brine would not chemically  
9 change the compacted salt column, but mechanical effects of pore pressure are of concern to  
10 reconsolidation. Mechanical influences of brine on the reconsolidating salt column are  
11 discussed in Sections 7 and 8 of the main report (Permit Attachment G2), which summarize  
12 Appendices D and C, respectively (Appendices C and D are not included in the Permit, but are  
13 contained in *Waste Isolation Pilot Plant Shaft Sealing System Compliance Submittal Design*  
14 *Report* (“*Compliance Submittal Design Report*”) (Sandia, 1996)).

15 Because of limited volumes of brine, low hydraulic gradients, and low permeability materials, the  
16 geochemical setting will have little influence on shaft seal materials. Each material is durable,  
17 though the potential exists for degradation or alteration under extreme conditions. For example,  
18 the three major components of portland cement concrete, portlandite ( $\text{Ca}(\text{OH})_2$ ), calcium-  
19 aluminate-hydrate (CAH) and calcium-silicate-hydrate (CSH), are not thermodynamically  
20 compatible with WIPP brines. If large quantities of high ionic strength brine were available and  
21 transport of mass was possible, degradation of cementitious phases would certainly occur. Such  
22 a localized phenomenon was observed on a construction joint in the liner of the Waste Handling  
23 Shaft at the WIPP site. Within the shaft seal system, however, the hydrologic setting does not  
24 support such a scenario. Locally brine will undoubtedly contact the surface of mass placements  
25 of concrete. A low hydrologic gradient will limit mass transport, although degradation of paste  
26 constituents is expected where brine contacts concrete.

27 Among longevity concerns, degradation of concrete is the most recognized. At this stage of the  
28 design, it is established that only small volumes of brine ever reach the concrete elements (see  
29 Section 8). Further analysis concerned with borehole plugging using cementitious materials  
30 shows that at least 100 pore volumes of brine in an open system would be needed to begin  
31 degradation processes. In a closed system, such as the hydrologic setting in the WIPP shafts,  
32 phase transformations create a degradation product of increased volume. Net volume increase  
33 owing to phase transformation in the absence of mass transport would decrease rather than  
34 increase permeability of concrete seal elements.

35 Mechanical and chemical stability of clays, in this case the emphasis is on bentonitic clay, is  
36 particularly favorable in the WIPP geochemical and hydrological environment. A compendium of  
37 recent work associated with the Stripa project in Sweden (Gray, 1993) provides field-scale  
38 testing results, supportive laboratory experimental data, and thermodynamic modeling that lead  
39 to a conclusion that negligible transformation of the bentonite structure will occur over the  
40 regulatory period of the WIPP. In fact, very little brine penetration into clay components is  
41 expected, based on intermediate-scale experiments at WIPP. Any wetting of bentonite will result  
42 in development of swelling pressure, a favorable situation that would accelerate return to a  
43 uniform stress state within the clay component.

44 Natural bentonite is a stable material that generally will not change significantly over a period of  
45 ten thousand years. Bentonitic clays have been widely used in field and laboratory experiments  
46 concerned with radioactive waste disposal. As noted by Gray (1993), three internal

1 mechanisms, illitization, silicification and charge change, could affect sealing properties of  
2 bentonite. Illitization and silicification are thermally driven processes and, following discussion  
3 by Gray (1993), are not possible in the environment or time-frame of concern at the WIPP. The  
4 naturally occurring Wyoming bentonite which is the specified material for the WIPP shaft seal is  
5 well over a million years old. It is, therefore, highly unlikely that metamorphism of bentonite  
6 enters as a design concern.

7 Asphalt has existed for thousands of years as natural seeps. Longevity studies specific to  
8 DOE's Hanford site have utilized asphalt artifacts buried in ancient ceremonies to assess long-  
9 term stability (Wing and Gee, 1994). Asphalt used as a seal component deep in the shaft will  
10 inhabit a benign environment, devoid of ultraviolet light or an oxidizing atmosphere. Additional  
11 assurance against possible microbial degradation in asphalt elements is mitigated with addition  
12 of lime. For these reasons, it is thought that design characteristics of asphalt components will  
13 endure well beyond the regulatory period.

14 Materials being used to form the shaft seals are the same as those being suggested in the  
15 scientific and engineering literature as appropriate for sealing deep geologic repositories for  
16 radioactive wastes. This fact was noted during independent technical review. Durability or  
17 longevity of seal components is a primary concern for any long-term isolation system. Issues of  
18 possible degradation have been studied throughout the international community and within  
19 waste isolation programs in the USA. Specific degradation studies are not detailed in this  
20 document because longevity is one of the over-riding attributes of the materials selected and  
21 degradation is not perceived to be likely. However, it is acknowledged here that microbial  
22 degradation, seal material interaction, mineral transformation, such as silicification of bentonite,  
23 and effects of a thermal pulse from asphalt or hydrating concrete remain areas of continued  
24 study.

## 25 **A2. MATERIAL SPECIFICATIONS**

26 The WIPP shaft seal system plays an important role in meeting regulatory requirements such as  
27 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.601) and 40 CFR 191. A  
28 combination of available, durable materials which can be emplaced with low permeability is  
29 proposed as the seal system. Components include mass concrete, asphalt waterstops  
30 sandwiched between concrete plugs, a column of asphalt, long columns of compacted clay, and  
31 a column of compacted crushed WIPP salt. The design is based on common materials and  
32 construction technologies that could be implemented using today's technology. In choosing  
33 materials, emphasis was given to permeability characteristics and mechanical properties. The  
34 function, constitution, construction, performance, and verification of each material are given in  
35 the following sections.

### 36 **A2.1 Mass Concrete**

37 Concrete has exceptionally low permeability and is widely used for hydraulic applications such  
38 as water storage tanks, water and sewer systems, and massive dams. Salt-saturated concrete  
39 has been used successfully as a seal material in potash and salt mining applications. Upon  
40 hydration, unfractured concrete is nearly impermeable, having a permeability less than  $10^{-20}$  m<sup>2</sup>.  
41 In addition, concrete is a primary structural material used for compression members in countless  
42 applications. Use of concrete as a shaft seal component takes advantage of its many attributes  
43 and the extensive documentation of its use.



1 This specification for mass concrete will discuss a special design mixture of a salt-saturated  
2 concrete called Salado Mass Concrete or SMC (Wakeley et al., 1995). Performance of SMC  
3 and similar salt-saturated mixtures is established and will be completely adequate for concrete  
4 applications within the WIPP shafts. Because concrete is such a widely used material, it has  
5 been written into specifications many times. Therefore, the specification for SMC contains  
6 recognized standard practices, established test methods, quality controls, and other details that  
7 are not available at a similar level for other seal materials. Use of salt-saturated concrete,  
8 especially SMC, is backed by extensive laboratory and field studies that establish performance  
9 characteristics far exceeding requirements of the WIPP shaft seal system.

#### 10 **A2.1.1 Functions**

11 The function of the concrete is to provide a durable component with small void volume,  
12 adequate structural compressive strength, and low permeability. Concrete components appear  
13 within the shaft seal system at the very bottom, the very top, and several locations in between  
14 where they provide a massive plug that fills the opening and a tight interface between the plug  
15 and host rock. In addition, concrete is a rigid material that will support overlying seal  
16 components while promoting natural healing processes within the salt disturbed rock zone (the  
17 DRZ is discussed further in Appendix D of the Compliance Submittal Design Report (Sandia,  
18 1996)).

19 Concrete is one of the redundant components that protects the reconsolidating salt column.  
20 Since the salt column will achieve low permeabilities in fewer than 100 years (see Section 2.4.4  
21 of this specification), concrete would no longer be needed after that time. For purposes of  
22 performance assessment calculations, a change in concrete permeability to degraded values is  
23 “allowed” to occur. However, concrete within the Salado Formation is likely to endure throughout  
24 the regulatory period with sustained engineering properties.

25 All concrete sealing elements, with the exception of a possible concrete cap, are unreinforced.  
26 In conventional civil engineering design, reinforcement is used to resist tensile stresses since  
27 concrete is weak in tension and reinforcement bar (rebar) balances tensile stresses in the steel  
28 with compressive stresses in concrete. However, concrete has exceptional compressive  
29 strength, and all the states of stress within the shaft will be dominated by compressive stress.  
30 Mass concrete, by definition, is related to any volume of concrete where heat of hydration is a  
31 design concern. SMC is tailored to minimize heat of hydration and overall differential  
32 temperature. An analysis of hydration heat distribution is included in Appendix D of the  
33 Compliance Submittal Design Report (Sandia, 1996). Boundary conditions are favorable for  
34 reducing any possible thermally induced tensile cracking during the hydration process.

#### 35 **A2.1.2 Material Characteristics**

36 Salt-saturated concrete contains sufficient salt as an aggregate to saturate hydration water with  
37 respect to NaCl. Salt-saturated concrete is required for all uses within the Salado Formation  
38 because fresh water concrete would dissolve part of the host rock. Dissolution would cause a  
39 poor bond and perhaps a more porous interface, at least initially.

40 Dry materials for SMC include cementitious materials, fine and coarse aggregates, and sodium  
41 chloride. Concrete mixture proportions of materials for one cubic yard of concrete appear in  
42 Table A-1.

1  
2

**Table A-1  
 Concrete Mixture Proportions**

<b>Material</b>	<b>lb/yd<sup>3</sup></b>
Portland cement	278
Class F fly ash	207
Expansive cement	134
Fine aggregate	1292
Coarse aggregate	1592
Sodium chloride	88
Water	225

kg/m<sup>3</sup> = (lb/yd<sup>3</sup>) \* (0.59). Water: Cement Ratio is weight of water divided by all cementitious materials.

3 Table A-2 is a summary of standard specifications for concrete materials. Further discussion of  
 4 each specification is presented in subsequent text, where additional specifications pertinent to  
 5 particular concrete components are also given.

6  
7

**Table A-2  
 Standard Specifications for Concrete Materials**

<b>Material</b>	<b>Applicable Standard Tests and Specifications</b>	<b>Comments</b>
Class H oilwell cement	American Petroleum Institute Specification 10	Chemical composition determined according to ASTM C 114
Class F fly ash	ASTM C 618, Standard Specification for Fly Ash	Composition and properties determined according to ASTM C 311
Expansive cement	Similar to ASTM C 845	Composition determined according to ASTM C 114
Salt	ASTM E 534, Chemical Analysis of Sodium Chloride	Batched as dry ingredient, not as an admixture
Coarse and fine aggregates	ASTM C 33, Standard Specification for Concrete Aggregates; ASTM C 294 and C 295 also applied	Moisture content determined by ASTM C 566

8 **Portland cement** shall conform to American Petroleum Institute (API) Specification 10 Class G  
 9 or Class H. Additional requirements for the cement are that the fineness as determined  
 10 according to ASTM C 204 shall not exceed 300 m<sup>2</sup>/kg, and the cement must meet the  
 11 requirement in ASTM C 150 for moderate heat of hydration.

12 **Fly Ash** shall conform to ASTM C 618, Class F, with the additional requirement that the  
 13 percentage of Ca cannot exceed 10 %.

14 **Expansive cement** for shrinkage-compensation shall have properties so that, when used with  
 15 portland cement, the resulting blend is shrinkage compensating by the mechanism described in  
 16 ASTM C 845 for Type K cement. Additional requirements for chemical composition of the  
 17 shrinkage compensating cement appear in Table A-3.

1  
2  
**Table A-3**  
**Chemical Composition of Expansive Cement**

<b>Chemical composition</b>	<b>Weight %</b>
Magnesium oxide, max	1.0
Calcium oxide, min	38.0
Sulfur trioxide, max	28.0
Aluminum trioxide (AL <sub>2</sub> O <sub>3</sub> ), min	7.0
Silicon dioxide, min	7.0
Insoluble residue, max	1.0
Loss on ignition, max	12.0

3 **Sodium Chloride** shall be of a technical grade consisting of a minimum of 99.0 % sodium  
4 chloride as determined according to ASTM E 534, and shall have a maximum particle size of  
5 600 µm.

6 **Aggregate** proportions are reported here on saturated surface-dry basis. Specific gravity of  
7 coarse and fine aggregates used in these proportions were 2.55 and 2.58, respectively.  
8 Absorptions used in calculations were 2.25 (coarse) and 0.63 (fine) % by mass. Concrete  
9 mixture proportions will be adjusted to accommodate variations in the materials selected,  
10 especially differences in specific gravity and absorptions of aggregates. Fine aggregate shall  
11 consist of natural silica sand. Coarse aggregate shall consist of gravel. The quantity of flat and  
12 elongated particles in the separate size groups of coarse aggregates, as determined by ASTM  
13 D 4791, using a value of 3 for width-thickness ratio and length-width ratio, shall not exceed 25  
14 % in any size group. Moisture in the fine and coarse aggregate shall not exceed 0.1 % when  
15 determined in accordance with ASTM C 566. Aggregates shall meet the requirements listed in  
16 Table A-4.

### 17 **A2.1.3 Construction**

18 Construction techniques include surface preparation of mass concrete and slickline (a drop pipe  
19 from the surface) placement at depth within the shaft. A batching and mixing operation on the  
20 surface will produce a wet mixture having initial temperatures not exceeding 20°C. Placement  
21 uses a tremie line, where the fresh concrete exits the slickline below the surface level of the  
22 concrete being placed. This procedure will minimize entrained air. Placement requires no  
23 vibration and, except for the large concrete monolith at the base of each shaft, no form work. No  
24 special curing is required for the concrete because its natural environment ensures retention of  
25 humidity and excellent hydration conditions. It is desired that each concrete pour be continuous,  
26 with the complete volume of each component placed without construction joints. However, no  
27 perceivable reduction in performance is anticipated if, for any reason, concrete placement is  
28 interrupted. A free face or cold joint could allow lateral flow but would remain perpendicular to  
29 flow down the shaft. Further discussion of concrete construction is presented in Permit  
30 Attachment G2, Appendix B.



1  
2

**Table A-4**  
**Requirements for Salado Mass Concrete Aggregates**

Property	Fine Aggregate	Coarse Aggregate
Specific Gravity (ASTM C 127, ASTM C 128)	2.65, max	2.80, max
Absorption (ASTM C 127, ASTM C 128)	1.5 percent, max	3.5 percent, max
Clay Lumps and Friable Particles (ASTM C 142)	3.0 percent, max	3.0 percent, max
Material Finer than 75- $\mu$ m (No. 200) Sieve (ASTM C 117)	3.0 percent, max	1.0 percent, max
Organic Impurities (ASTM C 40)	No. 3, max	N/A
L.A. Abrasion (ASTM C 131, ASTM C 535)	N/A	50 percent, max
Petrographic Examination (ASTM C 295)	Carbonate mineral aggregates shall not be used	Carbonate rock aggregates shall not be used
Coal and Lignite, less than 2.00 specific gravity (ASTM C 123)	0.5 percent, max	0.5 percent, max

3 **A2.1.4 Performance Requirements**

4 Specifications of concrete properties include characteristics in the green state as well as the  
 5 hardened state. Properties of hydrated concrete include conventional mechanical properties and  
 6 projections of permeabilities over hundreds of years, a topic discussed at the end of this section.  
 7 Table A-5 summarizes target properties for SMC. Attainment of these characteristics has been  
 8 demonstrated (Wakeley et al., 1995). SMC has a strength of about 40 MPa at 28 days and  
 9 continues to gain strength after that time, as is typical of hydrating cementitious materials.  
 10 Concrete strength is naturally much greater than required for shaft seal elements because the  
 11 state of stress within the shafts is compressional with little shear stress developing. In addition,  
 12 compressive strength of SMC increases as confining pressure increases (Pfeifle et al., 1996).  
 13 Volume stability of the SMC is also excellent, which assures a good bond with the salt.

14 Thermal and constitutive models for the SMC are described in Appendix D of the Compliance  
 15 Submittal Design Report (Sandia, 1996). Thermal properties are fit to laboratory data and used  
 16 to calculate heat distribution during hydration. An isothermal creep law and an increasing  
 17 modulus are used to represent the concrete in structural calculations. The resistance  
 18 established by concrete to inward creep of the Salado Formation accelerates healing of  
 19 microcracks in the salt. The state of stress impinging on concrete elements within the Salado  
 20 Formation will approach a lithostatic condition.

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**Table A-5**  
**Target Properties for Salado Mass Concrete**

Property	Comment
Initial slump 10 ± 1.0 in. Slump at 2 hr 8 ± 1.5 in.	ASTM C 143, high slump needed for pumping and placement
Initial temperature ≤ 20°C	ASTM C 1064, using ice as part of mixing water
Air content ≤ 2.0%	ASTM C 231 (Type B meter), tight microstructure and higher strength
Self-leveling	Restrictions on underground placement may preclude vibration
No separately batched admixtures	Simple and reproducible operations
Adiabatic temperature rise ≤ 16°C at 28 days	To reduce thermally induced cracking
30 MPa (4500 psi) compressive strength	ASTM C 39, at 180 days after placement
Volume stability	ASTM C 157, length change between +0.05 and -0.02% through 180 days

3 Permeability of SMC is very low, consistent with most concretes. Owing to a favorable state of  
 4 stress and isothermal conditions, the SMC will remain intact. Because little brine is available to  
 5 alter concrete elements, minimal degradation is possible. Resistance to phase changes of salt-  
 6 saturated concretes and mortars within the WIPP setting has been excellent. These favorable  
 7 attributes combine to assure concrete elements within the Salado will remain structurally sound  
 8 and possess very low permeability for exceedingly long periods.

9 Permeabilities of SMC and other salt-saturated concretes have been measured in Small-Scale  
 10 Seal Performance Tests (SSSPT) and Plug Test Matrix (PTM) at the WIPP for a decade and  
 11 are corroborated by laboratory measurements (e.g., Knowles and Howard, 1996; Pfeifle et al.,  
 12 1996). From these tests, values and ranges of concrete permeability have been developed. For  
 13 performance assessments calculations, permeability of SMC seal components is treated as a  
 14 random variable defined by a log triangular distribution with a best estimator of  $1.78 \times 10^{-19} \text{ m}^2$   
 15 and lower and upper limits of  $2.0 \times 10^{-21}$  and  $1.0 \times 10^{-17} \text{ m}^2$ , respectively.

16 The probability distribution function is shown in Figure G2A-2. Further, it is recognized that  
 17 concrete function is required for only a relatively short-term period as salt reconsolidates.  
 18 Concrete is expected to function adequately beyond its design life. For calculational expediency,  
 19 a higher, very conservative permeability of  $1.0 \times 10^{-14}$  is assigned to concrete after 400 years.  
 20 This abrupt change in permeability does not imply degradation, but rather reflects system  
 21 redundancy and the fact that concrete is no longer relied on as a seal component.

22 **A2.1.5 Verification Methods**

23 The concrete supplier shall perform the inspection and tests described below (Tables A-6 and  
 24 A-7) and, based on the results of these inspections and tests, shall take appropriate action. The  
 25 laboratory performing verification tests shall be on-site and shall conform with ASTM C 1077.  
 26 Individuals who sample and test concrete or the constituents of concrete as required in this  
 27 specification shall have demonstrated a knowledge and ability to perform the necessary test  
 28 procedures equivalent to the ACI minimum guidelines for certification of Concrete Laboratory  
 29 Testing Technicians, Grade I. The Buyer will inspect the laboratory, equipment, and test

1 procedures for conformance with ASTM C 1077 prior to start of dry materials batching  
 2 operations and prior to restarting operations.

3 A2.1.5.1 Fine Aggregate

4 (A) *Grading*. Dry materials will be sampled while the batch plant is operating; there shall be a  
 5 sieve analysis and fineness modulus determination in accordance with ASTM C 136.

6 (B) *Fineness Modulus Control Chart*. Results for fineness modulus shall be grouped in sets of  
 7 three consecutive tests, and the average and range of each group shall be plotted on a control  
 8 chart. The upper and lower control limits for average shall be drawn 0.10 units above and below  
 9 the target fineness modulus, and the upper control limit for range shall be 0.20 units above the  
 10 target fineness modulus.

11 **Table A-6**  
 12 **Test Methods Used for Measuring Concrete Properties During and After Mixing**

Property	Test Method	Title
Slump	ASTM C 143	Slump of Portland Cement Concrete
Unit weight	ASTM C 138	Unit Weight, Yield, and Air Content (Gravimetric) of Concrete
Air content	ASTM C 231	Air Content of Freshly Mixed Concrete by the Pressure Method
Mixture temperature	ASTM C 1064	Temperature of Freshly Mixed Concrete

13 **Table A-7**  
 14 **Test Methods Used for Measuring Properties of Hardened Concrete**

Property	Test Method	Title
Compressive strength	ASTM C 39	Compressive Strength of Cylindrical Concrete Specimens
Modulus of elasticity	ASTM C 469	Static Modulus of Elasticity and Poisson's Ratio of Concrete in Compression
Volume stability	ASTM C 157	Length Change of Hardened Cement Mortar and Concrete

15 (C) *Corrective Action for Fine Aggregate Grading*. When the amount passing any sieve is  
 16 outside the specification limits, the fine aggregate shall be immediately resampled and retested.  
 17 If there is another failure for any sieve, the fact shall be immediately reported to the Buyer.  
 18 Whenever a point on the fineness modulus control chart, either for average or range, is beyond  
 19 one of the control limits, the frequency of testing shall be doubled. If two consecutive points are  
 20 beyond the control limits, the process shall be stopped and stock discarded if necessary.

21 (D) *Moisture Content Testing*. There shall be at least two tests for moisture content in  
 22 accordance with ASTM C 566 during each 8-hour period of dry materials batch plant operation.

23 (E) *Moisture Content Corrective Action*. Whenever the moisture content of fine aggregate  
 24 exceeds 0.1 % by weight, the fine aggregate shall be immediately resampled and retested. If  
 25 there is another failure the batching shall be stopped.

1    **A2.1.5.2    Coarse Aggregate**

2    **(A) Grading.** Coarse aggregate shall be analyzed in accordance with ASTM C 136.

3    **(B) Corrective Action for Grading.** When the amount passing any sieve is outside the  
4    specification limits, the coarse aggregate shall be immediately resampled and retested. If the  
5    second sample fails on any sieve, that fact shall be reported to the Buyer. Where two  
6    consecutive averages of five tests are outside specification limits, the dry materials batch plant  
7    operation shall be stopped, and immediate steps shall be taken to correct the grading.

8    **(C) Moisture Content Testing.** There shall be at least two tests for moisture content in  
9    accordance with ASTM C 566 during each 8-hour period of dry materials batch plant operation.

10   **(D) Moisture Content Corrective Action.** Whenever the moisture content of coarse aggregate  
11   exceed 0.1 % by weight, the coarse aggregate shall be immediately resampled and retested. If  
12   there is another failure, batching shall be stopped.

13   **A2.1.5.3    Batch-Plant Control**

14   The measurement of all constituent materials including cementitious materials, each size of  
15   aggregate, and granular sodium chloride shall be continuously controlled. The aggregate batch  
16   weights shall be adjusted as necessary to compensate for their nonsaturated surface-dry  
17   condition.

18   **A2.1.5.4    Concrete Products**

19   Concrete products will be tested during preparation and after curing as summarized in Tables A-  
20   6 and A-7 for preparation and hydrated concrete, respectively.

21   **A2.2    Compacted Clay**

22   Compacted clays are commonly proposed as primary sealing materials for nuclear waste  
23   repositories and have been extensively investigated (e.g., Gray, 1993). Compacted clay as a  
24   shaft sealing component provides a barrier to brine and possibly to gas flow into or out of the  
25   repository and supports the shaft with a high density material to minimize subsidence. In the  
26   event that brine does contact the compacted clay columns, bentonitic clay can generate a  
27   beneficial swelling pressure. Swelling would increase internal supporting pressure on the shaft  
28   wall and accelerate healing of any disturbed rock zone. Wetted, swelling clay will seal fractures  
29   as it expands into available space and will ensure tightness between the clay seal component  
30   and the shaft walls.

31   **A2.2.1    Functions**

32   In general, clay is used to prevent fluid flow either down or up the shaft. In addition, clay will  
33   stabilize the shaft opening and provide a backstress within the Salado Formation that will  
34   enhance healing of microfractures in the disturbed rock. Bentonitic clays are specified for  
35   Components 4, 8, and 12. In addition to limiting brine migration down the shafts, a primary  
36   function of a compacted clay seal through the Rustler Formation (Component 4) is to provide  
37   separation of water bearing units. The primary function of the upper Salado clay column  
38   (Component 8) is to limit groundwater flow down the shaft, thereby adding assurance that the

1 reconsolidating salt column is protected. The lower Salado compacted clay column (Component  
2 12) will act as a barrier to brine and possibly to gas flow (see construction alternatives in  
3 Appendix B) soon after placement and remain a barrier throughout the regulatory period.

#### 4 **A2.2.2 Material Characteristics**

5 The Rustler and Salado compacted clay columns will be constructed of a commercial well-  
6 sealing grade sodium bentonite blocks compacted to between 1.8 and 2.0 g/cm<sup>3</sup>. An extensive  
7 experimental data base exists for the permeability of sodium bentonites under a variety of  
8 conditions. Many other properties of sodium bentonite, such as strength, stiffness, and chemical  
9 stability also have been thoroughly investigated. Advantages of clays for sealing purposes  
10 include low permeability, demonstrated longevity in many types of natural environments,  
11 deformability, sorptive capacity, and demonstrated successful utilization in practice for a variety  
12 of sealing purposes.

13 A variety of clays could be considered for WIPP sealing purposes. For WIPP, as for most if not  
14 all nuclear waste repository projects, bentonite has been and continues to be a prime candidate  
15 as the clay sealing material. Bentonite clay is chosen here because of its overwhelming positive  
16 sealing characteristics. Bentonite is a highly plastic swelling clay material (e.g., Mitchell, 1993),  
17 consisting predominantly of smectite minerals (e.g., IAEA, 1990). Montmorillonite, the  
18 predominant smectite mineral in most bentonites, has the typical plate-like structure  
19 characteristic of most clay minerals.

20 The composition of a typical commercially available sodium bentonite (e.g. Volclay, granular  
21 sodium bentonite) contains over 90% montmorillonite and small portions of feldspar, biotite,  
22 selenite, etc. A typical sodium bentonite has the chemical composition summarized in Table A-8  
23 (American Colloid Company, 1995). This chemical composition is close to that reported for MX-  
24 80 which was used successfully in the Stripa experiments (Gray, 1993). Sodium bentonite has a  
25 tri-layer expanding mineral structure of approximately  $(Al Fe_{1.67} Mg_{0.33}) Si_4O_{10} (OH)_2 Na^+Ca^{++}_{0.33}$ .  
26 Specific gravity of the sodium bentonite is about 2.5. The dry bulk density of granular bentonite  
27 is about 1.04 g/cm<sup>3</sup>.

28 Densely compacted bentonite (of the order of 1.75 g/cm<sup>3</sup>), when confined, can generate a  
29 swelling pressure up to 20 MPa when permeated by water (IAEA, 1990). The magnitude of the  
30 swelling pressure generated depends on the chemistry of the permeating water. Laboratory and  
31 field measurements suggest that the bentonite specified for shaft seal materials in the Salado  
32 may achieve swell pressures of 3 to 4 MPa, and likely substantially less. Swelling pressure in  
33 the bentonite column is not expected to be appreciable because little contact with brine fluids is  
34 conceivable. Further considerations of potential swelling of bentonite within the Rustler  
35 Formation may be appropriate, however.

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**Table A-8  
Representative Bentonite Composition.**

Chemical Compound	Weight %
SiO <sub>2</sub>	63.0
Al <sub>2</sub> O <sub>3</sub>	21.1
Fe <sub>2</sub> O <sub>3</sub>	3.0
FeO	0.4
MgO	2.7
Na <sub>2</sub> O	2.6
CaO	0.7
H <sub>2</sub> O	5.6
Trace Elements	0.7

3 Mixtures of bentonite and water can range in rheological characteristics from a virtually  
4 Newtonian fluid to a stiff solid, depending on water content. Bentonite can form stiff seals at low  
5 moisture content, and can penetrate fractures and cracks when it has a higher water content.  
6 Under the latter conditions it can fill void space in the seal itself and disturbed rock zones.  
7 Bentonite with dry density of 1.75 g/cm<sup>3</sup> has a cohesion of 5-50 kPa, and a friction angle of 5 to  
8 15° (IAEA, 1990). At density greater than 1.6-1.7 g/cm<sup>3</sup>, swelling pressure of bentonite is less  
9 affected by the salinity of groundwater providing better chemical and physical stabilities.

10 **A2.2.3 Construction**

11 Seal performance within the Salado Formation is far more important to regulatory compliance  
12 than is performance of earthen fill in the overlying formations. Three potential construction  
13 methods might be used to place clay in the shaft, as discussed in Appendix B. Construction of  
14 bentonite clay components specifies block assembly procedures demonstrated successfully at  
15 the WIPP site (Knowles and Howard, 1996) and in a considerable body of work by Roland  
16 Pusch (see summary in Gray, 1993). To achieve low permeabilities, dry density of the bentonite  
17 blocks should be about 2.0 g/cm<sup>3</sup>, although a range of densities is discussed in Section 2.2.4. A  
18 high density of clay components is also desirable to carry the weight of overlying seal material  
19 effectively and to minimize subsidence.

20 Placement of clay in the shaft is one area of construction that might be made more cost and  
21 time effective through optimization studies. An option to construct clay columns using dynamic  
22 compaction will likely prove to be efficient, so it is specified for earthen fill in the Dewey Lake  
23 Redbeds (as discussed later) and may prove to be an acceptable placement method for other  
24 components. Dynamic compaction would use equipment developed for placement of crushed  
25 salt. The Canadian nuclear waste program has conducted extensive testing, both in situ and in  
26 large scale laboratory compaction of clay-based barrier materials with dynamic hydraulically  
27 powered impact hammers (e.g., Kjartanson et al, 1992). The Swedish program similarly has  
28 investigated field compaction of bentonite-based tunnel backfill by means of plate vibrators  
29 (e.g., Nilsson, 1985). Both studies demonstrated the feasibility of in situ compaction of  
30 bentonite-based materials to a high density. Near surface, conventional compaction methods



1 will be used because insufficient space remains for dynamic compaction using the multi-deck  
2 work stage.

### 3 **A2.2.4 Performance Requirements**

4 The proven characteristics of bentonite assure attainment of very low permeability seals. It is  
5 recognized that the local environment contributes to the behavior of compacted clay  
6 components. Long-term material stability is a highly desired sealing attribute. Clay components  
7 located in brine environments will have to resist cation exchange and material structure  
8 alteration. Clay is geochemically mature, reducing likelihood of alteration and imbibition of brine  
9 is limited to isolated areas. Compacted clay is designed to withstand possible pressure  
10 gradients and to resist erosion and channeling that could conceivably lead to groundwater flow  
11 through the seal. Compacted clay seal components support the shaft walls and promote healing  
12 of the salt DRZ. Volume expansion or swelling would accelerate healing in the salt. A barrier to  
13 gas flow could be constructed if moisture content of approximately 85% of saturation could be  
14 achieved.

15 Permeability of bentonite is inversely correlated to dry density. Figure G2A-3 plots bentonite  
16 permeability as a function of reported sample density for sodium bentonite samples. The  
17 permeability ranges from approximately  $1 \times 10^{-21}$  to  $1 \times 10^{-17}$  m<sup>2</sup>. In all cases, the data in Figure  
18 G2A-3 are representative of low ionic strength permeant waters. Data provided in this figure are  
19 limited to sodium bentonite and bentonite/sand mixtures with clay content greater than or equal  
20 to 50 %. Cheung et al. (1987) report that in bentonite/sand mixtures, sand acts as an inert  
21 fraction which does not alter the permeability of the mixture from that of a 100 % bentonite  
22 sample at the same equivalent dry density. Also included in Figure G2A-3 are the three point  
23 estimates of permeability at dry densities of 1.4, 1.8, and 2.1 g/cm<sup>3</sup> provided by Jaak Daemen of  
24 the University of Nevada, Reno, who is actively engaged in WIPP-specific bentonite testing.

25 A series of in situ tests (SSSPTs) that evaluated compacted bentonite as a sealing material at  
26 the WIPP site corroborate data shown in Figure G2A-3. Test Series D tested two 100 %  
27 bentonite seals in vertical boreholes within the Salado Formation at the repository horizon. The  
28 diameter of each seal was 0.91 m, and the length of each seal was 0.91 m. Cores of the two  
29 bentonite seals had initial dry densities of 1.8 and 2.0 g/cm<sup>3</sup>. Pressure differentials of 0.72 and  
30 0.32 MPa were maintained across the bentonite seals with a brine reservoir on the upstream  
31 (bottom) of the seals for several years.

32 Over the course of the seal test, no visible brine was observed at the downstream end of the  
33 seals. Upon decommissioning the SSSPT, brine penetration was found to be only 15 cm.  
34 Determination of the absolute permeability of the bentonite seal was not precise; however, a  
35 bounding calculation of  $1 \times 10^{-19}$  m<sup>2</sup> was made by Knowles and Howard (1996).

36 Beginning with a specified dry density of 1.8 to 2.0 g/cm<sup>3</sup> and Figure G2A-3, a distribution  
37 function for clay permeability was developed and is provided in Figure G2A-4. Parameter  
38 distribution reflects some conservative assumptions pertaining to WIPP seal applications. The  
39 following provide rationale behind the distribution presented in Figure G2A-4.

40 1. A practical minimum for the distribution can be specified at  $1 \times 10^{-21}$  m<sup>2</sup>.

- 1           2. If effective dry density of the bentonite emplaced in the seals only varies from 1.8 to  
2           2.0 g/cm<sup>3</sup>, then a maximum expected permeability can be extrapolated from Figure  
3           G2A-3 as 1×10<sup>-19</sup> m<sup>2</sup>.
  
- 4           3. Uncertainty exists in being able to place massive columns of bentonite to design  
5           specifications. To address this uncertainty in a conservative manner, it is assumed that  
6           the compacted clay be placed at a dry density as low as 1.6 g/cm<sup>3</sup>. At 1.6 g/cm<sup>3</sup>, the  
7           maximum permeability for the clay would be approximately 5×10<sup>-19</sup> m<sup>2</sup>. Therefore,  
8           neglecting salinity effects, a range of permeability from 1×10<sup>-21</sup> to 5×10<sup>-19</sup> m<sup>2</sup> with a  
9           best estimate of less than 1×10<sup>-19</sup> m<sup>2</sup> could be reasonably defined (assuming a best  
10          estimate emplacement density of 1.8 g/cm<sup>3</sup>). It could be argued, based on Figure G2A-  
11          3, that a best estimate could be as low as 2×10<sup>-20</sup>m<sup>2</sup>.

12 Salinity increases bentonite permeability; however, these effects are greatly reduced at the  
13 densities specified for the shaft seal. At seawater salinity, Pusch et al. (1989) report the effects  
14 on permeability could be as much as a factor of 5 (one-half order of magnitude). To account for  
15 salinity effects in a conservative manner, the maximum permeability is increased from 5×10<sup>-19</sup>  
16 to 5×10<sup>-18</sup> m<sup>2</sup>. The best estimate permeability is increased by one-half order of magnitude to  
17 5×10<sup>-19</sup> m<sup>2</sup>. The lower limit is held at 1 × 10<sup>-21</sup> m<sup>2</sup>. Because salinity effects are greatest at lower  
18 densities, the maximum is adjusted one full order of magnitude while the best estimate  
19 (assumed to reside at a density of 1.8 g/cm<sup>3</sup>) is adjusted one-half of an order.

20 The four arguments presented above give rise to the permeability cumulative frequency  
21 distribution plotted in Figure G2A-4, which summarizes the performance specification for  
22 bentonite columns.

### 23 **A2.2.5 Verification Methods**

24 Verification of specified properties such as density, moisture content or strength of compacted  
25 clay seals can be determined by direct access during construction. However, indirect methods  
26 are preferred because certain measurements, such as permeability, are likely to be time  
27 consuming and invasive. Methods used to verify the quality of emplaced seals will include  
28 quality of block production and field measurements of density. As a minimum, standard quality  
29 control procedures recommended for compaction operations will be implemented including  
30 visual observation, in situ density measurements, and moisture content measurements. Visual  
31 observation accompanied by detailed record keeping will assure design procedures are being  
32 followed. In situ testing will confirm design objectives are accomplished in the field.

33 Density measurements of compacted clay shall follow standard procedures such as ASTM  
34 D 1556, D 2167, and D 2922. The moisture content of clay blocks shall be calculated based on  
35 the water added during mixing and can be confirmed by following ASTM Standard procedures  
36 D 2216 and D 3017. It is probable that verification procedures will require modifications to be  
37 applicable within the shaft. As a minimum, laboratory testing to certify the above referenced  
38 quality control measures will be performed to assure that the field measurements provide  
39 reliable results.

### 40 **A2.3 Asphalt Components**

41 Asphalt is used to prevent water migration down the shaft in two ways: an asphalt column  
42 bridging the Rustler/Salado contact and a “waterstop” sandwiched between concrete plugs at



1 three locations within the Salado Formation, two above the salt column and one below the salt  
2 column. An asphalt mastic mix (AMM) that contains aggregate is specified for the column while  
3 the specification for the waterstop layer is pure asphalt.

4 Asphalt is a widely used construction material with many desirable properties. Asphalt is a  
5 strong cement, is readily adhesive, highly waterproof, and durable. Furthermore, it is a plastic  
6 substance that provides controlled flexibility to mixtures of mineral aggregates with which it is  
7 usually combined. It is highly resistant to most acids, salts, and alkalis. A number of asphalts  
8 and asphalt mixes are available that cover a wide range of viscoelastic properties which allows  
9 the properties of the mixture to be designed for a wide range of requirements for each  
10 application. These properties are well suited to the requirements of the WIPP shaft seal system.

### 11 **A2.3.1 Functions**

12 The generic purpose of asphalt seal components above the salt column is to eliminate water  
13 migration downward. The asphalt waterstops above the salt column are designed to intersect  
14 the DRZ and limit fluid flow. Asphalt is not the lone component preventing flow of brine  
15 downward; it functions in tandem with concrete and a compacted clay column. Waterstop  
16 Component # 11 located below the salt column would naturally limit upward flow of brine or gas.  
17 Concrete abutting the asphalt waterstops provides a rigid element that creates a backstress  
18 upon the inward creeping salt, promoting healing within the DRZ. Asphalt is included in the  
19 WIPP shaft seal system to reduce uncertainty of system performance by providing redundancy  
20 of function while using an alternative material type. The combination of shaft seal components  
21 restricts fluid flow up or down to allow time for the salt column to reconsolidate and form a  
22 natural fluid-tight seal.

23 The physical and thermal attributes of asphalt combine to reduce fluid flow processes. The  
24 placement fluidity permits asphalt to flow into uneven interstices or fractures along the shaft  
25 wall. Asphalt will self-level into a nearly voidless mass. As it cools, the asphalt will eventually  
26 cease flowing. The elevated temperature and thermal mass of the asphalt will enhance creep  
27 deformation of the salt and promote healing of the DRZ surrounding the shaft. Asphalt adheres  
28 tightly to most materials, eliminating flow along the interface between the seal material and the  
29 surrounding rock.

### 30 **A2.3.2 Material Characteristics**

31 The asphalt column specified for the WIPP seal system is an AMM commonly used for hydraulic  
32 structures. The AMM is a mixture of asphalt, sand, and hydrated lime. The asphalt content of  
33 AMM is higher than those used in typical hot mix asphalt concrete (pavements). High asphalt  
34 contents (10-20% by weight) and fine, well-graded aggregate (sand and mineral fillers) are used  
35 to obtain a near voidless mix. A low void content ensures a material with extremely low water  
36 permeability because there are a minimum number of connected pathways for brine migration.

37 A number of different asphaltic construction materials, including hot mix asphalt concrete  
38 (HMAC), neat asphalt, and AMMs, were evaluated for use in the WIPP seal design. HMAC was  
39 eliminated because of construction difficulty that might have led to questionable performance.  
40 An AMM is selected as a preferred alternative for the asphalt columns because it has economic  
41 and performance advantages over the other asphaltic options. Aggregate and mineral fines in  
42 the AMM increase rigidity and strength of the asphalt seal component, thereby enhancing the  
43 potential to heal the DRZ and reducing shrinkage relative to neat asphalt.

1 Viscosity of the AMM is an important physical property affecting construction and performance.  
2 The AMM is designed to have low enough viscosity to be pumpable at application temperatures  
3 and able to flow readily into voids. High viscosity of the AMM at operating temperatures  
4 prevents long-term flow, although none is expected. Hydrated lime is included in the mix design  
5 to increase the stability of the material, decrease moisture susceptibility, and act as an anti-  
6 microbial agent. Table A-9 details the mix design specifications for the AMM.

7 The asphalt used in the waterstop is AR-4000, a graded asphalt of intermediate viscosity. The  
8 waterstop uses pure, or neat, asphalt because it is a relatively small volume when compared to  
9 the column.

### 10 **A2.3.3 Construction**

11 Construction of asphalt seal components can be accomplished using a slickline process where  
12 the molten material is effectively pumped into the shaft. The AMM will be mixed at ground level  
13 in a pug mill at approximately 180°C. At this temperature the material is readily pourable. The  
14 AMM will be slicklined and placed using a heated and insulated tremie line. The AMM will easily  
15 flow into irregularities in the surface of the shaft or open fractures until the AMM cools. After  
16 cooling, flow into surface irregularities in the shaft and DRZ will slow considerably because of  
17 the sand and mineral filler components in the AMM and the temperature dependence of the  
18 viscosity of the asphalt. AMM requires no compaction in construction. Neat asphalt will be  
19 placed in a similar fashion.

20 The technology to pump AMM is available as described in the construction procedures in  
21 Appendix B. One potential problem with this method of construction is ensuring that the slickline  
22 remains heated throughout the construction phase. Impedance heating (a current construction  
23 technique) can be used to ensure the pipe remains at temperatures sufficient to promote flow.  
24 The lower section (say 10 m) of the pipe may not need to be heated, and it may not be desirable  
25 to heat it as it is routinely immersed in the molten asphalt during construction to minimize air  
26 entrainment. Construction using large volumes of hot asphalt would be facilitated by placement  
27 in sections. After several meters of asphalt are placed, the slickline would be retracted by two  
28 lengths of pipe and pumping resumed. Once installed, the asphalt components will cool; the  
29 column will require several months to approach ambient conditions. Calculations of cooling  
30 times and plots of isotherms for the asphalt column are given in Appendix D of the Compliance  
31 Submittal Design Report (Sandia, 1996). It should be noted that a thermal pulse into the  
32 surrounding rock salt could produce positive rock mechanics conditions. Fractures will heal  
33 much faster owing to thermally activated dislocation motion and diffusion. Salt itself will creep  
34 inward at a much greater rate as well.

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**Table A-9  
Asphalt Component Specifications**

AMM Composition:	20 wt% asphalt (AR-4000 graded asphalt) 70 wt% aggregate (silicate sand) 10 wt% hydrated lime	
Aggregate (% passing by weight)		
US Sieve Size		Specification Limits
2.36 mm	(No. 8)	100
1.18 mm	(No. 16)	90
600	(No. 30)	55-75
300	(No. 50)	35-50
150	(No. 100)	15-30
75	(No. 200)	5-15
Mineral Filler: Hydrated Lime Chemical Composition:		
Total active lime content (% by weight).....		min. 90.0%
Unhydrated lime weight (% by weight CaO).....		max. 5.0%
Free water (% by weight H <sub>2</sub> O).....		max. 4.0%
Residue Analysis:		
Residue retained on No. 6 sieve .....		max. 0.1%
Residue retained on No. 30 sieve .....		max. 3.0%

3 **A2.3.4 Performance Requirements**

4 Asphalt components are required to endure for about 100 years as an interim seal while the  
5 compacted salt component reconsolidates to create a very low permeability seal component.  
6 Since asphalt will not be subjected to ultraviolet light or an oxidizing environment, it is expected  
7 to provide an effective brine seal for several centuries. Air voids should be less than 2% to  
8 ensure low permeability. Asphalt mixtures do not become measurably permeable to water until  
9 voids approach 8% (Brown, 1990).

10 At Hanford, experiments are ongoing on the development of a passive surface barrier designed  
11 to isolate wastes (in this case to prevent downward flux of water and upward flux of gases) for  
12 1000 years with no maintenance. The surface barrier uses asphalt as one of many horizontal  
13 components because low-air-void, high-asphalt-content materials are noted for low permeability  
14 and improved mechanically stable compositions. The design objective of this asphalt concrete  
15 was to limit infiltration to  $1.6 \times 10^{-9}$  cm/s ( $1.6 \times 10^{-11}$  m/s, or for fresh water, an intrinsic  
16 permeability of  $1.6 \times 10^{-18}$  m<sup>2</sup>). The asphalt component of the barrier is composed of a 15 cm  
17 layer of asphaltic concrete overlain with a 5-mm layer of fluid-applied asphalt. The reported  
18 hydraulic conductivity of the asphalt concrete is estimated to be  $1 \times 10^{-9}$  m/s (equivalent to an  
19 intrinsic permeability of approximately  $1 \times 10^{-16}$  m<sup>2</sup> assuming fresh water). Myers and Duranceau  
20 (1994) report that the hydraulic conductivity of fluid-applied asphalt is estimated to be  $1.0 \times 10^{-11}$   
21 to  $1.0 \times 10^{-10}$  cm/s (equivalent to an intrinsic permeability of approximately  $1.0 \times 10^{-20}$  to  $1.0 \times 10^{-19}$   
22 m<sup>2</sup> assuming fresh water).

1 Consideration of published values results in a lowest practical permeability of  $1 \times 10^{-21}$  m<sup>2</sup>. The  
2 upper limit of the asphalt seal permeability is assumed to be  $1 \times 10^{-18}$  m<sup>2</sup>. Intrinsic permeability of  
3 the asphalt column is defined as a log triangular distributed parameter, with a best estimate  
4 value of  $1 \times 10^{-20}$  m<sup>2</sup>, a minimum value of  $1 \times 10^{-21}$  m<sup>2</sup>, and a maximum value of  $1 \times 10^{-18}$  m<sup>2</sup>, as  
5 shown in Figure G2A-5. It is recognized that the halite DRZ in the uppermost portion of the  
6 Salado Formation is not likely to heal because creep of salt is relatively slow.

7 These values are used in performance assessment of regulatory compliance analyses and in  
8 fluid flow calculations (Appendix C of the Compliance Submittal Design Report (Sandia, 1996))  
9 pertaining to seal system functional evaluation. Other calculations pertaining to rock mechanics  
10 and structural considerations of asphalt elements are discussed in Appendix D of the  
11 Compliance Submittal Design Report (Sandia, 1996).

### 12 **A2.3.5 Verification Methods**

13 Viscosity of the AMM must be low enough for easy delivery through a heated slickline. Sufficient  
14 text book information is available to assure performance of the asphalt component; however,  
15 laboratory validation tests may be desirable before installation. There are no plans to test  
16 asphalt components after they are placed. With that in mind, some general tests identified below  
17 would add quantitative documentation to expected performance values and have direct  
18 application to WIPP. The types and objectives of the verification tests are:

19 *Mix Design.* A standard mix design which evaluates a combination of asphalt and aggregate  
20 mixtures would quantify density, air voids, viscosity, and permeability. Although the specified  
21 mixture will function adequately, studies could optimize the mix design.

22 *Viscoelastic Properties at Service Temperatures.* Viscoelastic properties over the range of  
23 expected service temperatures would refine the rheological model.

24 *Accelerated Aging Analysis.* Asphalt longevity issues could be further addressed by using the  
25 approach detailed in PNL-Report 9336 (Freeman and Romine, 1994).

26 *Brine Susceptibility Analysis.* The presumed inert nature of the asphalt mix can be  
27 demonstrated through exposure to groundwater brine solutions found in the Salado Formation.  
28 Potential for degradation will be characterized by monitoring the presence of asphalt  
29 degradation products in WIPP brine or brine simulant as a function of time. Effects on hydraulic  
30 conductivity can be measured during these experiments.

### 31 **A2.4 Compacted Salt Column**

32 A reconstituted salt column has been proposed as a primary means to isolate for several  
33 decades those repositories containing hazardous materials situated in evaporite sequences.  
34 Reuse of salt excavated in the process of creating the underground openings has been  
35 advocated since the initial proposal by the NAS in the 1950s. Replacing the natural material to  
36 its original setting ensures physical, chemical, and mechanical compatibility with the host  
37 formation. Recent developments in support of the WIPP shaft seal system have produced  
38 confirming experimental results, constitutive material laws, and construction methods that  
39 substantiate use of a salt column for a low permeability, perfectly compatible seal component.

1 Numerical models of the shaft and seal system have been used to provide information on the  
2 mechanical processes that affect potential pathways and overall performance of the seal  
3 system. Several of these types of analyses are developed in Appendix D of the Compliance  
4 Submittal Design Report (Sandia, 1996). Simulations of the excavated shaft and the compacted  
5 salt seal element behavior after placement show that as time passes, the host salt creeps  
6 inward, the compacted salt is loaded by the host formation and consolidates, and a back  
7 pressure is developed along the shaft wall. The back pressure imparted to the host formation by  
8 the compacted salt promotes healing of any microcracks in the host rock. As compacted salt  
9 consolidates, density and stiffness increase and permeability decreases.

#### 10 **A2.4.1 Functions**

11 The function of the compacted and reconsolidated salt column is to limit transmission of fluids  
12 into or out of the repository for the statutory period of 10,000 years. The functional period starts  
13 within a hundred years and lasts essentially forever. After a period of consolidation, the salt  
14 column will almost completely retard gas or brine migration within the former shaft opening. A  
15 completely consolidated salt column will achieve flow properties indistinguishable from natural  
16 Salado salt.

#### 17 **A2.4.2 Material Characteristics**

18 The salt component comprises crushed Salado salt with addition of small amounts of water. No  
19 admixtures other than water are needed to meet design specifications. Natural Salado salt (also  
20 called WIPP salt) is typical of most salts in the Permian Basin: it has an overall composition  
21 approaching 90-95 % halite with minor clays, carbonate, anhydrite, and other halite minerals.  
22 Secondary minerals and other impurities are of little consequence to construction or  
23 performance of the compacted salt column as long as the halite content is approximately 90 %.

24 The total water content of the crushed salt should be approximately 1.5 wt% as it is tamped into  
25 place. Field and laboratory testing verified that natural salt can be compacted to significant  
26 density ( $\rho \geq 0.9$ ) with addition of these modest amounts of water. In situ WIPP salt contains  
27 approximately 0.5 wt% water. After it is mined, transported, and stored, some of the connate  
28 water is lost to evaporation and dehydration. Water content of the bulk material that would be  
29 used for compaction in the shaft is normally quite small, on the order of 0.25 wt%, as measured  
30 during compaction demonstrations (Hansen and Ahrens, 1996). Measurements of water content  
31 of the salt will be necessary periodically during construction to calibrate the proper amount of  
32 water to be added to the salt as it is placed.

33 Water added to the salt will be sprayed in a fine mist onto the crushed salt as it is cast in each  
34 lift. Methods similar to those used in the large-scale compaction demonstration will be  
35 developed such that the spray visibly wets the salt grain surfaces. General uniformity of spray is  
36 desired. The water has no special chemical requirements for purity. It can be of high quality  
37 (drinkable) but need not be potable. Brackish water would suffice because water of any quality  
38 would become brackish upon application to the salt.

39 The mined salt will be crushed and screened to a nominal maximum diameter of 5 mm.  
40 Gradation of particles smaller than 5 mm is not of concern because the crushing process will  
41 create relatively few fines compared to the act of dynamic compaction. Based on preliminary  
42 large-scale demonstrations, excellent compaction was achieved without optimization of particle  
43 sizes. It is evident from results of the large compaction demonstration coupled with laboratory

1 studies that initial density can be increased and permeability decreased beyond existing  
2 favorable results. Further demonstrations of techniques, including crushing and addition of  
3 water may be undertaken in ensuing years between compliance certification and beginning of  
4 seal placement.

### 5 **A2.4.3 Construction**

6 Dynamic compaction is the specified procedure to tamp crushed salt in the shaft. Other  
7 techniques of compaction have potential, but their application has not been demonstrated. Deep  
8 dynamic compaction provides the greatest energy input to the crushed salt, is easy to apply,  
9 and has an effective depth of compactive influence far greater than lift thickness. Dynamic  
10 compaction is relatively straightforward and requires a minimal work force. If the number of  
11 drops remains constant, diameter and weight of the tamper increases in proportion to the  
12 diameter of the shaft. The weight of the tamper is a factor in design of the infrastructure  
13 supporting the hoisting apparatus. Larger, heavier tampers require equally stout staging. The  
14 construction method outlined in Appendix B balances these opposing criteria. Compaction itself  
15 will follow the successful procedure developed in the large-scale compaction demonstration  
16 (Hansen and Ahrens, 1996).

17 Transport of crushed salt to the working level can be accomplished by dropping it down a  
18 slickline. As noted, additional water will be sprayed onto the crushed salt at the bottom of the  
19 shaft as it is placed. Lift heights of approximately 2 m are specified, though greater depths could  
20 be compacted effectively using dynamic compaction. Uneven piles of salt can be hand leveled.

### 21 **A2.4.4 Performance Requirements**

22 Compacted crushed salt is a unique seal material because it consolidates naturally as the host  
23 formation creeps inward. As the crushed salt consolidates, void space diminishes, density  
24 increases, and permeability decreases. Thus, sealing effectiveness of the compacted salt  
25 column will improve with time. Laboratory testing over the last decade has shown that  
26 pulverized salt specimens can be compressed to high densities and low permeabilities (Brodsky  
27 et al., 1996). In addition, consolidated crushed salt uniquely guarantees chemical and  
28 mechanical compatibility with the host salt formation. Therefore, crushed salt will provide a seal  
29 that will function essentially forever once the consolidation process is completed. Primary  
30 performance results of these analyses include plots of fractional density as a function of depth  
31 and time for the crushed salt column and permeability distribution functions that will be used for  
32 performance assessment calculations. These performance results are summarized near the end  
33 of this section, following a limited background discussion.

34 To predict performance, a constitutive model for crushed salt is required. To this end, a  
35 technical evaluation of potential crushed salt constitutive models was completed (Callahan et  
36 al., 1996). Ten potential crushed salt constitutive models were identified in a literature search to  
37 describe the phenomenological and micromechanical processes governing consolidation of  
38 crushed salt. Three of the ten potential models were selected for rigorous comparisons to a  
39 specially developed, although somewhat limited, database. The database contained data from  
40 hydrostatic and shear consolidation laboratory experiments. The experiments provide  
41 deformation (strain) data as a function of time under constant stress conditions. Based on  
42 volumetric strain measurements from experiments, change in crushed salt density and porosity  
43 are known. In some experiments, permeability was also measured, which provides a  
44 relationship between density and permeability of crushed salt. Models were fit to the



1 experimental database to determine material parameter values and the model that best  
2 represents experimental data.

3 Modeling has been used to predict consolidating salt density as a function of time and position  
4 in the shaft. Position or depth of the calculation is important because creep rates of intact salt  
5 and crushed salt are strong functions of stress difference. Analyses made use of a “pineapple”  
6 slice structural model at the top (430 m), middle (515 m), and bottom (600 m) of the compacted  
7 salt column. Initial fractional density of the compacted crushed salt was 0.90 (1944 kg m<sup>-3</sup>). The  
8 structural model, constitutive material models, boundary conditions, etc. are described in  
9 Appendix D of the Compliance Submittal Design Report (Sandia, 1996). Modeling results  
10 coupled with laboratory-determined relationships between density and permeability were used  
11 to develop distribution functions for permeability of the compacted crushed salt column for  
12 centuries after seal emplacement.

13 Analyses used reference engineering values for parameters in the constitutive models (e.g., the  
14 creep model for intact salt and consolidation models for crushed salt). Some uncertainty  
15 associated with model parameters exists in these constitutive models. Consolidating salt density  
16 was quantified by predicting density at specific times using parameter variations. Many of these  
17 types of calculations comparing three models for consolidation of crushed salt were performed  
18 to quantify performance of the salt column, and the reader is referred to Appendix D of the  
19 Compliance Submittal Design Report (Sandia, 1996) for more detail.

20 Predictions of fractional density as a function of time and depth are shown in Figure G2A-6.  
21 Performance calculations of the seal system require quantification of the resultant salt  
22 permeability. The permeability can be derived from the experimental data presented in Figure  
23 G2A-7. This plot depicts probabilistic lines through the experimental data. From these lines,  
24 distribution functions can be derived. Permeability of the compacted salt column is treated as a  
25 transient random variable defined by a log triangular distribution. Distribution functions were  
26 provided for 0, 50, 100, 200, and 400 years after seal emplacement, assuming that fluids in the  
27 salt column pores spaces would not produce a backstress. The resultant cumulative frequency  
28 distribution for seal permeability at the seal mid-height is shown in Figure G2A-8. This method  
29 predicts permeabilities ranging from  $1 \times 10^{-23}$  m<sup>2</sup> to  $1 \times 10^{-16}$  m<sup>2</sup>. Because crushed salt  
30 consolidation will be affected by both mechanical and hydrological processes, detailed  
31 calculations were performed. These calculations are presented in Appendices C and D.

32 Numerical models of the shaft provide density of the compacted salt column as a function of  
33 depth and time. From the density-permeability relationship, permeability of the compacted salt  
34 seal component can be calculated. Similarly, the extent of the disturbed rock zone around the  
35 shaft is provided by numerical models. From field measurements of the halite DRZ, permeability  
36 of the DRZ is known as a function of depth and time. These spatial and temporal permeability  
37 values provide information required to assess the potential for brine and gas movement in and  
38 around the consolidating salt column.

#### 39 **A2.4.5 Verification Methods**

40 Results of the large-scale dynamic compaction demonstration suggest that deep dynamic  
41 compaction will produce a dense starting material, and laboratory work and modeling show that  
42 compacted salt will reconsolidate within several decades to an essentially impermeable mass.  
43 As with other seal components, testing of the material in situ will be difficult and probably not the  
44 best way to ensure quality of the seal element. This is particularly apparent for the compacted

1 salt component because the compactive effort produces a finely powdered layer on the top of  
2 each lift. It turns out that the fine powder compacts into a very dense material when the next lift  
3 is compacted. The best way to ensure that the crushed salt element functions properly is to  
4 establish performance through QA/QC procedures. If crushed salt is placed with a reasonable  
5 uniformity of water and is compacted with sufficient energy, long-term performance can be  
6 assured.

7 Periodic measurements of the water content of loose salt as it is placed in lifts will be used for  
8 verification and quality control. Thickness of lifts will be controlled. Energy imparted to each lift  
9 will be documented by logging drop patterns and drop height. If deemed necessary, visual  
10 inspection of the tamped salt can be made by human access. The powder layer can be  
11 shoveled aside and hardness of underlying material can be qualitatively determined or tested.  
12 Overall geometric measurements made from the original surface of each lift could be used to  
13 approximate compacted density.

## 14 **A2.5 Cementitious Grout**

15 Cementitious grouting is specified for all concrete members in response to external review  
16 suggestions. Grouting is also used in advance of liner removal to stabilize the ground.  
17 Cementitious grout is specified because of its proven performance, nontoxicity, and previous  
18 use at the WIPP.

### 19 **A2.5.1 Functions**

20 The function of grout is to stabilize the surrounding rock before existing concrete liners are  
21 removed. Grout will fill fractures within adjacent lithologies, thereby adding strength and  
22 reducing permeability. Grout around concrete members of the concrete asphalt waterstop will  
23 be employed in an attempt to tighten the interface and fill microcracks in the DRZ. Efficacy of  
24 grouting will be determined during construction. In addition, reduction of local permeability will  
25 further limit groundwater influx into the shaft during construction. Concrete plugs are planned for  
26 specific elevations in the lined portion of each shaft. The formation behind the concrete liner will  
27 be grouted from approximately 3 m below to 3 m above the plug positions to ensure stability of  
28 any loose rock.

### 29 **A2.5.2 Material Characteristics**

30 The grout developed for use in the shaft seal system has the following characteristics:

- 31 • no water separation upon hydration,
- 32 • low permeability paste,
- 33 • fine particle size,
- 34 • low hydrational heat,
- 35 • no measurable agglomeration subsequent to mixing,
- 36 • two hours of injectability subsequent to mixing,
- 37 • short set time,
- 38 • high compressive strength, and
- 39 • competitive cost.



1 A cementitious grout developed by Ahrens and coworkers (Ahrens et al., 1996) is specified for  
2 application in the shaft seal design. This grout consists of portland cement, pumice as a  
3 pozzolanic material, and superplasticizer in the proportions listed in Table A-10. The ultrafine  
4 grout is mixed in a colloidal grout mixer, with a water to components ratio (W:C) of 0.6:1. Grout  
5 has been produced with 90 % of the particles smaller than 5 microns and an average particle  
6 size of 2 microns. The extremely small particle size enables the grout to penetrate fractures with  
7 apertures as small as 6 microns.

8 **Table A-10**  
9 **Ultrafine Grout Mix Specification**

Component	Weight Percent (wt%)
Type 5 portland cement	45
Pumice	55
Superplasticizer	1.5

### 10 **A2.5.3 Construction**

11 Grout holes will be drilled in a spin pattern that extends from 3 m below to 3 m above that  
12 portion of the lining to be removed. The drilling and grouting sequence will be defined in the  
13 workmanship specifications prior to construction. Grout will be mixed on surface and transferred  
14 to the work deck via the slick line. Maximum injection pressure will be lithostatic, less 50 psig. It  
15 is estimated that four holes can be drilled and grouted per shift.

### 16 **A2.5.4 Performance Requirements**

17 Performance of grout is not a consideration for compliance issues. Grouting is used to facilitate  
18 construction by stabilizing any loose rock behind the concrete liner. If the country rock is  
19 fractured, grouting will reduce the permeability of the DRZ significantly. Application at the WIPP  
20 demonstrated permeability reduction in an anhydrite marker bed of two to three orders of  
21 magnitude (Ahrens et al., 1996). Reduction of local permeability adds to longevity of the grout  
22 itself and reduces the possibility of brine contacting seal elements. Because grout does not  
23 influence compliance issues, a model for it is not used and has not been developed. General  
24 performance achievements are:

- 25 • filled fractures as small as 6 microns,
- 26 • no water separation upon hydration,
- 27 • no evidence of halite dissolution,
- 28 • no measurable agglomeration subsequent to mixing,
- 29 • one hour of injectability,
- 30 • initial Vicat needle set in 2.5 hours,
- 31 • compressive strength 40 MPa at 28 days, and
- 32 • competitive cost.

### 33 **A2.5.5 Verification Methods**

34 No verification of the effectiveness of grouting is currently specified. If injection around concrete  
35 plugs is possible, an evaluation of quantities and significance of grouting will be made during

1 construction. Procedural specifications will include measurements of fineness and determination  
2 of rheology in keeping with processes established during the WIPP demonstration grouting  
3 (Ahrens et al., 1996).

#### 4 **A2.6 Earthen Fill**

5 Compacted earthen fill comprise approximately 150 m of shaft fill in the Dewey Lake Redbeds  
6 and near surface stratigraphy.

##### 7 **A2.6.1 Functions**

8 There are minimal performance requirements imposed for Components 1 and 3 and none that  
9 affect regulatory compliance of the site. Specifications for Components 1 and 3 are general: fill  
10 the shaft with relatively dense material to reduce subsidence.

##### 11 **A2.6.2 Material Characteristics**

12 Fill can utilize material that was excavated during shaft sinking and stored at the WIPP site, or a  
13 borrow pit may be excavated to secure fill material. The bulk fill material may include bentonite  
14 additive, if deemed appropriate.

##### 15 **A2.6.3 Construction**

16 Dynamic compaction is specified for the clay column in the Dewey Lake Formation because of  
17 its perceived expediency. Vibratory compaction will be used near surface when there is no  
18 longer space for the three stage construction deck.

##### 19 **A2.6.4 Performance Requirements**

20 Care will be taken to compact the earthen fill with an energy of twice Modified Proctor energy,  
21 which has been shown to produce a dense, uniform fill.

##### 22 **A2.6.6 Verification**

23 Materials placed will be documented, with density measurements as appropriate.

#### 24 **A3. CONCLUDING REMARKS**

25 Material specifications in this appendix provide descriptions of seal materials along with  
26 reasoning about why they are expected to function well in the WIPP setting. The specification  
27 follows a framework that states the function of the seal component, a description of the material,  
28 and a summary of construction techniques that could be implemented without resorting to  
29 extensive development efforts. Discussion of performance requirements for each material is the  
30 most detailed section because design of the seal system requires analysis of performance to  
31 ascertain compliance with regulations. Successful design of the shaft seal system is  
32 demonstrated by an evaluation of how well the design performs, rather than by comparison with  
33 a predetermined quantity.

34 Materials chosen for use in the shaft seal system have several common desirable attributes: low  
35 permeability, availability, high density, longevity, low cost, constructability, and supporting

1 documentation. Functional redundancy using different materials provides an economically and  
2 technologically feasible shaft seal system that limits fluid transport.

3

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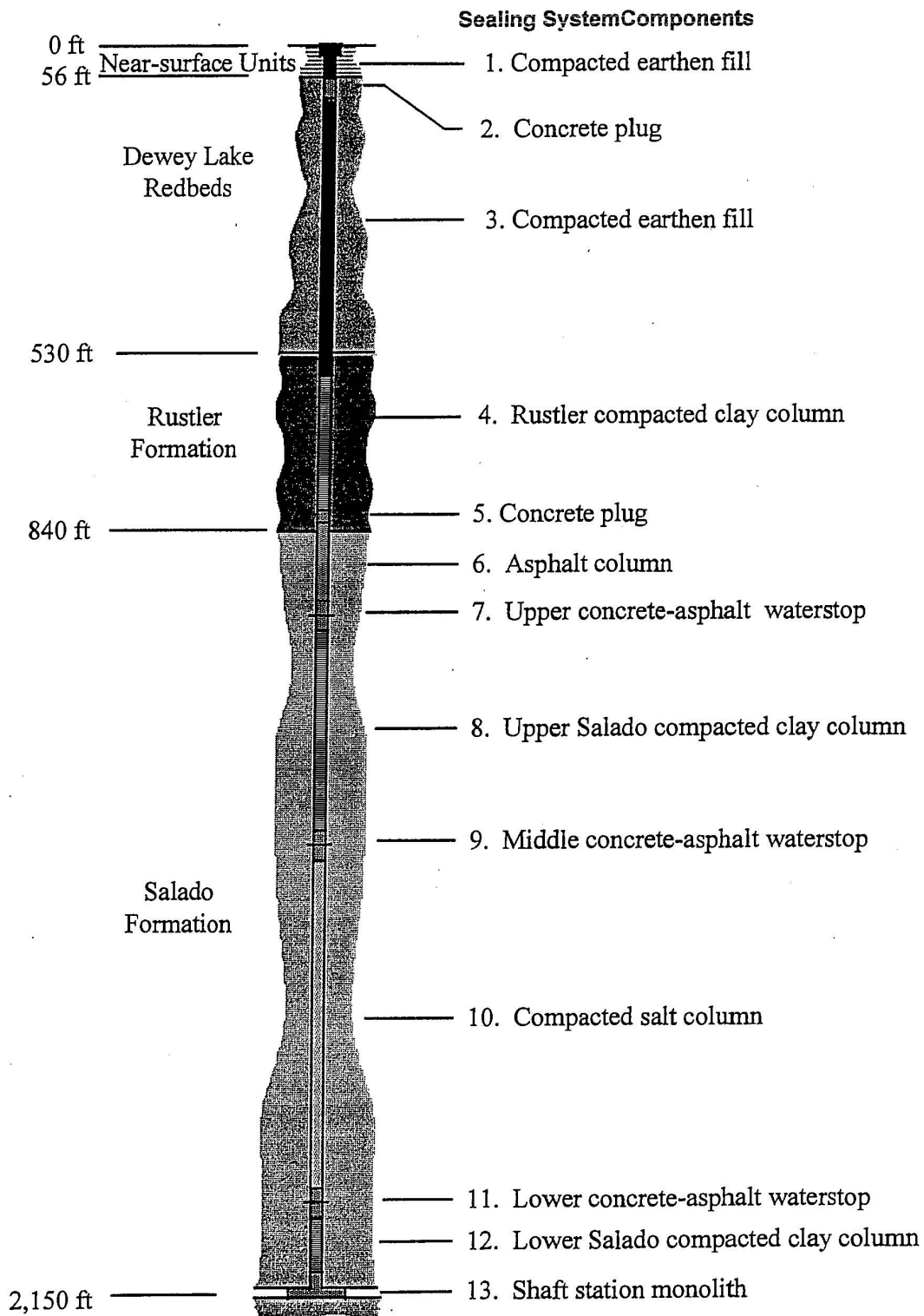


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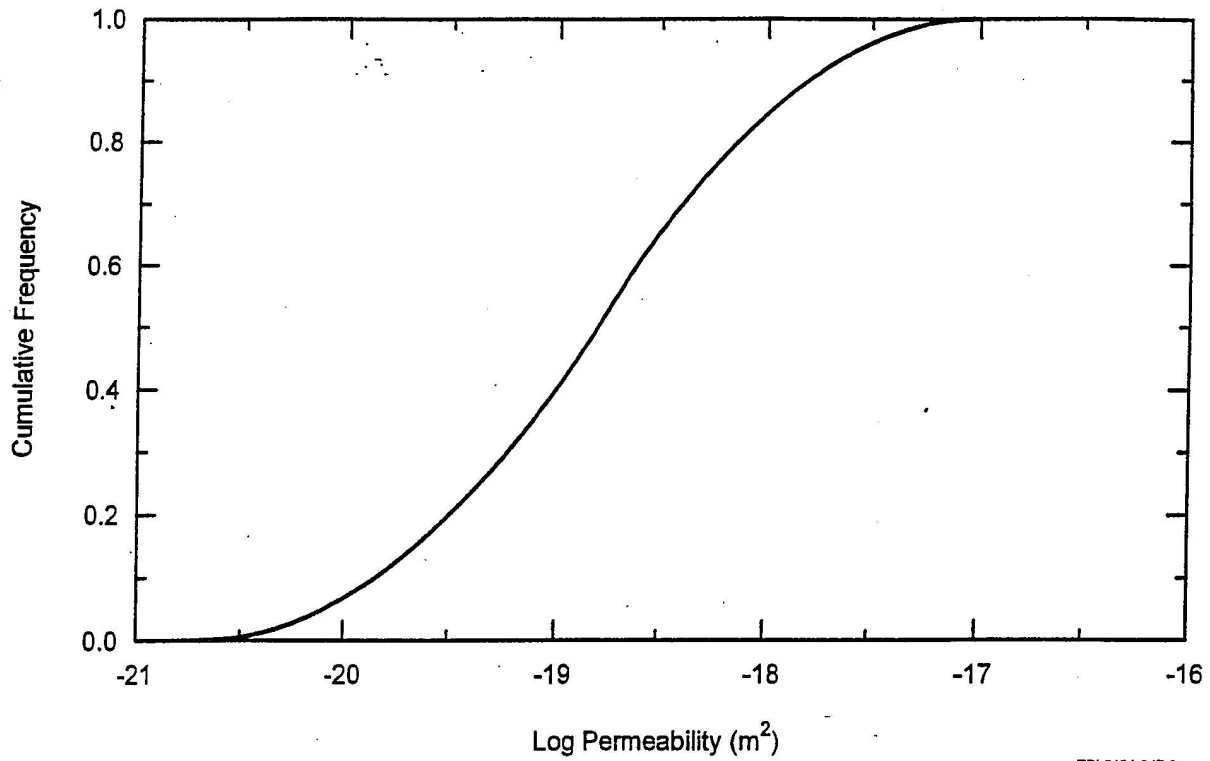
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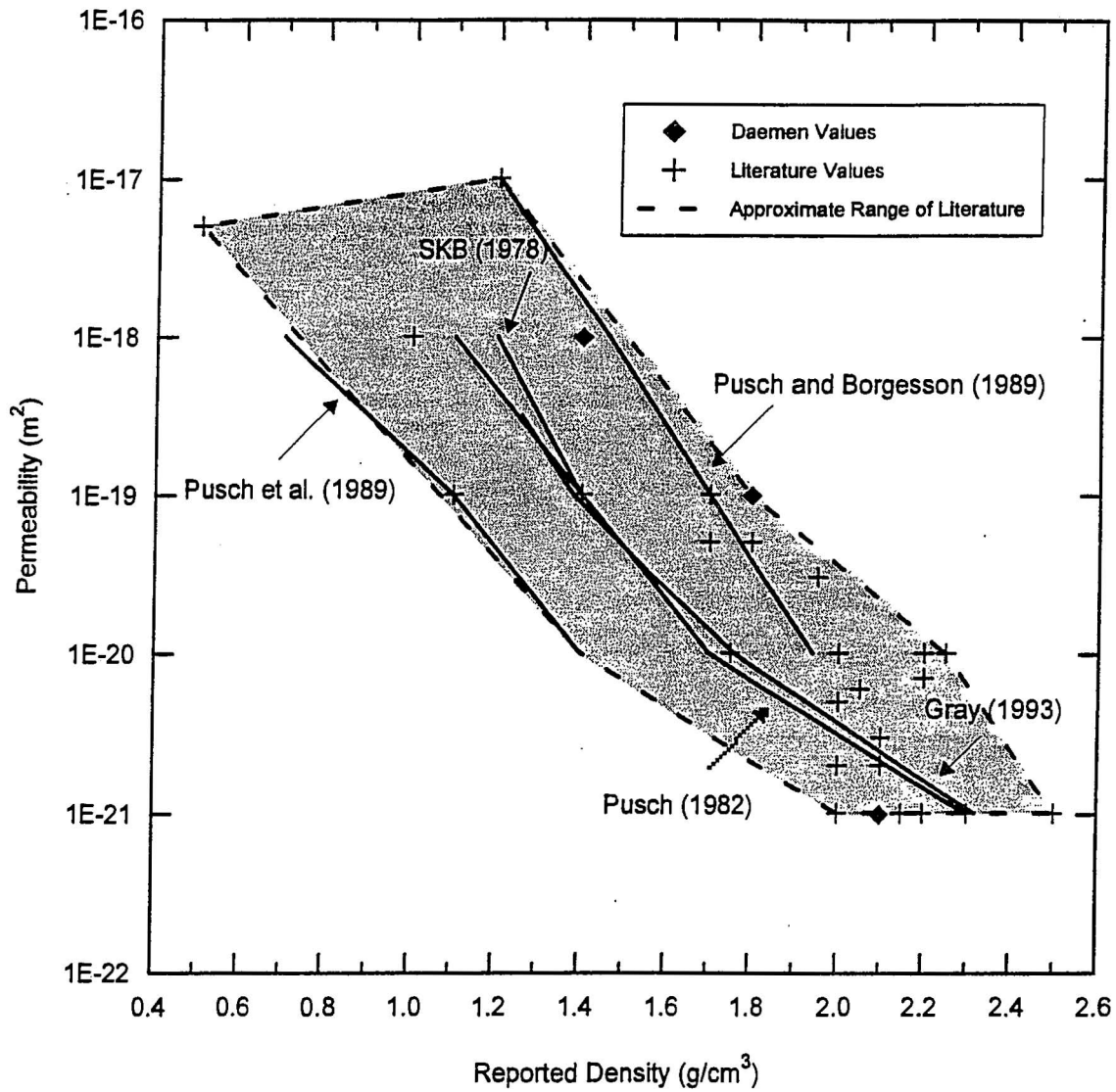


**Figure G2A-1**  
**Schematic of the WIPP Shaft Seal Design**



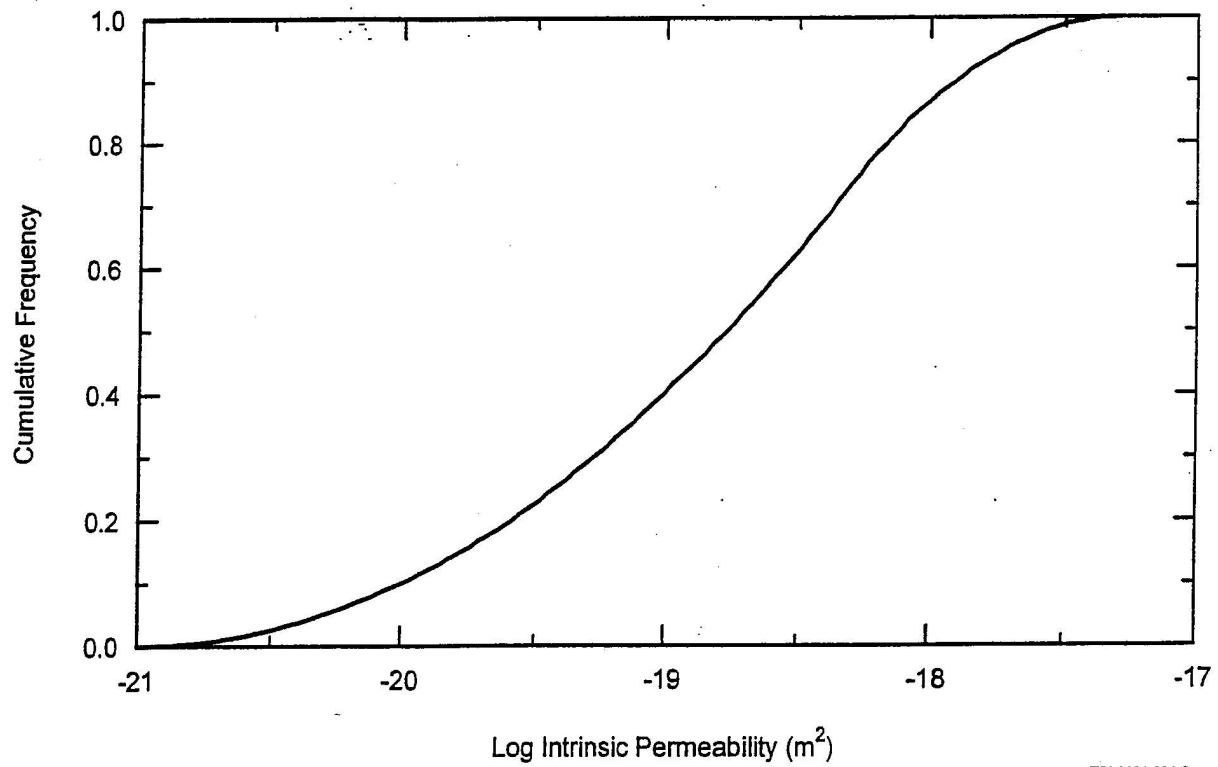
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**Figure G2A-2**  
**Cumulative Distribution Function for SMC**

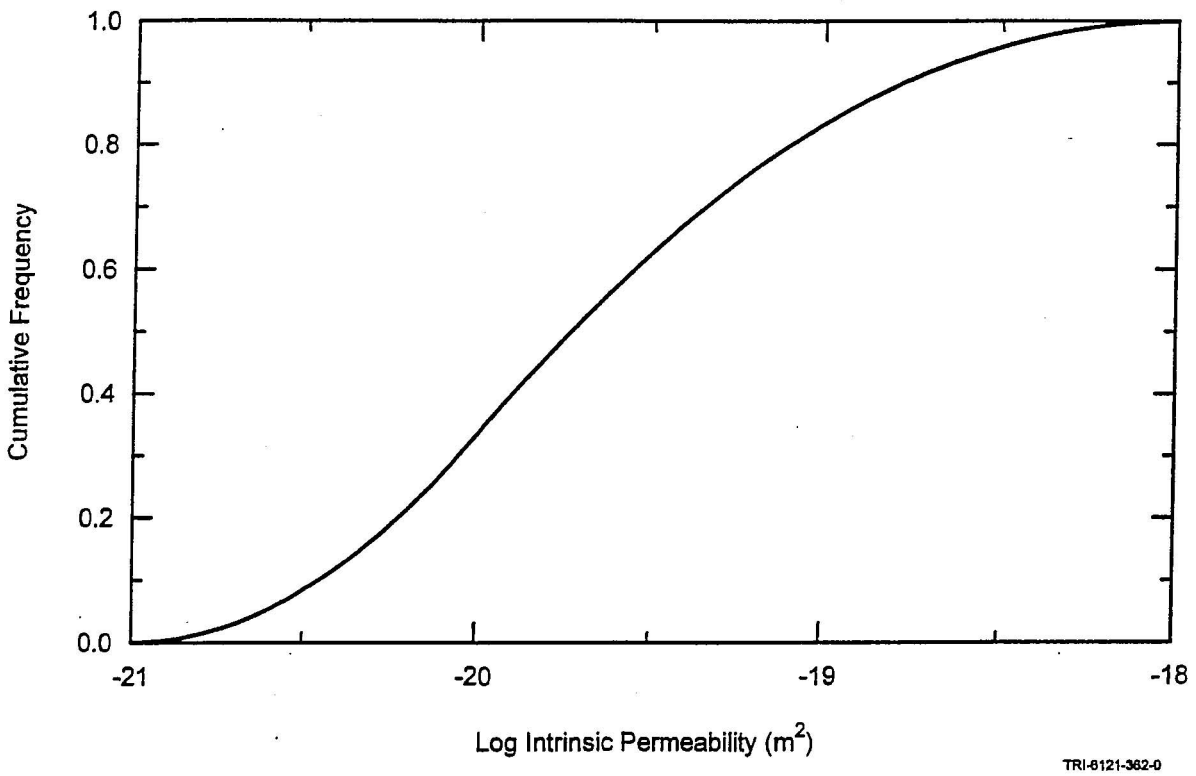


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Figure G2A-3  
Sodium Bentonite Permeability Versus Density



**Figure G2A-4**  
**Cumulative Frequency Distribution for Compacted Bentonite**



**Figure G2A-5**  
**Asphalt Permeability Cumulative Frequency Distribution Function**



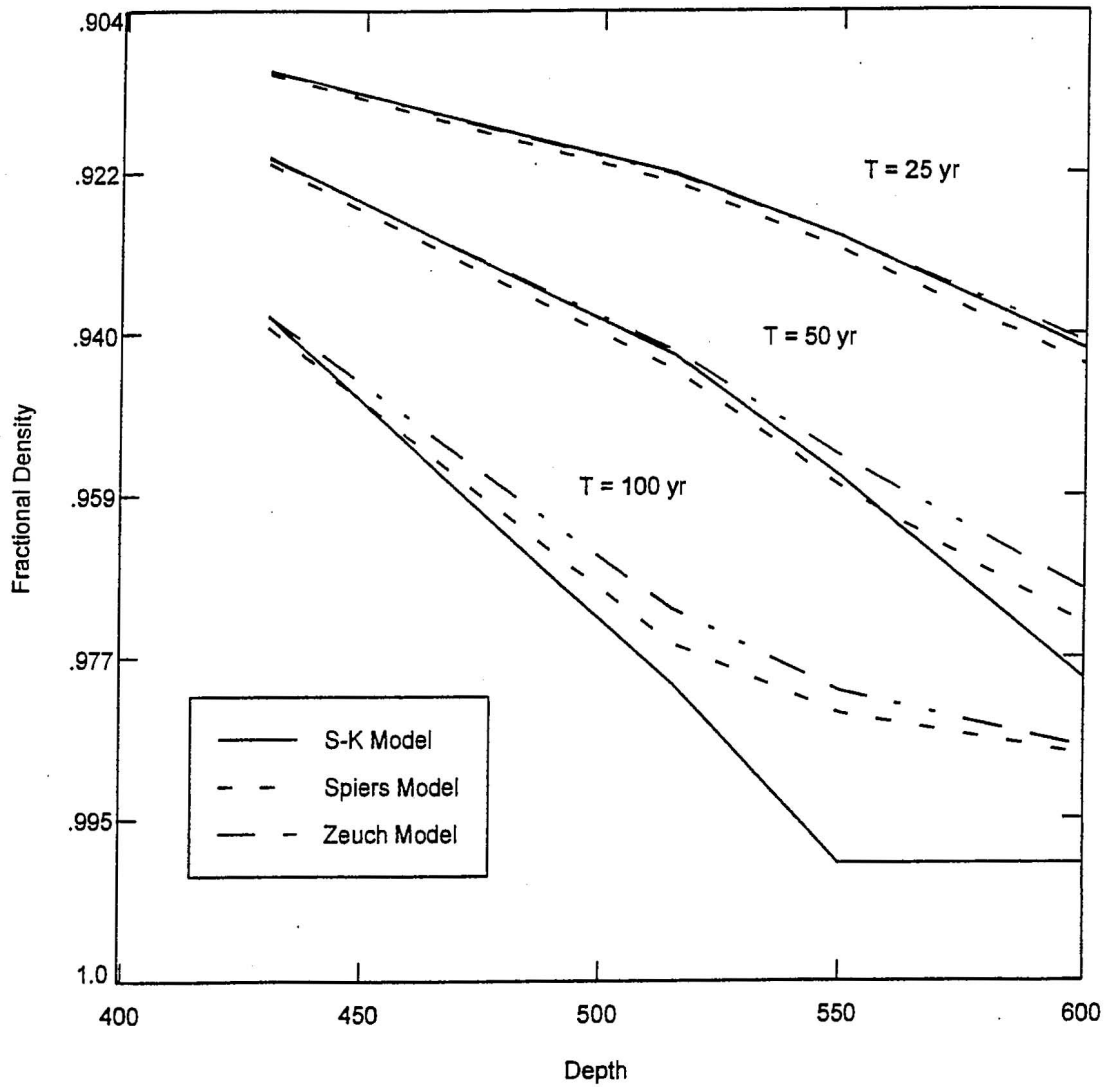
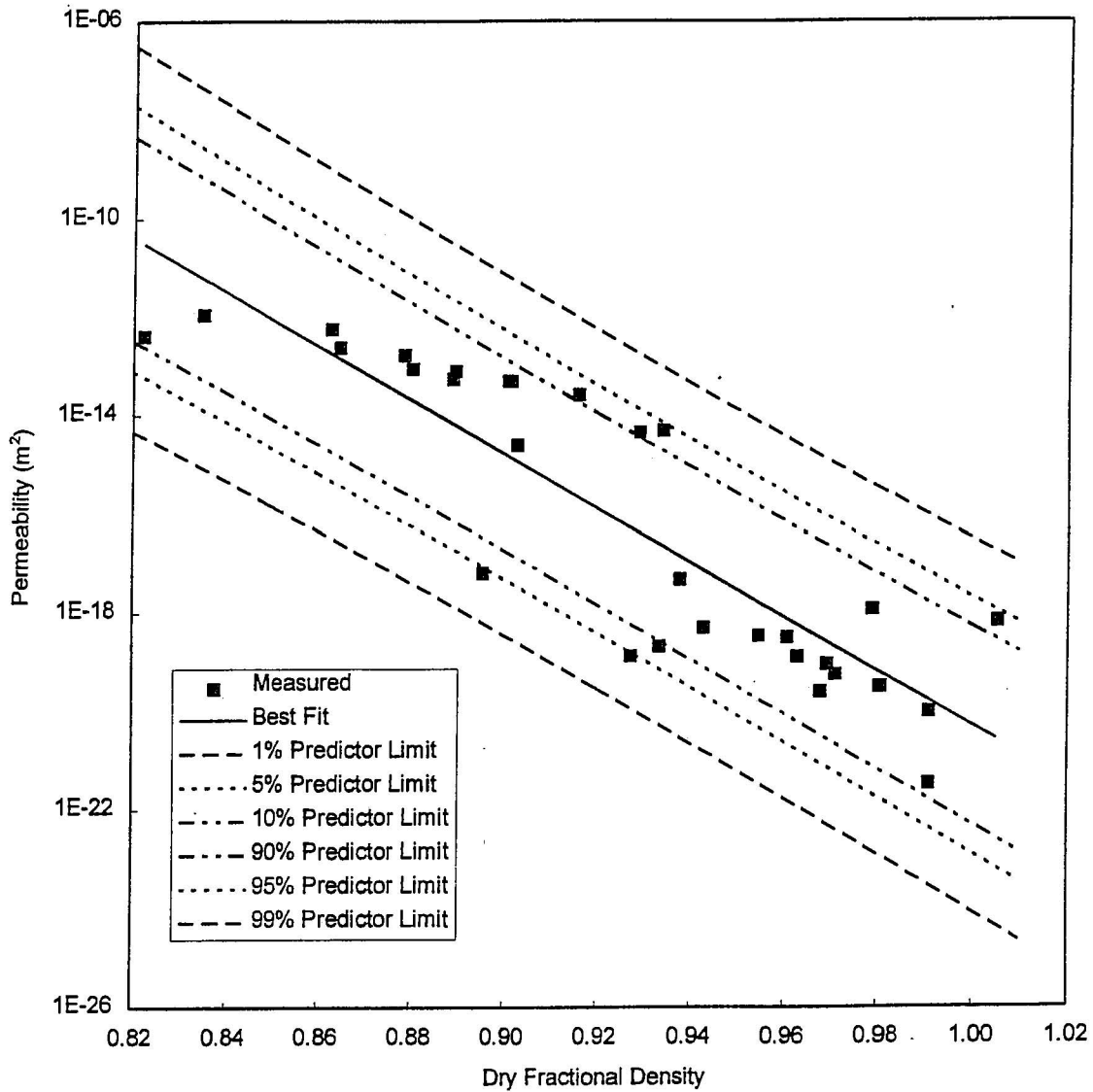
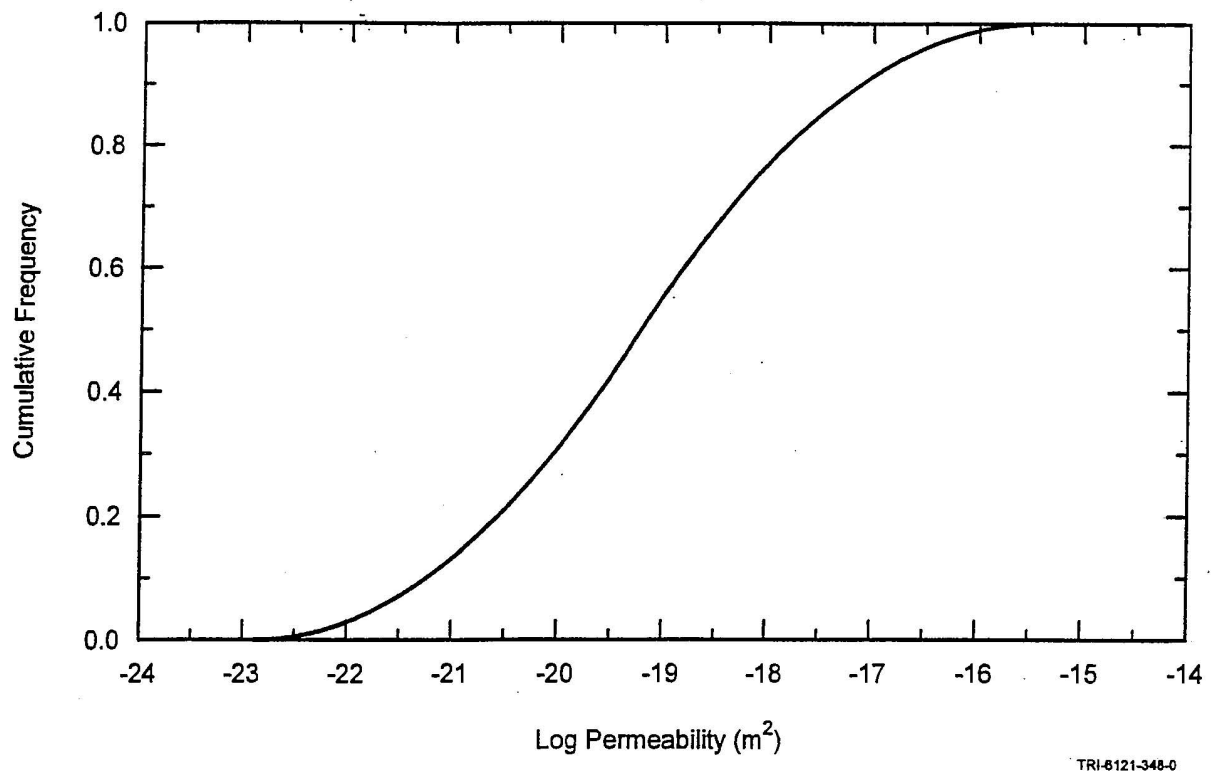


Figure G2A-6  
Fractional Density of the Consolidating Salt Column



**Figure G2A-7**  
**Permeability of Consolidated Crushed Salt as a Function of Fractional Density**



**Figure G2A-8**  
**Compacted Salt Column Permeability Cumulative Frequency Distribution Function at Seal**  
**Midpoint 100 Years Following Closure**

**ATTACHMENT G2  
APPENDIX G2-B**

**SHAFT SEALING CONSTRUCTION PROCEDURES**

**SHAFT SEALING SYSTEM  
COMPLIANCE SUBMITTAL DESIGN REPORT**

**ATTACHMENT G2  
APPENDIX **G2-B****

**SHAFT SEALING CONSTRUCTION PROCEDURES**

**SHAFT SEALING SYSTEM  
COMPLIANCE SUBMITTAL DESIGN REPORT**

**Appendix B Abstract**

This appendix describes equipment and procedures used to construct the shaft seals as specified in Permit Attachment G2. Existing or reasonably modified construction equipment is specified, standard mining practices are applied, and a general schedule is provided at the end of this appendix. This appendix describes the following activities:

- pre-sealing activities for the sub-surface and surface,
- construction and operation of a multi-deck stage,
- installation of special concrete (sumps, shaft station monoliths, and concrete plugs),
- installation of compacted clay columns,
- emplacement and dynamic compaction of WIPP salt,
- installation of neat asphalt and asphaltic mastic mix,
- grouting of concrete plugs and the country rock behind existing shaft liners,
- removal of portions of the existing shaft liners, and
- emplacement of compacted earthen fill.

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## FIGURES

<b>Figure</b>	<b>Title</b>
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Figure G2B-6	Plan and Section Views of Upward Spin Pattern of Grout Holes



## 1 **B1. Introduction**

2 This appendix describes construction specifications for placement of shaft seal materials.  
3 Flexibility is incorporated in construction specifications to facilitate placement of several different  
4 material types. Engineering materials used to seal the full length of the shaft include earthen fill,  
5 compacted clay, tamped crushed salt, asphalt, concrete, and a combination of concrete and  
6 asphalt in concrete-asphalt waterstops. Appendix A of Permit Attachment G2 provides details of  
7 the materials. A full-length shaft seal of this type has never before been constructed; however,  
8 application of available technology and equipment, standard construction practices, and  
9 common materials provides confidence that the system can be placed to satisfy the design  
10 requirements.

11 A primary feature of the construction specification is development of a work platform from which  
12 seal materials are placed. Although the proposed multi-deck stage (galloway) proposed here is  
13 engineered specifically for shaft sealing operations, it is similar to stages used for construction  
14 of shafts. Inherently flexible, the multi-deck stage facilitates several construction methods  
15 required for the various materials specified for the shaft seal system. It provides an assembly of  
16 a slickline and header for transport of flowable materials from the surface to the placement  
17 horizon. A crane device is attached to the base of the stage to facilitate compaction, and an  
18 avenue through the stage provides a means to transport bulk material. It is understood that  
19 procedures specified here may change during the tens of years preceding construction as a  
20 result of equipment development, additional testing, or design changes. Further, it is  
21 acknowledged that the construction methods specified are not the only methods that could  
22 place the seal materials successfully.

23 A few assumptions are made for purposes of evaluating construction activities. These  
24 assumptions are not binding, but are included to assist discussion of general operational  
25 scenarios. For example, four multi-deck stages are specified, one for each shaft. This  
26 specification is based on shaft-sinking experience, which indicates that because of the wear  
27 encountered, it is advisable to replace rather than rebuild stages. However, much of the  
28 equipment on the multi-deck stage is reused. For scheduling purposes, it is assumed that  
29 sealing operations are conducted in two of the four shafts simultaneously. The Air Intake and  
30 Exhaust Shafts are sealed first, and the Waste and Salt Handling Shafts are sealed last. With  
31 this approach, shaft sealing will require about six and a half years, excluding related work  
32 undertaken by the WIPP Management and Operating Contractor (**MOC**). Sealing the shafts  
33 sequentially would require approximately eleven and a half years. To facilitate discussion of  
34 scheduling and responsibilities, it is assumed that sealing operations will be conducted by a  
35 contractor other than the MOC.

36 Years from now, when actual construction begins, it is probable that alternatives may be  
37 favored. Therefore, construction procedures note alternative methods in recognition that  
38 changes are likely and that the construction strategy is sufficiently robust to accommodate  
39 alternatives. This appendix contains both general and very specific information. It begins with a  
40 discussion of general mobilization in Section 2. Details of the multi-deck construction stage are  
41 provided in Section 3. Section 4 contains descriptions of the construction activities. Information  
42 presented here is supplemented by several engineering drawings and sketches contained in  
43 Permit Attachment G2, Appendix E. The topical information and the level of provided detail  
44 substantiate the theory that reliable shaft seal construction is possible using available  
45 technology and materials.

## 1 **B2. Project Mobilization**

2 The duty descriptions that follow are for discussion purposes. The discussions do not  
3 presuppose contractual arrangements, but simply identify tasks necessary for shaft seal  
4 construction.

### 5 **B2.1 Subsurface**

6 Prior to initiation of sealing activities, the MOC will remove installations and equipment on the  
7 repository level. A determination of items removed will be made before construction begins.  
8 Such removal would include, but is not limited to, gates and fences at the shaft; equipment such  
9 as winches, ventilation fans, pipelines; and communication and power cables. Additionally, the  
10 following items will be removed from the shafts:

- 11 • cables, counterweights, and sheaves;
- 12 • existing waterlines; and
- 13 • electrical cables not required for sealing operations.

14 The following equipment will be stored near the shaft on the repository level by the Sealing  
15 Contractor prior to initiation of sealing activities:

- 16 • a concrete header, hopper, and pump;
- 17 • a concrete pump line to distribute concrete; and
- 18 • an auxiliary mine fan and sufficient flexible ventilation tubing to reach work areas  
19 required for installation of the shaft station concrete monolith.

20 The subsurface will be prepared adequately for placement of the shaft station monolith.  
21 Determination of other preparatory requirements may be necessary at the time of construction.

### 22 **B2.2 Surface**

23 The MOC will remove surface facilities such as headframes, hoists, and buildings to provide  
24 clear space for the Sealing Contractor. Utilities required for sealing activities (e.g., air  
25 compressors, water, electrical power and communication lines) will be preserved. The Sealing  
26 Contractor will establish a site office and facilities required to support the construction crews,  
27 including a change house, lamp room, warehouse, maintenance shop, and security provisions.  
28 Locations will be selected and foundations constructed for headframes, multi-deck stage  
29 winches, man/equipment hoist, and exhaust fan. A drawing in Permit Attachment G2, Appendix  
30 E (Sketch E-4) depicts a typical headframe and associated surface facilities. The hoist and  
31 winches will be enclosed in suitable buildings; utilities and ventilation ducting will be extended to  
32 the shaft collar. The large ventilation fan located near the collar is designed to exhaust air  
33 through the rigid ventilation duct, resulting in the movement of fresh air down the shaft. Air flow  
34 will be sufficient to support eight workers to the depth of the repository level. The following  
35 facilities will be procured and positioned near the shaft collar:

- 36 • a concrete batch plant capable of weighing, batching, and mixing the concrete to  
37 design specifications;

- 1           • a crushing and screening plant to process WIPP salt and local soil;
- 2           • an insulated and heated pug mill, asphalt pump, asphalt storage tank, and other
- 3           auxiliary equipment; and
- 4           • pads, silos, and structures to protect sealing materials from the weather.

5   The Sealing Contractor will construct a temporary structural steel bulkhead over the shaft at the  
6   surface. The bulkhead will be sufficiently strong to support the weight of the multi-deck stage,  
7   which will be constructed on it. When the multi-deck stage is completed, the headframe will be  
8   erected. The headframe (depicted in Permit Attachment G2, Appendix E, Sketch E-3) will be  
9   built around the multi-deck stage, and a mobile crane will be required during fabrication. When  
10   the headframe is completed, cables for hoisting and lowering the multi-deck stage will be  
11   installed. Cables will run from the three winches, over the sheaves in the headframe, down and  
12   under the sheaves on the multi-deck stage, and up to anchors in the headframe. The headframe  
13   will be sufficiently high to permit the multi-deck stage to be hoisted until the lowest component is  
14   3.05 m (10 ft) above surface. This will facilitate slinging equipment below the multi-deck stage  
15   and lowering it to the work surface, as well as activities required at the collar during asphalt  
16   emplacement.

17   The multi-deck stage will be lowered to clear the collar, allowing the installation of compressed-  
18   air-activated steel shaft collar doors, which will serve as a safety device, permitting safe access  
19   to the man cage and bucket, while preventing objects from falling down the shaft. Following  
20   installation of these doors, workers will utilize the multi-deck stage to traverse the shaft from the  
21   collar to the repository horizon, inspecting it for safety hazards and making any necessary  
22   repairs. After this inspection, the multi-deck stage will return to the surface.

### 23   **B2.3 Installation of Utilities**

24   In preparation for placement of shaft seal materials, requisite utilities will be outfitted for  
25   operations. The multi-deck stage will descend from the collar to the repository horizon. As  
26   added assurance against unwanted water, a gathering system similar to the one currently in  
27   place at the bottom of the concrete liner will be installed and moved upward as seal  
28   emplacement proceeds. Water collected will be hoisted to the surface for disposal. Additionally,  
29   any significant inflow will be located and minimized by grouting. After installation of the water  
30   gathering system, the following utilities will be installed from surface to the repository horizon by  
31   securely fastening them to the shaft wall:

- 32           • 5.1-cm steel waterline with automatic shut-off valves every 60 m;
- 33           • 10.2-cm steel compressed-air line;
- 34           • power, signal, and communications cables;
- 35           • 15.2 cm steel slickline and header; and
- 36           • a rigid, cylindrical, ventilation duct, which would range from 107 cm in diameter in the
- 37           three largest shafts to 91 cm in diameter in the Salt Handling Shaft.

### 1 **B3. Multi-Deck Stage**

2 The multi-deck stage (galloway) provides a work platform from which all sealing operations  
3 except placement of asphalt are conducted. The concept of using a multi-deck stage is derived  
4 from similar equipment commonly employed during shaft sinking operations. Plan and section  
5 views of conceptual multi-deck stages are shown in Permit Attachment G2, Appendix E,  
6 Sketches E-1 and E-2. The construction decks specified here are modified from typical shaft  
7 sinking configurations in two important ways to facilitate construction. Conceptual illustrations of  
8 these two modifications are displayed in Figures G2B-1 and G2B-2. Figure G2B-1 illustrates the  
9 multi-deck performing dynamic compaction of salt. Figure G2B-2 illustrates the multi-deck stage  
10 configured for excavation of the kerf required for the asphalt waterstop in Salado salt.

11 A device called a polar crane mounted below the lower deck can be configured for either  
12 dynamic compaction or salt excavation. The crane can rotate 360° horizontally by actuating its  
13 geared track drive. Its maximum rotational speed will be approximately two revolutions per  
14 minute. The crane can be controlled manually or by computer (computerized control will swiftly  
15 position the tamper in the numerous drop positions required for dynamic compaction). When  
16 excavation for the concrete-asphalt waterstops is required, the tamper, electromagnet, and  
17 cable used for dynamic compaction will be removed, and a custom salt undercutter will be  
18 mounted on the polar crane trolley. Geared drives on the crane, trolley, and undercutter will  
19 supply the force required for excavation. In addition to the special features noted above and  
20 shown in Figures G2B-1 and G2B-2, the multi-deck stage has the following equipment and  
21 capabilities:

- 22 • Maximum hoisting/lowering speed is approximately 4.6 m (15 ft) per minute.
- 23 • A cable, electromagnet, and tamper will be attached to the polar crane during dynamic  
24 compaction. The cylindrical tamper consists of A-36 carbon steel plates bolted  
25 together with high-tensile-strength steel bolts. It is hoisted and dropped by the polar  
26 crane using the electromagnet. The tamper will be mechanically secured to the polar  
27 crane before personnel are allowed under it.
- 28 • Range-finding lasers will facilitate the accurate positioning of the multi-deck stage  
29 above the work surface and allow the operator to determine when the surface is  
30 sufficiently level. The distance indicated by each laser will be displayed on a monitor at  
31 the crane control station.
- 32 • Flood lights and remotely controlled closed-circuit television equipment will enable the  
33 crane operator to view operations below the multi-deck stage on a monitor.
- 34 • Fold-out floor extensions that accommodate the variance in shaft diameter between  
35 the unlined and lined portions of the shaft will be provided for safety.
- 36 • A cutout in each deck, combined with a removable section of the polar crane track, will  
37 permit stage movement without removal of the rigid ventilation duct (which is fastened  
38 to the shaft wall).

1 The multi-deck stage is equipped with many of the features found on conventional shaft sinking  
2 stages, such as:

- 3 • three independent hoisting/lowering cables,
- 4 • man and material conveyances capable of passing through the multi-deck stage and  
5 accessing the working surface below,
- 6 • a jib crane that can be used to service the working surface below,
- 7 • removable safety screens and railings, and
- 8 • centering devices.

9 Three sets of double locking devices are provided to secure the multi-deck stage to the shaft  
10 wall. A suitable factor of safety for these locking devices is judged to be 4. The area of the grips  
11 securing the deck is calculated from static principles:

$$12 \quad FS = \mu(Co)(A)/W \quad (B-1)$$

13 where:

- 14  $FS$  = factor of safety
- 15  $\mu$  = steel/salt friction coefficient = 0.15 (see Table 20.1 in McClintock and Aragon, 1966;  
16 and Van Sambeek, 1988)
- 17  $Co$  = compressive strength of WIPP salt, which varies from 172 kg/cm<sup>2</sup> to 262 kg/cm<sup>2</sup> (Van  
18 Sambeek, 1988)
- 19  $W$  = total vertical weight
- 20  $A$  = total gripper pad surface area.

21 Manipulating the equation to solve for required area, applying a factor of safety of 4, selecting  
22 the heaviest work stage (753,832 kg) and the minimum compressive strength value for salt  
23 (assuming that the locking pressure equals the minimum compressive strength of salt), the  
24 following gripper surface area ( $A$ ) is:

$$25 \quad A = 4(753,832 \text{ kg})/0.15(172 \text{ kg/cm}^2) = 11,416.5 \text{ cm}^2, \text{ and each of the six gripper}$$

26 pads would be 1902.8 cm<sup>2</sup>.

27 As designed, each gripper pad area is 2167.2 cm<sup>2</sup>, resulting in a factor of safety ( $FS$ ) of 4.56.  
28 Additionally, although tension in the hoisting cables is relaxed while the multi-deck stage is in  
29 the locked configuration, the cables are still available to hold the work-deck, should the locking  
30 devices fail.

#### 31 **B4. Placement of Sealing Materials**

32 Construction activities include placement of materials in three basic ways: (1) by slickline (e.g.,  
33 concrete and asphalt), (2) by compaction (e.g., salt and earthen fill), and (3) by physical  
34 placement (e.g., clay blocks). Materials will be placed at various elevations using identical  
35 procedures. Because placement procedures generally are identical regardless of elevation, they

1 will be described only once. Where differences occur, they will be identified and described. In  
2 general, placement of shaft seal elements is described from bottom to top.

### 3 **B4.1 Concrete**

4 Concrete is used as a seal material for several different components, such as the existing  
5 sumps in the Salt Handling Shaft and the Waste Shaft, the shaft station monoliths, concrete  
6 plugs, and concrete-asphalt waterstops. Existing sumps are shown in Permit Attachment G2,  
7 Appendix E, Drawings SNL-007, Sheets 6 and 21. Shaft station monoliths are shown in  
8 Drawings SNL-007, Sheets 6, 11, 16, and 21. Concrete plugs are depicted on Drawings SNL-  
9 007, Sheets 4, 5, 9, 10, 14, 15, 19, and 20. Lower, middle, and upper concrete-asphalt  
10 waterstops are shown in Drawing SNL-007, Sheet 22. Construction material for all concrete  
11 members will be Salado Mass Concrete (SMC).

12 As specified, all SMC will be mixed on surface to produce a product possessing the  
13 characteristics defined in Permit Attachment G2, Appendix A. Concrete will be transferred to its  
14 placement location within the shaft via slickline and header. The slickline (shown in Figure G2B-  
15 1) is a steel pipe fastened to the shaft wall. Vertical drops as great as 656 m to the repository  
16 horizon are required. Such concrete transport and construction are common in mining  
17 applications. For example, a large copper mine in Arizona is placing concrete at a depth of 797  
18 m using this procedure. A header attached to the bottom of the slickline is designed to absorb  
19 kinetic energy generated by the falling material. The header, a steel pipe slightly larger in  
20 diameter than the slickline and made of thicker steel, diverts the flow 45°, absorbing most of the  
21 impact. Because the drop generates considerable force, the header will be securely supported  
22 by a reinforced steel shelf bolted to the shaft wall. A flexible hose, in sections approximately 3 m  
23 long and joined by quick-connect fittings, will be attached to the header.

#### 24 **B4.1.1 Shaft Station Monolith**

25 Construction of the shaft station monoliths is preceded by filling two existing sumps with SMC.  
26 Initially, sufficient hose will be used to convey the concrete to the bottom of the sump. The  
27 discharge will remain below the concrete surface during placement to minimize air entrainment.  
28 Sections of hose will be withdrawn and removed as the SMC rises to the floor of the repository  
29 horizon in a continuous pour. Subsequent to filling the sump, arrangements will be made to  
30 place the concrete monolith.

31 A small mine fan will be located above the rigid suction-duct inlet to ensure a fresh air base.  
32 Masonry block forms will be constructed at the extremities of the shaft station monolith in the  
33 drifts leading from the station. Temporary forms, partially filling the opening, will be erected at  
34 the shafts to facilitate the placement of the outermost concrete. These temporary forms will  
35 permit access necessary to ensure adequate concrete placement. SMC will be transported via  
36 the slickline to the header, which will discharge into a hopper feeding the concrete pump, and  
37 the pump will be attached to the pumpcrete line. The pumpcrete line, suspended in cable slings  
38 near the back of the drifts, will be extended to the outer forms. A flexible hose, attached to the  
39 end of the pumpcrete line, will be used by workers to direct emplacement. The pumpcrete line  
40 will be withdrawn as emplacement proceeds toward the shaft.

41 When the concrete has reached the top of the temporary forms, they will be extended to seal  
42 the openings completely, and two 5-cm-diameter polyvinyl chloride (PVC) pipes will be  
43 incorporated in the upper portion of each form. Both pipes will be situated in a vertical plane



1 oriented on the long axis of the heading and inclined away from the station at approximately 70°  
2 to the horizontal. The upper end of the top pipe will extend to just below the back, and the upper  
3 end of the lower pipe will be located just below that of the top pipe. SMC will be injected through  
4 the lower pipe until return is obtained from the upper pipe, ensuring that the heading has been  
5 filled to the back. The header will then be moved to a position in the shaft above the designed  
6 elevation at the top of the shaft station monolith and supported by a bracket bolted to the shaft  
7 wall. After the outer concrete has achieved stability, the temporary interior forms may be  
8 removed. Equipment no longer required will be slung below the multi-deck stage and hoisted to  
9 surface for storage and later use. The station and shaft will be filled to design elevation with  
10 concrete via the slickline, header, and flexible hose. The slickline is cleaned with spherical,  
11 neoprene swabs (“pigs”) that are pumped through the slickline, header, and hose.

#### 12 **B4.1.2 Concrete-Asphalt Waterstops**

13 Lower, middle, and upper concrete-asphalt waterstops in a given shaft are identical and consist  
14 of two SMC sections separated by an asphalt waterstop. Before the bottom member of the  
15 lower concrete component is placed, the multi-deck stage will be raised into the headframe; the  
16 polar crane will be mounted below the lower deck; and the salt undercutter will be mounted on  
17 the crane trolley. The multi-deck stage will then return to the elevation of the concrete  
18 component. Two undercutter bars will be used to make the necessary excavations for upper,  
19 middle, and lower asphalt-concrete waterstops and the concrete plug above the Salado  
20 Formation. Notches for the plugs will be excavated using a short, rigid cutter bar (length less  
21 than half the radius). The kerf for the asphalt waterstop will be excavated using a long cutter bar  
22 that can excavate the walls to a depth of one shaft radius. These operations will be conducted  
23 as required as seal placement proceeds upward.

24 The lower concrete member (and all subsequent concrete entities) will be placed via the  
25 slickline, header, and flexible hose, using the procedure outlined for the shaft station monolith.  
26 Construction of vertical shaft seals provides the ideal situation for minimizing interface  
27 permeability between the rock and seal materials. Concrete will flow under its own weight to  
28 provide intimate contact. A tight cohesive interface was demonstrated for concrete in the small-  
29 scale seal performance tests (SSSPTs). The SSSPT concrete plugs were nearly impermeable  
30 without grouting. However, interface grouting is usually performed in similar construction, and it  
31 will be done here in the appropriate locations.

#### 32 **B4.1.3 Concrete Plugs**

33 An SMC plug, keyed into the shaft wall, is situated a few meters above the upper Salado  
34 contact in the Rustler Formation. A final SMC plug is located a few meters below surface in the  
35 Dewey Lake Redbeds. This plug is emplaced within the existing shaft liner using the same  
36 construction technique employed for the concrete-asphalt waterstops.

### 37 **B4.2 Clay**

#### 38 **B4.2.1 Salado and Rustler Compacted Clay Column**

39 Blocks of sodium bentonite clay, precompacted to a density of 1.8 to 2.0 g/cm<sup>3</sup>, will be the  
40 sealing material. This density has been achieved at the WIPP using a compaction pressure of  
41 492.2 kg/cm<sup>2</sup> in a machine designed to produce adobe blocks (Knowles and Howard, 1996).  
42 Blocks are envisioned as cubes, 20.8 cm on the edge, weighing approximately 18 kg, a



1 reasonable weight for workers to handle. The bentonite blocks will be compacted at the WIPP in  
2 a new custom block-compacting machine and will be stored in controlled humidity to prevent  
3 desiccation cracking. Blocks will be transported from surface in the man cage, which will be  
4 sized to fit through the circular “bucket hole” in the multi-deck stage. The conveyance will be  
5 stacked with blocks to a height of approximately 1.8 m.

6 Installation will consist of manually stacking individual blocks so that all interfaces are in contact.  
7 Block surfaces will be moistened with a spray of potable water as the blocks are placed to  
8 initiate a minor amount of swelling, which will ensure a tight fit and a decrease in permeability.  
9 Peripheral blocks will be trimmed to fit irregularities in the shaft wall and placed as close to the  
10 wall as possible. Trimmed material will be manually removed with a vacuum. Dry bentonite will  
11 be manually tamped into remaining voids in each layer of blocks. This procedure will be  
12 repeated throughout the clay column. The multi-deck stage will, in all cases, be raised and  
13 utilities removed to the surface as emplacement of sealing materials proceeds upward.

14 Dynamic compaction construction is an alternative method of clay emplacement that could be  
15 considered in the detailed design. Dynamic compaction materials being considered are:

- 16 • sodium bentonite/fine silica sand, and
- 17 • highly compressed bentonite pellets.

18 Boonsinsuk et al. (1991) developed and tested a dynamic (drop hammer) method for a relatively  
19 large diameter (0.5-m) hole, simulated with a steel cylinder, that gave very good results on 1 : 1  
20 dry mass mixtures of sodium bentonite and sand, at a moisture content of 17% to 19%. The  
21 alternatives have the advantages of simplifying emplacement.

### 22 **B4.3 Asphalt**

23 Asphalt, produced as a distillate of petroleum, is selected as the seal material because of its  
24 longevity, extremely low permeability, history of successful use as a shaft lining material, and its  
25 ability to heal if deformed. Shielded from ultraviolet radiation and mixed with hydrated lime to  
26 inhibit microbial degradation, the longevity of the asphalt will be great. Emplaced by tremie line  
27 at the temperature specified, the material will be fluid and self-leveling, ensuring complete  
28 contact with the salt.

29 Construction of an asphalt column using heated asphalt will introduce heat to the surrounding  
30 salt. The thermal shock and heat dissipation through the salt has not been studied in detail.  
31 Performance of the asphalt column may be enhanced by the introduction of the heat that results  
32 from acceleration of creep and healing of microfractures. If, upon further study, the  
33 thermomechanical effects are deemed undesirable or if an alternative construction method is  
34 preferred at a later date, asphalt can readily be placed as blocks. Asphalt can “cold flow” to fill  
35 gaps, or the seams between blocks can be filled with low-viscosity material.

#### 36 **B4.3.1 Concrete-Asphalt Waterstops**

37 Electrically insulated, steel grated flooring will be constructed over the shaft at the surface. A  
38 second, similar flooring will be built in the shaft 3 m below the first. These floors will be used  
39 only during the emplacement of asphalt and asphaltic mastic mix (AMM) and will be removed at  
40 all other times. A 12.7-cm ID/14-cm OD, 4130 steel pipe (tremie line) in 3-m lengths will be  
41 electrically equipped for impedance heating, then insulated and suspended in the shaft from

1 slips (pipe holding devices) situated on the upper floor. The tremie line cross-sectional area is  
2 smallest at the shoulder of the top thread, where tensional yield is 50,000 kg; the line weight is  
3 20.8 kg/m. Heavier weights are routinely suspended in this manner in the petroleum and mining  
4 industries.

5 Neat, AR-4000-graded petroleum-based asphalt cement will be the sealing material for asphalt  
6 waterstops. Neat asphalt from the refinery will be delivered to the WIPP at approximately 80°C  
7 in conventional, insulated refinery trucks and pumped into a heated and insulated storage tank  
8 located near the shaft. The multi-deck stage will be hoisted into the headframe and  
9 mechanically secured for safety. Asphalt, heated to 180°C ±5°, will be pumped down the shaft  
10 to the fill elevation through the heated tremie line. Viscosity of the neat asphalt for the  
11 waterstops will be sufficiently low to allow limited penetration of the DRZ. Installation of asphalt  
12 in each of the concrete-waterstops is identical.

13 As the pipe is lowered, workers on the lower deck will attach the wiring required for heating  
14 circuits and apply insulation. Workers on the top deck will install flanged and electrically  
15 insulated couplings as required (the opening in the slip bowl will be large enough to permit the  
16 passage of these couplings). Properly equipping and lowering the pipe should progress at the  
17 rate of one section every 10 minutes. The lower asphalt waterstop requires approximately 607  
18 m of pipe for a casing weight of 12,700 kg. Additionally, electrical wire and insulation will weigh  
19 about 7250 kg for a total equipped tremie line weight of 20,000 kg. Therefore, the safety factor  
20 for the tremie line is 50,000 kg/20,000 kg, or 2.5.

21 To minimize air entrainment, the lower end of the tremie line will be immersed as much as 1 m  
22 during hot asphalt emplacement. Therefore, the lower 3 m of casing will be left bare (to simplify  
23 cleaning when emplacement has been completed).

24 Initially the tremie line will be lowered until it contacts the concrete plug (immediately underlying  
25 the excavation for the waterstop) and then raised approximately 0.3 m. Asphalt emplacement  
26 will proceed as follows:

- 27 • The impedance heating system will be energized, heating the tremie line to 180°C ±5°,  
28 and the asphalt in the storage tank will be heated to approximately 180°C ±5°.
- 29 • Heated, neat asphalt will be pumped down the tremie line at a rate approximating  
30 13 L/min. This low rate will ensure that the asphalt flows across the plug from the  
31 insertion point, completely filling the excavation and shaft to the design elevation.
- 32 • The tremie line will be raised 3 m and cleaned by pumping a neoprene swab through it  
33 with air pressure. Impedance heating will be stopped, and the line will be allowed to  
34 cool. When cool, the line will be hoisted, stripped, cleaned, disassembled, and stored  
35 for future use.

36 Sealing operations will be suspended until the air temperature at the top of the asphalt has  
37 fallen to approximately 50°C for the comfort of the workers when they resume activity at the fill  
38 horizon. Temperature will be determined by lowering a remotely read thermometer to an  
39 elevation approximately 3 m above the asphalt at the center of the shaft. The temperature of the  
40 asphalt at the center of the shaft will be 50°C in about a month, but active ventilation should  
41 permit work to resume in about two weeks (see calculations in Appendix D of *Waste Isolation*

1 *Pilot Plant Shaft Sealing System Compliance Submittal Design Report (“Compliance Submittal*  
2 *Design Report”)* (Sandia, 1996)).

3 When sufficient cooling has occurred, workers will descend in the multi-deck stage and cover  
4 the hot asphalt with an insulating and structural material such as fiber-reinforced shotcrete, as  
5 illustrated in Figure G2B-3. To accomplish this, they will spray cementitious shotcrete containing  
6 fibrillated polypropylene fibers (for added tensional strength), attaining a minimum thickness of  
7 approximately 0.6 m.

### 8 **B4.3.2 Asphaltic Mastic Mix Column**

9 Asphaltic mastic mix (AMM) for the column will be prepared on surface in a pug mill. Viscosity of  
10 the AMM can be tailored to provide desired properties such as limited migration into large  
11 fractures.

12 • AMM will be prepared by mixing the ingredients in the pug mill, which has been heated  
13 to  $180^{\circ}\text{C} \pm 5^{\circ}$ . The mix will be pumped from the pug mill through the tremie line to the  
14 emplacement depth. AMM is self-leveling at this temperature, and its hydrostatic head  
15 will ensure intimate contact with the shaft walls.

16 • Pumping rate will be approximately 200 L/min for efficiency, because of the larger  
17 volume (approximately 1,224,700 L in the Air Intake Shaft). To facilitate efficient  
18 emplacement and avoid air entrainment, the tremie line will not be shortened until the  
19 mix has filled 6 vertical meters of the shaft. Back pressure (approximately  $0.84 \text{ kg/cm}^2$ )  
20 resulting from 6 m of AMM above the discharge point will be easily overcome from  
21 surface by the hydraulic head.

22 After 6 vertical meters of AMM have been placed:

23 • Impedance heating current will be turned off and locked out (the hot line will drain  
24 completely).

25 • To prevent excessive back pressure resulting from AMM above the insertion point, the  
26 line will be disconnected from the pump and hoisted hot. Two sections will be stripped,  
27 removed, cleaned with a “pig,” and stacked near the shaft.

28 • Electrical feed will be adjusted (because of the decreased resistance of the shortened  
29 line).

30 • The tremie line will be reconnected to the pump.

31 • The impedance heating system will be energized.

32 • When the temperature of the line has stabilized at  $180^{\circ}\text{C} \pm 5^{\circ}$ , pumping will resume.

33 This procedure will be followed until the entire column, including the volume computed to  
34 counteract 0.9 m of vertical shrinkage (calculations in Appendix D of the Compliance Submittal  
35 Design Report (Sandia, 1996)), has been placed. The line will be disconnected from the pump  
36 and cleaned by pumping “pigs” through it with air pressure. It will then be hoisted, stripped,  
37 removed in 3-m sections, and stacked on surface for reuse.

1 Sealing operations will be suspended following removal of the tremie line, and ventilation will be  
2 continuous to speed cooling. The column will shrink vertically but maintain contact with the shaft  
3 walls as it cools. When the air temperature at 3 m above the asphalt has cooled sufficiently,  
4 workers will descend on the multi-deck stage and cover the hot asphalt with fibercrete as  
5 described for the concrete-asphalt waterstop (Permit Attachment G2, Appendix B, Section  
6 B4.3.1) and illustrated in Figure G2B-3.

7 Note: Near the top of the Salado Formation, portions of the concrete liner key, chemical seal  
8 rings, and concrete and steel shaft liners will be removed. Liner removal will occur before  
9 emplacement of AMM. For safety, exposed rock will be secured with horizontal, radial rock bolts  
10 and cyclone steel mesh. A range-finding device, fastened to the shaft wall approximately 3 m  
11 above the proposed top of the asphaltic column, will indicate when the hot AMM reaches the  
12 desired elevation. A remotely read thermometer, affixed to the shaft wall approximately 2 m  
13 above the proposed top of the column, will show when the air temperature has fallen sufficiently  
14 to resume operations. The intake of the rigid ventilation duct will be positioned approximately  
15 3 m above the proposed top of the column, and ventilation will be continuous throughout  
16 emplacement and cooling of the asphaltic column. After the multi-deck stage has been hoisted  
17 into the headframe and mechanically secured for safety, emplacement of AMM will proceed.

#### 18 **B4.4 Compacted Salt Column**

19 Crushed, mine-run salt, dynamically compacted against intact Salado salt, is the major long-  
20 term shaft seal element. As-mined WIPP salt will be crushed and screened to a maximum  
21 particle dimension of 5 mm. The salt will be transferred from surface to the fill elevation via the  
22 slickline and header. A flexible hose attached to the header will be used to emplace the salt,  
23 and a calculated weight of water will be added. After the salt has been nominally leveled, it will  
24 be dynamically compacted. Dynamic compaction consists of compacting material by dropping a  
25 tamper on it and delivering a specified amount of energy. The application of three times  
26 Modified Procter Energy (MPE) to each lift (one MPE equals 2,700,000 Joules/m<sup>3</sup>) will result in  
27 compacting the salt to 90% of the density of in-place rock salt.

28 Approximately 170 vertical meters of salt will be dynamically compacted. Dynamic compaction  
29 was validated in a large-scale demonstration at Sandia National Laboratories during 1995. As-  
30 mined WIPP salt was dynamically compacted to 90% density of in-place rock salt in a cylindrical  
31 steel chamber simulating the Salt Handling Shaft (Ahrens and Hansen, 1995). Depth of  
32 compaction is greater than that achieved by most other methods, allowing the emplacement of  
33 thicker lifts. For example, dropping the 4.69 metric ton tamper 18 m (as specified below) results  
34 in a compaction depth of approximately 4.6 m, allowing emplacement of lifts 1.5-m high. Most  
35 other compaction methods are limited to lifts of 0.3 m or less. Lift thickness will be increased  
36 and drop height decreased for the initial lift above the concrete plug at the base of the salt  
37 column to ensure that the concrete is not damaged. Drop height for the second and third lifts will  
38 be decreased as well. Although the tamper impact is thereby reduced, three MPE will be  
39 delivered to the entire salt column.

40 If lifts are 1.5-m thick, the third lift below the surface will receive additional densification during  
41 compaction of overlying lifts, and this phenomenon will proceed up the shaft. Construction will  
42 begin by hoisting the multi-deck stage to the surface and attaching the cable, electromagnet,  
43 and tamper to the hoist on the polar crane. The multi-deck assembly will be lowered to the  
44 placement elevation, and moisture content of the crushed and screened salt will be calibrated.  
45 Then the salt will be conveyed at a measured rate via a weighbelt conveyor to a vibrator-

1 equipped hopper overlying the 15.2-cm ID slickline. The salt will pass down the slickline and exit  
2 a flexible hose connected to the header. A worker will direct the discharge so that the upper  
3 surface of the lift is nominally level and suitable for dynamic compaction. A second worker will  
4 add potable water, in the form of a fine spray, to the salt as it exits the hose. Water volume will  
5 be electronically controlled and coordinated with the weight of the salt to achieve the desired  
6 moisture content.

7 The initial lift above the SMC will be 4.6 m, and drop height will be 6 m. This increased lift  
8 thickness and reduced drop height are specified to protect the underlying SMC plug from  
9 damage and/or displacement from tamper impact. Compaction depth for a drop height of 6 m is  
10 approximately 3.7 m. Ultimately, the tamper will be dropped six times in each position, resulting  
11 in a total of 132 drops per lift in the larger shafts. The drop pattern is shown in Figure G2B-4. A  
12 salt lift 1.5 m high will then be placed and leveled. Following compaction of the initial lift, the  
13 multi-deck stage will be positioned so the base of the hoisted tamper is 10 m above the surface  
14 of the salt.

15 The multi-deck stage will then be secured to the shaft walls by activating hydraulically powered  
16 locking devices. Hydraulic pressure will be maintained on these units when they are in the  
17 locked position; in addition, a mechanical pawl and ratchet on each pair will prevent loosening.  
18 The safety factor for the locking devices has been calculated to be approximately 4.5. After  
19 locking, tension in the hoisting cables will be relaxed, and centering rams will be activated to  
20 level the decks. Prior to positioning the stage, tension will be applied to the hoisting cables; the  
21 centering rams will be retracted; and the locking devices will be disengaged.

22 The work deck will be hoisted until the base of the retracted tamper is 23 m above the surface of  
23 the salt, where it will be locked into position and leveled as described above. This procedure,  
24 repeated throughout the salt column, allows emplacement and compaction of three lifts (1.5-m  
25 thick) per multi-deck stage move. Depth of compaction for a drop height of 18 m is  
26 approximately 4.6 m. Therefore the third lift below the fill surface will receive a total of 9 MPE  
27 ( $274,560 \text{ m kg/m}^3$ ), matching the energy applied in the successful, large-scale demonstration.

28 The compactive effect expands laterally as it proceeds downward from the base of the tamper  
29 and will effectively compact the salt into irregularities in the shaft wall, as demonstrated in the  
30 large-scale demonstration. Although other techniques could be used, dynamic compaction was  
31 selected because it is simple, can be used in the WIPP shafts, and has been demonstrated  
32 (Hansen and Ahrens, 1996).

33 The tamper will be dropped from the hoisted position by turning off the power to the  
34 electromagnet. Immediately upon release, the crane operator will “chase” the tamper by  
35 lowering the electromagnet at twice hoisting speed; the magnet will engage the tamper, allowing  
36 it to be hoisted for the subsequent drop. Initially, the tamper will be dropped in positions that  
37 avoid impact craters caused by preceding drops. The surface will then be leveled manually and  
38 the tamper dropped in positions omitted during the previous drop series.

39 Experience gained during the large-scale salt compaction demonstration indicated that a  
40 considerable volume of dust is generated during the emplacement of the salt, but not during  
41 dynamic compaction. However, because the intake of the rigid vent duct is below the multi-deck  
42 stage, workers below the stage will wear respirators during emplacement. They will be the only  
43 workers affected by dust during dynamic compaction.

1 The Air Intake Shaft will require 22 drop positions (Figure G2B-4). Application of one MPE  
2 requires six drops in each position, for a total of 132 drops per lift. Three MPE, a total of 396  
3 drops per lift, will be applied to all salt. After each compaction cycle, the salt surface will be  
4 leveled manually and the tamper will be dropped in positions omitted in the preceding drop  
5 series. Two lifts, each 1.8 m high, will then be sequentially placed, leveled, and compacted with  
6 two MPE, using a 6-m drop height.

7 Dynamic compaction ensures a tight interface. Salt compacted during the large-scale dynamic  
8 compaction demonstration adhered so tenaciously to the smooth interior walls of the steel  
9 compaction chamber that grinders with stiff wire wheels were required for its removal.

#### 10 **B4.5 Grout**

11 Ultrafine sulfate-resistant cementitious grout (Ahrens et al., 1996) is selected as the sealing  
12 material. Specifically developed for use at the WIPP, and successfully demonstrated in an in  
13 situ test, the hardened grout has a permeability of  $1 \times 10^{-21} \text{ m}^2$ . It has the ability to penetrate  
14 fractures smaller than 6 microns and is being used for the following purposes:

- 15 • to seal many of the microfractures in the DRZ and ensure a tight interface between  
16 SMC and the enclosing rock, and
- 17 • to solidify fractured rock behind existing concrete shaft liners, prior to removal of the  
18 liner (for worker safety).

19 The interface between concrete plugs in the Salado Formation (and one in the Rustler  
20 Formation, a short distance above the Salado) will be grouted. A 45° downward-opening cone of  
21 reverse circulation diamond drill holes will be collared in the top of the plugs, drilled in a spin  
22 pattern (see Figure G2B-5), and stage grouted with ultrafine cementitious grout at 3.5 kg/cm<sup>2</sup>  
23 below lithostatic pressure. Stage grouting consists of:

- 24 • drilling and grouting primary holes, one at a time;
- 25 • drilling and grouting secondary holes, one at a time, on either side of the primary holes  
26 that accepted grout; and
- 27 • (if necessary) drilling and grouting tertiary holes on either side of secondary holes that  
28 accepted grout.

29 Note: For safety, all liner removal tasks will be accomplished from the bottom deck. In areas  
30 where the steel liner is removed, it will be cut into manageable pieces with a cutting torch and  
31 hoisted to the surface for disposal. Mechanical methods will be employed to clean and roughen  
32 the existing concrete shaft liner before placing the Dewey Lake SMC plug in the shafts.

33 The work sequence will start 3 m below the lower elevation of liner removal. A 45° upward-  
34 opening cone of grout injection holes, drilled in a “spin” pattern (Figure G2B-6), will be drilled to  
35 a depth subtending one shaft radius on a horizontal plane. These holes will be stage grouted as  
36 described in Section 4.5. Noncoring, reverse circulation, diamond drill equipment will be used to  
37 avoid plugging fractures with fine-grained diamond drill cuttings. Ultrafine cementitious grout will  
38 be mixed on the surface, transferred via the slickline to the upper deck of the multi-deck stage,  
39 and injected at 3.5 kg/cm<sup>2</sup> gage below lithostatic pressure to avoid hydrofracturing the rock.



1 Grout will be transferred in batches, and after each transfer, a “pig” will be pumped through the  
2 slickline and header to clean them. Grouting will proceed upward from the lowest fan to the  
3 highest. Recent studies conducted in the Air Intake Shaft (Dale and Hurtado, 1996) show that  
4 this hole depth exceeds that required for complete penetration of the Disturbed Rock Zone  
5 (DRZ). Maximum horizontal spacing at the ends of the holes will be 3 m.

6 The multi-deck stage will then be raised 3 m and a second fan, identical to the first, will be  
7 drilled and grouted. This procedure will continue, with grout fans 3 m apart vertically, until the  
8 highest fan, located 3 m above the highest point of liner removal, has been drilled and grouted.  
9 Ultrafine cementitious grout was observed to penetrate more than 2 m in the underground  
10 grouting experiment conducted at the WIPP in Room L-3 (Ahrens and Onofrei, 1996).

11 When grouting is completed, the multi-deck stage will be lowered to the bottom of the liner  
12 removal section and a hole will be made through the concrete liner. This hole, approximately 30  
13 cm in diameter, will serve as “free-face” to which the liner will be broken. Similar establishment  
14 and utilization of free face is a common practice in hard rock mining (e.g., the central drill hole in  
15 a series drilled into the rock to be blasted is left empty and used as free-face to which  
16 explosives in adjacent holes break the rock). Radial, horizontal percussion holes will be drilled  
17 on a 30-cm grid (or less, if required), covering the liner to be removed. Hydraulic wedges,  
18 activated in these holes, will then break out the liner, starting adjacent to the free face and  
19 progressing away from it, from the bottom up. Broken fragments of the concrete liner will fall to  
20 the fill surface below.

21 A mucking “claw,” suspended from the trolley of the polar crane, will collect the broken concrete  
22 and place it in the bucket for removal to the surface. As many as three buckets can be used to  
23 speed this work.

#### 24 **B4.6 Compacted Earthen Fill**

25 Local soil, screened to a maximum particle dimension of 13 mm, will be placed and compacted  
26 to inhibit the migration of surficial water into the shaft cross section. Such movement is further  
27 decreased by a 12-m high SMC plug at the top of the Dewey Lake Redbeds.

##### 28 **B4.6.1 Lower Section**

29 Emplacement of the compacted earthen fill will proceed as follows:

- 30 • Moisture content of the screened soil will be determined.
- 31 • The soil will then be transferred via the slickline, header, and flexible hose from  
32 surface to the fill elevation. The moisture content optimal for compaction will be  
33 achieved using the same procedure as described for compacted salt (Permit  
34 Attachment G2, Appendix B, Section B4.4). The soil will be emplaced in lifts 1.2 m high  
35 (depth of compaction is approximately 3.7 m) and dynamically compacted using a drop  
36 height of 18.3 m.
- 37 • The fill will be dynamically compacted until its hydraulic conductivity to water is  
38 nominally equivalent to that of the surrounding formation.

1 This procedure will continue until the lower section has been emplaced and compacted. Care  
2 will be exercised at the top of the column to ensure that all soil receives sufficient compaction.

### 3 **B4.6.2 Upper Section**

4 The upper section contains insufficient room to employ dynamic compaction. Therefore the  
5 screened soil, emplaced as described above, will be compacted by vibratory-impact sheepsfoot  
6 roller, vibratory sheepsfoot roller, or a walk-behind vibratory-plate compactor. Because of the  
7 limited compaction depth of this equipment, lifts will be 0.3 m high. The top of the fill will be  
8 coordinated with the MOC to accommodate plans for decommissioning surface facilities and  
9 placing markers.

### 10 **B4.7 Schedule**

11 Preliminary construction schedules are included on the following pages. The first schedule is a  
12 concise outline of the total construction schedule. It is followed by individual schedules for each  
13 shaft. The first schedule in each shaft series is a truncated schedule showing the major  
14 milestones. The truncated schedules are followed by detailed construction schedules for each  
15 shaft. These schedules indicate that it will take approximately six and a half years to complete  
16 the shaft sealing operations, assuming two shafts are simultaneously sealed.

17



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## SEALING SCHEDULE - ALL SHAFTS

2

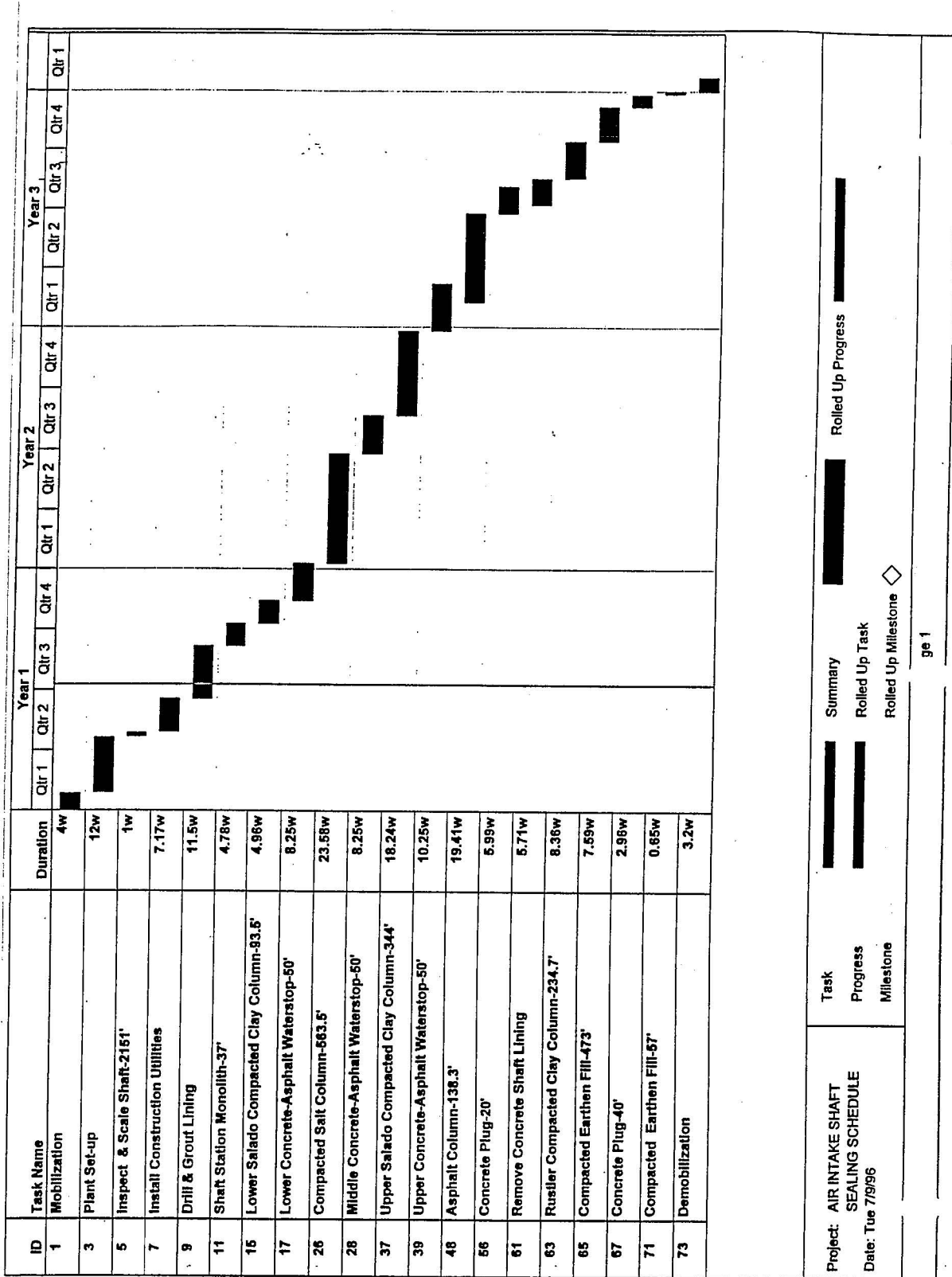


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## SEALING SCHEDULE - AIR INTAKE SHAFT

2

Waste Isolation Pilot Plant  
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Project: AIR INTAKE SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

Task Summary  
 Progress Rolled Up Task  
 Milestone Rolled Up Milestone

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ID	Task Name	Duration	Year 1				Year 2				Year 3						
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4			
1	Mobilization	4w	■														
2	Mobilize	4w	■														
3	Plant Set-up	12w	■	■													
4	Plant Set-up	12w	■	■													
5	Inspect & Scale Shaft-2161'	1w		■													
6	Inspect & Scale Shaft	1w		■													
7	Install Construction Utilities	7.17w		■	■												
8	Install Utilities	7.17w		■	■												
9	Drill & Grout Lining	11.5w			■	■											
10	Drill & Grout Lining	11.5w			■	■											
11	Shaft Station Monolith-37'	4.78w				■	■										
12	Construct Bulkheads	0.8w					■										
13	Pour Concrete (37' high)	0.98w					■										
14	Cure Concrete	3w						■									
15	Lower Salado Compacted Clay Column-93.5'	4.96w						■	■								
16	Emplace Bentonite Blocks (93.5' high)	4.96w						■	■								
17	Lower Concrete-Asphalt Waterstop-50'	8.25w							■	■							
18	Excavate for Lower Plug	1.67w								■							
19	Pour Concrete-Lower Plug (23' high typ.)	0.28w									■						
20	Excavate Waterstop	0.63w										■					
21	Place Asphalt (4' high typ.)	0.72w											■				
22	Cool-down Asphalt	1w												■			

Project: AIR INTAKE SHAFT SEALING SCHEDULE  
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Task: ■ Summary ■ Rolled Up Progress ■  
 Progress: ■ Rolled Up Task ■  
 Milestone: ■ Rolled Up Milestone ◇

1  
2

ID	Task Name	Duration	Year 1				Year 2				Year 3			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
23	Excavate for Upper Plug	1.67W												
24	Pour Concrete-Upper Plug (23' high typ.)	0.28W												
25	Cure Concrete	2W												
26	Compacted Salt Column-563.5'	23.58W												
27	Emplace & Compact Crushed/Screened Salt	23.58W												
28	Middle Concrete-Asphalt Waterstop-50'	8.25W												
29	Excavate for Lower Plug	1.67W												
30	Pour Concrete-Lower Plug	0.28W												
31	Excavate Waterstop	0.63W												
32	Place Asphalt	0.72W												
33	Cool-down Asphalt	1W												
34	Excavate for Upper Plug	1.67W												
35	Pour Concrete-Upper Plug	0.28W												
36	Cure Concrete	2W												
37	Upper Salado Compacted Clay Column-344'	18.24W												
38	Emplace Bentonite Blocks	18.24W												
39	Upper Concrete-Asphalt Waterstop-50'	10.25W												
40	Excavate for Lower Plug	1.67W												
41	Pour Concrete-Lower Plug	0.28W												
42	Excavate Waterstop	0.63W												
43	Place Asphalt	0.72W												
44	Cool-down Asphalt	1W												

Project: AIR INTAKE SHAFT SEALING SCHEDULE Date: Tue 7/9/96	Task Progress Milestone	Summary Rolled Up Task Rolled Up Milestone	Rolled Up Progress
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1  
2

ID	Task Name	Duration	Year 1				Year 2				Year 3			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
45	Excavate for Upper Plug	1.67w												
46	Pour Concrete-Upper Plug	0.28w												
47	Cure Concrete	4w												
48	Asphalt Column-138.3'	19.41w												
49	Remove Lining in Key	3.76w												
50	Remove Chemical Seal Rings	0.6w												
51	Mobilize to Emplace Asphalt	0.3w												
52	Asphalt in Salt Section	3.62w												
53	Asphalt in Lower Lined Section	1.93w												
54	Complete Asphalt Emplacement	2.77w												
55	Cool-down Asphalt	6.43w												
56	Concrete Plug-20'	5.99w												
57	Remove Concrete Lining & Rock	1.65w												
58	Remove Liner Plate	0.13w												
59	Pour Concrete(20' high)	0.21w												
60	Cure Concrete	4w												
61	Remove Concrete Shaft Lining	5.71w												
62	Remove 86' of lining-4 zones	5.71w												
63	Rustler Compacted Clay Column-234.7'	8.36w												
64	Emplace & Compact Bentonite(234.7' high)	8.36w												
65	Compacted Earthen Fill-473'	7.59w												
66	Emplace & Compact Earthen Fill(473' high)	7.59w												

Project: AIR INTAKE SHAFT  
 SEALING SCHEDULE  
 Date: Tue 7/9/98

Task Progress Milestone

Summary Rolled Up Task Rolled Up Milestone

Rolled Up Progress

1  
2

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ID	Task Name	Duration	Year 1				Year 2				Year 3							
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4				
67	Concrete Plug-40'	2.96w																
68	Clean Existing Surface	0.6w																
69	Pour Concrete(40' high)	0.36w																
70	Cure Concrete	2w																
71	Compacted Earthen Fill-57'	0.65w																
72	Emplace & Compact Earthen Fill (57' high)	0.65w																
73	Demobilization	3.2w																
74	Demob	3.2w																

Project: AIR INTAKE SHAFT SEALING SCHEDULE Date: Tue 7/9/96	Task Progress Milestone	Summary Rolled Up Task Rolled Up Milestone	Rolled Up Progress Rolled Up Milestone
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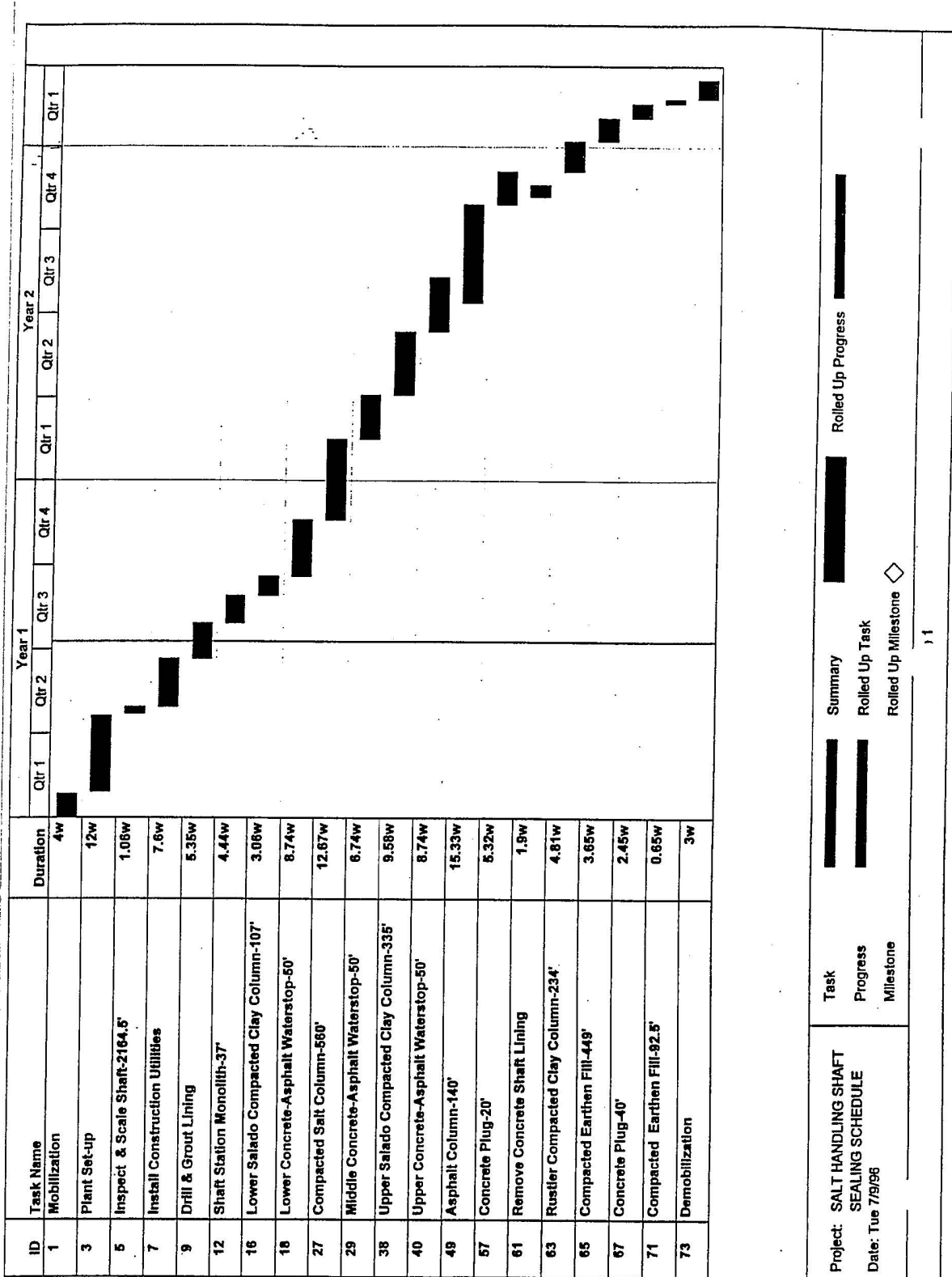
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## SEALING SCHEDULE - SALT HANDLING SHAFT

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
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2

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
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ID	Task Name	Duration	Year 1				Year 2						
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4			
1	Mobilization	4w	■										
2	Mobilize	4w	■										
3	Plant Set-up	12w		■									
4	Plant Set-up	12w		■									
5	Inspect & Scale Shaft-2164.5'	1.06w			■								
6	Inspect & Scale Shaft	1.06w			■								
7	Install Construction Utilities	7.6w		■									
8	Install Utilities	7.6w		■									
9	Drill & Grout Lining	5.35w			■								
10	Drill Grout Holes	2.14w			■								
11	Grout Lining	3.21w			■								
12	Shaft Station Monolith-37'	4.44w				■							
13	Construct Bulkheads	0.8w				■							
14	Pour Concrete (37' high)	0.64w				■							
15	Cure Concrete	3w				■							
16	Lower Salado Compacted Clay Column-107'	3.06w					■						
17	Emplace Bentonite Blocks (107.0' high)	3.06w					■						
18	Lower Concrete-Asphalt Waterstop-50'	8.74w						■					
19	Excavate for Lower Plug	1.36w						■					
20	Pour Concrete-Lower Plug (23' high-tyt)	0.17w						■					
21	Excavate Waterstop	0.34w						■					
22	Place Asphalt (4' high-tyt)	0.3w						■					

Project: SALT HANDLING SHAFT  
 SEALING SCHEDULE  
 Date: Tue 7/9/96

Task ■  
 Progress ■  
 Milestone ◇

Summary ■  
 Rolled Up Task ■  
 Rolled Up Milestone ◇

Roll Up Progress ■

1  
2

ID	Task Name	Duration	Year 1				Year 2						
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4			
23	Cool-down Asphalt	1w											
24	Excavate for Upper Plug	1.38w											
25	Pour Concrete-Upper Plug (23' high-tp)	0.17w											
26	Cure Concrete	4w											
27	Compacted Salt Column-560'	12.67w											
28	Emplace & Compact Crushed/Screened Salt	12.67w											
29	Middle Concrete-Asphalt Waterstop-50'	6.74w											
30	Excavate for Lower Plug	1.38w											
31	Pour Concrete-Lower Plug	0.17w											
32	Excavate Waterstop	0.34w											
33	Place Asphalt	0.3w											
34	Cool-down Asphalt	1w											
35	Excavate for Upper Plug	1.38w											
36	Pour Concrete-Upper Plug	0.17w											
37	Cure Concrete	2w											
38	Upper Salado Compacted Clay Column-335'	9.58w											
39	Emplace Bentonite Blocks	9.58w											
40	Upper Concrete-Asphalt Waterstop-50'	8.74w											
41	Excavate for Lower Plug	1.38w											
42	Pour Concrete-Lower Plug	0.17w											
43	Excavate Waterstop	0.34w											
44	Place Asphalt	0.3w											

Task	Summary	Rolled Up Progress
Progress	Rolled Up Task	
Milestone	Rolled Up Milestone	

Project: SALT HANDLING SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

1  
2

ID	Task Name	Duration	Year 1				Year 2						
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4			
45	Cool-down Asphalt	1w											
46	Excavate for Upper Plug	1.38w											
47	Pour Concrete-Upper Plug	0.17w											
48	Cure Concrete	4w											
49	Asphalt Column-140'	15.33w											
50	Remove Lining In Key	2.02w											
51	Remove Chemical Seal Rings	0.4w											
52	Mobilize to emplace asphalt	2w											
53	Asphalt in Salt Section	2.73w											
54	Asphalt in Lower Lined Section	0.25w											
55	Complete Asphalt Emplacement	1.5w											
56	Cool-down Asphalt	6.43w											
57	Concrete Plug-20'	5.32w											
58	Remove Concrete Lining & Rock	1.11w											
59	Pour Concrete (20' high)	0.21w											
60	Cure Concrete	4w											
61	Remove Concrete Shaft Lining	1.9w											
62	Remove 72' of lining-4 zones	1.9w											
63	Rustler Compacted Clay Column-234'	4.81w											
64	Emplace & Compact Bentonite (234' high)	4.81w											
65	Compacted Earthen Fill-449'	3.65w											
66	Emplace & Compact Earthen Fill (449' high)	3.65w											

Summary  
 Rolled Up Progress  
 Rolled Up Task  
 Rolled Up Milestone

Project: SALT HANDLING SHAFT  
 SEALING SCHEDULE  
 Date: Tue 7/9/96

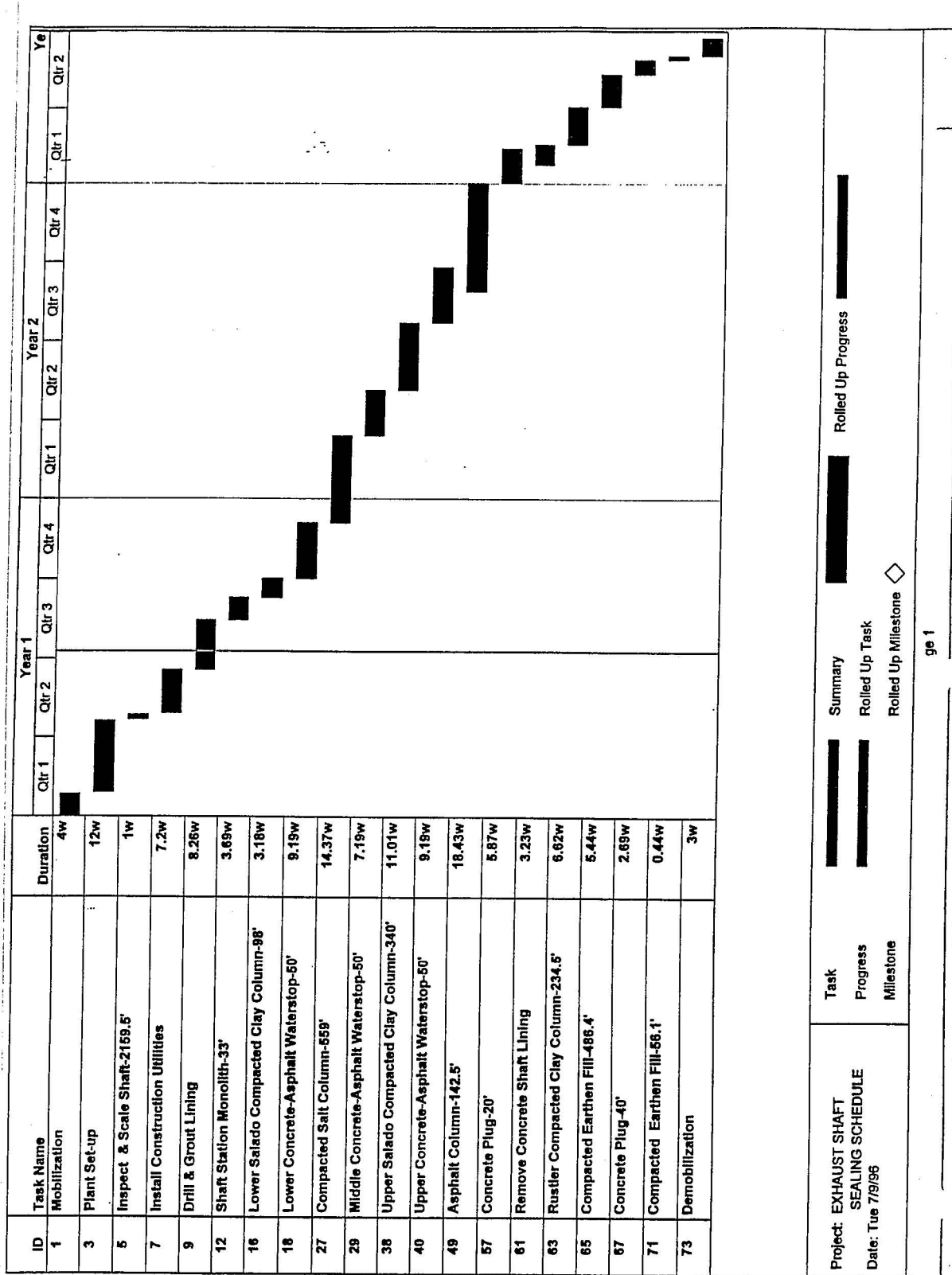
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## SEALING SCHEDULE - EXHAUST SHAFT

2



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2

Project: EXHAUST SHAFT  
 SEALING SCHEDULE  
 Date: Tue 7/9/96

Task  
 Progress  
 Milestone

Summary  
 Rolled Up Task  
 Rolled Up Milestone

Rolled Up Progress



ID	Task Name	Duration	Year 1				Year 2				Year			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2		
1	Mobilization	4w	■											
2	Mobilize	4w	■											
3	Plant Set-up	12w	■	■										
4	Plant Set-up	12w		■	■									
5	Inspect & Scale Shaft-2159.5'	1w			■									
6	Inspect & Scale Shaft	1w			■									
7	Install Construction Utilities	7.2w		■	■									
8	Install Utilities	7.2w		■	■									
9	Drill & Grout Lining	8.26w			■	■								
10	Drill Grout Holes	3.3w			■									
11	Grout Lining	4.96w			■									
12	Shaft Station Monolith-33'	3.69w			■									
13	Construct Bulkheads	0.4w			■									
14	Pour Concrete (33' high)	0.29w			■									
15	Cure Concrete	3w			■									
16	Lower Salado Compacted Clay Column-98'	3.18w			■									
17	Emplace Bentonite Blocks (98' high)	3.18w			■									
18	Lower Concrete-Asphalt Waterstop-50'	9.19w			■	■								
19	Excavate for Lower Plug	1.45w			■									
20	Pour Concrete-Lower Plug (23' high-ty)	0.22w			■									
21	Excavate Waterstop	0.47w			■									
22	Place Asphalt (4' high-ty)	0.38w			■									

Project: EXHAUST SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

Task Progress Milestone

Summary Rolled Up Task Rolled Up Milestone

Rolled Up Progress

ID	Task Name	Duration	Year 1				Year 2				Year				
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2			
23	Cool-down Asphalt	1w													
24	Excavate for Upper Plug	1.45w													
25	Pour Concrete-Upper Plug (23' high-tp)	0.22w													
26	Cure Concrete	4w													
27	Compacted Salt Column-559'	14.37w													
28	Emplace & Compact Crushed/Screened Salt	14.37w													
29	Middle Concrete-Asphalt Waterstop-50'	7.19w													
30	Excavate for Lower Plug	1.45w													
31	Pour Concrete-Lower Plug	0.22w													
32	Excavate Waterstop	0.47w													
33	Place Asphalt	0.38w													
34	Cool-down Asphalt	1w													
35	Excavate for Upper Plug	1.45w													
36	Pour Concrete-Upper Plug	0.22w													
37	Cure Concrete	2w													
38	Upper Salado Compacted Clay Column-340'	11.01w													
39	Emplace Bentonite Blocks(340' high)	11.01w													
40	Upper Concrete-Asphalt Waterstop-50'	9.19w													
41	Excavate for Lower Plug	1.45w													
42	Pour Concrete-Lower Plug	0.22w													
43	Excavate Waterstop	0.47w													
44	Place Asphalt	0.38w													

Project: EXHAUST SHAFT SEALING SCHEDULE	Task	Summary	Rolled Up Progress
Date: Tue 7/9/96	Progress	Rolled Up Task	
	Milestone	Rolled Up Milestone	

1  
2

ID	Task Name	Duration	Year 1				Year 2						
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4			
45	Cool-down Asphalt	1w											
46	Excavate for Upper Plug	1.45w											
47	Pour Concrete-Upper Plug	0.22w											
48	Cure Concrete	4w											
49	Asphalt Column-142.5'	18.43w											
50	Remove Lining In Key	3.15w											
51	Remove Chemical Seal Rings	0.5w											
52	Mobilize to Emplace Asphalt	2w											
53	Asphalt in Salt Section	2.64w											
54	Asphalt in Lower Lined Section	1.44w											
55	Complete Asphalt Emplacement	2.27w											
56	Cool-down Asphalt	6.43w											
57	Concrete Plug-20'	5.87w											
58	Remove Concrete Lining & Rock	1.7w											
59	Pour Concrete (20' high)	0.17w											
60	Cure Concrete	4w											
61	Remove Concrete Shaft Lining	3.23w											
62	Remove 84' of lining-4 zones	3.23w											
63	Rustler Compacted Clay Column-234.5'	6.62w											
64	Emplace & Compact Bentonite(234.5' high)	6.62w											
65	Compacted Earthen Fill-486.4'	5.44w											
66	Emplace & Compact Earthen Fill(486.4' high)	5.44w											

1  
2

Project: EXHAUST SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

Task Progress Milestone

Summary Rolled Up Task Rolled Up Milestone

Roll Up Progress

Roll Up Milestone

Waste Isolation Pilot Plant  
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 November 30, 2010 December 2022 Renewal Draft Permit

ID	Task Name	Duration	Year 1				Year 2				Year			
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2		
67	Concrete Plug-40'	2.69w												
68	Clean Existing Surface	0.47w												
69	Pour Concrete	0.22w												
70	Cure Concrete	2w												
71	Compacted Earthen Fill-56.1'	0.44w												
72	Emplace & Compact Earthen Fill (56.1'high)	0.44w												
73	Demobilization	3w												
74	Demob	3w												

<b>Task</b> Progress Milestone	<b>Summary</b> Rolled Up Task Rolled Up Milestone	Rolled Up Progress Rolled Up Milestone
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Project: EXHAUST SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

14

1  
2

1

## SEALING SCHEDULE - WASTE SHAFT

2

ID	Task Name	Duration	Year 1				Year 2				Year 3				Ye		
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	
1	Mobilization	4w															
3	Plant Set-up	12w															
5	Inspect & Scale Shaft-2159.5'	1w															
7	Install Construction Utilities	7.2w															
9	Drill & Grout Lining	11.21w															
12	Shaft Station Monolith-37'	5.17w															
16	Lower Salado Compacted Clay Column-98'	5.01w															
18	Lower Concrete-Asphalt Waterstop-50'	12.57w															
27	Compacted Salt Column-555.5'	22.87w															
29	Middle Concrete-Asphalt Waterstop-50'	10.57w															
38	Upper Salado Compacted Clay Column-351.5'	17.86w															
40	Upper Concrete-Asphalt Waterstop-50'	12.57w															
49	Asphalt Column-142.3'	20.71w															
57	Concrete Plug-20'	5.96w															
61	Remove Concrete Shaft Lining	5.07w															
63	Rustler Compacted Clay Column-234.7'	10.95w															
65	Compacted Earthen Fill-447'	8.25w															
67	Concrete Plug-40'	3.04w															
71	Compacted Earthen Fill-61.5'	1.14w															
73	Demobilization	3.5w															

1  
2

Project: WASTE HANDLING SHAFT  
 SEALING SCHEDULE  
 Date: Tue 7/9/96

Task  
 Progress  
 Milestone

Summary  
 Rolled Up Task  
 Rolled Up Milestone

ID	Task Name	Duration	Year 1				Year 2				Year 3				Year 4	
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2
1	Mobilization	4w	■													
2	Mobilize	4w	■													
3	Plant Set-up	12w	■	■												
4	Plant Set-up	12w		■	■											
5	Inspect & Scale Shaft-2159.5'	1w														
6	Inspect & Scale Shaft	1w														
7	Install Construction Utilities	7.2w					■									
8	Install Utilities	7.2w					■									
9	Drill & Grout Lining	11.21w						■								
10	Drill Grout Holes	4.48w						■								
11	Grout Lining	6.73w							■							
12	Shaft Station Monolith-37'	5.17w								■						
13	Construct Bulkheads	1w									■					
14	Pour Concrete (37' high)	1.17w										■				
15	Cure Concrete	3w											■			
16	Lower Salado Compacted Clay Column-86'	5.01w												■		
17	Emplace Bentonite Blocks (96' high)	5.01w													■	
18	Lower Concrete-Asphalt Waterstop-50'	12.57w														■
19	Excavate for Lower Plug	2.72w														■
20	Pour Concrete-Lower Plug (23' high-tp)	0.27w														■
21	Excavate Waterstop	0.84w														■
22	Place Asphalt (4' high-tp)	0.75w														■

1  
2

Project: WASTE HANDLING SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

Task Progress Milestone

Summary Rolled Up Task Rolled Up Milestone

Legend: ■ Task Progress, ■ Milestone, ◇ Milestone



Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-B  
 November 30, 2010 December 2022 Renewal Draft Permit

ID	Task Name	Duration	Year 1				Year 2				Year 3				Year 4	
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2
23	Cool-down Asphalt	1w														
24	Excavate for Upper Plug	2.72w														
25	Pour Concrete-Upper Plug (23' high-tp)	0.27w														
26	Cure Concrete	4w														
27	Compacted Salt Column-555.5'	22.87w														
28	Emplace & Compact Crushed/Screened Salt	22.87w														
29	Middle Concrete-Asphalt Waterstop-50'	10.57w														
30	Excavate for Lower Plug	2.72w														
31	Pour Concrete-Lower Plug	0.27w														
32	Excavate Waterstop	0.84w														
33	Place Asphalt	0.75w														
34	Cool-down Asphalt	1w														
35	Excavate for Upper Plug	2.72w														
36	Pour Concrete-Upper Plug	0.27w														
37	Cure Concrete	2w														
38	Upper Salado Compacted Clay Column-351.5'	17.86w														
39	Emplace Bentonite Blocks(351.5' high)	17.86w														
40	Upper Concrete-Asphalt Waterstop-50'	12.57w														
41	Excavate for Lower Plug	2.72w														
42	Pour Concrete-Lower Plug	0.27w														
43	Excavate Waterstop	0.84w														
44	Place Asphalt	0.75w														

Task	Summary	Rolled Up Progress
Progress	Rolled Up Task	
Milestone	Rolled Up Milestone	◇

Project: WASTE HANDLING SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

1  
2



ID	Task Name	Duration	Year 1				Year 2				Year 3				Ye		
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	
45	Cool-down Asphalt	1w															
46	Excavate for Upper Plug	2.72w															
47	Pour Concrete-Upper Plug	0.27w															
48	Cure Concrete	4w															
49	Asphalt Column-142.3'	20.71w															
50	Remove Lining in Key	3.8w															
51	Remove Chemical Seal Rings	0.6w															
52	Mobilize to emplace asphalt	0.3w															
53	Asphalt in Salt Section	4.01w															
54	Asphalt in Lower Lined Section	2.33w															
55	Complete Asphalt Emplacement	3.24w															
56	Cool-down Asphalt	6.43w															
57	Concrete Plug-20'	5.98w															
58	Remove Concrete Lining & Rock	1.73w															
59	Pour Concrete (20' high)	0.25w															
60	Cure Concrete	4w															
61	Remove Concrete Shaft Lining	5.07w															
62	Remove 64' of lining-4 zones	5.07w															
63	Rustier Compacted Clay Column-234.7'	10.99w															
64	Emplace & Compact Bentonite (234.7' high)	10.99w															
65	Compacted Earthen Fill-447'	8.25w															
66	Emplace & Compact Earthen Fill (447' high)	8.25w															

1  
2

Task: Task  
 Progress: Progress  
 Milestone: Milestone

Summary: Summary  
 Rolled Up Task: Rolled Up Task  
 Rolled Up Milestone: Rolled Up Milestone

Rolled Up Progress: Rolled Up Progress

Project: WASTE HANDLING SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-B  
 November 30, 2010 December 2022 Renewal Draft Permit

ID	Task Name	Duration	Year 1				Year 2				Year 3				Ye	
			Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2
67	Concrete Plug-40'	3.04w														
68	Clean Existing Surface	0.64w														
69	Pour Concrete	0.4w														
70	Cure Concrete	2w														
71	Compacted Earthen Fill-61.5'	1.14w														
72	Emplace & Compact Earthen Fill (61.5' high)	1.14w														
73	Demobilization	3.5w														
74	Demob	3.5w														

Task	Summary	Rolled Up Progress
Progress	Rolled Up Task	
Milestone	Rolled Up Milestone	

Project: WASTE HANDLING SHAFT SEALING SCHEDULE  
 Date: Tue 7/9/96

4

1  
2

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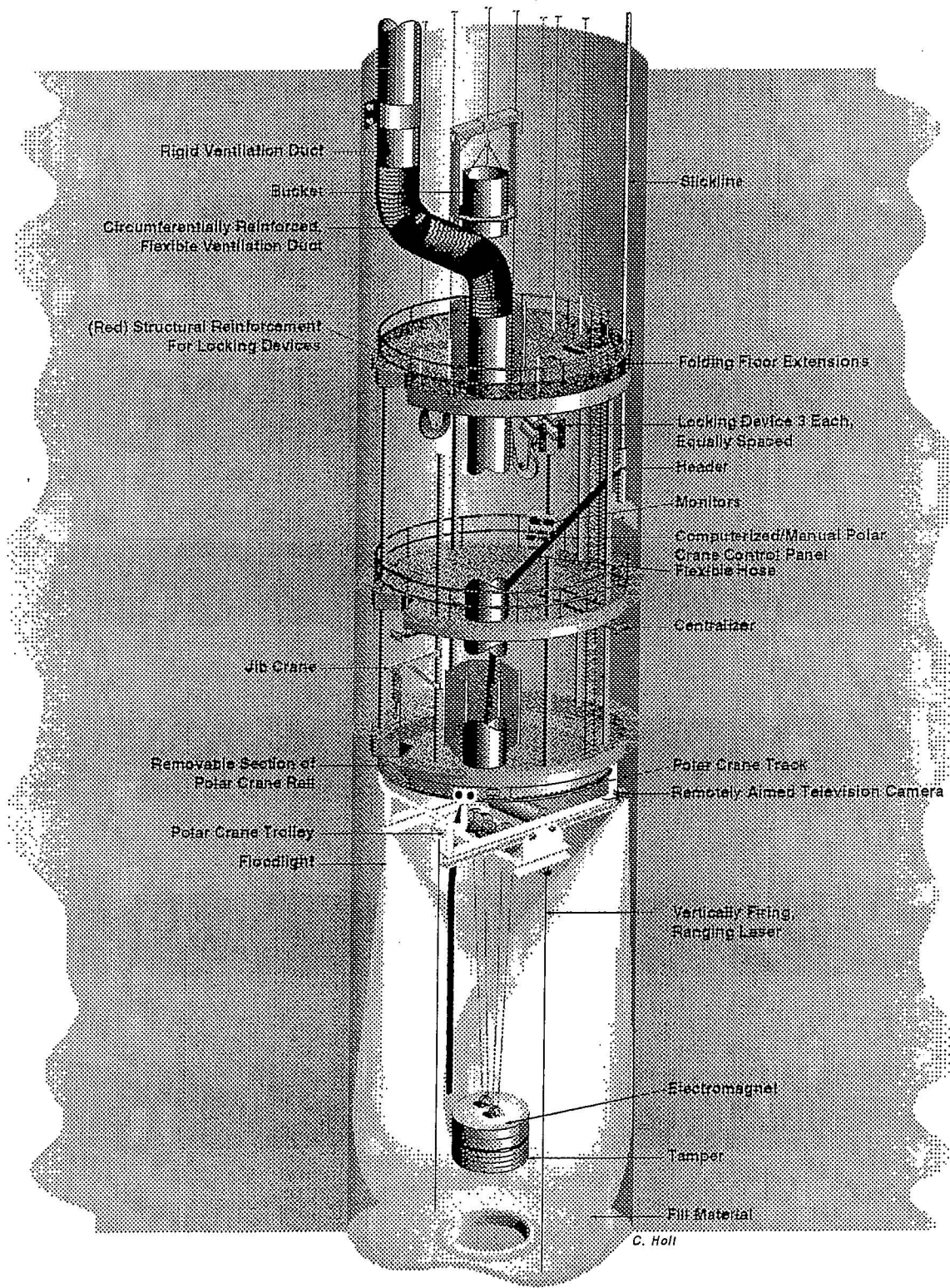
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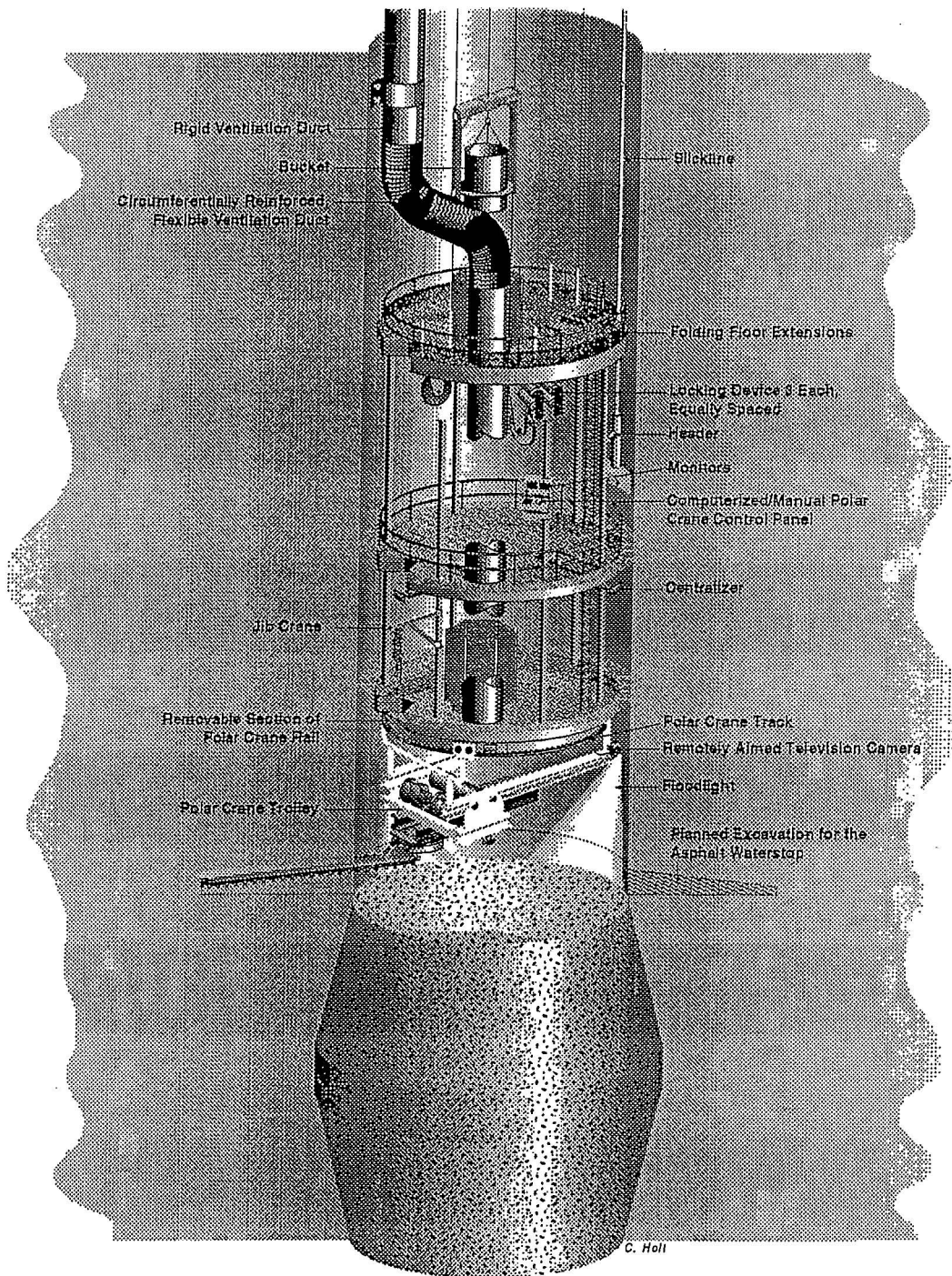
## FIGURES



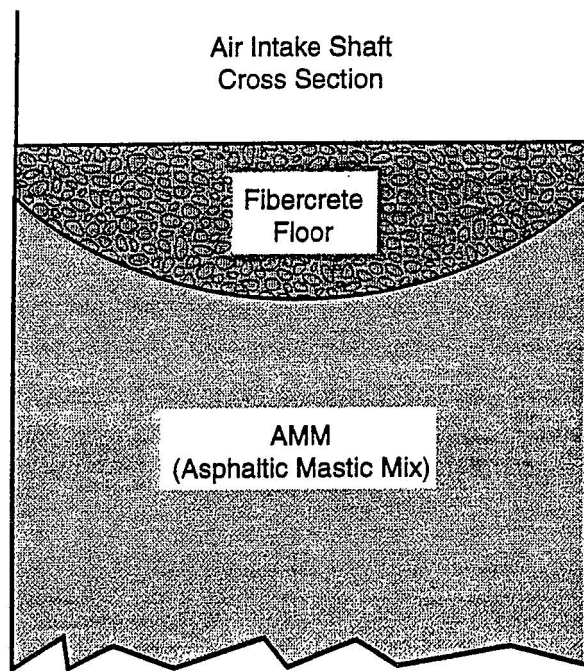


**Figure G2B-1**  
**Multi-Deck Stage Illustrating Dynamic Compaction**





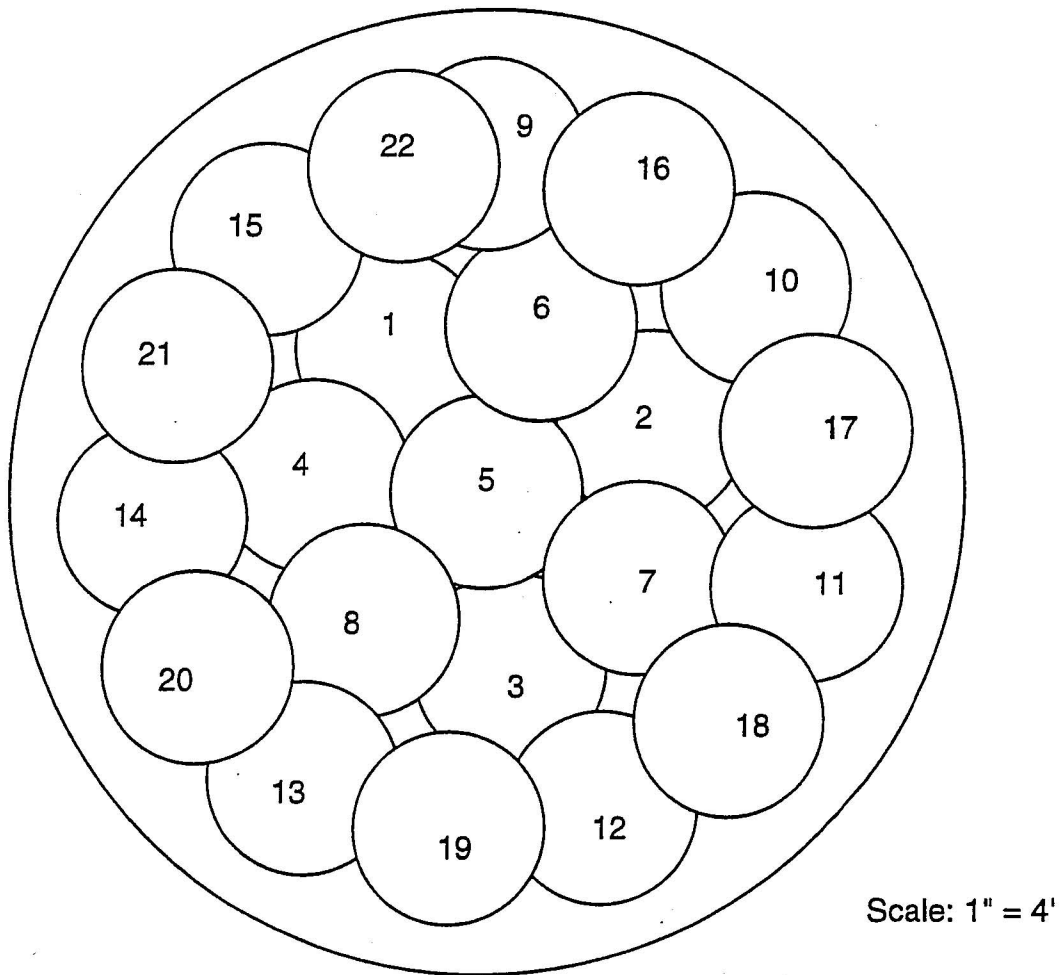
**Figure G2B-2**  
**Multi-Deck Stage Illustrating Excavation for Asphalt Waterstop**



TRI-6121-375-0

**Figure G2B-3**  
**Typical Fibercrete at Top of Asphalt**

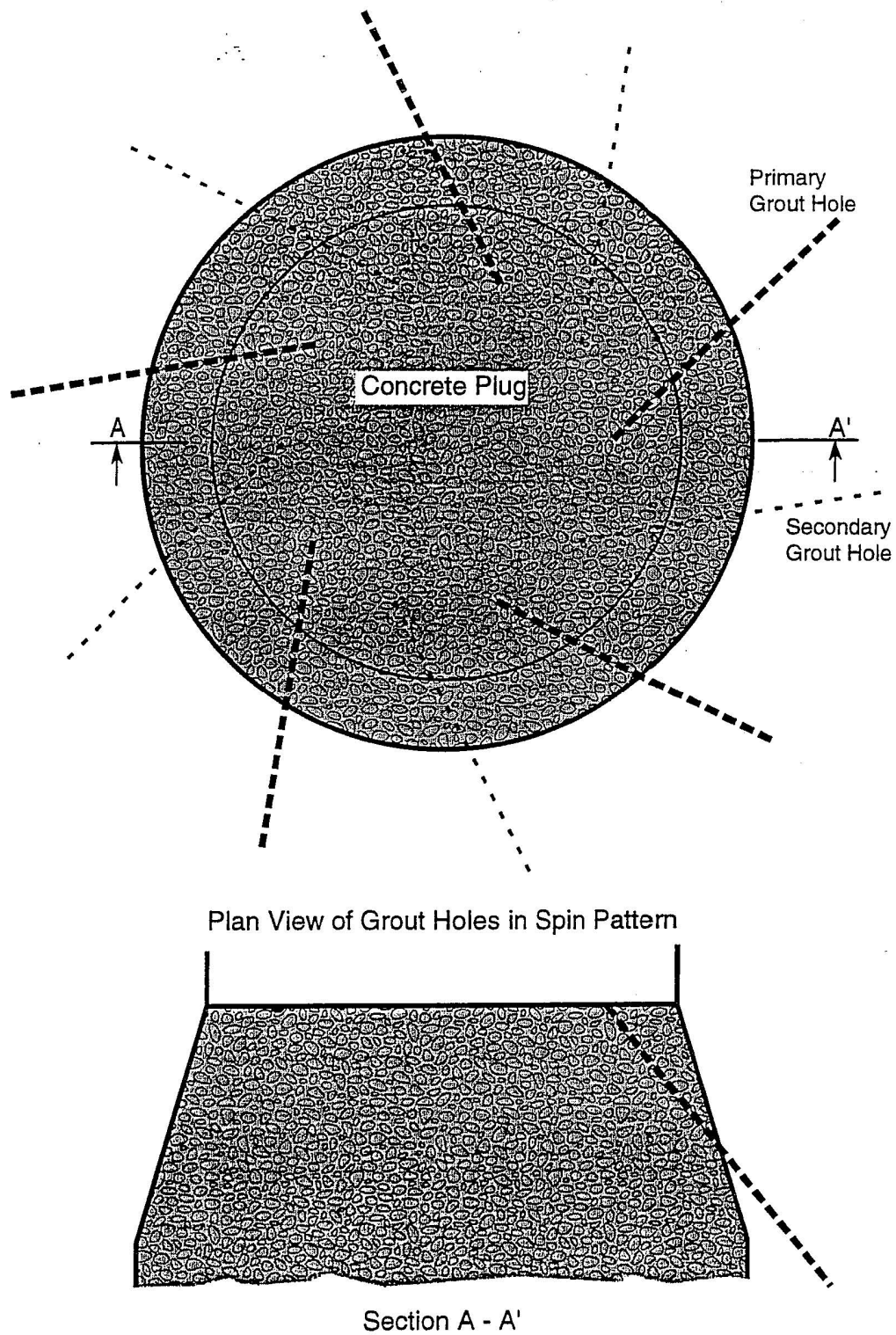




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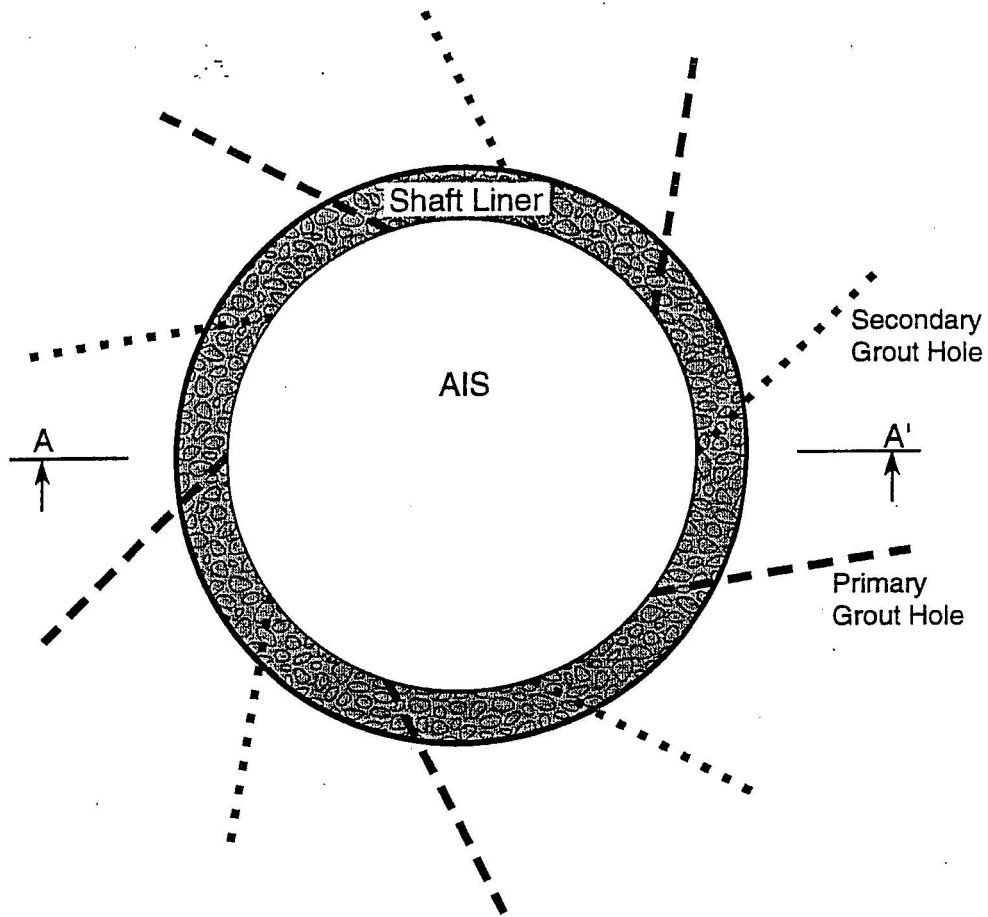
**Figure G2B-4**  
**Drop Pattern for 6-m-Diameter Shaft Using a 1.2-m-Diameter Tamper**





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**Figure G2B-5**  
**Plan and Section Views of Downward Spin Pattern of Grout Holes**



Plan View of Grout Holes in Spin Pattern



Section A - A'

TRI-6121-374-0

Figure G2B-6  
Plan and Section Views of Upward Spin Pattern of Grout Holes

**ATTACHMENT G2**  
**APPENDIX G2-E**  
**DESIGN DRAWINGS**  
**SHAFT SEALING SYSTEM**  
**COMPLIANCE SUBMITTAL DESIGN REPORT**

SAND96-1326/2  
Unlimited Release  
Printed August 1996

Distribution  
Category UC-721

**Waste Isolation Pilot Plant  
Shaft Sealing System  
Compliance Submittal Design Report**

**Volume 2 of 2:  
Appendix E**

Repository Isolation Systems Department  
Sandia National Laboratories  
Albuquerque, NM 87185

**ABSTRACT**

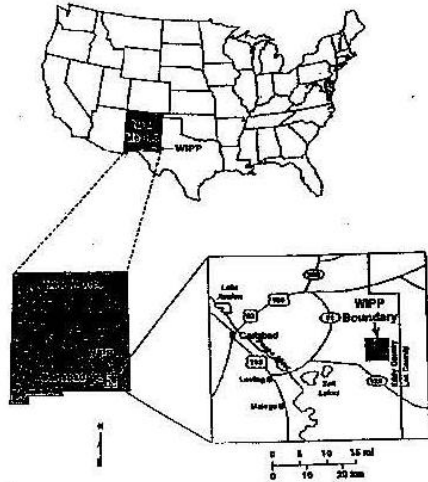
This is the second volume of a two-volume report describing a shaft sealing system design for the Waste Isolation Pilot Plant. This appendix contains detailed drawings of the shaft sealing system and its components.

WASTE ISOLATION PILOT PLANT

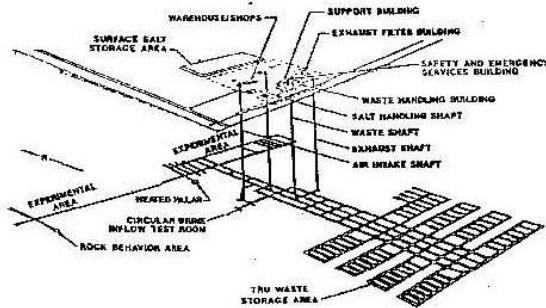
CARLSBAD, NM

SHAFT SEALING SYSTEM DESIGN

DESIGN DRAWINGS

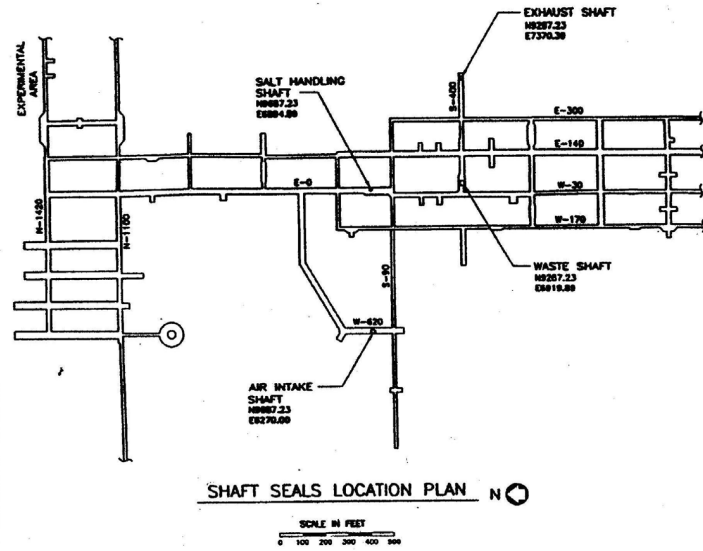


WIPP LAYOUT



DRAWING NUMBER	TITLE	DRAWING NUMBER	TITLE	DRAWING NUMBER	TITLE
SNL-007 1 OF 28	WIPP SHAFT SEALING SYSTEM SHAFT LOCATION PLAN, ABBREVIATIONS, GENERAL NOTES AND LEGEND	SNL-007 10 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION AIR INTAKE SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE	SNL-007 19 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS SALT HANDLING SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE
SNL-007 2 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS WASTE SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 13 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS AIR INTAKE SHAFT SHAFT STATION MONOLITH	SNL-007 20 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION SALT HANDLING SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE
SNL-007 3 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION WASTE SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 12 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS EXHAUST SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 21 OF 28	WIPP SHAFT SEALING SYSTEM SALT HANDLING SHAFT SHAFT STATION MONOLITH
SNL-007 4 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS WASTE SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE	SNL-007 13 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION EXHAUST SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 22 OF 28	WIPP SHAFT SEALING SYSTEM CONCRETE-ASPHALT WATERSTOP 7M SALADO FORMATION
SNL-007 5 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION WASTE SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE	SNL-007 14 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS EXHAUST SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE	SNL-007 23 OF 28	WIPP SHAFT SEALING SYSTEM ASPHALT COLUMN
SNL-007 6 OF 28	WIPP SHAFT SEALING SYSTEM WASTE SHAFT SHAFT STATION MONOLITH	SNL-007 15 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION EXHAUST SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE	SNL-007 24 OF 28	WIPP SHAFT SEALING SYSTEM UPPER AND LOWER SALADO COMPACTED CLAY COLLARS
SNL-007 7 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS AIR INTAKE SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 16 OF 28	WIPP SHAFT SEALING SYSTEM EXHAUST SHAFT SHAFT STATION MONOLITH	SNL-007 25 OF 28	WIPP SHAFT SEALING SYSTEM CONCRETE CLAY COLUMN
SNL-007 8 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION AIR INTAKE SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 17 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS SALT HANDLING SHAFT CONCRETE/CLAY & AS-BUILT ELEMENTS	SNL-007 26 OF 28	WIPP SHAFT SEALING SYSTEM CONCRETE FILL
SNL-007 9 OF 28	WIPP SHAFT SEALING SYSTEM NEAR-SURFACE/EXHAUST FORMATIONS AIR INTAKE SHAFT STRATIGRAPHY & SEALING SUBSYSTEM PROFILE	SNL-007 18 OF 28	WIPP SHAFT SEALING SYSTEM SALADO FORMATION SALT HANDLING SHAFT STRATIGRAPHY & AS-BUILT ELEMENTS	SNL-007 28 OF 28	WIPP SHAFT SEALING SYSTEM COMPACTED EARTHEN FILL AND CONCRETE FILL

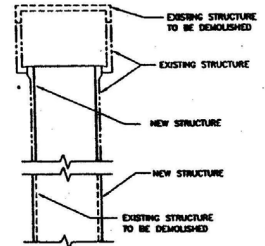
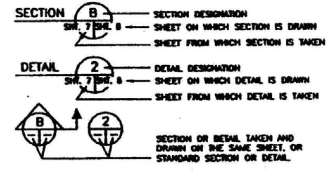




**GENERAL NOTES:**

1. THE GRID NUMBERING SYSTEM (E-300, S-400, ETC.) IS BASED ON THE DIRECTION AND NORMAL DISTANCE IN FEET THE GRID IS FROM THE SALT HANDLING SHAFT'S DESIGNATED CENTERLINE LOCATION OF E-300. E-300, THE WIPP PLANT COORDINATE SYSTEM CENTERLINE LOCATION FOR THE SALT HANDLING SHAFT IS H0887.23, AND E0884.88. THE PLANT COORDINATE SYSTEM IS DESCRIBED IN WESTINGHOUSE DRAWING NO. 51-W-100-W, UNDERGROUND EXCAVATIONS, ISSUED 4/15/92.
2. THE AS-BUILT DIMENSIONS AND DEPTHS AND/OR ELEVATIONS SHOWN IN THESE DRAWINGS ARE NOMINAL. IN TIME DIMENSIONS MAY CHANGE DUE TO LOCAL VARIANCE OF THE SUBSTRATUM, OPERATIONAL MODIFICATIONS MADE TO SUIT THE CREEP CLOSURE OF THE SHAFT, AND OTHER OPERATIONAL REQUIREMENTS. THEREFORE THE AS-BUILT DIMENSIONS AND THE PERTINENT ELEVATIONS FOR SETTING THE SEALING SYSTEM SHALL BE VERIFIED BY FIELD SURVEYING AND EXPLORATORY CORE DRILLING DURING SITE PREPARATION FOR THE FINAL CONSTRUCTION.
3. DRAWING NUMBERS:  
 FOR CLARITY ON DETAIL AND SECTION DESIGNATIONS, AND NOTES, ONLY THE SHEET NUMBER IS SHOWN.

**LEGEND FOR PROPOSED SHAFT SEALING SYSTEM:**



**ABBREVIATIONS:**

- C CENTERLINE
- APP. APPROXIMATE
- CMP CORRUGATED METAL PLATE
- CONC. CONCRETE
- DOE DEPARTMENT OF ENERGY
- DRG. DRAWING
- E EAST
- EL. ELEVATION
- EXIST. EXISTING
- FT. FOOT, FEET
- HT. HEIGHT
- I.D. INSIDE DIAMETER
- IN. INCHES
- MB MARKER BED
- MRL MINIMUM
- MSL MEAN SEA LEVEL
- N NORTH
- NO. NUMBER
- R RADII
- S SOUTH
- SHT. SHEET NUMBER
- S/C SALADO MASS CONCRETE
- TYP. TYPICAL
- USGS UNITED STATES GEOLOGICAL SURVEY
- W WEST
- WBI WESTINGHOUSE WASTE ISOLATION DIVISION
- WPP WASTE ISOLATION PILOT PLANT

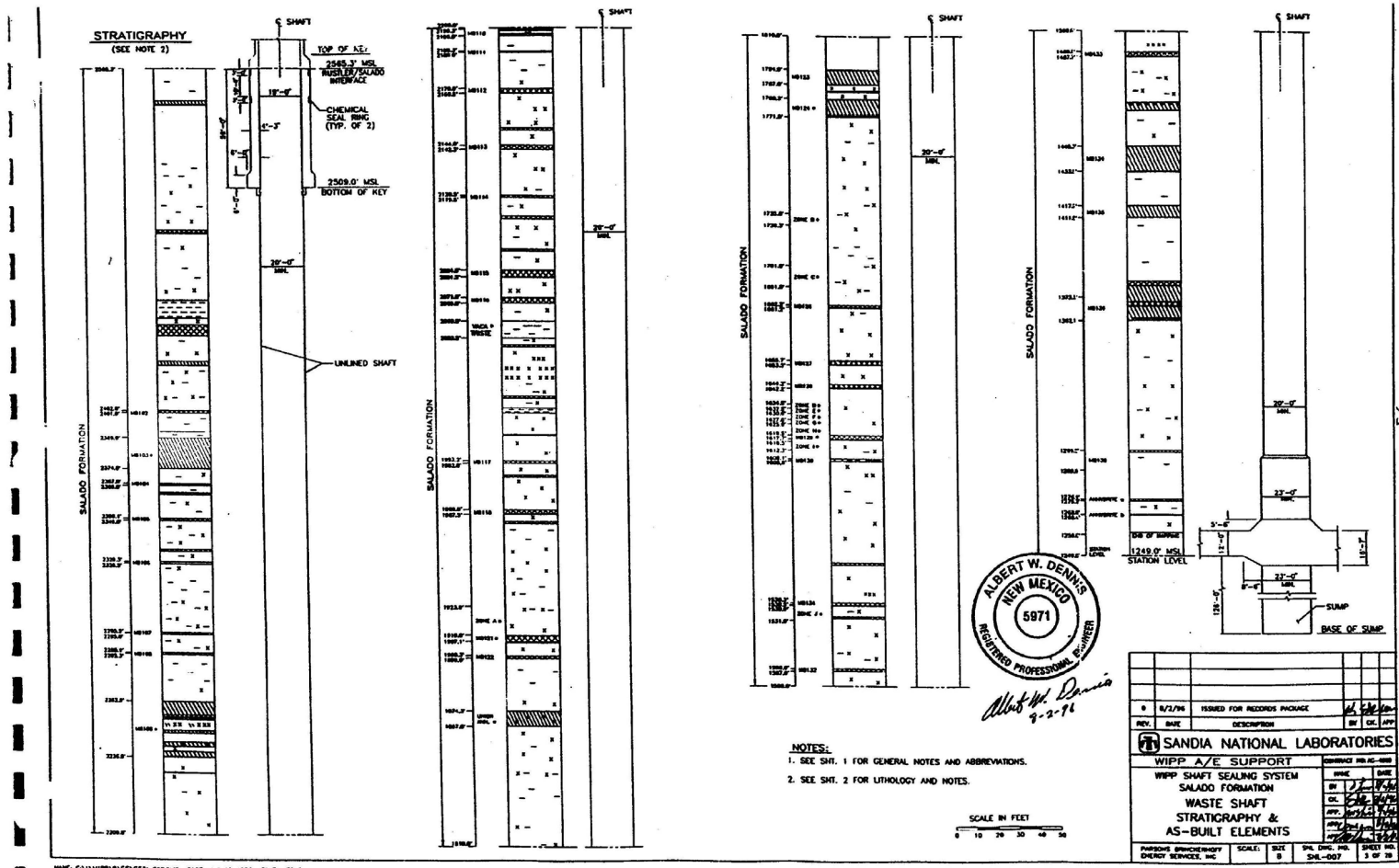


*Albert W. Dennis*  
 9-2-96

REV.	DATE	DESCRIPTION	BY	CHK.
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<b>SANDIA NATIONAL LABORATORIES</b> WIPP A/E SUPPORT WIPP SHAFT SEALING SYSTEM SHAFT LOCATION PLAN, ABBREVIATIONS, GENERAL NOTES AND LEGEND				
PROJECT: SANDIA NATIONAL LABORATORIES DRAWING NO.: 304-097			SCALE: 1" = 100'	SHEET NO.: 1 OF 28

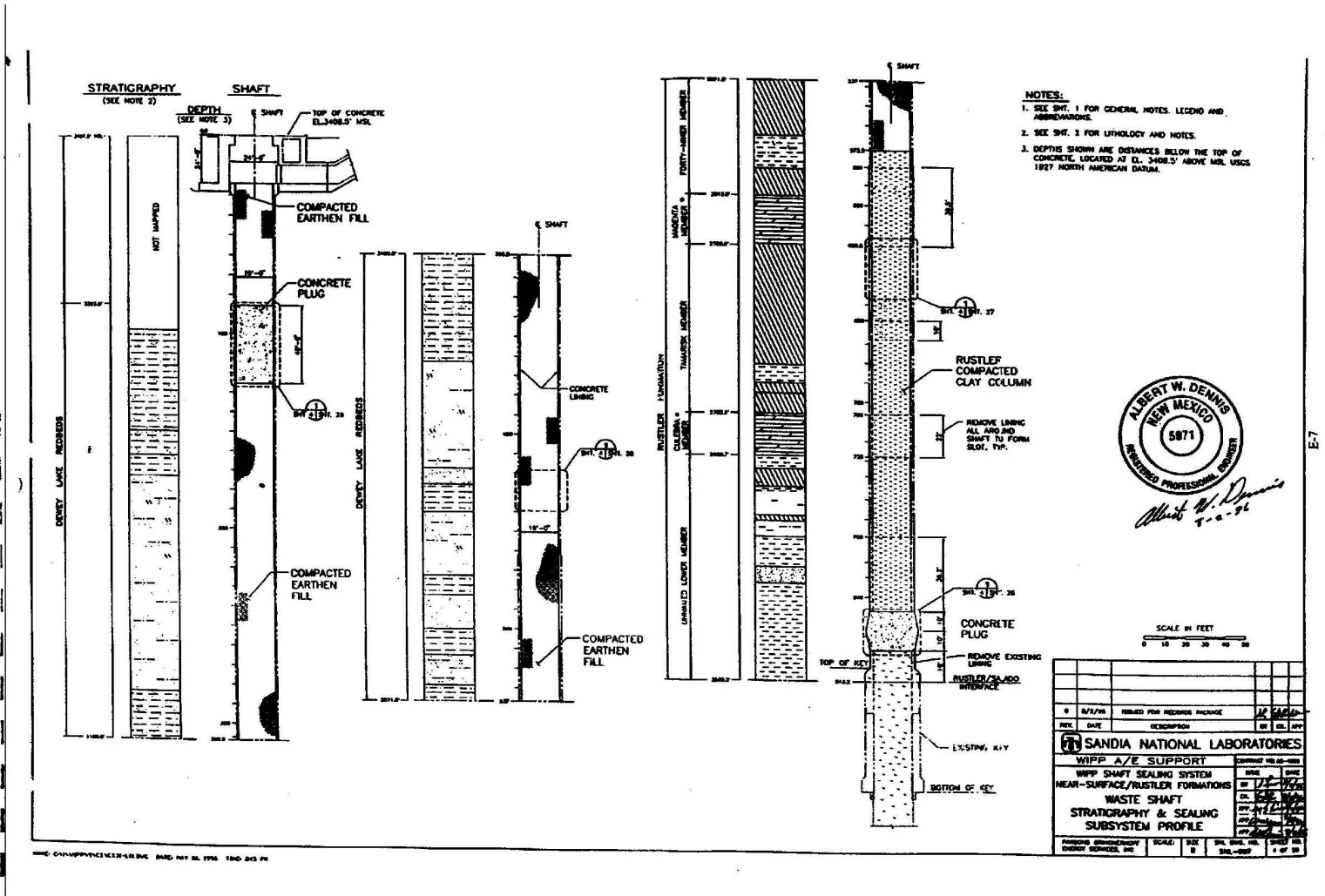
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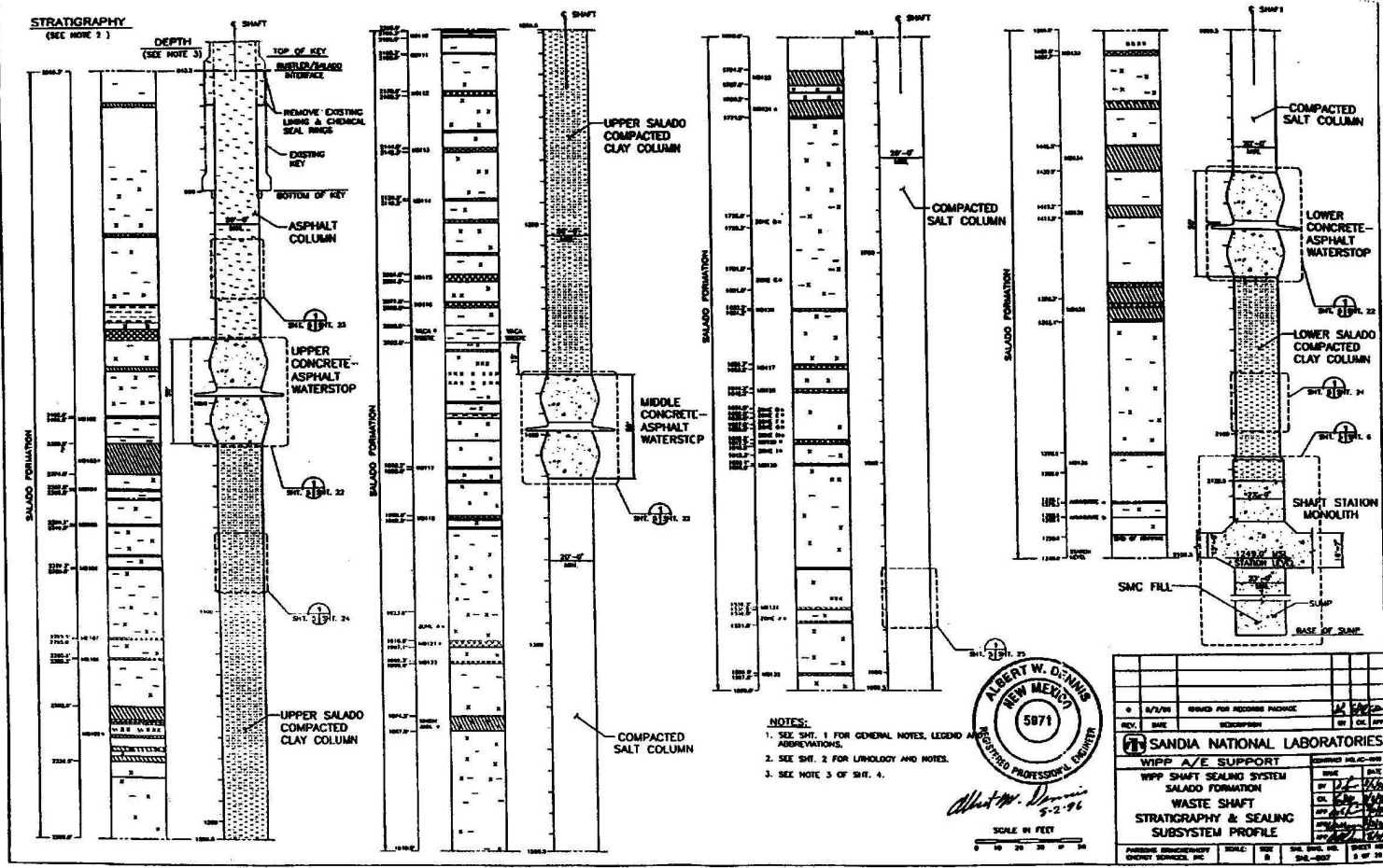


Salado Formation Waste Shaft Stratigraphy and AS-Built Elements



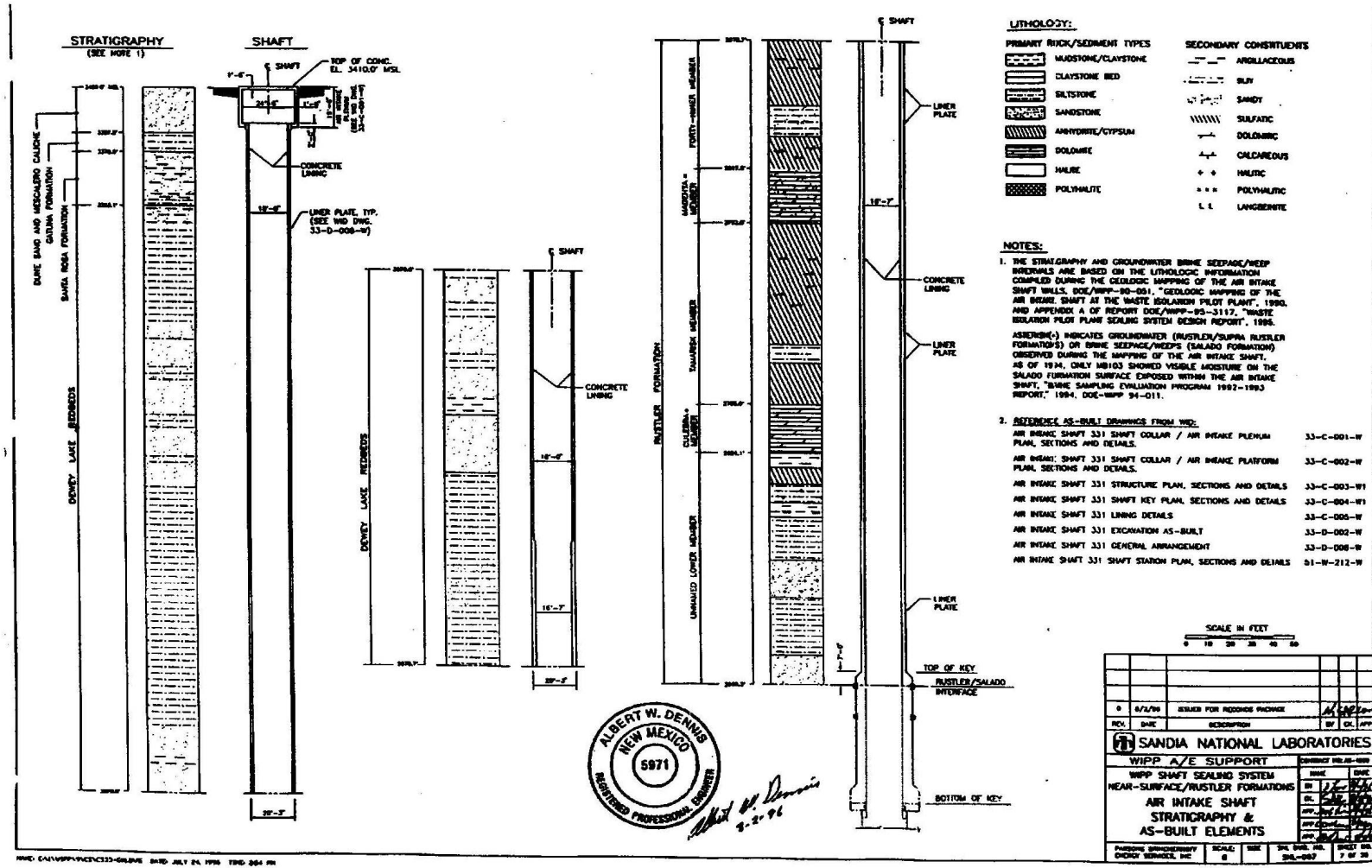


Near-Surface/Rustler Formations Waste Shaft Stratigraphy and Sealing Subsystem Profile



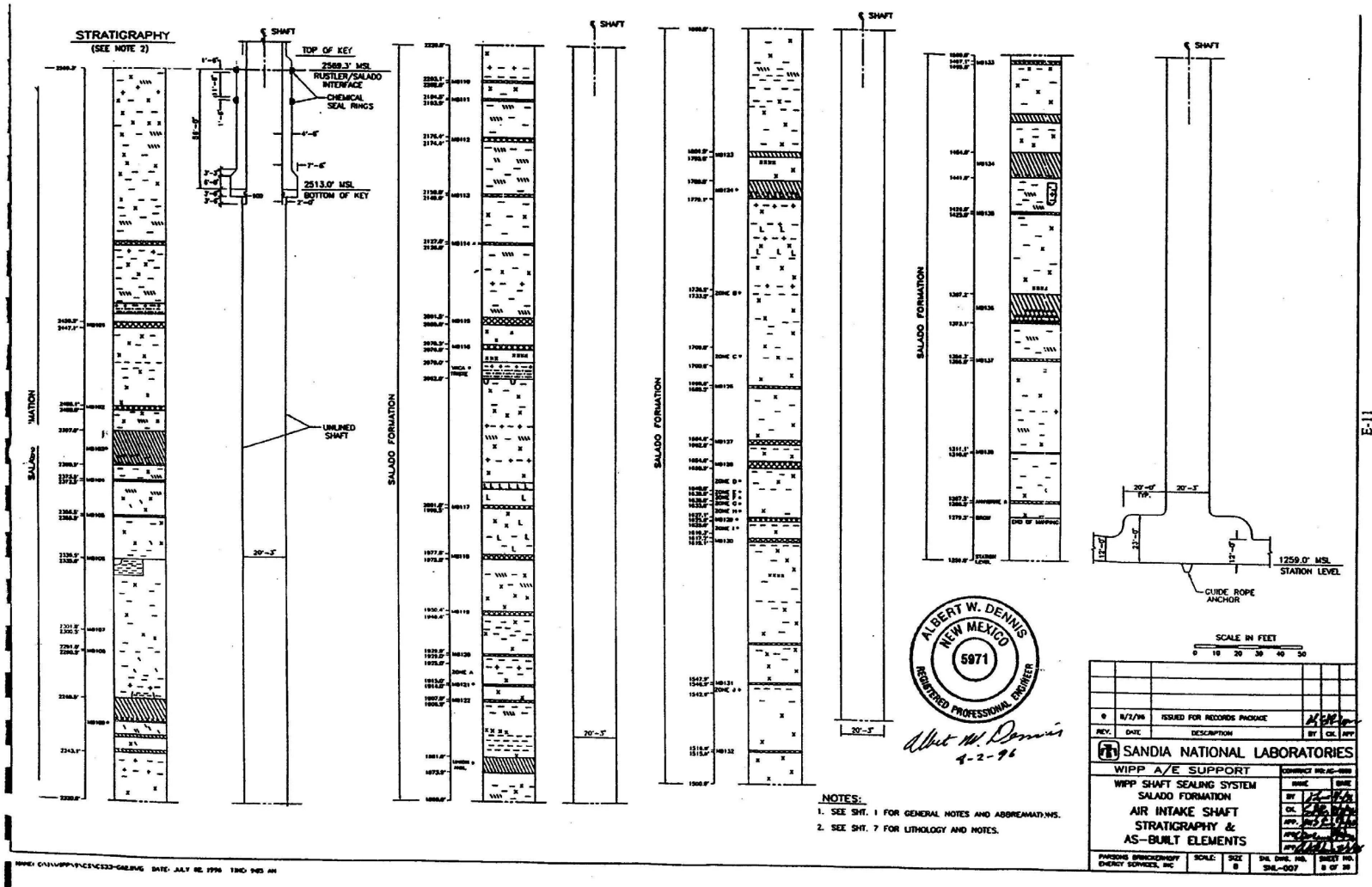
Salado Formation Waste Shaft Stratigraphy and Sealing Subsystem Profile



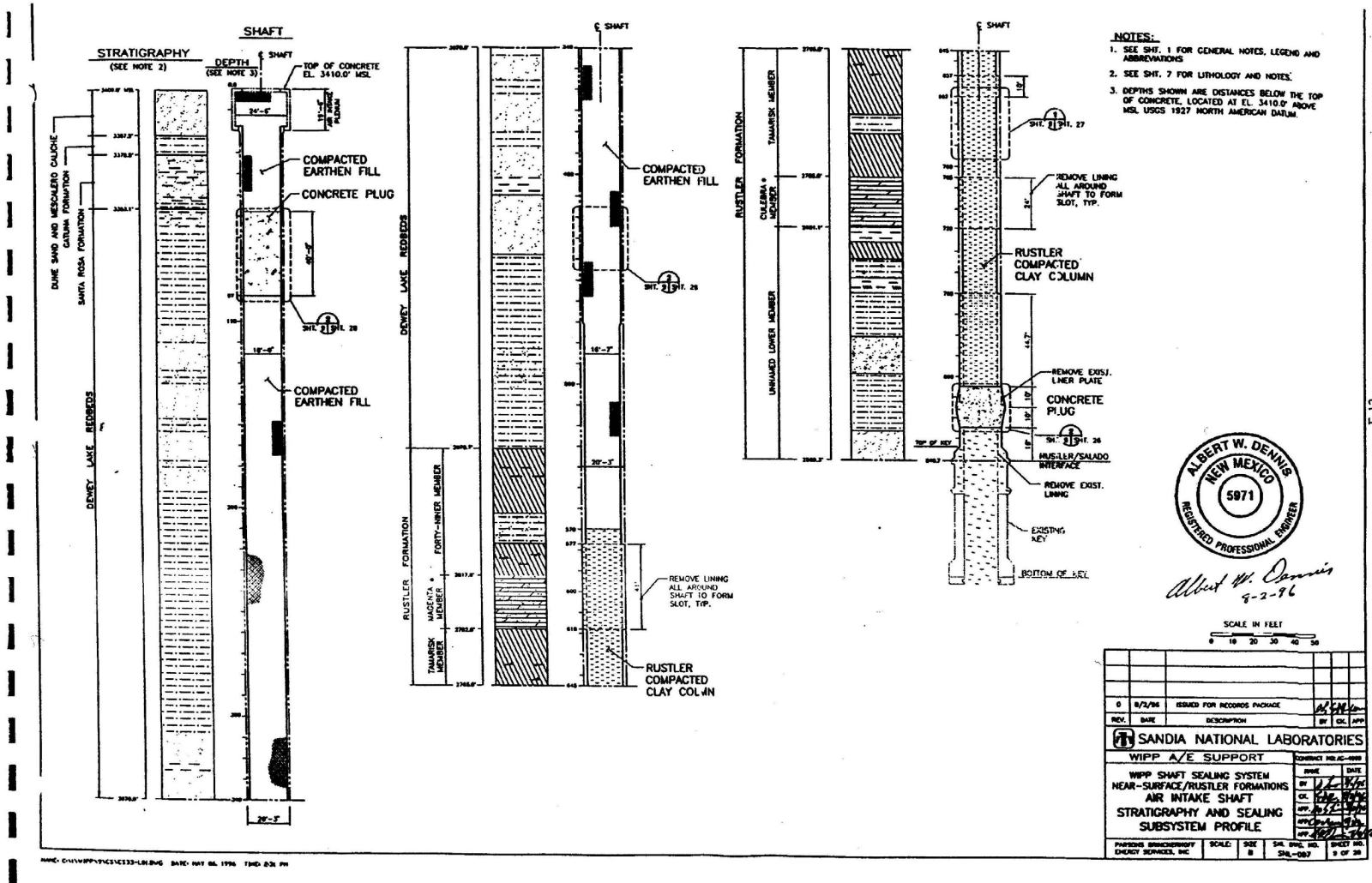


Near-Surface / Rustler Formations Air Intake Shaft Stratigraphy and AS-Built Elements

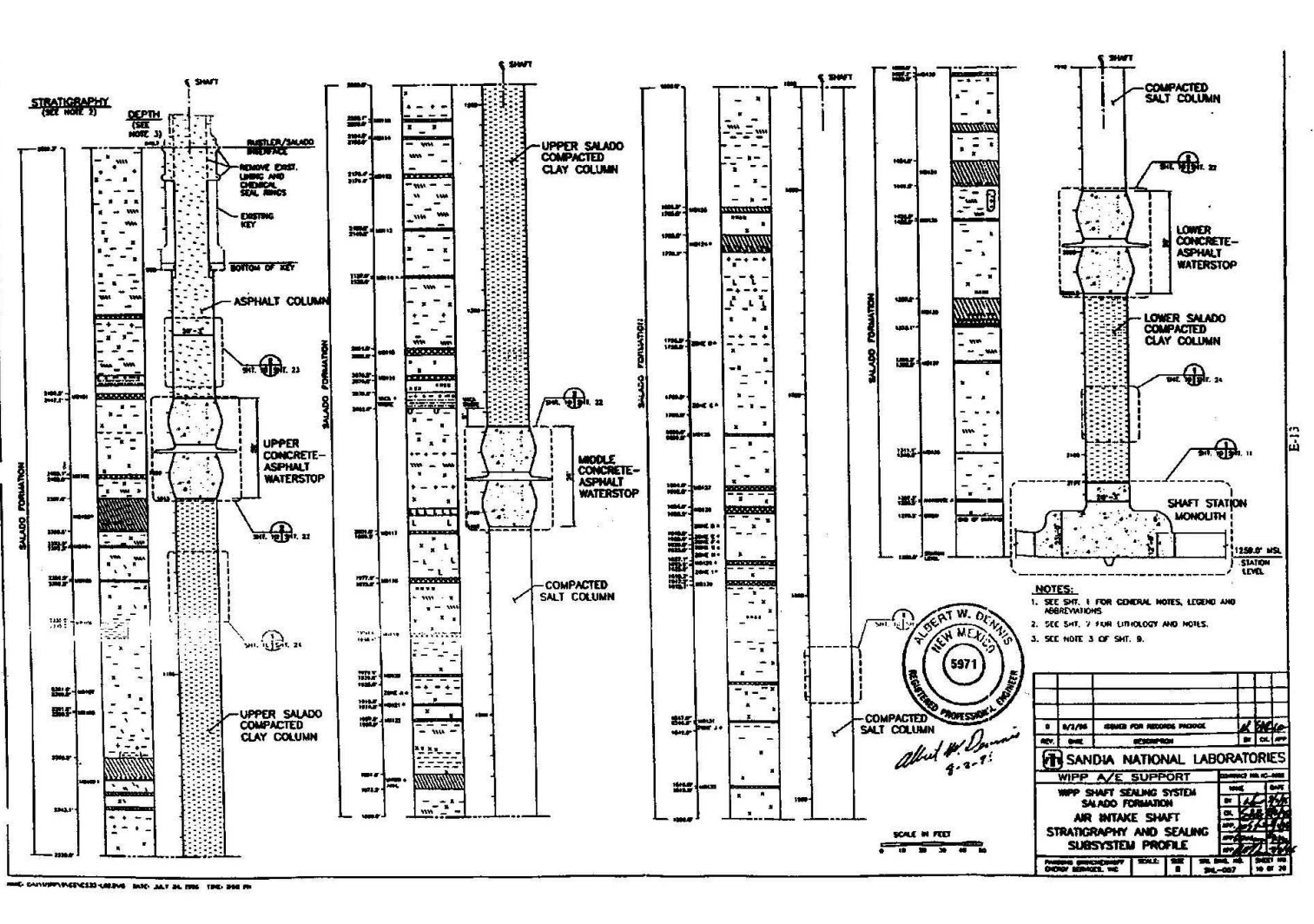




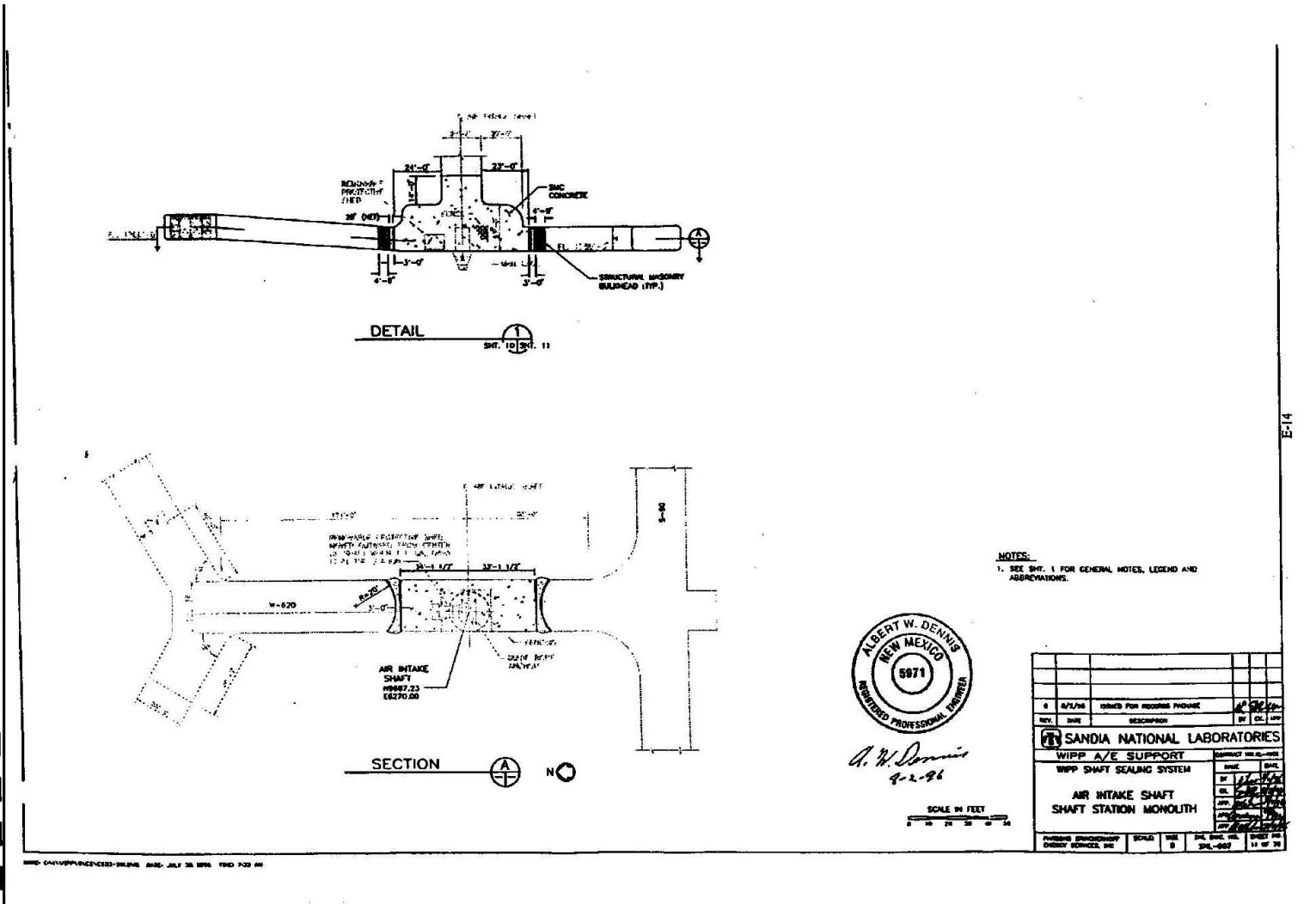
Salado Formation Air Intake Shaft Stratigraphy and AS-Built Elements



Near-Surface / Rustler Formations Air Intake Shaft Stratigraphy and Sealing Subsystem Profile



Salado Formation Air Intake Shaft Stratigraphy and Sealing Subsystem Profile



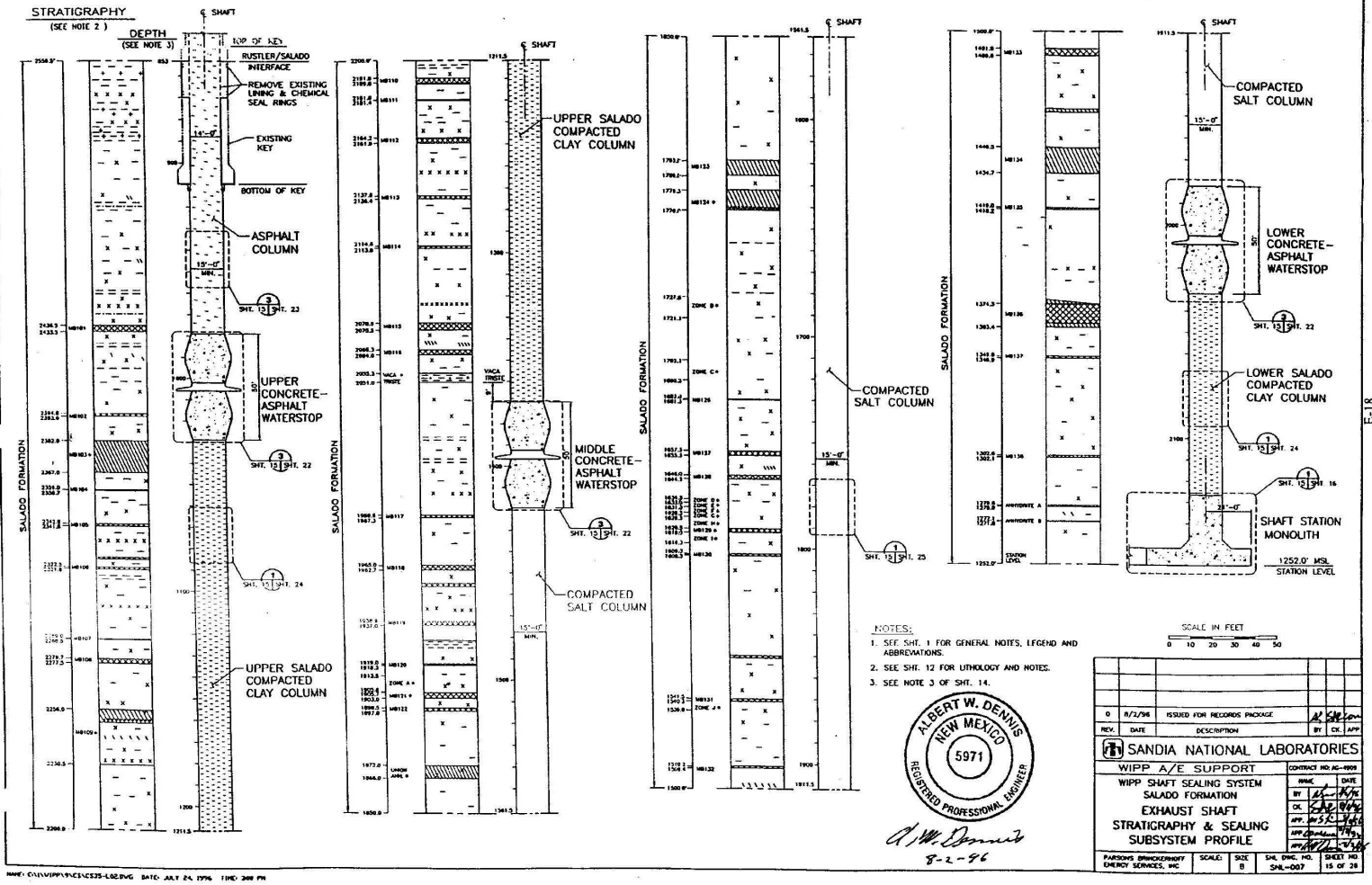
Air Intake Shaft Station Monolith





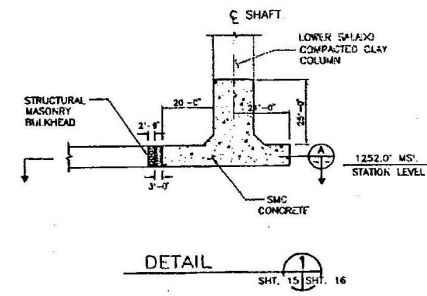
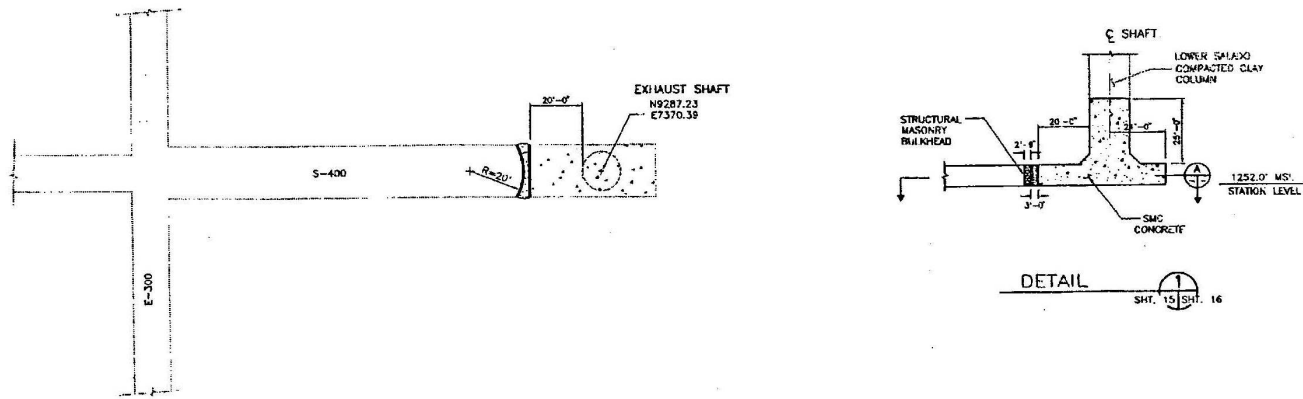




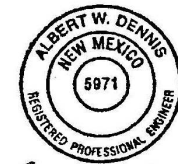
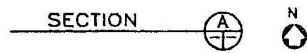


Salado Formation Exhaust Shaft Stratigraphy and Sealing Subsystem Profile





**NOTES:**  
 1. SEE SHT. 1 FOR GENERAL NOTES, LEGEND AND ABBREVIATIONS.

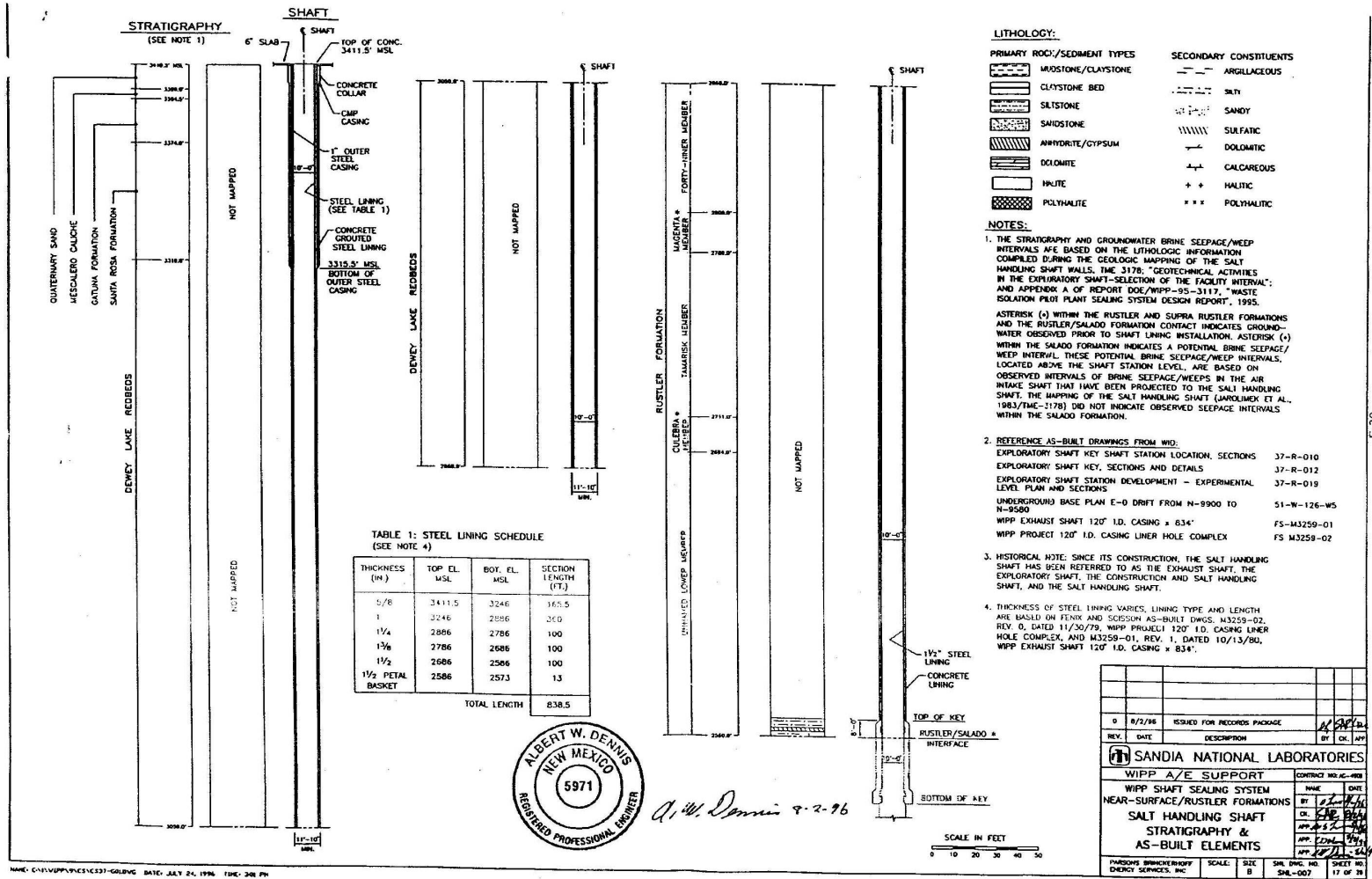


*A. W. Dennis 8-2-86*

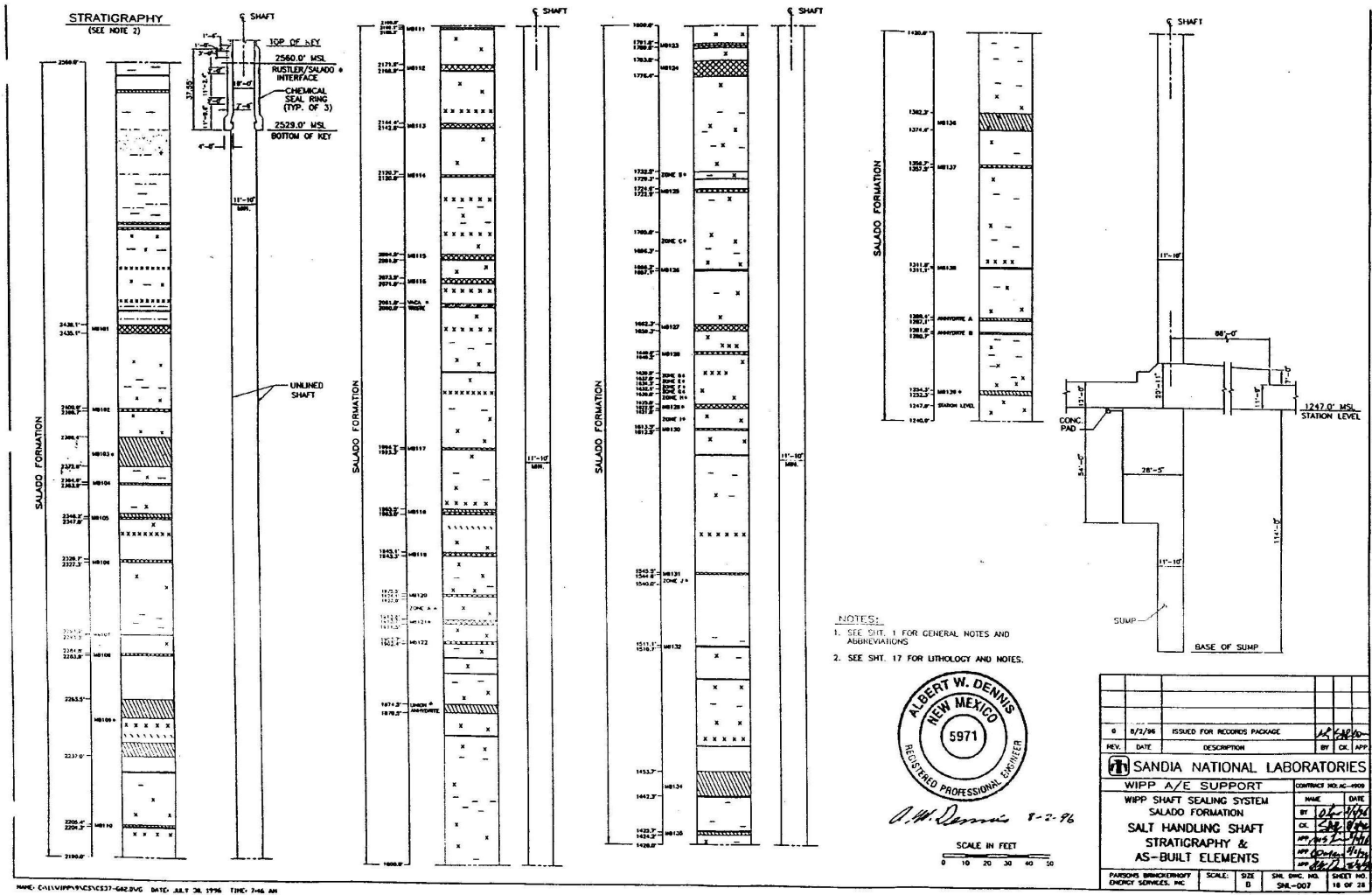
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				DATE	DATE
				BY	DATE

1-19

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-E  
 November 30, 2010/December 2022 Renewal Draft Permit



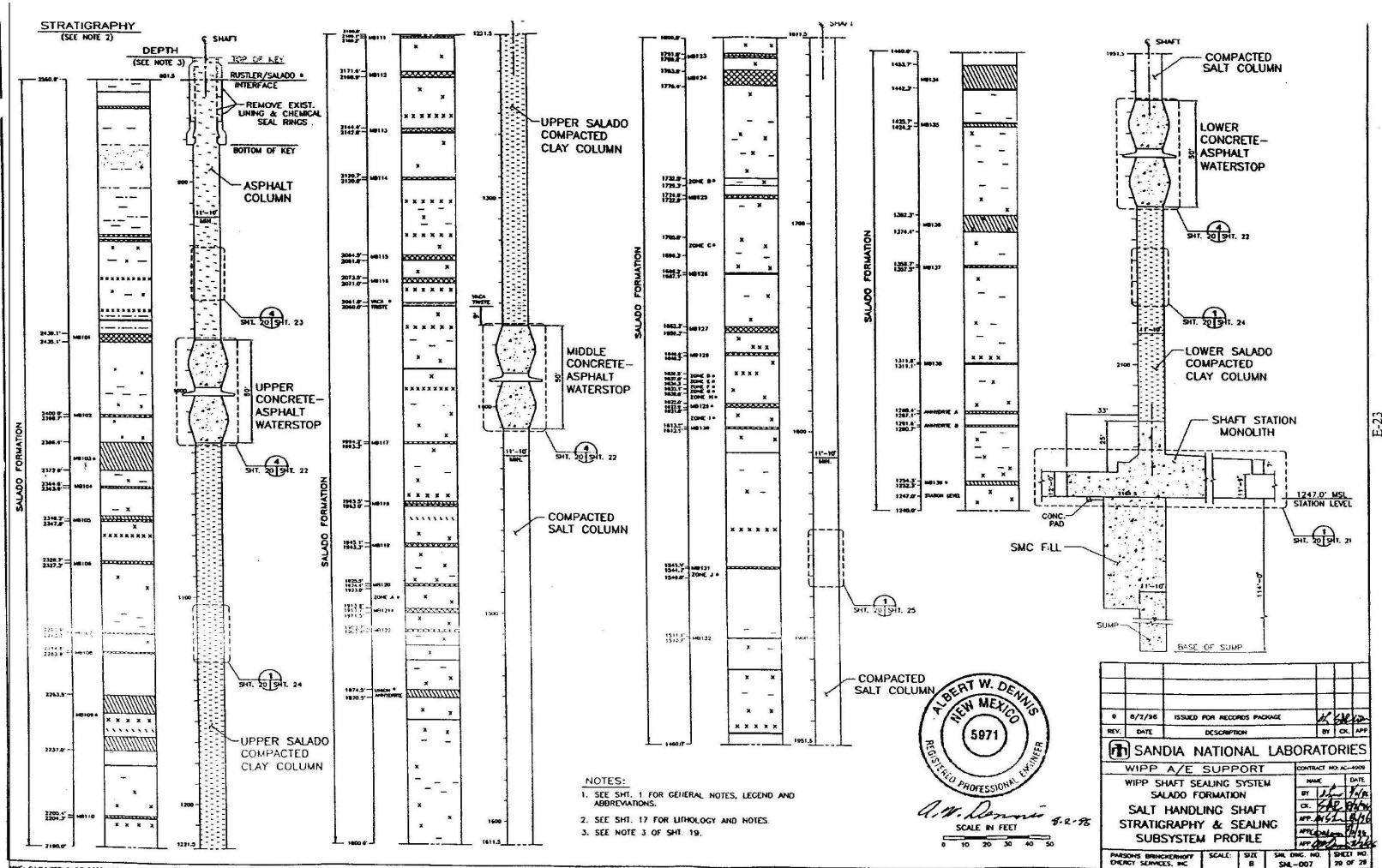
Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-E  
 November 30, 2010 December 2022 Renewal Draft Permit



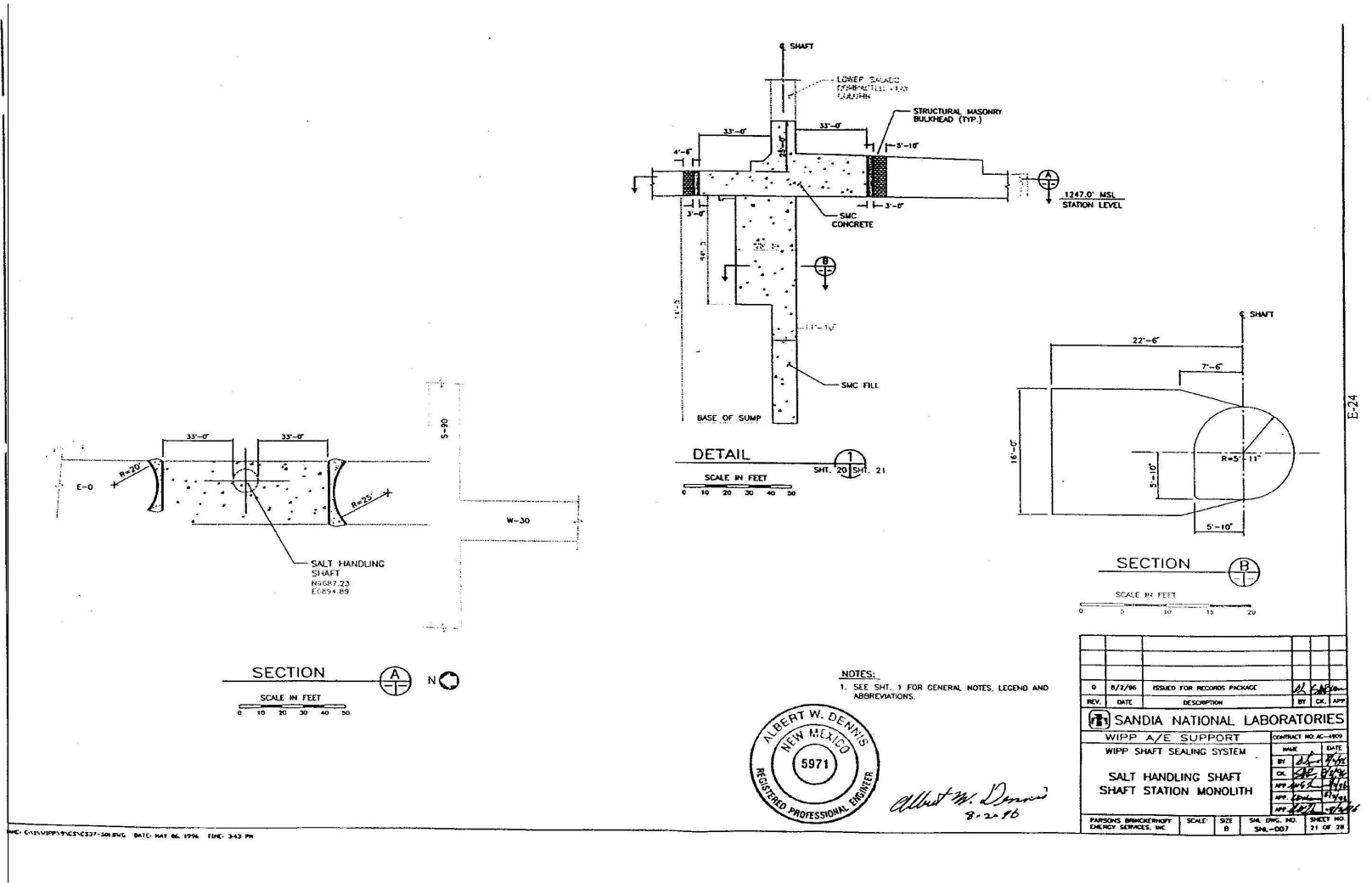
Salado Formation Salt Handling Shaft Stratigraphy and AS-Built Elements





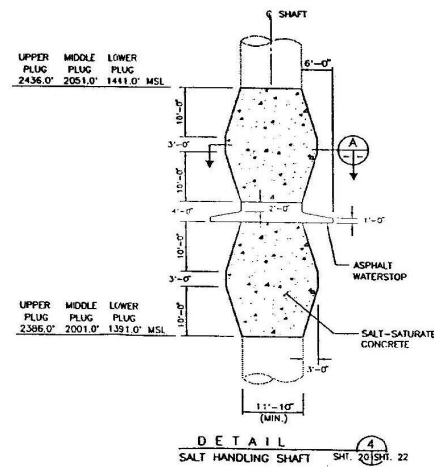
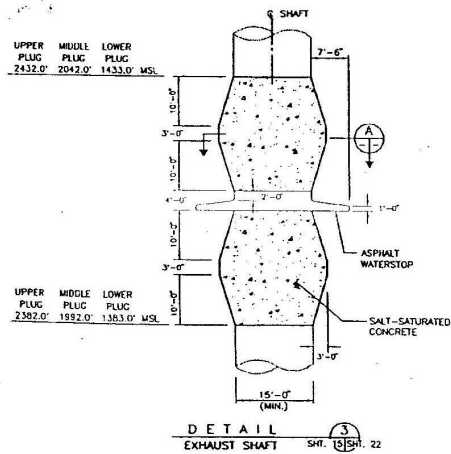
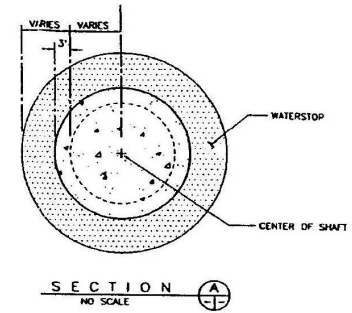
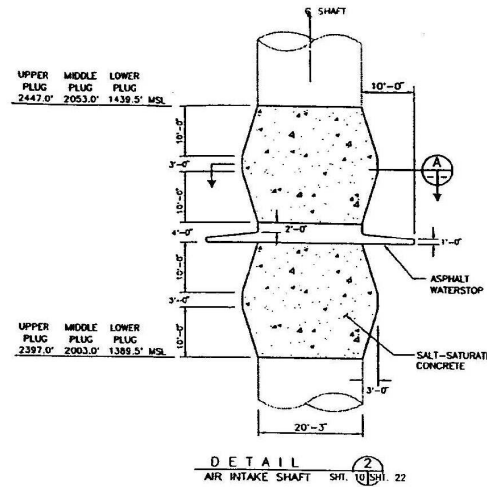
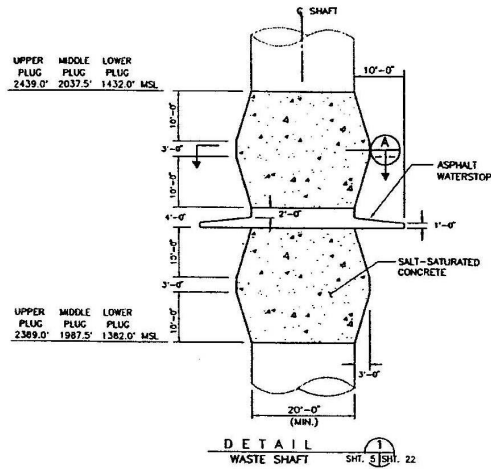


Salado Formation Salt Handling Shaft Stratigraphy and Sealing Subsystem Profile



Salt Handling Shaft Shaft Station Monolith

Sheet 21 of 28



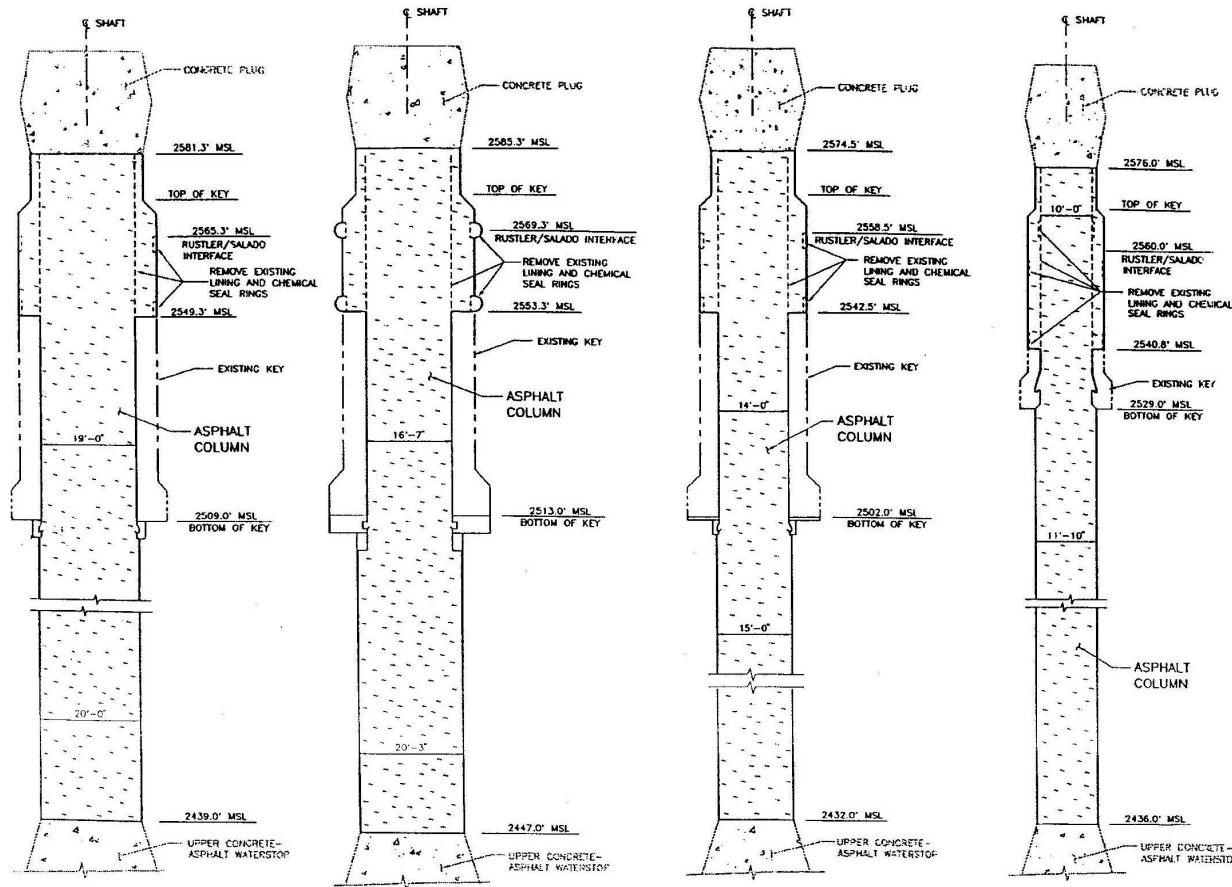
*Albert W. Dennis*  
 1-2-96

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PARSONS BRINCKERHOFF ENERGY SERVICES, INC.		SCALE: 8	SHEET NO: 22	SHEET NO: 28



Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-E  
 November 30, 2010 December 2022 Renewal Draft Permit



DETAIL 1  
 WASTE SHAFT  
 SH. 5 | SH. 23

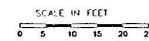
DETAIL 2  
 AIR INTAKE SHAFT  
 SH. 10 | SH. 23

DETAIL 3  
 EXHAUST SHAFT  
 SH. 15 | SH. 23

DETAIL 4  
 SALT HANDLING SHAFT  
 SH. 20 | SH. 23



*Albert W. Dennis*  
 8-2-96



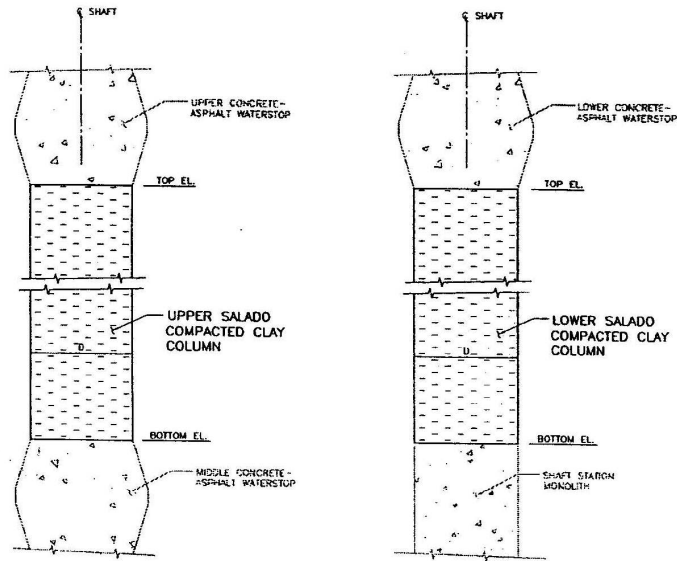
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WIPP A/E SUPPORT			CONTRACT NO. AC-0009		
WIPP SHAFT SEALING SYSTEM					
ASPHALT COLUMN					
PARSONS BRINCKERHOFF ENERGY SERVICES, INC.		SCALE: 1/8" = 1'-0"	SN. DWG. NO. SHL-007	SHEET NO. 23 OF 28	

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Asphalt Column

Sheet 23 of 28

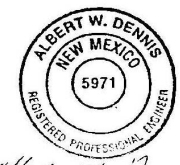
Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-E  
 November 30, 2010 December 2022 Renewal Draft Permit



DETAIL  
 SEE TABLE 1 FOR DETAILS  
 NO SCALE  
 SHT. 5 | SHT. 24  
 SHT. 10  
 SHT. 15  
 SHT. 20

TABLE 1

SHAFT	NOMINAL SHAFT DIAMETER D	UPPER SALADO COMPACTED CLAY COLUMN			LOWER SALADO COMPACTED CLAY COLUMN		
		TOP EL. (FT. MSL)	BOTTOM EL. (FT. MSL)	TOTAL HT. (FT.)	TOP EL. (FT. MSL)	BOTTOM EL. (FT. MSL)	TOTAL HT. (FT.)
WASTE	20'-0"	2389.0	2037.5	351.5	1382.0	1286.0	96.0
AIR INTAKE	20'-3"	2397.0	2053.0	344.0	1389.5	1296.0	93.5
EXHAUST	15'-0"	2382.0	2042.0	340.0	1383.0	1285.0	98.0
SALT HANDLING	11'-10"	2386.0	2051.0	335.0	1391.0	1284.0	107.0



*Albert W. Dennis*  
 9-2-96

REV.	DATE	DESCRIPTION	BY	CHK.	APP.
0	11/2/96	ISSUED FOR RECORDS PACKAGE	JL	SKL	
<b>SANDIA NATIONAL LABORATORIES</b> WIPP A/E SUPPORT WIPP SHAFT SEALING SYSTEM UPPER AND LOWER SALADO COMPACTED CLAY COLUMNS					
NAME		DATE			
BY		DATE			
CK.		DATE			
APP.		DATE			
APP.		DATE			
PARSONS BRINCKERHOFF ENERGY SERVICES, INC.	SCALE:	SIZE:	SPL. DWG. NO.:	SHEET NO.:	
	0	D	SML-007	24 OF 28	

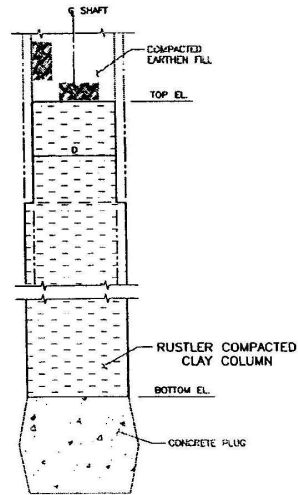
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**WIPP Shaft Sealing System Concrete Plug**

Drawing SNL 007 26 of 28 not currently available. Drawing is not displayed in the Permit.



DETAIL  
 SEE TABLE 1 FOR DETAILS  
 NO SCALE

SH. 4	SH. 27
SH. 6	
SH. 14	
SH. 19	

TABLE 1

SHAFT	NOMINAL SHAFT DIAMETER D	RUSTLER COMPACTED CLAY COLUMN		
		TOP EL. (FT. MSL)	BOTTOM EL. (FT. MSL)	TOTAL HT. (FT.)
WASTE	19'-0"	2836.0	2801.3	234.7
AIR INTAKE	16'-7"	2840.0	2805.3	234.7
EXHAUST	14'-0"	2829.0	2594.5	234.5
SALT HANDLING	10'-0"	2830.0	2596.0	234.0

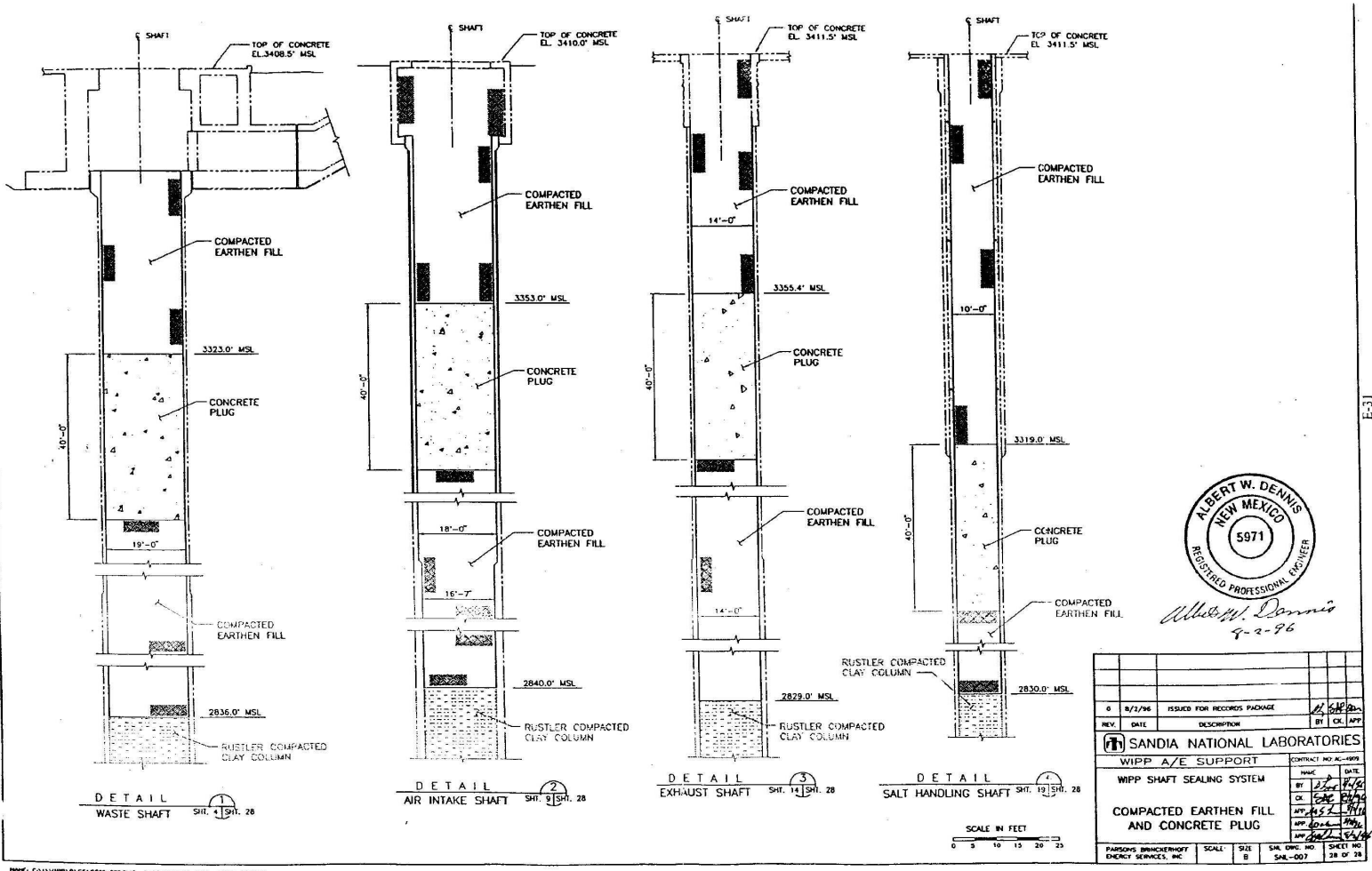


*Albert W. Dennis*  
 7-2-96

REV.	DATE	DESCRIPTION	BY	CHK.	APP.
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NAME		DATE			
BY		DATE			
CHK.		DATE			
APP.		DATE			
DATE		DATE			
PARSONS BRINCKERHOFF ENERGY SERVICES, INC.    SCALE: SIZE B    S&L ENG. NO. S&L-007    SHEET NO. 27 OF 28					

WIP: ENVIRONMENTAL/SHAFT SEALING DATE: MAY 06, 1996 TIME: 04:17 PM

E-30



ALBERT W. DENNIS  
 NEW MEXICO  
 5971  
 REGISTERED PROFESSIONAL ENGINEER  
*Albert W. Dennis*  
 9-2-96

0	8/1/96	ISSUED FOR RECORDS PACKAGE	BY: <i>SP</i>
REV.	DATE	DESCRIPTION	BY: <i>OK, APP</i>
<b>SANDIA NATIONAL LABORATORIES</b>			
WIPP A/E SUPPORT		CONTRACT NO. W-1099	
WIPP SHAFT SEALING SYSTEM		NAME:	DATE:
COMPACTED EARTHEN FILL AND CONCRETE PLUG		BY:	DATE:
PARSONS BRINCKERHOFF ENERGY SERVICES, INC.		SCALE:	SHEET NO. 28 OF 28

Compacted Earthen Fill and Concrete Plug

Sheet 28 of 28

WASTE ISOLATION PILOT PLANT  
CARLSBAD, NM  
SHAFT SEALING SYSTEM DESIGN  
EQUIPMENT AND CONSTRUCTION SKETCHES

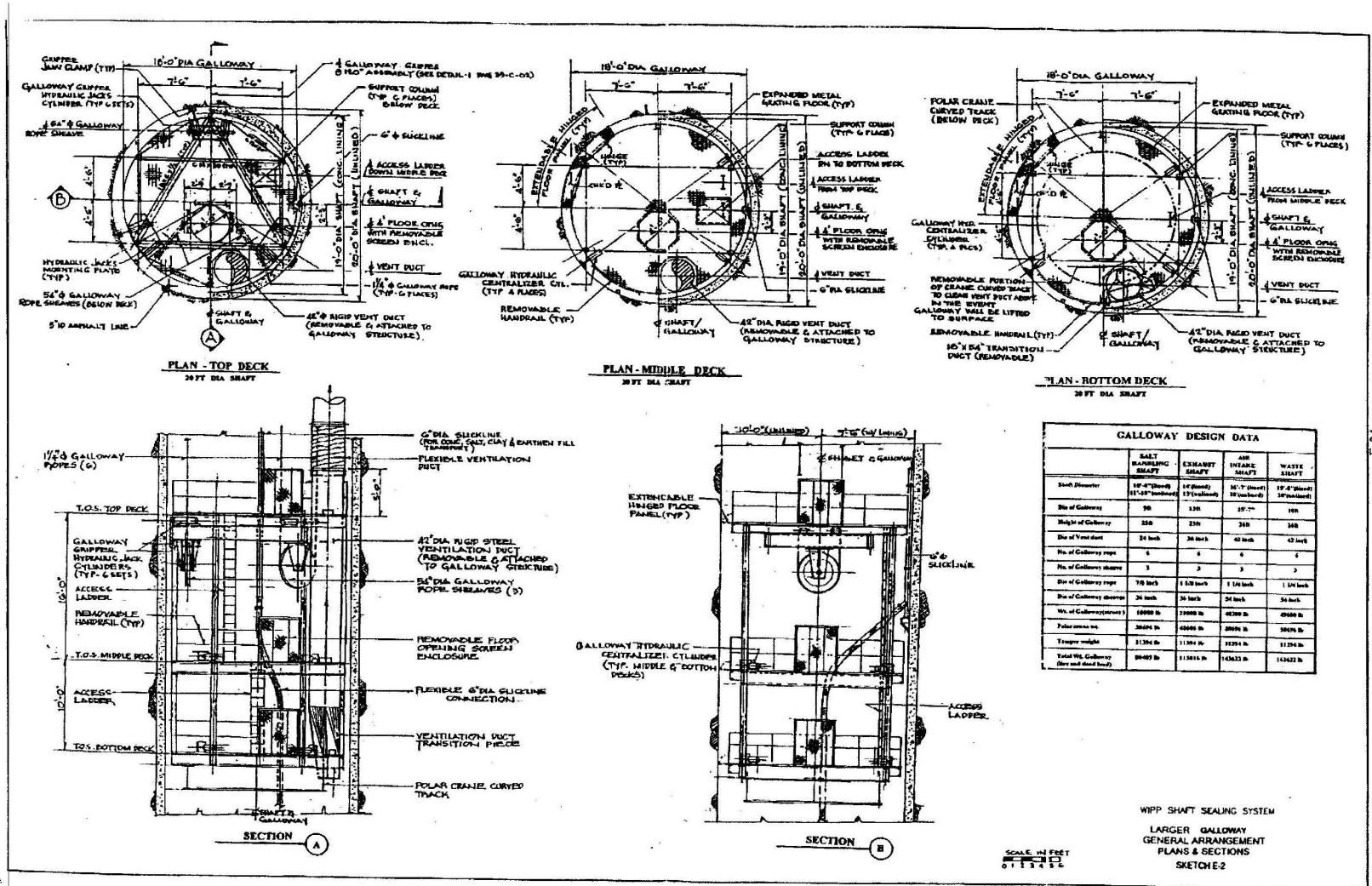
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SKETCH E-2	WIPP SHAFT SEALING SYSTEM LARGER GALLOWAY GENERAL ARRANGEMENT PLANS AND SECTIONS
SKETCH E-3	WIPP SHAFT SEALING SYSTEM TYPICAL HEADFRAME PLANS AND SECTIONS
SKETCH E-4	WIPP SHAFT SEALING SYSTEM PERSPECTIVE HEADFRAME AND ASSOCIATED SURFACE FACILITIES

E-32

List of Sketches



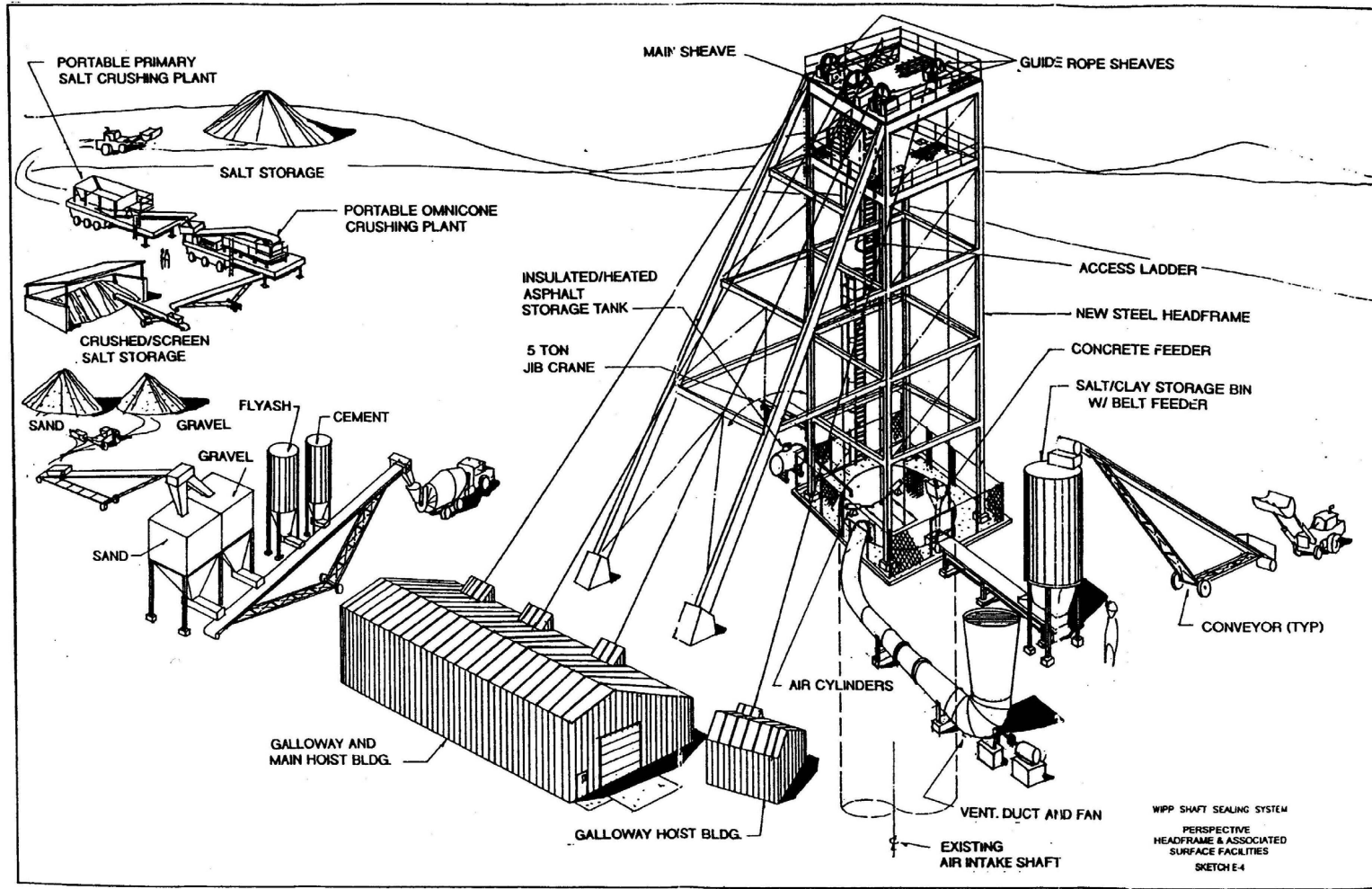




WIPP Shaft Sealing System Larger Galloway General Arrangement Plans and Sections







E-36

WIPP Shaft Sealing System Typical Headframe and Associated Surface Facilities

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-E  
 November 30, 2010 December 2022 Renewal Draft Permit

WIPP  
 UC721 Distribution List

Federal Agencies

US Department of Energy (4)  
 Office of Civilian Radioactive Waste Mgmt.  
 Attn: Deputy Director, RW-2  
 Acting Director, RW-10  
 Office of Human Resources & Admin.  
 Director, RW-30  
 Office of Program Mgmt. & Integ.  
 Director, RW-40  
 Office of Waste Accept., Stor., & Tran.  
 Forrestal Building  
 Washington, DC 20585

Attn: Project Director (2)  
 Yucca Mountain Site Characterization Office  
 Director, RW-3  
 Office of Quality Assurance  
 101 Convention Center Drive, Suite #P-110  
 Las Vegas, NV 89109

US Department of Energy  
 Albuquerque Operations Office  
 Attn: National Atomic Museum Library  
 P.O. Box 5400  
 Albuquerque, NM 87185-5400

US Department of Energy  
 Research & Waste Management Division  
 Attn: Director  
 P.O. Box E  
 Oak Ridge, TN 37831

US Department of Energy (8)  
 Carlsbad Area Office  
 Attn: G. Dials  
 D. Galbraith (3)  
 M. Matthews  
 M. McFadden  
 R. Lark  
 J. A. Mewhinney  
 P.O. Box 3090  
 Carlsbad, NM 88221-3090

US Department of Energy  
 Office of Environmental Restoration and  
 Waste Management  
 Attn: J. Lytle, EM-30  
 Forrestal Building  
 Washington, DC 20585-0002

US Department of Energy (3)  
 Office of Environmental Restoration and  
 Waste Management  
 Attn: M. Frei, EM-34, Trevion II  
 Washington, DC 20585-0002

US Department of Energy  
 Office of Environmental Restoration and  
 Waste Management  
 Attn: S. Schneider, EM-342, Trevion II  
 Washington, DC 20585-0002

US Department of Energy (2)  
 Office of Environment, Safety & Health  
 Attn: C. Borgstrom, EH-25  
 R. Pelletier, EH-231  
 Washington, DC 20585

US Department of Energy (2)  
 Idaho Operations Office  
 Fuel Processing & Waste Mgmt. Division  
 785 DOE Place  
 Idaho Falls, ID 83402

US Environmental Protection Agency (2)  
 Radiation Protection Programs  
 Attn: M. Oge  
 ANR-460  
 Washington, DC 20460

Boards

Defense Nuclear Facilities Safety Board  
 Attn: D. Winters  
 625 Indiana Ave. NW, Suite 700  
 Washington, DC 20004

Nuclear Waste Technical Review Board (2)  
 Attn: Chairman  
 S. J. S. Parry  
 1100 Wilson Blvd., Suite 910  
 Arlington, VA 22209-2297

State Agencies

Attorney General of New Mexico  
 P.O. Drawer 1508  
 Santa Fe, NM 87504-1508

Environmental Evaluation Group (3)  
 Attn: Library  
 7007 Wyoming NE, Suite F-2  
 Albuquerque, NM 87109

Metropolitan Water District of Southern Calif.  
 Attn: J. Narvaiz  
 P.O. Box 54153  
 Los Angeles, CA 90071-3123

NM Energy, Minerals, and Natural  
 Resources Department  
 Attn: Library  
 2040 S. Pacheco  
 Santa Fe, NM 87505

NM Environment Department (3)  
 Secretary of the Environment  
 Attn: Mark Weidler  
 1190 St. Francis Drive  
 Santa Fe, NM 87503-0968

NM Bureau of Mines & Mineral Resources  
 Socorro, NM 87801

NM Environment Department  
 WIPP Project Site  
 Attn: P. McCasland  
 P.O. Box 3090  
 Carlsbad, NM 88221

Laboratories/Corporations

Battelle Pacific Northwest Laboratories (2)  
 Attn: R. E. Westerman  
 R. Romiac, MS P8-38  
 P.O. Box 999  
 900 Battelle Blvd.  
 Richland, WA 99352

Brookhaven National Laboratory  
 Attn: P. D. Moskowitz  
 Environmental & Waste Technology  
 Center  
 Building 830  
 Upton, NY 11973

Harnischfeger Corp.  
 Phonex Engineering Services  
 Attn: R. Luebke  
 2969 S. Chase Avenue  
 Milwaukee, WI 53207-6408

Ian Clelland  
 6656 N. Amdahl Dr.  
 Tucson, AZ 85704

INTERA, Inc.  
 Attn: G. A. Freeze  
 1650 University Blvd. NE, Suite 300  
 Albuquerque, NM 87102

INTERA, Inc. (6)  
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 V. Kelley  
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 J. Beach  
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 INTERA WIPP Library  
 6850 Austin Center Blvd., Suite 300  
 Austin, TX 78731

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 1261 Town Center Drive  
 Las Vegas, NV 89134

INTERA, Inc.  
 Attn: W. Stensrud  
 P.O. Box 2123  
 Carlsbad, NM 88221

Istasca Consulting Group, Inc.  
 Attn: John Timocci  
 Thresher Square East  
 708 South Third Street, Suite 310  
 Minneapolis, MI 55415

Los Alamos National Laboratory  
 Attn: B. Erdal, INC-f2  
 P.O. Box 1663  
 Los Alamos, NM 87544

Morton International, Morton Salt  
 Attn: H. W. Diamond  
 Morton International Building  
 100 N. Riverside Plaza,  
 Randolph Street at the River  
 Chicago, IL 60606-1597

Parsons Brinckerhoff Energy Services, Inc.  
 Attn: W. S. Roman  
 One Penn Plaza  
 New York, NY 10119

Parsons Brinckerhoff Energy Services, Inc. (2)  
 Attn: B. W. Lawrence  
 C. D. Maxon  
 M. S. Lin  
 303 Second Street  
 Suite 850 North  
 San Francisco, CA 94107

Distribution - 1

Waste Isolation Pilot Plant  
 Hazardous Waste Facility Permit  
 Attachment G2, Appendix G2-E  
 November 30, 2010 December 2022 Renewal Draft Permit

Parsons Brinckerhoff International, Inc.  
 Attn: Mary Ann Novak  
 700 11th Street, NW, Suite 710  
 Washington, DC 20001

Phillips Mining, Geotechnical & Grouting  
 Attn: Stephen Phillips  
 8640 North Glenhurst Place  
 Tucson, AZ 85704

RESPEC, Inc. (5)  
 Attn: L. Van Sambeek (3)  
 G. Callahan  
 M. Loken  
 J. Raigan  
 T. Pfeifle  
 3824 Jet Drive  
 P.O. Box 725  
 Rapid City, SD 57709

RESPEC, Inc  
 Attn: Angus Robb  
 4775 Indian School NE, Suite 300  
 Albuquerque, NM 87110-3927

Science Applications International Corp.  
 Attn: W. Thompson  
 15000 W. 6th Avenue, Suite 202  
 Golden, CO 80401

Tech Keps, Inc. (3)  
 Attn: J. Chapman (1)  
 L. Robledo (2)  
 5000 Marble NE, Suite 222  
 Albuquerque, NM 87110

Westinghouse Electric Corporation (5)  
 Attn: Library  
 J. Epstein  
 J. Lee  
 B. A. Howard  
 R. Kehrman  
 P.O. Box 2078  
 Carlsbad, NM 88221

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 1355 Beverly Road  
 McLean, VA 22101

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 7327 Oak Ridge Highway  
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 PLG Incorporated  
 4590 MacArthur Blvd., Suite 400  
 Newport Beach, CA 92660-2027

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 US Geological Survey  
 431 National Center  
 Reston, VA 22092

Carl A. Anderson, Director  
 Board of Radioactive Waste Management  
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 2101 Constitution Ave. NW  
 Washington, DC 20418

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 ICF Kaiser Engineers  
 1800 Harrison St., 7th Floor  
 Oakland, CA 94612-3430

John O. Blomeke  
 720 Clubhouse Way  
 Knoxville, TN 37909

Sue B. Clark  
 University of Georgia  
 Savannah River Ecology Lab  
 P.O. Drawer E  
 Aiken, SC 29802

Konrad B. Krauskopf  
 Department of Geology  
 Stanford University  
 Stanford, CA 94305-2115

Della Roy  
 Pennsylvania State University  
 217 Materials Research Lab  
 Hastings Road  
 University Park, PA 16802

David A. Waite  
 CH<sub>2</sub> M Hill  
 P.O. Box 91500  
 Bellevue, WA 98009-2050

Thomas A. Zordon  
 Zordan Associates, Inc.  
 3807 Edinburg Drive  
 Murrysville, PA 15668

Universities

Harvey Mudd College  
 Attn: M. Cardenas  
 Department of Engineering  
 Claremont, CA 91711

New Mexico State University  
 Waste-management Education & Research  
 Corporation.  
 Attn: R. Bhada  
 P.O. Box 3001  
 Las Cruces, NM 88003-8001

University of California  
 Department of Mechanical and Environmental  
 Engineering  
 Attn: E. Marschall  
 University of California  
 Santa Barbara, CA 93106

University of Nevada-Reno  
 Department of Mining Engineering  
 Mackay School of Mines  
 Attn: J. Daamen  
 Reno, NV 89557

University of New Mexico  
 Center for Radioactive Waste Management  
 Attn: W. Lutze  
 209 Faris Engineering Building  
 Albuquerque, NM 87131-1341

University of New Mexico  
 Department of Civil Engineering  
 Attn: J. C. Stormont  
 Albuquerque, NM 87131-1351

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 Geology Department  
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 141 Northrop Hall  
 Albuquerque, NM 87131

University of Washington  
 College of Ocean & Fishery Sciences  
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 583 Henderson Hall, HN-15  
 Seattle, WA 98195

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 106 W. Hadley St.  
 Las Cruces, NM 88001

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 University of New Mexico  
 Albuquerque, NM 87131

New Mexico Junior College  
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 Lovington Highway  
 Hobbs, NM 88240

New Mexico State Library  
 Attn: N. McCallan  
 325 Don Gaspar  
 Santa Fe, NM 87503

New Mexico Tech  
 Martin Speere Memorial Library  
 Campus Street  
 Socorro, NM 87810

WIPP Public Reading Room  
 Carlsbad Public Library  
 101 S. Halagueno St.  
 Carlsbad, NM 88220

Foreign Addresses

Atomic Energy Canada Ltd. (5)  
 Whiteshell Laboratory  
 Attn: Neil Chandler  
 Glenn McCrank  
 B. Goodwin  
 Malcolm Gray  
 Maria Onefrei  
 Pinawa Manitoba, CANADA ROE 1L0

Distribution - 2



**ATTACHMENT G3**  
**RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE  
RELEASES**



## ATTACHMENT G3

# RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE RELEASES

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G3-2	Definition .....	3
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Table G3-2	Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-II/HalfPACT)
Table G3-2a	Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-III)
Table G3-3	Radiological Surveys During RH TRU Mixed Waste Processing

## ATTACHMENT G3

### RADIOLOGICAL SURVEYS TO INDICATE POTENTIAL HAZARDOUS WASTE RELEASES

#### G3-1 Purpose

Within the Resource Conservation and Recovery Act (RCRA) Permit for the Waste Isolation Pilot Plant (WIPP), ~~detection of~~ radiological ~~contamination on surfaces monitoring~~ is used to ~~indicatedetermine~~ whether a potential release of hazardous constituents has occurred. This method is used in addition to the visual examinations and container inspections mandated by the ~~Permit~~RCRA.

#### G3-2 Definition

This Permit Attachment describes ~~the principle of co-detection. Co-detection is defined as the process of identifying hazardous waste releases from containers of transuranic (TRU) mixed waste by procedures for performing radiological surveys on surfaces and assuming to indicate the release potential for hazardous waste releases from containers by virtue of detection of a radioactive constituent indicates the concurrent release of a hazardous waste constituent release. Co-detection does not apply to the gaseous~~These procedures assume the potential co-release of hazardous and radioactive materials and applies to all releases except the release of volatile organic compounds (VOC) from ~~transuranic (TRU)~~ mixed waste containers ~~nor does it apply to the detection of radioactive constituents in water~~. Radiological surveys are used to indicate the potential presence or absence of hazardous waste constituents based on the presence or absence of ~~radioactive constituents~~radioactivity on surfaces. Radiological surveys do not provide ~~any~~ assessment with regard to ~~the concentrations of hazardous waste constituents~~ since these surveys do not actually detect hazardous waste constituents.

#### G3-3 Discussion

Radiological surveys provide the ~~Permittees~~WIPP facility with a very sensitive method of indicating the potential ~~spill or~~ release of ~~non-VOC~~ hazardous waste constituents through the use of surface sampling (swipes) and radioactivity counting. This approach depends on the nature of the hazardous waste portion of the TRU mixed waste, the nature of the TRU mixed waste, and the nature of the ~~spills~~ or release. The sections below discuss each of these factors.

#### G3-3a Nature of the Hazardous Waste Portion of TRU Mixed Waste

~~The hazardous waste constituents in~~Based on the waste codes listed in the Part A (Permit Attachment B) and discussed in the WIPP Waste Analysis Plan (Permit Attachment C), the ~~hazardous waste constituents in WIPP~~ TRU mixed waste ~~are~~consist mainly U.S. Environmental Protection Agency (EPA)of EPA F-coded solvents and metals that exhibit the toxicity characteristic. The TRU mixed wastes that are to be shipped to the WIPP facility for disposal have been placed into waste categories based on their physical and chemical properties. Waste category information is summarized in Table G3-1 with emphasis on the process that generated the waste. The waste generating processes can be described in five general categories:



~~October 2013~~December 2022 Renewal Draft Permit

- 1 1. Wastes (such as combustible waste) that result from cleaning and decontamination  
2 activities in which items such as towels and rags become contaminated simultaneously  
3 with hazardous and radioactive constituents ~~and radioactivity~~. In these cases, the  
4 hazardous constituent and the radioactive constituent are intimately mixed, both on the  
5 rag or towel used for cleaning and as residuals on the surface of the object being  
6 cleaned. These waste forms are not homogeneous in nature; however, they are  
7 generated in a fashion that ~~distributes~~ensures that the hazardous and radioactive  
8 contaminants ~~coexist~~ throughout the waste matrix.
- 9 2. Wastes generated when materials that contain metals that ~~are believed to~~ exhibit the  
10 toxicity characteristic become contaminated with radioactive constituents~~radioactivity~~ as  
11 the result of plutonium operations (leaded rubber, some glass, and metal waste are  
12 typical examples). These materials may also become contaminated with solvents during  
13 decontamination or plutonium recovery activities.
- 14 3. A class of processes where objects that are not metals are used in plutonium processes  
15 and become contaminated with radioactive constituents~~radioactivity~~. They are  
16 subsequently cleaned with solvents to recover plutonium. Surfaces of these objects  
17 (such as graphite, filters, and glass) may be~~are~~ contaminated with both radioactive  
18 constituents and hazardous constituents.
- 19 4. Waste generating processes involving foundry operations where impurities are removed  
20 from plutonium. These impurities may result in the deposition of toxicity characteristic  
21 metals on the surfaces of objects, such as firebrick, ceramic crucibles, pyrochemical  
22 salts, and graphite, which are contaminated with residual quantities of radioactive  
23 constituents~~radioactivity~~.
- 24 5. In all of the process waste categories in the second half of ~~the attached table~~Table G3-1,  
25 the hazardous constituent and the radioactive constituents~~radioactivity~~ are physically  
26 mixed together as a result of the treatment process. In these wastes, the spill or release  
27 of ~~any portion of~~ the waste matrix may~~will~~ involve both the hazardous waste and the  
28 radioactive waste components, because the treatment process generates a relatively  
29 homogeneous waste form.

~~Some waste forms only contain radioactive contamination on the surface, because they are not  
the result of a treatment process or are not porous in form. These include glass, leaded rubber,  
metals, graphite, ceramics, firebricks, and plastics. In theory, a hazardous waste release could  
occur if the interiors of these materials became exposed and were involved in a release or spill.  
Such an occurrence is not likely during operations, because no activities are planned or  
anticipated that would result in the breaking of these materials to expose fresh surfaces.~~

36 Based on the information in the attached table and the discussion above, hazardous constituent  
37 releases could potentially occur in ~~either only one~~ of two forms: 1) VOCs or ~~and~~ 2) particulate  
38 resulting from the ~~catastrophic~~ failure of the confinement capability of a container. Mechanisms  
39 that can initiate releases in these forms are discussed subsequently. Regardless of how the  
40 release occurs, the nature of the waste and the processes that generated it is such that the  
41 radioactive and hazardous components are assumed to be intimately mixed; ~~A~~a release of one  
42 without the other is not likely, except for releases of VOCs from containers.

1 G3-3b Nature of the TRU Mixed Waste

2 TRU mixed waste is defined as transuranic waste which is also a hazardous waste. The  
3 processes responsible for the radioactive constituents~~radioactivity~~ in the waste are, for the most  
4 part, the same processes responsible for making it a hazardous waste. Therefore, the TRU  
5 mixed waste forms are described in terms of both radioactive and hazardous~~classes of~~ waste  
6 ~~(radioactive and hazardous)~~. The Permit-Treatment, Storage, and Disposal Facility Waste  
7 Acceptance Criteria (**TSDF-WAC**) in Permit Part 2 places limits on the characteristics of the  
8 waste that can be shipped to the WIPP facility based on ~~the characteristics of~~ the waste form.  
9 According to the TSDF-WAC, certain waste forms with specific characteristics are not allowed at  
10 the WIPP facility. Waste with liquid in excess of the TSDF-WAC limits is one waste form that is  
11 not allowed. Other limitations include, but are not limited to, a prohibition on pyrophoric  
12 materials, corrosive materials, ignitable waste, and compressed gases. Furthermore, payload  
13 containers of TRU waste must contain 100 nanocuries or more of transuranic elements per  
14 gram of waste, which means that the radioactive component of the waste will always be present  
15 within the waste in significant concentrations. The TSDF-WAC limitations and restrictions are  
16 provided to ensure that any waste form received at the WIPP facility is stable and can be  
17 managed safely.

18 One benefit of waste form restrictions, such as no liquid in excess of the TSDF-WAC limits, is  
19 that they limit the kinds of releases that could occur to those that would be readily detectable  
20 through visual inspection (i.e., large objects that fall out of ruptured containers) or through the  
21 use of radiological detection ~~radiation monitoring~~ either locally or within the adjacent area to  
22 detect materials that have escaped from containers.

23 G3-3c Nature of the Releases

24 The WIPP facility personnel will handle only sealed containers of TRU mixed waste and derived  
25 waste. The practice of handling sealed containers minimizes the opportunity for releases or  
26 spills. For the purposes of safety analysis (DOE 20181997)<sup>1</sup>, it was assumed that releases and  
27 spills during operations occur by either of two mechanisms: 1) surface contamination and 2)  
28 accidents.

29 Radioactive materials releases resulting from unique and representative hazard evaluation  
30 events are~~Surface contamination is~~ documented in the WIPP Documented Safety Analysis  
31 (DSA)~~Safety Analysis Report (SAR)~~ (DOE 20181997). Surface contamination of a waste  
32 container is considered to be the only credible source of contamination external to the  
33 containers during normal operations. Surface contamination is assumed to be caused by waste  
34 management activities at the generator site that result in the contamination of the outside of a  
35 waste container. Contamination would most likely be particulates (dirt or dust) that would be  
36 deposited during generator-site handling/loading activities. This contamination may not be  
37 detected by visible inspections. Surface contamination is detected~~monitored upon after~~ arrival at  
38 the WIPP facility through the use of swipes and radiation monitoring surveying equipment, as  
39 specified in radiological control procedures pursuant to 10 CFR Part 835. Surveying for  
40 radioactive constituents allows for the detection of contamination that may not be visible on the  
41 surface of the container. WIPP Procedure WP-12-HP1100, "Radiological Surveys" (DOE, 1995).  
42 WP-12-HP1100 is a technical procedure that provides specific methods and guidance for

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<sup>1</sup> DOE 2018, Waste Isolation Pilot Plant Documented Safety Analysis, DOE/WIPP 07-3372, REV. 6a, February 2018.

~~performing surface contamination and dose rate surveys of items, equipment, and areas, but does not cover the monitoring of personnel. Detection using radioactivity is very sensitive and allows for the detection of contamination that may not be visible on the surface of the container.~~

This exceeds the capability required by the RCRA, which is generally limited to inspections that detect only visible evidence of spills or leaks. RCRA-required inspections are specified in Permit Attachment E Part 3.

Releases due to accidents are modeled in the WIPP DSASAR. ~~Significant accidents within the waste handling process are assumed to result in the release of radioactive contaminants and VOCs. Radioactive~~ For the purposes of co-detection, releases are detectable using surface-contamination ~~detectionsampling (swipe)~~ techniques.

### G3-4 Application of Radiological Surveys

Radiological surveys apply to many situations calling for ~~sampling or monitoring surveying~~ to indicate the potential for ~~nonvolatile~~ releases. This includes initial sampling for surface radiological contamination upon receipt, sampling for contamination during waste handling activities, sampling for contamination during decommissioning, sampling for contamination during packaging for off-site shipment, and sampling to demonstrate the effectiveness of decontamination activities that follow a release or spill and retrieval. ~~Radiation monitoring and sampling are~~ Radiological surveying is mandated by DOE Orders and provide an immediate indication of a radiological release or spill, even when ~~they there~~ are ~~not no~~ visibly detectable indications. A release or spill involving hazardous constituents ~~(except VOCs)~~ will also likely involve a release or spill of ~~radioactivity~~ radioactive constituents, based on the processes that generated the waste and the physical form of the waste. These processes mixed the hazardous and radioactive components, as described in Table G3-1, to the extent that detection of the radioactive component can indicate the potential that the hazardous component is also present on a contaminated surface. Radiological surveys to indicate the potential for hazardous waste releases will be performed as specified in the following sections.

#### G3-4a TRU Mixed Waste Processing

Tables G3-2, G3-2a, and G3-3 specify the various steps in the process of receiving and disposing containers of CH TRU mixed waste, including RH TRU mixed waste in shielded containers and RH TRU mixed waste, respectively, where radiological surveys will be performed by the Permittees in accordance with radiological control procedures pursuant to 10 CFR Part 835. ~~WIPP Procedure WP 12-HP1100 provides the detailed description of methods and equipment used when performing surface contamination surveys, dose rate surveys, and large area wipes.~~

#### G3-4b TRU Mixed Waste Releases

The RCRA Contingency Plan (Permit Attachment D) specifies actions required by the Permittees in the event of spills or leaking or punctured containers of CH and RH TRU mixed waste. Following completion of decontamination efforts, the Permittees will perform hazardous material sampling to confirm the removal of hazardous waste constituents from contaminated surfaces.

1 G3-4c Decontamination Activities at Closure

2 The Closure Plan (Permit Attachment G, Section G-1e(2)) specifies decontamination activities  
3 required by the Permittees at closure. Following completion of decontamination efforts, the  
4 Permittees will perform hazardous material sampling to confirm removal of hazardous waste  
5 constituents from contaminated surfaces.

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## TABLES

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**Table G3-1  
Summary of Waste Generation Processes and Waste Forms**

<b>Waste Category</b>	<b>Hazardous Waste Codes</b>	<b>Description of Processes</b>	<b>Description of Waste Forms</b>
Combustibles	F001, F002, F003, D008, D019	Cloth and paper wipes are used to clean parts and wash down gloveboxes. Wood and plastic parts are removed from gloveboxes after they are cleaned. Lead may occur as shielding tape or as minor noncombustible waste in this category.	Materials such as metals may retain traces of organics left on surfaces that were cleaned. Waste may remain on the cloth and paper that was used for cleaning or for wiping up spills.
Graphite		Graphite molds, which may contain impurities of metals, are scraped and cleaned with solvents to remove the recoverable plutonium.	Surfaces may retain residual solvents. Lead may be used as shielding or may be an impurity in the graphite.
Filters	F001, F002	Filters are used to capture radioactive particulate in air streams associated with numerous plutonium operations and to filter particulate from aqueous streams.	Filter media may retain organic solvents that were present in the air or liquid streams.
Benelex® and Plexiglas®	F001, F002, D008	Materials are used in gloveboxes as neutron absorbers. The glovebox assembly often includes leaded glass. All surfaces may be wiped down with solvents to remove residual plutonium.	Surfaces may retain residual solvents from wiping operations. Leaded glass may also be present.
Firebrick and Ceramic Crucibles	F001, F002, F005, D006, D007, D008	Firebrick is used to line plutonium processing furnaces. Ceramic crucibles are used in plutonium analytical laboratories. Both may contain metals as surface contaminants.	Metals deposited during plutonium refining or analytical operations could remain as residuals on surfaces. Surfaces may retain residual solvents.
Leaded Rubber	D008	Leaded rubber includes lead oxide impregnated materials such as gloves and aprons.	The leaded rubber could potentially exhibit the toxicity characteristic.
Metal	F001, F002, D008	Metals range from large pieces removed from equipment and structures to nuts, bolts, wire, and small parts. Many times, metal parts will be cleaned with solvents to remove residual plutonium.	Solvents may exist on the surfaces of metal parts. The metals themselves potentially exhibit the toxicity characteristic.
Glass	F001, F002, D006, D007, D008, D009	Glass includes Raschig rings removed from processing tanks, leaded glass removed from gloveboxes, and miscellaneous laboratory glassware.	Solvents may exist as residuals on glass surfaces and in empty containers. The leaded glass may exhibit the toxicity characteristic.
Inorganic Wastewater Treatment Sludge	F001-F003, D006-D009, P015	Sludge is vacuum filtered and stabilized with cement or other appropriate sorbent prior to packaging.	Traces of solvents and heavy metals may be contained in the treated sludge which is in the form of a solid dry monolith, highly viscous gel-like material, or dry crumbly solid.

<b>Waste Category</b>	<b>Hazardous Waste Codes</b>	<b>Description of Processes</b>	<b>Description of Waste Forms</b>
Organic Liquid and Sludge	F001, F003	Organic liquids such as oils, solvents, and lathe coolants are immobilized through the use of various solidification agents or sorbent materials.	Solvents and metals may be present within the matrix of the solids created through the immobilization process.
Solidified Liquid	F001, F003, D006, D008	Liquids that are not compatible with the primary treatment processes and have to be batched. Typically these liquids are solidified with portland or magnesium cement.	Solvents and metals may be present within the matrix of the solids created through the immobilization process.
Inorganic Process Solids and Soil	F001, F002, F003, D008	Solids that cannot be reprocessed or process residues from tanks, firebrick fines, ash, grit, salts, metal oxides, and filter sludge. Typically solidified with portland or gypsum-based cements.	Solvents and metals may be present within the matrix of the solids created through the immobilization process.
Pyrochemical Salts	D007	Molten salt is used to purify plutonium and americium. After the radioactive metals are removed, the salt is discarded.	Residual metals may exist in the salt depending on impurities in the feedstock.
Cation and Anion Exchange Resins	D008	Plutonium is sorbed on resins and is eluted and precipitated.	Feed solutions may contain traces of solvents or metals depending on the preceding process.



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**Table G3-2  
 Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-II/HalfPACT)**

Step in CH TRU Mixed Waste Processing	Surface Contamination Survey	Dose Rate Survey	Large Area Wipes <sup>a</sup>
<del>Exterior of CH package after arrival at the WIPP facility</del>	<del>X</del>	<del>X</del>	
<del>CHContact Handled pPackage oOuter cConfinement aAssembly (OCA) lid interior and top of iInner cContainment vVessel (ICV) lid</del>	X		X
<del>CHContact Handled pPackage quick connect and vent port</del>	X		
As ICV lid is raised		X	
ICV lid interior and top of payload	X		X
Payload assembly, guide tubes, standard waste box (SWB) and ten-drum overpack (TDOP) connecting devices	X		
As payload assembly is raised, including bottom of payload	<del>X</del>	X	
After placement of payload on facility pallet	X	<del>X</del>	X

<sup>a</sup> Surface contamination surveys of ~~CHContact Handled pPackages~~ are performed in accordance with radiological control procedures pursuant to 10 CFR Part 835 Procedure WP-12-HP1100, which stipulates that all such work be performed under a Radiation Work Permit (RWP). ~~The RWP will only stipulate large area wipes when necessary and not as a routine measure.~~

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**Table G3-2a  
 Radiological Surveys During CH TRU Mixed Waste Processing (TRUPACT-III)**

<b>Step in CH TRU Mixed Waste Processing</b>	<b>Surface Contamination Survey</b>	<b>Dose Rate Survey</b>	<b>Large Area Wipes <sup>a</sup></b>
Exterior of TRUPACT-III <del>on</del> <u>after</u> arrival at <u>the</u> WIPP facility	X	X	
Interior of <del>c</del> <u>O</u> verpack <del>c</del> <u>C</u> over and exterior of <del>c</del> <u>C</u> ontainment <del>I</del> <u>L</u> id	X	X	X
TRUPACT-III <del>v</del> <u>V</u> ent <del>p</del> <u>P</u> ort <del>t</del> <u>T</u> ool <del>a</del> <u>A</u> ssembly quick connect	X		
Interior of <del>c</del> <u>C</u> ontainment <del>I</del> <u>L</u> id and front of SLB2	X	X	X
As SLB2 is removed from TRUPACT-III		X	
After placement of SLB2 on facility pallet	X		X

<sup>a</sup> Surface contamination surveys of ~~CH~~Contact-Handled ~~p~~Packages are performed in accordance with radiological control procedures pursuant to 10 CFR Part 835 Procedure WP-12-HP1100, which stipulates that all such work be performed under an RWP. ~~The RWP will only stipulate large area wipes when necessary and not as a routine measure.~~

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**Table G3-3  
 Radiological Surveys During RH TRU Mixed Waste Processing**

<b>Step in RH TRU Mixed Waste Processing</b>	<b>Surface Contamination Survey</b>	<b>Dose Rate Survey</b>
Exterior of cask <del>on</del> -after arrival at <u>the WIPP facility</u>	X	X
<del>During</del> -After removal of impact limiters on RH-TRU 72-B cask	X	X
During removal of outer lid closure from RH-TRU 72-B cask	X	X
During removal of inner lid closure from RH-TRU 72-B cask	X	
During removal of upper impact limiter on the CNS 10-160B cask	X	X
After removal of upper impact limiter on the CNS 10-160B cask	X	X
After removal of the CNS 10-160B cask from the lower impact limiter	X	X
After transfer of the CNS 10-160B cask lid into the Hot Cell	X	
<del>During</del> -After transfer of waste drum carriages into the Hot Cell	X	
During transfer of waste into the facility canister in the Hot Cell	X	
During transfer of the waste canister from the RH-TRU 72-B cask to the facility cask	X	
Interior of shipping cask inside the RH Bay after unloading of waste canister or drums	X	
Exterior of shield plug subsequent to final canister emplacement		X
Interior of facility cask after completion of waste emplacement	X	

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**ATTACHMENT H**  
**POST-CLOSURE PLAN**

**ATTACHMENT H**  
**POST-CLOSURE PLAN**  
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## ATTACHMENT H

### POST-CLOSURE PLAN

#### Introduction

This ~~Permit~~ Attachment contains the Post-Closure Plan, which describes activities required to maintain the Waste Isolation Pilot Plant (**WIPP**) facility after completion of final facility closure. ~~Since the current plans for operations extend over several decades, t~~he Permittees will periodically reapply for an operating permit in accordance with 20.4.1.900 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal Regulations (CFR) §270.10(h)).

This plan was submitted to the New Mexico Environment Department (**NMED**) in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(13)) ~~and the U.S. Environmental Protection Agency (EPA)~~. The Post-Closure Plan includes the implementation of institutional controls to limit access and groundwater monitoring to assess disposal system performance. Until final facility closure is complete and has been certified in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.115), a copy of the approved Post-Closure Plan and all approved revisions will be on file at the WIPP facility and will be available to the Secretary of the NMED ~~or the EPA Region VI Administrator~~ upon request.

#### H-1 Post-Closure Plan

The post-closure care period begins after completion of closure of the first underground hazardous waste disposal unit (**HWDU**) and continues for 30 years after final closure of the facility. The post-closure care period may be shortened or lengthened by the Secretary of the NMED, based on evidence that human health and the environment are being protected or are at risk. During the post-closure period, the WIPP facility shall be maintained in a manner that complies with the environmental performance standards applicable to the facility. During this period, the Permittees will employ active institutional controls as necessary.

This post-closure plan focuses on activities following final facility closure. However, some discussion of post-closure following panel closure is warranted since some panel closures will occur long before final facility closure. As discussed in Attachment G (Closure Plan), Section G-1e(1), panel closures have been designed to require minimum post-closure maintenance. The Permittees have defined a post-closure care program for closed panels that has three aspects. These are routine inspection ~~s~~ of the openings in the vicinity of the closures ~~and bulkheads used as part of the closures, coupled with the sampling of ventilation air for harmful constituents, repair or replacement of bulkheads that no longer serve their purpose as panel closures, the sampling of ventilation air for harmful constituents;~~ and a Repository Volatile Organic Compound Monitoring Program (**RVMP**). The rules of the Mine Safety and Health Administration as well as Permit Attachment E (Inspection Schedule, Process and Forms) drive the implementation of the first two programs. These rules require that underground mines monitor air quality to assure good breathing air whenever personnel are underground and that mine operators provide safe ground conditions for personnel in areas that require access. Routine monitoring of the openings in the access ways to panels will be continued and these openings will be maintained for as long as access into them is needed. This includes continued reading of installed geomechanical instrumentation, sounding the areas, visual inspection and

1 maintenance activities as required and as described in Permit Attachment A2. In addition, ~~all~~  
2 areas in the underground that are occupied by personnel are checked prior to each day's work  
3 activities for accumulations of harmful gases. Action levels for increasing ventilation to areas  
4 that show high levels of harmful gases are specified as described in standard operating  
5 procedures on file at the WIPP facility.

6 ~~These m~~Monitoring programs will be carried out during the period between the closure of the  
7 first panel and the initiation of final facility closure for the underground facility. The Permittees  
8 have prepared a ~~Volatile Organic Compound Monitoring Plan (VOCMPRVMP)~~ which ~~will be has~~  
9 ~~been~~ implemented to confirm that the annual average concentration of volatile organic  
10 compounds (**VOCs**) in the air emissions from the underground HWDUs do not exceed the VOC  
11 action levels ( $10^{-5}$  for carcinogens and ~~H~~hazard index >1 for non-carcinogens) listed in Permit  
12 Part 4, Section 4.6.2.3. The ~~VOCMP RVMP~~ is provided in Attachment N. The ~~VOCMP RVMP~~  
13 includes monitoring design, sampling and analysis procedures and quality assurance objectives.  
14 This plan is required to demonstrate compliance with 20.4.1.500 and .900 NMAC (incorporating  
15 40 CFR §264.602 and §270.23(a)(2)).

16 The Permittees will operate in accordance with the ~~VOCMP RVMP~~ until after certification of the  
17 closure of the last underground HWDU.

18 ~~The VOCMP uses EPA Compendium Method TO-15. The Permittees have had success with~~  
19 ~~TO-15 at the WIPP if care is taken in placing the sampler to avoid high dust and if stringent~~  
20 ~~cleaning requirements are imposed for the clean canisters. This is necessary because of the~~  
21 ~~extremely low concentrations that are being monitored.~~

22 The ~~VOCMP RVMP will be is~~ implemented under a Quality Assurance Plan that conforms to the  
23 document entitled "EPA Requirements for Quality Assurance Project Plans for Environmental  
24 Data Operations." Quality Assurance criteria required for the target analytes are presented in  
25 Table N-2 in Permit Attachment N. ~~Definitions of these criteria are given in Permit Attachment N~~  
26 ~~along with a discussion of other requirements of the Quality Assurance Program, including~~  
27 ~~sample handling, calibration, analytical procedures, data reduction, validation and reporting,~~  
28 ~~performance and system audits, preventive maintenance, and corrective actions.~~

#### 29 H-1a Post-Closure Plan after Final Facility Closure

30 A number of regulations deal with the period of time that begins once the WIPP facility has  
31 undergone final facility closure and decommissioning. Under 40 CFR Part 191, the period  
32 consists of an active control period and a passive control period; only 100 years of the active  
33 control period can be used in performance assessment. The Land Withdrawal Act (LWA) of  
34 1992 requires that the U.S. Department of Energy (**DOE**) prepare and submit a post-  
35 decommissioning land management plan. The New Mexico hazardous waste regulations at  
36 20.4.1.500 NMAC (incorporating 40 CFR §264.117) requiresrequires post-closure care,  
37 including monitoring, security, and control of property use. Because of the numerous  
38 regulations, the Permittees have prepared a single strategy for post-closure management of the  
39 WIPP site. This strategy consists of three elements: 1) active controls, 2) monitoring, and 3)  
40 passive controls. Only the first and second elements occur within the post-closure period  
41 covered by this permit.



1 H-1a(1) Active Institutional Controls

2 Once a facility is decommissioned, positive actions (referred to as “active institutional controls”)  
3 will be taken to assure proper maintenance and monitoring. The EPA, in 40 CFR §191.14(a)  
4 has specified that active controls will be maintained for as long as practicable and that no more  
5 than 100 years of active institutional control can be assumed in predictions of long-term  
6 performance. This assumption assures that future protection and control does not rely on  
7 positive actions by future generations.

8 The Permittees’ active institutional control program has a primary objective of addressing all  
9 applicable requirements, including restoring the WIPP site as nearly as possible to its original  
10 condition, and thereby equalizing any preference over other areas for development by humans  
11 in the future. Restoration of the WIPP site includes any necessary remedial actions or cleanup  
12 of releases resulting from decommissioning. In addition, as part of the active institutional control  
13 program implemented under 40 CFR §194.14(a), the Permittees will implement monitoring  
14 systems suitable for assessing disposal system performance if such monitoring is feasible.

15 The Permittees will implement the active institutional control program as described in more  
16 detail below:

17 Identification of Active Institutional Control Measures

18 A detailed explanation of the active institutional controls selected by the Permittees as part of  
19 this first step is provided in Permit Attachment H1 (WIPP Active Institutional Controls). This is  
20 the Permittees’ reference design for active institutional controls. The reference design will be  
21 reviewed periodically and updated by the Permittees as appropriate during WIPP disposal  
22 operations. The ongoing review and evaluation ensure that the active institutional controls  
23 implemented are appropriate for the conditions that may exist at that time. The Permittees will  
24 review the reference design prior to implementation and all affected regulatory agencies will be  
25 consulted as part of this review. If updating the reference design proposes any changes in the  
26 Post-Closure Plan as described in this permit, the Permittees shall apply for a permit  
27 modification to include those changes, or submit the reference design and revised Post-Closure  
28 Plan as part of a routine permit renewal application, as required by 20.4.1.500 NMAC  
29 (incorporating 40 CFR §264.118(d)).

30 As part of the active institutional controls program, the Permittees have developed a set of  
31 active institutional controls which will be implemented. These are as follows:

- 32 • A fence line shall be established to control access to the repository’s footprint area (the  
33 waste disposal area projected to the surface). A standard wire fence shall be erected  
34 along the perimeter of the repository surface footprint. The fence shall have gates placed  
35 approximately midway along each of the four sides.
- 36 • An unpaved roadway along the perimeter of the barbed wire fence shall be constructed  
37 to provide ready vehicle access to any point around the fenced perimeter, to facilitate  
38 inspection and maintenance of the fence line, and to permit visual observation of the  
39 repository footprint to the extent permitted by the lay of the land. This roadway shall  
40 connect to the paved south access road.

- 1 • To ensure visual notification, the fence line shall be posted with signs having as a  
2 minimum, a legend reading “Danger—Unauthorized Personnel Keep Out” and a warning  
3 against entering the area without specific permission of the Permittees.
- 4 • Contractual arrangements shall be developed to ensure that periodic inspection and  
5 necessary corrective maintenance is conducted on the fence line, its associated warning  
6 signs, and the roadway. The Permittees will maintain control over all contractual work  
7 and will maintain, in the operating record, the results of all inspections and maintenance  
8 activities.
- 9 • Through direct Permittee staffing support and/or contractual arrangements, procedures  
10 shall be established to provide routine periodic patrols and surveillances of the protected  
11 area by personnel trained in security surveillance and investigation.
- 12 • Mitigating actions will be taken to address any abnormal conditions<sup>1</sup> identified during  
13 periodic surveillance and inspections.
- 14 • Reports of activities associated with the post-disposal active access controls shall be  
15 prepared in accordance with regulatory requirements for submittal to the appropriate  
16 regulatory and legislative authority.

17 Details on meeting these criteria are found in Permit Attachment H1.

#### 18 Preparation of a Post-Decommissioning Land Management Plan

19 Section 13(b) of the LWA requires the DOE to prepare and submit a plan for managing the land  
20 withdrawal area after decommissioning the WIPP facility. This plan will include a description of  
21 both the active and passive institutional controls that will be imposed after decommissioning is  
22 complete. This plan will be prepared in consultation with the Department of Interior and the state  
23 of New Mexico. If the land management plan proposes any changes in the Post-Closure Plan as  
24 described in this permit, the Permittees shall apply for a permit modification to include those  
25 changes; or submit the land management plan and revised Post-Closure Plan as part of a  
26 routine permit renewal application, as required by 20.4.1.500 NMAC (incorporating 40 CFR  
27 §264.118(d)).

#### 28 Preparation of the Active Institutional Control Plan

29 An active institutional control plan will be initiated prior to actual plant ~~closure, and~~ closure and  
30 will contain ~~all~~ the information needed to implement the active and passive institutional controls  
31 for the WIPP facility. Active institutional control planning will be based on the reference design  
32 and will take into account the most current information regarding the facility and its vicinity and  
33 will make use of state-of-the-art materials and techniques. This plan will include acceptable  
34 radiological decontamination levels pursuant to 10 CFR Part 835, sampling and analysis plans,  
35 and QA/QC specifications. If ~~such future plan~~ the Active Institutional Controls Plan contains  
36 provisions different from those in this Post-Closure Plan or Permit Attachment H1 (Active

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<sup>1</sup> “Abnormal conditions” include any natural or human-caused conditions which could affect the integrity of Active  
active Institutional controls required by the Permit or which could affect compliance of the WIPP facility  
with applicable RCRA standards.

1 Institutional Controls), the Permittees shall submit a request for modification of the Post-Closure  
2 Plan and the WIPP Permit. The changes must be approved and made part of the revised Permit  
3 before the changes are implemented, in accordance with 20.4.1.500 NMAC (incorporating 40  
4 CFR §264.118(d)).

#### 5 Implementation of Active Institutional Control Measures

6 Most of the active institutional control measures, such as long-term site monitoring and site  
7 remedial actions, will be implemented simultaneously with facility closure. However, it may be  
8 possible to implement some measures earlier. For example, salt disposal may begin prior to  
9 final plant closure. Reclamation and restoration of unused disturbed surface areas has already  
10 begun. Guarding and maintenance activities, which are already in place, could evolve into an  
11 appropriate type of post-closure activity, subject to appropriate modifications of the Permit.

#### 12 H-1a(2) Monitoring

13 Post-closure groundwater monitoring will involve a continuation of the monitoring plan in Permit  
14 Attachment L as described in Permit Part 5. The sampling frequency may be changed to a  
15 frequency of every two years after final facility closure is complete by modification of the Permit  
16 as approved by the Secretary of the NMED in accordance with 20.4.1.901.B NMAC  
17 (incorporating 40 CFR §270.42). In addition, the final target analyte list specified in Permit  
18 Attachment L may be changed by permit modification based on final TRU mixed waste volume.

#### 19 H-2 Notices Required for Disposal Facilities

##### 20 H-2a Post-Closure Certification

21 Within 60 days of completion of the post-closure care period after final facility closure, the  
22 Permittees will submit to the Secretary of the NMED, via registered mail, a certification that  
23 post-closure care was performed in accordance with the specifications of the approved post-  
24 closure plan. The certification will be signed by the Permittees and by an independent New  
25 Mexico registered professional engineer. Documentation supporting the independent registered  
26 engineer's certification and a copy of the certification will be furnished to the Secretary of the  
27 NMED.

##### 28 H-2b Post-Closure Notices

29 Within 60 days after certification of closure of each underground HWDU or final facility closure,  
30 the Permittees will submit to the Secretary of the NMED, and to the Eddy County government or  
31 other applicable local government agencies, a record of the type, location, and quantity of  
32 hazardous wastes disposed of in each underground HWDU as required in 20.4.1.500 NMAC  
33 (incorporating 40 CFR §264.119).

**ATTACHMENT H1**  
**ACTIVE INSTITUTIONAL CONTROLS DURING POST-CLOSURE**

## ATTACHMENT H1

### ACTIVE INSTITUTIONAL CONTROLS DURING POST-CLOSURE

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3 ~~Figure H1-1 Spatial View of WIPP Surface and Underground Facilities~~

4 ~~Figure H1-2 Standard Waste Box and Seven-Pack Configuration~~

5 ~~Figure H1-3 Typical Shaft Sealing System~~

6 ~~Figure H1-4 Perimeter Fenceline and Roadway~~

7

8 **ACRONYMS**

9 CH contact-handled

10 CFR Code of Federal Regulations

11 DOE U.S. Department of Energy

12 EPA U.S. Environmental Protection Agency

13 LWA Land Withdrawal Act

14 NMAC New Mexico Administrative Code

15 NMED New Mexico Environment Department

16 SWB standard waste box

17 TRU transuranic

18 WIPP Waste Isolation Pilot Plant

19

## ATTACHMENT H1

### ACTIVE INSTITUTIONAL CONTROLS DURING POST-CLOSURE

#### Introduction

Under the requirements of 20.4.1.500 New Mexico Administrative Code (NMAC) (incorporating Title 40 of the Code of Federal Regulations (CFR) §264.118(b), the following activities identified as active institutional controls during post-closure are incorporated into the Post-Closure Plan.

The post-closure requirements of this permit include 20.4.1.500 NMAC, incorporating:

- 40 CFR §264.117(a)(1), which requires that  
“Post-closure care for each hazardous waste management unit subject to the requirements of §264.117 through 264.120 must begin after completion of closure of the unit and continue for 30 years after that date...”
- 40 CFR §264.601, which requires that  
“A miscellaneous unit must be...maintained and closed in a manner that will ensure protection of human health and the environment...”
- and 40 CFR §264.603, which requires that  
“A miscellaneous unit that is a disposal unit must be maintained in a manner that complies with §264.601 during the post-closure care period.”

The containment requirements for a disposal system for transuranic (**TRU**) radioactive wastes are defined in Title 40 CFR §191.13 (U.S. Environmental Protection Agency [**EPA**] 1993). ~~40 CFR §191.14 is titled Assurance Requirements.~~ With regard to the active institutional controls aspects of the Assurance Requirements, 40 CFR §191.14 states the following:

“To provide the confidence needed for long-term compliance with the requirements of §191.13, disposal of spent fuel or high-level or transuranic wastes shall be conducted in accordance with the following provisions... (a) Active institutional controls over disposal sites should be maintained for as long a period of time as is practicable after disposal; however, performance assessments that assess isolation of the wastes from the accessible environment shall not consider any contribution from active institutional controls for more than 100 years after disposal...”

40 CFR §191.12 states the following:

- “Active institutional controls mean:
- 1) controlling access to a disposal site by any means other than passive institutional controls,
  - 2) performing maintenance operations or remedial actions at a site,
  - 3) controlling or cleaning up releases from a site, or



1 4) monitoring parameters related to disposal system performance.”

2 **Purpose:** This ~~Permit~~ Attachment describes the design of a system that the Permittees will  
3 implement for compliance with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR  
4 §264.118(b)) and 40 CFR §191.14(a) to control access to the Waste Isolation Pilot Plant (**WIPP**)  
5 disposal site and implement maintenance and remedial actions pertaining to the site access  
6 controls. In addition, this ~~Permit~~ Attachment addresses the scheduling process for control of  
7 inspection, maintenance, and periodic reporting related to long-term monitoring. Long-term  
8 monitoring addresses the monitoring of disposal system performance, as required by 40 CFR  
9 §191.14(b), and environmental monitoring, in accordance with ~~this the~~ Permit and the  
10 Consultation and Cooperation Agreement between the U.S. Department of Energy (**DOE**) and  
11 the state of New Mexico. The scheduling process will also address evaluation of testing  
12 activities related to the permanent marker system design contained within the passive  
13 institutional controls (not required by ~~this permit~~the Permit).

14 Implementation of active institutional controls at the WIPP site will commence when final facility  
15 closure is achieved, as specified in Permit Part 6 and Permit Attachment G. Implementation of  
16 active institutional controls marks the transition from the active life of the facility (which ends  
17 upon certification of closure) to the post-closure care period, as specified in 20.4.1.500 NMAC  
18 (incorporating 40 CFR §Part 264, Subpart G). The Permittees will continue the imposition of  
19 active institutional controls under this Permit until the New Mexico Environment Department  
20 (**NMED**) approves the post-closure certification specified in Permit Part 7 and Permit  
21 Attachment H.

22 Decommissioning activities include decontamination and site restoration. The decontamination  
23 effort will be completed prior to sealing of the shafts to allow disposal of ~~all~~ derived waste  
24 (radioactive and/or mixed waste derived from TRU/TRU-mixed waste received at the WIPP  
25 facility) into the repository. The implementation of active institutional controls upon certification  
26 of facility closure will prevent human intrusion into the repository. The Permittees’ restoration  
27 efforts will return the land disturbed by the WIPP activities to a stable ecological state that will  
28 assimilate with the surrounding undisturbed ecosystem. Necessary exceptions to returning the  
29 site to its full pre-WIPP condition include measurements associated with long-term monitoring.

30 **Scope:** The active institutional control requirements include a means of controlling access to  
31 the site of the repository’s surface footprint (the repository area projected to the surface) and  
32 maintenance, including corrective actions, for access control system components. Active control  
33 of access to the site will be exercised by the Permittees for the duration of the post-closure care  
34 period. Although the Permittees are only required to maintain active institutional controls until  
35 approval of the post-closure certification by the NMED, the Permittees will continue active  
36 institutional controls for at least 100 years after final facility closure to satisfy other regulatory  
37 requirements. Control of access will prevent intrusion into the disposed waste by deep drilling or  
38 mining for natural resources. This ~~Permit~~ Attachment also specifies a process for scheduling  
39 activities related to the long-term monitoring of the repository. Some of the activities supporting  
40 the monitoring programs will be initiated during the active life of the facility to establish  
41 databases. These activities are planned to continue beyond closure through the time after  
42 removal of the site structures and return of the land disturbed by the WIPP activities to a stable  
43 ecological state that will assimilate with the surrounding undisturbed ecosystem. Long-term  
44 monitoring requirements will be necessarily integrated with efforts toward returning the land to a  
45 stable ecological state.

1 **Background:** The WIPP ~~facility~~ was ~~sited and designed~~ authorized by Congress as a research  
2 and development facility to demonstrate the safe disposal of radioactive wastes. The wastes are  
3 derived from DOE defense-related activities. Specifically, the mission of the WIPP ~~project~~  
4 Project is to conduct research, demonstration, and siting studies relevant to the ~~facilitate~~  
5 permanent disposal of TRU wastes. Most of these wastes ~~will be~~ are contaminated with  
6 hazardous constituents, making them mixed wastes.

7 The WIPP Land Withdrawal Act (LWA) addresses the disposal phase of the WIPP  
8 ~~project~~ Project, the period following closure of the site, and the removal of the surface facilities.  
9 The LWA set aside 10,240 acres (4,144 hectares) located in Eddy County, 26 miles (42  
10 kilometers) east of Carlsbad, New Mexico, as the WIPP site. A 277-acre (112-hectare) portion  
11 within the 10,240 acres (4,144 hectares) is bounded by a barbed wire fence. This fenced area  
12 contains the surface facilities and the mined salt piles for the WIPP ~~site~~ facility. Figure M-44H1-4  
13 is a cutaway illustrating the spatial relationship of the surface facilities and the underground  
14 repository.

15 ~~Upon receipt~~ After receiving ~~of~~ the necessary certifications and permits from the EPA and the  
16 ~~New Mexico Environment Department~~ NMED, the Permittees ~~will begin~~ began disposal of  
17 contact-handled (**CH**) and remote-handled (**RH**) TRU and TRU mixed waste in the WIPP facility.  
18 ~~This waste emplacement and disposal phase~~ The Disposal Phase will continue until the  
19 initiation of final facility closure when the Permit term expires or Hazardous Waste Disposal  
20 Units HWdUs have received the final volume of waste as specified in Permit Part 4, Table 4.1.1.  
21 or when remaining within the 6.2 million cubic feet ( $\text{ft}^3$ ) (175,564 cubic meters ( $\text{m}^3$ )) of LWA TRU  
22 waste volume limit has been reached, and as long as the Permittees comply with the  
23 requirements of the Permit. At that time, final facility closure will be initiated as described in  
24 Renewal Permit Attachment G. ~~For the purposes of this Permit Attachment,~~ When the original  
25 Permit was issued, this time period ~~was~~ is assumed to be 25 years. The waste ~~will be~~ is shipped  
26 from DOE facilities across the country in specially designed transportation containers certified  
27 by the Nuclear Regulatory Commission. The transportation routes from these facilities to the  
28 WIPP facility have been predetermined. The CH and RH TRU mixed waste ~~will be~~ is packaged  
29 in ~~55-gallon (208-liter), 85-gallon (322-liter), 100-gallon (379-liter) steel drums, standard waste~~  
30 ~~boxes (SWBs), ten drum overpacks (TDOPs), and/or standard large box 2s (SLB2s).~~ An SWB  
31 is a steel container having a free volume of 66.3 cubic feet (1.88 cubic meters). Figure H1-2  
32 ~~shows the general arrangement of a seven-pack of drums and an SWB as received in a~~  
33 ~~Contact-Handled Package.~~ approved containers as listed in Permit Part 3, Section 3.3.1 and  
34 described in Permit Attachment A1. ~~RH TRU mixed waste inside a Remote-Handled Package is~~  
35 ~~contained in one or more of the allowable containers described in Permit Attachment A1. Some~~  
36 ~~RH TRU mixed waste may arrive in shielded containers as described in Permit Attachment A1.~~

37 Upon receipt and inspection of the waste containers in the ~~waste handling building~~ Waste  
38 Handling Building Container Storage Unit, the containers ~~will be~~ are moved into the repository  
39 2,150 feet (655 meters) below the surface. The containers ~~will be~~ are then ~~be~~ is transported to a  
40 disposal room. (See Figure M-44H1-4 for room and panel arrangement.) ~~The initial seven~~  
41 ~~disposal rooms are in Panel 1. Panel 1 is the first of eight panels planned to be excavated.~~  
42 ~~Special supports and ground control corrective actions have been implemented in Panel 1 to~~  
43 ~~ensure its stability.~~ Upon filling an entire panel, that panel will be closed to isolate it from the rest  
44 of the repository and the ventilation system. During the period of time it takes to fill a given  
45 panel, an additional panel will be excavated. Sequential excavation of Panels 2 through 8 panels  
46 will ensure that these individual panels remain stable during the entire time a panel is being

1 filled with waste. Ground control maintenance and evaluation with appropriate corrective action  
2 will be required to ensure that ~~Panels 9 and 10~~ (ventilation and access drifts in the repository)  
3 remain stable.

4 Decontamination of the WIPP facility will commence with a detailed radiation survey of the  
5 entire site. ~~Contaminated~~Radiologically contaminated areas and equipment will be evaluated  
6 and decontaminated ~~in accordance with applicable requirements consistent with radiological~~  
7 ~~control procedures pursuant to 10 CFR Part 835. Hazardous waste decontamination, if needed,~~  
8 ~~will be conducted in accordance with standard 20.4.1.500 NMAC (incorporating 40 CFR Part~~  
9 ~~264) or as prescribed by the Permit.~~ Where decontamination efforts identify areas that meet  
10 clean closure standards for permitted container storage units and are below radiological ~~release~~  
11 ~~criteria~~control limits pursuant to 10 CFR Part 835, routine dismantling and salvaging practices  
12 will determine the disposition of the material or equipment involved. Material and equipment that  
13 do not meet these standards and criteria will be emplaced in the ~~access entries~~final open  
14 ~~disposal area (Panels 9 and/or 10) after chemical compatibility is evaluated pursuant to Permit~~  
15 ~~Part 2, Section 2.3.3.4 (as applicable).~~ Upon completion of emplacement of the contaminated  
16 facility material, the entries will be closed, and the repository shafts will be sealed. Final  
17 ~~repository facility~~ closure includes sealing the shafts leading to the repository. Figure ~~M-64H1-3~~  
18 illustrates the shaft sealing arrangement. Certification of closure will end disposal operations  
19 and initiate the post-closure care period for implementation of active institutional controls.

#### 20 H1.1 Active Institutional Controls

21 Active institutional controls during post-closure consist of three elements:

- 22 • controlling access to a disposal site,
- 23 • performing maintenance operations or remedial actions at a site, and
- 24 • controlling or cleaning up releases from a site.

25 The LWA has removed the WIPP site from public use as a site for mining and other types of  
26 mineral resource extraction. Since any type of exploration activity would require authorization,  
27 the issuance of approval to intrude upon the repository is precluded by the LWA. The existence  
28 of the LWA as law permits meeting the requirements of the first element above by implementing  
29 low technology barriers. These barriers include a posted fence and active surveillance at a  
30 frequency that denies sufficient time for an individual or organization to intrude into the  
31 repository undetected using today's drilling technology. Maintenance and remedial actions at  
32 the WIPP site will be conducted by the Permittees at the time of implementing the access  
33 controls for the site. The control or cleanup of releases from the site will be conducted as part of  
34 the operational program prior to sealing of the shafts. This is necessary to ensure that ~~all~~  
35 derived waste is disposed of within the repository prior to shaft sealing.

36 The Permittees shall maintain the access controls. This requirement includes the maintenance  
37 and corrective actions necessary to ensure that the fence and patrol requirements (surveillance)  
38 are met. The active institutional controls to be implemented by the Permittees after final closure  
39 are the following:

- 40 1. A fence line will be established to control access to the repository footprint area on the  
41 surface. A standard four-strand (three barbed and one unbarbed, in accordance with the  
42 Bureau of Land Management specifications) wire fence will be erected along the

1 perimeter of the repository surface footprint. To provide access to the repository footprint  
2 during construction of the berm (which may be built in multiple sections simultaneously),  
3 the fence will have gates placed approximately midway along ~~each of the four~~  
4 ~~sides~~selected legs of the fenced areas. these These gates will remain locked with access  
5 controlled by the Permittees. The ~~western~~ gates will be 20 feet (6 meters) wide. The  
6 ~~remaining three gates will each be 16 feet (4.9 meters) wide.~~wide enough to  
7 accommodate the equipment that will be used to build the berm. Additional fencing will  
8 be constructed where appropriate for remote locations that are used for disposal system  
9 monitoring. Such fences will meet the same construction specifications as the repository  
10 footprint perimeter fence.

11 2. Unpaved roadways 16 feet (4.9 meters) wide will be established along the perimeter of  
12 the barbed wire fence as well as along the WIPP site boundary. These roadways will be  
13 constructed so as to provide ready vehicle access to any point around the fenced  
14 perimeter and the site boundary. These roadways will facilitate inspection and  
15 maintenance of the fenceline and will allow visual observation of the repository footprint  
16 and the site boundary to the extent permitted by the lay of the land. These roadways will  
17 connect to the paved south access road. Roads to remote sites will also be constructed  
18 and maintained where appropriate.

19 3. The fence line will be posted with signs having, as a minimum, a legend reading  
20 "Danger—Unauthorized Personnel Keep Out" (20.4.1.500 NMAC (incorporating 40 CFR  
21 §264.14[c])) and warning against entering the area without specific permission of the  
22 Permittees. The legend must be written in English and Spanish. The signs must be  
23 legible from a distance of at least 25 feet (7.6 meters). The size of the visual warning  
24 and the spacing of the warning signs will be sufficiently large and close to ensure that  
25 one or more of the signs can be seen from any approach prior to an individual actually  
26 making contact with the fence line. In no case will the spacing be greater than 300 feet  
27 (91.5 meters).

28 4. The Permittees will ensure that periodic inspection and expedited corrective  
29 maintenance are conducted on the fence line, its associated warning signs, and  
30 roadways.

31 5. The Permittees will provide for routine periodic patrols and surveillance of ~~all~~ areas  
32 controlled by or under the authority of the Permittees by personnel trained in security  
33 surveillance and investigation.

34 6. The Permittees will implement the periodic monitoring requirements of the long-term  
35 monitoring system.

36 7. The Permittees will submit a Permit modification request for any proposed modifications  
37 to the active institutional controls appropriate for access control, as specified in  
38 20.4.1.900 NMAC (incorporating 40 CFR §270.42).

39 8. The Permittees will immediately take appropriate action to address abnormal conditions  
40 identified during periodic surveillance and inspections. Abnormal conditions include any  
41 natural or human-caused conditions which would affect the integrity of the active  
42 institutional controls.

1 9. Reports addressing activities associated with the performance of the active access  
2 controls after final closure will be prepared periodically according to applicable  
3 requirements by the Permittees for submittal to the appropriate regulatory and legislative  
4 authorities.

#### 5 H1.1.1 Repository Footprint Fencing

6 ~~Access to an area~~The fenced area will be composed of two adjoining rectangular areas (See  
7 Figure M-65). One rectangular area will be approximately 2,780 feet by 2,360 feet (875 meters  
8 by 720 meters), covering the area over Panels 1-8. The second (adjoining) rectangular area will  
9 be approximately 1,040 feet by 1,210 feet (317 meters by 369 meters) covering the area over  
10 Panels 11 and 12. In the future, if more panels are proposed and permitted, the repository  
11 footprint fencing areas will be updated. The fenced area will be controlled by a four-strand  
12 barbed wire fence. ~~A single gate~~Gates will be included as needed along ~~each the sides~~ of the  
13 fence for access. These gates will remain locked with access controlled by the Permittees.  
14 Around the perimeter of the fence, an unpaved roadway 16 feet (4.9 meters) wide will be cut to  
15 allow for patrolling of the perimeter. Figure ~~M-65~~H1-4 is an illustration of the fence line in  
16 relation to the repository footprint. Patrolling of the perimeter is based upon the need to ensure  
17 that no mining or well drilling activity is initiated that could threaten the integrity of the repository.

18 Fencing off an area larger than the disposal area footprint would not significantly reduce the risk  
19 of intrusion but would interfere with cattle grazing established prior to the LWA. The LWA states  
20 that the Secretary of Energy can allow grazing to continue where it was established prior to  
21 enactment of the LWA. Based upon current drilling technologies, discussions with local well  
22 drilling organizations, and observation of well drilling activities in the WIPP vicinity, it typically  
23 requires at least two to three days for a driller to set up a deep drilling rig and commence actual  
24 drilling operations. Attaining the 2,150-foot (655-meter) depth that would approach the  
25 repository horizon takes at least another week to 10 days. Based upon current drilling practices,  
26 patrolling the fenced area two to three times weekly would identify any ~~potential~~ drilling activity  
27 well before any breach of the repository could occur. Therefore, the perimeter fence will be  
28 patrolled three times weekly after final closure.

29 Construction of access control systems using higher technology than described is not required.  
30 Likewise, continuous surveillance whether human or electronic is not required.

#### 31 H1.1.2 Surveillance Monitoring

32 The Permittees will conduct periodic surveillance of the site and the repository footprint during  
33 the post-closure period. Unpaved roadways around the WIPP site boundary and around the  
34 repository footprint will facilitate such surveillance. Contractual arrangements with a local  
35 organization such as the Eddy County Sheriff's Department may be established which would  
36 provide some distinct advantages. Among the advantages are the following:

- 37 • deputies are trained in patrol and surveillance activities,
- 38 • deputies are authorized to arrest members of the general public who are found to be  
39 violating trespassing laws,
- 40 • the liability associated with apprehension, attempted apprehension, or circumstances  
41 arising from attempts would remain with the Sheriff's Department, and



- the general area to be patrolled is already a part of the Sheriff's area of responsibility.

Surveillance will consist of drive-by patrolling around the fenced perimeter a minimum of ~~two~~ **three** times per week ~~(weather and road conditions permitting)~~. In the course of the patrol, particular note will be taken of the fence and sign integrity. In addition, the locked condition of each gate will be checked to ensure that gate integrity is maintained and there is no evidence of tampering. Surveillance will also include visual observation of the entire enclosed area for any signs of human activity. Additionally, surveillance patrols will be conducted around the site boundary's perimeter for signs of unauthorized human activities. A routine summary of each month's surveillance activity will be prepared documenting the date and time of each patrol and any unusual circumstances that may have been observed. This surveillance routine will continue throughout the post-closure care period.

### H1.1.3 Maintenance and Remedial Actions

Anticipated maintenance and remedial action issues during the post-closure care period are minimal and should encompass such issues as

- fence and road maintenance,
- repair of any damage that occurs,
- response to evidence of potential erection of drilling equipment, and
- response to unauthorized entry into prohibited areas.

The Permittees will provide maintenance services within a reasonable time after the need is identified during routine patrolling activity. Any observed vandalism or unauthorized entry will be investigated, and action will be taken as the circumstances warrant.

### H1.1.4 Control and Clean-up of Releases

The decontamination process and disposal of the derived waste will be completed prior to sealing the shafts and final facility closure. With the location of the WIPP repository at 2,150 feet (655 meters) below the surface and with panels closed and shafts sealed, the potential for releases of radioactive material or hazardous constituents following the sealing of the shafts is precluded. There will be no credible pathway for releases from the repository other than human intrusion. Routine patrols in accordance with access control requirements will preclude human intrusion into the repository during the post-closure period.

### H1.1.5 Groundwater Monitoring

Groundwater monitoring is the only monitoring program required by the Permit that will be conducted throughout the post-closure care period. The post-closure groundwater monitoring requirements are specified in Permit Part 7 and Permit Attachment L.

### H1.2 Additional Post-Closure Activities

With the certification of closure of the WIPP facility and return of the land disturbed by the WIPP activities to a stable ecological state that will assimilate with the surrounding undisturbed ecosystem, continuous occupancy of the site for operational and security purposes will cease. Any additional activities will be imposed through the Post-Closure Care Permit issued by the NMED after certification of closure.

1 H1.3 Quality Assurance

2 The quality assurance and quality control plan will be applied to the procurement of materials for  
3 and the erection of the fences enclosing the repository footprint. In particular, quality control  
4 inspection of the placement and tensioning of the barbed wire and chain link fabric will be  
5 applied and utilized to provide reasonable assurance that the fencing structures will function  
6 during the post-closure care period with normal maintenance.

7 Quality assurance and quality control will also be applied to the sampling and analyses  
8 supporting the environmental monitoring program. Contractors collecting samples and  
9 laboratories conducting analyses for the Permittees shall be qualified in accordance with  
10 guidelines prescribed in the most current edition of the Permittees' quality assurance program  
11 document at the time that the contracts are awarded.

12 References

13 EPA (U.S. Environmental Protection Agency). 1993. 40 CFR Part 191 Environmental Radiation  
14 Protection Standards for the Management and Disposal of Spent Nuclear Fuel, High-Level and  
15 Transuranic Radioactive Waste; Final Rule. *Federal Register*, Vol. 58, No. 242, pp. 66398-  
16 66416, December 20, 1993. Office of Radiation and Indoor Air, Washington, D.C.

17 U.S. Congress. 1992. Waste Isolation Pilot Plant Land Withdrawal Act as amended. Public Law  
18 102-579, 106 Stat. 4777, October 1992. 102nd Congress, Washington, D.C.

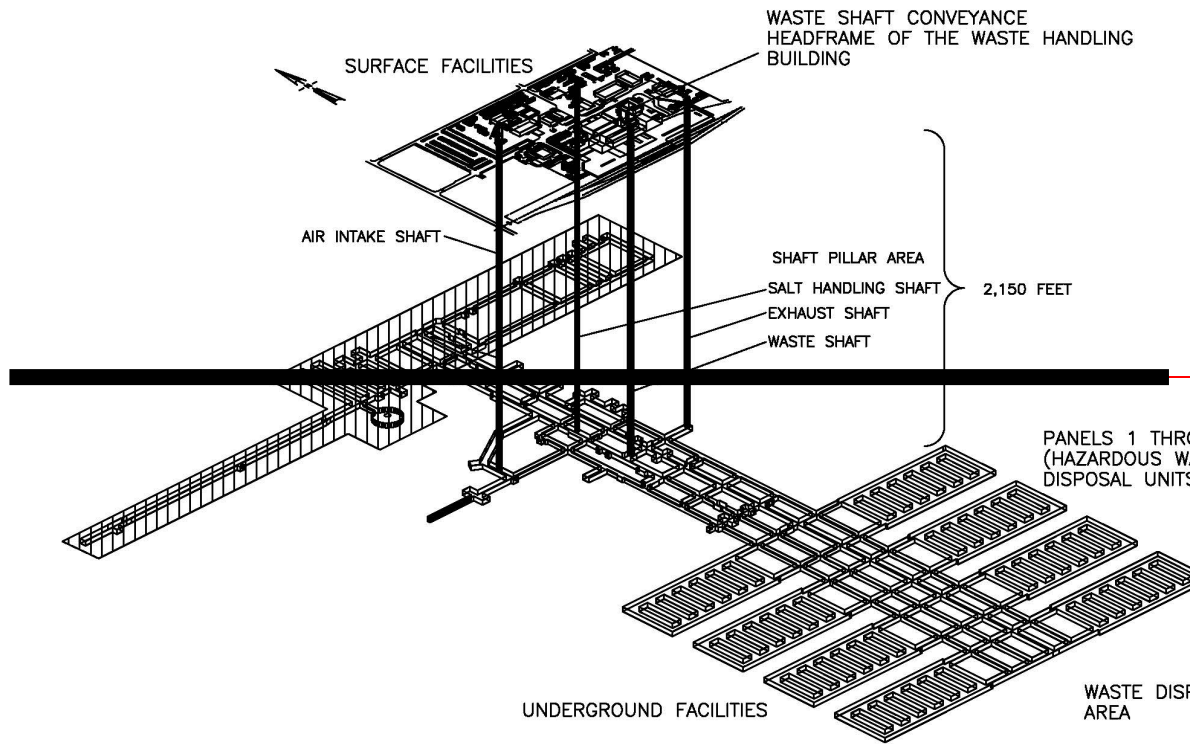
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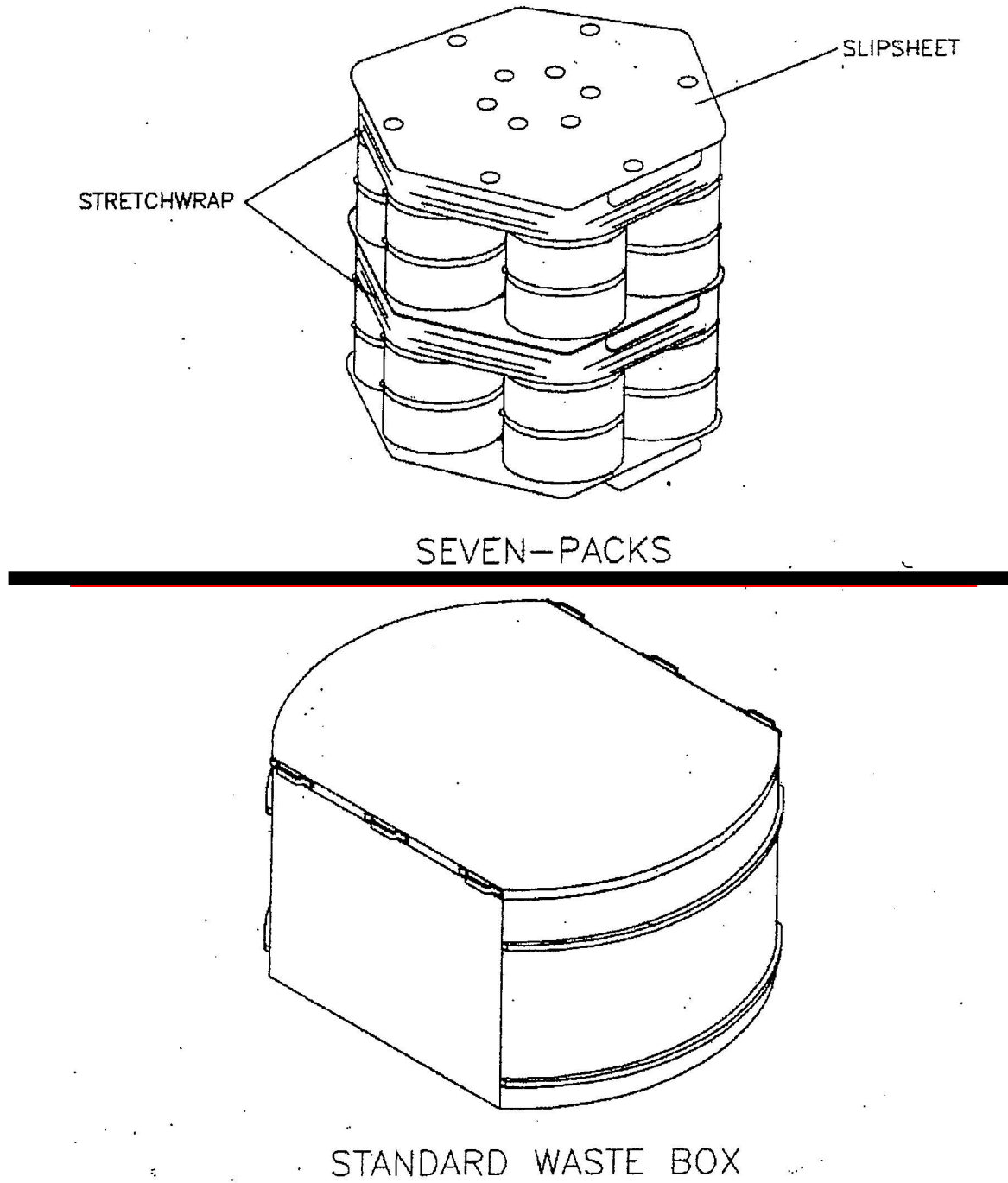
1

## **FIGURES**

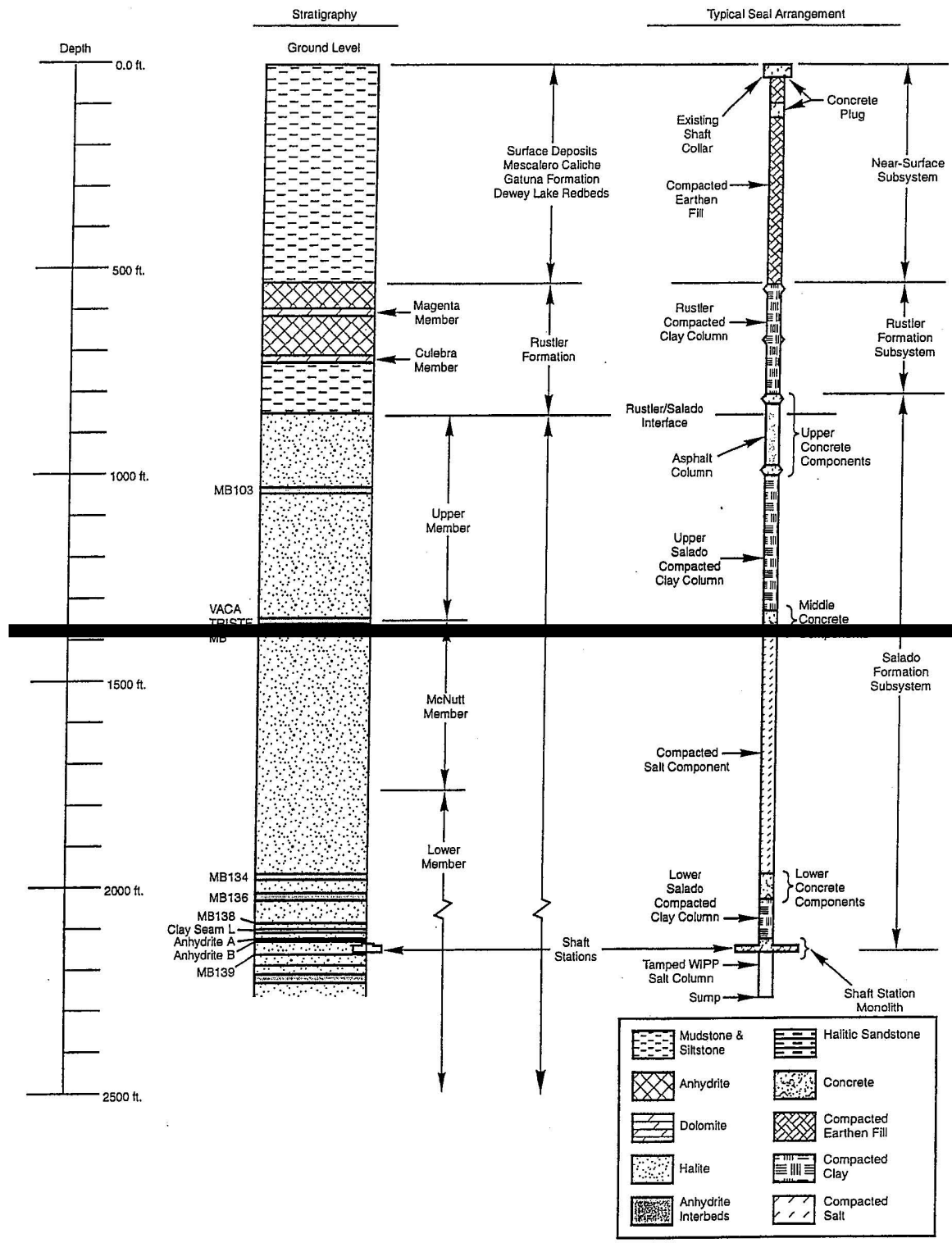
2



**Figure H1-1**  
**Spatial View of WIPP Surface and Underground Facilities**

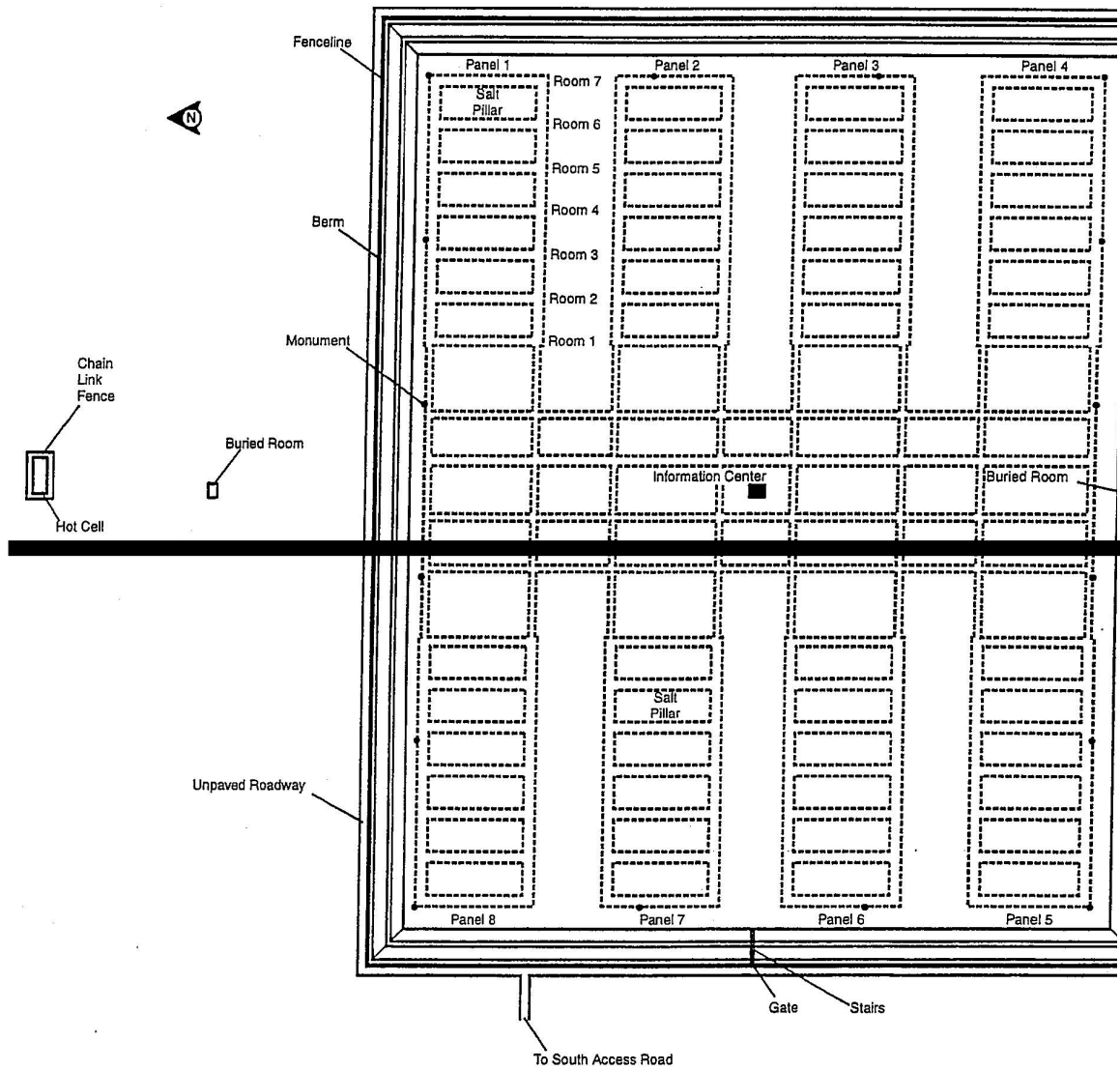


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CCA-AIC306-0

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CCA-AIC

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**ATTACHMENT I**  
**COMPLIANCE SCHEDULE**  
**RESERVED**

Waste Isolation Pilot Plant  
Hazardous Waste Facility Permit  
Attachment I

~~November 30, 2010~~ December 2022 Renewal Draft Permit



**ATTACHMENT J**  
**HAZARDOUS WASTE MANAGEMENT UNIT TABLES**

## ATTACHMENT J

### HAZARDOUS WASTE MANAGEMENT UNIT TABLES

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<b>Table</b>	<b>Title</b>
Table J-1	Waste Handling Building (WHB) Container Storage Unit
Table J-2	Parking Area Container Storage Unit
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**Table J-1  
 Waste Handling Building (WHB) Container Storage Unit**

<b>Description</b>	<b>Area</b>	<b>Maximum Capacity</b>	<b>Container Equivalent</b>
CH Bay Storage Area	32,307 ft <sup>2</sup> (3,001 m <sup>2</sup> )	4,800 ft <sup>3</sup> (135.9 m <sup>3</sup> )	13 loaded facility pallets and 4 CH Packages at the TRUDOCKS
CH Bay Surge Storage Area	included in CH Bay Storage Area	1,600 ft <sup>3</sup> (45.3 m <sup>3</sup> )	5 loaded facility pallets
Derived Waste Storage Area	included in CH Bay Storage Area	66.3 ft <sup>3</sup> (1.88 m <sup>3</sup> )	1 Standard Waste Box
<b>Total for CH Waste</b>	32,307 ft <sup>2</sup> (3,001 m <sup>2</sup> )	<b>6,466.3 ft<sup>3</sup></b> <b>183.1 m<sup>3</sup></b>	
RH Bay	12,552 ft <sup>2</sup> (1,166 m <sup>2</sup> )	156 ft <sup>3</sup> (4.4 m <sup>3</sup> )	2 loaded casks and 1 drum of derived waste
Cask Unloading Room	382 ft <sup>2</sup> (36 m <sup>2</sup> )	74 ft <sup>3</sup> (2.1 m <sup>3</sup> )	1 loaded cask
Hot Cell	1,841 ft <sup>2</sup> (171 m <sup>2</sup> )	94.9 ft <sup>3</sup> (2.7 m <sup>3</sup> )	12 drums and 1 drum of derived waste
Transfer Cell	1,003 ft <sup>2</sup> (93 m <sup>2</sup> )	31.4 ft <sup>3</sup> (0.89 m <sup>3</sup> )	1 canister
Facility Cask Loading Room	1,625 ft <sup>2</sup> (151 m <sup>2</sup> )	31.4 ft <sup>3</sup> (0.89 m <sup>3</sup> )	1 canister
<b>Total for RH Waste</b>	<b>17,403 ft<sup>2</sup></b> <b>(1,617 m<sup>2</sup>)</b>	<b>387.7 ft<sup>3</sup></b> <b>(11.0 m<sup>3</sup>)</b>	
<b>WHB Unit Total</b>	<b>49,710 ft<sup>2</sup></b> <b>(4,618 m<sup>2</sup>)</b>	<b>6,854 ft<sup>3</sup></b> <b>(194.1 m<sup>3</sup>)</b>	

**Table J-2  
 Parking Area Container Storage Unit**

Description	Area	Maximum Capacity	Container Equivalent
Parking Area	137,050 ft <sup>2</sup> (12,730 m <sup>2</sup> )	6,734 ft <sup>3</sup> (191 m <sup>3</sup> )	40 Contact-Handled Packages containing waste and 8 Remote-Handled Packages containing waste. The total number of Contact-Handled Packages containing waste in the Parking Area Unit cannot exceed 50.
Parking Area Surge Storage	Included in Parking Area	2,129 ft <sup>3</sup> (60 m <sup>3</sup> )	12 Contact-Handled Packages and 4 Remote-Handled Packages. The total number of Contact-Handled Packages containing waste in the Parking Area Unit cannot exceed 50.

**Table J-3  
 Underground Hazardous Waste Disposal Units**

Description <sup>1</sup>	Waste Type	Maximum Capacity <sup>2</sup>	Container Equivalent
Panel 1	CH TRU	636,000ft <sup>3</sup> (18,000 m <sup>3</sup> )	86,500 55-Gallon Drums
Panel 2	CH TRU	636,000 ft <sup>3</sup> (18,000 m <sup>3</sup> )	86,500 55-Gallon Drums
Panel 3	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	90,150 55-Gallon Drums
Panel 4	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	90,150 55-Gallon Drums
	RH TRU	12,570 ft <sup>3</sup> (356 m <sup>3</sup> )	400 RH TRU Canisters
Panel 5	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	90,150 55-Gallon Drums
	RH TRU	15,720 ft <sup>3</sup> (445 m <sup>3</sup> )	500 RH TRU Canisters
Panel 6	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	90,150 55-Gallon Drums
	RH TRU	18,860 ft <sup>3</sup> (534 m <sup>3</sup> )	600 RH TRU Canisters
Panel 7	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	90,150 55-Gallon Drums
	RH TRU	22,950 ft <sup>3</sup> (650 m <sup>3</sup> )	730 RH TRU Canisters
Panel 8	CH TRU	662,150 ft <sup>3</sup> (18,750 m <sup>3</sup> )	90,150 55-Gallon Drums
	RH TRU	22,950 ft <sup>3</sup> (650 m <sup>3</sup> )	730 RH TRU Canisters
<u>Panel 11</u>	<u>CH TRU</u>	<u>662,150 ft<sup>3</sup></u> <u>(18,750 m<sup>3</sup>)</u>	<u>90,150 55-Gallon Drums</u>
	<u>RH TRU</u>	<u>22,950 ft<sup>3</sup></u> <u>(650 m<sup>3</sup>)</u>	<u>730 RH TRU Canisters</u>
<u>Panel 12</u>	<u>CH TRU</u>	<u>662,150 ft<sup>3</sup></u> <u>(18,750 m<sup>3</sup>)</u>	<u>90,150 55-Gallon Drums</u>
	<u>RH TRU</u>	<u>22,950 ft<sup>3</sup></u> <u>(650 m<sup>3</sup>)</u>	<u>730 RH TRU Canisters</u>
<b>Total</b>	<b>CH TRU</b>	<del>5,244,900</del> <b>6,569,200</b> ft <sup>3</sup> <del>(148,500)</del> <b>186,000</b> m <sup>3</sup> )	<del>713,900</del> <b>894,200</b> 55-Gallon Drums
	<b>RH TRU</b>	<del>93,050</del> <b>138,950</b> ft <sup>3</sup> <del>(2,635)</del> <b>3,935</b> m <sup>3</sup> )	<del>2960</del> <b>4,420</b> RH TRU Canisters

- 
- <sup>1</sup> The area of each panel is approximately 124,150 ft<sup>2</sup> (11,533 m<sup>2</sup>).
  - <sup>2</sup> “Maximum Capacity” is the maximum volume of TRU mixed waste that may be emplaced in each panel. The maximum repository capacity of “6.2 million cubic feet of transuranic waste” is specified in the WIPP Land Withdrawal Act (Pub. L. 102-579, as amended) and is tracked and reported by the DOE internally as the LWA TRU Waste Volume. The LWA TRU Waste Volume is included for informational purposes in Permit Part 4, Table 4.1.1.

**ATTACHMENT K**  
**SOLID WASTE MANAGEMENT UNIT (SWMU) AND AREA OF CONCERN**  
**(AOC) TABLES**



## ATTACHMENT K

### SOLID WASTE MANAGEMENT UNIT (SWMU) AND AREA OF CONCERN (AOC) TABLES

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Table K-3	SWMUs & AOCs Requiring No Further Action (NFA)
Table K-4	Hazardous Waste Management Units

**Table K-1**  
**Solid Waste Management Units (SWMUs) & Areas of Concern (AOCs) Requiring Corrective Action**

<b>Unit ID Number</b>	<b>Unit Description</b>	<b>Comments</b>
Reserved	Reserved	

**Table K-2**  
**SWMUs & AOCs Corrective Action Complete With Controls**

<b>Unit ID Number</b>	<b>Unit Description</b>	<b>Comments</b>
Reserved	Reserved	

**Table K-3  
 SWMUs & AOCs Requiring No Further Action (NFA)**

<b>Unit ID Number</b>	<b>Unit Description</b>	<b>Comments</b>
SWMU 001g	H-14/P-1 Mud Pit (s)	NFA granted 10/23/2008
SWMU 001h	H-15/P-2 Mud Pit (s)	NFA granted 10/23/2008
SWMU 001j	P-3 Mud Pit	NFA granted 10/23/2008
SWMU 001k	P-4 Mud Pit	NFA granted 10/23/2008
SWMU 001l	WIPP-12/P-5 Drilling Mud Pit(s)	NFA granted 10/23/2008
SWMU 001m	P-6 Mud Pit	NFA granted 10/23/2008
SWMU 001n	P-15 Mud Pit	NFA granted 10/23/2008
SWMU 001o	Badger Unit Drilling Mud Pit(s)	NFA granted 10/23/2008
SWMU 001p	Cotton Baby Drilling Mud Pit(s)	NFA granted 10/23/2008
SWMU 001q	DOE-1 Drilling Mud Pit(s)	NFA granted 10/23/2008
SWMU 001s	ERDA-9 Mud Pit	NFA granted 10/23/2008
SWMU 001t	IMC-374 Mud Pit	NFA granted 10/23/2008
SWMU 001x	WIPP-13 Drilling Mud Pit(s)	NFA granted 10/23/2008
SWMU 004a	Portacamp Storage Yard, West Side	NFA granted 10/23/2008
SWMU 007b	SW Evaporation Pond	NFA granted 10/23/2008
AOC 001r	D-123 Mud Pit	NFA granted 10/23/2008
AOC 001u	IMC-376 Mud Pit	NFA granted 10/23/2008
AOC 001v	IMC-456 Mud Pit	NFA granted 10/23/2008
AOC 001w	IMC-457 Mud Pit	NFA granted 10/23/2008
AOC 001ac	DSP-207 Mud Pit	NFA granted 10/23/2008
AOC 001ae	IMC-377 Mud Pit	NFA granted 10/23/2008
AOC 010b	Waste Handling Shaft Sump	NFA granted 10/23/2008
AOC 010c	Exhaust Shaft Sump	NFA granted 10/23/2008

**Table K-4  
 Hazardous Waste Management Units**

<b>Unit ID Number</b>	<b>Unit Description</b>	<b>Comments</b>
SWMU 013a	Waste Handling Building Unit	
SWMU 013b	Parking Area Unit	
SWMU 013c	Underground Hazardous Waste Disposal Unit (HWDU) - Panel 1	This HWDU was closed May 2020.
SWMU 013d	Underground HWDU – Panel 2	This HWDU was closed May 2020.
SWMU 013e	Underground HWDU – Panel 3	This HWDU was closed August 2019.
SWMU 013f	Underground HWDU – Panel 4	This HWDU was closed August 2019.
SWMU 013g	Underground HWDU – Panel 5	This HWDU was closed August 2019.
SWMU 013h	Underground HWDU – Panel 6	This HWDU was closed August 2019.
SWMU 013i	Underground HWDU – Panel 7	
SWMU 013j	Underground HWDU – Panel 8	

**ATTACHMENT L**

**WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN**



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Table L-4	List of Culebra Wells in the WLMP, Current as of January 2022
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~~Figure L-14 — Groundwater Level Surveillance Wells (insert represents the groundwater surveillance wells in WIPP Land Withdrawal Area)~~

### LIST OF ABBREVIATIONS/ACRONYMS/UNITS

Bell Canyon bgs	Bell Canyon Formation below ground surface
Castile cm	Castile Formation centimeter(s)
Culebra	Culebra Member of the Rustler Formation
CofC/RFA	chain of custody/request for analysis
°C	degree(s) Celsius
%C	percent completeness
Dewey Lake	Dewey Lake Redbeds Formation
DI	deionized
DMP	Detection Monitoring Program
DMW	Detection Monitoring Well
DOE	U.S. Department of Energy
DQO	data quality objectives
EPA	U.S. Environmental Protection Agency
ft	foot (feet)
ft <sup>2</sup>	square foot (square feet)
<u>ft<sup>2</sup>/d</u>	<u>square feet per day</u>
g/cm <sup>3</sup>	gram(s) per cubic centimeter
HWDU	hazardous waste disposal unit(s)
km	kilometer(s)
km <sup>2</sup>	square kilometer(s)
<u>L</u>	<u>liter(s)</u>
lb/in. <sup>2</sup>	pound(s) per square inch
LCS	laboratory control samples
LCSD	lab control sample duplicate
Los Medaños	Los Medaños Member of the Rustler Formation
LWA	Land Withdrawal Act
m	meter(s)
M&DC	monitoring and data collection
m <sup>2</sup>	square meter(s)
Magenta	Magenta Member of the Rustler Formation
mg/L	milligram(s) per liter
mi	mile(s)
mi <sup>2</sup>	square mile(s)
<u>mL</u>	<u>milliliter(s)</u>
molal	moles per kilogram
MOC	Management and Operating Contractor
MPa	megapascal(s)

<del>m/s</del>	<del>meters per second</del>
<del>m<sup>2</sup></del>	<del>square meters</del>
<del>m<sup>2</sup>/s</del>	<del>square meters per second</del>
mV	millivolt(s)
NIST	National Institute for Standards and Technology
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
QA	<del>Quality-quality Assuranceassurance</del>
QA/QC	quality assurance/quality control
QAO	Quality Assurance Objective
QC	quality control
PABC	Performance Assessment Baseline Calculation
RCRA	Resource Conservation and Recovery Act
RPD	relative percent difference
Rustler	Rustler Formation
%R	percent recovery
Salado	Salado Formation
SAP	Sampling and Analysis Plans
SC	specific conductance
SOP	<del>Standard-standard Operating-operating Procedureprocedure</del>
TDS	total dissolved solids
TOC	total organic carbon
TRU	transuranic
TSDF	treatment, storage, and disposal facilities
UTLV	upper tolerance limit value
VOC	volatile organic compound
WIPP	Waste Isolation Pilot Plant
WLMP	WIPP Groundwater Level Monitoring Program
µg/L	microgram(s) per liter
µm	micrometers

## ATTACHMENT L

### WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN

#### L-1 Introduction

The Waste Isolation Pilot Plant (**WIPP**) facility is subject to regulation under Title 20 of the New Mexico Administrative Code (**NMAC**), Chapter 4, Part 1, ~~Subpart V~~ (20.4.1.500 NMAC). As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601), the Permittees shall demonstrate that the environmental performance standards for a miscellaneous unit, which are applied to the hazardous waste disposal units (**HWDUs**) in the underground, will be met.

The WIPP facility is located in Eddy County in southeastern New Mexico (Figure ~~L-4M-57~~), within the Pecos Valley section of the southern Great Plains physiographic province. The facility is 26 miles (mi) (42 kilometers [km]) east of Carlsbad, New Mexico, in an area known as Los Medaños (the dunes). Los Medaños is a relatively flat, sparsely inhabited plateau with little water and limited land uses.

The WIPP facility (Figure ~~L-2M-66~~) consists of 16 sections of ~~F~~federal land in Township 22 South, Range 31 East. The 16 sections of ~~F~~federal land were withdrawn from the application of public land laws by the WIPP Land Withdrawal Act (**LWA**), Public Law 102-579 (as amended). The WIPP LWA transferred the responsibility for the administration of the 16 sections from the Department of Interior, Bureau of Land Management, to the U.S. Department of Energy (**DOE**). This law specified that mining and drilling for purposes other than support of the WIPP project are prohibited within this ~~46-16~~-section area with the exception of Section 31. Oil and gas drilling activities are restricted in Section 31 from the surface down to 6,000 feet.

The WIPP facility includes a mined geologic repository for the disposal of transuranic (**TRU**) mixed waste. The disposal horizon is located 2,150 feet (ft) (655 meters [m]) below the land surface in the bedded salt of the Salado Formation (**Salado**). At the WIPP facility, water-bearing units occur both above and below the disposal horizon. Groundwater monitoring of the uppermost aquifer below the facility is not required because the water-bearing unit, which is ~~(the Bell Canyon Formation (**Bell Canyon**))~~, is not considered a credible pathway for a release from the repository. This is because the repository horizon and water-bearing sandstones of the Bell Canyon are separated by over 2,000 ft (610 m) of very low-permeability evaporite sediments (Amended Renewal Application Addendum L1 (DOE, 2009)). No natural credible pathway has been established for contaminant transport to water-bearing zones below the repository horizon, as there is no hydrologic communication between the repository and underlying water-bearing zones. The U.S. Environmental Protection Agency (**EPA**) concluded in 1990 that natural vertical communication does not exist based on review of numerous studies (EPA, 1990). Furthermore, drilling boreholes for groundwater monitoring through the Salado and the Castile Formation (**Castile**) into the Bell Canyon would compromise the isolation properties of the repository medium.

Groundwater monitoring at the WIPP facility focuses on the Culebra Member (**Culebra**) of the Rustler Formation (**Rustler**) because it represents the most significant hydrologic contaminant migration pathway to the accessible environment. The Culebra is the most significant transmissive water-bearing unit lying above the repository. Groundwater movement in the

1 Culebra, using based-on results from the basin-scale groundwater model, is discussed in detail  
2 in Amended Renewal Application Addendum L1, Section L1-2a, (DOE, 2009).

3 This monitoring plan addresses requirements for sample collection, Culebra groundwater  
4 surface elevation monitoring, Culebra groundwater flow direction and rate determination, data  
5 management, and reporting of Culebra groundwater monitoring data. It also identifies indicator  
6 parameters and hazardous constituents selected to assess Culebra groundwater quality for the  
7 WIPP ~~g~~Groundwater ~~e~~Detection ~~m~~Monitoring ~~p~~Program (**DMP**). Because quality assurance is  
8 an integral component of the groundwater sampling, analysis, and reporting process, quality  
9 assurance/quality control (**QA/QC**) elements and associated data acceptance criteria are  
10 included in this plan.

11 Procedures are required for each aspect of the Culebra groundwater monitoring and sampling  
12 processes, including Culebra groundwater surface elevation measurement, Culebra  
13 groundwater flow direction and rate determination, sampling equipment installation and  
14 operation, field water-quality measurements, and sample collection. Instructions for performing  
15 field activities that will be conducted in conjunction with this DMP are provided in the WIPP  
16 Standard Operating Procedures (**SOPs**) (see Table L-3), which are maintained in facility files  
17 and which comply with the applicable requirements of 20.4.1.500 NMAC (incorporating 40 CFR  
18 § 264.97 (d)). ~~Procedures are required for each aspect of the Culebra groundwater sampling~~  
19 ~~process, including Culebra groundwater surface elevation measurement, Culebra groundwater~~  
20 ~~flow direction and rate determination, sampling equipment installation and operation, field water-~~  
21 ~~quality measurements, and sample collection.~~ Data required by this plan will be collected by  
22 qualified personnel in accordance with SOPs (Table L-3).

## 23 L-1a Geologic and Hydrologic Characteristics

### 24 L-1a(1) Geology

25 The WIPP facility is situated within the Delaware Basin bounded to the north and east by the  
26 Capitan Reef, which is part of the larger Permian Basin, located in western Texas and  
27 southeastern New Mexico~~the south-central region of North America~~. Three major evaporite-  
28 bearing formations were deposited in the Delaware Basin (see Figures L-3M-67 and L-4M-68  
29 and Amended Renewal Application Addendum L1, Section L1-1 (DOE, 2009) for more detail):

- 30 • The Castile, which consists of interbedded anhydrites and halite. Its upper boundary is at  
31 a depth of about 2,825 ft (861 m) below ground surface (**bgs**), and its thickness at the  
32 WIPP facility is 1,250 ft (381 m).
- 33 • The ~~repository is located in the~~ Salado, which is the host formation of the repository and  
34 overlies the Castile and resulted from prolonged desiccation that produced  
35 predominantly halite, with some carbonates, anhydrites, and clay seams. Its upper  
36 boundary is at a depth of about 850 ft (259 m) bgs, and it is about 2,000 ft (610 m) thick  
37 in the repository area.
- 38 • The Rustler, Formation which was deposited in a lagoonal environment during a major  
39 freshening of the basin and consists of carbonates, anhydrites, and halites. Its beds  
40 consist of clay and anhydrite and contain small amounts of brine. The Rustler's upper  
41 boundary is about 500 ft (152 m) bgs, and it ranges up to 350 ft (107 m) in thickness in  
42 the repository area.

1 These evaporite-bearing formations lie between two other formations significant to the geology  
2 and hydrology of the WIPP facility. The Dewey Lake Redbeds Formation (**Dewey Lake**)  
3 overlying the Rustler is dominated by nonmarine sediments and consists almost entirely of  
4 mudstone, claystone, siltstone, and interbedded sandstone (see Amended Renewal Application  
5 Addendum L1, Section L1-1c(6) (DOE, 2009)). This formation forms a 500-ft- (152-m) thick  
6 barrier of fine-grained sediments that retard the downward percolation of water into the  
7 evaporite units below. The Bell Canyon is the first water-bearing unit below the repository (see  
8 Amended Renewal Application Addendum L1, Section L1-1c(2) (DOE, 2009)) and is confined  
9 above by the thick evaporite deposits of the Castile. It consists of 1,200 ft (366 m) of  
10 interbedded sandstone, shale, and siltstone.

11 The Salado was selected to host the WIPP repository for several reasons. First, it is regionally  
12 extensive, underlying an area of more than 36,000 square mi (**mi<sup>2</sup>**) (93,240 square kilometers  
13 [**km<sup>2</sup>**]). Second, its permeability is extremely low. Third, salt behaves mechanically in a plastic  
14 manner under pressure (the lithostatic pressure at the disposal horizon is approximately 2,200  
15 pounds per square inch [**lb/in.<sup>2</sup>**] or 14.9 megapascals [**MPa**]) and eventually deforms to fill any  
16 opening (referred to as creep). Fourth, any fluid remaining in small fractures or openings is  
17 saturated with salt, is incapable of further salt dissolution, and has probably remained in place  
18 since deposition. Finally, the Salado lies between the Rustler and the Castile (Figure **L-4M-68**),  
19 **both of** which contain very low-permeability layers that help confine and isolate waste within  
20 and keep water outside of the WIPP repository (see Amended Renewal Application Addendum  
21 L1, Section L1-1c(5) and L1-1c(3) (DOE, 2009)).

#### 22 L-1a(2) Groundwater Hydrology

23 The general hydrogeology of the area surrounding the WIPP facility is described in this section  
24 starting with the first geologic unit below the Salado. Addendum L1, Section L1-2a of **the**  
25 Amended Renewal Application (DOE, 2009) provides more detailed discussions of the local and  
26 regional hydrogeology. Relevant hydrological parameters for the various rock units above the  
27 Salado at **the WIPP facility** are summarized in Table L-1.

#### 28 L-1a(2)(i) The Castile

29 The Castile is a basin-filling evaporite sequence of sediments surrounded by the Capitan Reef.  
30 The Castile represents a major regional groundwater aquitard that effectively prevents upward  
31 migration of water from the underlying Bell Canyon. Fluid present in the Castile is very restricted  
32 because evaporites do not readily maintain pore space, solution channels, or open fractures at  
33 depth. Drill-stem tests conducted in the Castile during construction of the WIPP facility  
34 determined its permeability to be lower than detection limits; however, the hydraulic conductivity  
35 has been conservatively estimated to be less than  $10^{-8}$  ~~feet (ft) per day or~~  **$3.5 \times 10^{-9}$  meters**  
36 **per second (m/s)** ~~per day~~. A description of the Castile brine reservoirs outside the WIPP facility  
37 area is provided in Addendum L1, Section L1-2a(2)(b) of **the** Amended Renewal Application  
38 (DOE, 2009).

#### 39 L-1a(2)(ii) The Salado

40 The Salado is an evaporite sequence that filled the remainder of the Delaware Basin and lapped  
41 extensively over the Capitan Reef and the back-reef sediments beyond. The Salado consists of  
42 approximately 2,000 ft (610 m) of bedded halite, with interbeds or seams of anhydrite, clay, and  
43 polyhalite. It acts hydrologically as a regional confining bed. The porosity of the Salado is very

low and naturally interconnected pores are probably nonexistent in halite at the depth of the disposal horizon. Fluids associated with the Salado occur mainly as very small fluid inclusions in the halite crystals and also occur between crystal boundaries (interstitial fluid) of the massive crystalline salt formation; fluids also occur in clay seams and anhydrite beds. Permeabilities measured from the surface in the area of the WIPP facility range from 0.01 to 25 ~~microdarcy~~ ~~microdarcies~~  $(9.9 \times 10^{-17} \text{ square meters } [m^2])$ . The most reliable value, 0.3 microdarcy  $(3.0 \times 10^{-19} m^2)$ , was obtained from well DOE-2. The results of permeability testing at the disposal horizon are within the range of 0.001 to 0.01 microdarcy  $(9.9 \times 10^{-22} \text{ to } 9.9 \times 10^{-21} m^2)$ .

#### L-1a(2)(iii) The Rustler

The Rustler has been the subject of extensive characterization activities because it contains the most transmissive hydrologic units overlying the Salado. Within the Rustler, five members have been identified. Of these, the Culebra is the most transmissive and has been the focus of most of the Rustler hydrologic studies.

The Culebra is the first continuous water-bearing zone above the Salado and is up to approximately 30 ft (9 m) thick. Water in the Culebra is usually present in fractures and is confined by overlying gypsum or anhydrite and underlying clay and anhydrite beds. The hydraulic gradient within the Culebra in the area of the WIPP facility is approximately 20 ft per mi (3.8 m per km) and becomes much flatter south and southwest of the site (Figure ~~L-5M-69~~). Culebra transmissivities in the Nash Draw range up to 1,250 square ft (~~ft<sup>2</sup>~~) ~~per day (ft<sup>2</sup>/d)~~  $(1.3 \times 10^{-3} m^2 \text{ per second } (m^2/s))$  ~~146 square m [m<sup>2</sup>] per day~~; closer to the WIPP facility, they are as low as 0.007 to 74 ~~ft<sup>2</sup>/d~~  $(0.000657.5 \times 10^{-9} \text{ to } 8.0 \times 10^{-57.0} m^2/s)$  ~~per day~~.

The two primary types of field tests that are being used to characterize the flow and transport characteristics of the Culebra are hydraulic tests and tracer tests.

The hydraulic tests consist of pump, injection, and slug testing of wells across the study area (see Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 2009)). The most detailed hydraulic test data exist for the WIPP hydropads (e.g., H-19). The hydropads generally comprise a network of three or more wells located within a few tens of meters of each other. Long-term pumping tests have been conducted at hydropads H-3, H-11, and H-19 and at well WIPP-13 (see Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 2009)). These pumping tests provided transient pressure data both at the hydropad and over a much larger area. Tests often included use of automated data-acquisition systems, providing high-resolution (in both space and time) data sets. In addition to long-term pumping tests, slug tests and short-term pumping tests have been conducted at individual wells to provide pressure data that can be used to interpret the transmissivity at that well (see Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 2009)). Detailed cross-hole hydraulic testing has been conducted at the H-19 hydropad (see Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 2009)).

Pressure data ~~are~~ ~~were~~ collected during hydraulic tests for estimation of hydrologic characteristics such as transmissivity, permeability, and storativity. The pressure data from long-term pumping tests and the interpreted transmissivity values for individual wells ~~are~~ ~~were~~ used ~~to develop the conceptual model for incorporation into~~ ~~in calibration of~~ flow models. Some of the hydraulic test data and interpretations are also important for the interpretation of transport



1 characteristics. For instance, the permeability values interpreted from the hydraulic tests at a  
2 given hydropad ~~are~~were needed for interpretations of tracer test data at that hydropad.

3 There is strong evidence that the permeability of the Culebra varies spatially and varies  
4 sufficiently that it cannot be characterized with a uniform value or range over the region ~~of~~  
5 ~~interest to that affects the~~ WIPP facility. The transmissivity of the Culebra varies spatially over  
6 ten orders of magnitude from east to west in the vicinity of the WIPP facility. Transmissivities  
7 have been calculated at  $1 \times 10^{-7}$  ~~ft<sup>2</sup>/dsquare-foot-per-day~~ ( $1 \times 10^{-13}$  ~~m<sup>2</sup>/ssquare-meters-per~~  
8 ~~second~~) at well SNL-15 east of the WIPP site to  $1 \times 10^3$  ~~ft<sup>2</sup>/dsquare-foot-per-day~~ ( $1 \times 10^{-3}$   
9 ~~m<sup>2</sup>/ssquare-meters-per-second~~) at well H-7 in Nash Draw (see Amended Renewal Application  
10 Addendum L1, Section L1-2a(3)(a)(ii) (DOE, 2009)).

11 Transmissivity variations in the Culebra are believed to be controlled by the relative abundance  
12 of open fractures (secondary porosity) rather than by primary porosity (i.e. that is, depositional)  
13 ~~features~~ of the unit (Roberts, 2007). ~~Lateral variations in depositional environments were small~~  
14 ~~within the mapped region, and primary features of the Culebra show little map-scale spatial~~  
15 ~~variability, according to Holt and Powers, 1988. Direct measurements of the density of open~~  
16 ~~fractures are not available from core samples because of incomplete recovery and fracturing~~  
17 ~~during drilling, but observation of the relatively unfractured exposures in the WIPP shafts~~  
18 ~~suggests that the density of open fractures in the Culebra decreases to the east. Holt and~~  
19 ~~Powers (1988) examined available Culebra cores at and near the WIPP site and integrated~~  
20 ~~observations with shaft mapping at the site. These cores were not all complete through the~~  
21 ~~Culebra. Culebra thickness varies somewhat in the site area. The Culebra varies vertically, but~~  
22 ~~Holt and Powers (1988) described consistent sedimentary features across the area. The~~  
23 ~~Culebra did not reveal facies changes over the site and surrounding area that indicate changes~~  
24 ~~in depositional environments.~~

25 ~~Holt (1997) described transport processes through the Culebra, concluding that at the regional~~  
26 ~~scale the Culebra will behave as a double-porosity unit. Fractures were related to depth and~~  
27 ~~dissolution of underlying Salado halite by Holt (Holt and Yarbrough, 2002; Powers et al., 2003).~~  
28 ~~It was also noted by Holt (1997) that halite bounding the Culebra (especially to the east of the~~  
29 ~~WIPP site) was likely to further decrease the porosity of the Culebra. Culebra core from~~  
30 ~~monitoring well SNL-15 (Powers et al., 2006) provided evidence of halite filling Culebra porosity~~  
31 ~~where halite beds overlie and underlie the dolomite (Holt and Powers, 2010). Gypsum~~  
32 ~~precipitated in porosity in some areas of the Culebra may further decrease porosity (Beauheim~~  
33 ~~and Holt, 1990). The Culebra conceptual model was revised based on the relationship of~~  
34 ~~transmissivity to the three factors of overburden thickness, dissolution of salt from below the~~  
35 ~~Culebra, and the presence of halite below and above the Culebra (Holt et al., 2005).~~

36 Geochemical and radioisotope characteristics of the Culebra have been studied. There is  
37 considerable variation in groundwater geochemistry in the Culebra. The variation has been  
38 described in terms of different hydrogeochemical facies that can be mapped in the Culebra. A  
39 halite-rich hydrogeochemical facies exists in the region of the WIPP site and to the east,  
40 approximately corresponding to the regions in which halite exists in units above and below the  
41 Culebra, and in which a large portion of the Culebra fractures are gypsum filled. An anhydrite-  
42 rich hydrogeochemical facies exists west and south of the WIPP site, where there is relatively  
43 less halite in adjacent strata and where there are fewer gypsum-filled fractures. Radiogenic  
44 isotopic/isotopic signatures suggest that the age of the groundwater in the Culebra is on the  
45 order of 10,000 years or more (see Amended Renewal Application Addendum L1 (DOE, 2009)).

1 More recent data indicate Krypton-81 model ages on the order of 130,000 years for high-  
2 transmissivity zones of the Culebra (Sturchio et al., 2014)

3 The radiogenic ages of the Culebra groundwater and the geochemical differences provide  
4 information potentially relevant to the groundwater flow directions and groundwater interaction  
5 with other units and are important constraints on conceptual models of groundwater flow (see  
6 Renewal Application Addendum L1, Section L1-4b (DOE, 2020).

7 The Permittees have proposed a conceptualization of groundwater flow that explains observed  
8 geochemical facies and groundwater flow patterns. The conceptualization, referred to as the  
9 basin-scale groundwater model, offers a ~~three-three~~-dimensional approach to treatment of  
10 Supra-Salado rock units, and assumes vertical leakage (albeit very slow) between rock units of  
11 the Rustler exists (where a hydraulic head is present).

12 Flow in the Culebra is considered transient. The model assumes that the groundwater system is  
13 dynamic and is responding to ~~climate~~the drying of climate that has ~~persisted~~occurred since the  
14 late Pleistocene period. The Permittees assumed that recharge rates during the late Pleistocene  
15 period were sufficient to maintain the water table near land surface, but has since dropped  
16 significantly. Therefore, the impact of local topography on groundwater flow was greater during  
17 wetter periods, with discharge from the Rustler in the vicinity of the WIPP facility to the west  
18 toward Nash Draw; flow is currently dominated by more regional topographic effects during drier  
19 times, with flow in the Rustler from the vicinity of the WIPP facility towards the Balmorhea-  
20 Loving Trough to the south.

21 Using data from 22 wells, Siegel ~~et al., Robinson, and Myers~~ (1991) originally defined four  
22 hydrochemical ~~zones~~facies (A, B, C, and D) for Culebra groundwater based primarily on ionic  
23 strength and major constituents. With the data ~~now~~ available from 59 wells, Domski and  
24 Beauheim (2008) defined transitional A/C and B/C facies, as well as a new ~~facies~~Zone E for  
25 high-moles per kilogram (molal) Na-Mg Cl brines. These hydrochemical zones/facies include the  
26 following:

- 27 • Zone B - Dilute (ionic strength  $\leq 0.1$  molal)  $\text{CaSO}_4$ -rich groundwater, from southern high-  
28 transmissivity area. Mg/Ca molar ratio 0.32 to 0.52.
- 29 • ~~Zone-Facies~~ B/C - Ionic strength 0.18 to 0.29 molal, Mg/Ca molar ratio 0.4 to 0.6.
- 30 • Zone C - Variable composition waters, ionic strength 0.3 to 1.0 molal, Mg/Ca molar ratio  
31 0.4 to 1.1.
- 32 • ~~Zone-Facies~~ A/C - Ionic strength 1.1 to 1.6 molal, Mg/Ca molar ratio 0.5 to 1.2.
- 33 • Zone A - Ionic strength  $> 1.66$  molal, up to 5.3 molal, Mg/Ca molar ratio 1.2 to 2.4.
- 34 • Zone D - Defined based on inferred contamination related to potash refining operations.  
35 Ionic strength 3 molal, K/Na weight ratios of  $\sim 0.2$ .
- 36 • Zone E - Wells east of the mudstone-halite margins, ionic strength 6.4 to 8.6 molal,  
37 Mg/Ca molar ratio 4.1 to 6.6.

1 The low-ionic-strength ( $\leq 0.1$  molal) ~~facies Zone~~ B waters contain more sulfate than chloride, and  
2 are found southwest and south of the WIPP site within and down the Culebra hydraulic gradient  
3 from the southernmost closed catchment basins, mapped by Powers (2006), in the southwest  
4 arm of Nash Draw. These waters reflect relatively recent recharge through gypsum karst  
5 overlying the Culebra. However, with total dissolved solids (TDS) concentrations in excess of  
6 3,000 mg/L, the ~~facies Zone~~ B waters do not represent modern-day precipitation rapidly  
7 reaching the Culebra. They must have residence times in the Rustler sulfate units of thousands  
8 of years before reaching the Culebra.

9 The higher-ionic-strength (0.3-1 molal) ~~facies Zone~~ C brines have differing compositions,  
10 representing meteoric waters that have dissolved  $\text{CaSO}_4$ , overprinted with mixing and localized  
11 processes. ~~Facies Zone~~ A brines (ionic strength 1.6 - 5.3 molal) are high in NaCl and are  
12 clustered along the extent of halite in the middle of the Tamarisk Member of the Rustler  
13 Formation. ~~Facies Zone~~ A represents old waters (long flow paths) that have dissolved halite  
14 and/or connate brine, or a mixture of the two from ~~facies Zone~~ E. The ~~facies Zone~~ D brines, as  
15 identified by Siegel ~~et al., Robinson, and Myers~~ (1991), are high-ionic-strength solutions found  
16 in western Nash Draw with high K/Na ratios representing waters contaminated with effluent from  
17 potash refining operations. Similar water is found at shallow depth ( $< 36$  ft (11 m)) in the upper  
18 Dewey Lake at SNL-1, just south of the Intrepid East tailings pile. The newly defined ~~facies~~  
19 ~~Zone~~ E waters are very high ionic strength (6.4 - 8.6 molal) NaCl brines with high Mg/Ca ratios.  
20 The ~~facies Zone~~ E brines are found east of the WIPP site, where Rustler halite is present above  
21 and below the Culebra, and halite cements are present in the Culebra. They represent primitive  
22 brines present since deposition of the Culebra and immediately overlying strata.

23 ~~In a previous (earlier) conceptual model, the geochemistry of Culebra groundwater was not~~  
24 ~~correlated with flow direction. It was assumed the Zone~~~~Previously, the Permittees and others~~  
25 ~~believed the geochemistry of Culebra groundwater was inconsistent with flow directions. This~~  
26 ~~was based on the premise that facies C water must transform to Zone~~~~facies~~ B water (e.g.,  
27 become “fresher”), which is inconsistent with the observed flow direction. It is now believed that  
28 the observed geochemistry and flow directions can be explained with different recharge areas  
29 and Culebra travel paths (Amended Renewal Application Addendum L1 (DOE, 2009) and  
30 Renewal Application Addendum L1 (DOE, 2020)).

31 Head distribution in the Culebra (see Amended Renewal Application Addendum L1 (DOE, 2009)  
32 and Renewal Application Addendum L1 (DOE, 2020)) is now consistent with basin-scale  
33 groundwater basin modeling results indicating that the generalized groundwater flow direction in  
34 the Culebra is currently north to south. However, the fractured nature of the Culebra, coupled  
35 with variable fluid densities, can cause localized flow patterns to differ from general flow  
36 patterns.

37 Groundwater levels in the Culebra in the region around the WIPP facility have been measured  
38 in numerous wells. Water-level rises have been observed and are attributed to causes  
39 discussed in ~~the Amended~~ Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE,  
40 2009) and Renewal Application Addendum L1, Section L1-4d (DOE, 2020). The extent of  
41 ~~changes in water levels rise~~ observed at a particular well depends on several factors, but the  
42 proximity of the observation point to the cause of the water-level change appears to be a  
43 primary factor. Water level decreases have been observed due to anthropogenic causes, such  
44 as pumping water wells by a local rancher and well pumping from the oil and gas industry for  
45 hydraulic fracking (Thomas et al., 2017)

1 Hydrological investigations conducted from 2003 through 2007 provided new information, some  
2 of it confirming long-held assumptions and some offering new insight into the hydrological  
3 system around the WIPP site. A Culebra monitoring network optimization study was completed  
4 by McKenna (2004) and updated by Kuhlman (2010) to identify locations where new Culebra  
5 monitoring wells would be of greatest value and to identify wells that could be removed from the  
6 network with little loss of information.

7 As discussed in Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE,  
8 2009) and Renewal Application Addendum L1 (DOE, 2020), extensive hydrological testing has  
9 been performed in the new wells. This testing has involved both short-term single-well tests,  
10 which provide information on local transmissivity and heterogeneity, and long-term (19 to 32  
11 days) pumping tests that have created observable responses in wells up to 5.9 mi (9.5 km)  
12 away.

13 Inferences about vertical flow directions in the Culebra have been made from well data collected  
14 by the Permittees. Beauheim (1987) reported flow directions towards the Culebra from both the  
15 underlying Los Medaños Member (**Los Medaños**) of the Rustler and the overlying Magenta  
16 Member (**Magenta**) of the Rustler across the WIPP site, indicating that the Culebra acts as a  
17 drain for the units around it. This is consistent with results of basin-scale groundwater modeling.

18 Use of water from the Culebra in the WIPP facility area is quite limited because of its varying  
19 yields and high salinity. The Culebra is not used for water supply in the immediate WIPP facility  
20 vicinity. Its nearest use is approximately 7 mi (11 km) southwest of the WIPP facility, where  
21 salinity is low enough to allow its use for livestock watering.

## 22 L-2 General Regulatory Requirements

23 Because geologic repositories such as the WIPP facility are defined under the Resource  
24 Conservation and Recovery Act (**RCRA**) as land disposal facilities and as miscellaneous units,  
25 the groundwater monitoring requirements of 20.4.1.500 NMAC (incorporating 40 CFR  
26 §§264.600 through 264.603) shall be addressed. The requirements of 20.4.1.500 NMAC  
27 (incorporating 40 CFR §§264.90 through 264.101) apply to miscellaneous unit treatment,  
28 storage, and disposal facilities (**TSDF**) only if groundwater monitoring is needed to satisfy  
29 20.4.1.500 NMAC (incorporating 40 CFR §§264.601 through 264.603) environmental  
30 performance standards.

31 The New Mexico Environment Department (**NMED**) has concluded that groundwater monitoring  
32 in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §Part 264, Subpart F) at the WIPP  
33 facility is necessary to meet the requirements of 20.4.1.500 NMAC (incorporating 40 CFR  
34 §§264.601 through 264.603).

## 35 L-3 WIPP Detection Monitoring Program (DMP)—Overview

### 36 L-3a Scope

37 This DMP plan governs groundwater sampling events conducted to meet the applicable  
38 requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264 Subpart F) and ensures that  
39 such data are gathered in accordance with these and other applicable requirements. Analytical  
40 results collected during the DMP are compared to the baseline established in ~~this~~ Permit Part 5,  
41 Table 5.6 to determine whether or not a release has occurred.

1 There are two separate components of the Groundwater Monitoring Program, the **Detection**  
2 **Monitoring Program (DMP)** and the Water Level Monitoring Program (**WLMP**). The first  
3 component consists of a network of six Detection Monitoring Wells (**DMWs**). The DMWs  
4 (WQSP 1-6) were constructed to be consistent with the specifications provided in the  
5 Groundwater Monitoring Technical Enforcement Guidance Document and constitute the RCRA  
6 groundwater monitoring network specified in the DMP (**Figure M-69**). The DMWs were used to  
7 establish background groundwater quality in accordance with 20.4.1.500 NMAC (incorporating  
8 40 CFR §§ 264.97 and 264.98-(f)). The second component of the **Culebra** Groundwater  
9 Monitoring Program is the WLMP, which is used to determine the groundwater surface elevation  
10 and flow direction. Table L-4 is a list of the wells used in the WLMP. The list of wells is subject  
11 to change due to plugging and abandonment and drilling of new wells.

### 12 L-3b Current WIPP DMP

13 Wells WQSP-1, WQSP-2, and WQSP-3 are located ~~directly~~ upgradient (north) of the WIPP  
14 shaft area.

15 **Wells** WQSP-4, WQSP-5, and WQSP-6 are located downgradient (south) of the WIPP shaft  
16 area. All three Culebra downgradient wells (WQSP-4, -5, and -6) were sited to be located  
17 generally in the flow path of contaminants that might be released from the shaft area in the  
18 Culebra. Well WQSP-4 was also specifically located to monitor the zone of higher  
19 transmissivity, which may represent a faster flow path away from the WIPP shaft area to the  
20 LWA boundary (Amended Renewal Application Addendum L1, Section L1-2a(3)(a)(ii) (DOE,  
21 2009)).

22 The compliance point is defined in 20.4.1.500 NMAC (incorporating 40 CFR §264.95) as the  
23 vertical plane immediately downgradient of the hazardous waste management unit area (i.e., at  
24 the downgradient footprint of the WIPP repository). Permit Part 5 specifies the point of  
25 compliance as “the vertical surface located at the hydraulically downgradient limit of the  
26 Underground HWDUs that extends to the Culebra Member of the Rustler Formation.” Wells  
27 WQSP-4, 5, and 6 are situated to demonstrate that during the operating life of the facility  
28 (including closure), there will be no releases of hazardous waste constituents that may have an  
29 adverse effect on human health and the environment due to the migration of waste constituents  
30 in the groundwater or subsurface environment-release of contaminants to the general public will  
31 not occur.

32 Transport modeling suggests that travel times from the Waste Handling Shaft to the LWA  
33 boundary could be on the order of thousands of years. This assumes conditions where  
34 hazardous constituents migrate from the sealed repository (post closure) to the Culebra via the  
35 sealed shafts.

36 Potentiometric surfaces and groundwater flow directions defined for the Culebra prior to large-  
37 scale pumping in the WIPP facility area and the excavation of WIPP facility shafts suggests that  
38 flow was generally to the south-southeast from the waste disposal and shaft areas (Mercer,  
39 1983; Davies, 1989). Potentiometric surface maps of the Culebra adjusted for density  
40 differences show very similar characteristics. Water levels used to determine~~The wells used for~~  
41 ~~measuring~~ the potentiometric surface of the Culebra are measured monthly and listed in Table  
42 L-4.



1 L-3b(1) Detection Monitoring Well Construction Specification

2 Diagrams of the six DMP wells are shown in Figures L-7M-71 through L-12M-76. Detailed  
3 descriptions of geology and construction methods ~~may be~~are found in DOE (1995).

4 The six DMP Culebra wells were drilled between September 13 and October 16, 1994. The total  
5 depth of each well is shown in Table L-5. The wells were drilled through the Culebra into the  
6 Los Medaños as shown in Table L-5. The wells were drilled to the top of the Culebra using  
7 compressed air as the drilling fluid and a 9 $\frac{7}{8}$ -in. drill bit. The wells were then cored using a 5 $\frac{1}{4}$ -  
8 in. core bit to cut 4-in. (0.1-m) diameter core to total depth. See Table L-5 for the drilling and  
9 coring intervals for each well. After coring, DMP wells were reamed to 9 $\frac{7}{8}$  -in. (0.3 m) in  
10 diameter to total depth. After reaming, wells were cased from the surface to total depth with 5-in.  
11 (0.1-m) (0.28-in. [0.7-centimeter (**cm**)] wall) blank fiberglass casing with in-line 5-in.- (0.1-m)  
12 diameter fiberglass 0.02-in. (0.1-cm) slotted screen across the Culebra interval as shown in  
13 Table L-5 . The annulus between the borehole wall and the casing/screen is packed from total  
14 depth to surface with ~~sand and with~~ 8/16 Brady gravel, followed by sand, bentonite, and cement  
15 as indicated in Table L-5.

16 L-4 Monitoring Program Description

17 The WIPP DMP has been designed to meet the groundwater monitoring requirements of  
18 20.4.1.500 NMAC (incorporating 40 CFR §§264.90 through 264.101). The following sections of  
19 the monitoring plan specify the components of the DMP.

20 L-4a Monitoring Frequency

21 Groundwater surface elevations ~~will be~~are monitored in each of the six DMWs on a monthly  
22 basis. The groundwater surface elevation in each DMW ~~will also be~~are measured prior to each  
23 annual sampling event. The groundwater surface elevation measurements in the WLMP wells  
24 ~~are will also be~~are monitored on a monthly basis when accessible. The characteristics of the DMW  
25 (sampling frequency, location) ~~will be~~are evaluated if for significant changes ~~are observed~~  
26 in the groundwater flow direction or gradient.

27 L-4b Analytical Parameters and Hazardous Constituents

28 The parameters listed in Permit Part 5, Table 5.4.a, and hazardous constituents listed in Permit  
29 Part 5, Table 5.4.b, are measured as part of the DMP.

30 Additional hazardous constituents may be identified through changes to the list of hazardous  
31 waste numbers authorized for disposal at the WIPP facility. If hazardous constituents are  
32 identified, these will be added to Permit Part 5, Table 5.4.b, unless the Permittees provide  
33 justification for their omission (e.g. hazardous constituent not in 40 CFR §Part 264, Appendix  
34 IX), and this omission is approved by the NMED.

35 L-4c Groundwater Surface Elevation Measurement, Sample Collection and Laboratory  
36 Analysis

37 Groundwater surface elevations will be measured in each DMW prior to groundwater sample  
38 collection. ~~Groundwater will be extracted using serial and final sampling methods. Serial~~  
39 ~~samples~~Data will be collected until groundwater field indicator parameters stabilize or three well

1 bore volumes, whichever occurs first, after which the final sample for complete analysis will be  
2 collected. Final samples will then be analyzed for the parameters and constituents in Permit  
3 Part 5, Tables 5.4.a and 5.4.b.

4 L-4c(1) Groundwater Surface Elevation Monitoring Methodology

5 The ~~WIPP groundwater level monitoring program (WLMP)~~ WLMP activities are conducted in  
6 accordance with the WIPP facility SOPs listed in Table L-3.

7 Groundwater surface elevation measurements will be taken monthly at each of the six DMWs  
8 and prior to the annual sampling event. Additionally, groundwater surface elevation  
9 measurements will be taken monthly in the other Culebra wells as listed in Table L-4, when  
10 accessible. Well locations are shown in Figure ~~L-14M-77~~. If a cumulative groundwater surface  
11 elevation change of more than 2 feet is detected in any DMP well over the course of one year  
12 ~~which, and the change in elevation~~ is not attributable to site tests or natural stabilization of the  
13 site hydrologic system, the Permittees will notify the NMED in writing and discuss the origin of  
14 the changes in the Annual Culebra Groundwater Report specified in Permit Part 5. Abnormal,  
15 unexplained changes in groundwater surface elevation will be evaluated to determine if they  
16 indicate changes in site recharge/discharge, which could affect the assumptions regarding  
17 DMW placement and constitute new information as specified in 20.4.1.900 NMAC (incorporating  
18 40 CFR §270.41(a)(2)).

19 Groundwater surface elevation monitoring will continue through the post-closure care period  
20 specified in Permit Part 7. The Permittees may temporarily increase the frequency of monitoring  
21 to effectively document naturally occurring or artificial perturbations that may be imposed on the  
22 hydrologic systems at any point in time. This will be conducted in selected key wells by  
23 increasing the frequency of the manual groundwater surface elevation measurements or by  
24 monitoring water pressures with the aid of electronic pressure transducers and remote data-  
25 logging systems. The Permittees will include such additional data in the reports specified in  
26 Section L-5c.

27 Interpretation of groundwater surface elevation measurements and corresponding fluctuations  
28 over time is complicated at the WIPP facility by spatial variation in fluid density. To monitor the  
29 hydraulic gradients of the hydrologic flow systems accurately, actual groundwater surface  
30 elevation measurements will be monitored at the frequencies specified in Table L-2, and the  
31 Culebra groundwater densities, ~~of the fluids~~ in the wells listed in Table L-4, will be calculated  
32 ~~measured~~ annually. The fluid density ~~calculated formeasured at~~ well H-19b0 will be used to  
33 correct for freshwater head for the other wells on H-19 pad (H-19b2, H-19b3, H-19b4, H-19b5,  
34 H-19b6, and H-19b7).

35 Measured Culebra water surface elevation data can be converted to equivalent freshwater head  
36 from knowledge of the density of the borehole fluid, using the following formula.

37 
$$\rho = \rho_{\gamma} h$$

38 where

39  $\rho$  = freshwater head (length of freshwater head)

40  $\rho_{\gamma}$  = average specific gravity of the borehole fluid (unitless ratio of borehole fluid density to  
41 density of fresh water)



1  $\rho_p$  = freshwater density (mass/volume)  
2 h = fluid column height above the datum (length)

3 ~~If the freshwater density is assumed to be 1.000 gram per cubic centimeter (g/cm<sup>3</sup>), then the~~  
4 ~~equivalent freshwater head is equal to the fluid column height times the average borehole fluid~~  
5 ~~specific gravity.~~

6 Density ~~calculations~~measurements are ~~performed~~ made annually. Density for the DMWs will be  
7 expressed as specific gravity as measured in the field during sampling events using a  
8 hydrometer. Freshwater head for other Culebra wells will be calculated as described above from  
9 fluid density measurements obtained using pressure transducers.

10

11 L-4c(1)(i) Field Methods and Data Collection Requirements

12 To obtain an accurate groundwater surface elevation measurement, a calibrated water-level  
13 measuring device will be lowered into a test well and the depth to water recorded from a known  
14 reference point. An SOP will be used when making water-level measurements for this program.  
15 The SOP will specify the methods to be used in obtaining groundwater-level measurements,  
16 and provide general instructions including prerequisites, safety precautions, performance  
17 frequency, quality assurance, data management, and records.

18 L-4c(1)(ii) Groundwater Surface Elevation Records and Document Control

19 ~~Incoming~~ Groundwater surface elevation measurement data will be processed in a manner that  
20 ensures data integrity. The data management process for groundwater surface elevation  
21 measurements data will begin with completion of the field data sheets. Date, time, tape  
22 measurement, unique equipment identification number, ~~calibration due date~~, initials of the field  
23 personnel, and equipment/comments will be recorded on the field data sheets. If, for some  
24 unexpected reason, a measurement is not possible (e.g., a test is under way that blocks entry to  
25 the well bore), then a notation as to why the measurement was not taken will be recorded in the  
26 comment column. Personnel will also use the comment column to report any security  
27 observations (~~i.e.e.g.~~, well lock missing, casing damage).

28 Data recorded on the field data sheets and submitted by field personnel will be subject to  
29 applicable SOPs (see Table L-3). These procedures specify the processes for administering  
30 and managing such data. The data will be entered onto a computerized work sheet. The work  
31 sheet program calculates groundwater surface elevation in both feet and meters relative to the  
32 top of the casing and also relative to mean sea level. The work sheet program adjusts  
33 groundwater surface elevations to equivalent freshwater heads.

34 A check print will be made of the work sheet printout. The check print will be used to verify that  
35 data taken in the field ~~was~~ were properly reported on the database printout. A minimum of 10  
36 percent of the spreadsheet calculations will be randomly verified on the check print to ensure  
37 that calculations are being performed correctly. If errors are found, the work sheet will be  
38 corrected. Groundwater surface elevation data and equivalent freshwater heads for the Culebra  
39 wells in Table L-4 will be transmitted to the NMED by May 31 and November 30. Semi-annual  
40 groundwater reports will also include annotated hydrographs and trend analysis.

1 L-4c(2) Groundwater Sampling

2 L-4c(2)(i) Groundwater Pumping and Sampling Systems

3 The groundwater pumping and sampling systems used to collect a groundwater sample from  
4 the six DMWs will provide continuous and adequate production of water so that a representative  
5 groundwater sample can be obtained.

6 The type of pumping and sampling system to be used in a well depends primarily on the aquifer  
7 characteristics of the Culebra and well construction. The DMWs are individually equipped with  
8 dedicated submersible pumping assemblies. Each well has a ~~specific type of~~ submersible  
9 pump, matched to the ability of the well to yield water during pumping. The down-hole  
10 submersible pumps are controlled by a variable electronic flow controller to match the  
11 production capacity of the formation at ~~each the~~ well.

12 As recommended in the "RCRA Ground-Water Monitoring Technical Enforcement Guidance  
13 Document" (EPA, 1986) the wells will be purged no more than three well bore volumes or until  
14 field indicator parameters have stabilized, whichever comes first. Well purging will be performed  
15 in accordance with an SOP in conjunction with serial sampling field parameter analysis to  
16 determine when the groundwater chemistry stabilizes and is therefore representative of  
17 undisturbed groundwater.

18 The DMWs are cased and screened through the production interval with materials (fiberglass-  
19 reinforced plastic) that do not yield contamination to the aquifer or allow the production interval  
20 to collapse under stress (~~high epoxy fiberglass~~). An electric, submersible pump installation  
21 without the use of a packer is used in this instance. The largest amount of discharge from the  
22 submersible pump takes place from a discharge pipe. In addition to this main discharge pipe, a  
23 dedicated sample line running parallel to the discharge pipe is used. The sampling line is  
24 manufactured from a chemically inert material. Cumulative flow is measured using a totalizing  
25 flow meter. Flow from the discharge pipe is routed to a discharge tank for disposal.

26 The dedicated sampling line is used to collect the water sample that will undergo analysis. By  
27 using a dedicated sample line, the water will not be contaminated by the metal discharge pipe.  
28 The sample line will branch from the main discharge pipe a few inches above the pump. Flow  
29 from the sample line will be routed into the sample collection area. Flow through the sample  
30 collection line is regulated by a flow-control valve. The sample line is insulated at the surface to  
31 minimize temperature fluctuations.

32 L-4c(2)(ii) Serial Samples Field Parameter Analysis

33 Serial sampling Field parameter analysis is the collection measurement of data from  
34 temperature, specific conductivity, and pH meters installed in a flow-through cell for sequential  
35 samples for the purpose of determining when the groundwater chemistry stabilizes and is  
36 therefore representative of undisturbed groundwater. The Permittees' SOP for serial  
37 sampling field parameter analysis will provide criteria for determining when a final sample should  
38 be taken. Each DMW will be purged to no than more three well bore volumes, or until field  
39 parameters stabilize, whichever occurs first. Well stabilization occurs when the field-analyzed  
40 parameters are within  $\pm 5\%$  of for three consecutive measurements. A well bore volume is  
41 defined as the volume of water from static water level to the bottom of the well sump. Serial  
42 samples will be analyzed in the mobile filed laboratory for field indicator parameters. The

1 Permittees will provide an explanation of why the sample was collected when field indicator  
2 parameters were not stabilized and place that explanation in the WIPP facility Operating  
3 Record.

4 ~~Serial samples~~Field parameters will be ~~collected and~~ analyzed to detect and monitor the  
5 chemical variation of the groundwater as a function of the volume of water pumped. Once serial  
6 sampling data collection begins, the duration frequency at which serial samples field parameters  
7 are ~~collected and~~ analyzed will be left to the discretion of the Permittees, ~~but will be performed a~~  
8 ~~minimum of three times during a sampling round.~~

9 The Permittees will use appropriate field methods to identify stabilization of the following field  
10 indicator parameters: pH, temperature, specific conductance (SC), and specific gravity.

11 The three field indicator parameters of temperature, specific conductance, and pH will be  
12 determined by either an “in-line” technique, using a self-contained flow cell, or an “off-line”  
13 technique, in which the samples will be collected from a sample line at atmospheric pressure.  
14 ~~Specific conductance and specific gravity samples will be collected from the sample line at~~  
15 ~~atmospheric pressure.~~ Because of the lack of sophisticated weights and measures equipment  
16 available for field density assessments, field density evaluations will be expressed in terms of  
17 specific gravity, which is a unitless measure. Density is expressed as unit weight per unit  
18 volume.

19 New polyethylene containers, that are certified clean by the laboratory, will be used to collect  
20 the serial final samples from the sample line.

21 ~~Serial samples collected in laboratory certified clean containers do not require rinsing prior to~~  
22 ~~sample collection. Unfiltered groundwater will be used when determining temperature, pH,~~  
23 ~~specific conductance, and specific gravity. Sample bottles will be properly identified and labeled.~~

24 ~~Samples collected will immediately be analyzed for pH and specific conductance (SC) as these~~  
25 ~~parameters are most sensitive to changes in ambient temperature. Temperature, pH, and~~  
26 ~~specific conductance, when not measured in a flow cell, will be measured at the approximate~~  
27 ~~time of serial sample collection. These samples will be collected from the unfiltered sample line.~~

28 ~~Upon completion of the collection of the last serial sample suite, the serial sample bottles~~  
29 ~~accrued throughout the duration of the pumping of the well will be discarded. No serial sample~~  
30 ~~bottles will be reused for sampling purposes of any sort. However, serial samples may be stored~~  
31 ~~for a period of time depending upon the need. Standard Operating Procedures (see Table L-3)~~  
32 ~~defines the protocols for the collection of final and serial samples and analysis.~~

### 33 L-4c(2)(iii) Final Samples

34 The final sample will be collected once the measured field indicator parameters have stabilized  
35 (refer to Section L-4(c)(2)(ii)). ~~A serial sample~~Collected data will ~~also be collected and~~ analyzed  
36 for each day of pumping until final sampling. This is to ensure that samples collected for  
37 laboratory analysis are still representative of stable conditions. Sample preservation, handling,  
38 and transportation methods will maintain the integrity and representativeness of the final  
39 samples.

1 Prior to collecting the final samples, the collection team shall consider the analyses to be  
2 performed so that proper shipping or storage containers can be assembled. Table L-6 presents  
3 the sample containers, volumes, and holding times for laboratory samples collected as part of  
4 the DMP.

5 The monitoring system will use dedicated pumping systems and sample collection lines from the  
6 sampled formation to the well head.

7 Sample integrity will be ensured through appropriate decontamination procedures. Laboratory  
8 glassware will be washed after each use with a solution of nonphosphorus detergent and  
9 deionized (DI) water and rinsed in DI water. Sample containers will be new, certified clean  
10 containers that will be discarded after one use. Groundwater surface elevation measurement  
11 devices will be rinsed with fresh water after each use. Non-dedicated sample collection manifold  
12 assemblies will be rinsed in accordance with SOPs after each use. The exposed ends will be  
13 capped off during storage. Prior to the next use of the sampling manifold, it will be rinsed a  
14 second time with DI water ~~and a rinsate blank sample will be collected to verify cleanliness.~~

15 Water samples will be collected at atmospheric pressure using either the filtered or unfiltered  
16 sampling lines. Detailed protocols, in the form of SOPs (see Table L-3) define how final samples  
17 will be collected in a consistent and repeatable fashion for analyses.

18 Final samples will be collected in the appropriate type of container for the specific analysis to be  
19 performed. The samples will be collected in new and unused glass and plastic containers (refer  
20 to Table L-6). For each parameter analyzed, a sufficient volume of sample will be collected to  
21 satisfy the volume requirements of the analytical laboratory (as specified by laboratory SOPs).  
22 This includes an additional volume of sample water necessary for maintaining quality control  
23 standards. ~~All final~~Final samples will be treated, handled, and preserved as required for the  
24 specific type of analysis to be performed. Details about sample containers, preservation, and  
25 volumes required for individual types of analyses are found in the applicable SOPs generated,  
26 approved, and maintained by the contract analytical laboratory.

27 Final samples will be sent to the analytical laboratories and analyzed for parameters and  
28 hazardous constituents specified in Permit Part 5, Tables 5.4.a and 5.4.b.

29 Duplicates of the final sample will be provided to WIPP Project oversight agencies when  
30 requested.

31 Wastes resulting from the sampling and field analysis of groundwater are disposed of in  
32 accordance with the WIPP SOPs (see Table L-3).

#### 33 L-4c(2)(iv) Sample Preservation, Tracking, Packaging, and Transportation

34 Many of the chemical constituents measured by the DMP are not chemically stable and require  
35 preservation and special handling techniques. Samples requiring acidification will be treated as  
36 requested by the analytical laboratory.

37 The analytical laboratory receiving the samples will prescribe the type and amount of  
38 preservative, the container material type, the required sample volumes that shall be collected,  
39 and the shipping requirements. This information will be recorded on the Final Sample Checklist  
40 for use by field personnel when final samples are being collected. The Permittees will follow the

1 EPA “RCRA Ground-Water Monitoring Technical Enforcement Guidance Document,” Table 4-1  
2 (EPA, 1986), when laboratory SOPs do not specify sample container, volume, or preservation  
3 requirements. ~~WIPP Waste Isolation Pilot Plant~~ SOPs (see Table L-3) provide instructions to  
4 ensure proper sample preservation and shipping.

5 The sample tracking system at the WIPP facility uses uniquely numbered chain of custody/  
6 request for analysis (**CofC/RFA**) forms. The primary consideration for storage or transportation  
7 is that samples shall be analyzed within the prescribed holding times for the analytes of interest.  
8 WIPP SOPs (see Table L-3) provide instructions to ensure proper sample tracking protocol.

#### 9 L-4c(2)(v) Sample Documentation and Custody

10 To ensure the integrity of samples from the time of collection through reporting date, sample  
11 collection, handling, and custody shall be documented. Sample custody and documentation  
12 procedures for sampling and analysis activities are detailed in WIPP facility SOPs (see Table L-  
13 3).

14 Standardized forms used to document samples will include sample identification numbers,  
15 sample labels, custody tape, the sample tracking data, and CofC/RFA form. ~~An example form is~~  
16 ~~shown in Figure L-13.~~

#### 17 Sample Numbers and Labels

18 A unique sample identification number will be assigned to each sample sent to the laboratory for  
19 analysis. The sample identification numbers will be used to track the sample from the time of  
20 collection through data reporting. Every sample container sent to the laboratory for analysis will  
21 be identified with a label affixed to it. Sample label information will be completed in indelible ink  
22 and will contain the following information: sample identification number with sample matrix type;  
23 sample location; analysis requested; time and date of collection; preservative(s), if any; and the  
24 sampler’s name or initials.

#### 25 Custody Seals

26 Custody seals ~~or custody tape~~ will be used to detect unauthorized sample tampering from  
27 collection through analysis. For example, custody seals that are adhesive-backed strips are  
28 destroyed when removed or when the container is opened. The seal will be dated, initialed, and  
29 affixed to the sample container in such a manner that it is necessary to break the seal to open  
30 the container. Seals will be affixed to sample containers in the field immediately after collection.  
31 Upon receipt at the laboratory, the laboratory custodian will inspect the seal for integrity; a  
32 broken seal will invalidate the sample.

#### 33 Sample Identification and Tracking

34 Sample tracking information will be completed for each sample collected. The sample tracking  
35 information includes the following information: CofC/RFA form number; date sample(s) were  
36 sent to the lab; laboratory name; acknowledgment of receipt or comments; well name and round  
37 number. Sample codes will indicate the well location; the geologic formation where the water  
38 was collected from, the sampling round number; and the sample number. The code is broken  
39 down as follows:

1 WQ6<sup>1</sup>C<sup>2</sup>R2<sup>3</sup>N1<sup>4</sup>

- 2 <sup>1</sup> Well identification (e.g., WQSP-6 in this case)  
3 <sup>2</sup> Geologic formation (e.g., the Culebra in this case)  
4 <sup>3</sup> Sample round no. (Round 2)  
5 <sup>4</sup> Sample no. (N1)

6 To distinguish duplicate samples from other samples, a “D” is added as the last digit to signify a  
7 duplicate. Sample tracking information will be completed in the field by the sampling team.

8 Sample tracking is monitored and documented with the CofC/RFA form and the shipping airbill.  
9 Both of these documents are included in the data packets. Receipt at the analytical laboratory  
10 may be monitored, if necessary, via the shipper’s website tracking application. Samples are  
11 considered complete when a copy of the original CofC/RFA form is merged with the Field-Lab  
12 copy of the same document.

13 Chain of Custody and Request for Analysis

14 A CofC/RFA form will be completed during or immediately following sample collection and will  
15 accompany the sample through analysis and disposal. The CofC/RFA form will be signed and  
16 dated each time the sample custody is transferred. A sample will be considered to be in a  
17 person’s custody if: the sample is in his/her physical possession; the sample is in his/her  
18 unobstructed view; and/or the sample is placed, by the last person in possession of it, in a  
19 secured area with restricted access. During shipment, the carrier’s air bill number serves as  
20 custody verification. Upon receipt of the samples at the analytical laboratory, the laboratory  
21 sample custodian acknowledges possession of the samples by signing and dating the  
22 CofC/RFA form. The completed original (top page) of the CofC/RFA will be returned to the  
23 Permittees with the laboratory analytical report and becomes part of the permanent record of  
24 the sampling event. The CofC/RFA form also contains specific instructions to the analytical  
25 laboratory for sample analysis, potential hazards, and disposal instructions.

26 L-4c(3) Laboratory Analysis

27 Analysis of samples will be performed using methods selected to be consistent with EPA  
28 recommended procedures in SW-846 (EPA, 2015-1996). Additional detail on analytical  
29 techniques and methods will be given in laboratory SOPs. In Permit Part 5, Tables 5.4.a and  
30 5.4.b presents the analytical parameters and hazardous constituents for the WIPP DMP.

31 The Permittees will establish the criteria for laboratory selection, including the stipulation that  
32 the laboratory follow the procedures specified in SW-846 and that the laboratory follow EPA  
33 protocols unless alternate methods or protocols are approved by the NMED. The analytical  
34 laboratory shall demonstrate, through laboratory SOPs that it will follow appropriate EPA  
35 SW-846 requirements and the requirements specified by the EPA protocols unless alternate  
36 methods or protocols are approved by the NMED. The analytical laboratory shall also provide  
37 documentation to the Permittees describing the sensitivity of laboratory instrumentation. This  
38 documentation will be retained in the WIPP facility Operating Record. Instrumentation sensitivity  
39 needs to be considered because of regulatory requirements governing constituent  
40 concentrations in groundwater and the complexity of brines associated with the Culebra  
41 groundwater.



1 The laboratory will maintain documentation of sample handling and custody, analytical results,  
2 and internal ~~quality control (QC)~~QC data. Additionally, the laboratory will analyze QC samples in  
3 accordance with this plan and its own internal QC program for indicators of analytical accuracy  
4 and precision. Data generated outside of laboratory acceptance limits will trigger an evaluation  
5 and, if appropriate, corrective action as directed by the Permittees. The laboratory will report the  
6 results of the environmental sample and QC sample analyses and any necessary corrective  
7 actions that were performed. In the event that more than one analytical laboratory is used (e.g.,  
8 for different analyses), each one will have the responsibilities specified above. A copy of the  
9 laboratory SOPs will be maintained in WIPP facility files. The Permittees will provide the NMED  
10 with an initial set of applicable laboratory SOPs for information purposes, and provide the  
11 NMED with ~~any~~ updated SOPs ~~on an annual basis by January 31~~upon request.

12 Data validation will be performed and reported in the Annual Culebra Groundwater Report and  
13 will be maintained in the WIPP facility Operating Record.

#### 14 L-4d Calibration

##### 15 L-4d(1) Sampling and Groundwater Elevation Monitoring Equipment Calibration

16 The equipment used to collect data for this DMP will be calibrated in accordance with SOPs.  
17 The Permittees will be responsible for calibrating needed equipment on schedule and for  
18 maintaining current calibration records for each piece of equipment.

##### 19 L-4d(2) Groundwater Surface Elevation Monitoring Equipment Calibration Requirements

20 The equipment used in taking groundwater surface elevation measurements will be maintained  
21 in accordance with WIPP facility SOPs (see Table L-3). The Permittees will be responsible for  
22 ensuring equipment is calibrated on schedule in accordance with SOPs. The Permittees will  
23 also be responsible for maintaining copies of records of the most recent calibration for each  
24 piece of equipment.

#### 25 L-4e Statistical Analysis of Laboratory Analytical Data

26 Analytical data collected as part of the DMP will be evaluated using appropriate statistical  
27 techniques. The following specifies the statistical analysis to be performed by the Permittees.

##### 28 L-4e(1) Temporal and Spatial Analysis

29 Temporal and spatial analyses of the data were completed as part of establishing the water  
30 quality baseline (Crawley and Nagy, 1998; IT, 2000). As a result, the Permittees determined to  
31 evaluate changes relative to baseline on an individual location basis and to report the  
32 concentrations of constituents as a time series, either in tabular form or as time plots. No  
33 particular seasonal variations have been noted in the concentrations of groundwater samples  
34 collected during the spring and autumn; therefore, continuing temporal analysis is not required.

35 The analytical results for constituents will be reported as time series, either in tabular form or as  
36 time plots or both, and compared to the 95th percentile values or reporting limits identified in  
37 Permit Part 5, Table 5.6.



#### 1 L-4e(2) Distributions and Descriptive Statistics

2 Techniques were established to compare detection monitoring data generated during the  
3 baseline studies. A 95th upper tolerance limit value (**UTLV**) or 95th percentile was determined  
4 from those data sets where target analytes were measured at concentrations above the method  
5 detection limits. The UTLV is provided for normal or lognormal distributions and a 95th percentile  
6 confidence interval is provided for data sets that are nonparametric or have greater than 15  
7 percent non-detects. For analytes with only a few detects (greater than 95 percent non-detects),  
8 an accurate 95th percentile cannot be calculated. For these analytes, the maximum detected  
9 concentration is used as the baseline value. For the analytes that are non-detect in all the  
10 samples, the method reporting limit was used as the baseline value.

#### 11 L-4e(3) Action Levels

12 Using baseline distributions, actions levels were identified in accordance with methodologies  
13 described in the baseline documents. Action levels are based on the 95th percentile or reporting  
14 limits identified in the baseline. If the groundwater concentration of a constituent identified in  
15 Permit Part 5, Table 5.6, is found to exceed an action level, a test for outliers is performed in  
16 accordance with the methodologies specified in “Statistical Analysis of Groundwater Monitoring  
17 Data at RCRA Facilities” (EPA, 2009).

#### 18 L-4e(4) Comparisons and Reporting

19 Prior to TRU mixed waste receipt, measurements were made ~~of each~~ to establish a background  
20 concentration for each groundwater quality hazardous constituent specified in Permit Part 5,  
21 Table ~~L-5.4.b~~ at each DMW ~~every detection monitoring well. These measurements were made~~  
22 during each of the ten background sampling events (with the exception of trans-1,2-  
23 dichloroethylene and vanadium that were added after TRU mixed waste disposal began). These  
24 measurements serve as a statistical baseline (Permit Part 5, Table 5.6) that is used for  
25 evaluating the significance of the results of subsequent sampling events during detection  
26 monitoring. Time-trend control charts with associated screening values for each hazardous  
27 constituent are used for this evaluation. The Permittees will compare the results from  
28 groundwater hazardous constituents of ongoing annual groundwater sample analysis to these  
29 baseline values in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.97(h)(4)). If  
30 the comparisons show that a constituent statistically exceeds the baseline of the DMWs (as  
31 defined in 20.4.1.500 NMAC (incorporating 40 CFR §264.98(f))), the well shall be resampled  
32 and an analysis performed as soon as possible, in accordance with 20.4.1.500 NMAC  
33 (incorporating 40 CFR §264.98(g)(3)). The results of the statistical comparison will be reported  
34 annually to the NMED in the Annual Culebra Groundwater Report by November 30, as required  
35 under 20.4.1.500 NMAC (incorporating 40 CFR §264.98(g)).

#### 36 L-5 Reporting

##### 37 L-5a Laboratory Data Reports

38 Laboratory data will be provided in electronic and hard copy reports to the Permittees and will  
39 contain the following information for each analytical report:

- 40 • A brief narrative summarizing laboratory analyses performed, date of issue, deviations  
41 from the analytical method, technical problems affecting data quality, laboratory quality

1 checks, corrective actions (if any), and the project manager's signature approving  
2 issuance of the data report.

- 3 • Header information for each analytical data summary sheet including: sample number  
4 and corresponding laboratory identification number; sample matrix; date of collection,  
5 receipt, preparation and analysis; and analyst's name.
- 6 • Parameter and hazardous constituents, analytical results, reporting units, reporting limit,  
7 analytical method used.
- 8 • Results of QC sample analyses for all concurrently analyzed QC samples.

9 ~~All-analytical~~Analytical results will be provided to the NMED as specified in the Permit Part 5.

#### 10 L-5b Statistical Analysis and Reporting of Results

11 Analytical results for hazardous constituents from annual groundwater sampling activities will be  
12 compared and interpreted by the Permittees through generation of statistical analyses as  
13 specified in Section L-4e. The Permittees will perform statistical analyses; the results will be  
14 included in the Annual Culebra Groundwater Report in summary form, and will also be provided  
15 to the NMED as specified in Permit Part 5.

#### 16 L-5c Semi-Annual Groundwater Surface Elevation Report and Annual Culebra Groundwater 17 Report

18 Data collected from this DMP will be reported to the NMED as specified in Permit Part 5 in the  
19 Annual Culebra Groundwater Report. The report will include ~~all-applicable~~ information that may  
20 affect the comparison of background groundwater quality and groundwater surface elevation  
21 data through time. This information will include but is not limited to:

- 22 • DMW and WLMP well configuration changes that may have occurred from the time of  
23 the last measurement (i.e., plug installation and removal, packer removal and  
24 reinstallation, or both; and the type and quantity of fluids that may have been introduced  
25 into the test wells).
- 26 • Pumping activities that may have taken place since publication of the last annual report  
27 (i.e., related to groundwater quality sampling, hydraulic testing, and shaft installation or  
28 grouting) that may have taken place since the last annual groundwater report.
- 29 • A discussion of the origins of abnormal unexpected changes in the groundwater surface  
30 elevation, which ~~is-are~~ not attributable to site tests or natural stabilization of the site  
31 hydrologic system that exceeds 2 ft in a DMP well over the course of the period covered  
32 by the Annual Culebra Groundwater Report (this may indicate changes in  
33 recharge/discharge which would affect the assumptions regarding DMP well placement  
34 and constitute new information as specified in 20.4.1.900 NMAC (incorporating 40 CFR  
35 §270.41(a)(2)).
- 36 • The results of the annual measurements of densities.
- 37 • Annotated hydrographs.

- 1       • Groundwater flow rate and direction.
- 2       • Potentiometric surface map generated using the following steps:
  - 3           – Examine hydrographs to identify month having the largest number of Culebra water
  - 4           levels available with the fewest wells affected by pumping or other anthropogenic
  - 5           events.
  - 6           – Convert water levels from subject month to equivalent freshwater heads using fluid
  - 7           densities appropriate to the date.
  - 8           – Fit trend surface through freshwater heads.
  - 9           – Extrapolate the trend surface to the boundaries of the model domain used for the
  - 10          current Performance Assessment Baseline Calculations (**PABCs**) and define initial
  - 11          fixed-head boundary conditions based on the trend surface.
  - 12          – Using the ensemble-average Culebra transmissivity field used for the current PABC,
  - 13          optimize the model boundary heads to improve the fit of the model to the freshwater
  - 14          heads at the wells using optimization software interactively with MODFLOW.
  - 15          – Run MODFLOW with optimal boundary conditions fit.
  - 16          – Contour MODFLOW head results on WIPP site.
  - 17          – Compute particle path and travel time from the Waste Handling Shaft to the LWA
  - 18          Boundary.
  - 19          – Data analysis that will accompany the potentiometric surface map will include:
    - 20               ♦ Measured versus modeled scatter plot diagram
    - 21               ♦ Frequency of modeled head residuals
    - 22               ♦ Modeled residual freshwater head at each well
    - 23               ♦ Explanations for modeled misfit residuals greater than 16.4 feet (5
    - 24               meters).
- 25       • Semi-annual groundwater surface elevation results will be reported as specified in
- 26       Permit Part 5, ~~Condition~~ Section 5.10.2.2.

27 The DMP data used in generating the Annual Culebra Groundwater Report will be maintained  
28 as part of the WIPP facility Operating Record and will be provided to the NMED for review as  
29 specified in the permit.

1 L-6 Records Management

2 Records generated during groundwater sampling and water level monitoring will be maintained  
3 in either project files at the Permittees facility or the Operating Record. Project files will include,  
4 but are not limited to:

- 5 • Sampling and Analysis Plans (**SAPs**)
- 6 • SOPs
- 7 • Field Data Entry Sheets
- 8 • CofC/RFA forms
- 9 • Analytical Laboratory Data Reports
- 10 • Variance Logs and Nonconformance Reports
- 11 • Corrective Action Reports.

12 Detection Monitoring Program monitoring, testing, and analytical data and WLMP data will be  
13 maintained in the WIPP facility Operating Record.

14 L-7 Quality Assurance Requirements

15 Quality Assurance (~~QA~~) requirements specific to the DMP are presented in this section.

16 L-7a Data Quality Objectives and Quality Assurance Objectives

17 L-7a(1) Data Quality Objectives

18 Data Quality Objectives (DQOs) are qualitative and quantitative statements that specify the  
19 quality of data required to support project decisions. DQOs have been established to ensure  
20 that the data collected will be of a sufficient and known quality for their intended uses. The  
21 overall DQOs for this DMP are shown in the following sections.

22 L-7a(1)(i) Detection Monitoring Program

23 Collect accurate and defensible data of known quality that will be sufficient to assess the  
24 concentrations of constituents in the groundwater underlying the WIPP facility.

25 L-7a(1)(ii) Water Level Monitoring Program

26 Collect accurate and defensible data of known quality that will be sufficient to assess the  
27 groundwater flow direction and rate at the WIPP facility.

28 L-7a(2) Quality Assurance Objectives

29 Quality Assurance Objectives (**QAOs**) for measurement data have been specified in terms of  
30 accuracy, precision, completeness, representativeness, and comparability.

31

1 L-7a(2)(i) Accuracy

2 Accuracy is the closeness of agreement between a measurement and an accepted reference  
3 value. When applied to a set of observed values, accuracy is a combination of a random  
4 component and a common systematic error (bias) component. Measurements for accuracy will  
5 include analysis of calibration standards, laboratory control samples, matrix spike samples, and  
6 surrogate spike recoveries. The bias component of accuracy is expressed as percent recovery  
7 (%R). Percent recovery is expressed as follows:

8 
$$\%R = \frac{(\text{measured sample concentration})}{\text{true concentration}} \times 100$$

9 L-7a(2)(i)(A) Accuracy Objectives for Field Measurements

10 Field measurements will include pH, ~~Specific Conductance (SC)~~, temperature, specific gravity,  
11 and static groundwater surface elevation. Field measurement accuracy will be determined using  
12 calibration standards. Thermometers used for field measurements will be calibrated to the  
13 National Institute for Standards and Technology (NIST) traceable standard on an annual basis  
14 to ensure accuracy. Accuracy of groundwater surface elevation measurements will be checked  
15 before each measurement period by verifying calibration of the device within the specified  
16 schedule. ~~WIPP Waste Isolation Pilot Plant~~ document WP 13-1 outlines the basic requirements  
17 for field equipment use and calibration. ~~WIPP Waste Isolation Pilot Plant~~ facility SOPs contains  
18 instructions that outline protocols for maintaining current calibration of groundwater surface  
19 elevation measurement instrumentation.

20 L-7a(2)(i)(B) Accuracy Objectives for Laboratory Measurements

21 Analytical system accuracy will be quantified using the following laboratory accuracy QC  
22 checks: calibration standards, laboratory control samples (LCS), laboratory blanks, matrix and  
23 surrogate spike recoveries. Single LCSs and matrix spike and surrogate spike sample analyses  
24 will be expressed as %R. Laboratory analytical accuracy is parameter dependent and will be  
25 prescribed in the laboratory SOP.

26 L-7a(2)(ii) Precision

27 Precision is the agreement among a set of replicate measurements without assumption or  
28 knowledge of the true value. Precision data will be derived from duplicate field and laboratory  
29 measurements. Precision will be expressed as relative percent difference (RPD), which is  
30 calculated as follows:

31 ~~$$RPD = \frac{(\text{measured value sample 1} - \text{measured value sample 2})}{\text{average of measured samples 1 + 2}} \times 100$$~~ 
$$RPD = \left( \frac{|V_1 - V_2|}{\frac{V_1 + V_2}{2}} \right) \times 100$$

32 Where

33 RPD = relative percent difference  
34 V<sub>1</sub> = sample 1 measured value  
35 V<sub>2</sub> = sample 2 measured value

1 L-7a(2)(ii)(A) Precision Objectives for Field Measurements

2 Specific conductance, pH, and temperature will be measured during well purging ~~and after~~  
3 ~~sampling~~. ~~SC~~Specific conductance measurements will be precise to  $\pm 10\%$  pH to 0.10 standard  
4 unit, specific gravity to 0.01 by hydrometer and temperature to 0.10 degrees Celsius ( $^{\circ}\text{C}$ ).  
5 Water-level measurements will be precise to  $\pm 0.01$  ft. The precision of water density  
6 measurements, ~~when measured in the field~~calculated using down-hole pressure-transducer  
7 data instrumentation, will be determined on a well-by-well basis and will result in no more than a  
8  $\pm 2$  ft of error in the derived fresh-water head.

9 L-7a(2)(ii)(B) Precision Objectives for Laboratory Measurements

10 Precision of laboratory analyses will be determined by analyzing an LCS and a lab control  
11 sample duplicate (**LCS**D) or by analyzing one of the field samples in duplicate depending on the  
12 requirements of the particular standard method. The precision is measured as the RPD of the  
13 recoveries for the spiked LCS/LCSD pair or the RPD of the duplicate sample analysis results.  
14 Laboratory analytical precision is also parameter dependent and will be prescribed in laboratory  
15 SOPs.

16 L-7a(2)(iii) Contamination

17 In addition to measurements of precision and bias, QC checks for contamination will be  
18 performed. QC samples including trip blanks, field blanks, and method blanks will be analyzed  
19 to assess and document contamination attributable to sample collection equipment, sample  
20 handling and shipping, and laboratory reagents and glassware. Trip blanks will be used to  
21 assess volatile organic compound (**VOC**) sample contamination during shipment and handling  
22 and will be collected and analyzed at a frequency of ~~4~~one sample per sample shipment. Field  
23 blanks will be used to assess field sample collection methods and will be collected and analyzed  
24 at a minimum frequency of one sample per 20 samples (five percent of the samples collected).  
25 Method blanks will be used to assess contamination resulting from the analytical process and  
26 will be analyzed at a minimum frequency of one sample per 20 samples, or five percent of the  
27 samples collected. Evaluation of sample blanks will be performed following U.S. EPA "National  
28 Functional Guidelines for Organic Data Review" (EPA, 1999) and "National Functional  
29 Guidelines for Evaluating Inorganics Analyses" (EPA, 2004). Only method blanks will be  
30 analyzed via wet chemistry methods. The criteria for evaluating method blanks will be  
31 established as follows: If method blank results exceed method reporting limits, then that value  
32 will become the detection limit for the sample batch. Detection of analytes of interest in method  
33 blank samples may be used to disqualify some samples, requiring resampling and additional  
34 analyses on a case-by-case basis.

35 L-7a(2)(iv) Completeness

36 Completeness (%C) is a measure of the amount of usable valid data resulting from a data  
37 collection activity, given the sample design and analysis. Completeness (%C) may be affected  
38 by unexpected conditions that may occur during the data collection process.

39 Occurrences that reduce the amount of data collected include sample container breakage  
40 during sample shipment or in the laboratory and data generated while the laboratory was  
41 operating outside prescribed QC limits. All attempts will be made to minimize data loss and to  
42 recover lost data whenever possible. The completeness objective for analysis of Permit Part 5,

1 Table 5.4.a parameters will be 90 percent and 100 percent analysis of Permit Part 5, Table  
2 5.4.b hazardous constituents. If the completeness objective for Permit Part 5, Table 5.4.b  
3 hazardous constituents is not met, the Permittees will determine the need for resampling on a  
4 case-by-case basis. Numerical expression of the completeness (%C) of data is as follows:

$$5 \quad \%C = \frac{\text{number of accepted samples}}{\text{total number of samples collected}} \times 100$$

#### 6 L-7a(2)(v) Representativeness

7 Representativeness is the degree to which sample analyses accurately and precisely represent  
8 the media they are intended to represent. Data representativeness for this DMP will be  
9 accomplished through implementing approved sampling procedures and the use of validated  
10 analytical methods. Sampling procedures will be designed to minimize factors affecting the  
11 integrity of the samples. Groundwater samples will only be collected after well purging criteria  
12 have been met. The analytical methods selected will be those that will most accurately and  
13 precisely represent the true concentration of analytes of interest.

14 For water levels and density, representativeness is a qualitative term that describes the extent  
15 to which a sampling design adequately reflects the environmental conditions of a site. The  
16 SOPs for measurement ensure that samples are representative of site conditions.

#### 17 L-7a(2)(vi) Comparability

18 Comparability is the extent to which one data set can be compared to another. Comparability  
19 will be achieved through reporting data in consistent units and collection and analysis of  
20 samples using consistent methodology. Aqueous samples will consistently be reported in units  
21 of measures dictated by the analytical method. Units of measure include:

- 22 • Milligrams per liter (mg/L) for alkalinity, inorganic compounds and metals and
- 23 • Micrograms per liter (µg/L) for VOCs and semivolatile organic compounds (**SVOCs**).

24 Culebra groundwater surface elevation measurements will be expressed as equivalent  
25 freshwater elevation in feet above mean sea level.

#### 26 L-7b Design Control

27 The approved design for the DMP is specified in this PermitAttachment. Modifications to the  
28 DMP will be processed in accordance with 20.4.1.900 NMAC (incorporating 40 CFR §§ 270.42).

#### 29 L-7c Instructions, Procedures, and Drawings

30 The preparation and use of instructions and procedures at the WIPP facility are outlined in the  
31 WIPP facility document WP 13-1 (see Table L-3). Activities performed for the DMP that may  
32 affect groundwater data quality will be performed in accordance with approved procedures  
33 which comply with the Permit.



1 L-7d Document Control

2 Permittees will ensure that the latest approved versions of WIPP facility SOPs will be used in  
3 performing groundwater monitoring functions and that obsolete materials will be adequately  
4 identified or removed from work areas.

5 L-7e Inspection and Surveillance

6 Inspection and surveillance activities will be conducted as outlined in WIPP document WP 13-1  
7 (see Table L-3). The Permittees will be responsible for performing the applicable WIPP facility  
8 SOPs.

9 L-7f Control of Monitoring and Data Collection Equipment

10 WIPP document WP 13-1 (see Table L-3) outlines the basic requirements for control and  
11 calibrating monitoring and data collection (**M&DC**) equipment. M&DC equipment shall be  
12 properly controlled, calibrated, and maintained according to WIPP facility SOPs (see Table L-3)  
13 to ensure continued accuracy of groundwater monitoring data. Results of calibrations,  
14 maintenance, and repair will be documented. Calibration records will identify the reference  
15 standard and the relationship to national standards or nationally accepted measurement  
16 systems. Records will be maintained to track uses of M&DC equipment. If M&DC equipment is  
17 found to be out of tolerance, the equipment will be tagged and removed from service until  
18 corrections have been made and it will not be used until corrections are made.

19 L-7g Control of Nonconforming Conditions

20 In accordance with WP 13-1 (see Table L-3), equipment that does not conform to specified  
21 requirements will be controlled to prevent use. The disposition of defective items will be  
22 documented on records traceable to the affected items. Prior to final disposition, faulty items will  
23 be tagged and segregated. Repaired equipment will be subject to the original acceptance  
24 inspections and tests prior to use.

25 L-7h Corrective Action

26 Requirements for the development and implementation of a system to determine, document,  
27 and initiate appropriate corrective actions after encountering conditions adverse to quality at the  
28 WIPP facility are outlined in WIPP document WP 13-1 (see Table L-3). Conditions adverse to  
29 acceptable quality will be documented and reported in accordance with corrective action  
30 procedures and corrected as soon as practical. Immediate action will be taken to control work  
31 performed under conditions adverse to acceptable quality and its results to prevent quality  
32 degradation.

33 L-7i Quality Assurance Records

34 ~~WIPP document~~Standard operating procedure WP 13-1 (see Table L-3) outlines the policy that  
35 will be used at the WIPP facility regarding identification, preparation, collection, storage,  
36 maintenance, disposition, and permanent storage of QA records.

37 Records to be generated in the DMP will be specified by procedure. Quality Assurance (QA)  
38 and RCRA ~~operating~~Operating records~~Records~~ will be identified. This will be the basis for the

1 labeling of records as “QA” or “RCRA ~~operating~~Operating recordRecord” on the Environmental  
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## TABLES

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**Table L-1  
 Hydrological Parameters for Rock Units above the Salado at the WIPP Site**

Unit	Hydraulic Conductivity	Storage	Thickness	Hydraulic Gradient	
Santa Rosa	$2 \times 10^{-8}$ to $2 \times 10^{-6}$ m/s (1) (2)		0 to 91 m	0.001 (5)	
Dewey Lake	$10^{-8}$ m/s	Specific storage $1 \times 10^{-5}$ (1/m) (2)	152 m	0.001 (5)	
Rustler	Forty-niner	$1 \times 10^{-13}$ to $1 \times 10^{-11}$ m/s (anhydrite) $1 \times 10^{-9}$ m/s (mudstone) (2)	Specific storage $1 \times 10^{-5}$ (1/m) (2)	13 to 23 m	NA (6)
	Magenta	$1 \times 10^{-8.5}$ to $1 \times 10^{-6.5}$ m/s (2)	Specific storage $1 \times 10^{-5}$ (1/m) (2)	7 to 8.5 m	3 to 6
	Tamarisk	$1 \times 10^{-13}$ to $1 \times 10^{-11}$ m/s (anhydrite) $1 \times 10^{-9}$ m/s (mudstone) (2)	Specific storage $1 \times 10^{-5}$ (1/m) (2)	26 to 56 m	NA (6)
	Culebra	$1 \times 10^{-7.5}$ to $1 \times 10^{-5.5}$ m/s (2)	Specific storage $1 \times 10^{-5}$ (1/m) (2)	4 to 11.6 m	0.003 to 0.007 (5)
	Los Medaños	$6 \times 10^{-15}$ to $1 \times 10^{-13}$ m/s $1.5 \times 10^{-11}$ to $1.2 \times 10^{-11}$ m/s (basal interval)	Specific storage $1 \times 10^{-5}$ (1/m) (2)	29 to 38 m	NA (6)

Matrix characteristics relevant to fluid flow include values used in this table such as permeability, hydraulic conductivity, gradient, etc.)

Table Notes:

- (1) The Santa Rosa Formation is not present in the western portion of the WIPP site. It was combined with the Dewey Lake ~~Red Beds~~ in three-dimensional regional groundwater flow modeling (Corbet and Knupp, 1996), and the range of values entered here are those used in that study for the Dewey Lake/Triassic hydrostratigraphic unit.
- (2) Values or ranges of values given for these entries are the values used in three-dimensional regional groundwater flow modeling (Corbet and Knupp, 1996). Values are estimated based on literature values for similar rock types, adjusted to be consistent with site-specific data where available. Ranges of values include spatial variation over the WIPP site and differences in values used in different simulations to test model sensitivity to the parameter.

- (3) Hydraulic gradient is a dimensionless term describing change in the elevation of hydraulic head divided by change in horizontal distance. Values given in these entries are determined from potentiometric surfaces. The range of values given for the Culebra reflects the highest and lowest gradients observed within the WIPP site boundary. Values for the Dewey Lake and Santa Rosa are assumed to be the same as the gradient determined from the water table. Note that the Santa Rosa Formation is absent or above the water table in most of the controlled area, and that the concept of a horizontal hydraulic gradient is not meaningful for these regions.
- (4) Flow in units of very low hydraulic conductivity is slow, and primarily vertical. The concept of a horizontal hydraulic gradient is not applicable.

Sources: Beauheim, (1986); Domenico and Schwartz, (1990); Domski, Upton, and Beauheim, (1996); Earlough, (1977).



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**Table L-2**  
**WIPP Groundwater Detection Monitoring Program Sample Collection and Groundwater Surface Elevation Measurement Frequency**

Installation	Frequency
Groundwater Quality Sampling	
DMWs	Annually
Groundwater Surface Elevation Monitoring	
DMWs	Monthly and prior to sampling events
WLMP Wells (see Table L-4)	Monthly

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**Table L-3  
Standard Operating Procedures Applicable to the DMP**

Number	Title/Description
WP 02-EM1010	Field Parameter Measurements and Final Sample Collection: This procedure provides general instructions necessary to perform field analyses of serial samples in support of the DMP. Serial samples are collected and analyzed at the field laboratory for field indicators. Serial sample results help determine if pumped groundwater is representative of undisturbed groundwater within the formation. This procedure also describes the steps for collecting groundwater samples from the DMWs near the WIPP facility. Samples are collected and analyzed at the Field Laboratory until stabilization of the field parameters occurs. Final samples for Resource Conservation and Recovery Act (RCRA) analyses are collected and analyzed by a contract laboratory.
WP 02-EM1014	Groundwater Level Measurement: This document describes the method used for groundwater level measurements in support of groundwater monitoring at the WIPP facility using a portable electronic water-level probe.
WP 02-EM1026	Water Level Data Handling and Reporting: This procedure provides instructions on handling water level data. Data are collected and recorded on field forms in accordance with WP 02-EM1014. This procedure is initiated when wells in the water surveillance program have been measured for a given month.
WP 02-EM3001	Administrative Processes for Environmental Monitoring and Hydrology Programs: This procedure provides the administrative guidance environmental monitoring personnel use to maintain quality control associated with environmental monitoring sampling and reporting activities. This administrative procedure does not pertain to volatile organic compound (VOC) monitoring, with the exception of Section 5.0 which pertains to the regulatory reporting review process.
WP 02-EM3003	Data Validation and Verification of RCRA Constituents: This procedure provides instructions on performing verification and validation of laboratory data containing the analytical results of groundwater monitoring samples. This procedure is applied only to the non-radiological analyses results for compliance data associated with the detection monitoring samples. The data reviewed for this procedure includes general chemistry parameters and RCRA constituents.
WP-02-RC.01	Hazardous and Universal Waste Management Plan: This plan describes the responsibilities and handling requirements for hazardous and universal wastes generated at the WIPP facility. It is meant to ensure that these wastes are properly handled, accumulated, and transported to an approved Treatment, Storage, Disposal Facility (TSDF) in accordance with applicable state and federal regulations, U.S. Department of Energy (DOE) Orders, and Management and Operating Contractor (MOC) policies and procedures. This plan implements applicable sections of 20.4.1.100-1102 New Mexico Administrative Code (NMAC), <i>Hazardous Waste Management</i> (incorporating 40 <i>Code of Federal Regulations</i> [CFR] Parts 260-268 and 273).
WP 10-AD3029	Calibration and Control of Monitoring and Data Collection Equipment: This procedure provides direction for the control and calibration of Monitoring and Data Collection (M&DC) equipment at the WIPP facility, and ensures traceability to <del>NIST</del> (National Institute of Standards and Technology) (NIST) standards, international standards, or intrinsic standards. This procedure also establishes requirements and responsibilities for identifying recall equipment, and for obtaining calibration services for WIPP facility M&DC equipment.
WP 13-1	Management and Operating Contractor Quality Assurance Program Description: This document establishes the minimum quality requirements for MOC personnel and guidance for the development and implementation of <del>QA</del> quality assurance programs by MOC organizations.

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**Table L-4**  
**List of Culebra Wells in the WLMP, Current as of January 2022**

WELL ID	WELL ID	WELL ID
AEC-7R	IMC-461	SNL-15
C-2737	SNL-1	SNL-16
H-4bR	SNL-2	SNL-17
H-5bR	SNL-3	SNL-18
H-6bR	SNL-5	SNL-19
H-9bR	SNL-6	WQSP-1
H-10cR	SNL-8	WQSP-2
H-11b4R	SNL-9	WQSP-3
H-12R	SNL-10	WQSP-4
H-15R	SNL-12	WQSP-5
H-16	SNL-13	WQSP-6
H-19 pad*	SNL-14	WIPP-11R

\*The water level for the H-19b0 well on the H-19 pad is measured monthly; the fluid density measured annually at well H-19b0 will be used to correct for freshwater head for the other wells on the H-19 pad (H-19b2, H-19b3, H-19b4, H-19b5, H-19b6, and H-19b7).

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**Table L-5**  
**Details of Construction for the Six Culebra Detection Monitoring Wells**

NAME (Figure)	DATE DRILLED	TOTAL DEPTH feet (meters) bgs	DEPTH INTO LOS MEDAÑOS feet (meters)	DRILLING DEPTHS feet (meters) bgs		CASING feet (meters) bgs		PACKING feet (meters) bgs		CULEBRA INTERVAL feet (meters) bgs
				WITH AIR	CORING	DEPTH FOR 5 in. CASING	INTERVAL FOR SLOTTED SCREEN	SAND PACK INTERVAL	BRADY GRAVEL PACK INTERVAL	
WQSP-1 Figure <del>7M-71</del>	September 13 through 16, 1994	737 (225)	15 (5)	696 (212)	696 to 737 (212 to 225)	737 ( <del>225-22</del> 5)	702 to 727 (214 to <del>222-222</del> )	640 to 651 (195 to 198)	651 to 737 (198 to 225)	699 to 722 (213 to 220)
WQSP-2 Figure <del>8M-72</del>	September 6 through 12, 1994	846 (258)	12 (4)	800 (244)	800 to 846 (244 to 258)	846 (258)	811 to 836 (247 to 255)	790 to 793 (241 to 242)	793 to 846 (242 to 258)	810.1 to 833.7 (247 to 254)
WQSP-3 Figure <del>9M-73</del>	October 20 through 26, 1994	880 (268)	10 (3)	833 (254)	833 to 880 (254 to 268)	880 (268)	844 to 869 (257 to 265)	827 to 830 (252 to 253)	830 to 880 (253 to 268)	844 to 870 (257 to 265)
WQSP-4 Figure <del>40M-74</del>	October 5 through 10, 1994,	800 (244)	9 (3)	740 (226)	740 to 798 (226 to 243)	800 (244)	764 to 789 (233 to 240)	752 to 755 (229 to 230)	755 to 800 (230 to 244)	766 to 790.8 (233 to 241)
WQSP-5 Figure <del>44M-75</del>	October 12 through 18, 1994,	681 (208)	7 (2)	648 (198)	648 to 676 (198 to 206)	681 (208)	646 to 671 (197 to 205)	623 to 626 (190 to 191)	626 to 681 (191 to 208)	648 to 674.4 (198 to 205)
WQSP-6 Figure <del>42M-76</del>	September 26 through October 3, 1994	616.6 (188)	10 (3)	568 (173)	568 to 617 (173 to 188)	617 (188)	581 to 606 (177 to 185)	567 to 570 (173 to 174)	570 to 616.6 (174 to 188)	582 to 606.9 (177 to 185)

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**Table L-6  
 Analytical Parameter and Sample Requirements**

(10) PARAMETERS	(12) NO. OF BOTTLES	(13) VOLUME	(14) TYPE	(15) ACID WASH	(16) SAMPLE FILTER	(17) PRESERVATIVE	(18) HOLDING TIME
Indicator <sup>1</sup> Parameters: <ul style="list-style-type: none"> <li>• pH</li> <li>• SC</li> <li>• TOC</li> </ul>	- - 4	25 <del>ml</del> <sup>2</sup> mL <sup>1</sup> 100 <del>ml</del> <sup>2</sup> mL <sup>1</sup> 15 <del>ml</del> <sup>2</sup> mL <sup>1</sup>	Glass Glass Glass	Field determined Field determined yes	No No No	Field determined Field determined HCl	None None 28 <del>days</del> <sup>2</sup> days <sup>1</sup>
General Chemistry	1	1 <del>Liter</del> <sub>L</sub>	Plastic	Yes	No	HNO <sub>3</sub> , pH<2	not specified in DMP
Phenolics	1	1 <del>Liter</del> <sub>L</sub>	Amber Glass	Yes	No	H <sub>2</sub> SO <sub>4</sub> , pH<2	not specified in DMP
Metals/Cations	2	1 <del>Liter</del> <sub>L</sub>	Plastic	Yes	No	HNO <sub>3</sub> , pH<2	6 <del>months</del> <sup>2</sup> , <sup>3</sup> 1,2
VOC	4	40 <del>ml</del> <sub>mL</sub>	Glass	No	No	HCL, <del>pH</del> <sub>pH</sub> <2	14 <del>days</del> <sup>2</sup> days <sup>1</sup>
VOC ( <del>Purgable</del> <sub>Purgeable</sub> )	2	40 <del>ml</del> <sub>mL</sub>	Glass	No	No	HCL, <del>pH</del> <sub>pH</sub> <2	14 <del>days</del> <sup>2</sup> days <sup>1</sup>
VOC (Non- <del>Purgable</del> <sub>Purgeable</sub> )	2	40 <del>ml</del> <sub>mL</sub>	Glass	No	No	HCL, <del>pH</del> <sub>pH</sub> <2	14 <del>days</del> <sup>2</sup> days <sup>1</sup>
<del>BN/As</del> <sub>Semi-VOC</sub>	1	<del>½-Gallon</del> <sub>1 L</sub>	Amber Glass	Yes	No	None	14 <del>days</del> <sup>1</sup>
TCLP	1	1 <del>Liter</del> <sub>L</sub>	Plastic	Yes	No	HNO <sub>3</sub> , pH<2	7 <del>days</del> <sup>2</sup> days <sup>1</sup>
Cyanide (Total)	1	1 <del>Liter</del> <sub>L</sub>	Plastic	Yes	No	NaOH, pH>12	14 <del>days</del> <sup>2</sup> days <sup>1</sup>
Sulfide	1	250 <del>ml</del> <sub>mL</sub>	Amber Glass	Yes	No	NaOH + Zn Acetate	28 <del>days</del> <sup>2</sup> days <sup>1</sup>
Radionuclides	1	1 Gallon	Plastic Cube	Yes	Yes	HNO <sub>3</sub> , pH<2	6 <del>months</del> <sup>2</sup> months <sup>1</sup>

<sup>1</sup> – RCRA Detection Monitoring Analytes

<sup>2</sup> = As specified in Table 4-1 of the RCRA TEGD

<sup>3</sup> = Reduced holding time of 1 week for WIPP-specific Divalent cation 2 samples noted in the GMD

Note: Unless otherwise indicated, information in this table is from SOP WP 02-EM1010 and is provided as information only.

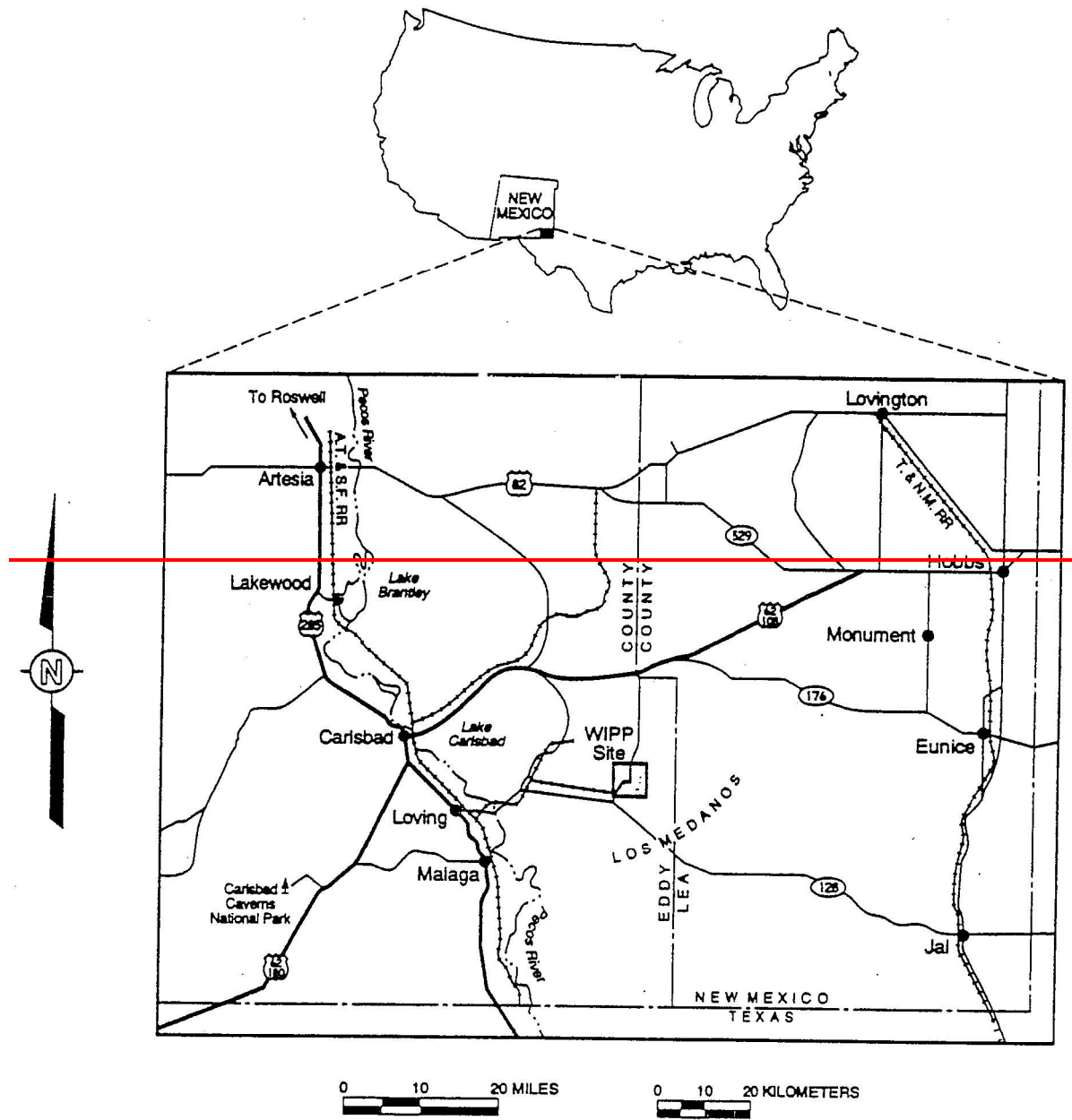
Note: Deviations from this table are allowed with prior approval by the NMED.

3

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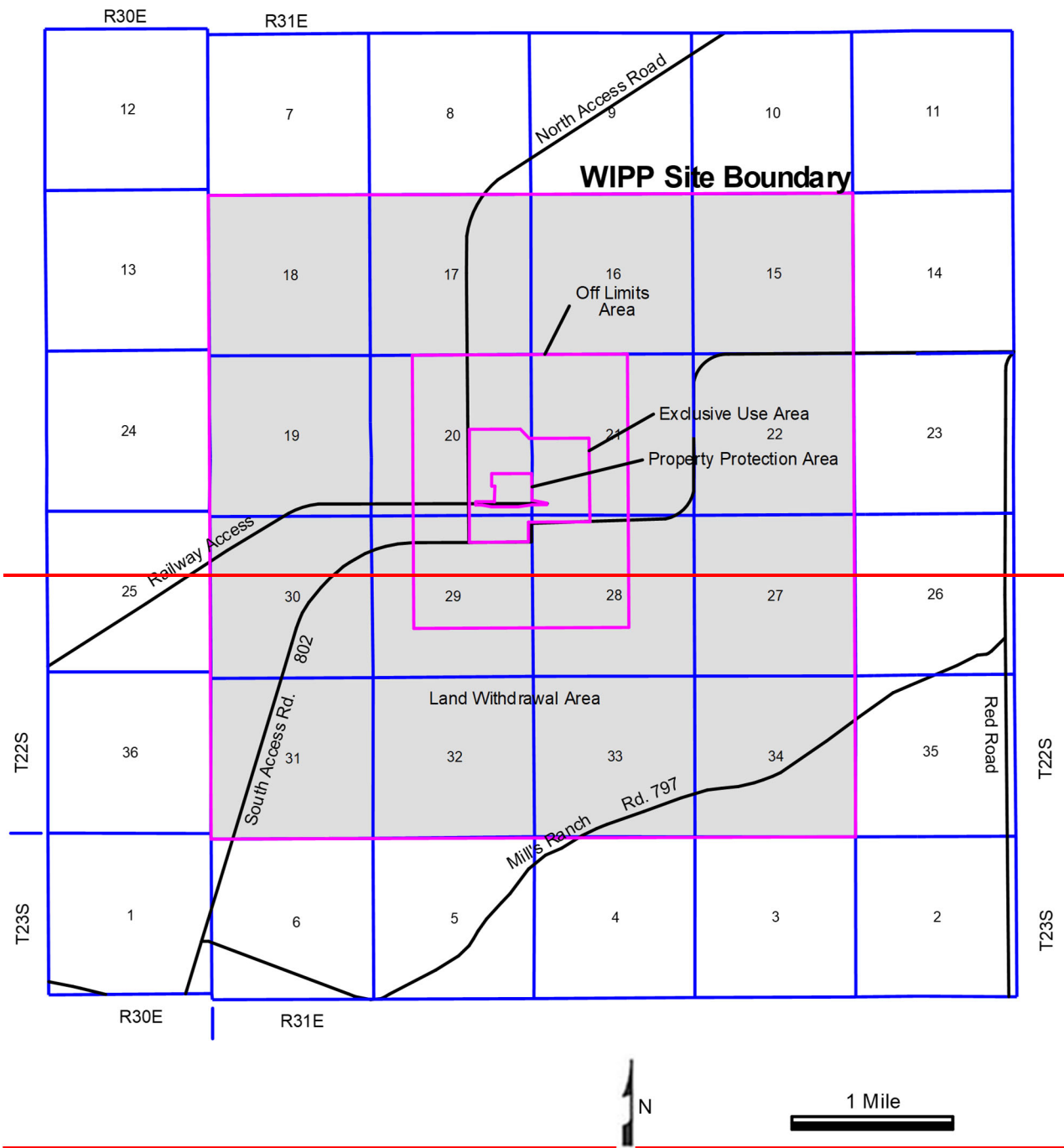
2

## **FIGURES**



**Figure L-4**  
**General Location of the WIPP Facility**

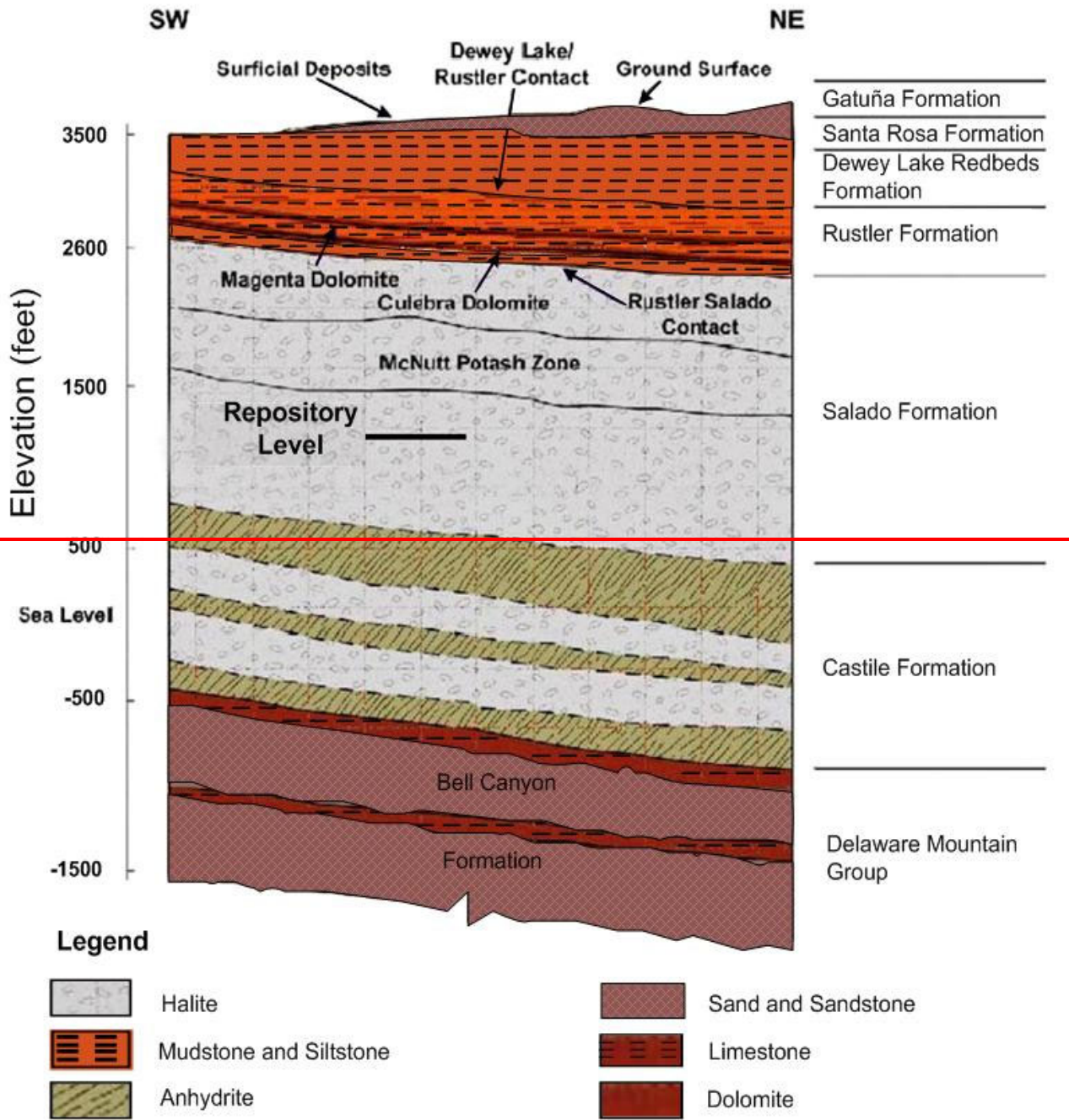




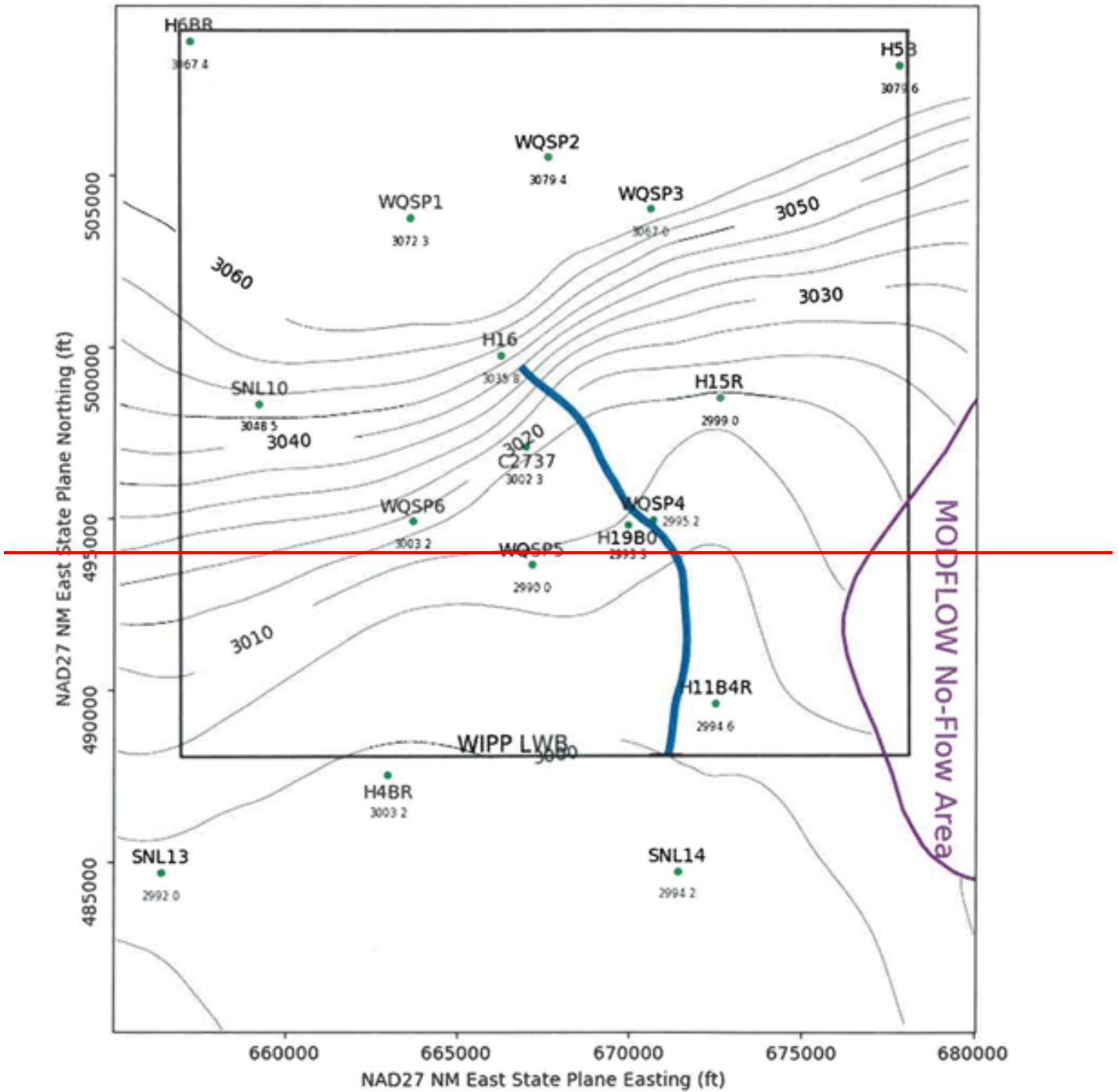
**Figure L-2**  
**WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary**

SYSTEM	SERIES	GROUP	FORMATION	MEMBER
RECENT	RECENT		SURFICIAL DEPOSITS	
QUATERNARY	PLEISTOCENE		MESCALERO CALICHE	
			GATUÑA	
TERTIARY	MID-PLIOCENE		OGALLALA	
TRIASSIC		DOCKUM	SANTA ROSA	
PERMIAN	OCHOAN		DEWEY LAKE	
			RUSTLER	Forty-niner
				Magenta
				Tamarisk
				Culebra
				Los Medaños
		Upper		
	GUADALUPIAN	DELAWARE MOUNTAIN	SALADO	McNutt Potash
				Lower
			CASTILE	
BELL CANYON				
		CHERRY CANYON		
		BRUSHY CANYON		

**Figure L-3**  
**Site Geologic Column**

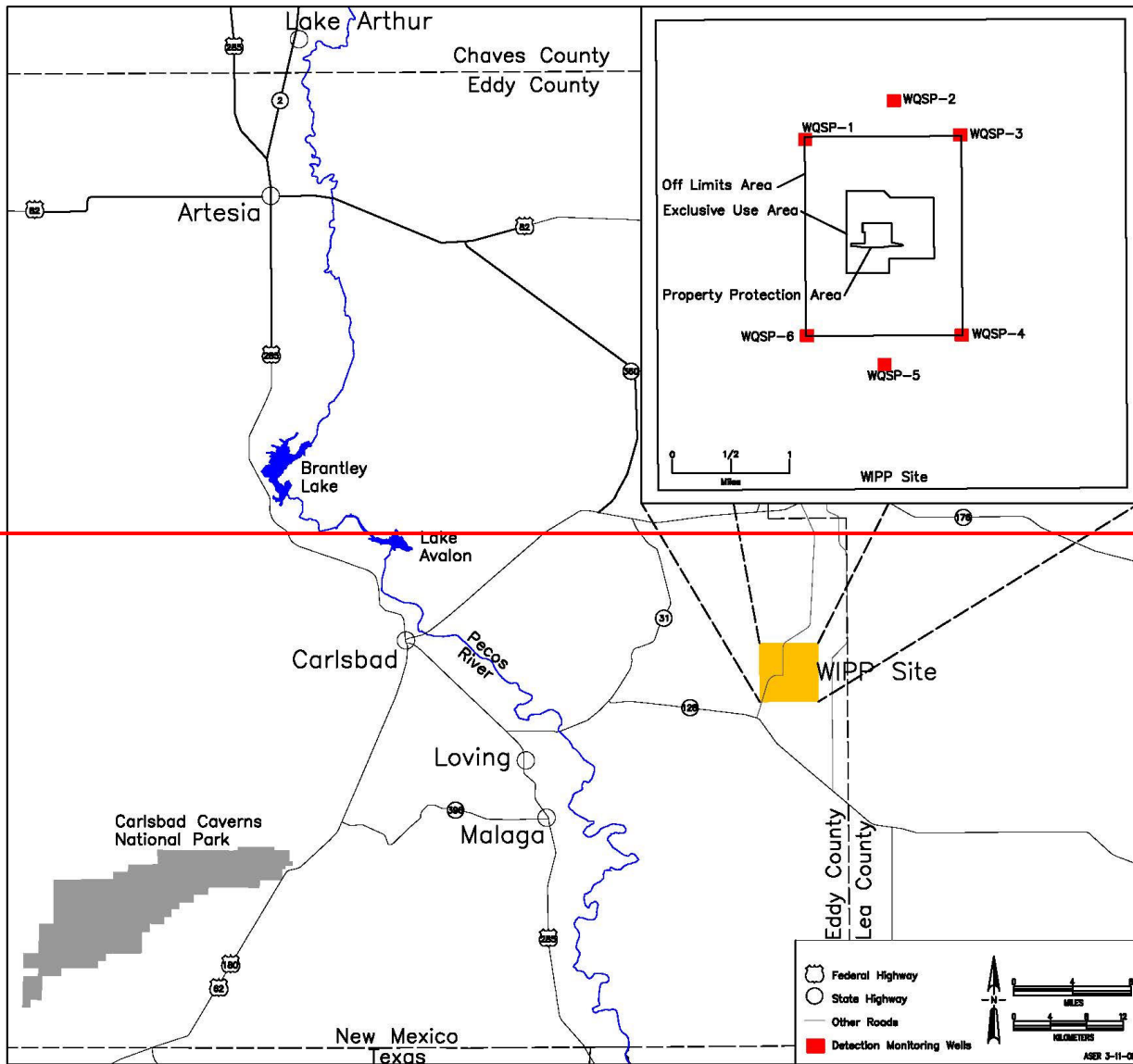


**Figure L-4**  
**Generalized Stratigraphic Cross Section above Bell Canyon Formation at WIPP Site**

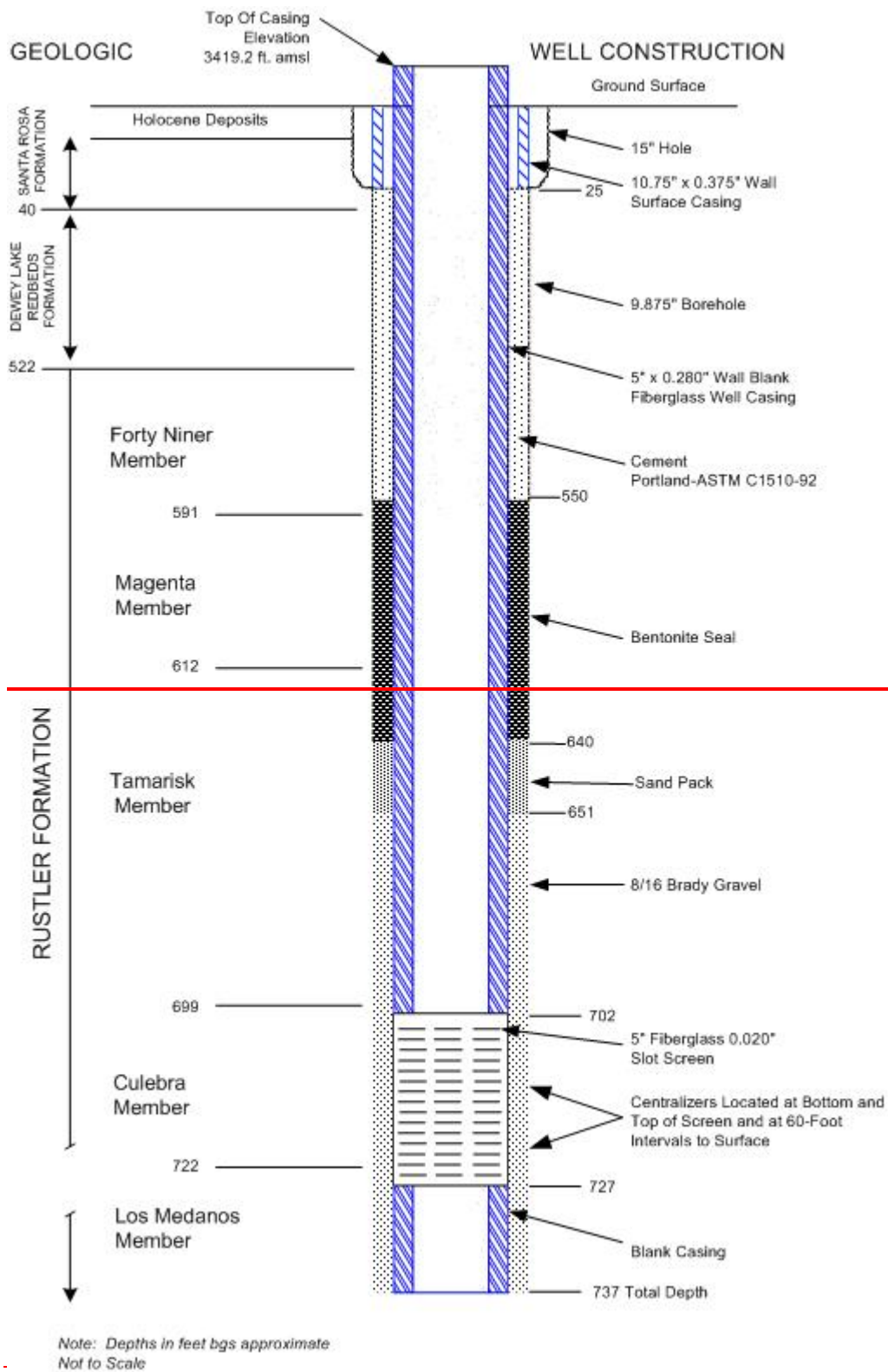


*Model-generated September-2019 utilizing May-2018 freshwater head contours with observed heads (ft) listed at each well. Contours are at 5-ft intervals with the blue line particle track from the waste handling shaft to the WIPP Land Withdrawal Boundary. The purple line is a constant head boundary representing the Rustler halite margin.*

**Figure L-5  
 Culebra Freshwater Head Potentiometric Surface**

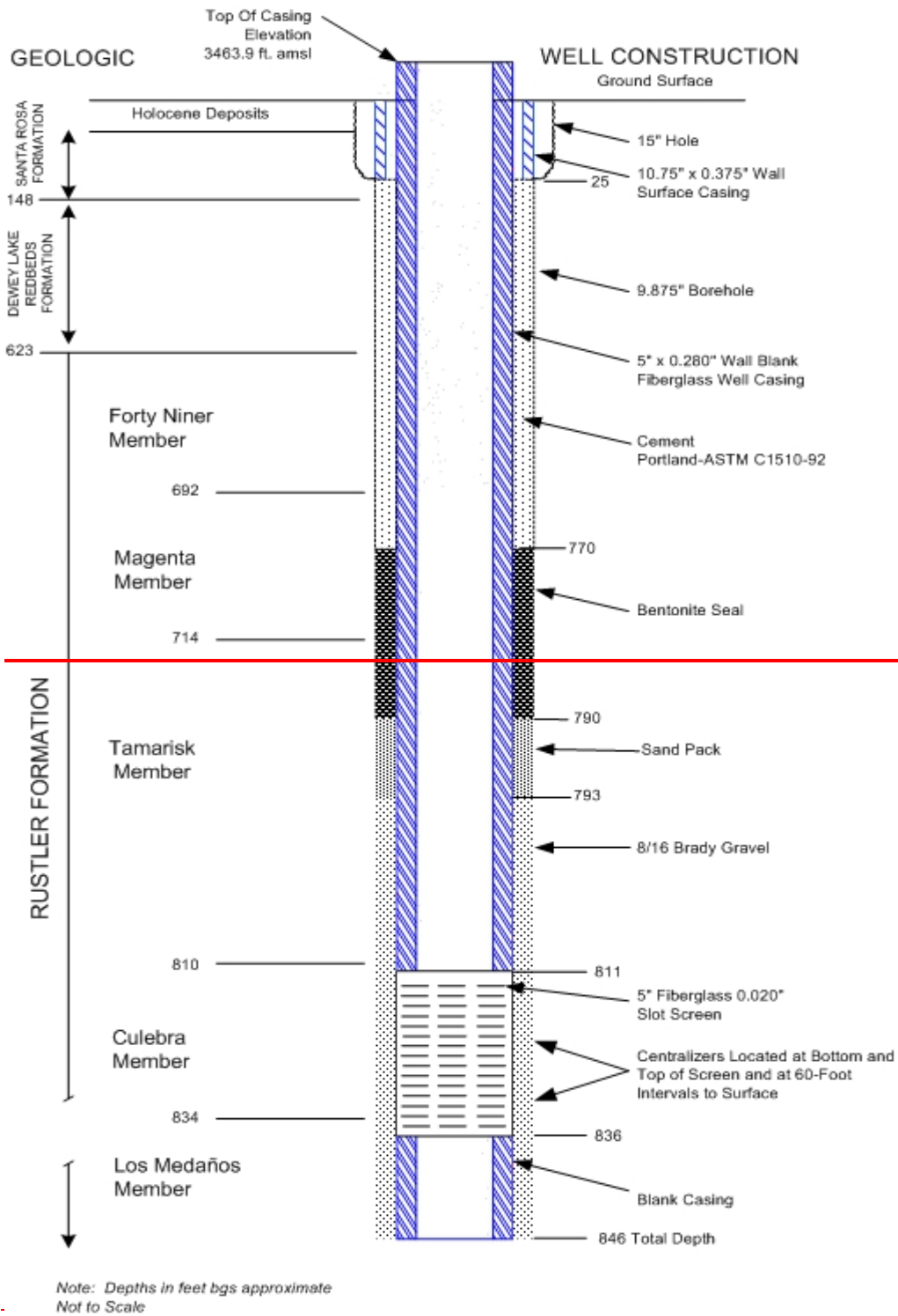


**Figure L-6**  
**Detection Monitoring Well Locations**



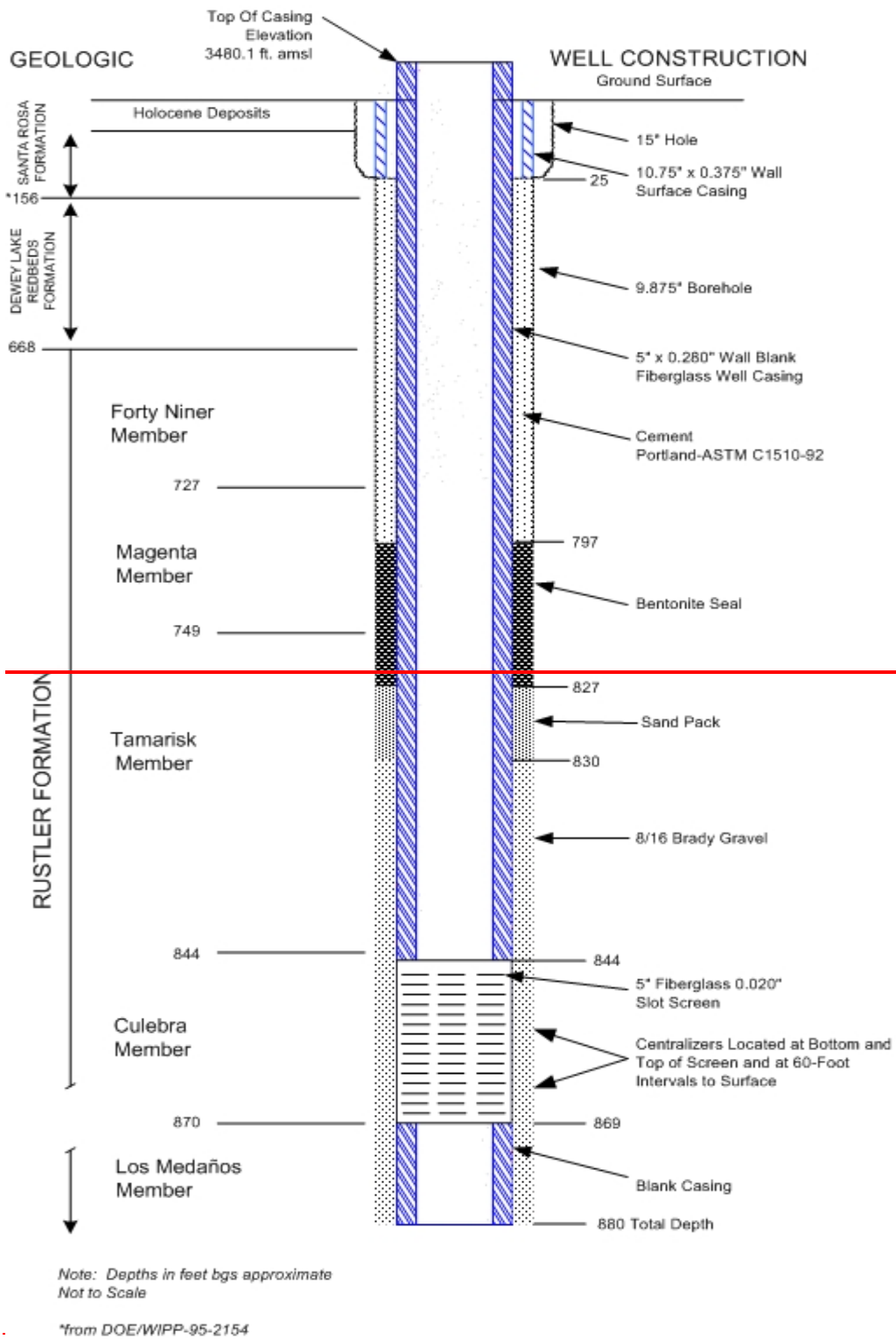
**Figure L-7**  
**As-Built Configuration of Well WQSP-1**



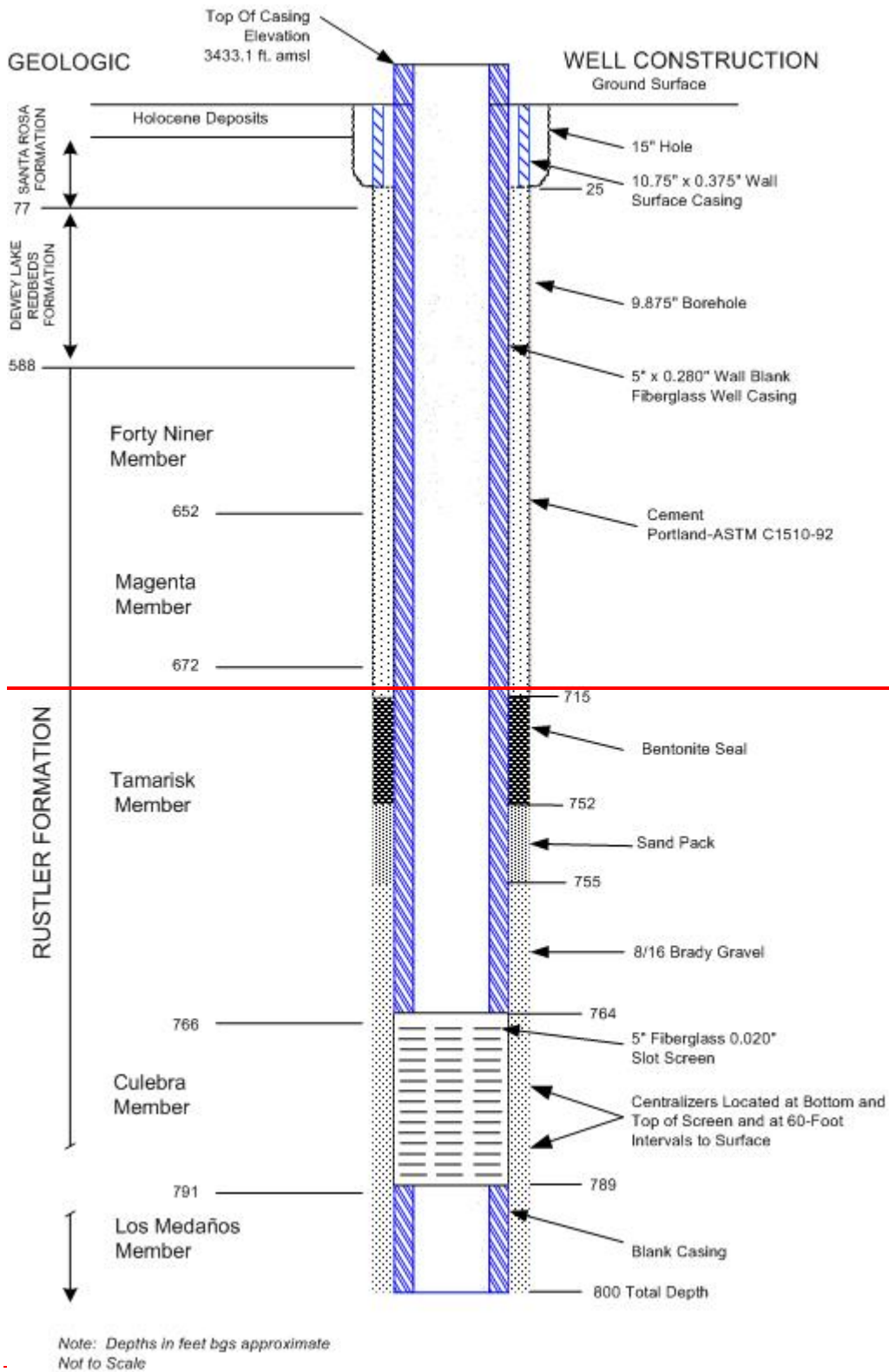


**Figure L-8**  
**As-Built Configuration of Well WQSP-2**

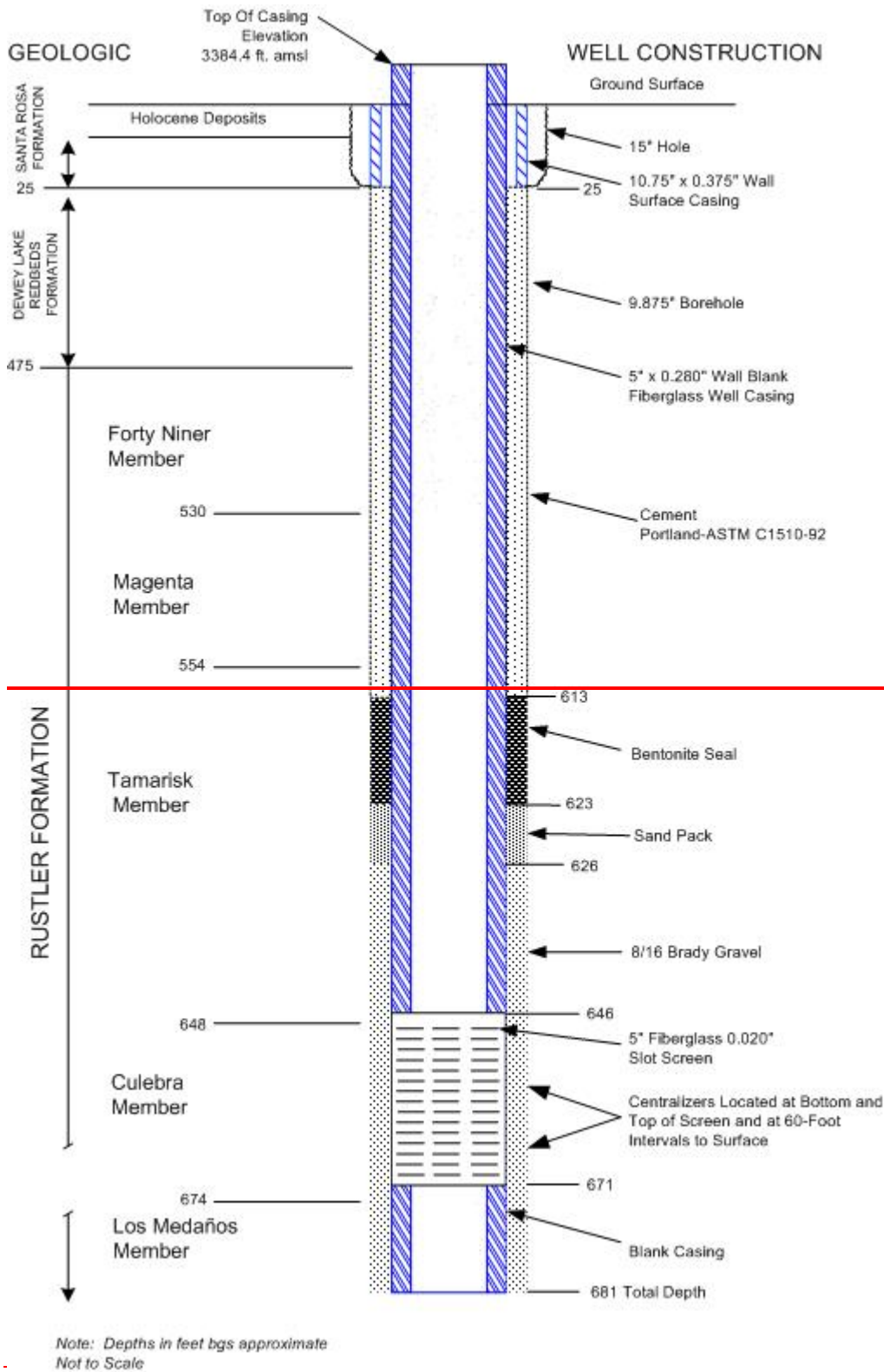




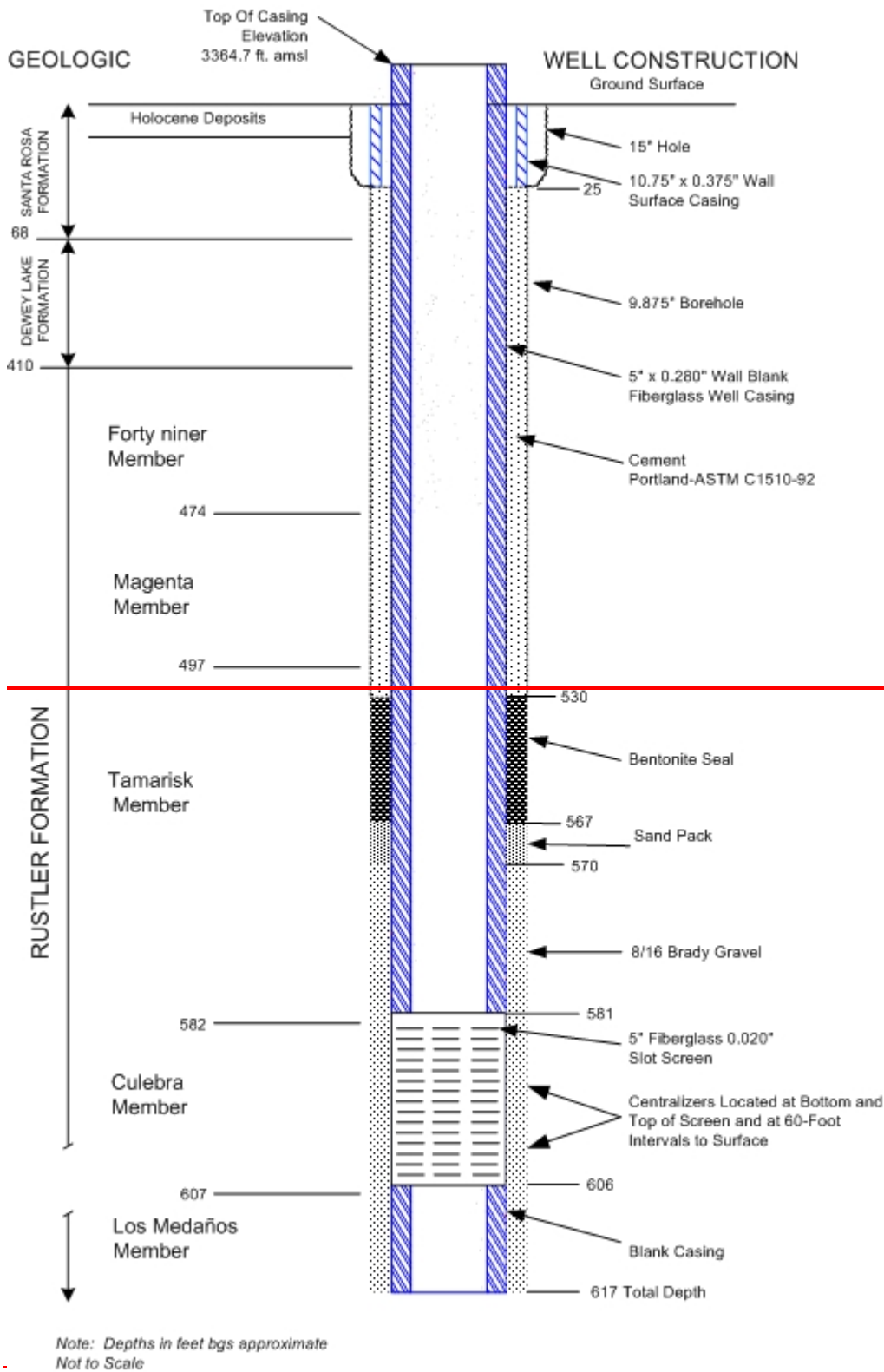
**Figure L-9**  
**As-Built Configuration of Well WQSP-3**




**Figure L-10**  
**As-Built Configuration of Well WQSP-4**



**Figure L-11**  
**As-Built Configuration of Well WQSP-5**



**Figure L-12**  
**As-Built Configuration of Well WQSP-6**



# CHAIN OF CUSTODY RECORD

Page \_\_\_ of \_\_\_

Project Number	Project Name:	Contract Laboratory	Container Size / Request Analytes		Total Number of Containers
Samplers: Date: _____ Matrix: _____ Time: _____ Sample Number: _____					
Relinquished By: (Signature)	Date / Time		Received By: (Signature)	Date / Time	Received By: (Signature)
Relinquished By: (Signature)	Date / Time	Relinquished By: (Signature)	Date / Time	Relinquished By: (Signature)	Received By: (Signature)
Requested Turnaround Time:		Sample Receipt Remarks:		Special Instructions:	
<input type="checkbox"/> Routine <input type="checkbox"/> Rush					
Sample Disposal:		Results To			
<input type="checkbox"/> Return to Client <input type="checkbox"/> Disposal by Lab					
Carrier / Airbill No.:					

WHITE - Testing Laboratory  
 AF - Air Filter(s)  
 SE - Sediment

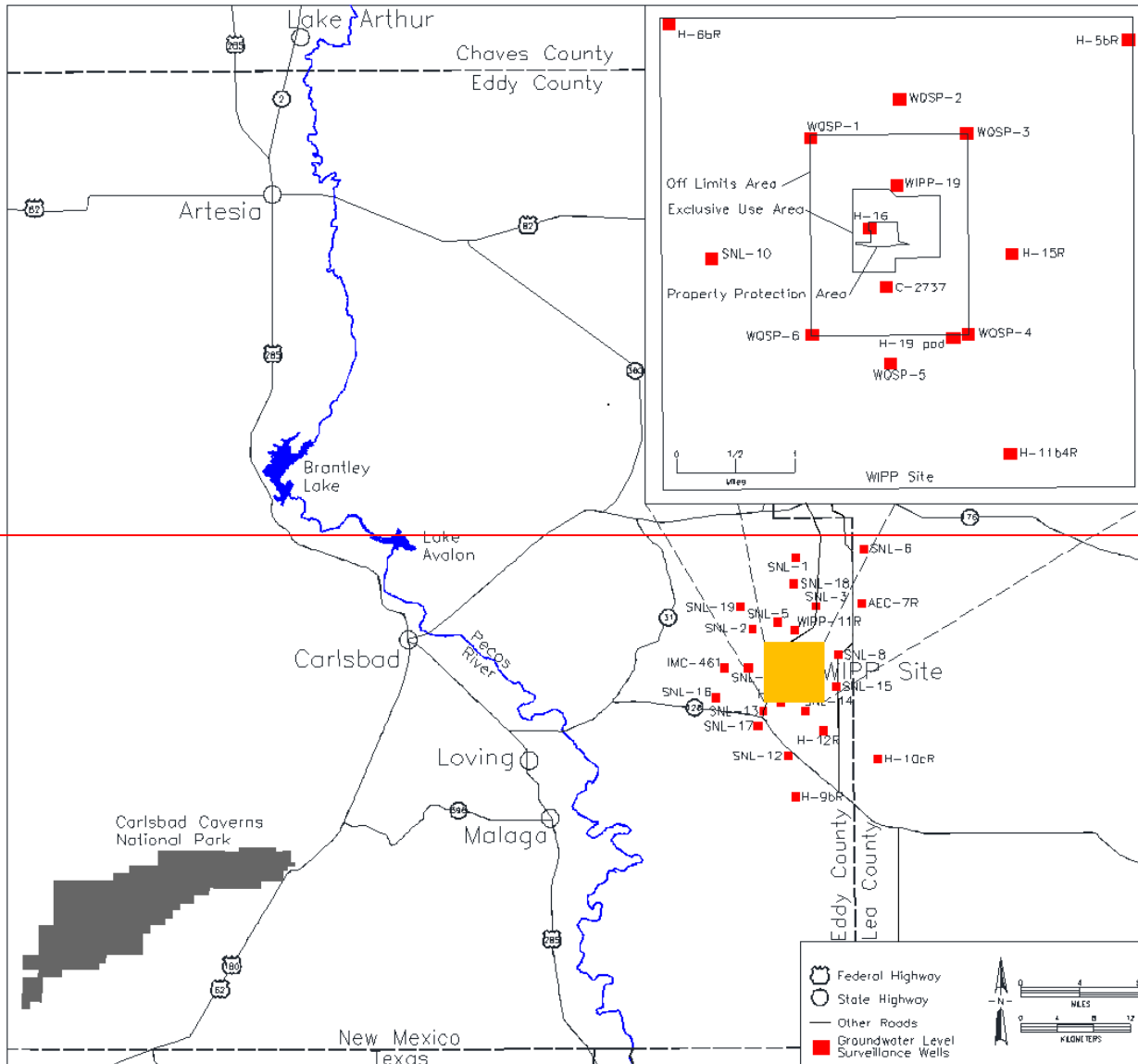
YELLOW - Field copy  
 AN - Animal(s)  
 SO - Soil

PINK - Record Copy  
 DI - Deionized Water  
 SW - Surface Water

GW - Ground Water  
 VG - Vegetation

WIP 02-EN3001, revision xxx

**Figure L-13**  
**Example Chain-of-Custody/Request for Analysis Form**



**Figure L-14**  
**Groundwater Level Surveillance Wells**  
 (inset represents the groundwater surveillance wells in WIPP Land Withdrawal Area)

1

**ATTACHMENT M**  
**FIGURES**



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DISCLAIMER

The figures presented in this attachment are illustrations and are for information purposes only.  
These figures are not to scale.

## ATTACHMENT M

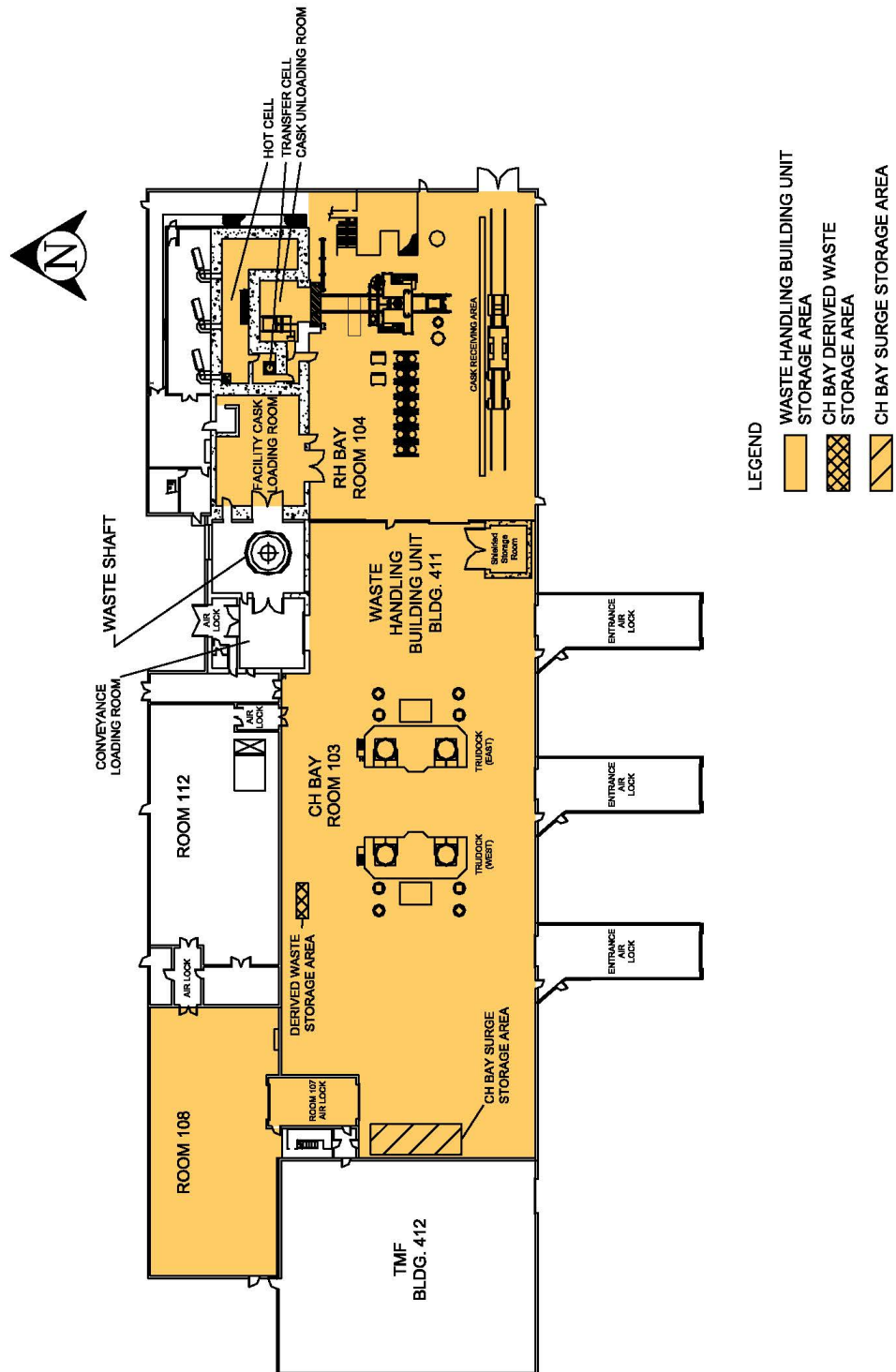
### FIGURES

#### LIST OF FIGURES

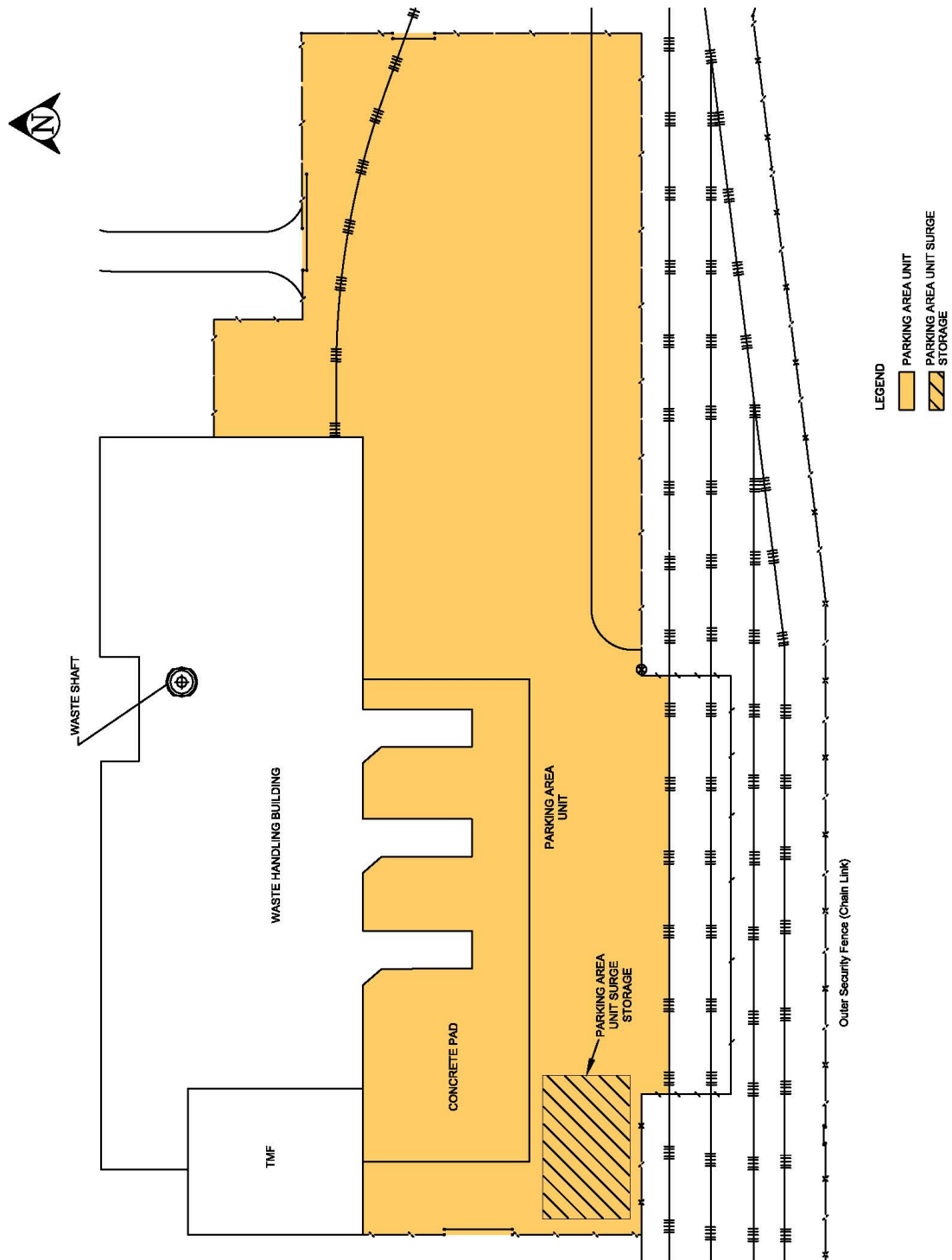
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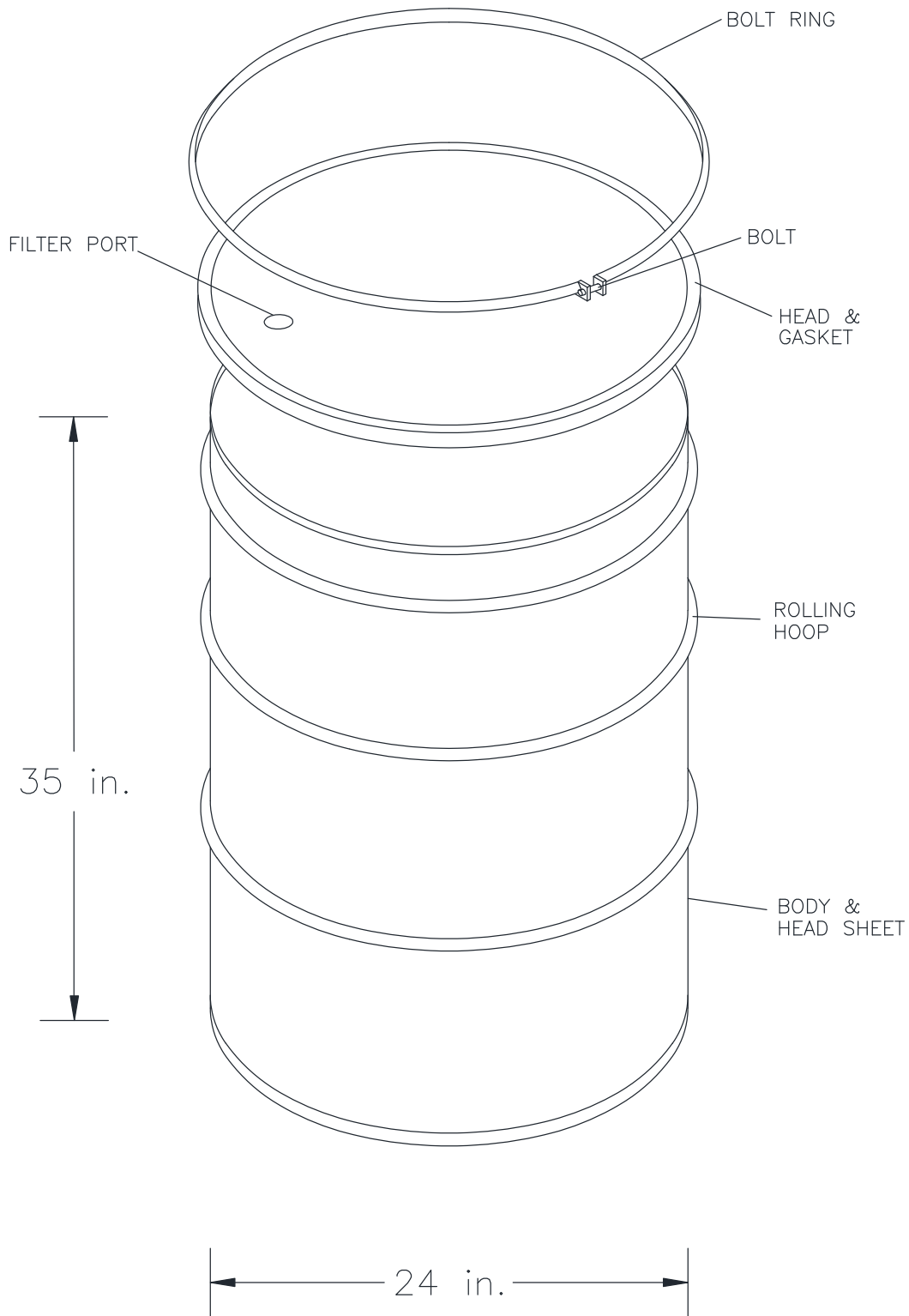
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**Figure M-1**  
 Waste Handling Building Unit – TRU Mixed Waste Container Storage and Surge Areas

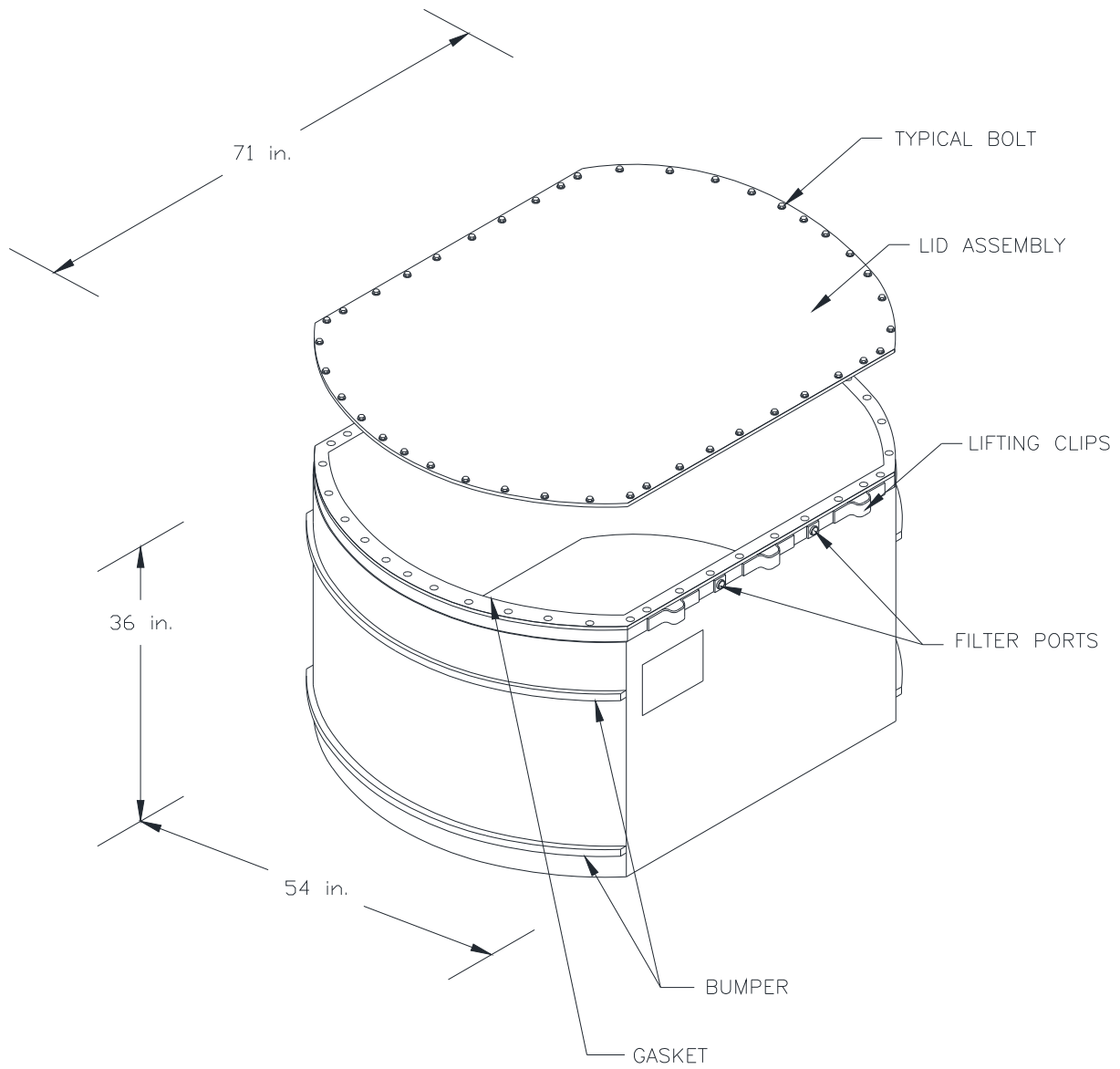


**Figure M-2**  
**Parking Area Unit – TRU Mixed Waste Container Storage and Surge Areas**

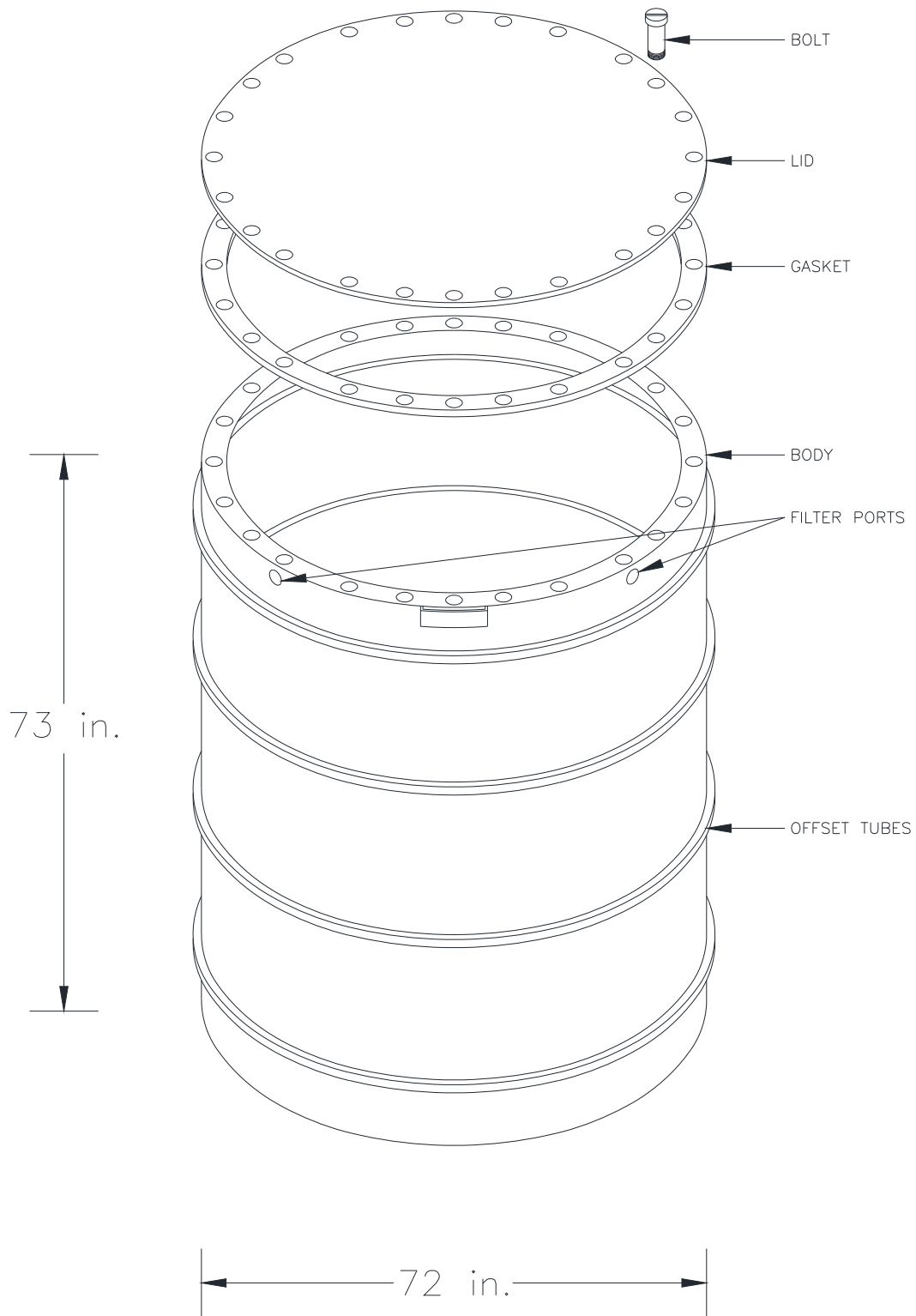


**Figure M-3**  
**Standard 55-Gallon Drum (Typical)**

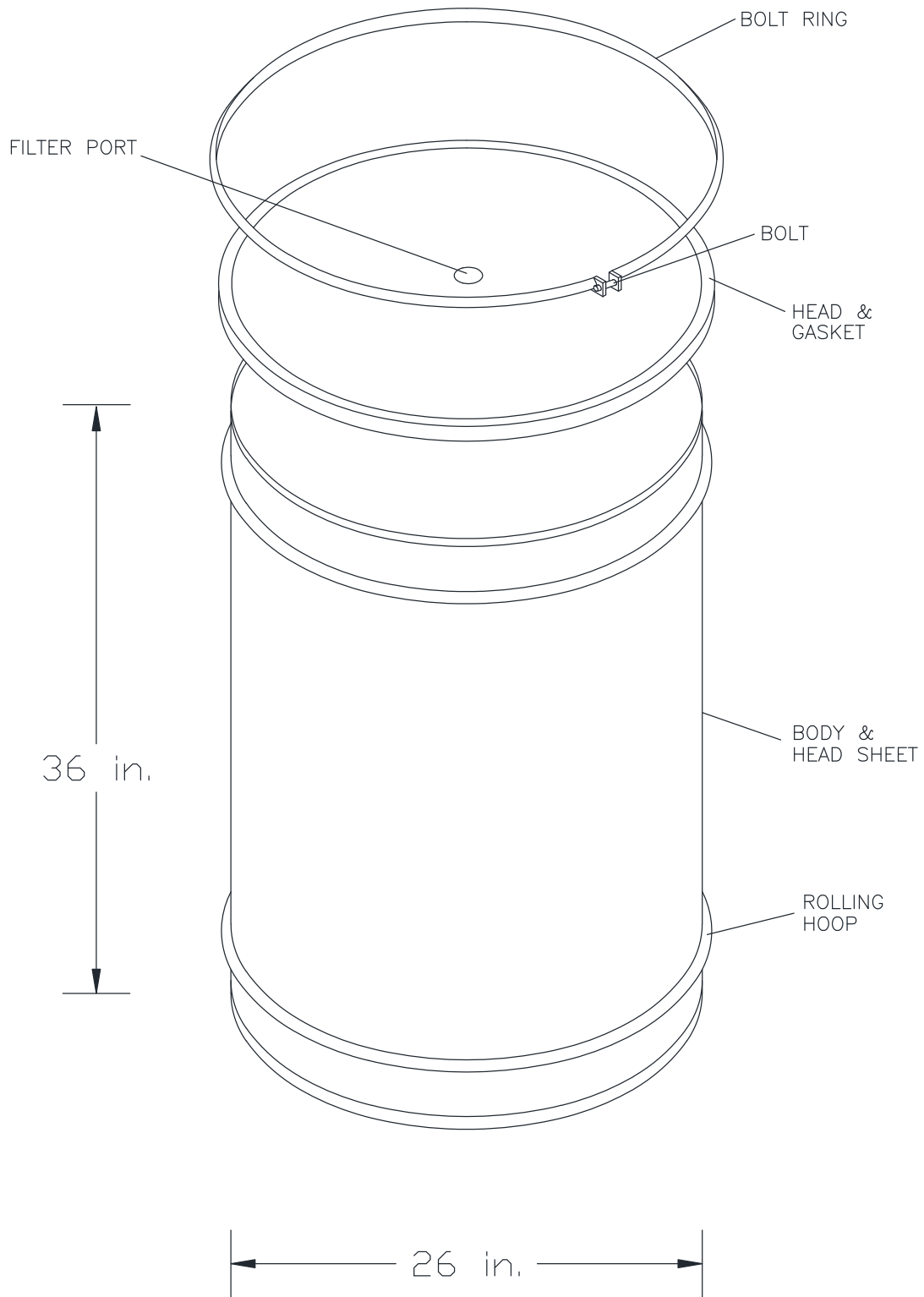




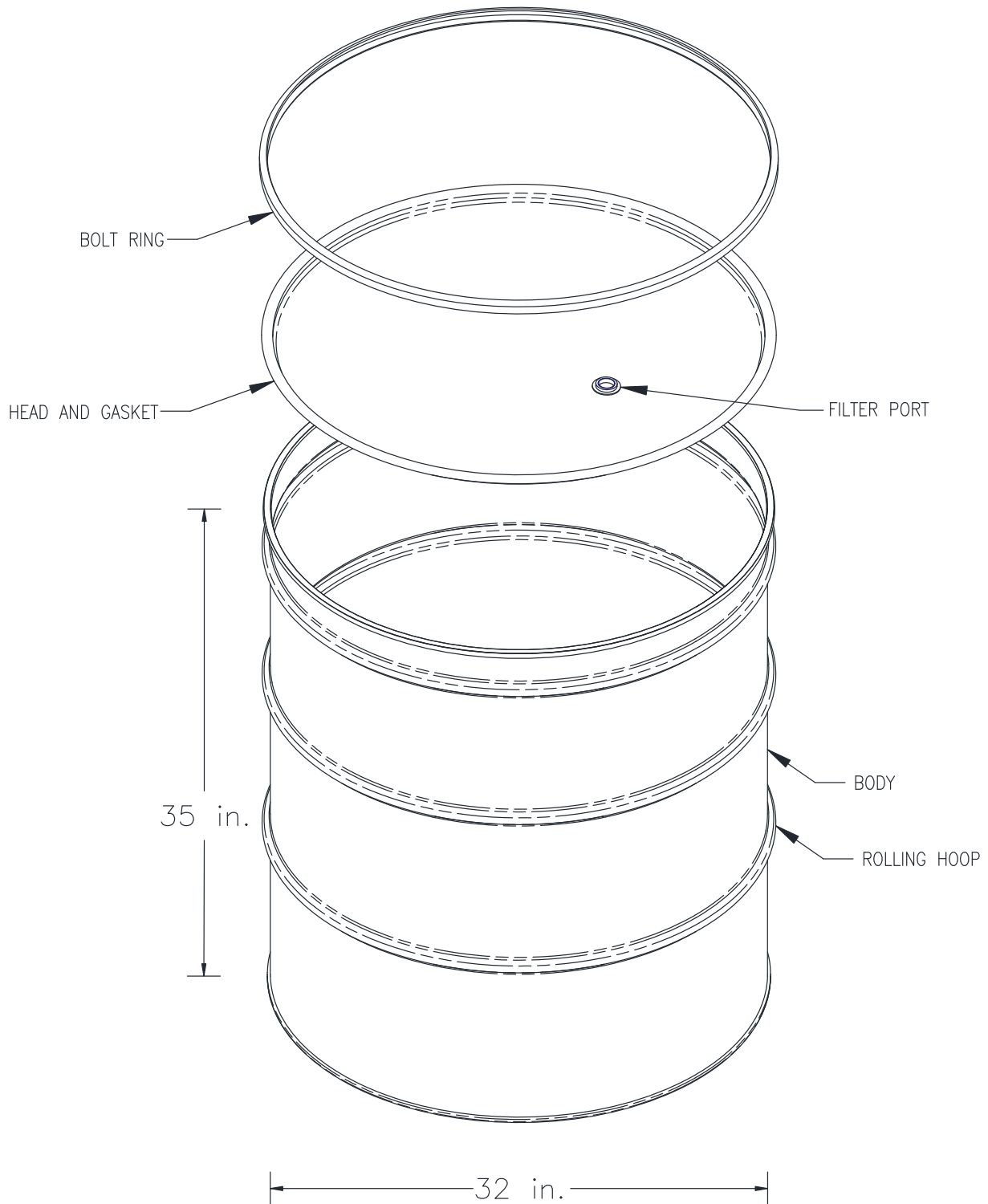
**Figure M-4**  
**Standard Waste Box**



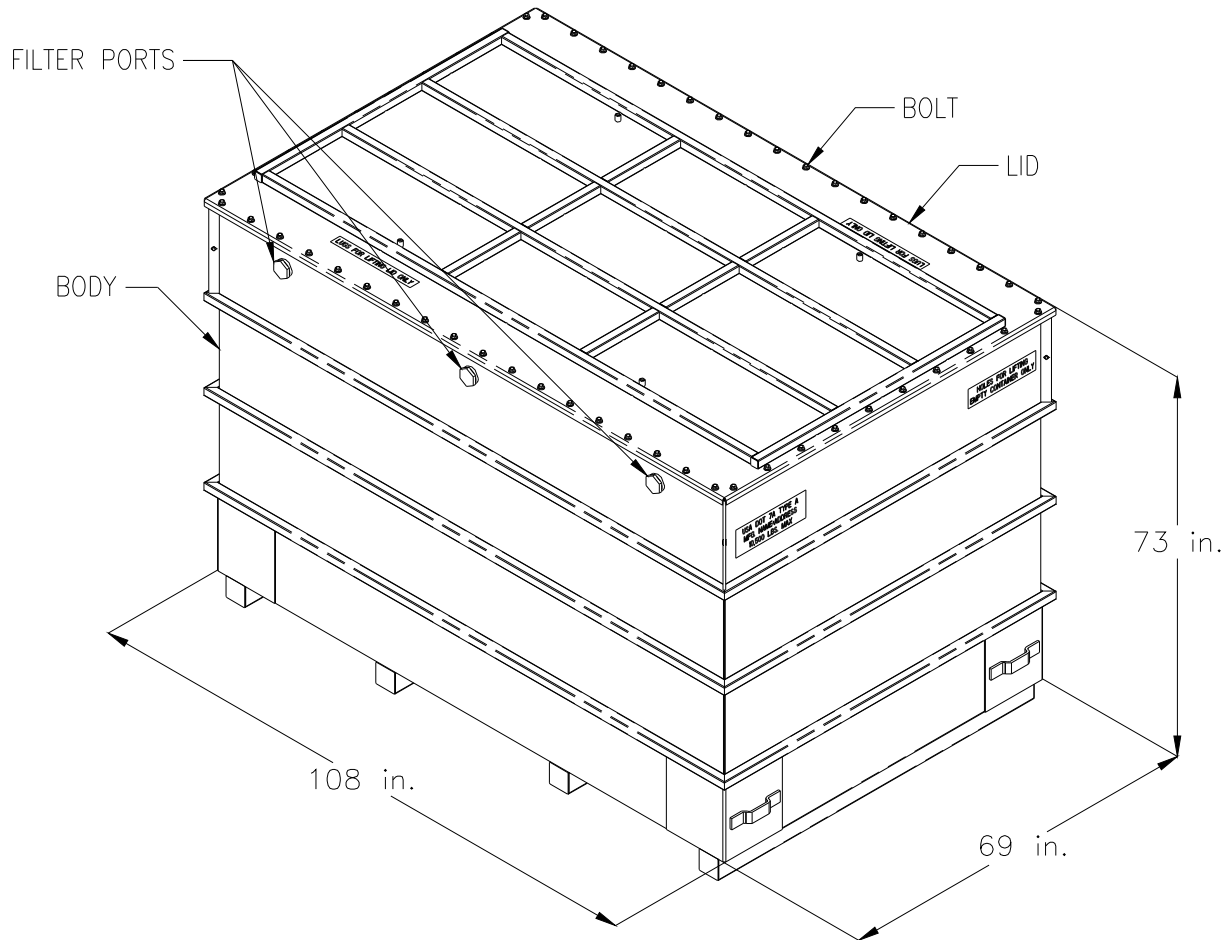
**Figure M-5**  
**Ten-Drum Overpack**



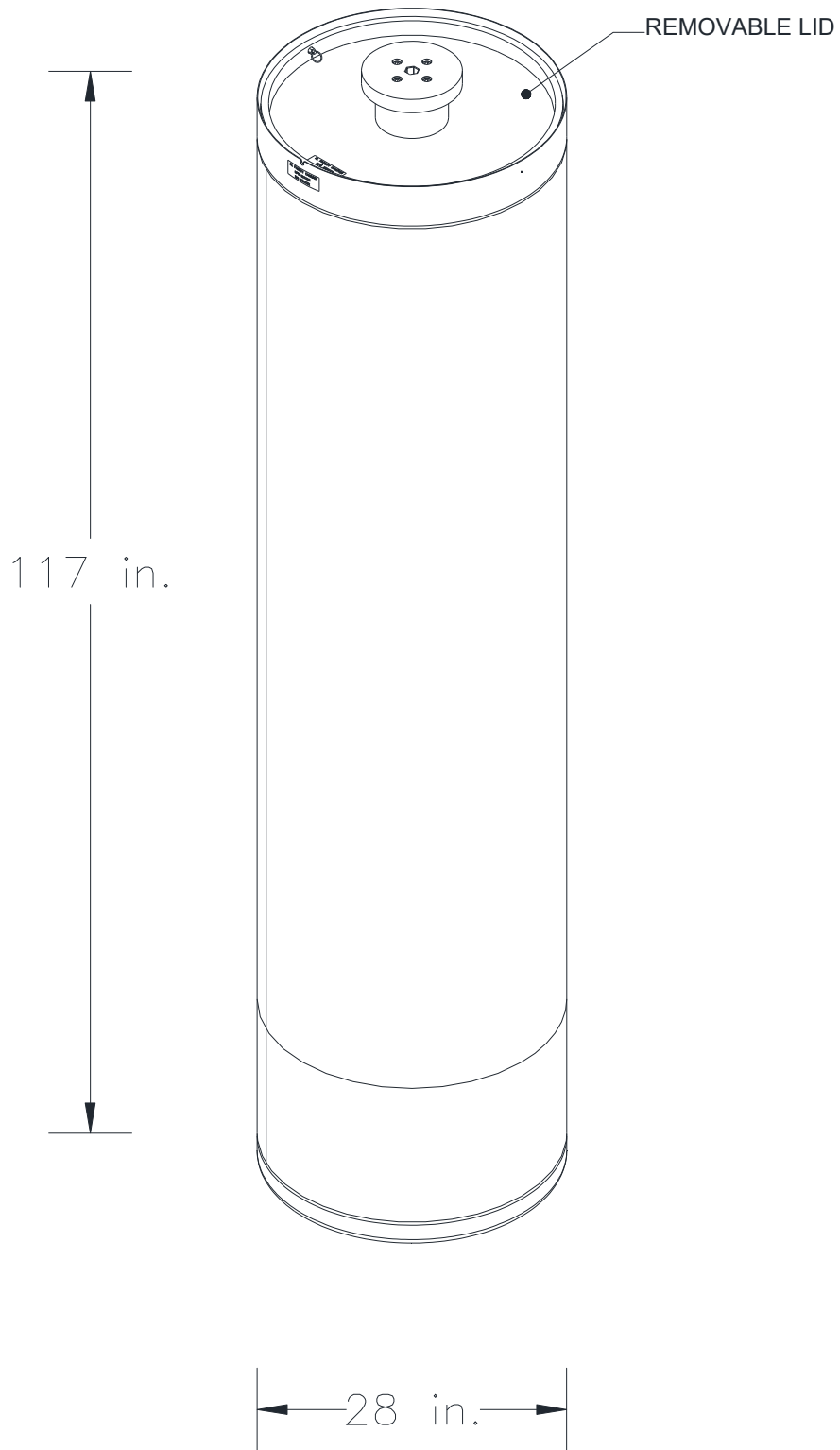
**Figure M-6**  
**85-Gallon Drum**



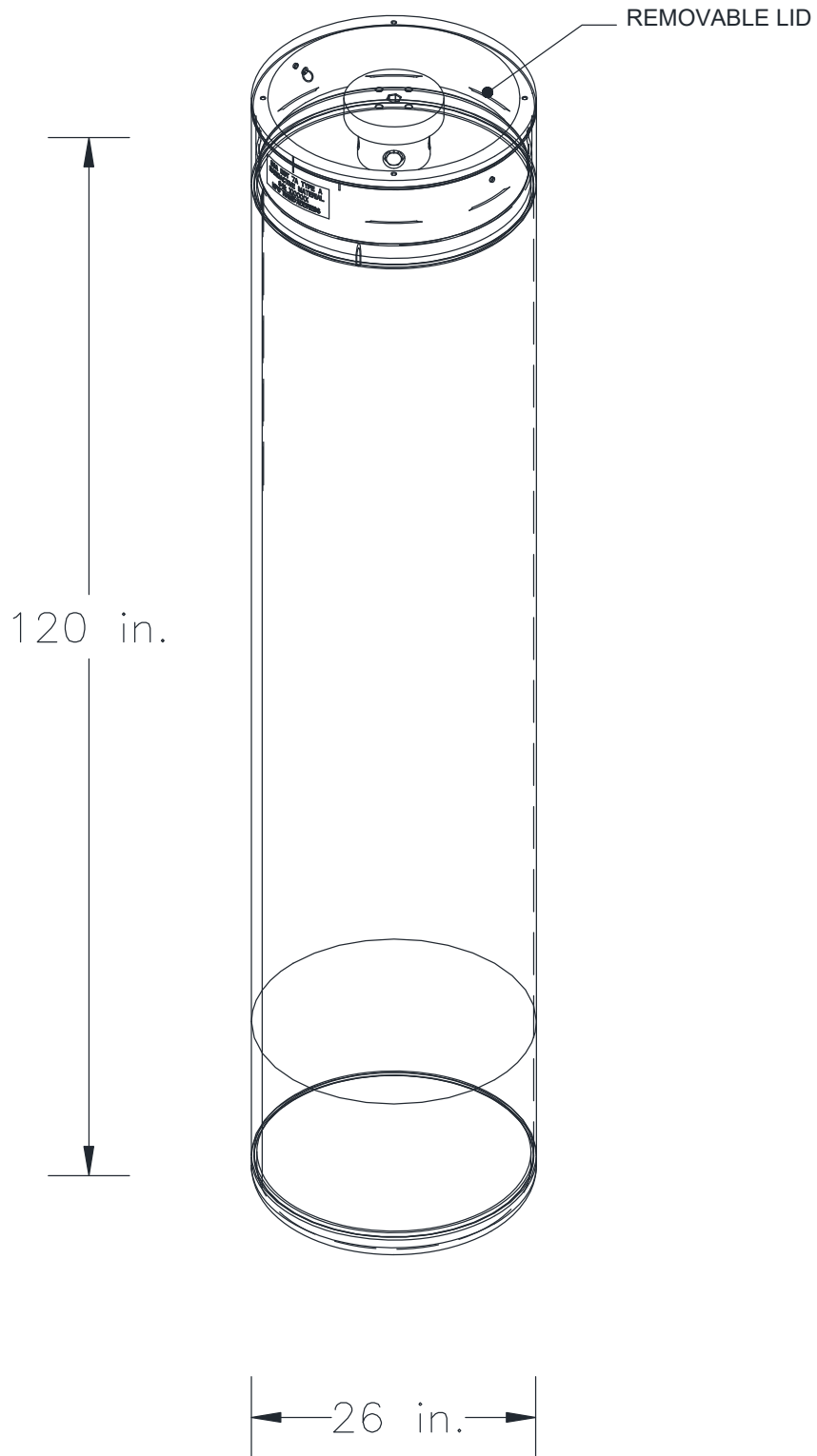
**Figure M-7**  
**100-Gallon Drum**



**Figure M-8**  
**Typical Standard Large Box 2**

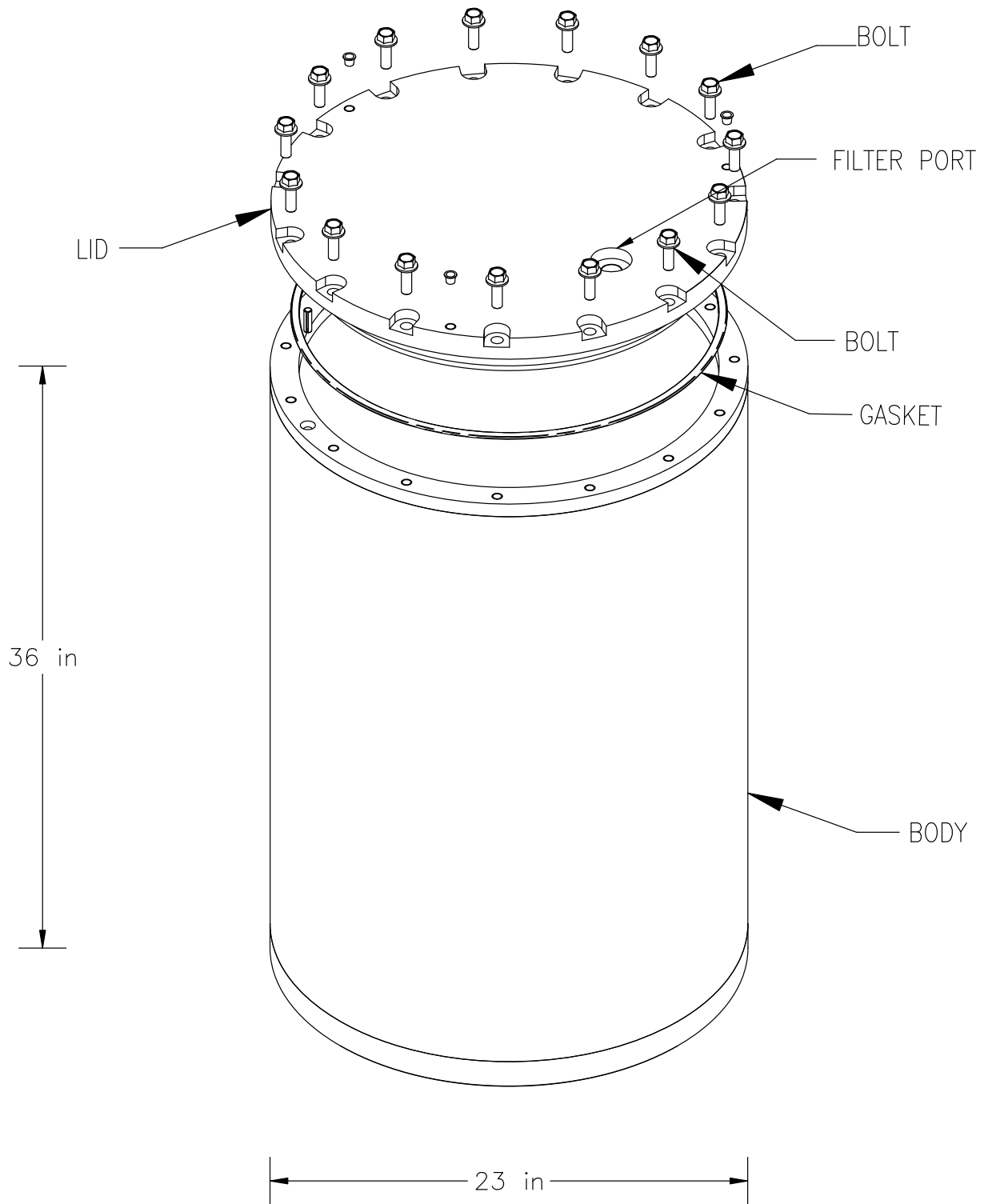


**Figure M-9**  
**Facility Canister Assembly**

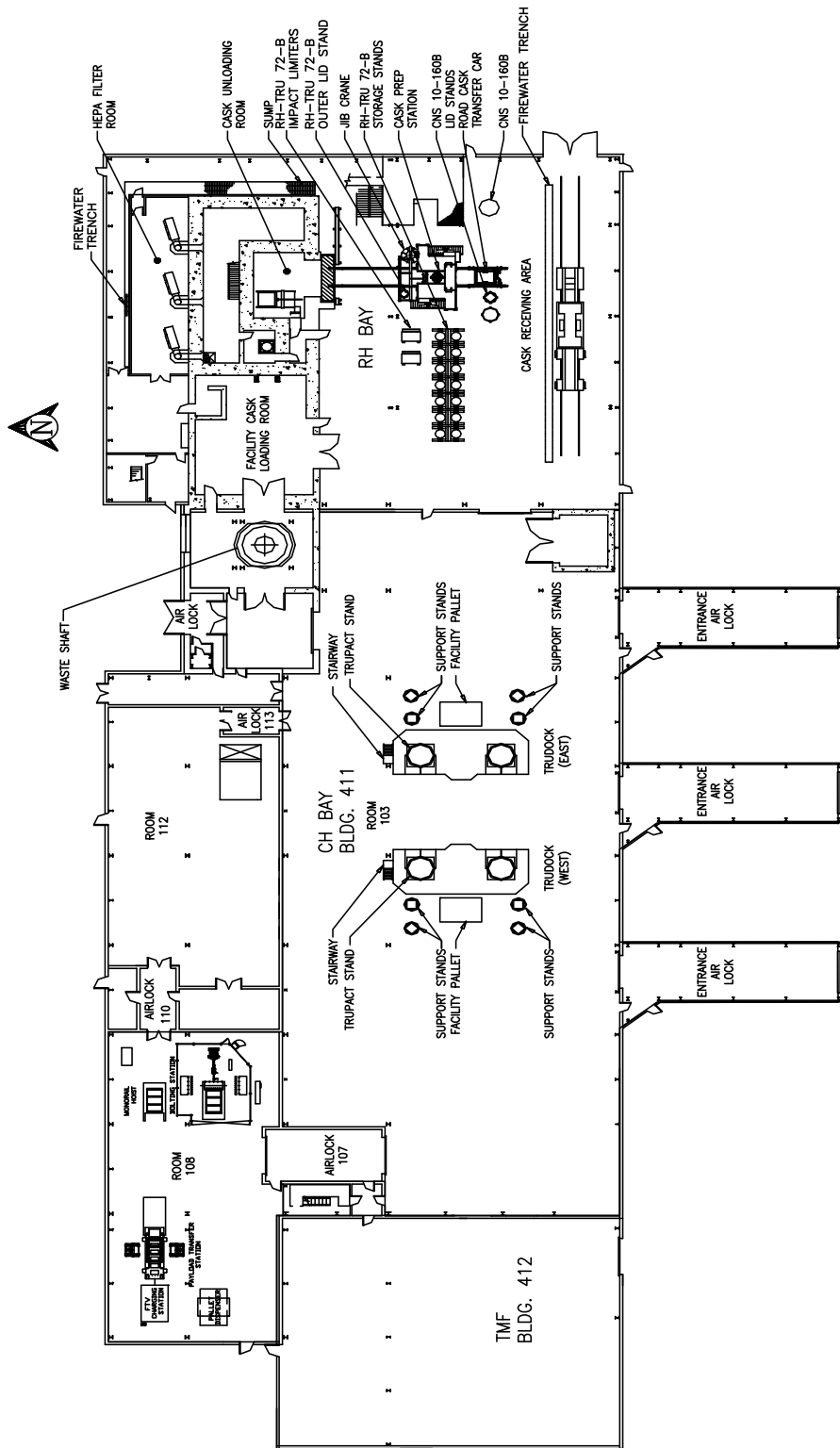


**Figure M-10**  
**RH-TRU 72-B Canister Assembly**

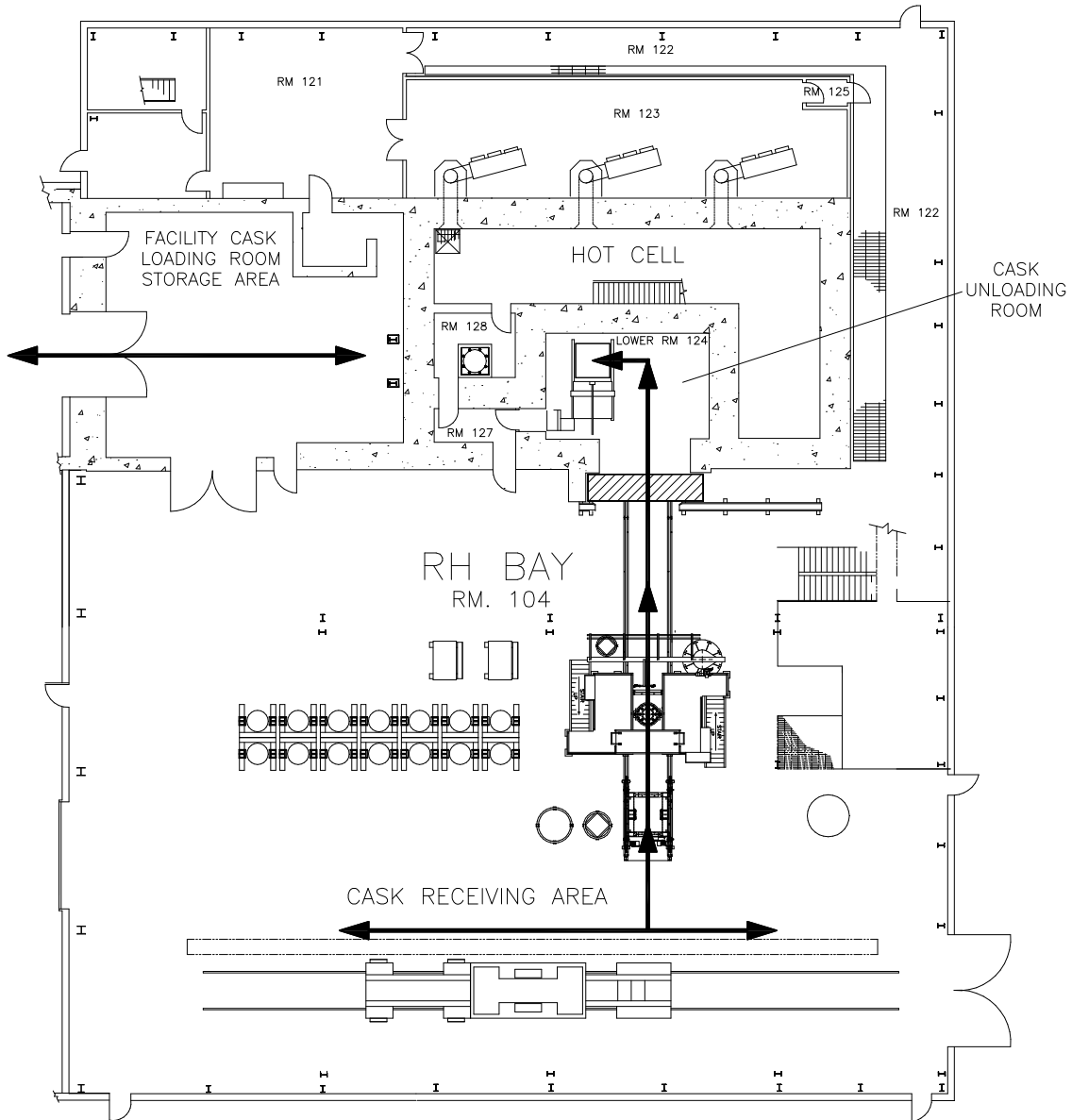




**Figure M-11**  
**Typical Shielded Container**



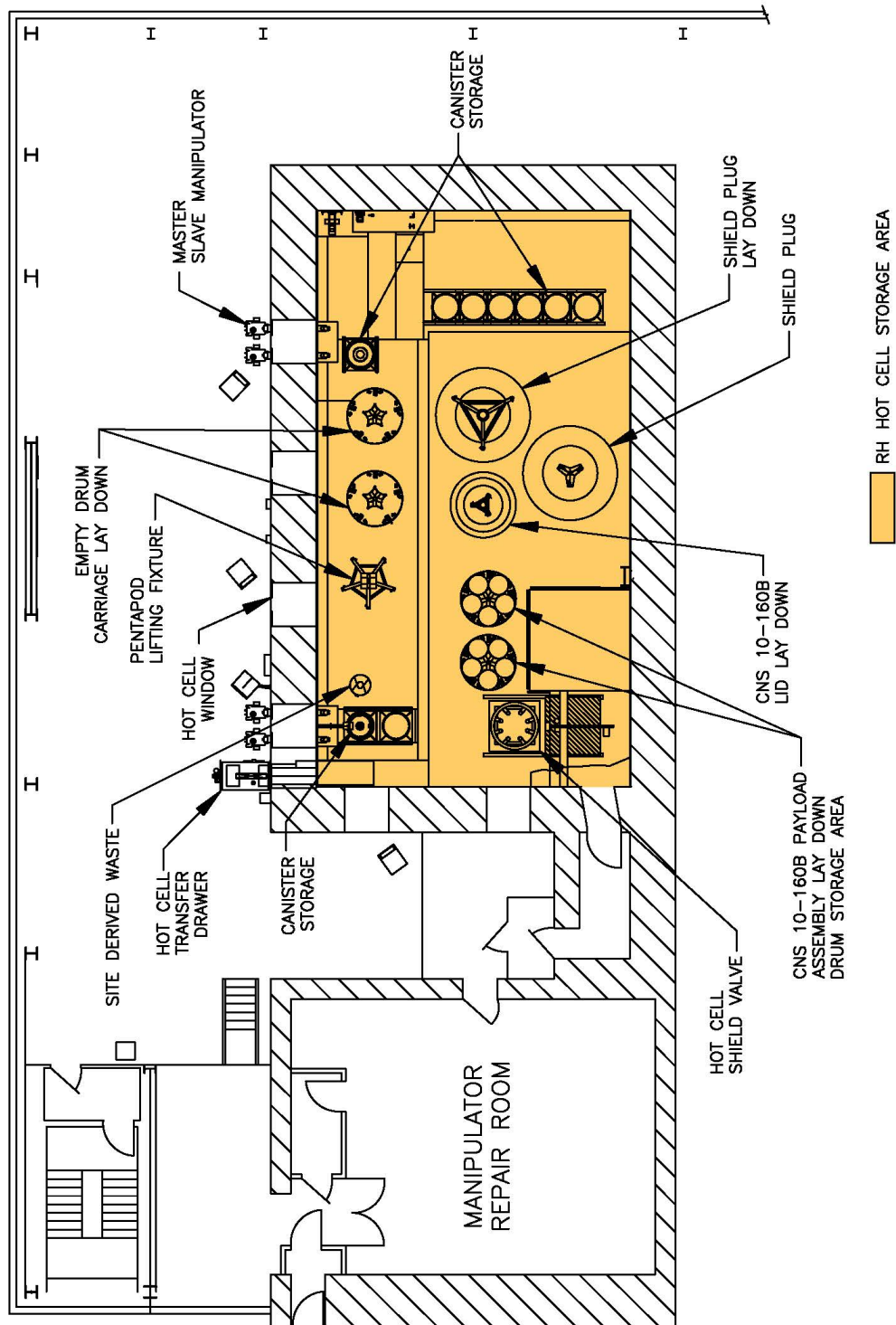
**Figure M-12**  
**Waste Handling Building Plan (Ground Floor)**



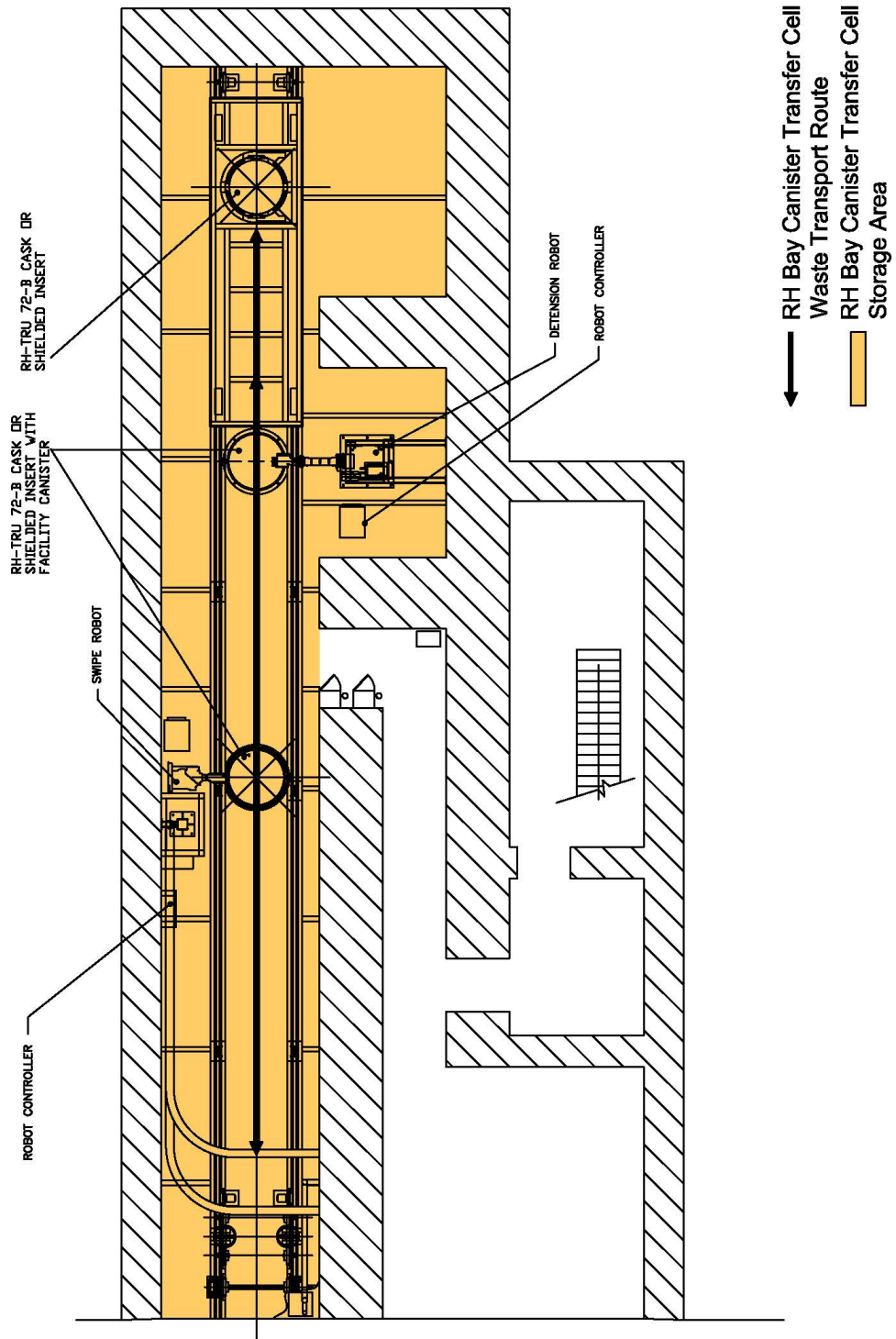
← RH BAY WASTE TRANSPORT ROUTES

NOTE: RH BAY FLOOR, HOT CELL – LOWER FLOOR, AND CASK LOADING ROOM CONSIDERED 0 FOOT ELEVATION

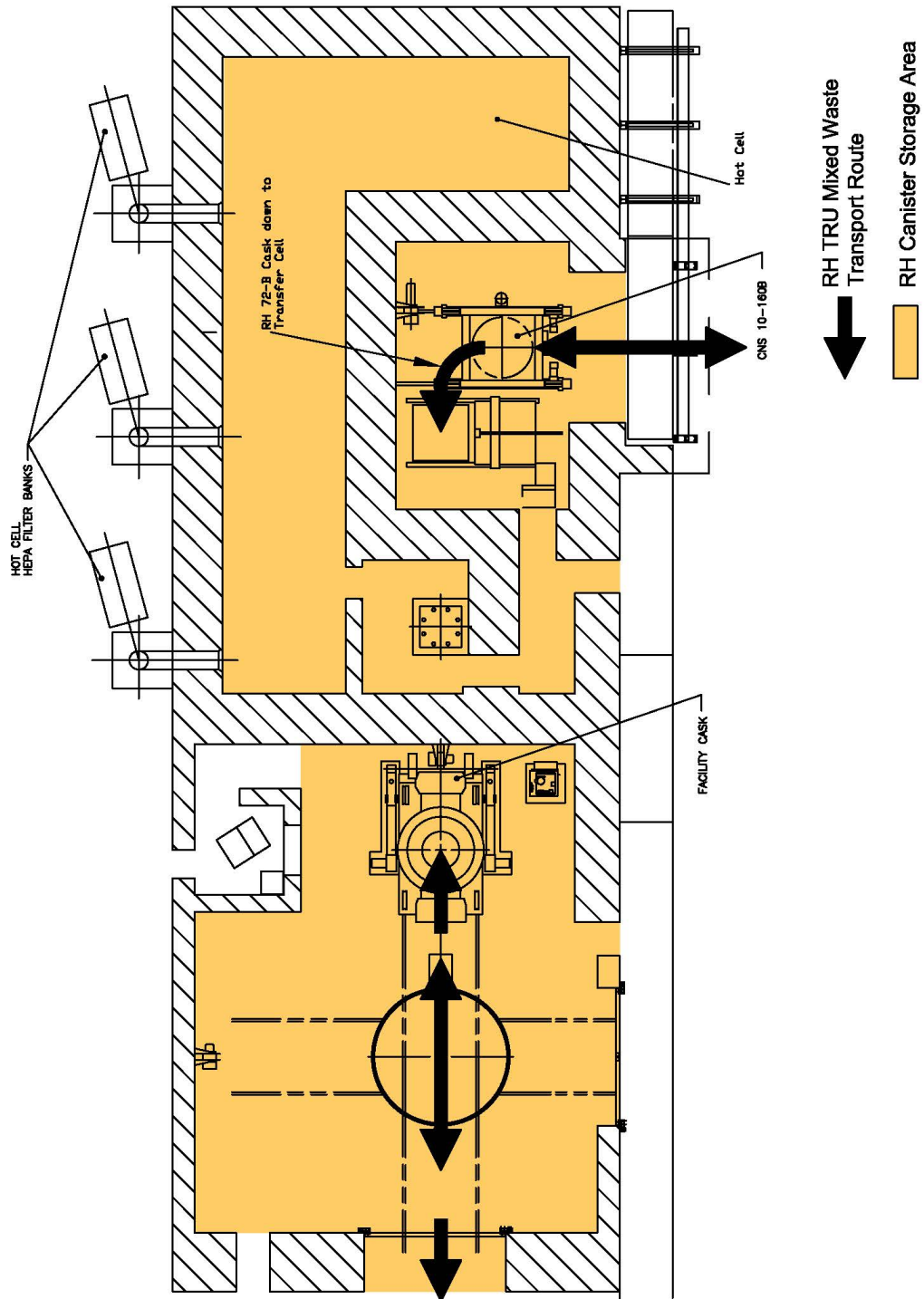
**Figure M-13**  
**RH Bay Ground Floor and Waste Transport Routes**



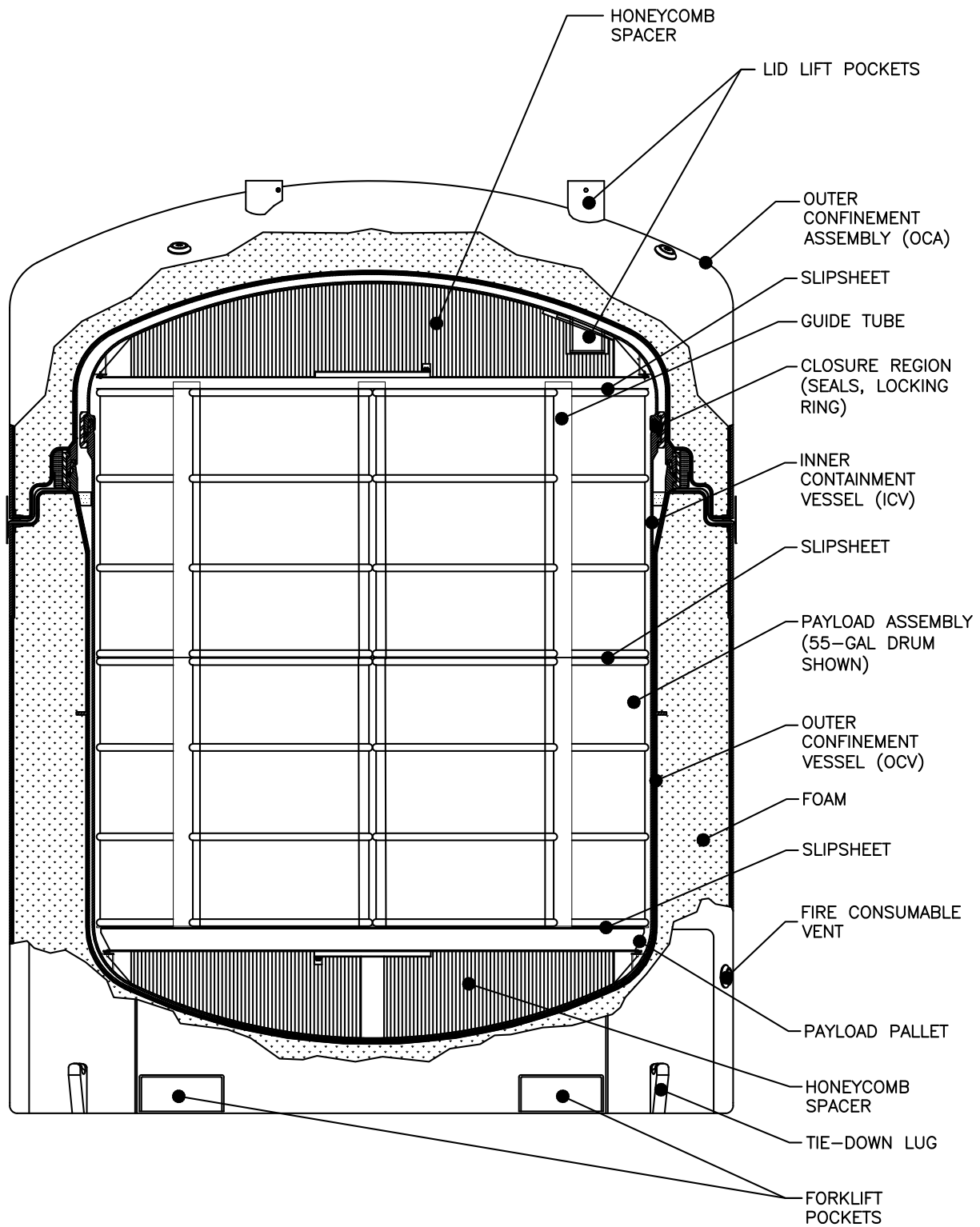
**Figure M-14**  
**RH Hot Cell Storage Area**



**Figure M-15**  
**RH Canister Transfer Cell Storage Area and Waste Transport Route**

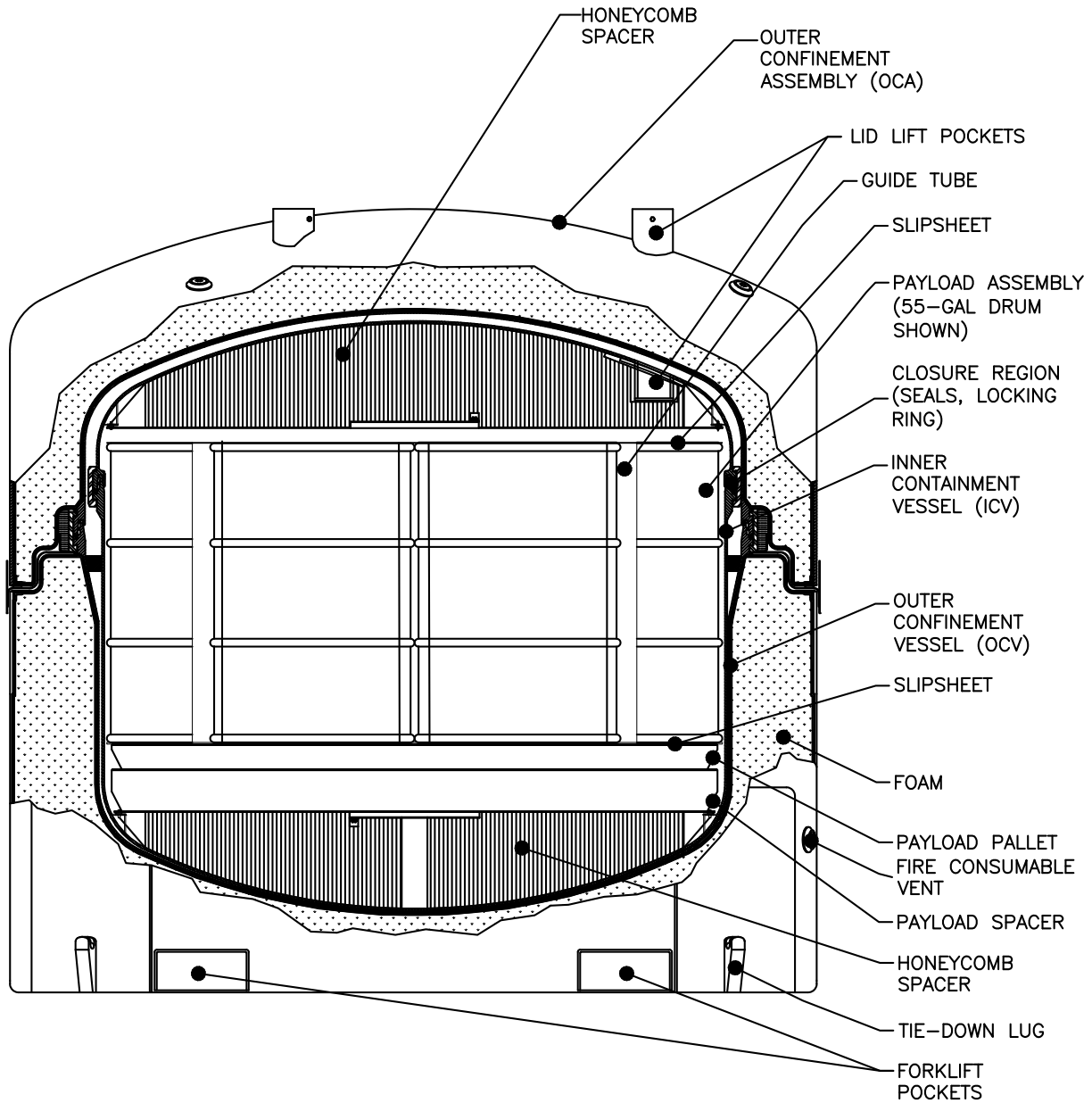


**Figure M-16**  
**RH Facility Cask Loading Room and Cask Unloading Storage Area and Waste Transport Route**

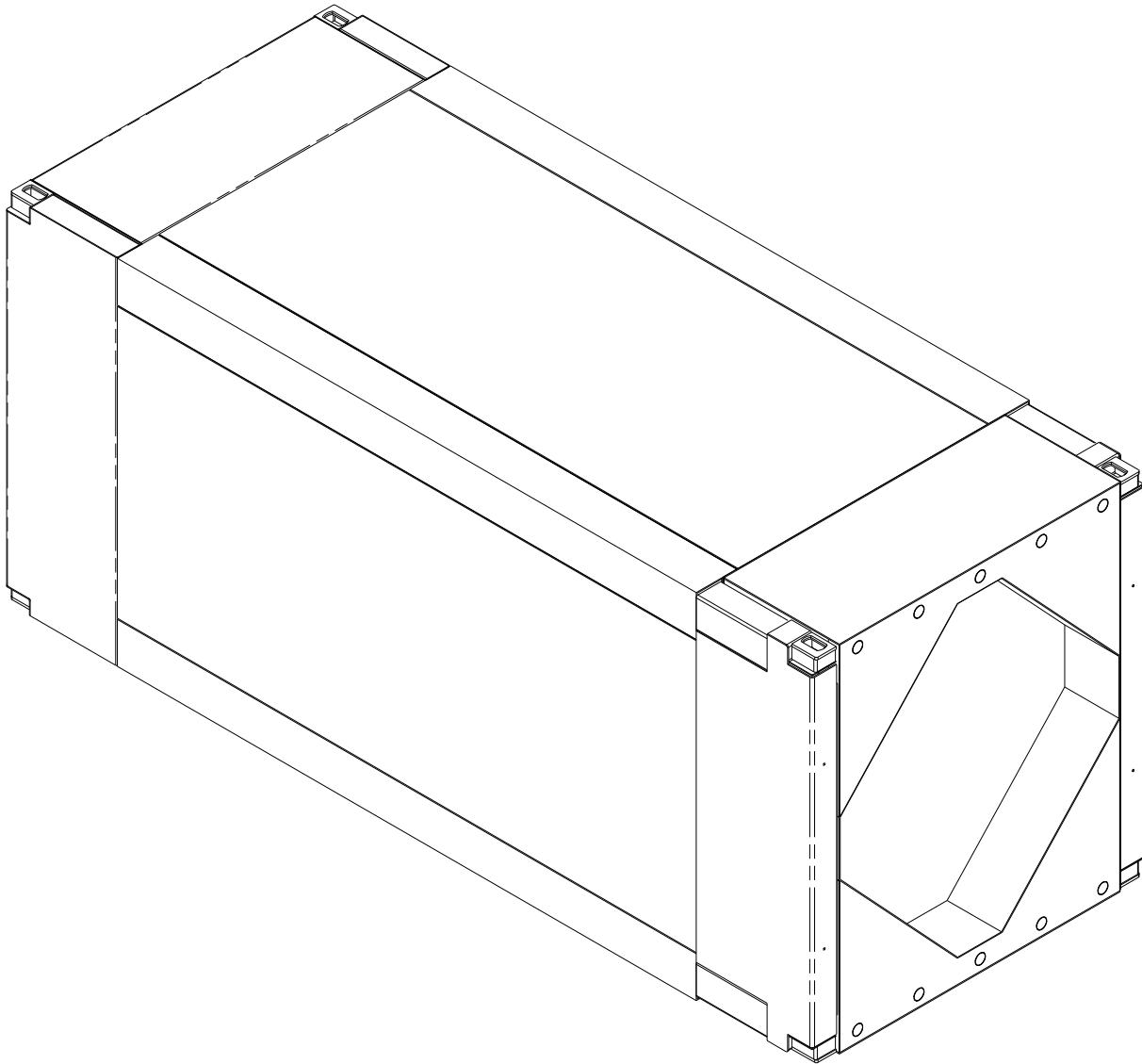


**Figure M-17**  
**TRUPACT-II Type B Shipping Container**

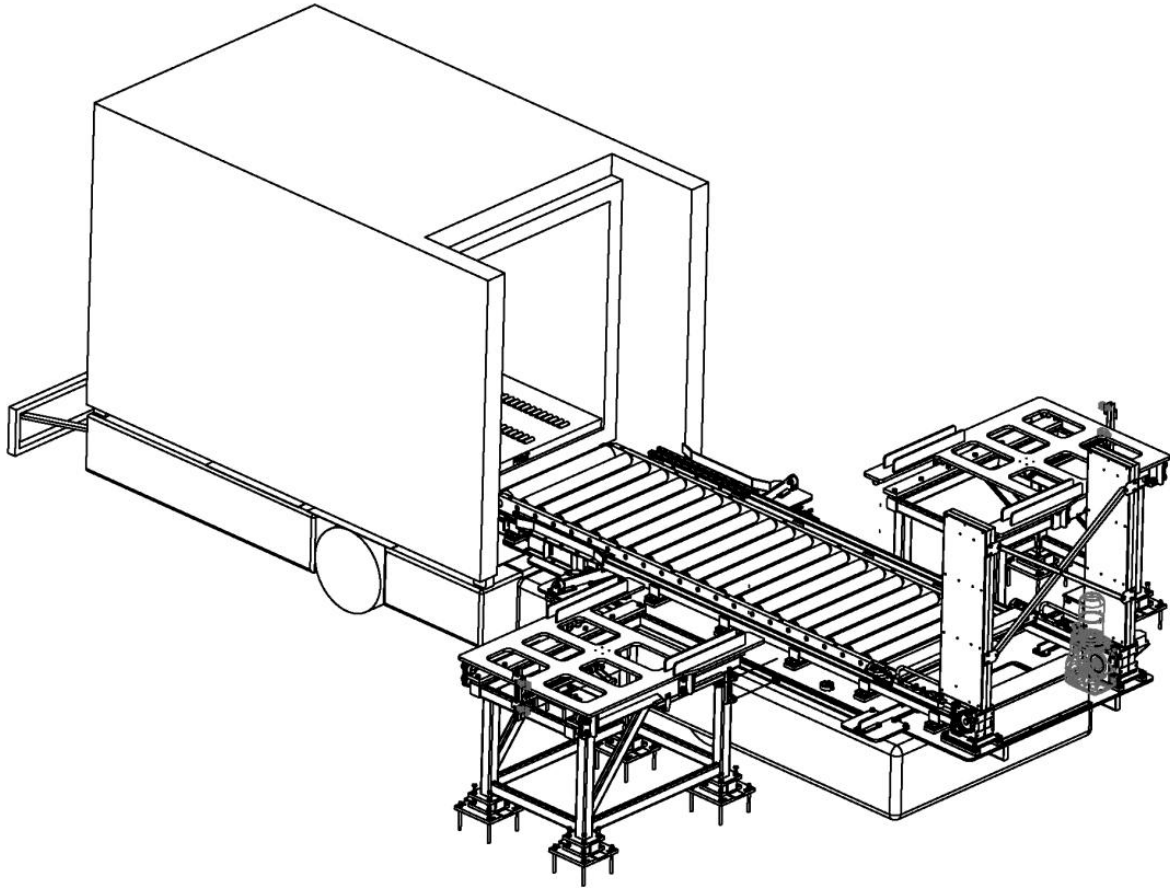




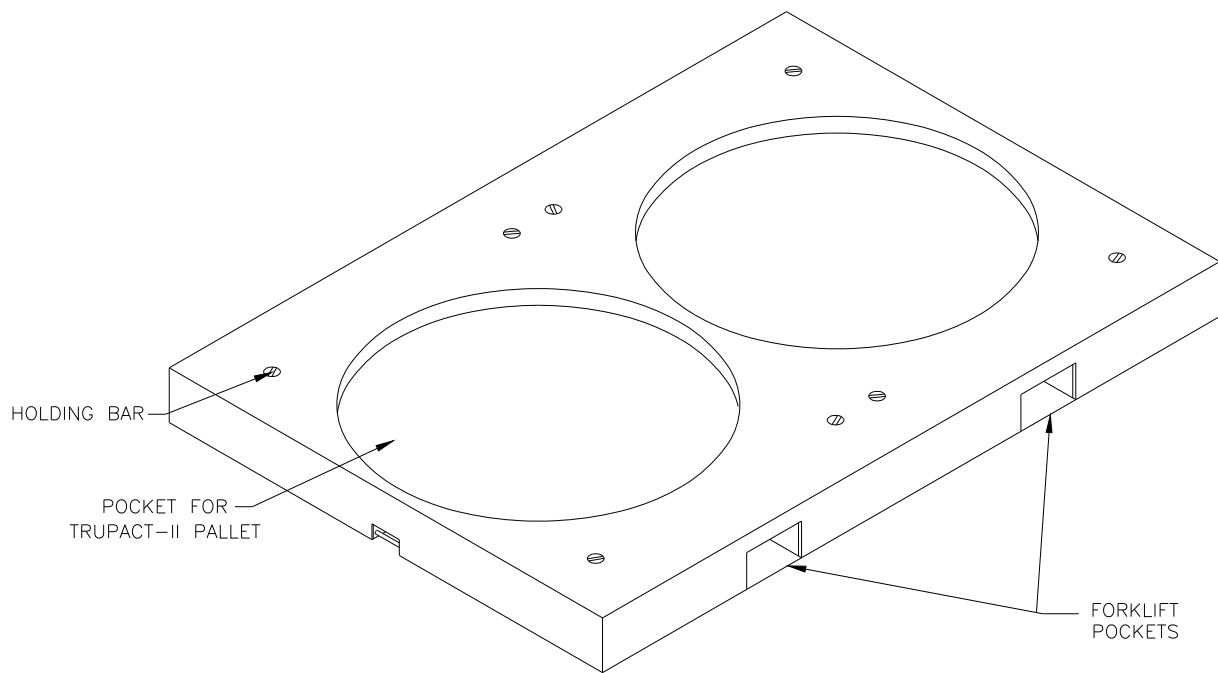
**Figure M-18**  
**Typical HalfPACT Type B Shipping Container**



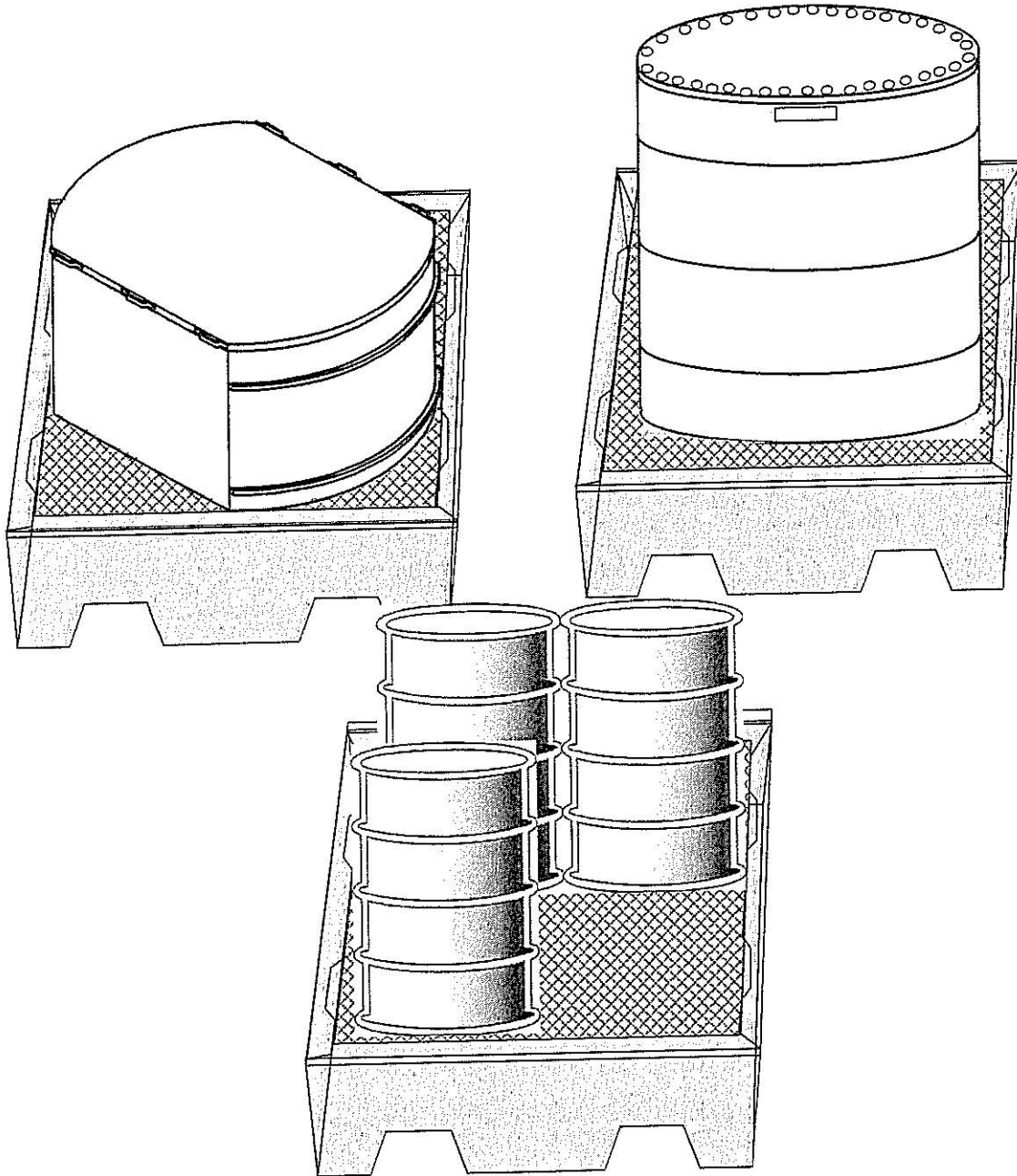
**Figure M-19**  
**Typical TRUPACT-III Type B Shipping Container**



**Figure M-20**  
**Payload Transfer Station**

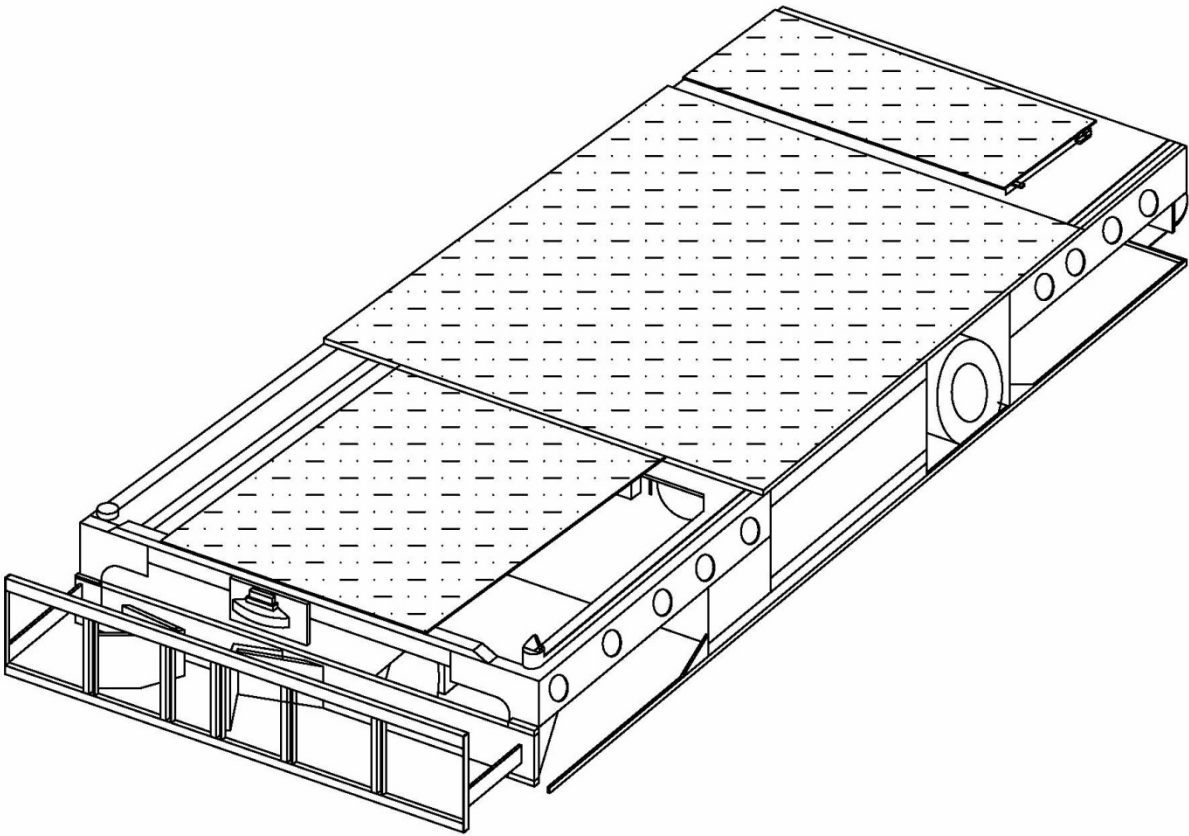


**Figure M-21  
Facility Pallet**



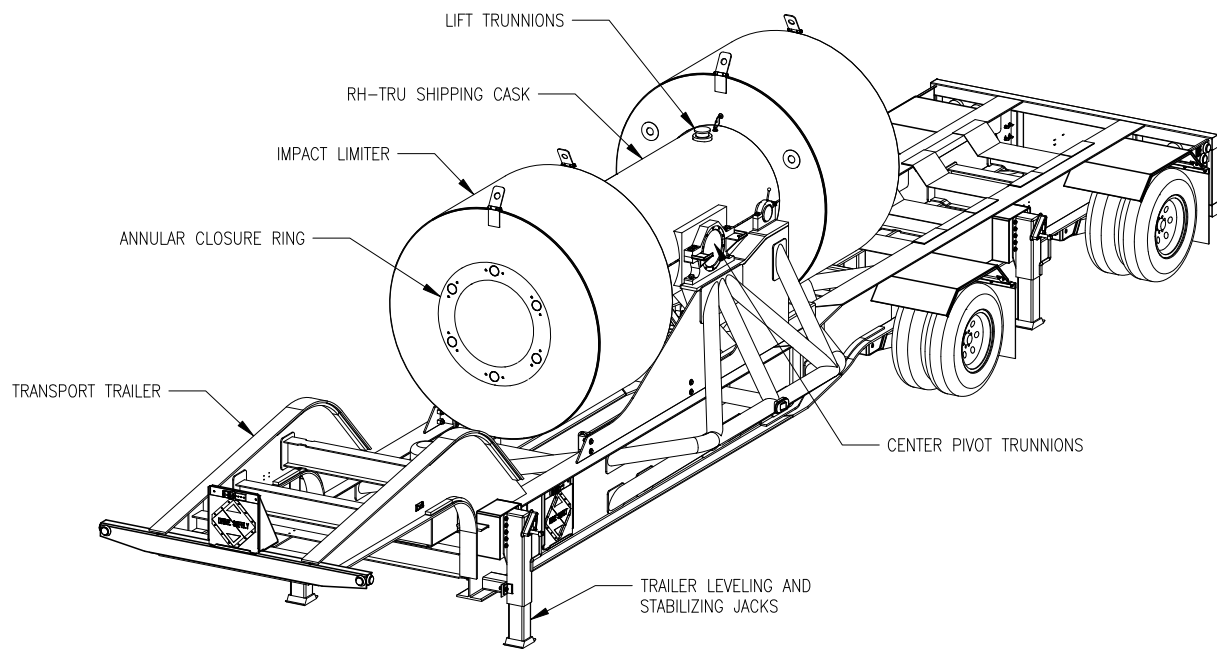
**Figure M-22**  
**Typical Containment Pallet**



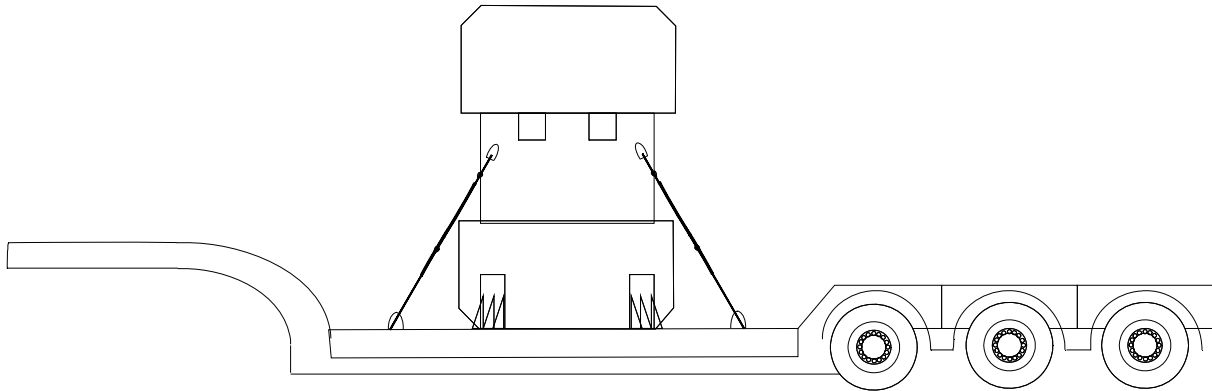


**Figure M-24**  
**Typical Yard Transfer Vehicle**

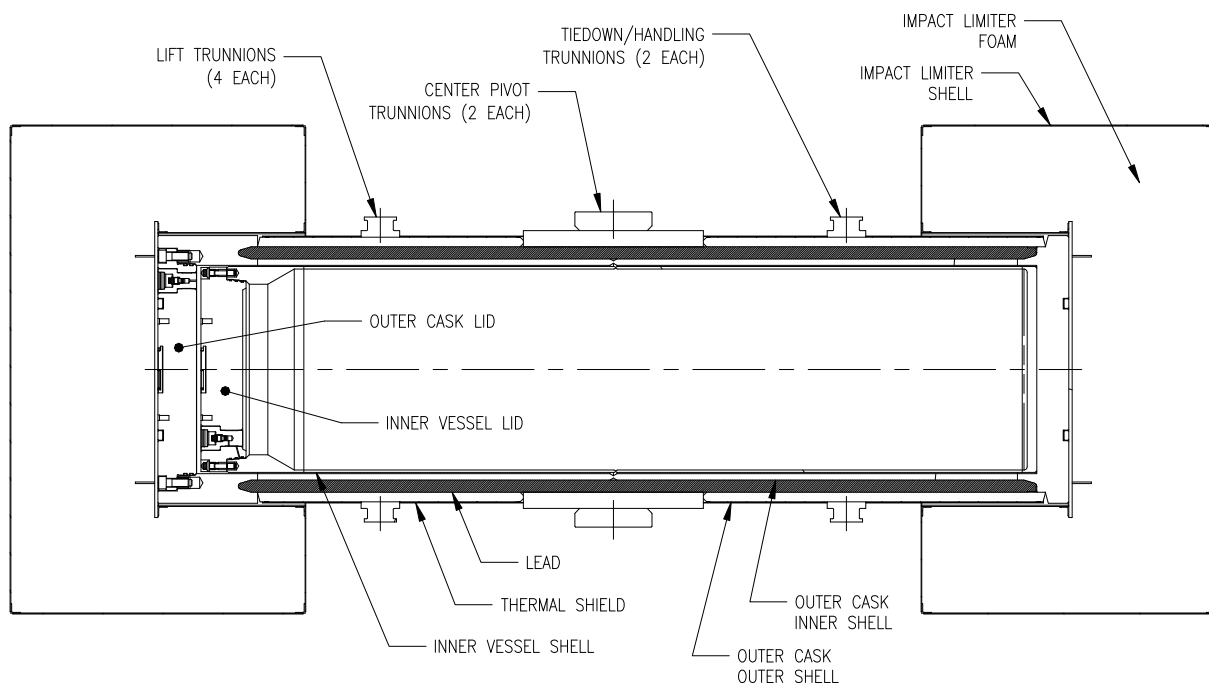




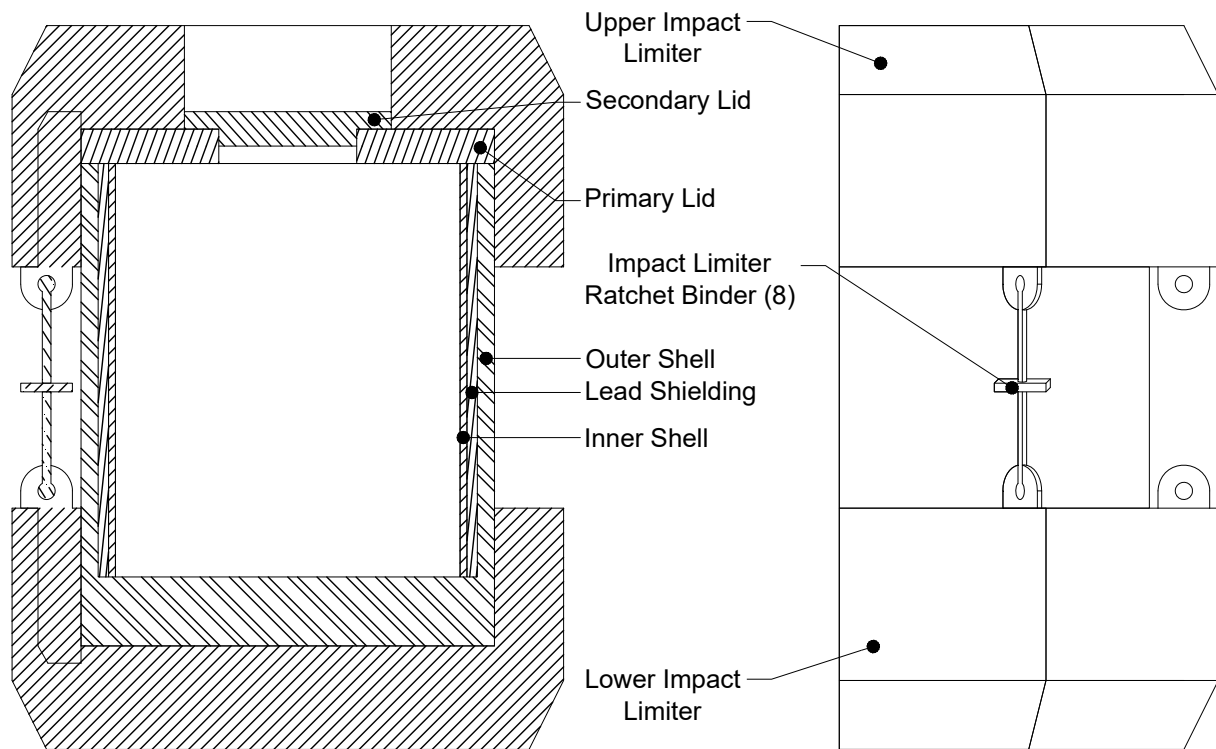
**Figure M-25**  
**RH TRU 72-B Shipping Cask on Trailer**



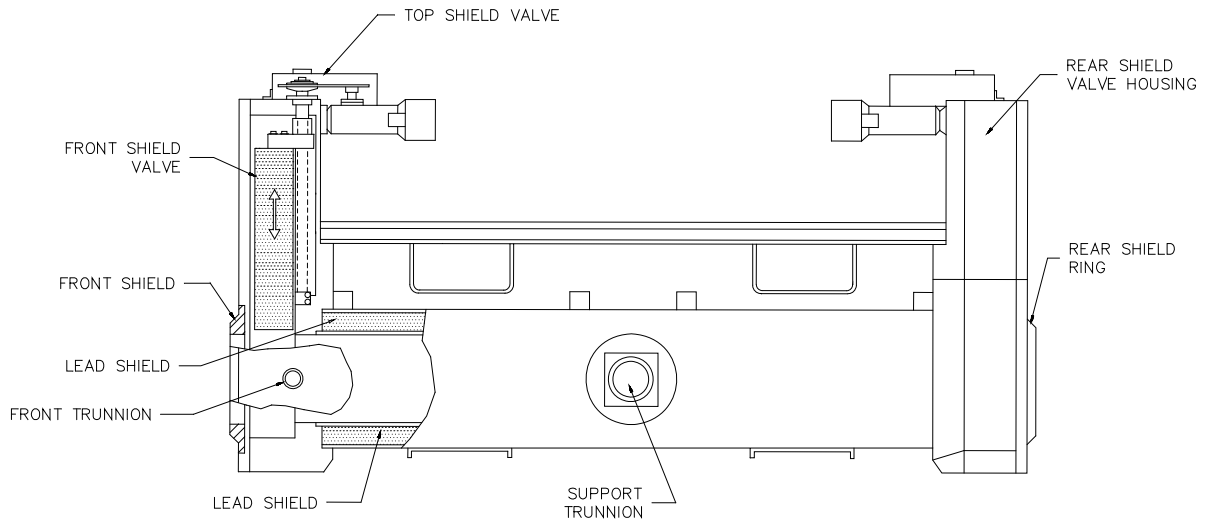
**Figure M-26**  
**CNS 10-160B Shipping Cask on Trailer**



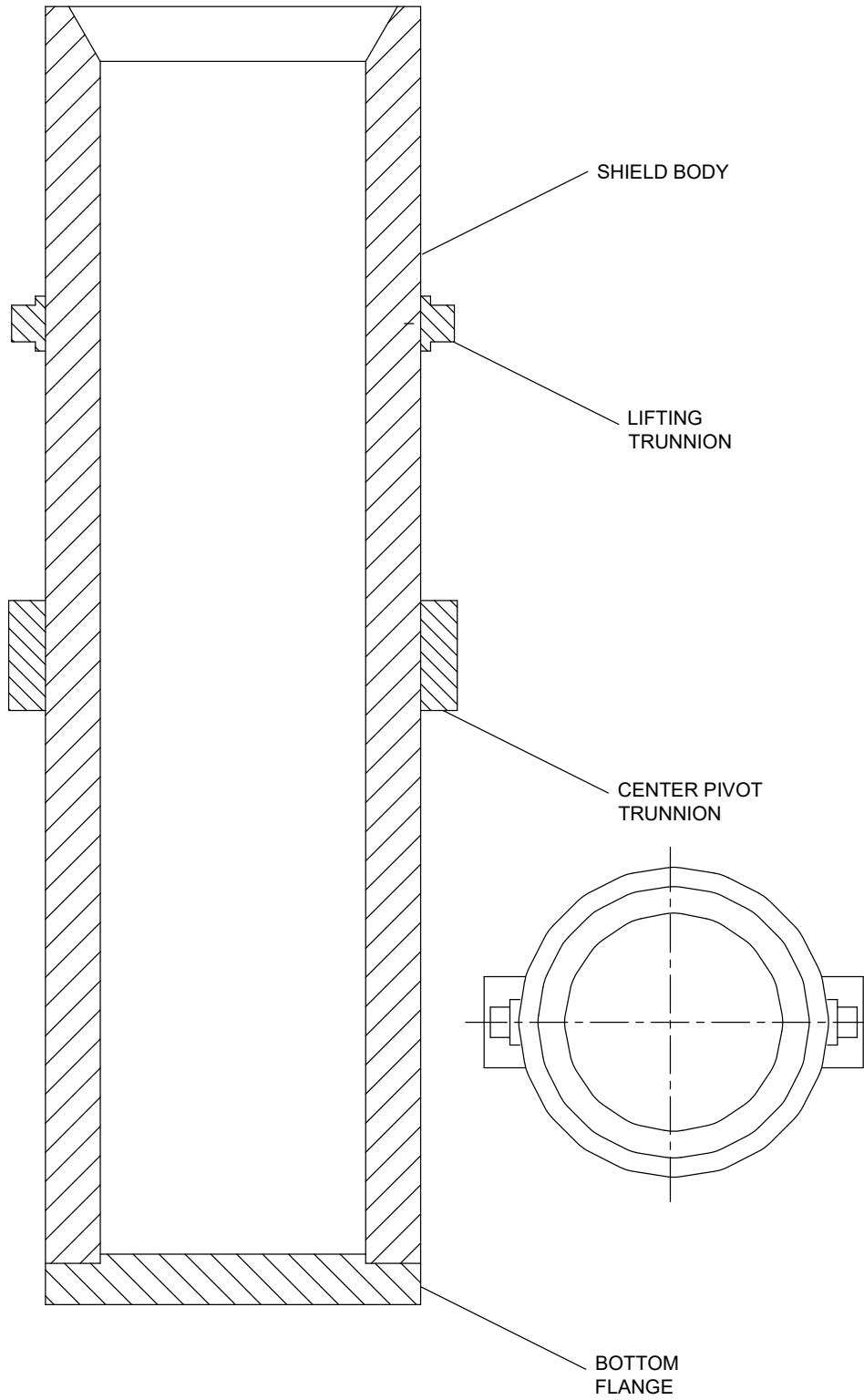
**Figure M-27**  
**RH-TRU 72-B Type B Shipping Cask**



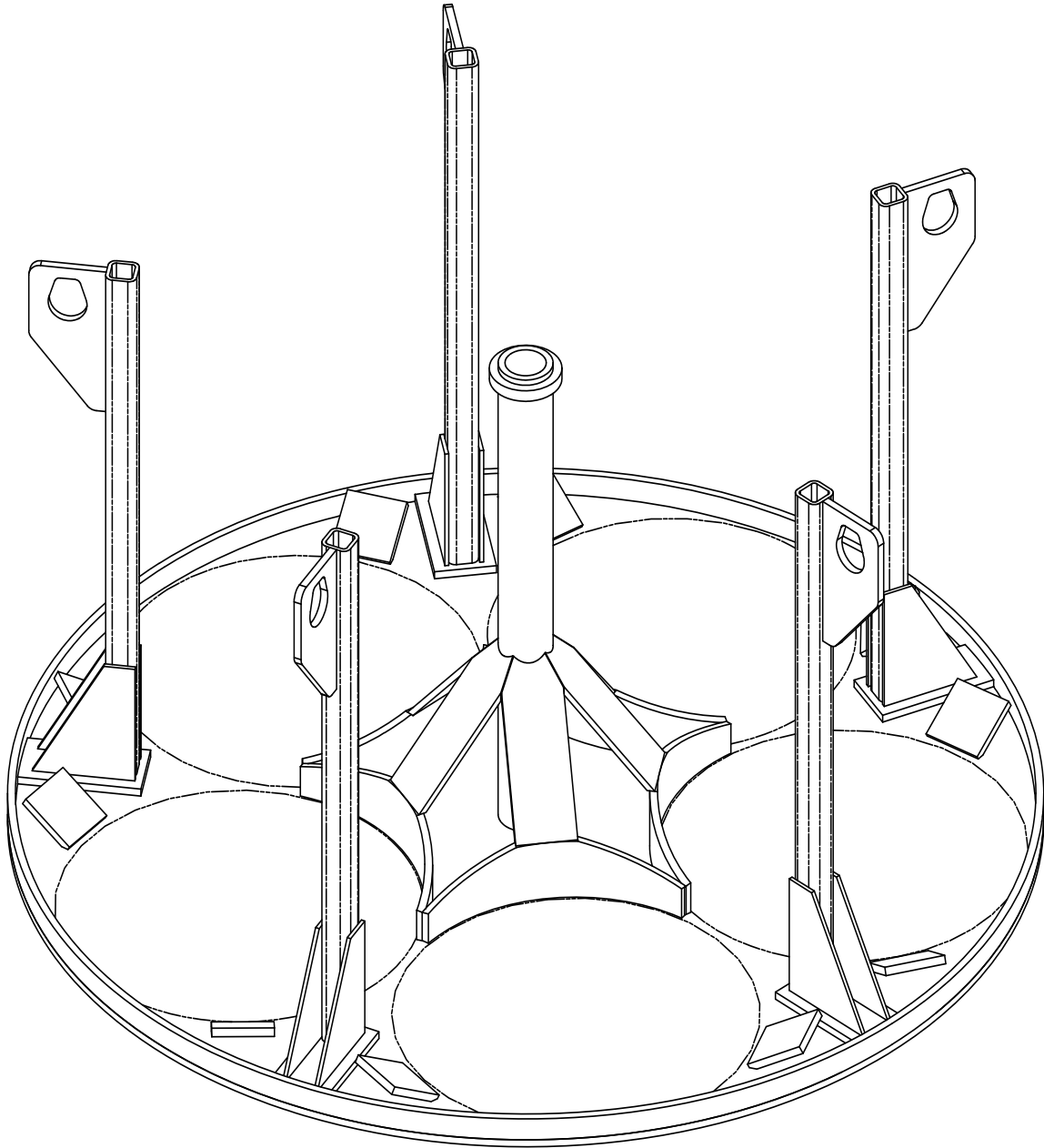
**Figure M-28**  
**CNS 10-160B Type B Shipping Cask**



**Figure M-29**  
**RH Transuranic Waste Facility Cask and Light Weight Facility Cask**

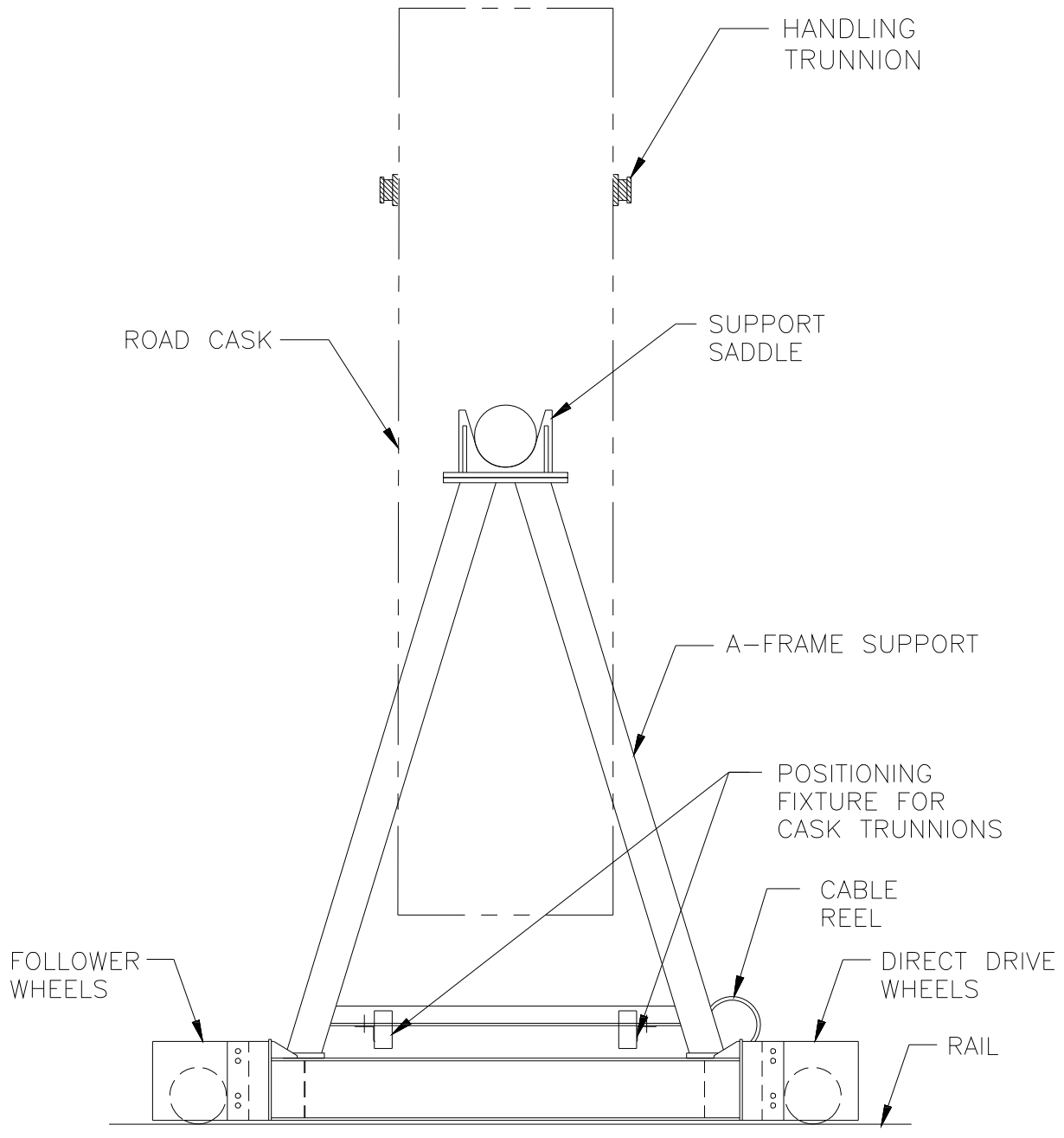


**Figure M-30**  
**RH Shielded Insert Assembly**

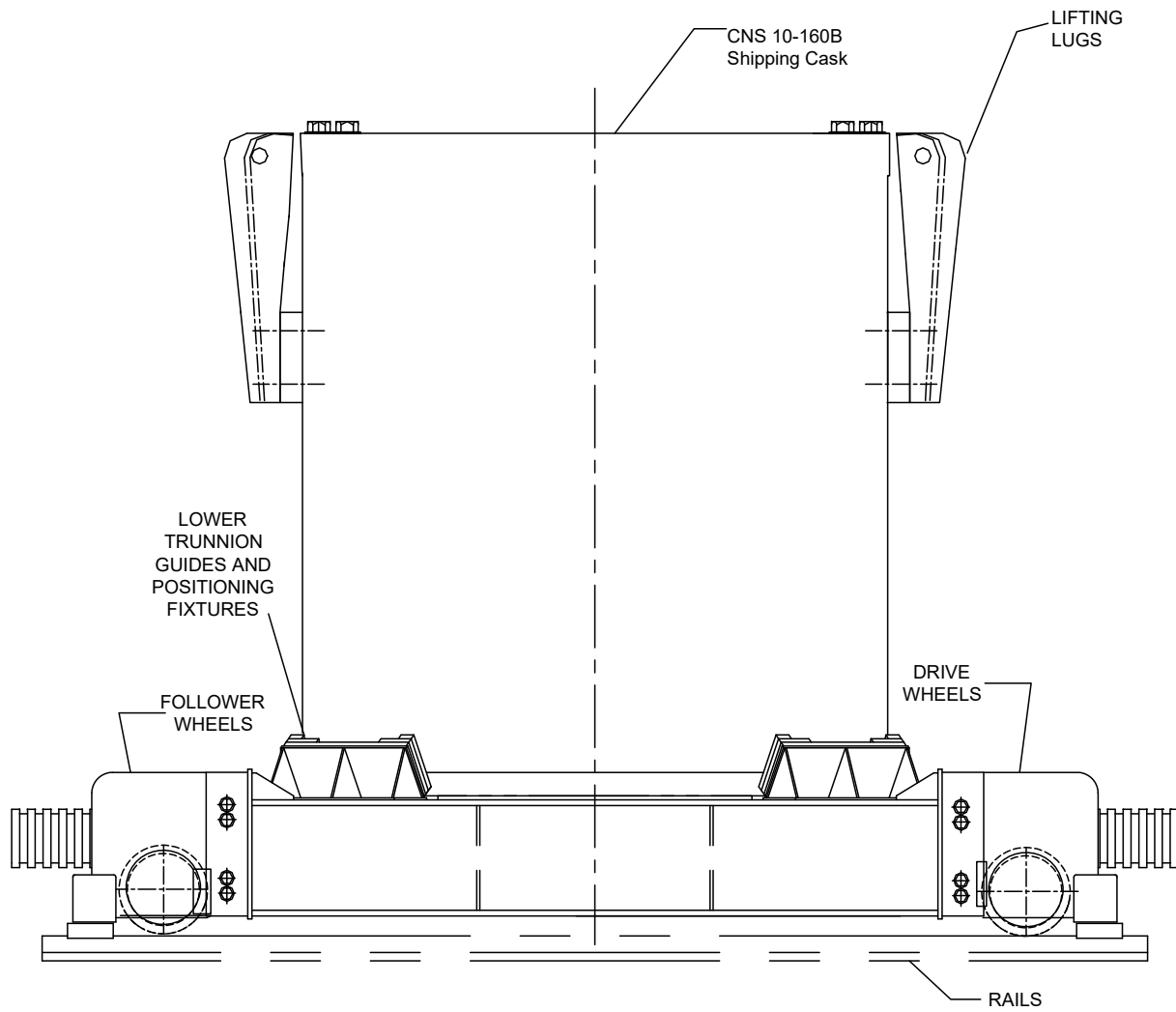


**Figure M-31**  
**CNS 10-160B Drum Carriage**

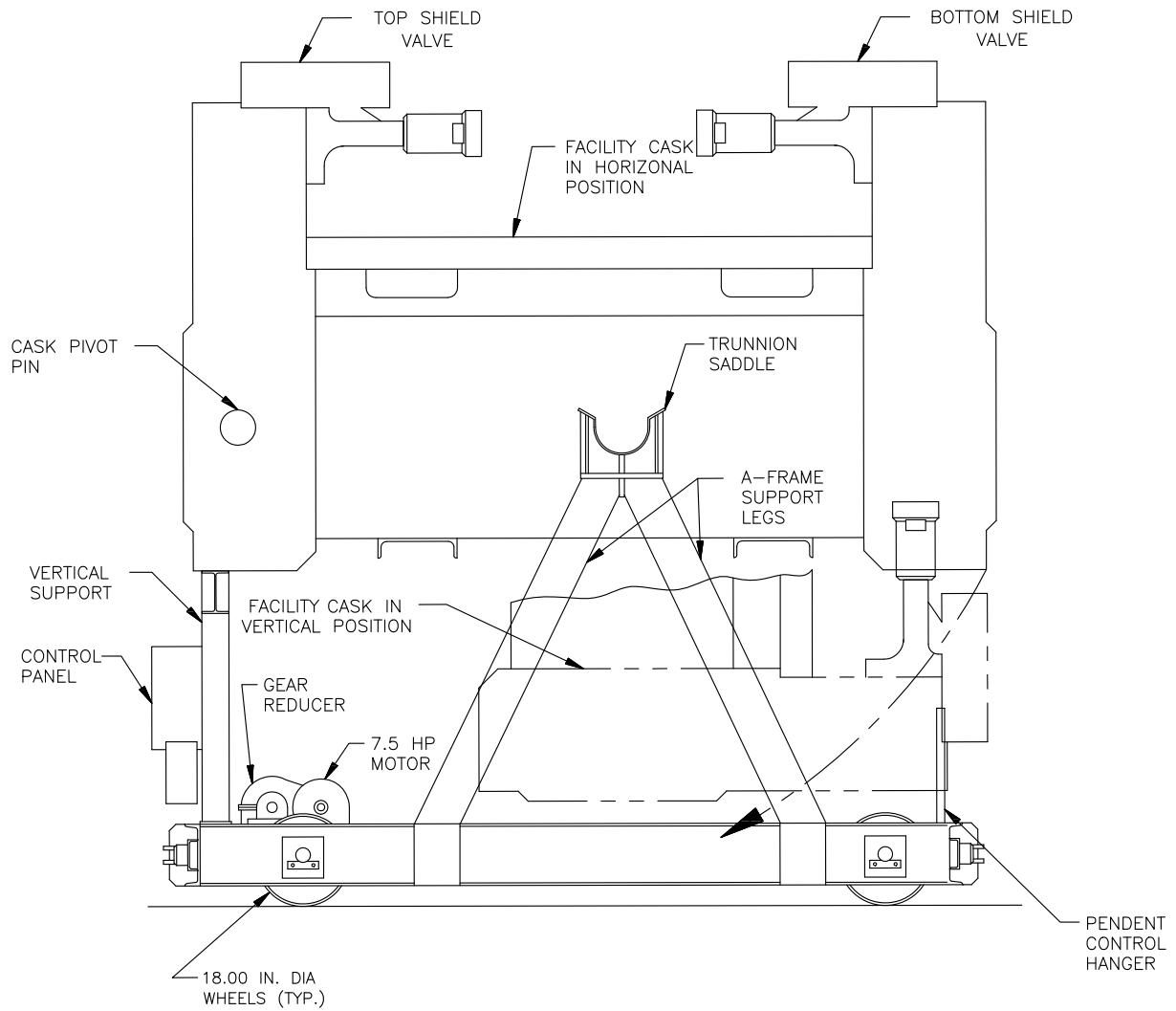




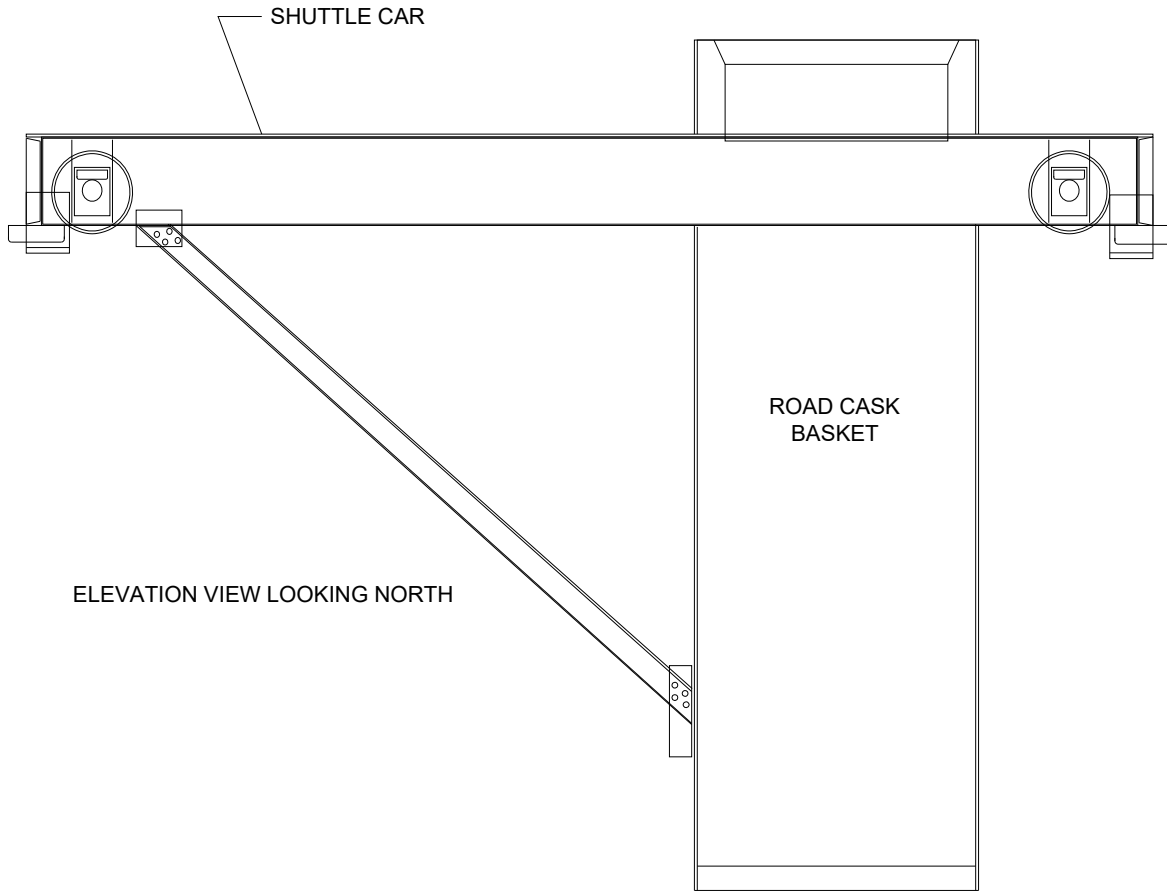
**Figure M-32**  
**RH-TRU 72-B Cask Transfer Car**



**Figure M-33**  
**CNS 10-160B Cask Transfer Car**

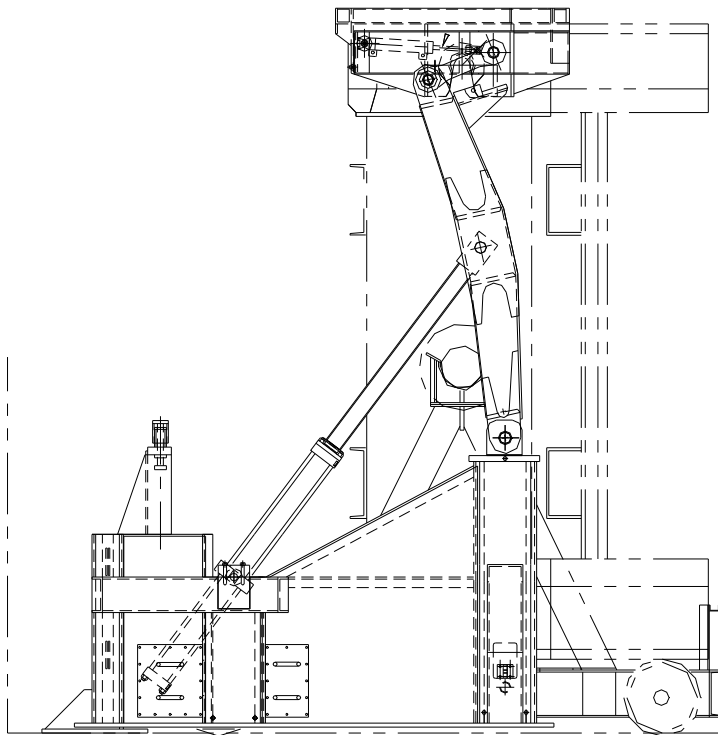


**Figure M-34**  
**RH Facility Cask Transfer Car (Side View)**

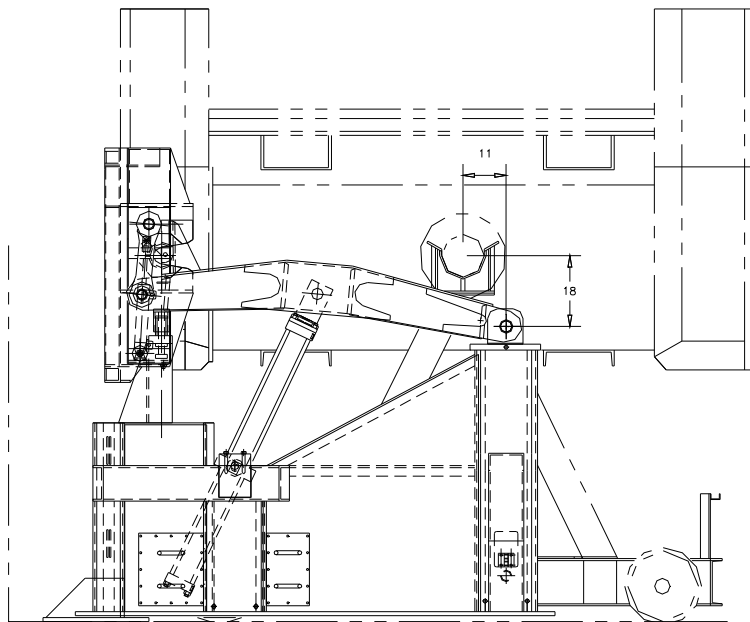


ELEVATION VIEW LOOKING NORTH

**Figure M-35**  
**Transfer Cell Shuttle Car**

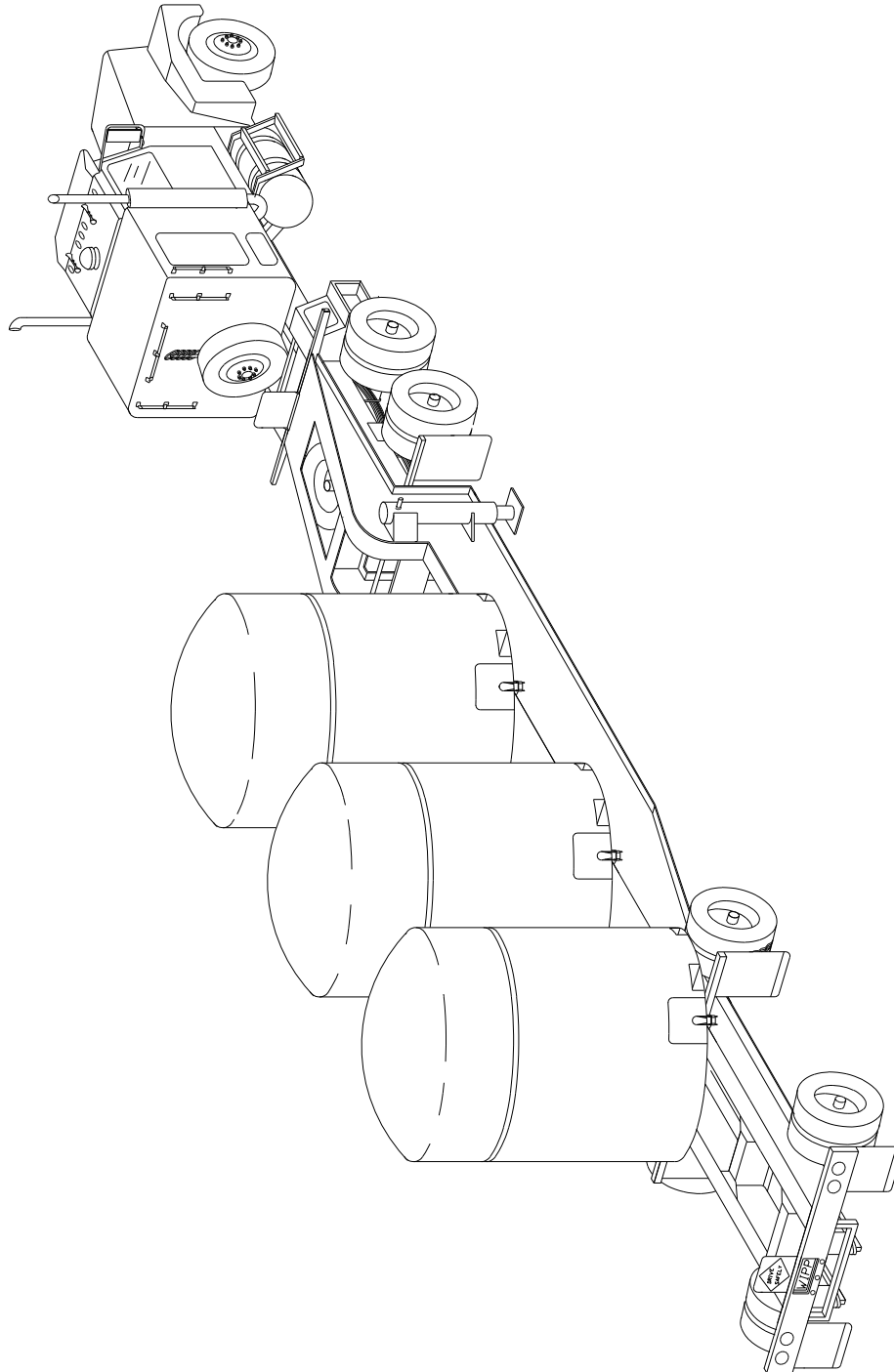


FRONT ELEVATION  
CASK VERTICAL

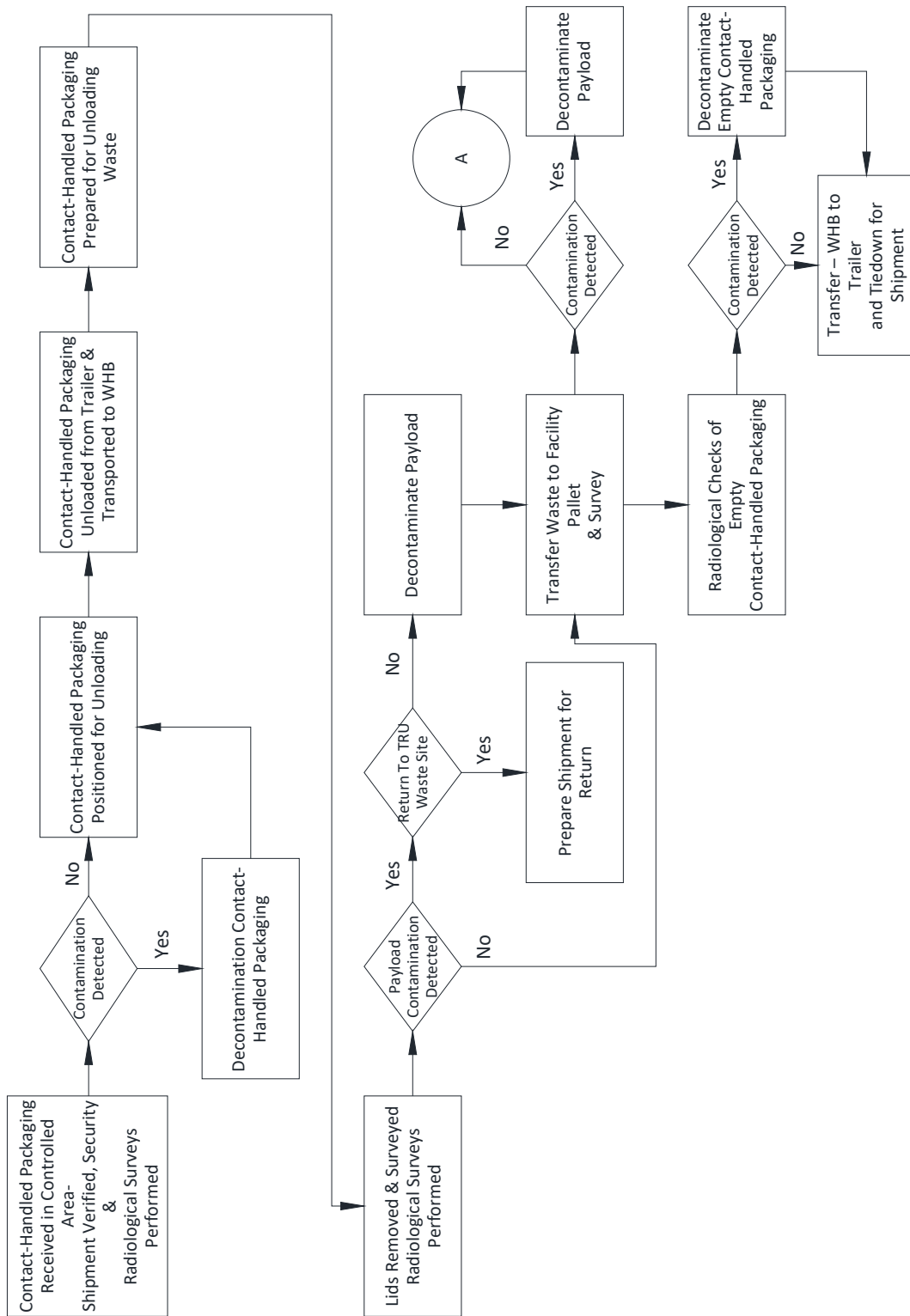


FRONT ELEVATION  
CASK HORIZONTAL

**Figure M-36**  
**Facility Cask Rotating Device**

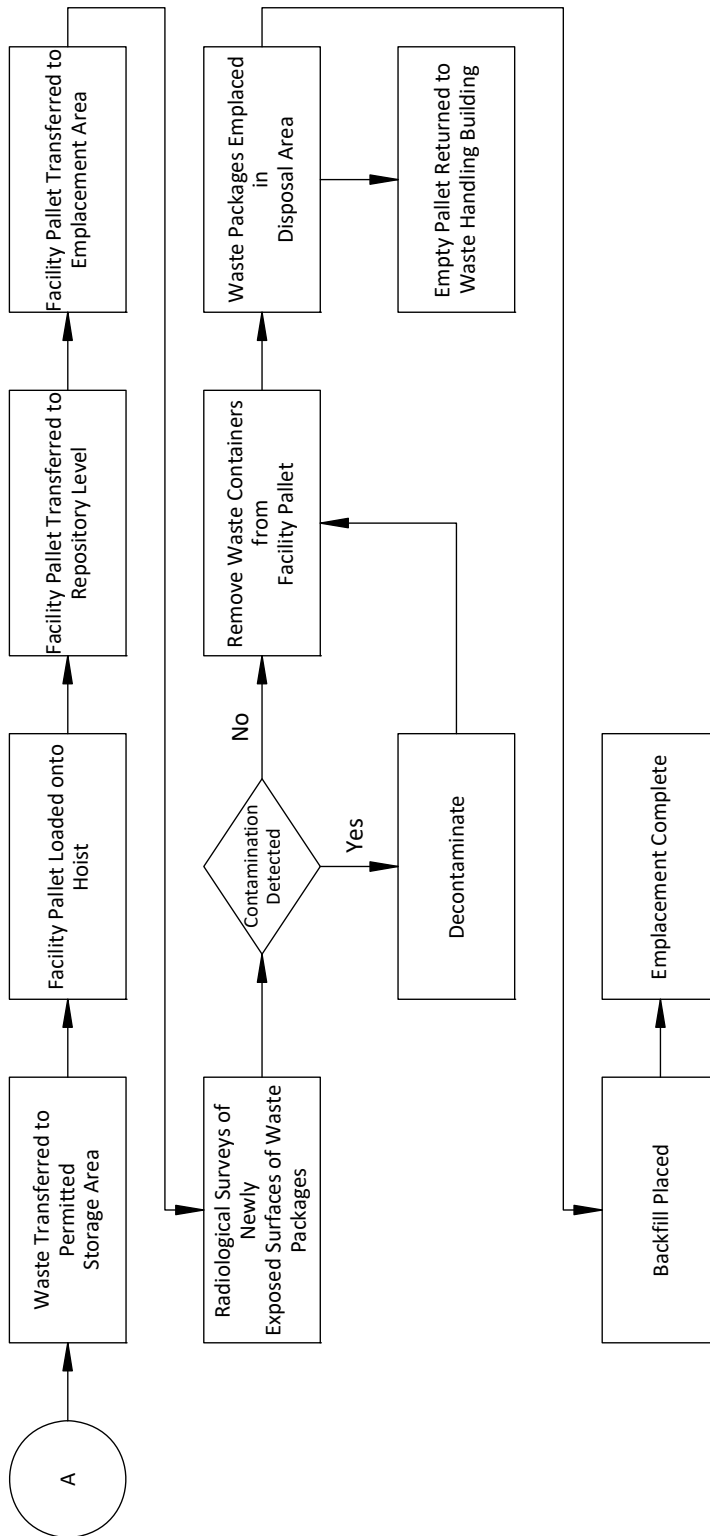


**Figure M-37**  
**TRUPACT-II Containers on Trailer**



**Figure M-38**  
**WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram**





**Figure M-39**  
**WIPP Facility Surface and Underground CH Transuranic Mixed Waste Process Flow Diagram**  
**(Continued)**

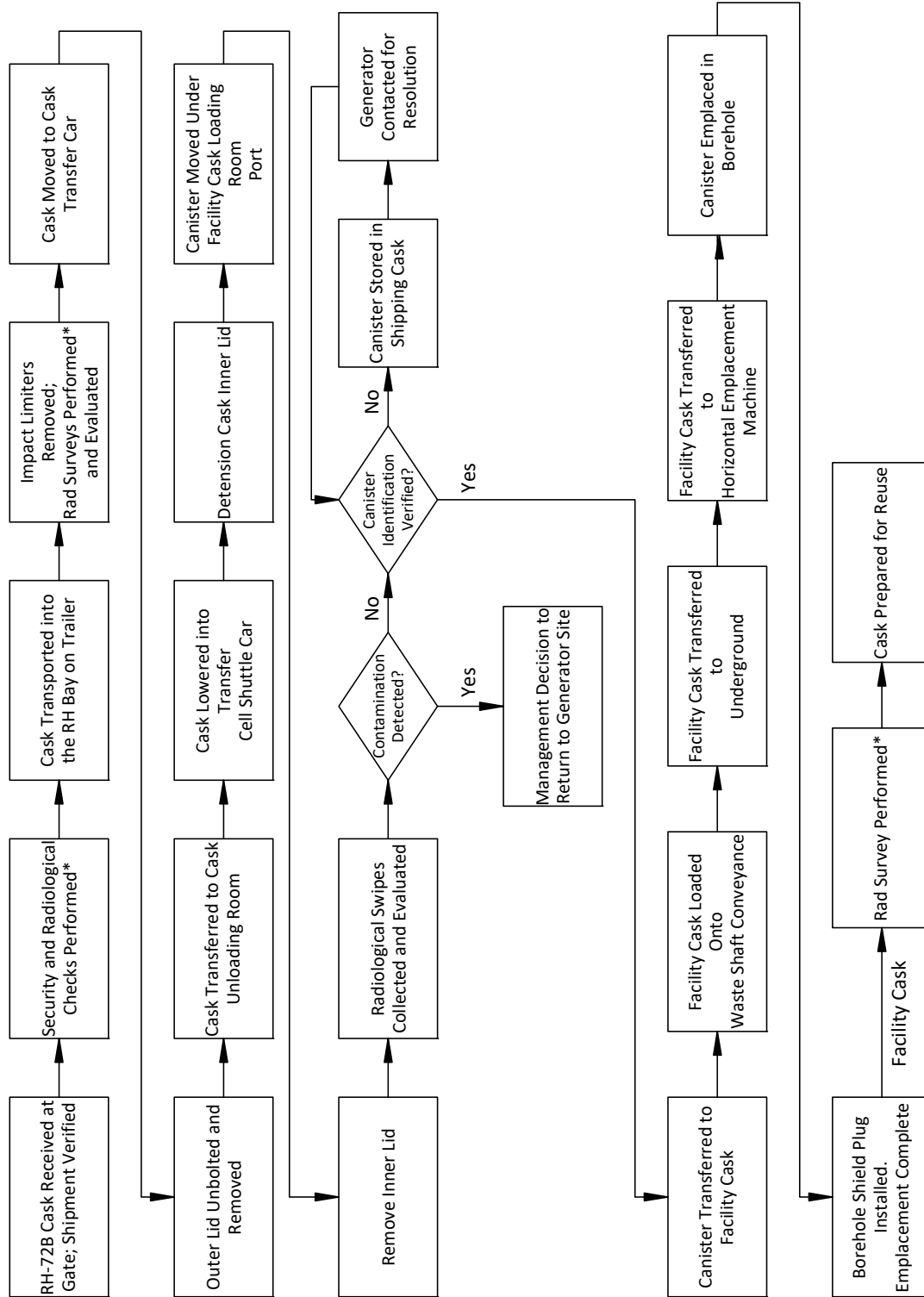
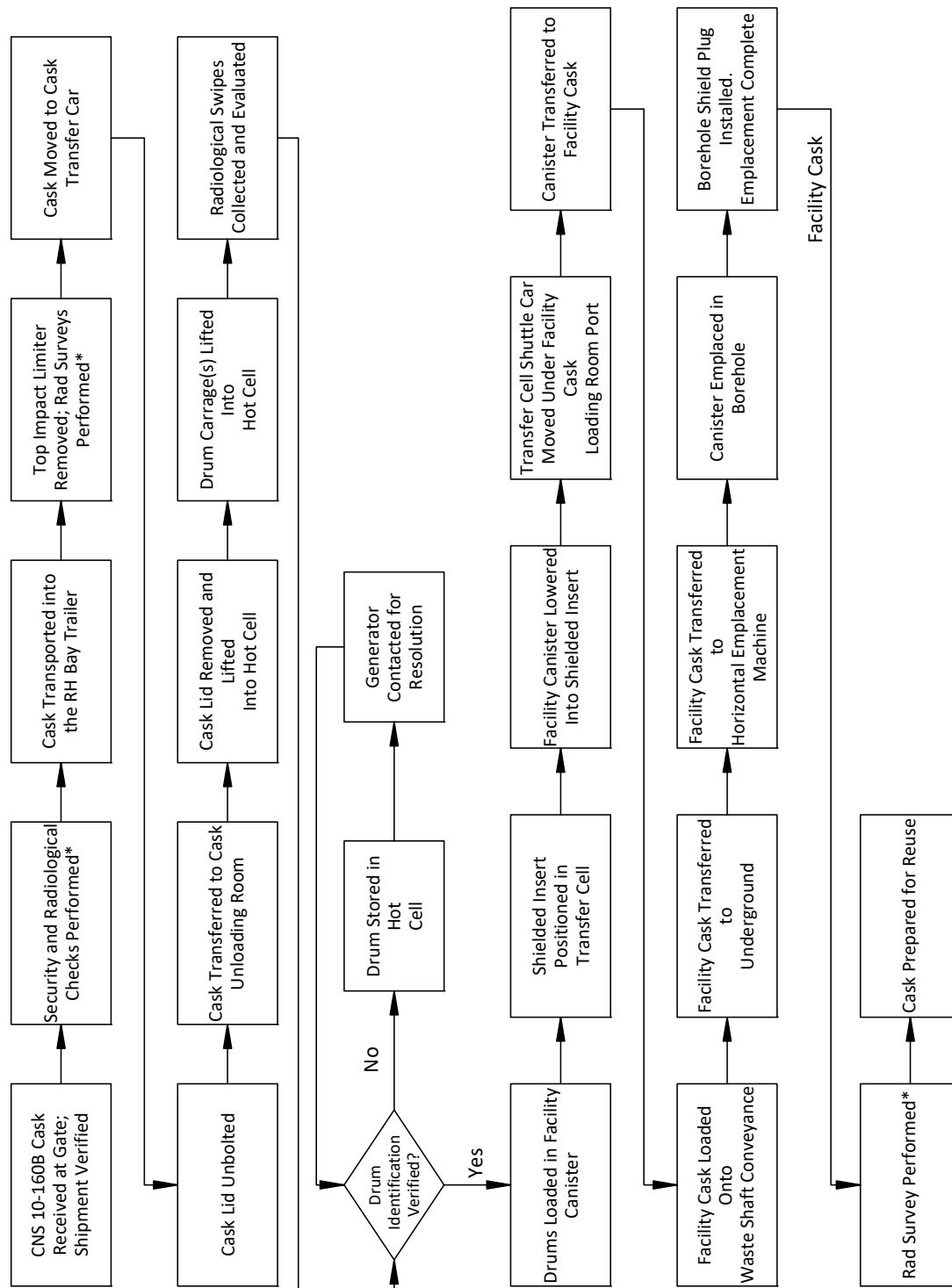


Figure M-40  
 Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for  
 RH-TRU 72-B Shipping Cask

\*If radiological surveys or swipes reveal cask contamination, the cask will be decontaminated.



**Figure M-41**  
**Surface and Underground RH Transuranic Mixed Waste Process Flow Diagram for CNS 10-160B Shipping Cask**

\*If radiological surveys or swipes reveal cask contamination, the cask will be decontaminated.

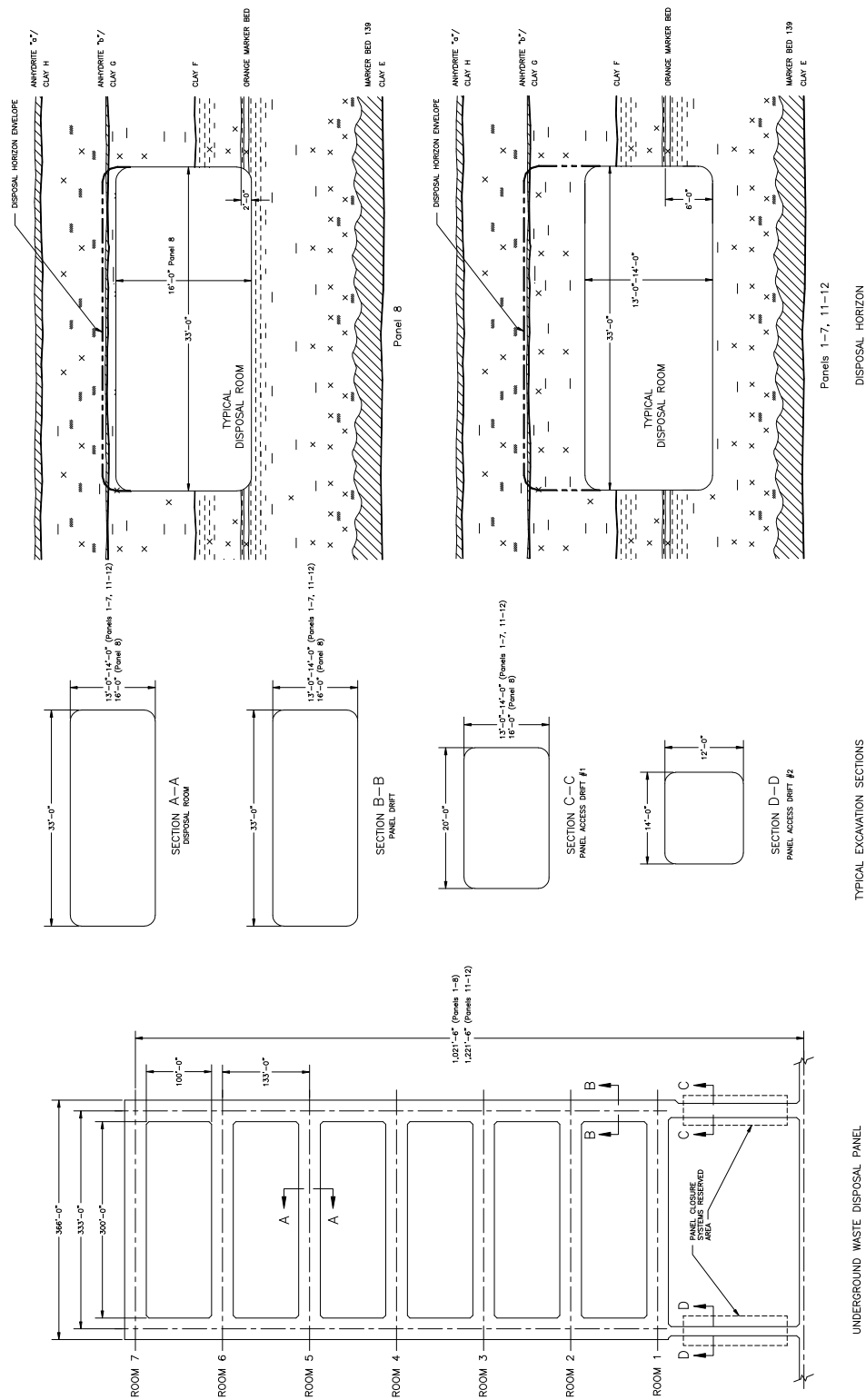
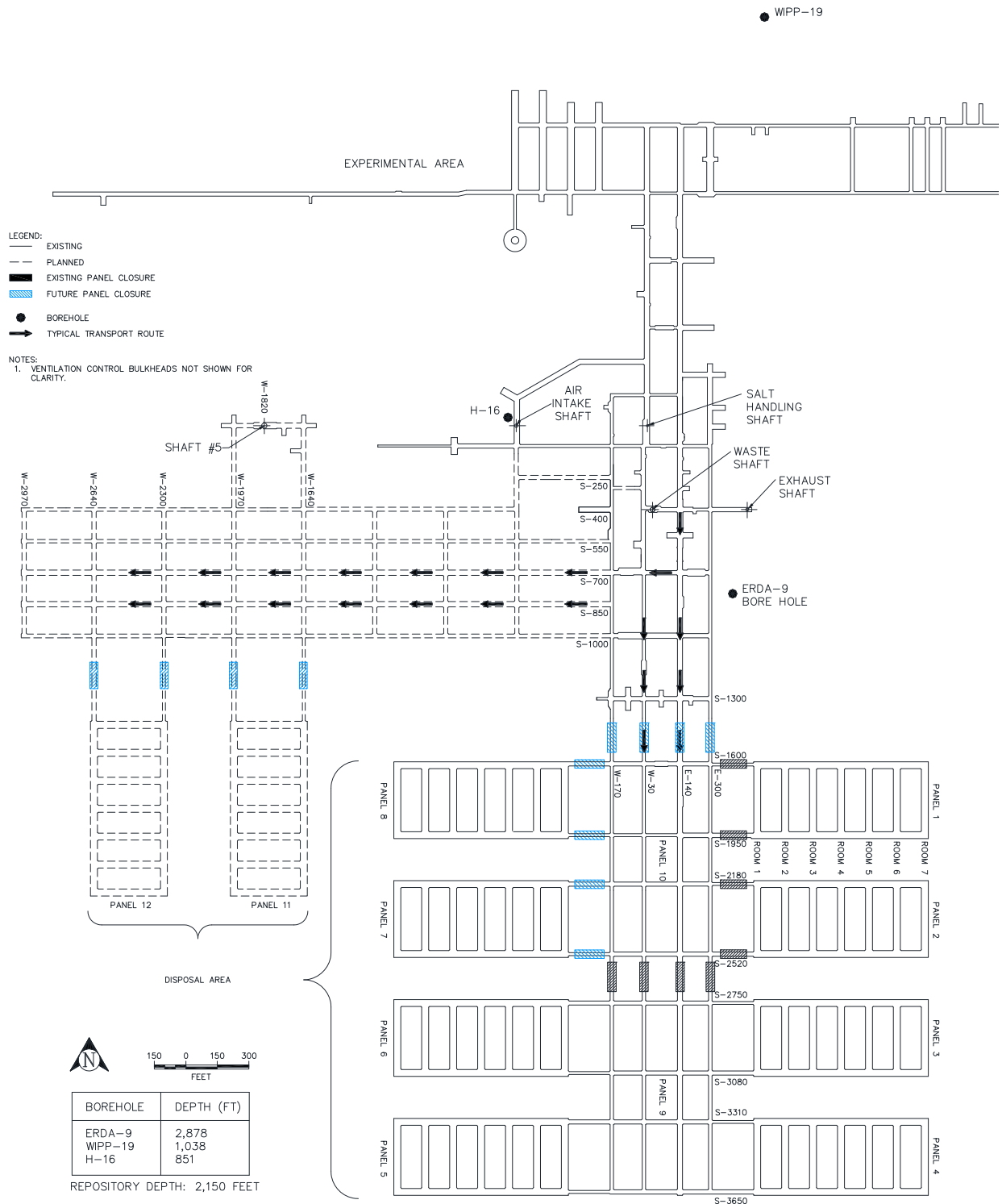
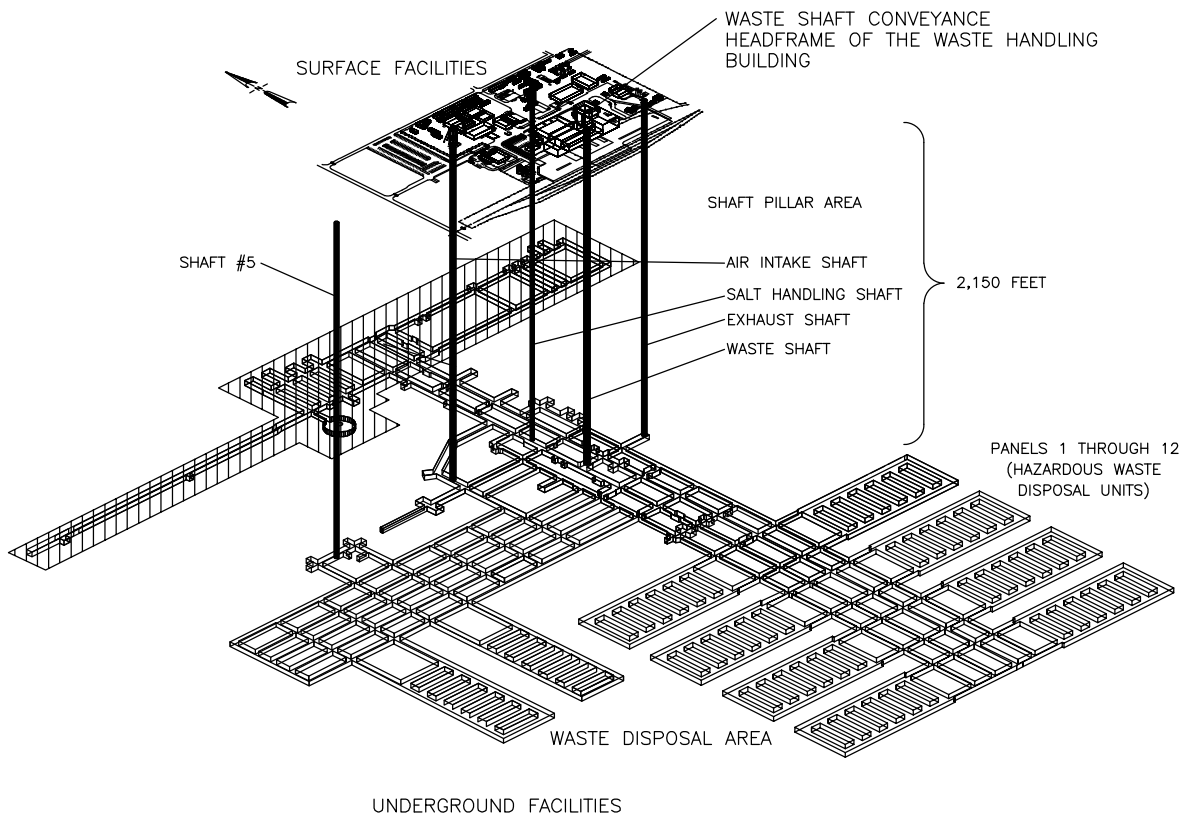


Figure M-42  
 Typical Disposal Panel

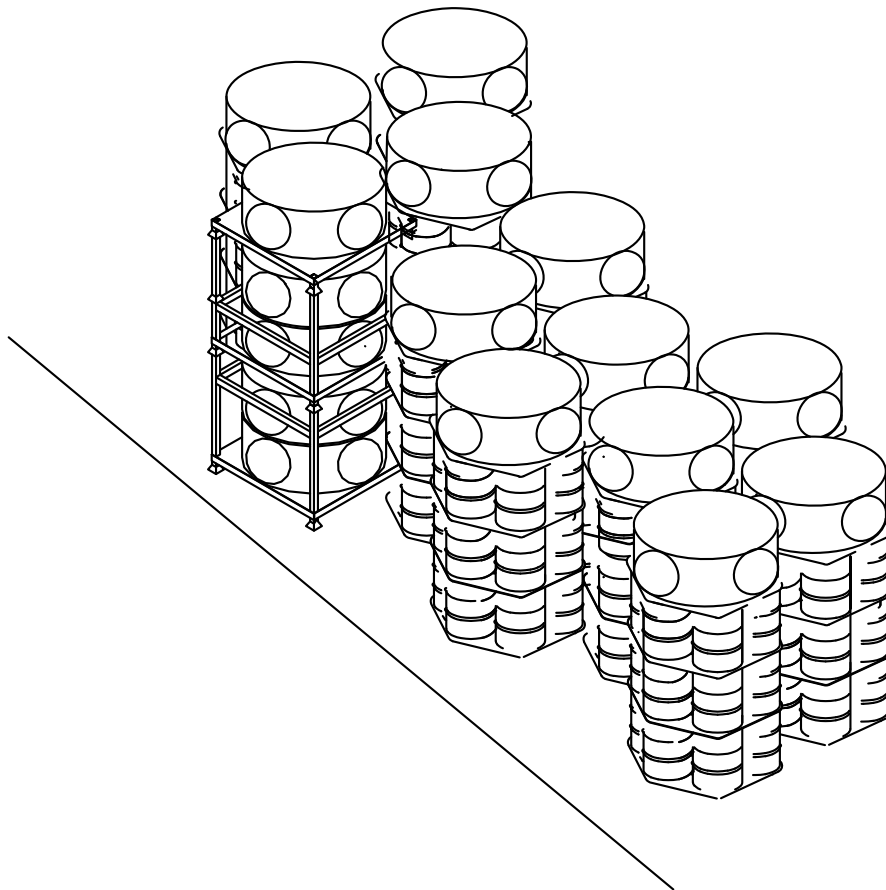
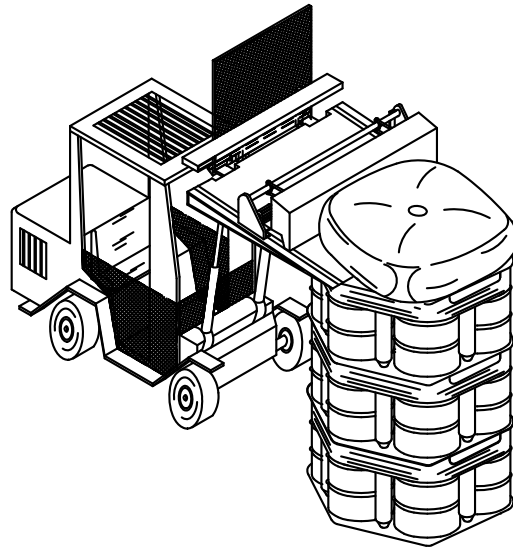
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**Figure M-43**  
**Repository Horizon and Underground Waste Transport Routes**

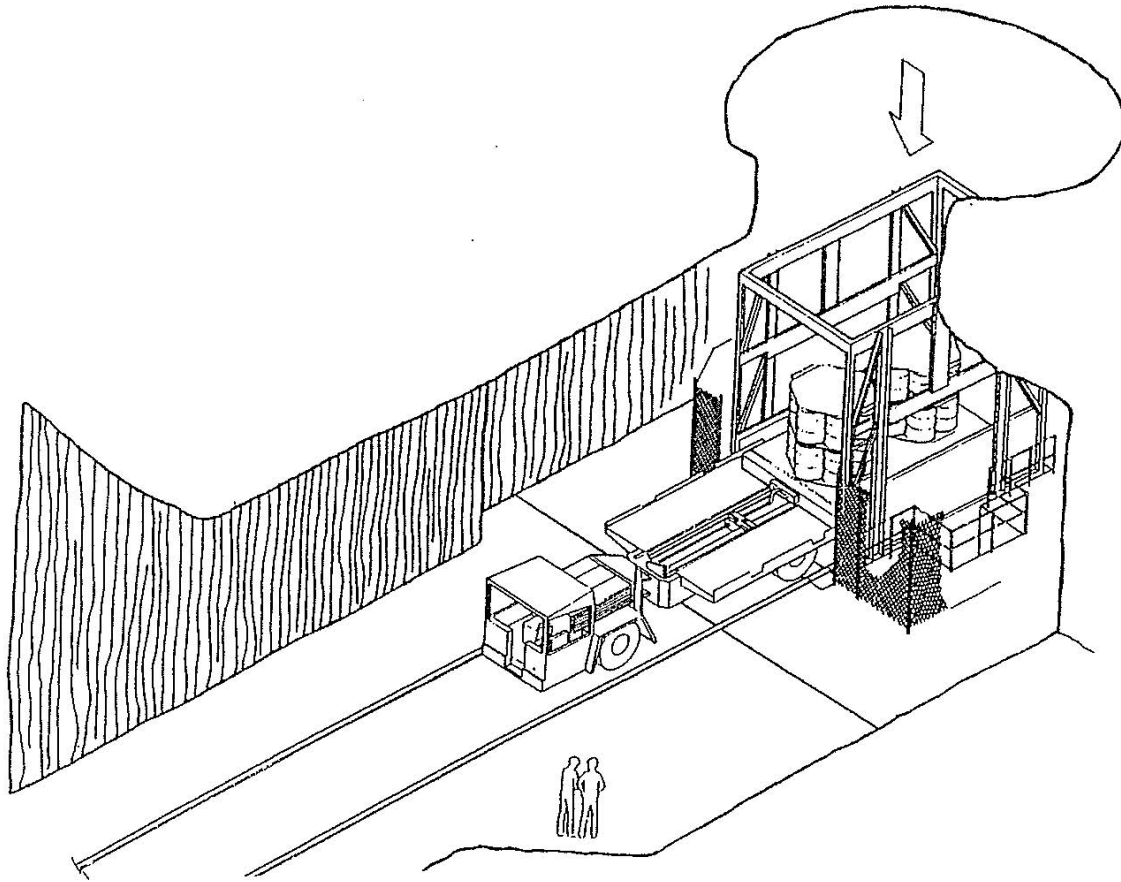


**Figure M-44**  
**Spatial View of the Miscellaneous Unit and Waste Handling Facility**

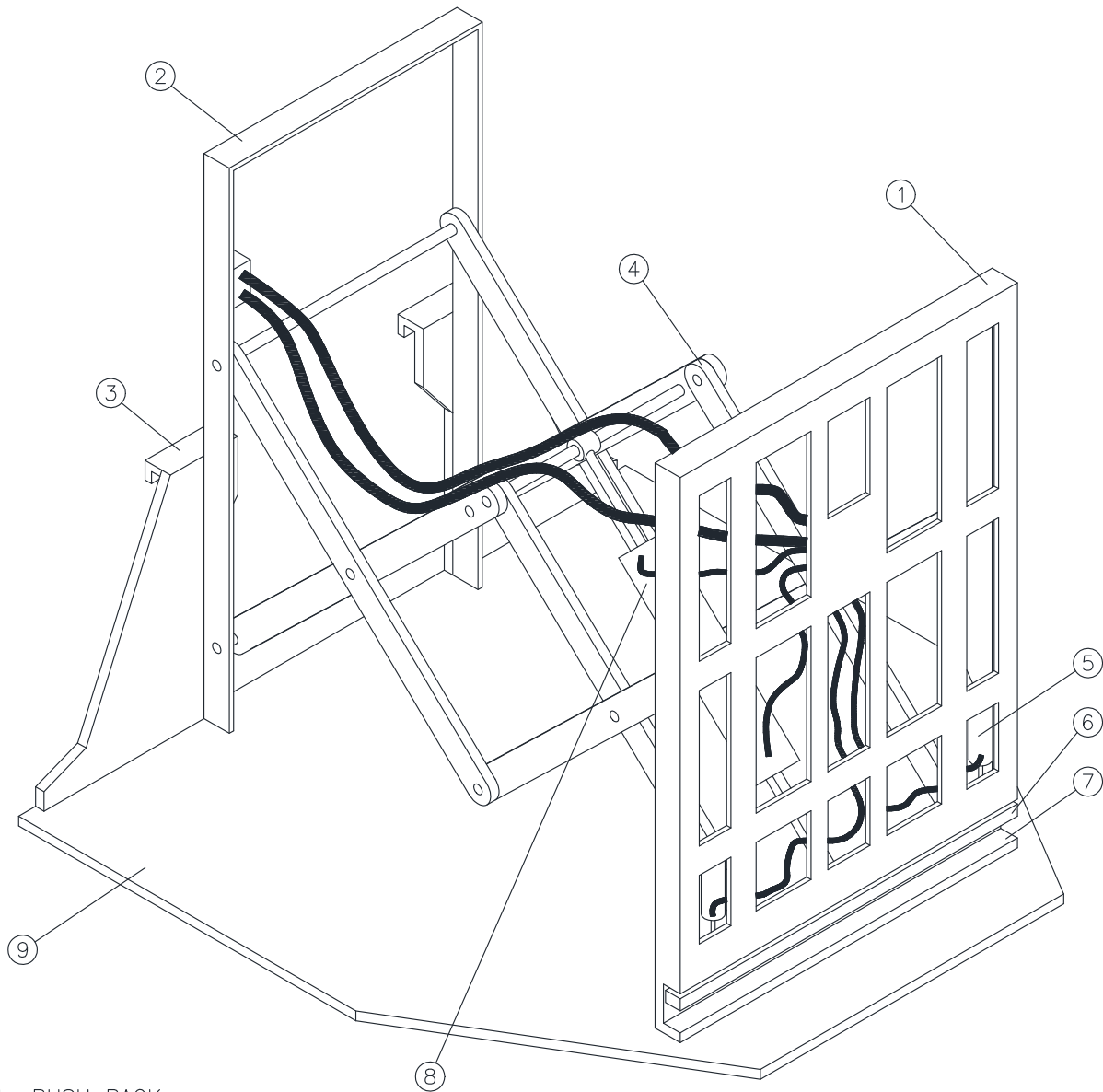


**Figure M-45**  
**Typical MgO Backfill Sacks Emplaced on Drum Stacks and Emplacement Configurations**



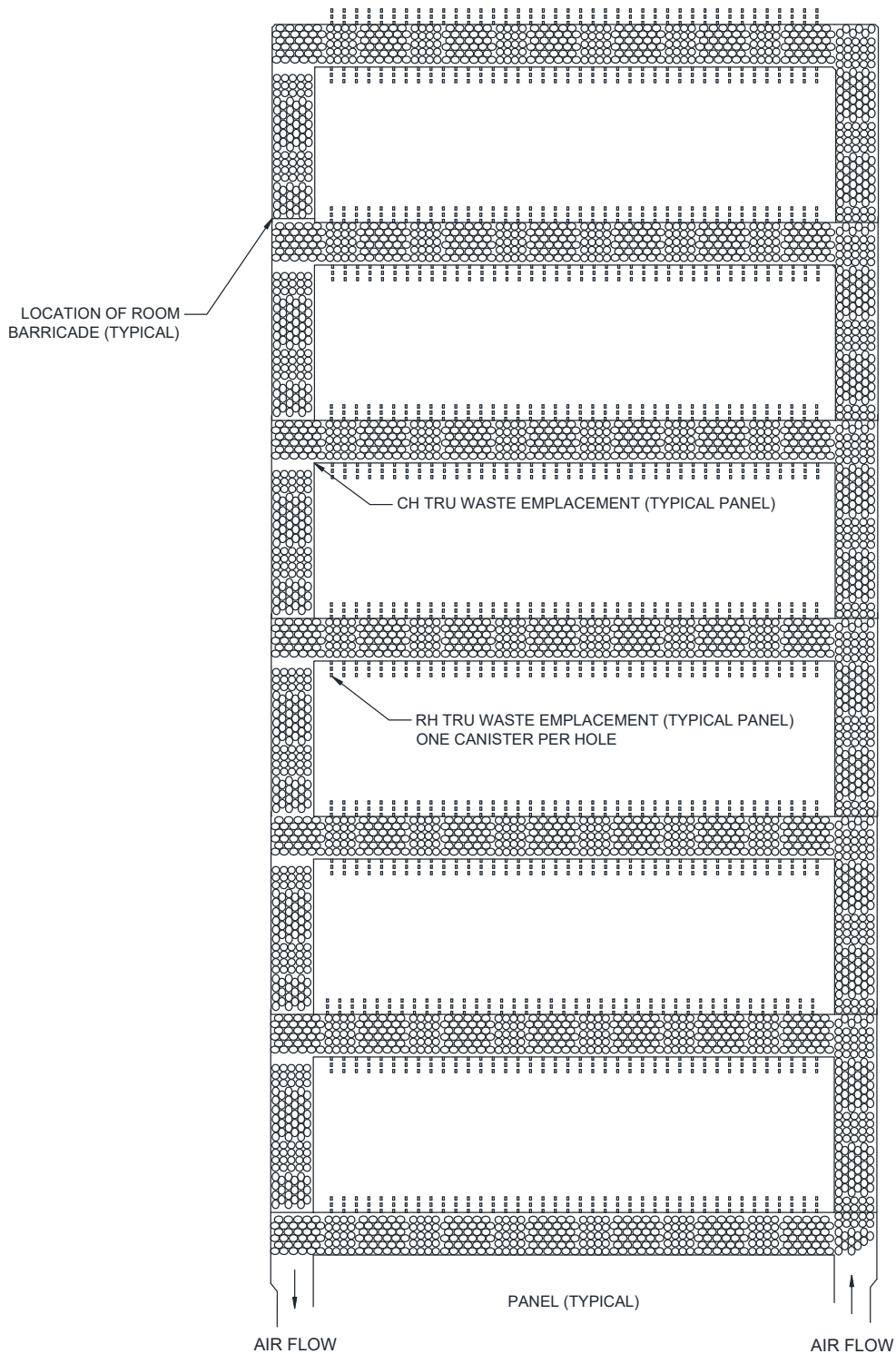


**Figure M-46**  
**Waste Transfer Cage to Transporter**



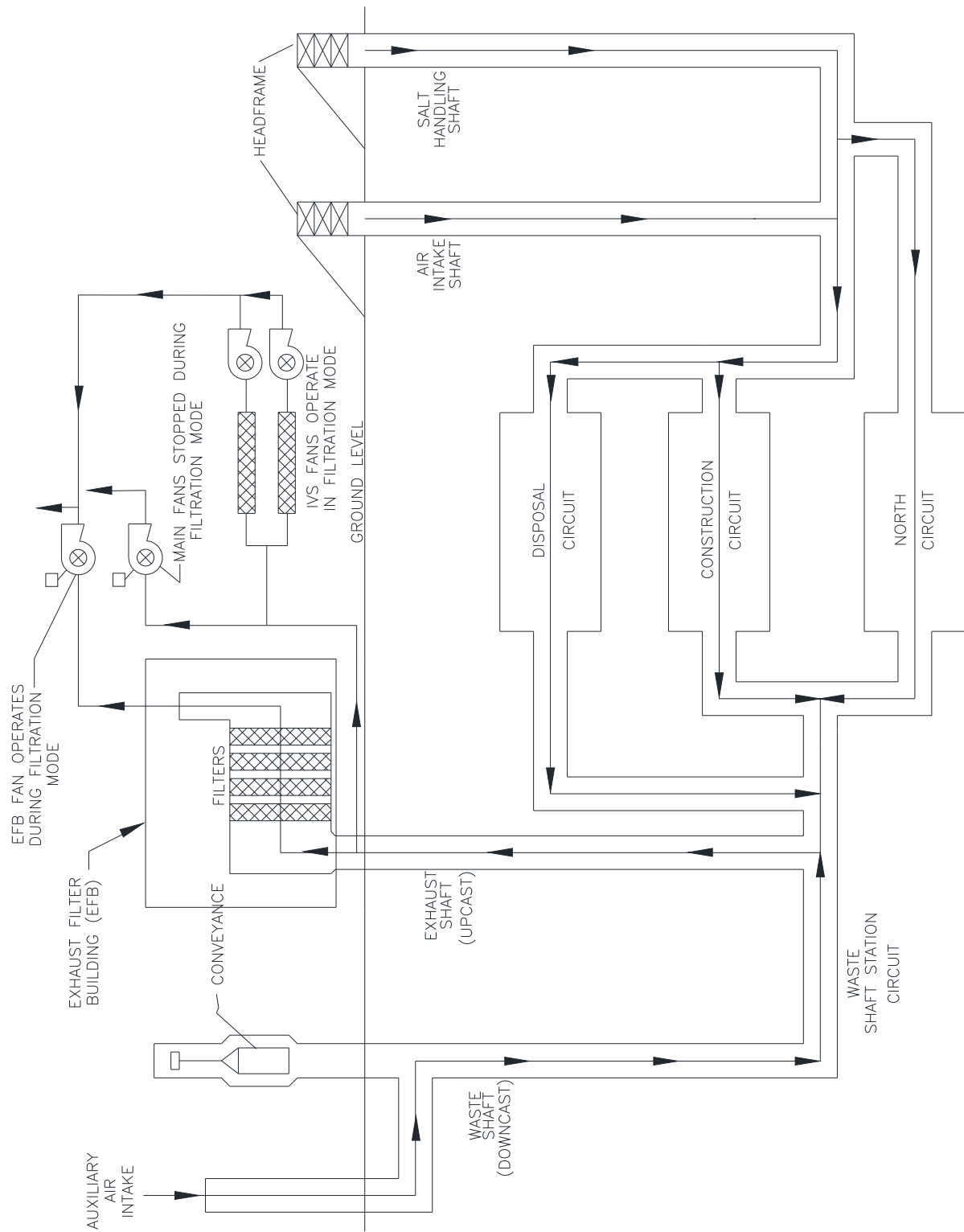
1. PUSH RACK
2. BASE ASSEMBLY
3. UPPER RETAINER
4. LINKAGE ASSEMBLY
5. GRIPPER CYLINDER
6. GRIPPER BAR
7. GRIPPER JAW
8. PUSH CYLINDER
9. PLATFN

**Figure M-47**  
**Push-Pull Attachment to Forklift to Allow Handling of Waste Containers**

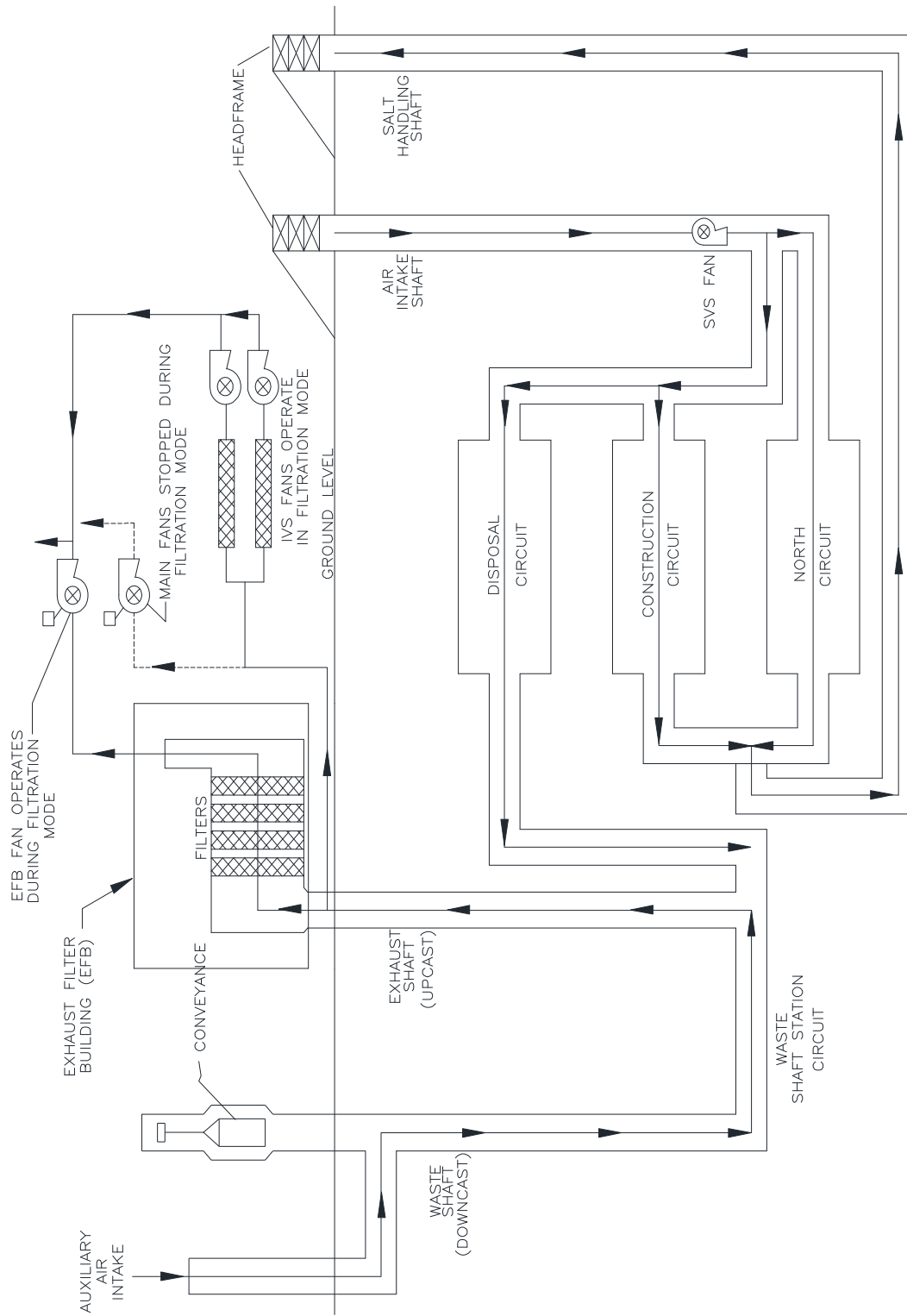


NOTE: MgO will be emplaced as necessary

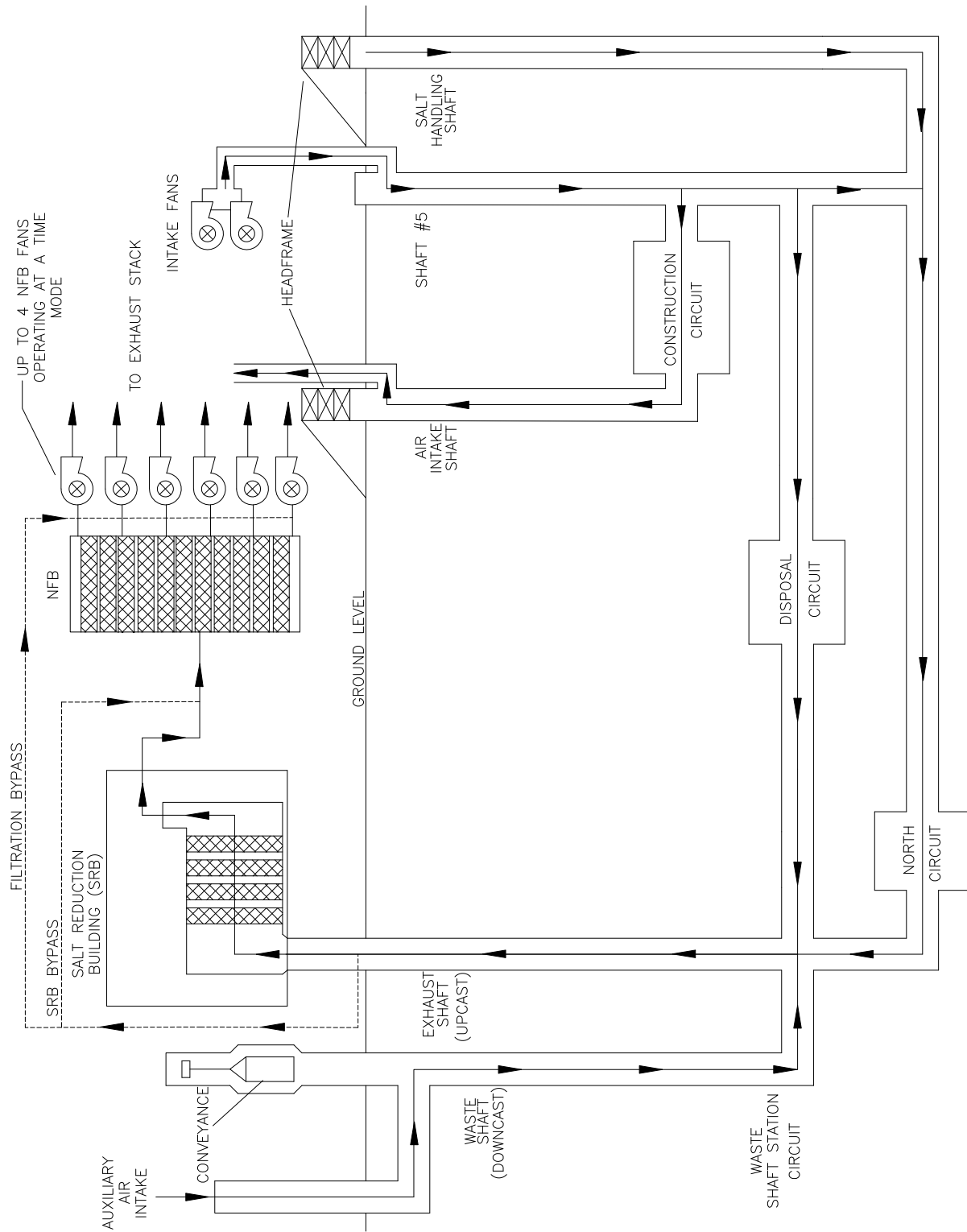
**Figure M-48**  
**Typical RH and CH TRU Mixed Waste Container Disposal Configuration**



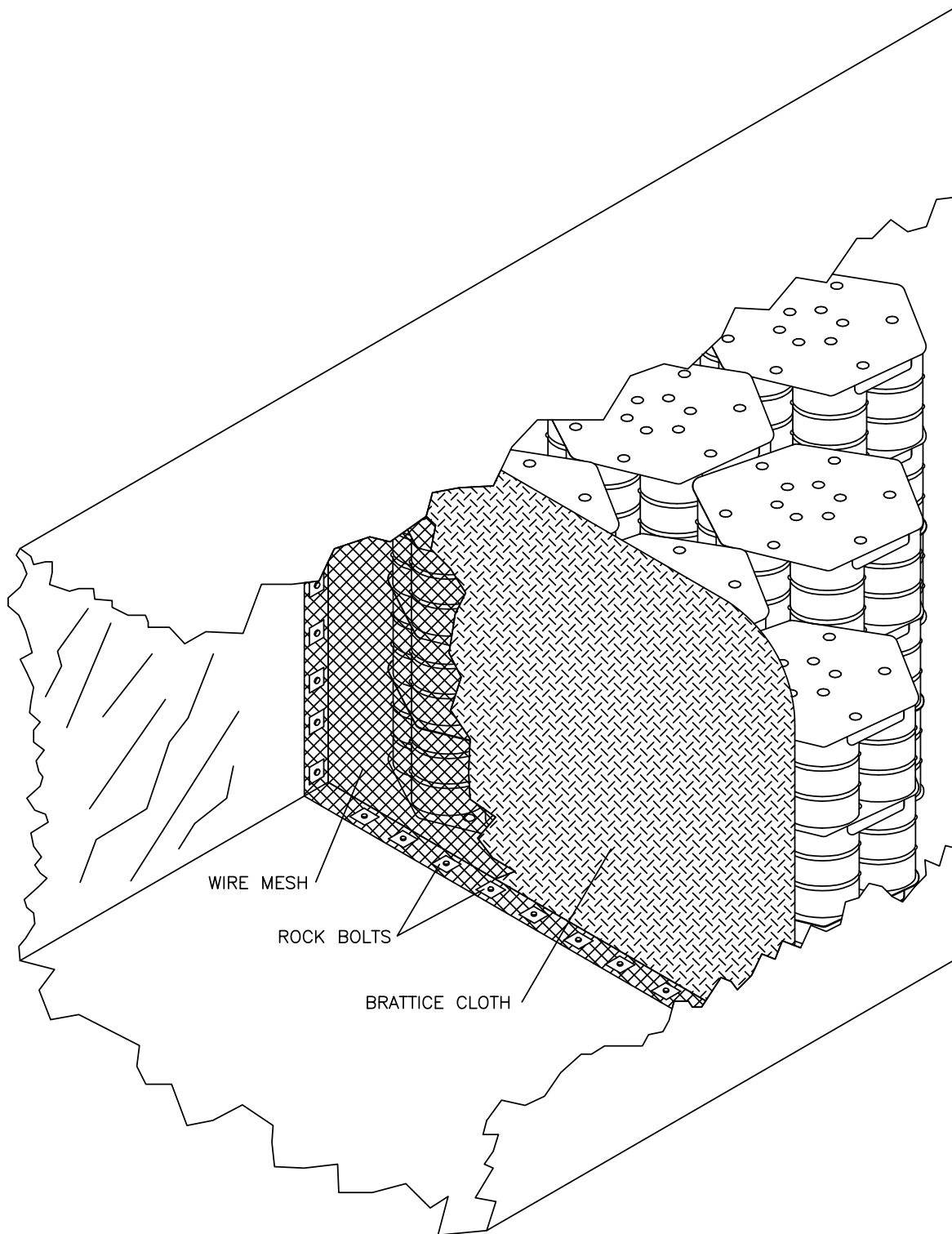
**Figure M-49**  
**Underground Ventilation System Airflow**



**Figure M-50**  
**Underground Ventilation System Airflow (with SVS)**

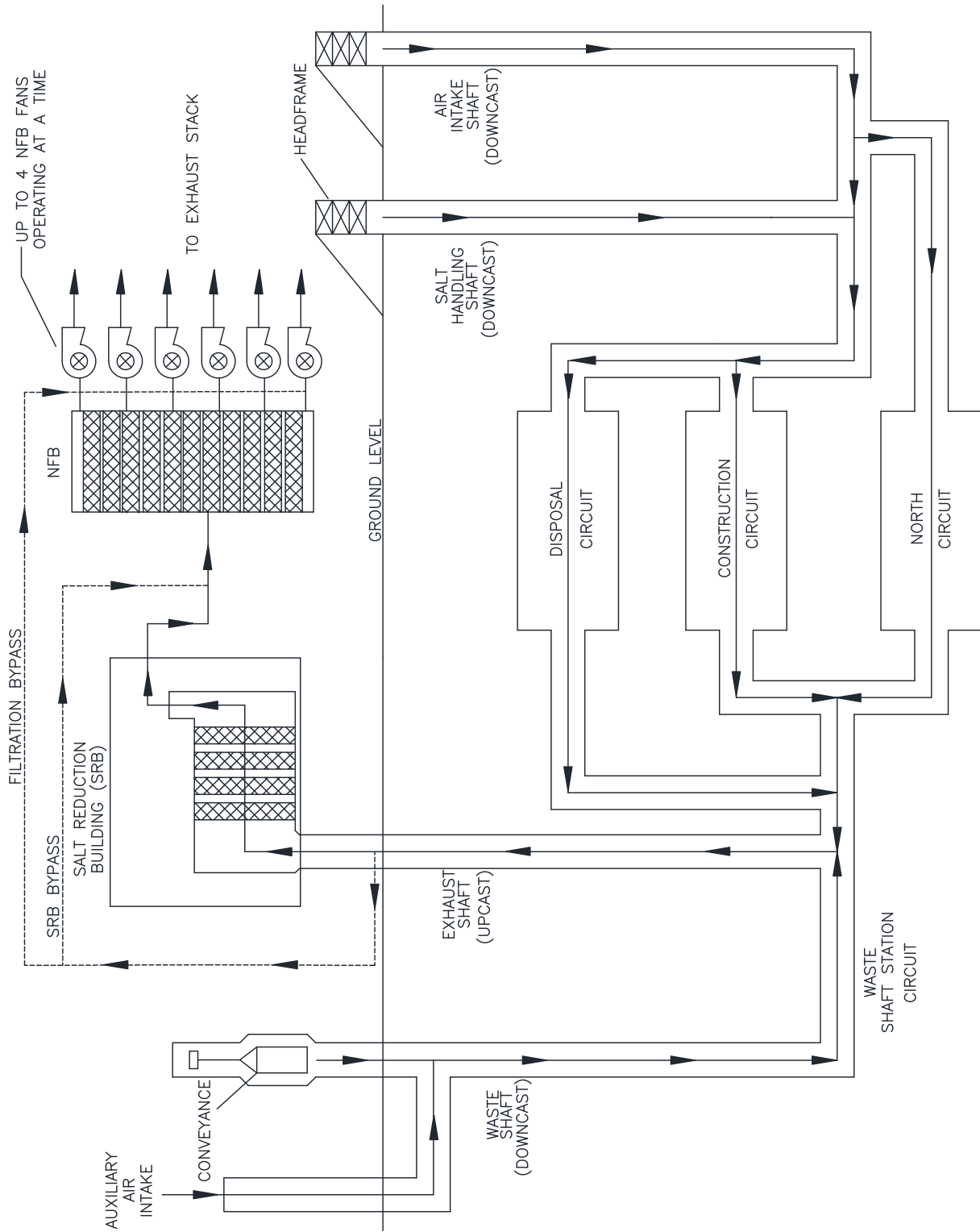


**Figure M-51**  
**Underground Ventilation System Airflow (with S#5)**

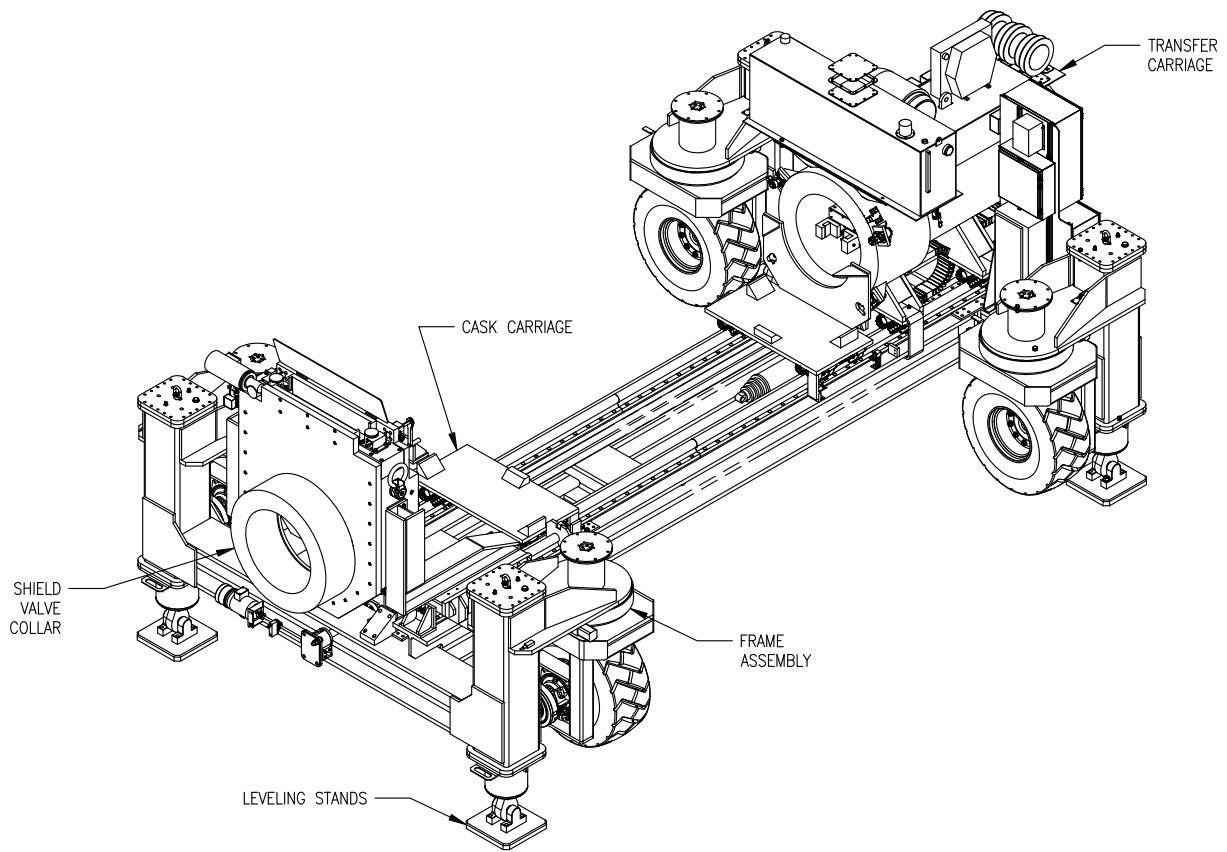


**Figure M-52**  
**Typical Room Barricade**

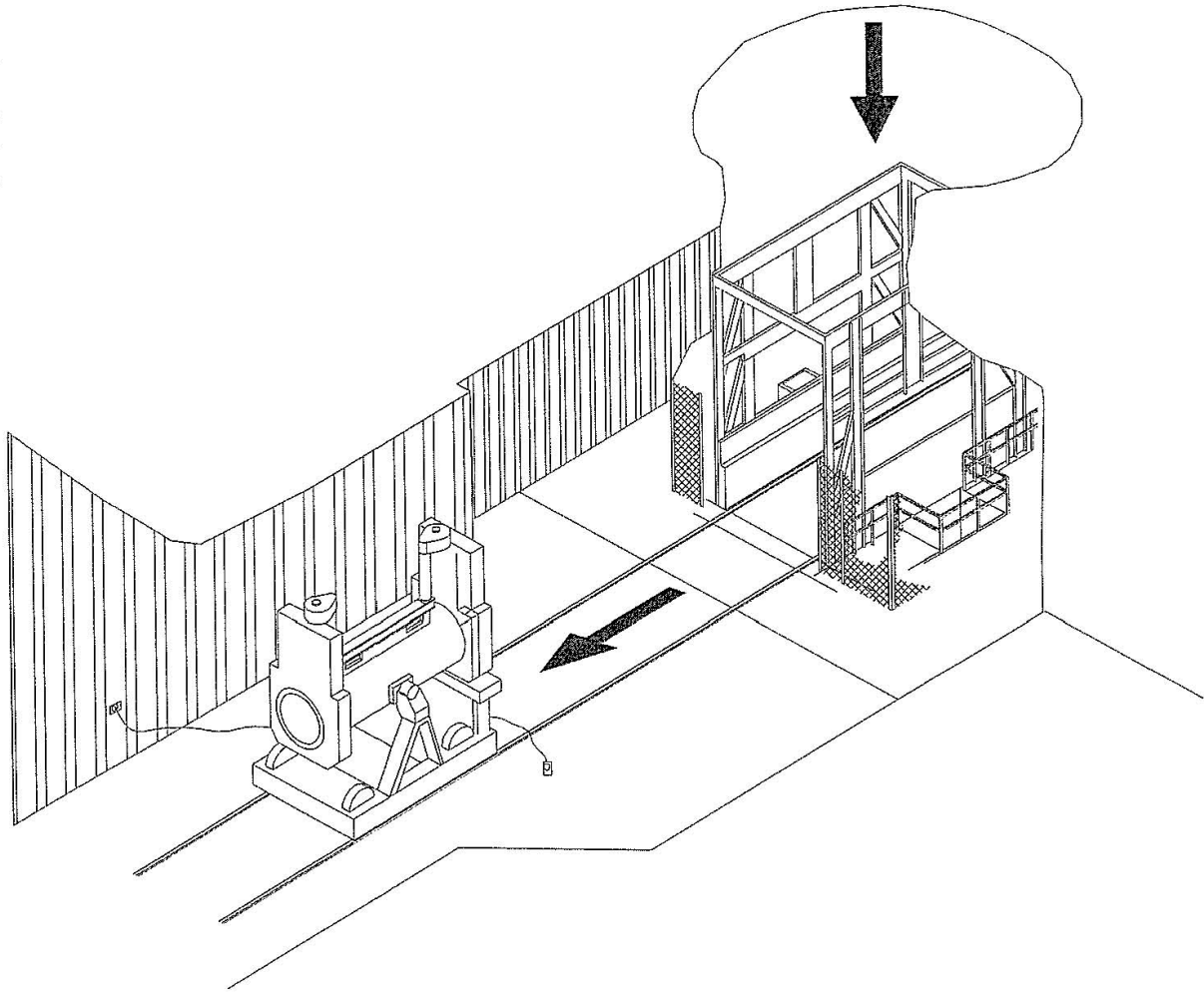




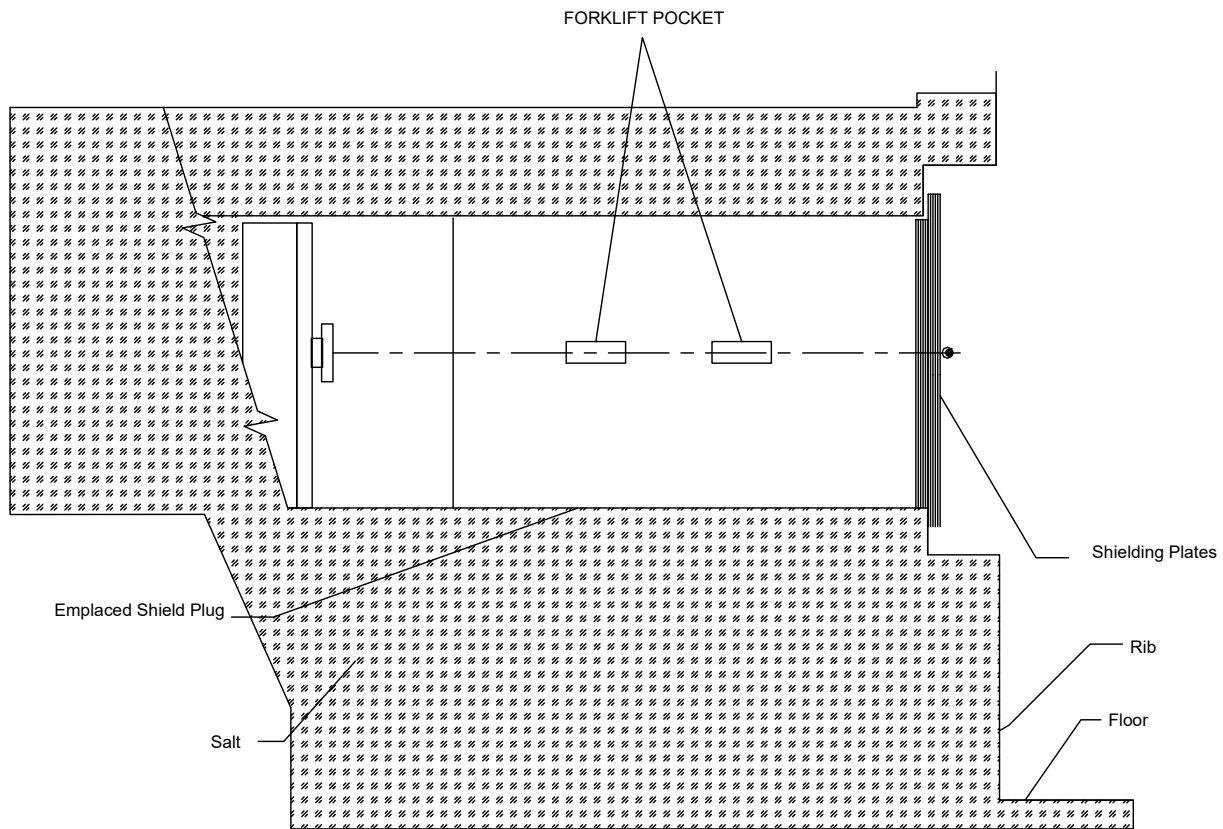
**Figure M-53**  
**Underground Ventilation System Airflow (with Building 416)**



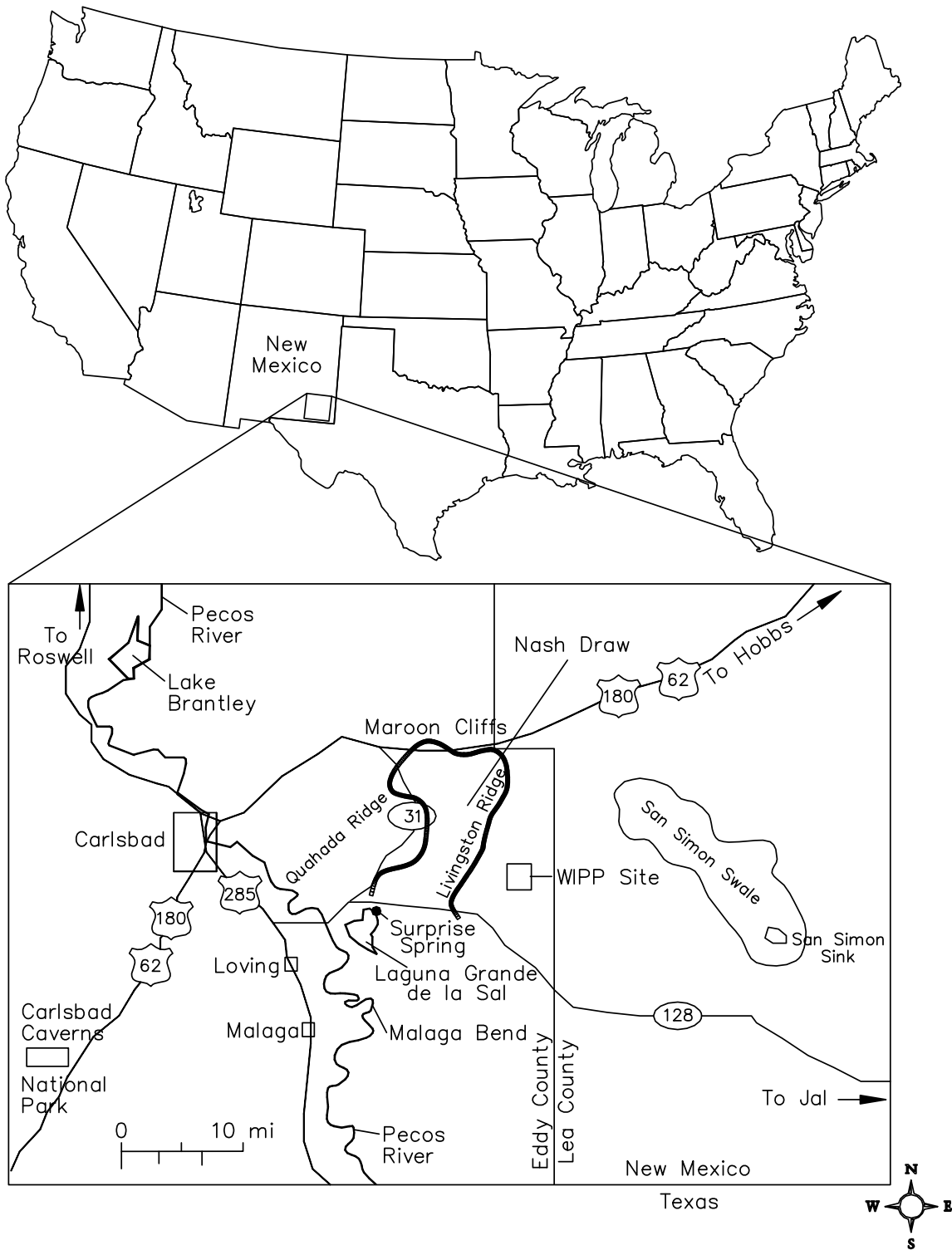
**Figure M-54**  
**Typical RH Emplacement Equipment**



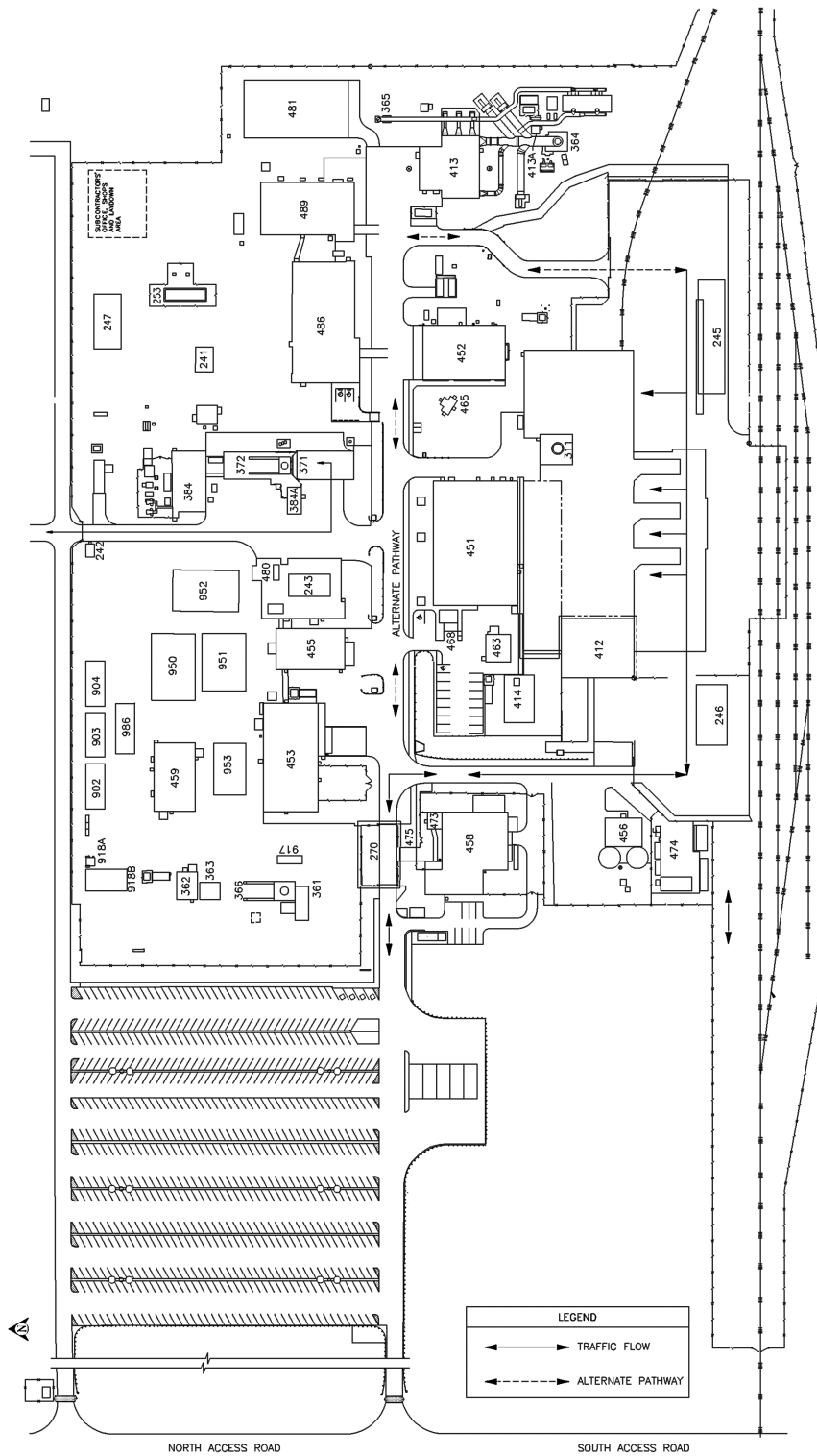
**Figure M-55**  
**RH TRU Waste Facility Cask Unloading from Waste Shaft Conveyance**



**Figure M-56**  
**Section of Borehole Showing the RH Shield Plug and Supplemental Shielding Plate(s)**



**Figure M-57**  
**General Location of the WIPP Facility**

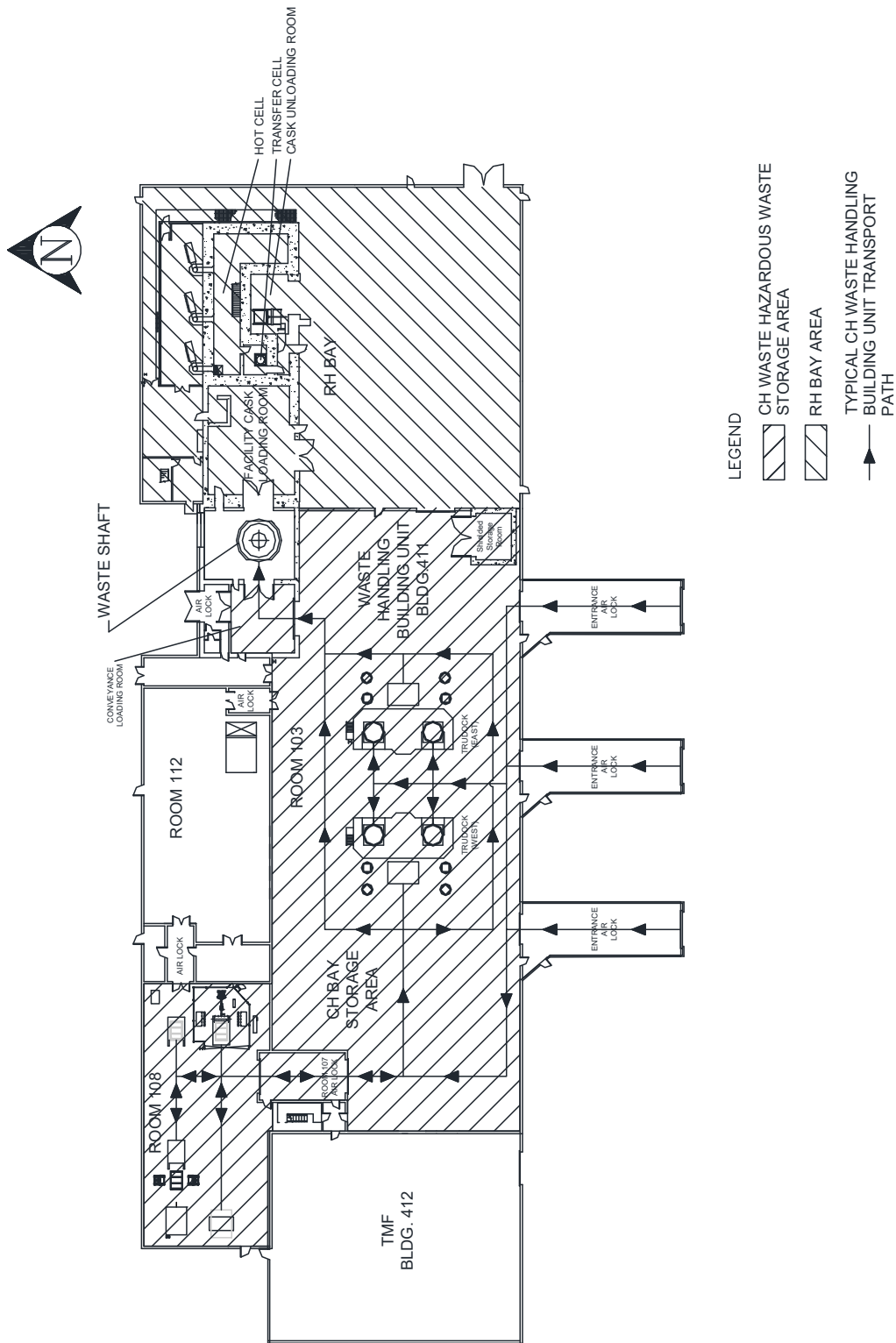


(see Figure D-1 for legend of the surface buildings)

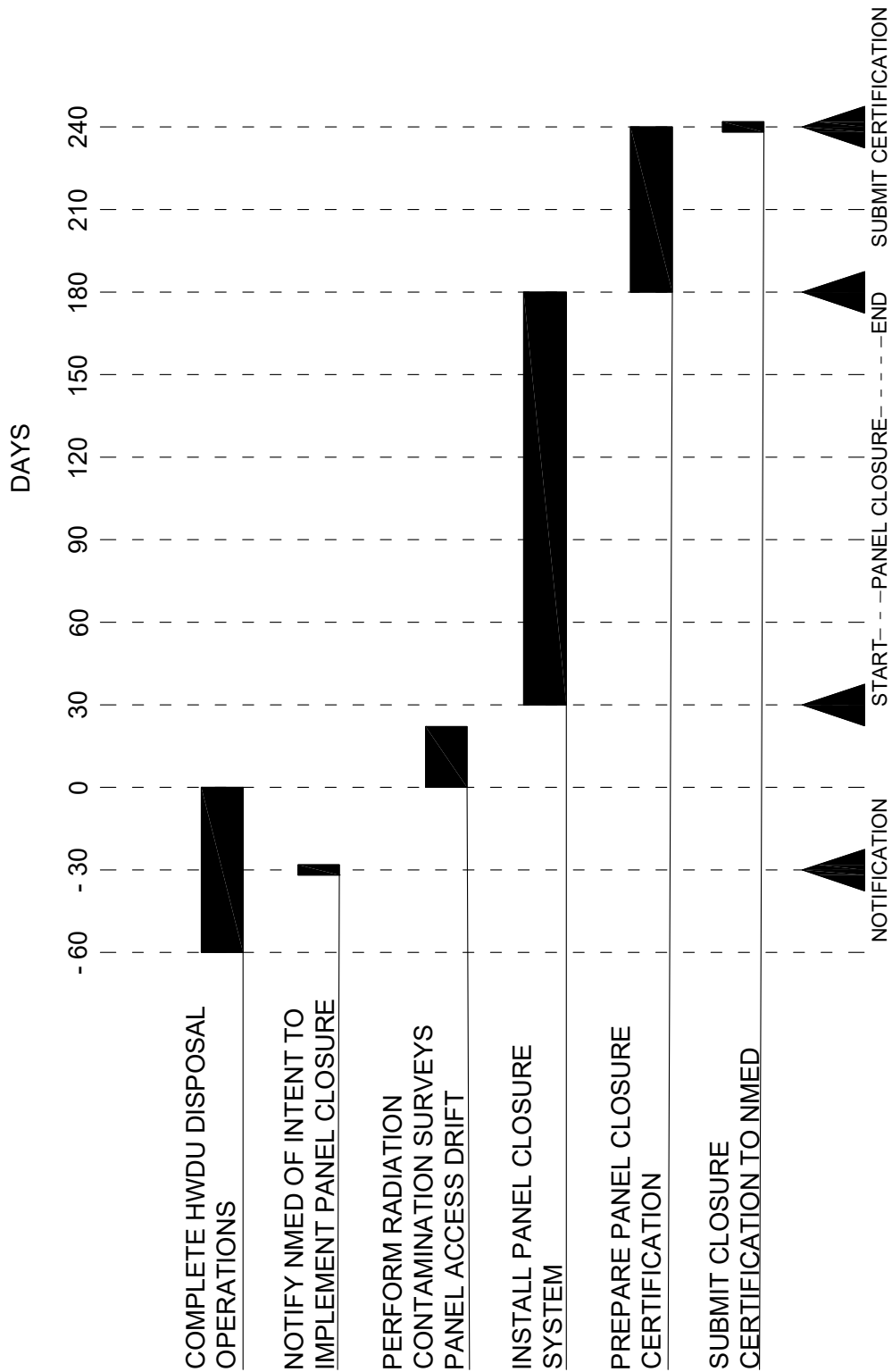
**Figure M-58**  
**WIPP Traffic Flow Diagram**



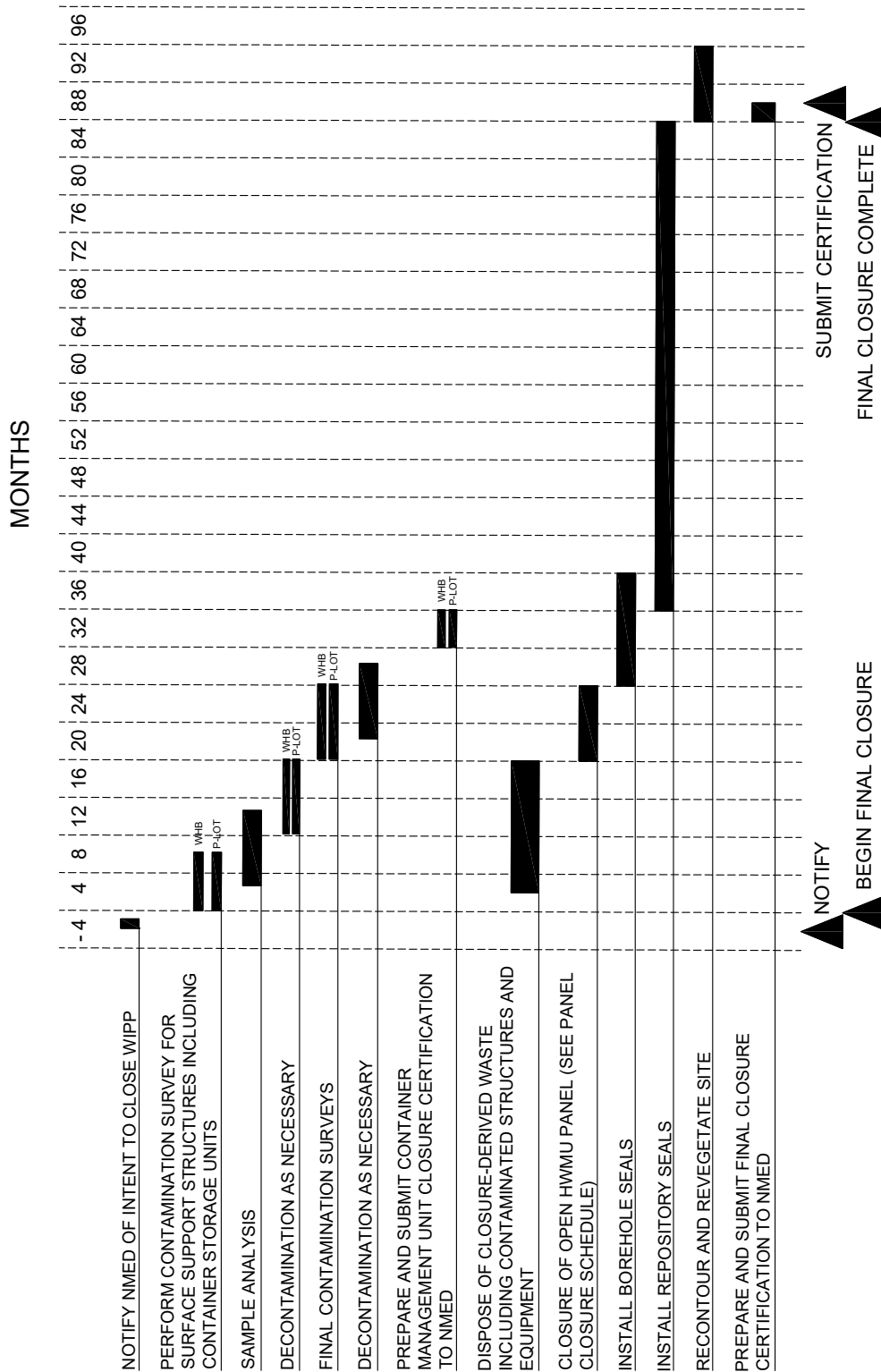




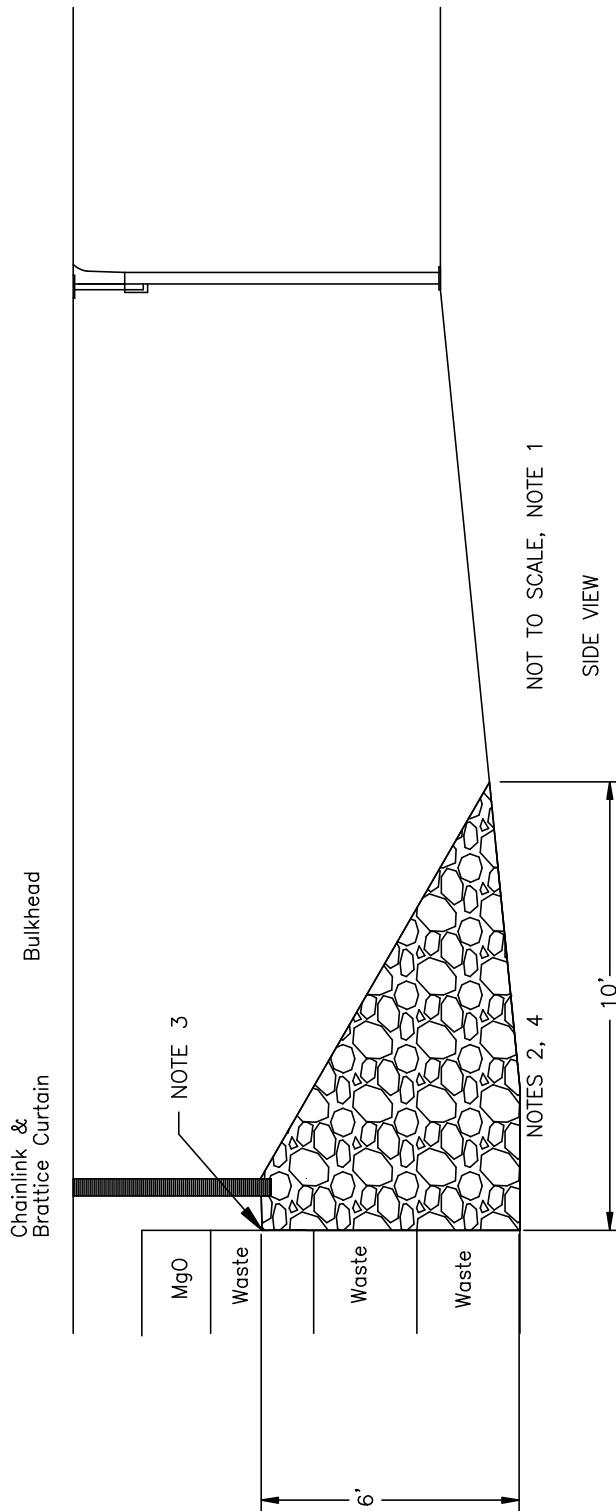
**Figure M-60**  
**Typical CH Mixed Waste Transport Routes in Waste Handling Building - Container Storage Unit**



**Figure M-61**  
**WIPP Panel Closure Schedule**



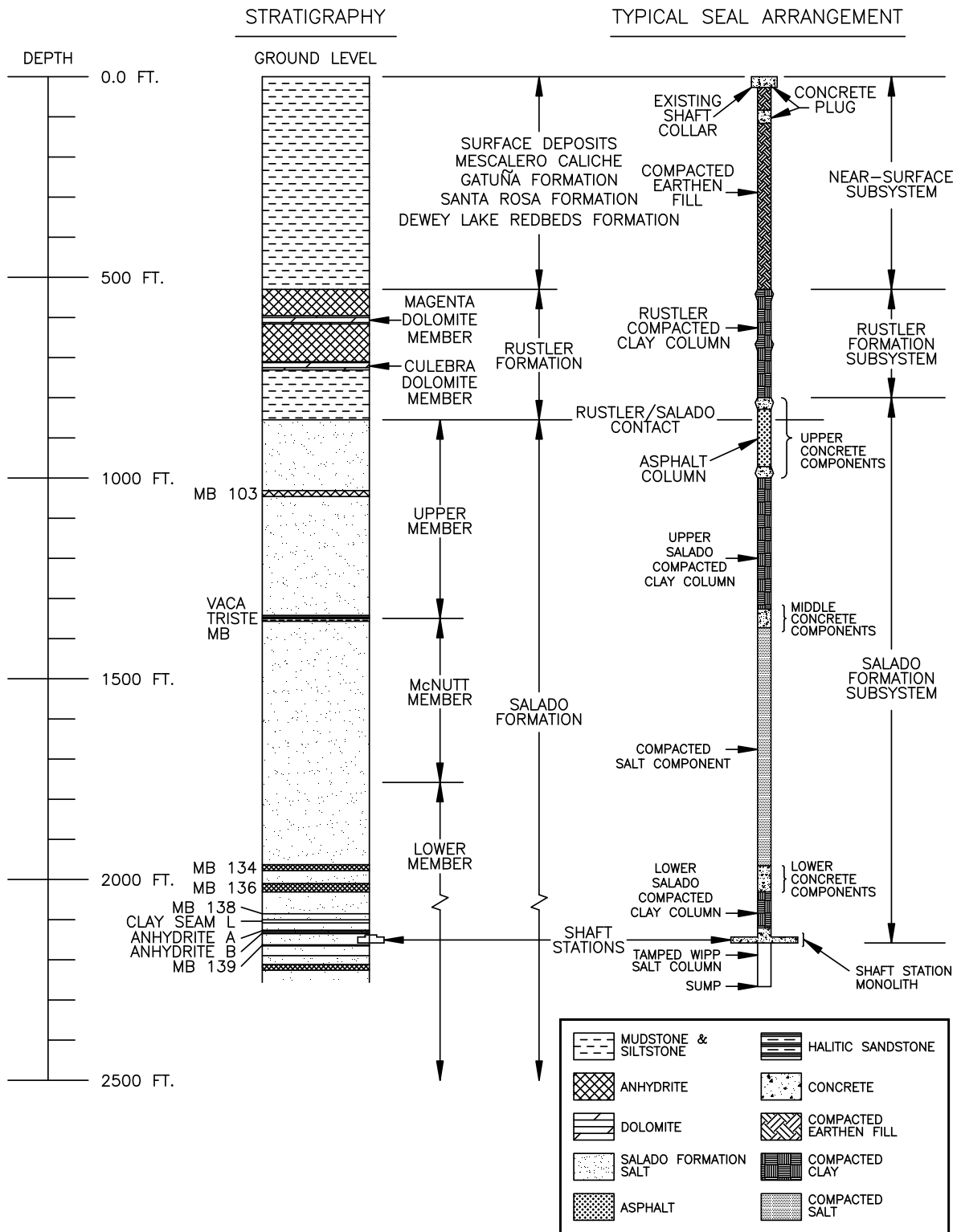
**Figure M-62**  
**WIPP Facility Final Closure 84-Month Schedule**



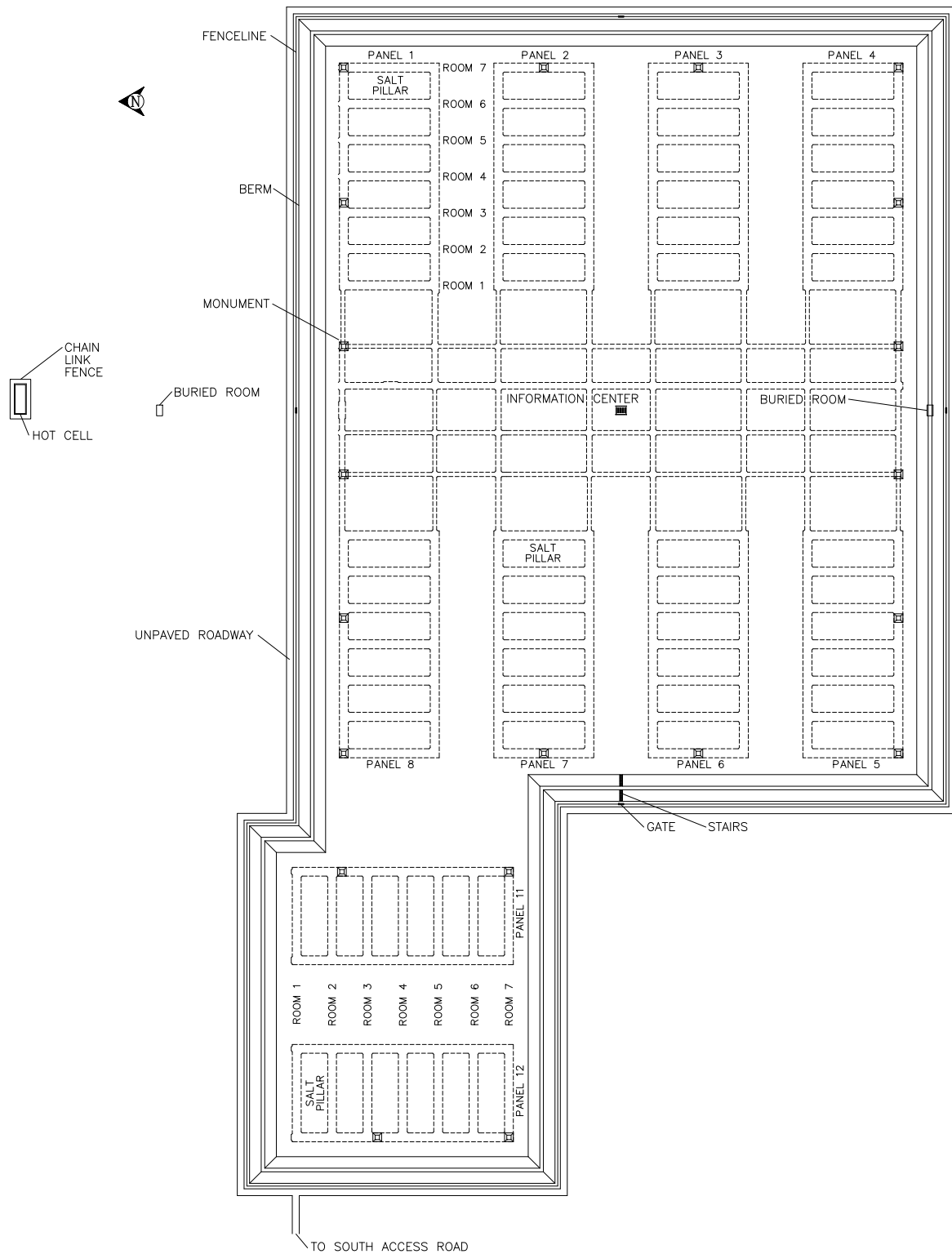
NOTES

1. CONFIGURATION AND PLACEMENT OF THE SUBSTANTIAL BARRIER AND THE BULKHEAD DICTATED BY AS-FOUND (FIELD) CONDITIONS, AS DESIGNATED BY THE COGNIZANT ENGINEER.
2. SUBSTANTIAL BARRIER MATERIAL WILL CONSIST OF RUN-OF-MINE SALT OR OTHER SUITABLE NON-FLAMMABLE MATERIAL AS DESIGNATED BY THE COGNIZANT ENGINEER.
3. SUBSTANTIAL BARRIER MATERIAL SHOULD BE AGAINST THE WASTE FACE. THE HEIGHT OF THE SUBSTANTIAL BARRIER NEAR THE WASTE WILL BE AT LEAST EQUAL TO THE HEIGHT OF THE BOTTOM OF THE TOP ROW OF WASTE.
4. DIMENSIONS INDICATED ARE MINIMUMS. THE HEIGHT OF THE SUBSTANTIAL BARRIER IS MEASURED AT THE WASTE FACE. THE LENGTH OF THE SUBSTANTIAL BARRIER IS MEASURED FROM THE BOTTOM OF THE WASTE FACE TO THE TOE OF THE SUBSTANTIAL BARRIER MATERIAL.

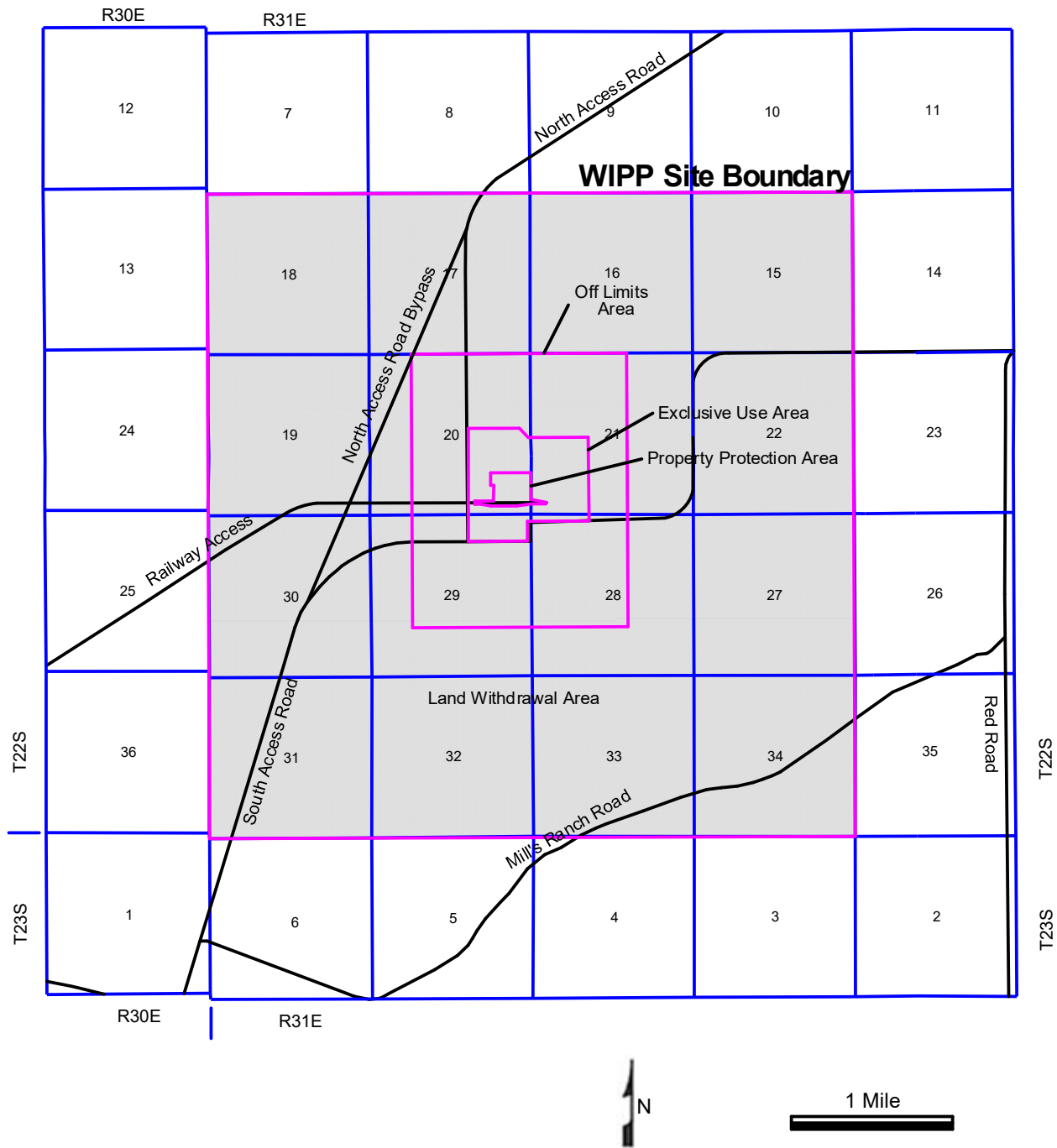
**Figure M-63**  
**Typical Substantial Barrier and Bulkhead**



**Figure M-64**  
**Typical Shaft Sealing System**



**Figure M-65**  
**Perimeter Fenceline and Roadway**



**Figure M-66**  
**WIPP Facility Boundaries Showing 16-square-Mile Land Withdrawal Boundary**

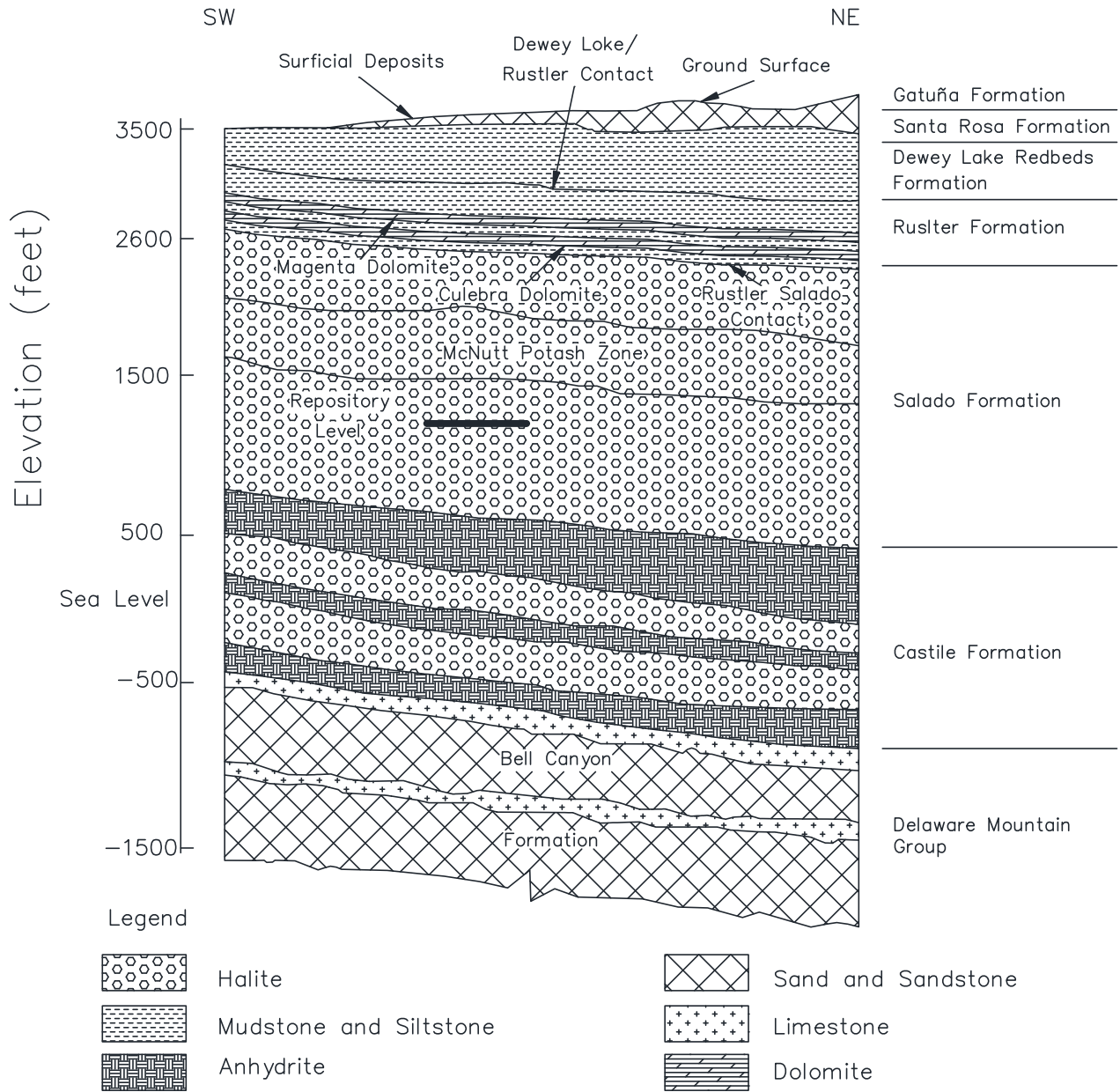


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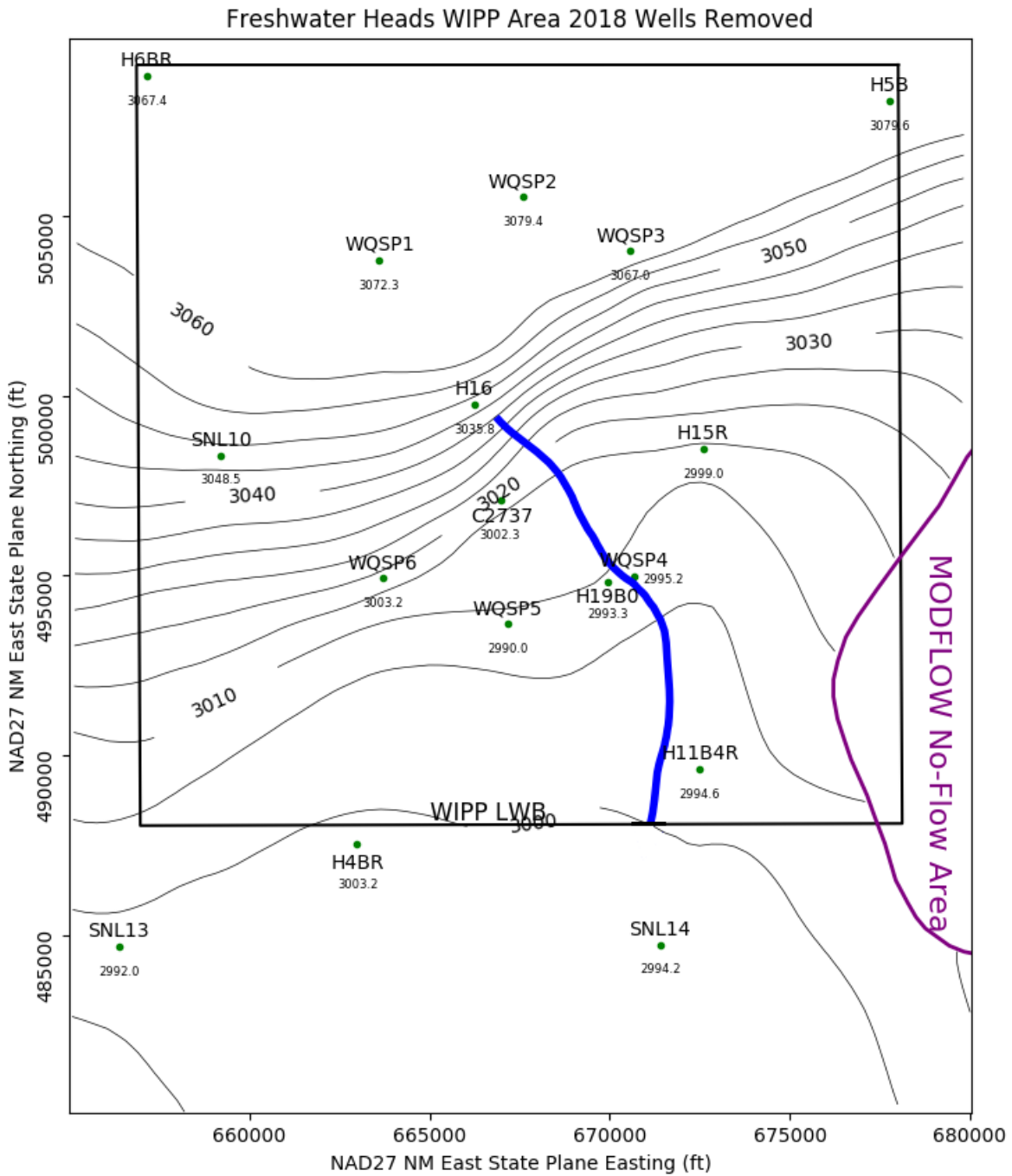
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SYSTEM	SERIES	GROUP	FORMATION	MEMBER
RECENT	RECENT		SURFICIAL DEPOSITS	
QUATERNARY	PLEISTOCENE		MESCALERO CALICHE	
			GATUÑA	
TERTIARY	MID-PLIOCENE		OGALLALA	
TRIASSIC		DOCKUM	SANTA ROSA	
PERMIAN	OCHOAN		DEWEY LAKE REDBEDS	
			RUSTLER	FORTY-NINER
				MAGENTA DOLOMITE
				TAMARISK
				CULEBRA DOLOMITE
				LOS MEDAÑOS
			SALADO	UPPER
	MCNUTT POTASH			
	LOWER			
	CASTILE			
	GUADALUPIAN	DELAWARE MOUNTAIN	BELL CANYON	
			CHERRY CANYON	
			BRUSHY CANYON	

**Figure M-67**  
**Site Geologic Column**

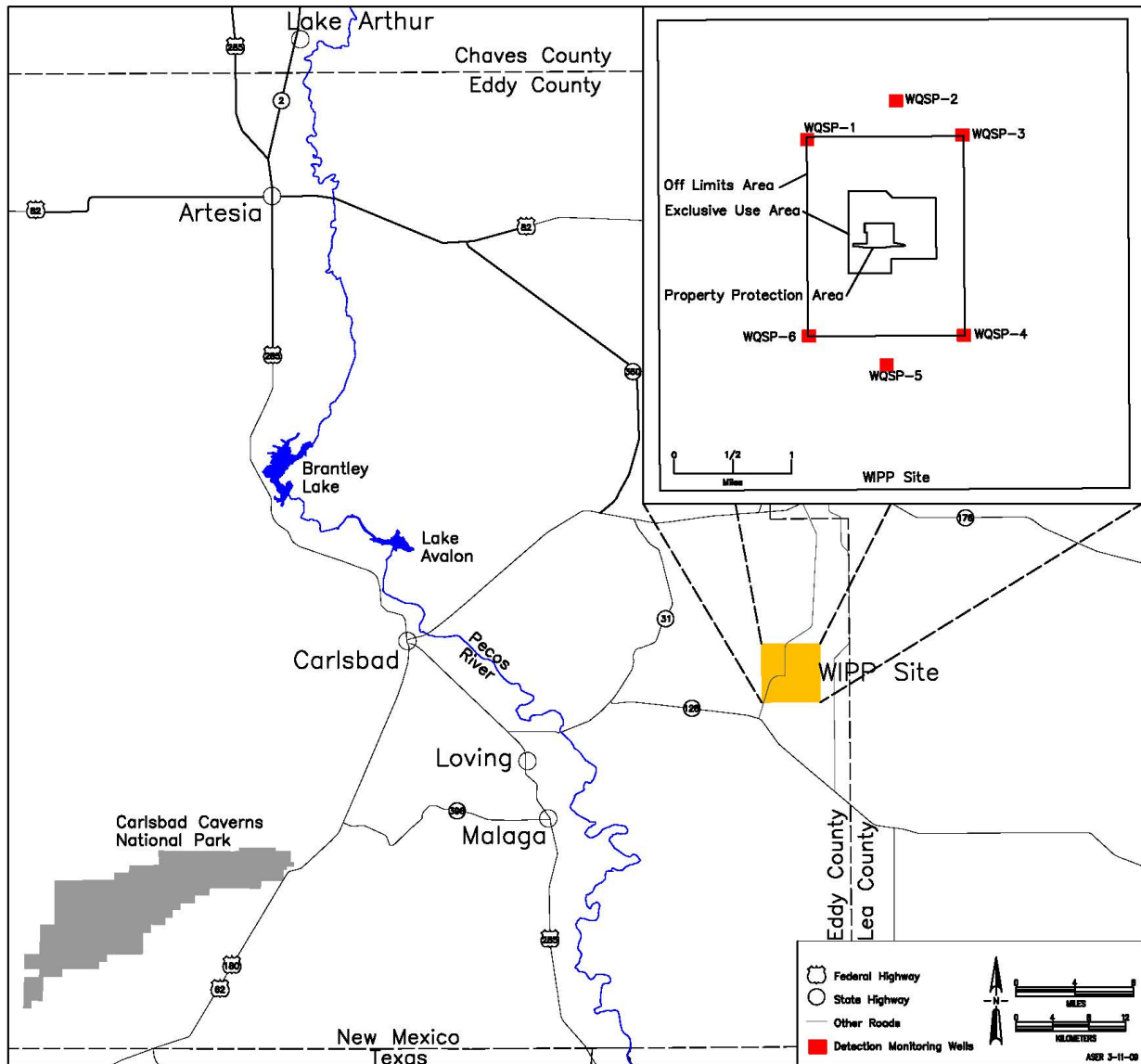


**Figure M-68**  
**Generalized Stratigraphic Cross Section above the Bell Canyon Formation at the WIPP Site**

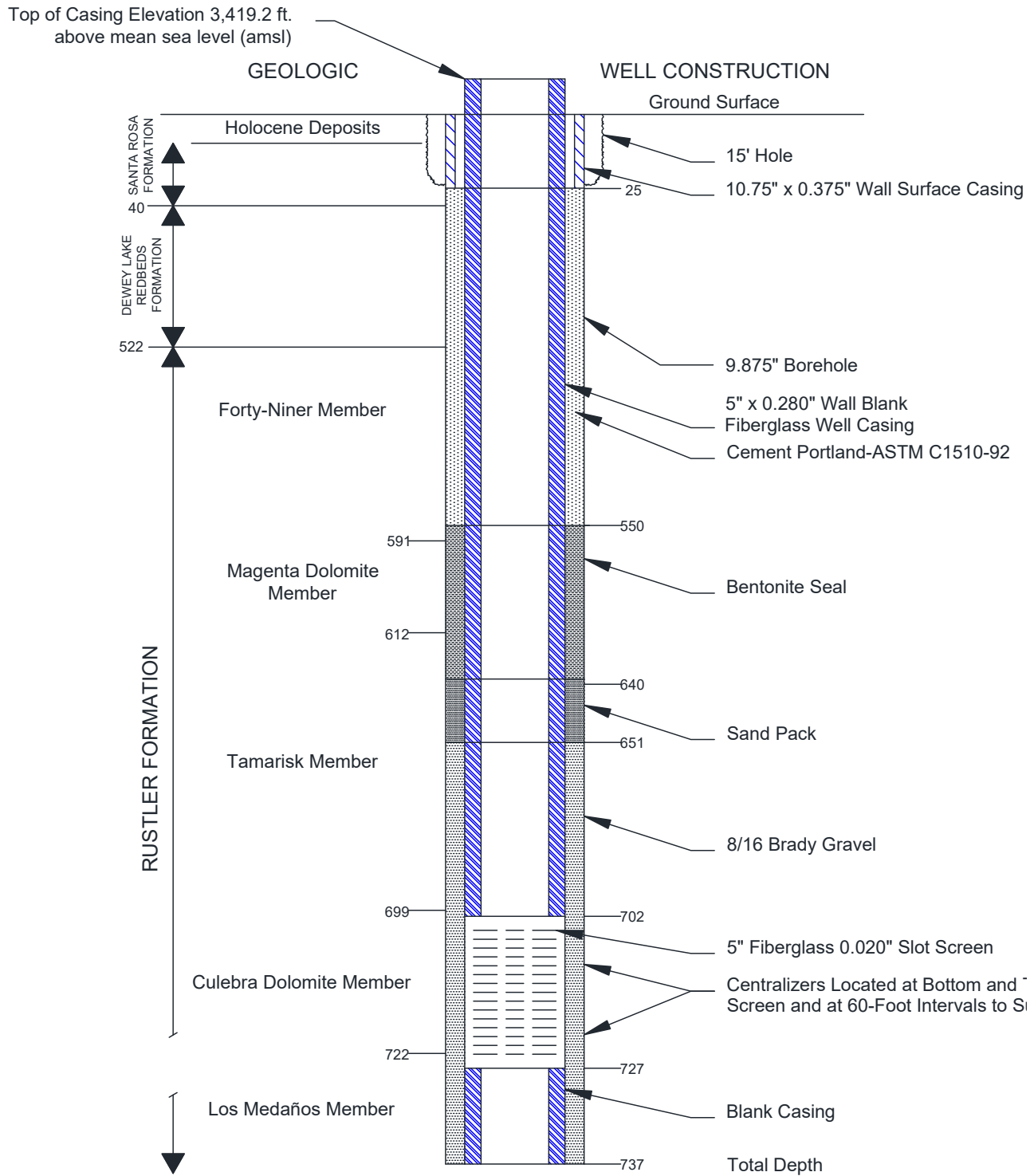


*Model generated September 2019 utilizing May 2018 freshwater head contours with observed heads (ft) listed at each well. Contours are at 5 ft intervals with the blue line particle track from the waste handling shaft to the WIPP Land Withdrawal Boundary. The purple line is a constant head boundary representing the Rustler halite margin.*

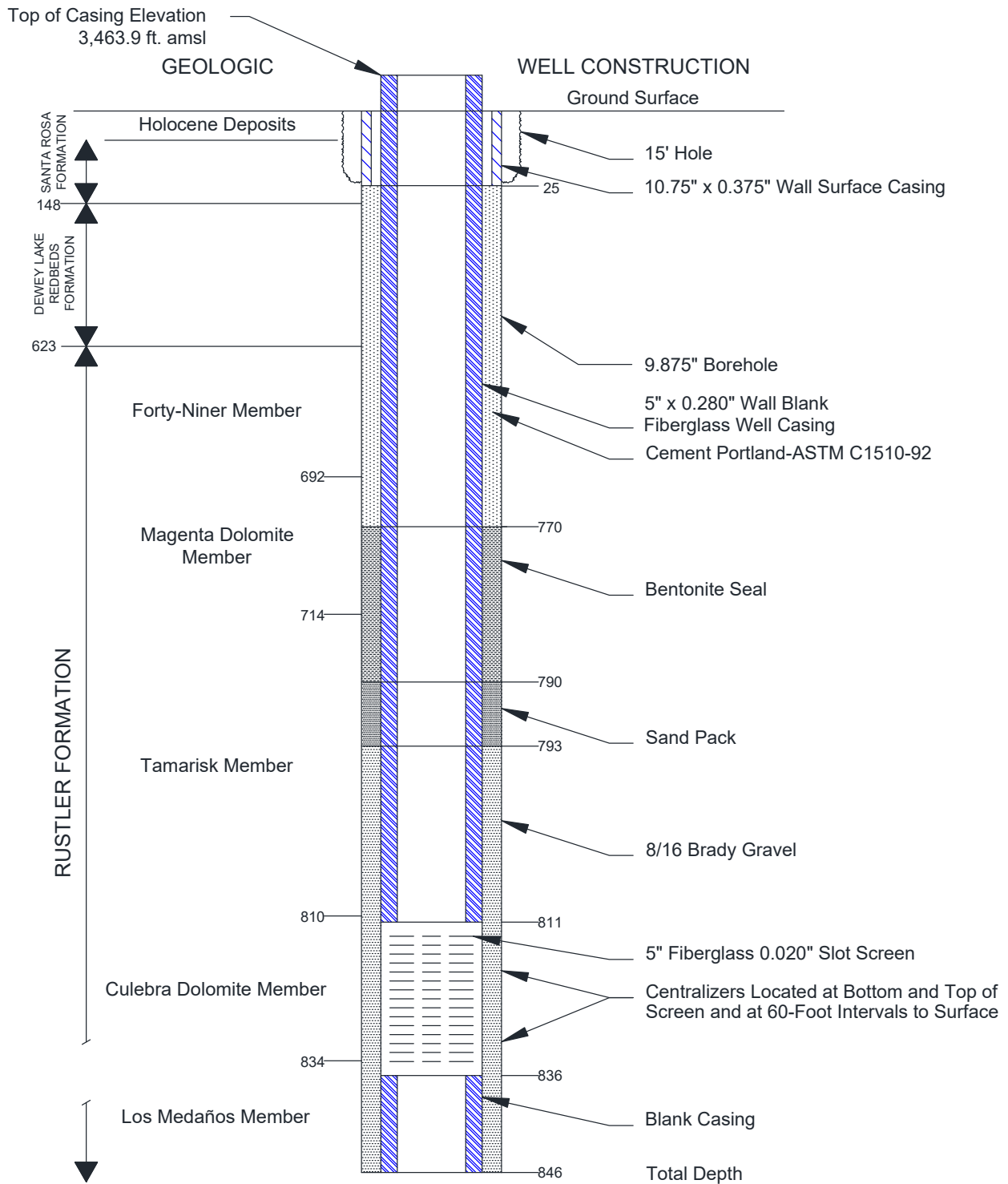
**Figure M-69**  
**Culebra Freshwater-Head Potentiometric Surface**



**Figure M-70**  
**Detection Monitoring Well Locations**

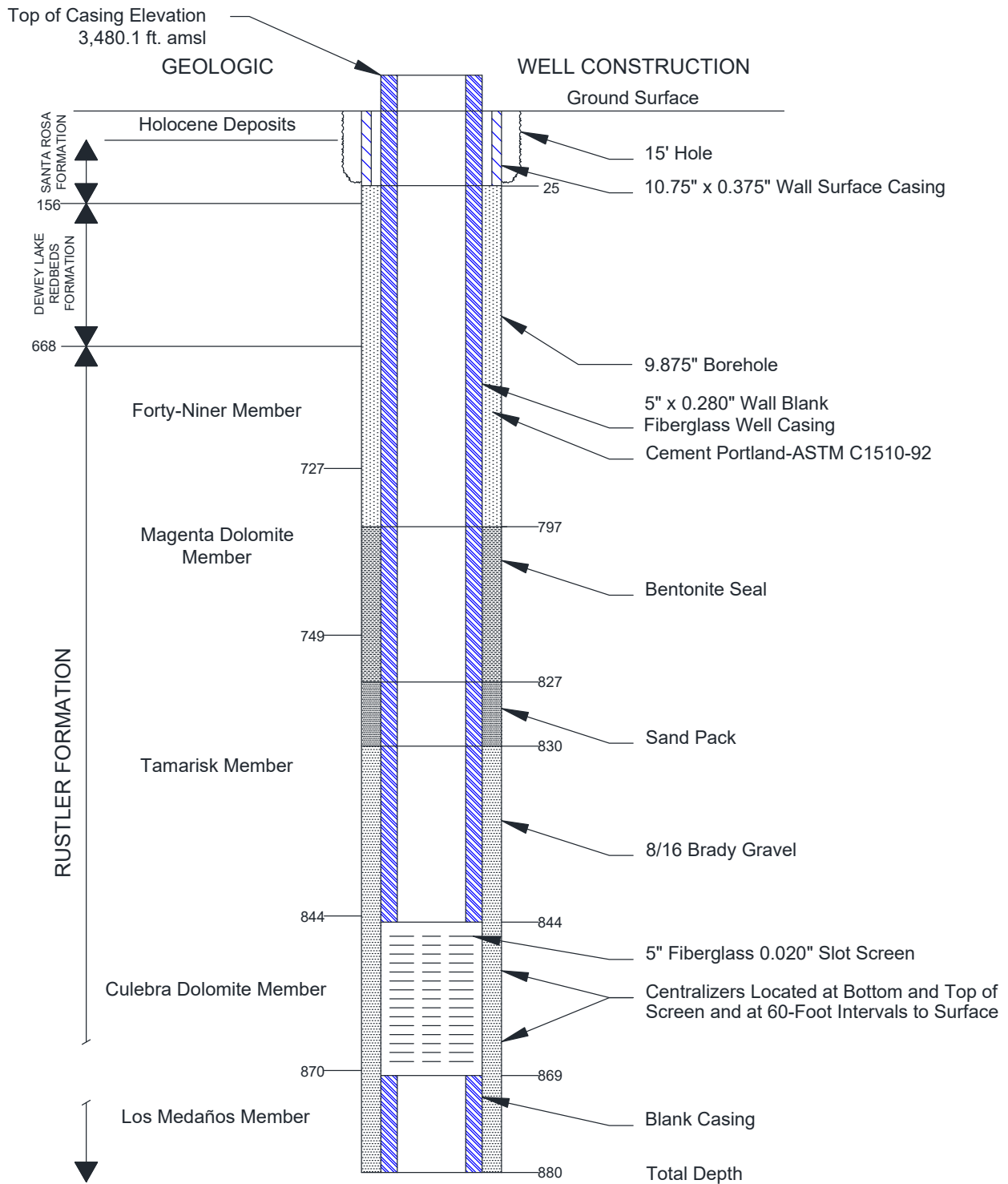


**Figure M-71**  
**As-Built Configuration of Well WQSP-1**



Note: Depths in feet bgs approximate.

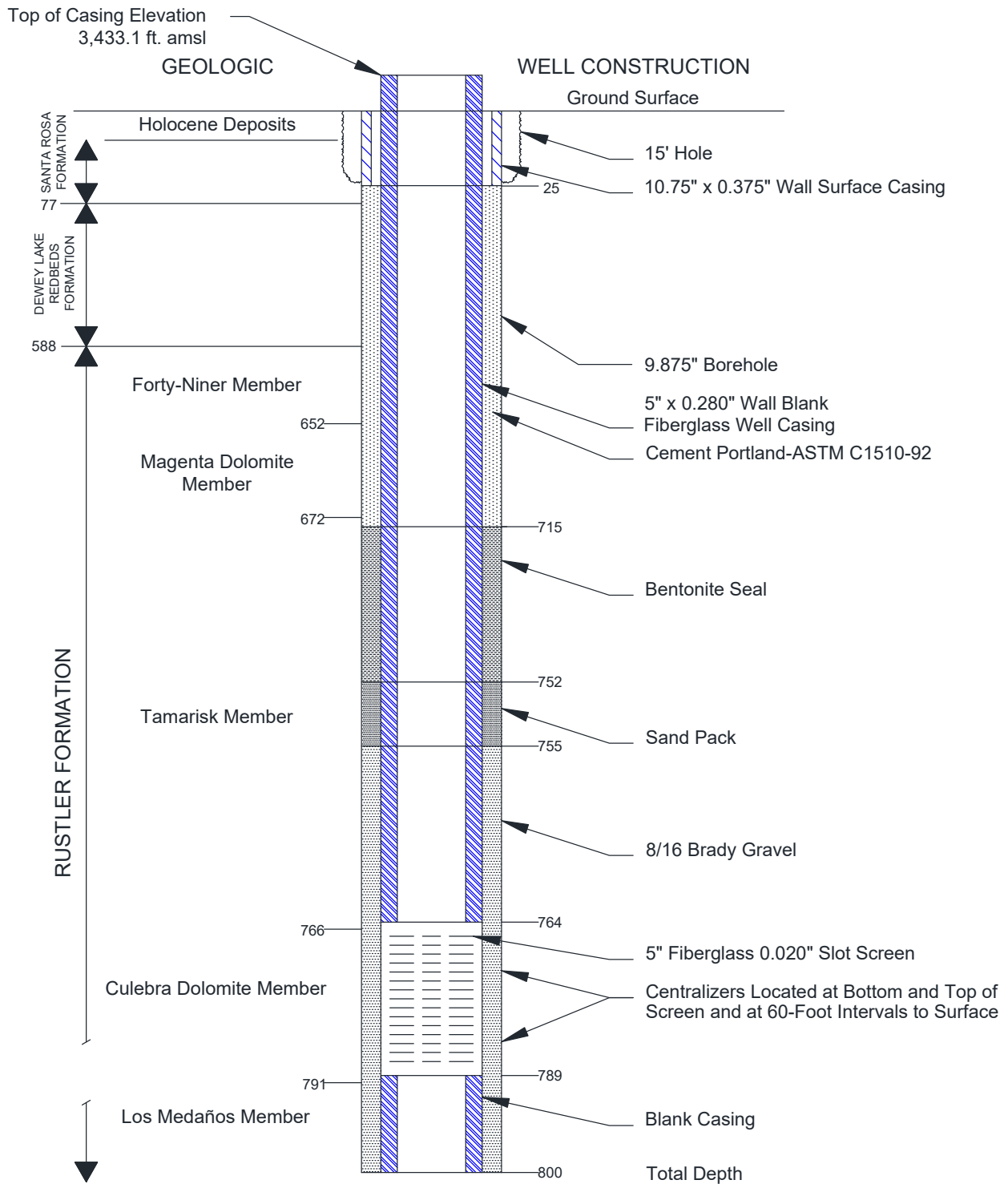
**Figure M-72**  
**As-Built Configuration of Well WQSP-2**



Note: Depths in feet bgs approximate.

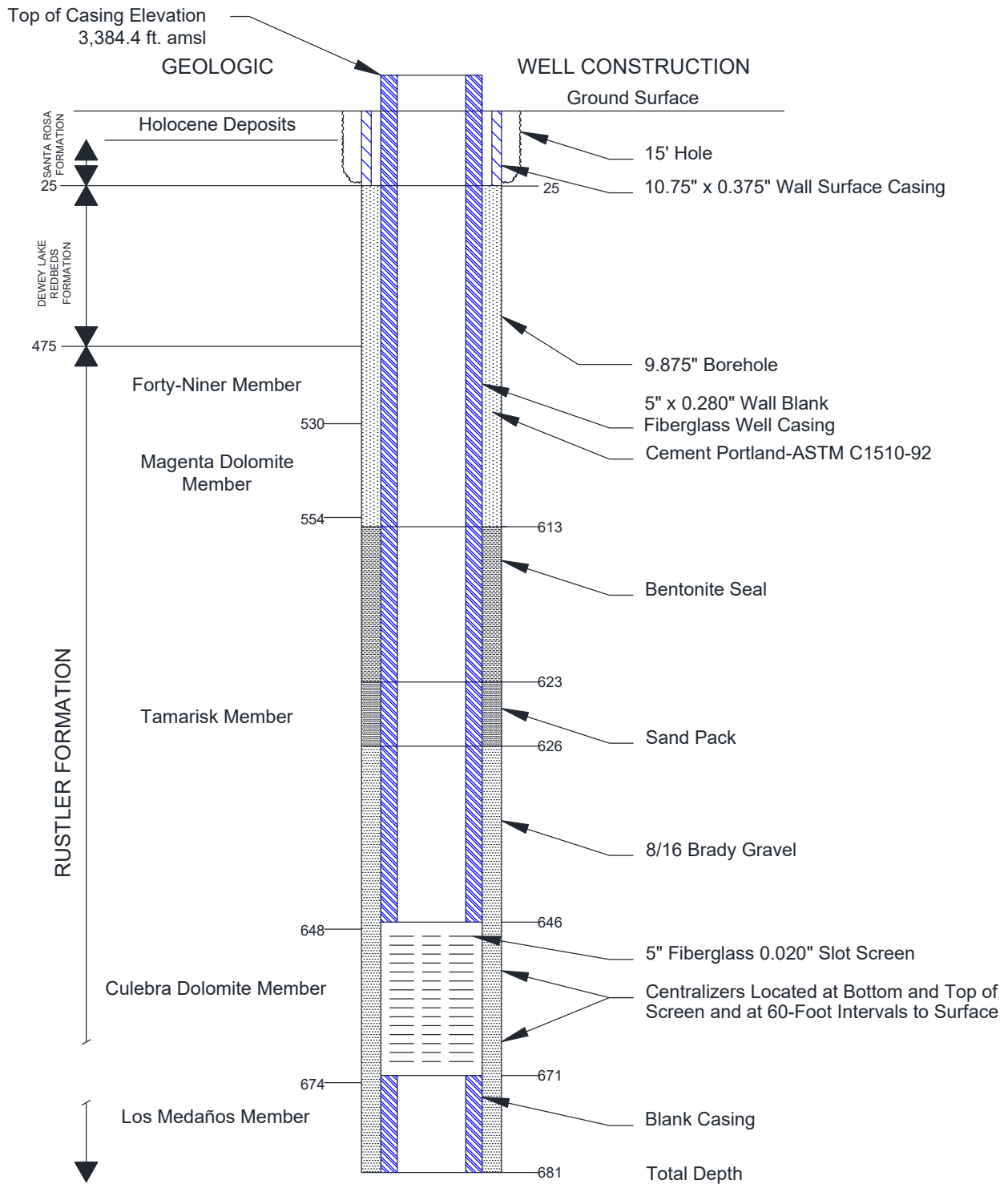
**Figure M-73**  
**As-Built Configuration of Well WQSP-3**



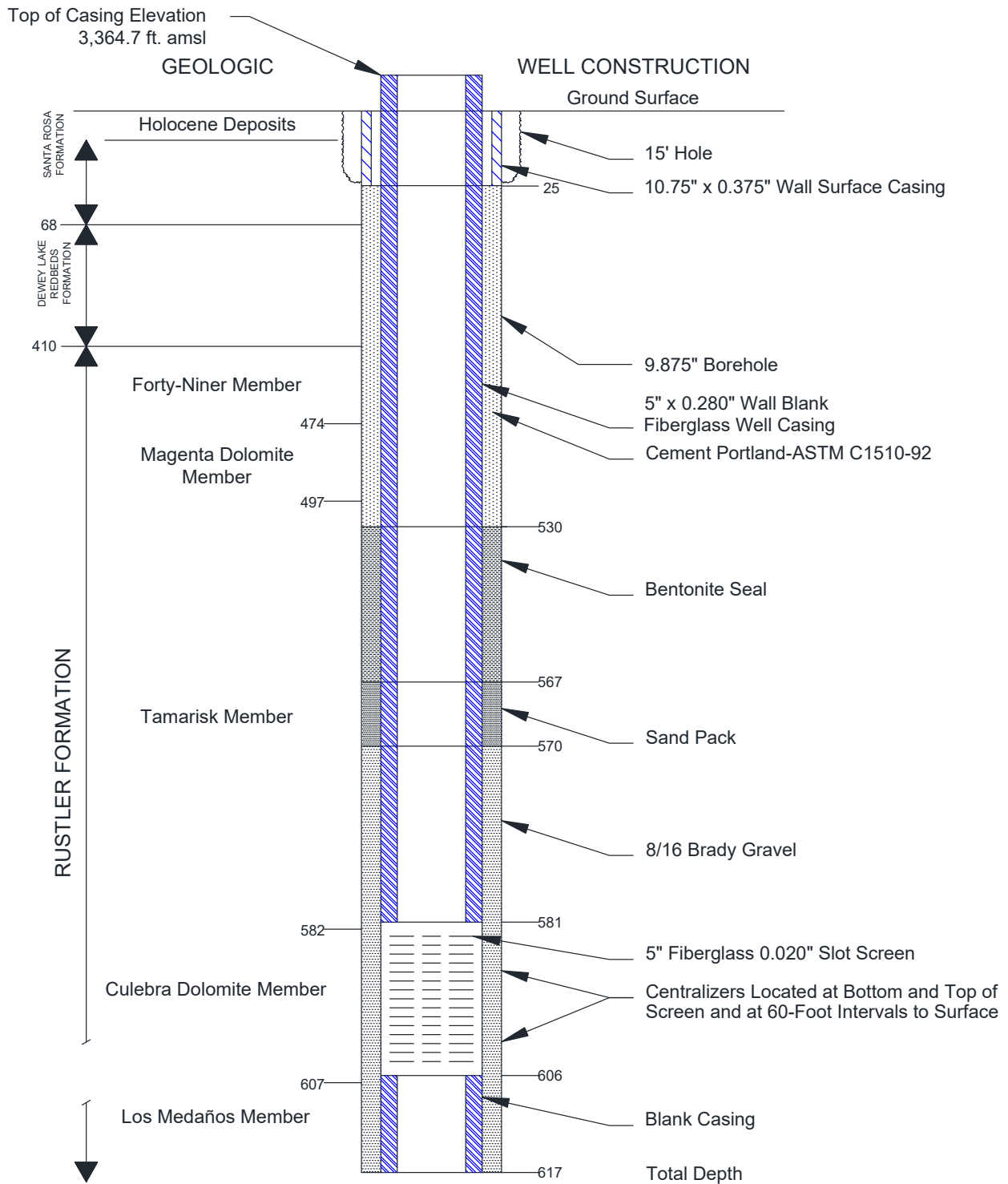


Note: Depths in feet bgs approximate.

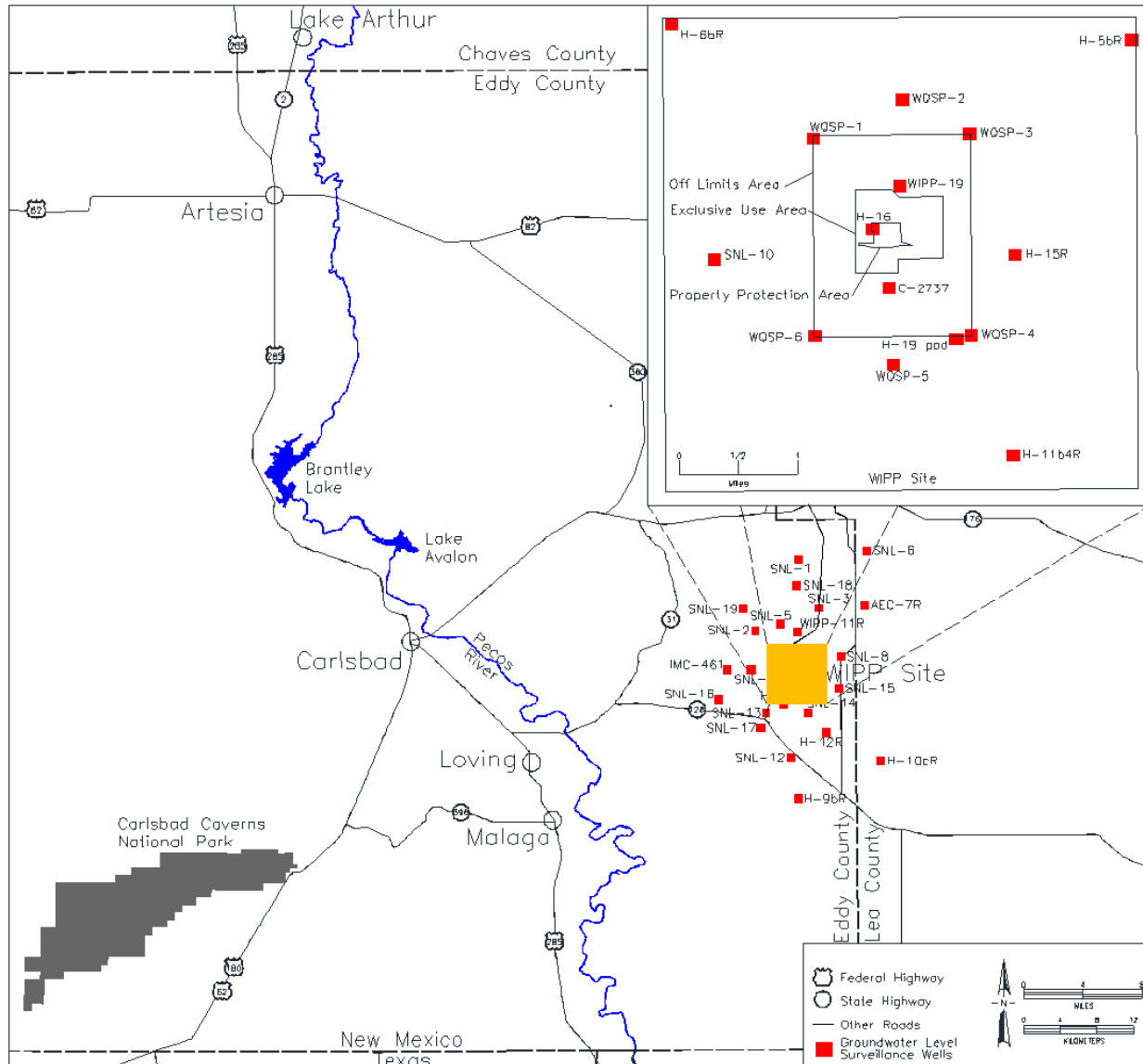
**Figure M-74**  
**As-Built Configuration of Well WQSP-4**



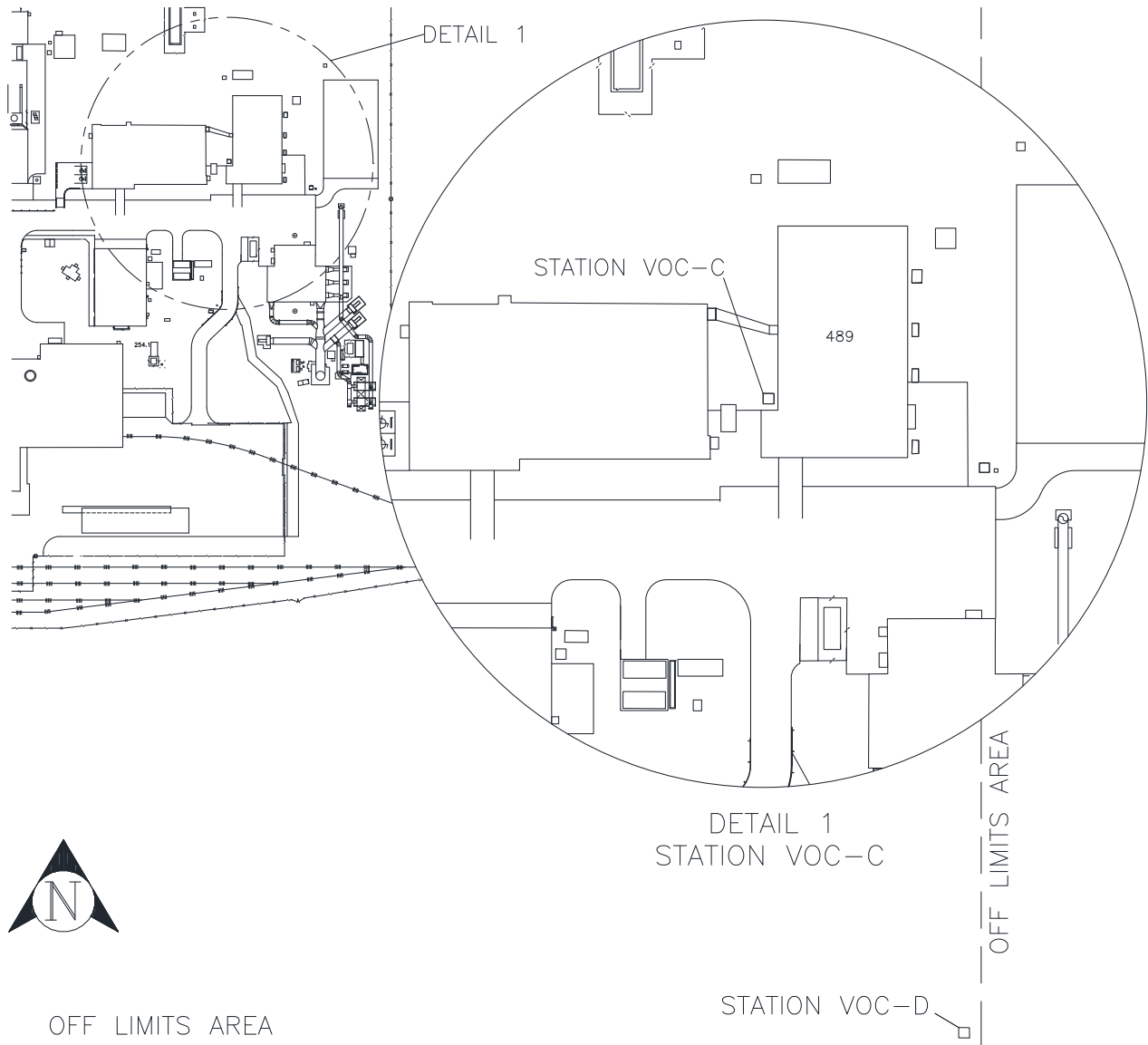
**Figure M-75**  
**As-Built Configuration of Well WQSP-5**



**Figure M-76**  
**As-Built Configuration of Well WQSP-6**

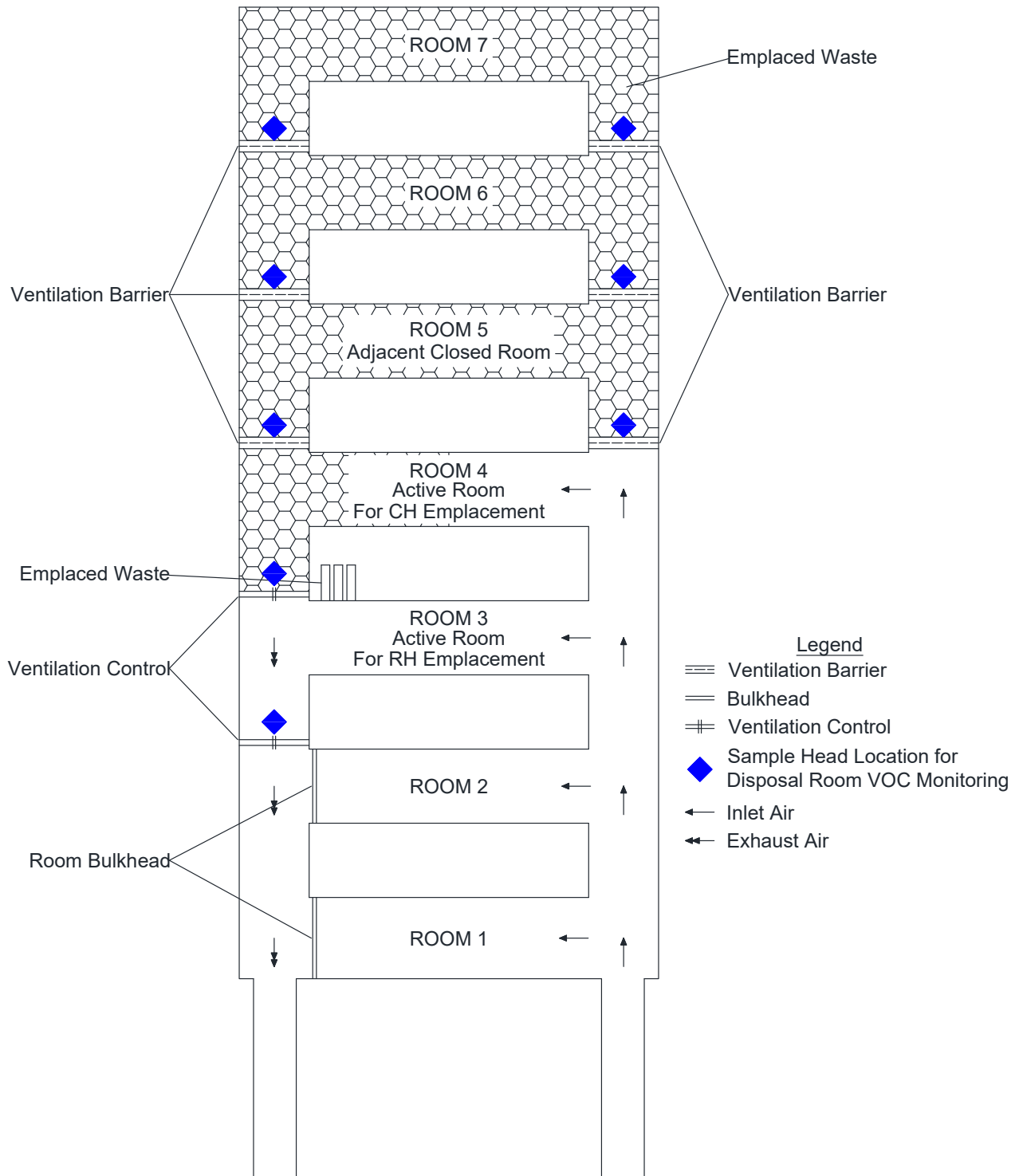


**Figure M-77**  
**Groundwater Level Surveillance Wells**  
 (inset represents the Groundwater Level Surveillance Wells within the WIPP Land Withdrawal Area)

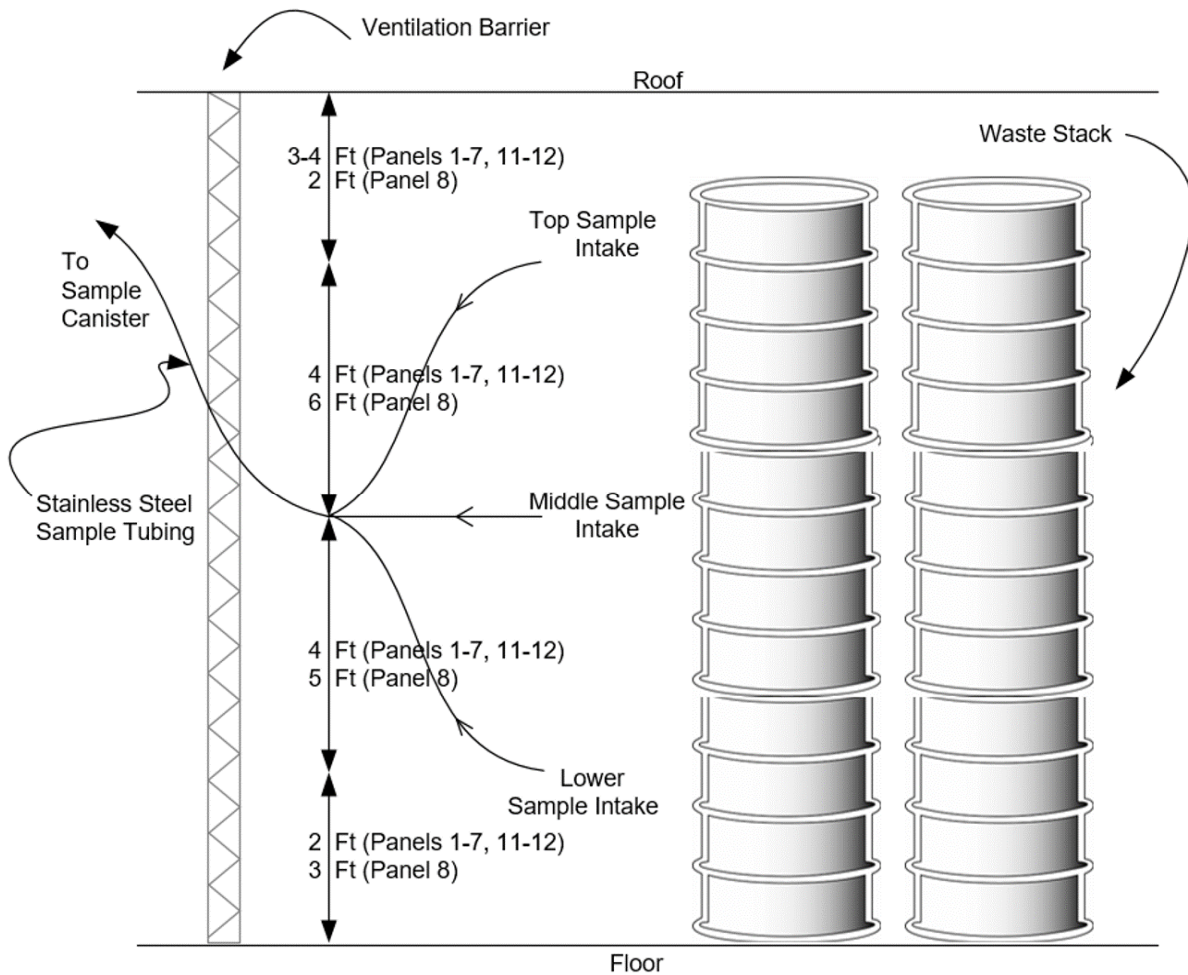


(see Figure D-1 and Figure D-1a for a detailed map and legend of the surface buildings)

**Figure M-78**  
**Repository VOC Monitoring Locations**

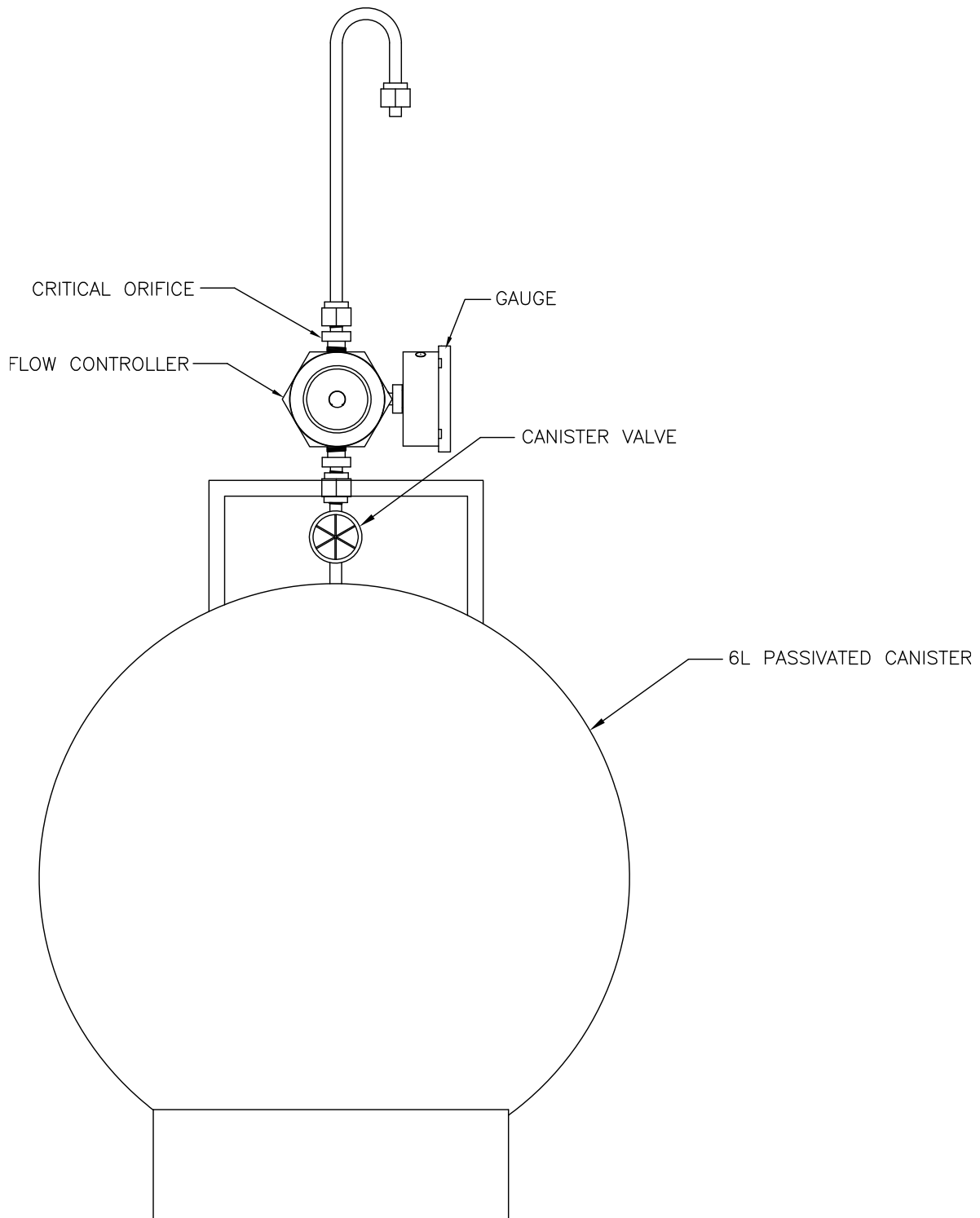


**Figure M-79**  
**Typical Disposal Room VOC Monitoring Locations**



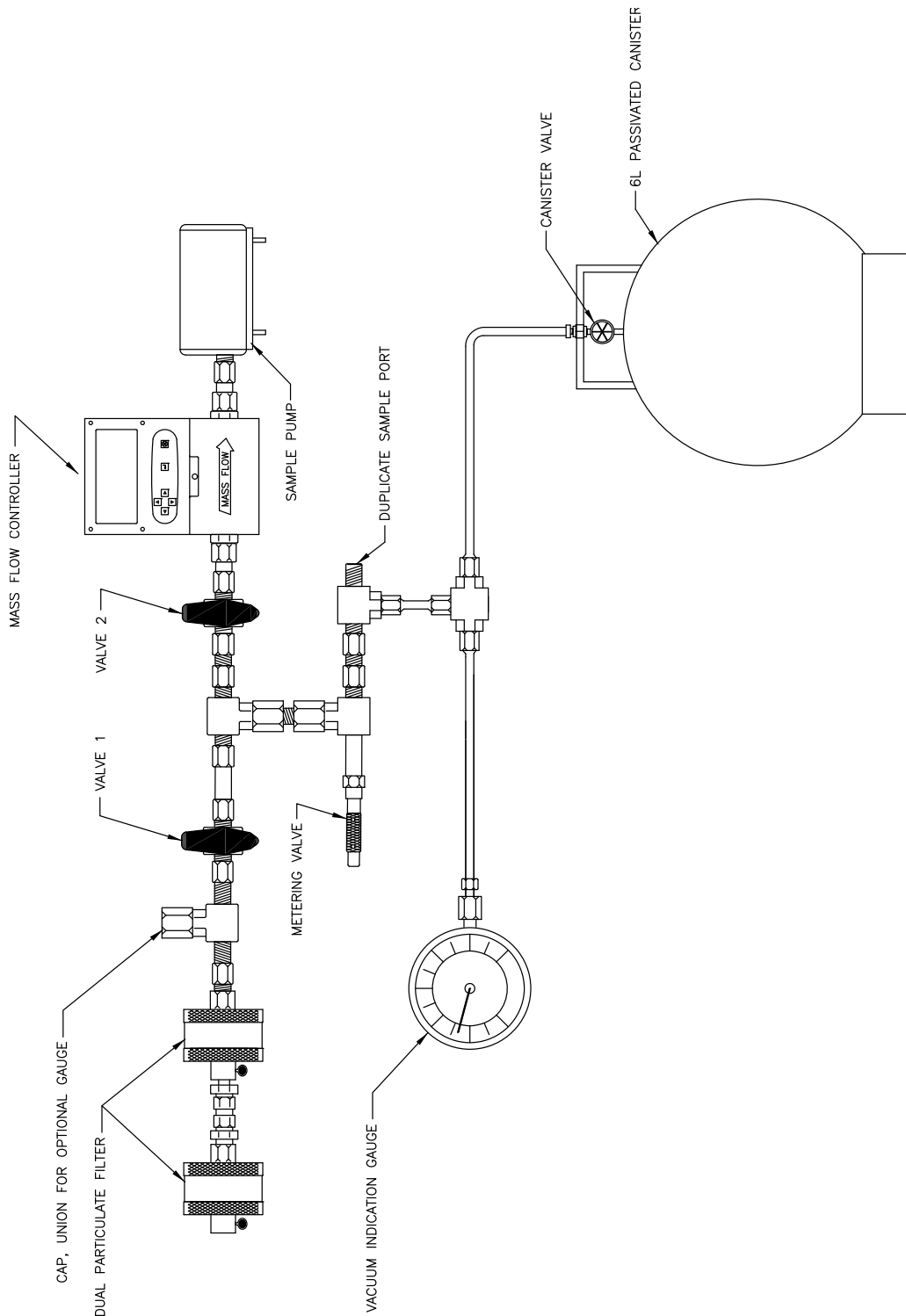
**Figure M-80**  
**Typical Disposal Room Sample Head Arrangement**





TYPICAL PASSIVE AIR-SAMPLING KIT WITH CANISTER

**Figure M-81**  
**VOC Monitoring System Design**



TYPICAL SUBATMOSPHERIC SAMPLING ASSEMBLY WITH CANISTER

**Figure M-82**  
**VOC Monitoring System Design (continued)**

**ATTACHMENT N**  
**VOLATILE ORGANIC COMPOUND MONITORING PLAN**

## ATTACHMENT N

### VOLATILE ORGANIC COMPOUND MONITORING PLAN

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## ACRONYMS, ABBREVIATIONS, AND UNITS

1		
2	ARA	additional requested analyte
3	BS/BSD	blank spike/blank spike duplicate
4	CFR	Code of Federal Regulations
5	CH	<del>contact</del> Contact-handled
6	CRQL	contract-required quantitation limit
7	DOE	U.S. Department of Energy
8	DRVMP	Disposal Room VOC Monitoring Program
9	EDD	electronic data deliverable
10	EPA	U.S. Environmental Protection Agency
11	ft	feet
12	GC/MS	gas chromatography/mass spectrometry
13	HI	hazard index
14	HWDU	Hazardous Waste Disposal Unit
15	IUR	inhalation unit risk
16	L	liter
17	LCS	laboratory control sample
18	LPEP	Laboratory Performance Evaluation Plan
19	m	meter
20	MDL	method detection limit
21	mm	millimeter
22	MOC	Management and Operating Contractor
23	MRL	method reporting limit
24	<del>mtorr</del>	<del>millitorr</del>
25	NIST	National Institute of Standards and Technology
26	NMAC	New Mexico Administrative Code
27	NMED	New Mexico Environment Department
28	PASK	passive air-sampling kit
29	ppbv	parts per billion by volume
30	ppmv	parts per million by volume
31	<del>PT</del>	<del>proficiency testing</del>
32	QA	quality assurance
33	QAPjP	Quality Assurance Project Plan
34	QC	quality control

1	RfC	reference concentration
2	RH	remote-handled
3	RPD	relative percent difference
4	RVMP	Repository VOC Monitoring Program
5	SOP	standard operating procedure
6	TIC	tentatively identified compound
7	TRU	transuranic
8	VOC	volatile organic compound
9	WIPP	Waste Isolation Pilot Plant

10



## ATTACHMENT N

### VOLATILE ORGANIC COMPOUND MONITORING PLAN

#### N-1 Introduction

This ~~Permit~~ Attachment N describes the monitoring plan for volatile organic compound (VOC) emissions from transuranic (TRU) mixed waste that may be entrained in the exhaust air from the U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) Underground Hazardous Waste Disposal Units (HWDUs) during the disposal phase at the facility. The purpose of VOC monitoring is to ensure compliance with the VOC action levels and limits specified in Permit Part 4. This VOC monitoring plan consists of two programs: (1) the Repository VOC Monitoring Program (RVMP), which assesses compliance with the action levels in Permit Part 4, Section 4.6.2.3; and (2) the Disposal Room VOC Monitoring Program (DRVMP) ~~(includes ongoing disposal room VOC monitoring)~~, which assesses compliance with the disposal room action levels and limits in Permit Part 4, Tables 4.4.1 and 4.4.2, ~~4.6.3.2, and 4.6.3.3~~. This plan includes the monitoring design, a description of sampling and analysis procedures, quality assurance (QA) objectives, and reporting activities.

#### N-1a Background

The Underground-underground HWDUs are located 2,150 feet (ft) (655 meters [m]) below ground surface ~~at the WIPP facility, in the WIPP underground. As defined for this Permit, an An~~ Underground-underground HWDU is a single excavated panel consisting of seven rooms and two access drifts designated for disposal of contact-handled (CH) and remote-handled (RH) ~~transuranic (TRU)-TRU~~ mixed waste. Each room in Panels 1-7 is approximately 300 ft (91 m) long, 33 ft (10 m) wide, and 13 ft (4 m) high. Each room in Panel 8 is approximately 300 ft (91 m) long, 33 ft (10 m) wide, and 16 ft (5 m) high. Each room in Panel 11 and Panel 12 will be approximately 300 ft (91 m) long, 33 ft (10 m) wide, and 14 ft (4.3 m) high. Access drifts connect the rooms and have the same cross section. The Permittees shall dispose of TRU mixed waste in Underground-underground HWDUs designated as Panels 1 through 8, 11, and 12.

This plan addresses the following elements:

1. Rationale for the design of the VOC monitoring programs, based on:

- Possible pathways from the WIPP underground HWDUs during the active life of the facility.
- Demonstrating compliance with the disposal room limits by monitoring VOCs in underground disposal rooms.
- Demonstrating compliance with the ambient air monitoring action levels by monitoring VOC emissions on the surface.
- VOC sampling operations at the WIPP facility, and
- Optimum locations for sampling.

2. Descriptions of the specific elements of the VOC monitoring programs, including:

- The type of monitoring conducted.
- Sampling locations.
- The monitoring interval.
- The specific hazardous constituents monitored.
- VOC monitoring schedule.
- Sampling equipment.
- Sampling and analytical techniques.
- Data recording/reporting procedures, and
- Notification and action levels for remedial action.

The technical basis for Disposal Room VOC Monitoring is discussed in detail in the Technical Evaluation Report for Room-Based VOC Monitoring (WRES, 2003).

N-1b Objectives of the Volatile Organic Compound Monitoring Plan

The CH and RH TRU mixed waste disposed in the WIPP ~~Underground-underground~~ HWDUs contain VOCs which could be released from ~~the~~ WIPP ~~underground facility~~ during the disposal phase of the project. This Plan describes how:

- VOCs released from waste panels will be monitored to confirm that the running annual average risk to the non-waste surface worker due to VOCs in the air emissions from the ~~Underground-underground~~ HWDUs do not exceed the action levels identified in Permit Part 4, Section 4.6.2.3- and calculated from measured VOC concentrations using risk factors identified in Table 4.6.2.3.- Appropriate remedial action, as specified in Permit Section 4.6.2.4, will be taken if the action levels in Permit Part 4, Section 4.6.2.3 are reached.
- The VOCs released from waste containers in disposal rooms will be monitored to confirm that the concentration of VOCs in the air of closed and active rooms in active panels do not exceed the VOC disposal room limits identified in Permit Part 4, Table 4.4.1-~~or Table 4.4.2~~, as appropriate. Remedial action, as specified in Permit Part 4, Section 4.6.3.3, will be taken if the original sample results are greater than or equal to the action levels in Permit Part 4, Table 4.6.3.2-~~or Table 4.6.3.3, as appropriate~~.

N-2 Target Volatile Organic Compounds

The target VOCs for repository monitoring (Station VOC-C and VOC-D) and disposal room monitoring are presented in Table N-1.

1 These target VOCs were selected because together they represent approximately 99 percent of  
2 the carcinogenic risk due to air emissions of VOCs.

### 3 N-3 Monitoring Design

4 Detailed design features of this plan are presented in this section. This plan uses available  
5 sampling and analysis techniques to measure VOC concentrations in air. Subatmospheric  
6 sample collection units are used in the Repository and Disposal Room VOC Monitoring  
7 Programs. These sample collection units are described in greater detail in Section N-4a(2).

#### 8 N-3a Sampling Locations

9 Air samples will be collected at the WIPP facility to quantify airborne VOC concentrations as  
10 described in the following sections.

##### 11 N-3a(1) Sampling Locations for Repository VOC Monitoring

12 Mine ventilation air, which could potentially be impacted by VOC emissions from the  
13 ~~Underground-underground~~ HWDUs identified as Panels 1 through 8, 11, and 12, will exit the  
14 underground through the Exhaust Shaft.- Building 489 has been identified as the location of the  
15 maximum non-waste surface worker exposure. Air samples will be collected from Station VOC-  
16 C located at the west air intake for Building 489 (Figure ~~M-78N-1~~) to quantify VOCs in the  
17 ambient air.- Background VOCs will be measured by sampling from Station VOC-D located at  
18 groundwater pad WQSP-4 (Figure ~~M-78N-1~~).- This pad is located approximately one mile  
19 southeast (upwind based on the predominant wind direction) of the Exhaust Shaft within the  
20 WIPP facility boundary.

##### 21 N-3a(2) Sampling Locations for Disposal Room VOC Monitoring

22 For purposes of compliance with Section 310 of Public Law 108-447, the ~~VOC~~-monitoring of  
23 airborne VOCs in underground disposal rooms in which waste ~~has been is~~ emplaced will be  
24 performed as follows (Figures M-79 and M-80):

- 25 1. ~~A sample Sample heads~~ will be installed, prior to the certification of a Panel, in inside the  
26 ~~disposal room behind the exhaust drift bulkhead and at the inlet side of the disposal~~  
27 ~~room and inlet sides of each disposal room, with the exception of Room 1. An inlet~~  
28 ~~sample head will not be installed in Room 1 because panel closure will commence once~~  
29 ~~Room 1 is filled.~~
- 30 2. Sampling at the exhaust side location is initiated when TRU mixed waste ~~will be is~~  
31 emplaced in the active disposal room. Sampling is initiated at the inlet location when the  
32 active disposal room is filled.
- 33 3. ~~When the active disposal room is filled, another sample head will be installed to the inlet~~  
34 ~~of the filled active disposal room. (Figure N-3 and N-4)~~
- 35 4. ~~The exhaust drift bulkhead will be removed and re-installed in the next disposal room so~~  
36 ~~disposal activities may proceed.~~

~~5. A ventilation barrier will be installed where the bulkhead was located in the active disposal room's exhaust drift. Another ventilation barrier will be installed in the active disposal room's air inlet drift, thereby closing that active disposal room.~~

~~63. Monitoring of VOCs will continue in the now closed disposal room.~~ Monitoring of VOCs will occur in the active disposal room and all the closed disposal rooms in which waste has been emplaced until commencement of panel closure activities (i.e., completion of ventilation barriers in Room 1).

~~This sequence for installing sample locations will proceed in the remaining disposal rooms until the inlet air ventilation barrier is installed in Room 1. An inlet sampler will not be installed in Room 1 because disposal room sampling proceeds to the next panel.~~

### N-3b Analytes to Be Monitored

The VOCs that have been identified for repository and disposal room VOC monitoring are listed in Table N-1. The analysis will focus on routine detection and quantification of these target analytes in collected samples. As part of the analytical evaluations, the presence of other compounds (i.e., non-target VOCs) will also be monitored. Some non-target VOCs may be included on the laboratory's target analyte list as additional requested analytes (**ARAs**) to gain a better understanding of potential concentrations and associated risk. The analytical laboratory will be directed to calibrate for ARAs, when necessary. The analytical laboratory will also be directed to classify and report other non-target VOCs as tentatively identified compounds (**TICs**) when tentative identification can be made. The evaluation of TICs in original samples will include those concentrations that are  $\geq 10$  percent of the relative internal standard. The evaluation of ARAs only includes concentrations that are greater than or equal to the MRLs listed in Table N-2.

Non-target VOCs classified as ARAs or TICs meet the following criteria: (1) are listed in Appendix VIII of 40 Code of Federal Regulations (**CFR**) Part 261 (incorporated by reference in 20.4.1.200 New Mexico Administrative Code (**NMAC**)), and (2) are detected in 10 percent or more of any original VOC monitoring samples collected over a 12-month timeframe. Non-target VOCs will be added, as applicable, to the analytical laboratory target analyte list for both the repository and disposal room VOC monitoring programs, unless the Permittees can justify their exclusion. Non-target VOCs reported as "unknown" by the analytical laboratory are not evaluated due to indeterminate identifications.

~~Information regarding additional~~Additional requested analytes and TICs detected in the repository and disposal room VOC monitoring programs will be placed in the WIPP Operating Record and reported to the New Mexico Environment Department (**NMED**) in the Semi-Annual VOC Monitoring Report as specified in Permit Part 4, Section 4.6.2.2. As applicable, the Permittees will also report the justification for exclusion of the ARA or TIC from the target analyte list (e.g., the compound does not contribute to more than one percent of the risk; the compound persists in the background samples at similar concentrations). If new targets are required, the Permittees will submit the appropriate permit modification annually (in October) to update Table 4.6.2.3 to include the new analyte and associated recommended U.S. Environmental Protection Agency (**EPA**) risk values for the inhalation unit risk (**IUR**) and reference concentration (**RfC**). Added compounds will be included in the risk assessment described in Section N-3e(1).

1 N-3c Sampling and Analysis Methods

2 ~~The VOC monitoring programs include a comprehensive VOC monitoring program established~~  
3 ~~at the facility; equipment, training, and documentation are already in place.~~

4 The sampling methods used for VOC monitoring are based on the concepts contained in the  
5 EPA Compendium Method TO-15 (EPA, 1999). The TO-15 sampling concept uses 6-liter  
6 passivated stainless-steel canisters to collect integrated air samples at each sample location.  
7 This conceptual method will be used as a reference for collecting the samples at the WIPP  
8 facility. The samples will be analyzed using gas chromatography/mass spectrometry (**GC/MS**)  
9 under an established QA/quality control (**QC**) program. Laboratory analytical procedures have  
10 been developed based on the concepts contained in both TO-15 and SW-846 Method 8260B.  
11 Section N-5 contains additional QA/QC information for this project.

12 The TO-15 method is an EPA-recognized sampling concept for VOC sampling and speciation. It  
13 can be used to provide subatmospheric samples, integrated samples, or grab samples, - as well  
14 as compound quantitation for a broad range of concentrations. This sampling technique is also  
15 viable for use while analyzing the sample using other EPA methods such as SW-846 Method  
16 8260B.

17 For subatmospheric sampling, air is collected in an initially evacuated passivated canister.  
18 When the canister is opened to the atmosphere, the differential pressure causes the sample to  
19 flow into the canister. - Flow rate and duration are regulated with a flow-restrictive inlet and flow  
20 controller. - The air will pass through a particulate filter to prevent sample and equipment  
21 contamination. - Passivated sampling equipment components are used to inhibit adsorption of  
22 compounds on the surfaces of the equipment. The required Method Reporting Limit (**MRL**) for  
23 the RVMP is 0.2 parts per billion by volume (**ppbv**) in SCAN mode and 0.1 ppbv in SIM mode.  
24 Consequently, low concentrations can be measured. - The required MRL for DRVMP is 500  
25 ppbv (0.5 parts per million by volume (**ppmv**)) to allow for reliable quantitation. The MRL is a  
26 function of instrument performance, sample preparation, sample dilution, and ~~all~~ steps involved  
27 in the sample analysis process. - The DRVMP will employ sample collection units that will  
28 provide a subatmospheric sample within a short duration (less than 1 hour). Passivated  
29 sampling lines will be installed in the disposal room as described in Section N-3a(2) and  
30 maintained (to the degree possible) after - the room is closed, until the panel associated with the  
31 room is closed. The independent lines will run from the sample inlet point to a sampling manifold  
32 located in an area accessible to sampling personnel.

33 N-3d Sampling Schedule

34 The Permittees will perform sampling on the following schedule in accordance with standard  
35 operating procedures.

36 N-3d(1) Sampling Schedule for Repository VOC Monitoring

37 Routine collection of a 24-hour time-integrated sample will be conducted two times per week.  
38 The RVMP sampling will continue until the certified closure of the last Underground  
39 underground HWDU.

1 N-3d(2) Sampling Schedule for Disposal Room VOC Monitoring

2 The disposal room sampling in open panels will occur once every two weeks, unless the need to  
3 increase the frequency to weekly occurs in accordance with Permit Section 4.6.3.3.

4 ~~Beginning with Panel 3, disposal room sampling in filled panels will occur monthly until final~~  
5 ~~panel closure unless an explosion isolation wall is installed. The Permittees will sample VOCs in~~  
6 ~~Room 1 of each filled panel.~~

7 N-3e Data Evaluation and Reporting

8 N-3e(1) Data Evaluation and Reporting for Repository VOC Monitoring

9 When the Permittees receive laboratory analytical data from an air-sampling event, the data will  
10 be validated as specified in Section N-5d. After obtaining validated data from an original surface  
11 VOC monitoring sample obtained during an ~~air-sampling~~air-sampling event, the data will be  
12 evaluated to determine whether the VOC emissions from the ~~Underground~~underground  
13 HWDUs exceed the action levels in Permit Part 4, Section 4.6.2.3. The values are calculated in  
14 terms of excess cancer risk for compounds believed to be carcinogenic and in terms of a hazard  
15 index (**HI**) for non-carcinogens using the following steps as follows:

16 Step 1: Calculate the carcinogenic risk (risk due to exposure to target) for the non-waste surface  
17 worker (for each target VOC) using the following equation:

$$R_{VOCj} = \frac{Conc_{VOCj} \times EF \times ED \times IUR_{VOCj} \times 1000}{AT} \quad (N-1)$$

19 Where:

20  $R_{VOCj}$  = Risk due to exposure to target VOC<sub>j</sub>

21  $Conc_{VOCj}$  = Concentration target VOC<sub>j</sub> at the receptor (milligram per cubic meter (mg/m<sup>3</sup>)),  
22 calculated as the concentration at VOC-C (mg/m<sup>3</sup>) – the concentration at VOC-D (mg/m<sup>3</sup>)

23  $EF$  = Exposure frequency (hours/year) = 1,920 hours per year

24  $ED$  = Exposure duration, years = 10 years

25  $IUR_{VOCj}$  = Inhalation unit risk factor from Table 4.6.2.3 (microgram per cubic meter  
26 (µg/m<sup>3</sup>)<sup>-1</sup>)

27  $AT$  = Averaging time for carcinogens, = 613,200 hours based on 70 years

28 1,000 = µg/mg

29 Step 2: Calculate the total carcinogenic risk. This is ~~then~~ the sum of the risk due to each  
30 carcinogenic target VOC:

$$\text{Total Carcinogenic Risk} = \sum_{j=1}^m R_{VOC_j} \quad \text{Total Carcinogenic Risk} = \sum_{j=1}^m R_{VOC_j} \quad (N-2)$$

Where:

Total Risk must be less than  $10^{-5}$

$m$  = the number of carcinogenic target VOCs

Step 3: Calculate ~~The formula for calculating~~ the non-carcinogenic hazard index ~~is similar:~~

$$HI_{VOC_j} = \frac{Conc_{VOC_j} \times EF \times ED}{AT \times RfC_{VOC_j}} \quad (N-3)$$

Where:

$HI_{VOC_j}$  = Hazard Index for exposure to target VOC<sub>j</sub>

$Conc_{VOC_j}$  = Concentration target VOC<sub>j</sub> at the receptor ( $mg/m^3$ ), calculated as the concentration at VOC-C ( $mg/m^3$ ) – the concentration at VOC-D ( $mg/m^3$ )

$EF$  = Exposure frequency (hours/year) = 1,920 hours per year

$ED$  = Exposure duration, years = 10 years

$RfC_{VOC_j}$  = Reference concentration from Table 4.6.2.3 ( $mg/m^3$ )

$AT$  = Averaging time for non-carcinogens, = 87,600 hours, based on exposure duration

Step 4: Calculate the ~~The~~ total hazard. This is the sum of the hazard index due to each non-carcinogenic target VOC:

$$\text{Total Hazard Index} = \sum_{j=1}^m HI_{VOC_j} \quad (N-4)$$

Where:

Hazard Index must be less than or equal to 1.0

$m$  = the number of non-carcinogenic target VOCs

The total carcinogenic risk (Equation N-2) and the total HI (Equation N-4) calculated from the surface VOC concentrations for each sampling event will be compared directly to the action levels in Permit Part 4, Section 4.6.2.3. This will establish whether the combined effect of any of the concentrations of VOCs in the emissions from the Underground-underground HWDUs exceeded the risk and HI action levels at the time of the sampling.



1 As specified in Permit Part 4, the Permittees shall notify the Secretary in writing, within seven  
2 calendar days of obtaining validated analytical results, whenever the risk or HI exceeds the  
3 action levels specified in Permit Part 4, Section 4.6.2.3.

4 The surface VOC concentrations for each target VOC that is calculated for each sampling event  
5 will then be averaged with the surface VOC- concentrations calculated for the air-sampling  
6 events conducted during the previous 12 months. This will be considered the running annual  
7 average concentration for each target VOC. The running annual average risk and HI will be  
8 compared to action levels specified in Permit Part 4, Section 4.6.2.3.- When a VOC is added to  
9 the target analyte list, the running annual average concentration will be calculated using all  
10 available data.

11 As specified in Permit Part 4, the Permittees shall notify the Secretary in writing, within seven  
12 calendar days of obtaining validated analytical results, whenever the running annual average  
13 risk or HI (calculated after each sampling event) exceeds the action levels specified in Permit  
14 Part 4, Section 4.6.2.3.

15 The Permittees will maintain a database with the VOC air-sampling data and the results will be  
16 reported to the Secretary as specified in Permit Part 4.

#### 17 N-3e(2) Data Evaluation and Reporting for Disposal Room VOC Monitoring

18 When the Permittees receive laboratory analytical data from an air-sampling event, the data will  
19 be validated as specified in Section N-5d. The validated data will be evaluated to determine  
20 whether the VOC concentrations in the air of any closed room, the active open room, or the  
21 immediately adjacent closed room exceeded the Action Levels-action levels for DRVMP  
22 specified in Permit Part 4, Table 4.6.3.2-or Table 4.6.3.3, as appropriate.

23 The Permittees shall notify the Secretary in writing, within seven calendar days of obtaining  
24 validated analytical results, whenever the concentration of any VOC specified in Permit Part 4,  
25 Table 4.4.1 or Table 4.4.2 exceeds the action levels specified in Permit Part 4, Table 4.6.3.2-or  
26 Table 4.6.3.3, respectively.

27 The Permittees shall submit to the Secretary the Semi-Annual VOC Monitoring Report specified  
28 in Permit Section 4.6.2.2 that also includes results from disposal room VOC monitoring.

#### 29 N-4 Sampling and Analysis Procedures

30 This section describes the equipment and procedures that will be implemented during sample  
31 collection and analysis activities for VOCs at the WIPP facility.

#### 32 N-4a Sampling Equipment

33 The sampling equipment that will be used includes: 6-liter (L) stainless-steel passivated  
34 canisters, passive air-sampling kits (**PASKs**), subatmospheric sampling assemblies, passivated  
35 stainless-steel tubing, and one or more in-line filters. A discussion of each of these items is  
36 presented below.

1 N-4a(1) Sample Canisters

2 Six-liter, stainless-steel canisters with passivated interior surfaces will be used to collect and  
3 store all ambient air and disposal room samples for VOC analyses collected as part of the  
4 monitoring processes. These canisters will be cleaned and certified (batch certification  
5 acceptable for disposal room monitoring) prior to their use, in a manner similar to that described  
6 by Compendium Method TO-15. The canisters will be certified clean to below the required  
7 reporting limits for the VOC analytical method for the target VOCs. The vacuum of certified  
8 clean canisters will be verified as adequate upon initiation of a sample cycle as described in  
9 standard operating procedures (**SOPs**).- The sample canisters are initially evacuated at the  
10 analytical laboratory to <0.05 millimeter of mercury (mm Hg) (50 millitorr).

11 N-4a(2) Sample Collection Units

12 The sample collection unit for surface VOC samples is a commercially available PASK  
13 comprised of components that regulate the rate and duration of air flow into a sample canister.  
14 It can be operated either manually, using canister valves, or unattended, using a programmable  
15 timer.

16 The sample collection unit for disposal room VOC monitoring is a subatmospheric sampling  
17 assembly that regulates the rate and duration of air flow into a sample canister.- The  
18 subatmospheric sampling assembly also allows for purging of sample lines to ensure that a  
19 representative sample is collected.

20 Sample collection units will use passivated components for the sample flow path.- When sample  
21 canisters installed on sample collection units are opened to the atmosphere, the differential  
22 pressure causes the sample to flow into the canister at a regulated rate.- By the end of each  
23 sampling period, the canisters will be near atmospheric pressure.- Detailed instructions on  
24 sample collection will be given in SOPs. A conceptual diagram of the VOC sample collection  
25 units are is provided in Figures M-81 and M-82N-2.

26 N-4a(3) Sample Tubing

27 The tubing used as a sample path is comprised of passivated stainless-steel to prevent the  
28 inner walls from absorbing sample constituents and/or contaminants when they are pulled from  
29 the sample point to the sample collection unit.

30 N-4b Sample Collection

31 Sample collection for VOCs at the WIPP facility will be conducted in accordance with written  
32 SOPs that are kept on file at the facility. -These SOPs will specify the steps necessary to ensure  
33 the collection of samples that are of acceptable quality to meet the applicable data quality  
34 objectives in Section N-5.

35 Repository VOC samples will be 24-hour time-integrated samples for each sampling event.  
36 Alternative sampling durations may be defined for assessment purposes and to meet the data  
37 quality objectives.- The selection of sampling days will be specified in SOPs and will be  
38 alternated from week-to-week in order to avoid potential bias created by plant operations.

1 Sample flow for the PASK will be set using an in-line mass flow ~~controller~~meter. The flow  
2 ~~controllers-meters~~ are initially factory-calibrated and specify a typical accuracy of better than 10  
3 percent full scale. Additionally, each air flow ~~controller-meter~~ is calibrated at a manufacturer-  
4 specified frequency using a National Institute of Standards and Technology (NIST) primary flow  
5 standard.

6 To verify the matrix similarity and assess field-sampling precision, field duplicate samples will  
7 be collected (two canisters filled simultaneously) for each VOC monitoring program at an overall  
8 frequency of at least ~~5~~five percent (see Section N-5a).

9 Prior to collecting the active open disposal room and closed room samples, the sample lines are  
10 purged to ensure that the air collected is not air that has been stagnant in the tubing. This is  
11 important in regard to the disposal room sample because of the long lengths of tubing  
12 associated with these samples.

#### 13 N-4c Sample Management

14 Field-sampling data sheets will be used to document the sampler conditions under which each  
15 sample is collected. These data sheets have been developed specifically for VOC monitoring at  
16 the WIPP facility. The individuals assigned to collect the specific samples will be required to fill  
17 in all of the appropriate sample data and to maintain this record in sample logbooks. The  
18 program team leader will review these forms for each sampling event.

19 All sample containers will be marked with identification at the time of collection of the sample. A  
20 Request-for-Analysis Form will be completed to identify the sample canister number(s), sample  
21 type and type of analysis requested.

22 All samples will be maintained, and shipped if necessary, at ambient temperatures. Collected  
23 samples will be transported in appropriate containers. Prior to leaving the underground for  
24 analysis, sample containers may undergo radiological screening, which will ensure that  
25 contaminated samples or equipment will not be transported to the surface. Samples will not be  
26 accepted by the receiving laboratory personnel unless they are properly labeled and sealed to  
27 ensure a tamper-free shipment.

28 An important component of the sampling program is a demonstration that collected samples  
29 were obtained from the locations stated and that they reached the laboratory without alteration.  
30 To satisfy this requirement, evidence of collection, shipment, laboratory receipt, and custody will  
31 be documented with a completed Chain-of-Custody Form. Chain-of-custody procedures will be  
32 followed closely, and additional requirements imposed by the laboratory for sample analysis will  
33 be included as necessary.

34 Individuals collecting samples will be responsible for the initiation of custody procedures. The  
35 chain of custody will include documentation as to the canister certification, location of sampling  
36 event, time, date, and the name of the individual handling the samples. Deviations from  
37 procedure will be considered variances. Variances must be preapproved by the program  
38 manager and recorded in the project files. Unintentional deviations, sampler malfunctions, and  
39 other problems are nonconformances. Nonconformances must be documented and recorded in  
40 the project files. All field logbooks/data sheets must be incorporated into the Permittees' WIPP's  
41 records management program.

1 N-4d Maintenance of Sample Collection Units

2 Periodic maintenance for sample collection units and associated equipment will be performed  
3 as needed. This maintenance may include cleaning, replacement of damaged or malfunctioning  
4 parts, and leak testing. Additionally, complete spare sample collection units will be maintained  
5 on-site to minimize downtime because of equipment malfunction.

6 N-4e Analytical Procedures

7 Analytical procedures used in the analysis of VOC samples from canisters are based on  
8 concepts contained in Compendium Method TO-15 (EPA, 1999) and in SW-846 Method 8260B  
9 (EPA, ~~2015~~1996).

10 Analysis of samples will be performed by a certified laboratory. Methods will be specified in  
11 procurement documents and will be selected to be consistent with Compendium Method TO-15  
12 (EPA, 1999) or EPA recommended procedures in SW-846 (EPA, ~~2015~~1996). Additional detail  
13 on analytical techniques and methods will be given in laboratory SOPs.

14 The Permittees will establish the criteria for laboratory selection, including the stipulation that  
15 the laboratory follow the procedures specified in the appropriate Air Compendium or SW-846  
16 method and that the laboratory follow EPA protocols. The selected laboratory shall demonstrate,  
17 through laboratory SOPs, that it will follow appropriate EPA SW-846 requirements and the  
18 requirements specified by the EPA Air Compendium protocols. The laboratory shall also provide  
19 documentation to the Permittees describing the sensitivity of laboratory instrumentation. This  
20 documentation will be retained in the facility ~~operating~~Operating record Record and will be  
21 available for review upon request by NMED.

22 The SOPs for the laboratory currently under contract will be maintained in the ~~operating~~  
23 Operating record Record by the Permittees. The Permittees will provide NMED with an initial set  
24 of applicable laboratory SOPs for information purposes, and provide NMED with ~~any~~  
25 SOPs ~~on an annual basis by January 31~~upon request.

26 Data validation will be performed by the Permittees. Copies of the data validation report will be  
27 kept on file in the ~~operating~~Operating record Record for review upon request by NMED.

28 N-5 Quality Assurance

29 The QA activities for the VOC monitoring programs will be conducted in accordance with the  
30 documents: *EPA Guidance for Quality Assurance Project Plans QA/G-5* (EPA, 2002) and the  
31 *EPA Requirements for Preparing Quality Assurance Project Plans, QA/R-5* (EPA, 2001). The  
32 QA criteria for the VOC monitoring programs are listed in Table N-2. This section addresses the  
33 methods to be used to evaluate the components of the measurement system and how this  
34 evaluation will be used to assess data quality. The QA limits for the sampling procedures and  
35 laboratory analysis shall be in accordance with the limits set forth in the specific EPA Method  
36 referenced in standard operating procedures employed by either the Permittees or the  
37 laboratory. The Permittees standard operating procedures will be in the facility Operating  
38 Record and available for review by NMED ~~at anytime~~upon request. The laboratory standard  
39 operating procedures will also be in the facility Operating Record and will be supplied to the  
40 NMED as indicated in Section N-4e.

1 N-5a Quality Assurance Objectives for the Measurement of Precision, Accuracy,  
2 Sensitivity, and Completeness

3 QA objectives for this plan will be defined in terms of the following data quality parameters.

4 **Precision.** For the duration of this program, precision will be defined and evaluated by the RPD  
5 values calculated between field duplicate samples and between laboratory duplicate samples.

$$6 \quad \frac{RPD = \left( \frac{(A - B)}{(A + B)/2} \right) * 100}{\text{---}} \quad RPD = \frac{(A - B)}{(A + B)/2} \times 100 \quad (N-5)$$

7 Where

8 *A = Original sample result*

9 *B = Duplicate sample result*

10 **Accuracy.** Analytical accuracy will be defined and evaluated through the use of analytical  
11 standards. Because recovery standards cannot reliably be added to the sampling stream,  
12 overall system accuracy will be based on analytical instrument performance evaluation criteria.  
13 These criteria will include performance verification for instrument calibrations, laboratory control  
14 samples, sample surrogate recoveries (when required by method or laboratory SOPs), and  
15 sample internal standard areas. Use of the appropriate criteria as determined by the analytical  
16 method performed, will constitute the verification of accuracy for target analyte quantitation  
17 (i.e., quantitative accuracy). Evaluation of standard ion abundance criteria for  
18 bromofluorobenzene~~BFB~~ will be used to evaluate the accuracy of the analytical system in the  
19 identification of targeted analytes, as well as the evaluation of unknown contaminants (i.e.,  
20 qualitative accuracy).

21 **Sensitivity.** Sensitivity will be defined by the required MRLs for the program. Attainment of  
22 required MRLs will be verified by the performance of statistical method detection limit (**MDL**)  
23 studies in accordance with 40 ~~Code of Federal Regulations § CFR Part~~ 136. The MDL  
24 represents the minimum concentration that can be measured and reported with 99 percent  
25 confidence that the analyte concentration is greater than zero. An MDL study will be performed  
26 by the program analytical laboratory prior to sampling and analysis, and annually thereafter.

27 **Completeness.** Completeness will be defined as the percentage of the ratio of the number of  
28 valid sample results received (i.e., those which meet data quality objectives) versus the total  
29 number of samples collected. Completeness may be affected, for example, by sample loss or  
30 destruction during shipping, by laboratory sample handling errors, or by rejection of analytical  
31 data during data validation.

32 N-5a(1) Evaluation of Laboratory Precision

33 Laboratory sample duplicates and blank spike/blank spike duplicates (**BS/BSD**) will be used to  
34 evaluate laboratory precision. QA objectives for laboratory precision are listed in Table N-2, and  
35 are based on precision criteria proposed by the EPA for canister sampling programs (EPA,  
36 1991). These values will be appropriate for the evaluation of samples with little or no matrix  
37 effects. Because of the potentially high level of salt-type aerosols in the WIPP underground

1 environment, the analytical precision achieved for WIPP samples may vary with respect to the  
2 EPA criteria. RPDs for BS/BSD analyses will be tracked through the use of control charts. RPDs  
3 obtained for laboratory sample duplicates will be compared to those obtained for BS/BSDs to  
4 ascertain any sample matrix effects on analytical precision. BS/BSDs and laboratory sample  
5 duplicates will be analyzed at a frequency of 10 percent, or one per analytical lot, whichever is  
6 more frequent.

#### 7 N-5a(2) Evaluation of Field Precision

8 Field duplicate samples will be collected at a frequency of at least ~~5~~five percent for the RVMP  
9 and at least ~~5~~five percent for the DRVMP. The data quality objective for field precision is 35  
10 percent for each set of field duplicate samples.

#### 11 N-5a(3) Evaluation of Laboratory Accuracy

12 Quantitative analytical accuracy will be evaluated through performance criteria on the basis of  
13 (1) relative response factors generated during instrument calibration, (2) analysis of laboratory  
14 control samples (**LCS**), and (3) recovery of internal standard compounds. The criteria for the  
15 initial calibration (~~5~~five-point calibration) is  $\leq$  30 percent relative standard deviation for target  
16 analytes. After the successful completion of the ~~5~~five-point calibration, it is sufficient to analyze  
17 only a midpoint standard for every 24 hours of operation. The midpoint standard will pass a 30  
18 percent difference acceptance criterion for each target compound before sample analysis may  
19 begin.

20 A blank spike or LCS is an internal QC sample generated by the analytical laboratory by spiking  
21 a standard air matrix (humid zero air) with a known amount of a certified reference gas. The  
22 reference gas will contain the target VOCs at known concentrations. Percent recoveries for the  
23 target VOCs will be calculated for each LCS relative to the reference concentrations. Objectives  
24 for percent recovery are listed in Table N-2, and are based on accuracy criteria proposed by the  
25 EPA for canister sampling programs (EPA, 1991). ~~LCSs~~Laboratory control samples will be  
26 analyzed at a frequency of 10 percent, or one per analytical lot, whichever is more frequent.

27 Internal standards will be introduced into each sample analyzed, and will be monitored as a  
28 verification of stable instrument performance. In the absence of any unusual interferences,  
29 areas should not change by more than 40 percent over a 24-hour period. Deviations larger than  
30 40 percent are an indication of a potential instrument malfunction. If an internal standard area in  
31 a given sample changes by more than 40 percent, the sample will be reanalyzed. If the 40  
32 percent criterion is not achieved during the reanalysis, the instrument will undergo a  
33 performance check and the midpoint standard will be reanalyzed to verify proper operation.  
34 Response and recovery of internal standards will also be compared between samples, LCSs,  
35 and calibration standards to identify any matrix effects on analytical accuracy.

#### 36 N-5a(4) Evaluation of Sensitivity

37 The presence of aerosol salts in underground locations may affect the MDL of the samples  
38 collected in those areas. The sample inlet of these sample collection units will be protected  
39 sufficiently from the underground environment to minimize salt aerosol interference. Up to two  
40 filters, inert to VOCs, will be installed in the sample flow path to minimize particulate  
41 interference.



1 The MDL for each of the target VOCs will be evaluated by the analytical laboratories before  
2 sampling begins. The initial and annual MDL evaluation will be performed in accordance with 40  
3 ~~Code of Federal Regulations §CFR Part~~ 136, and with EPA/530-SW-90-021, as revised and  
4 retitled, "Project Quality Assurance and Quality Control" (Chapter 1 of SW-846) (~~2015~~1996).

5 N-5a(5) Completeness

6 The expected completeness for this program is greater than or equal to 95 percent. Data  
7 completeness will be tracked monthly.

8 N-5b Sample Handling and Custody Procedures

9 Sample packaging, shipping, and custody procedures are addressed in Section N-4c.

10 N-5c Calibration Procedures and Frequency

11 Calibration procedures and frequencies for analytical instrumentation are listed in Section N-4e.

12 N-5d Data Reduction, Validation, and Reporting

13 ~~Field-sampling data sheets will contain documentation of all pertinent data for the sampling and~~  
14 ~~will~~ at a minimum include the following; sample identification, sample location, sample collection  
15 date, initial vacuum, ending vacuum, collection start and collection stop time, and flow rate ~~and~~  
16 ~~ambient temperature~~.

17 Data validation procedures will include at a minimum, a check of all field data sheets for  
18 completeness and correctness. Sample custody and analysis records will be reviewed by the  
19 analytical laboratory QA officer and the analytical laboratory supervisor at a frequency of at least  
20 10 percent.

21 Electronic Data Deliverables (**EDDs**) are provided by the laboratory prior to receipt of ~~hard~~  
22 ~~certified~~ copy data packages. Electronic Data Deliverables~~EDDs~~ will be evaluated within five  
23 calendar days of receipt to determine if VOC concentrations are at or above action levels in  
24 Permit Part 4, Section 4.6.3.2 for disposal room VOC monitoring data, or the action levels  
25 specified in Permit Part 4, Section 4.6.2.3 for repository monitoring data. If the EDD indicates  
26 that VOC concentrations are at or above these action levels or concentrations, the ~~hard-certified~~  
27 copy data package will be validated within five calendar days as opposed to the 14 calendar day  
28 time frame.

29 Data will be reported as specified in Section N-3(e) and Permit Part 4.

30 Acceptable data for this VOC monitoring plan will meet stated precision and accuracy criteria.  
31 The QA objectives for precision, accuracy, and completeness as shown in Table N-2 can be  
32 achieved when established methods of analyses are used as proposed in this plan and  
33 standard sample matrices are being assessed.

34 N-5e Performance and System Audits

35 The Permittees will evaluate whether the monitoring systems and analytical methods are  
36 functioning properly through performance and system audits. - The assessment period will be

1 determined by the Permittees. System audits will initially address start-up functions for each  
2 phase of the project. These audits will consist of on-site evaluation of materials and equipment,  
3 review of certifications for canisters and measurement and test equipment, review of laboratory  
4 qualification and operation and, at the request of the QA officer, an on-site audit of the  
5 laboratory facilities. The function of the system audit is to verify that the requirements in this  
6 plan have been met prior to initiating the program. System audits will be performed at or shortly  
7 after the initiation of the VOC monitoring programs and on an annual basis thereafter.

8 Performance audits will be accomplished as necessary through the evaluation of analytical QC  
9 data by performing periodic site audits throughout the duration of the project, and through the  
10 introduction of third-party audit cylinders (laboratory blinds) into the analytical sampling stream.  
11 Performance audits will also include a surveillance/review of data associated with canister  
12 certifications and measurement and test equipment, a project-specific technical audit of field  
13 operations, and a laboratory performance audit. Field logs, logbooks, and data sheets, as  
14 applicable will be reviewed during data validation. Blind-audit canisters will be introduced once  
15 during the sampling period. Details concerning scheduling, personnel, and data quality  
16 evaluation are addressed in the QAPjP.

17 By May 1, 2016 the Permittees shall develop and implement a RVMP Laboratory Performance  
18 Evaluation Plan (LPEP) that has been reviewed and approved by the Secretary prior to use, for  
19 Repository VOC ambient monitoring. In addition to the timely submittal of validated data  
20 packages under this LPEP to the Secretary, the results shall also be reported annually in the  
21 October Semi- Annual VOC Monitoring Report. The second contract laboratory performing the  
22 performance evaluation to be used for comparison to the primary contract laboratory shall use  
23 the required MRLs as required in Table N-2, which are defined to be equivalent to the CRQLs.  
24 Any contract laboratory involved in this program shall have a site specific quality assurance  
25 project plan and an associated QA/QC program that are acceptable and aligned with EPA  
26 guidance. The LPEP shall, at a minimum, include the following sections:

- 27 1. Table of Contents
- 28 2. Introduction
- 29 3. Background
- 30 4. Scope/Objectives: this section shall include comparative testing of subatmospheric  
31 sampling containers, the field background canisters, and a test of the cleanliness of the  
32 canister less than the SIM mode MRL in Table N-2.
- 33 5. Laboratory Specific SOPs
- 34 6. Sampling Methodologies
- 35 7. Analytical Methodologies
- 36 8. Quality Assurance Requirements
- 37 9. Schedules
- 38 10. Reporting: data packages shall contain all applicable sections found in the document  
39 "Statement-of-Work for the Analysis of Air Toxics from Superfund Sites" (EPA 1990),  
40 Exhibit B, Section 2, "Reporting Requirements and Order of Data Deliverables" and as  
41 approved by the Secretary.



1 As an alternative to the LPEP, the Permittees will notify the Secretary of their intention to require  
2 the contract laboratory to participate in proficiency testing. The Permittees will then, within 90  
3 days, submit to the NMED for approval, a proposal for proficiency testing. If the Permittees are  
4 unable to develop a proficiency testing plan that is acceptable to the NMED, then the Permittees  
5 will prepare and submit the LPEP. ~~The Permittees have implemented a proficiency testing (PT)~~  
6 ~~plan.~~ The ~~proposal for proficiency testing will~~PT plan includes the following, as applicable:

- 7 • Specific analytical method(s).
- 8 • Schedule for proficiency testing implementation, ~~and~~
- 9 • Provision for the periodic reporting of proficiency testing results and corrective actions, if  
10 any.

11 Results of ~~proficiency testing PT~~ will be reported in the Semi-Annual VOC Monitoring Report as  
12 specified in Permit Part 4, Section 4.6.2.2.

#### 13 N-5f Preventive Maintenance

14 Maintenance of sample collection units is described briefly in Section N-4d Maintenance of  
15 analytical equipment will be addressed in the analytical laboratory SOP.

#### 16 N-5g Corrective Actions

17 If the required completeness of valid data (95 percent) is not maintained, corrective action may  
18 be required. Corrective action for field ~~sampling~~ activities may include recertification and  
19 cleaning of sample collection units, reanalysis of samples, additional training of personnel,  
20 modification to field and laboratory procedures, and recalibration of measurement and test  
21 equipment.

22 Laboratory corrective actions may be required to maintain data quality. The laboratory  
23 continuing calibration criteria indicate the relative response factor for the midpoint standard will  
24 be less than 30 percent different from the mean relative response factor for the initial calibration.  
25 Differences greater than 30 percent will require recalibration of the instrument before samples  
26 can be analyzed. If the internal standard areas in a sample change by more than 40 percent,  
27 the sample will be reanalyzed. If the 40 percent criterion is not achieved during the reanalysis,  
28 the instrument will undergo a performance check and the midpoint standard will be reanalyzed  
29 to verify proper operation. Deviations larger than 40 percent may indicate instrument  
30 malfunction.

31 The laboratory results for samples, duplicate analyses, LCSs, and blanks should routinely be  
32 within the QC limits. If results exceed control limits, the reason for the nonconformances and  
33 appropriate corrective action must be identified and implemented.

#### 34 N-5h Records Management

35 The VOC ~~Monitoring Programs~~ ~~monitoring programs~~ will require administration of record files  
36 (both laboratory and field data collection files). The records control systems will provide  
37 adequate control and retention for program-related information. Records administration,

1 including QA records, will be conducted in accordance with applicable DOE, MOC, and WIPP  
2 Project requirements.

3 Unless otherwise specified, VOC monitoring plan records will be retained as lifetime records.  
4 Temporary and permanent storage of QA records will occur in facilities that prevent damage  
5 from temperature, fire, moisture, pressure, excessive light, and electromagnetic fields. Access  
6 to stored VOC Monitoring Program QA Records will be controlled and documented to prevent  
7 unauthorized use or alteration of completed records.

8 Revisions to completed records (i.e., as a result of audits or data validation procedures) may be  
9 made only with the approval of the responsible program manager and in accordance with  
10 applicable QA procedures. Records of project activities will be maintained at the WIPP site.  
11 Documentation will be available for inspection by internal and external auditors.

#### 12 ~~N-6—Sampling and Analysis Procedures for Disposal Room VOC Monitoring in Filled Panels~~

13 ~~Disposal room VOC samples in filled panels will be collected using the subatmospheric~~  
14 ~~pressure grab sampling technique described in Compendium Method TO-15 (EPA, 1999). This~~  
15 ~~method uses an evacuated passivated canister (or equivalent) that is under vacuum (0.05 mm~~  
16 ~~Hg) to draw the air sample from the sample lines into the canister. The sample lines will be~~  
17 ~~purged prior to sampling to ensure that a representative sample is collected. The passivation of~~  
18 ~~tubing and canisters used for VOC sampling effectively seals the inner walls and prevents~~  
19 ~~compounds from being retained on the surfaces of the equipment. By the end of each sampling~~  
20 ~~period, the canisters will be near atmospheric pressure.~~

21 ~~The analytical procedures for disposal room VOC monitoring in filled panels are the same as~~  
22 ~~specified in Section N-4e.~~

#### 23 N-76 References

24 40 CFR Part 136, "*Guidelines Establishing Test Procedures for the Analysis of Pollutants.*"

25 Section 310 of Public Law 108-447 of the *Consolidated Appropriations Act of 2005.*

26 U.S. Environmental Protection Agency, 1991.- Contract Laboratory Program, *Volatile Organics*  
27 *Analysis of Ambient Air in Canisters (Draft)*, EPA540/R-94-085, December 1991, Washington,  
28 D.C.

29 ~~U.S. Environmental Protection Agency. 1996. SW-846, *Test Methods for Evaluating Solid*~~  
30 ~~*Waste, Physical/Chemical Methods*. Third Edition. Office of Solid Waste and Emergency~~  
31 ~~*Response, Washington, D.C.*~~

32 U.S. Environmental Protection Agency. 1999 *Compendium Method TO-15: Determination of*  
33 *Volatile Organic Compounds (VOCs) In Air Collected in Specially-Prepared Canisters and*  
34 *Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS)*, EPA 625/R-96/010b. Center  
35 for Environmental Research Information, Office of Research and Development, Cincinnati, OH,  
36 January 1999.

37 U.S. Environmental Protection Agency. 2001. *EPA Requirements for Quality Assurance Project*  
38 *Plans, QA/R-5*, EPA 240/B-01/003, March 2001, Washington, D.C.

- 1 U.S. Environmental Protection Agency. 2002. *Guidance for Quality Assurance Project Plans*,
- 2 QA/G-5, EPA 240/R-02/009, December 2002, Washington, D.C.
  
- 3 U.S. Environmental Protection Agency. 2015. *SW-846, Test Methods for Evaluating Solid*
- 4 *Waste, Physical/Chemical Methods*. Office of Solid Waste and Emergency Response,
- 5 Washington, D.C.
  
- 6 Washington Regulatory and Environmental Services, 2003. *Technical Evaluation Report for*
- 7 *WIPP Room-Based VOC Monitoring*.

1

2

## TABLES

3

1  
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3

**Table N-1  
 Target Analytes and Methods for Repository VOC (Station VOC-C and VOC-D)  
 Monitoring and Disposal ~~VOC~~ Room VOC Monitoring**

Target Analyte	EPA Standard Analytical Method
Carbon tetrachloride	EPA TO-15 <sup>a</sup> EPA 8260 <sup>B</sup> <sup>b</sup>
Chlorobenzene	
Chloroform	
1,1-Dichloroethylene	
1,2-Dichloroethane	
Methylene chloride	
1,1,2,2-Tetrachloroethane	
Toluene	
1,1,1-Trichloroethane	
Trichloroethylene	

<sup>a</sup> U.S. Environmental Protection Agency, 1999, Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air- Second Edition, <http://www.epa.gov/ttn/amtic/airtox.html>

<sup>b</sup> U.S. Environmental Protection Agency, SW-846 Test Methods for Evaluation Solid Wastes, Chemical and Physical Methods, **Error! Hyperlink reference not valid.** <https://www.epa.gov/hw-sw846/sw-846-compendium>

4

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**Table N-2  
 Quality Assurance Objectives for Accuracy, Precision, Sensitivity, and Completeness**

Target Analyte	Accuracy (Percent Recovery)	Precision (RPD)		Required Repository Surface Monitoring MRL for SCAN Mode (ppbv)	Required Repository Surface Monitoring MRL for SIM Mode (ppbv)	Required Disposal Room MRL (ppbv)	Complete- ness (Percent)
		Laboratory	Field				
Carbon tetrachloride	60 to 140	25	35	0.2	0.1	500	95
Chlorobenzene	60 to 140	25	35	0.2	0.1	500	95
Chloroform	60 to 140	25	35	0.2	0.1	500	95
1,1-Dichloroethylene	60 to 140	25	35	0.2	0.1	500	95
1,2-Dichloroethane	60 to 140	25	35	0.2	0.1	500	95
Methylene chloride	60 to 140	25	35	0.2	0.1	500	95
1,1,2,2- Tetrachloroethane	60 to 140	25	35	0.2	0.1	500	95
Toluene	60 to 140	25	35	0.2	0.1	500	95
1,1,1- Trichloroethane	60 to 140	25	35	0.2	0.1	500	95
Trichloroethylene	60 to 140	25	35	0.2	0.1	500	95

MRL maximum method reporting limit for undiluted samples

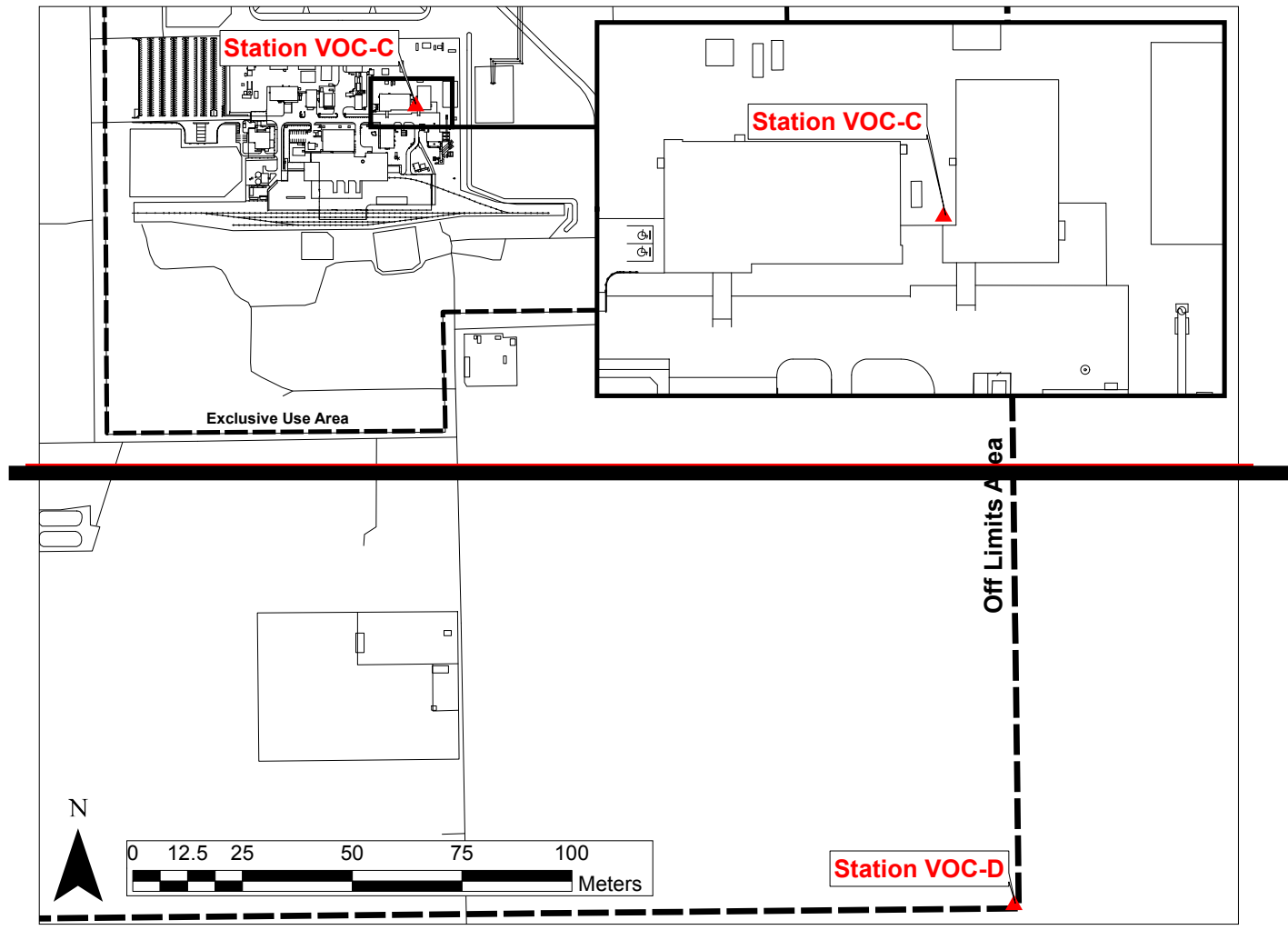
RPD relative percent difference

3

1

## **FIGURES**

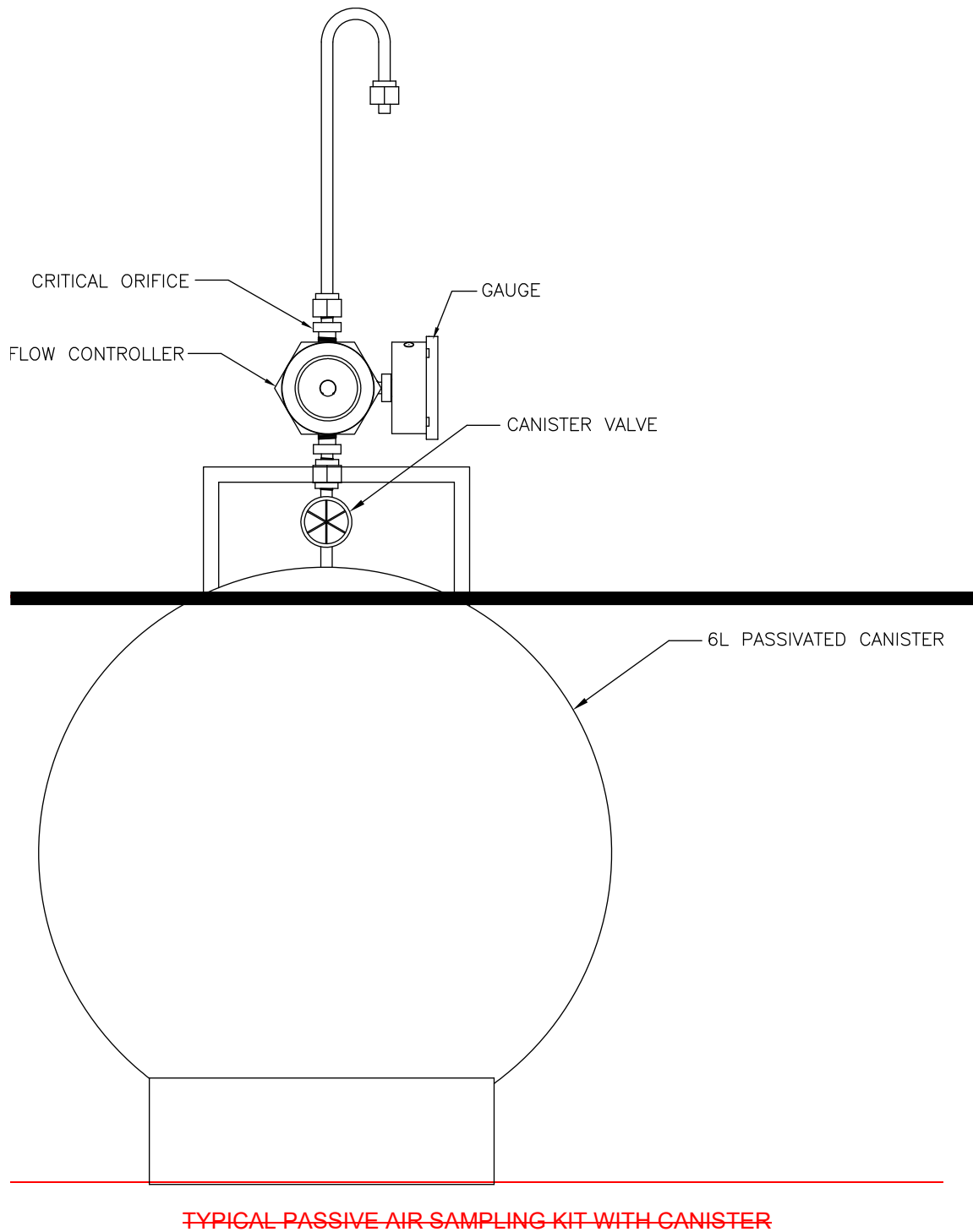
2



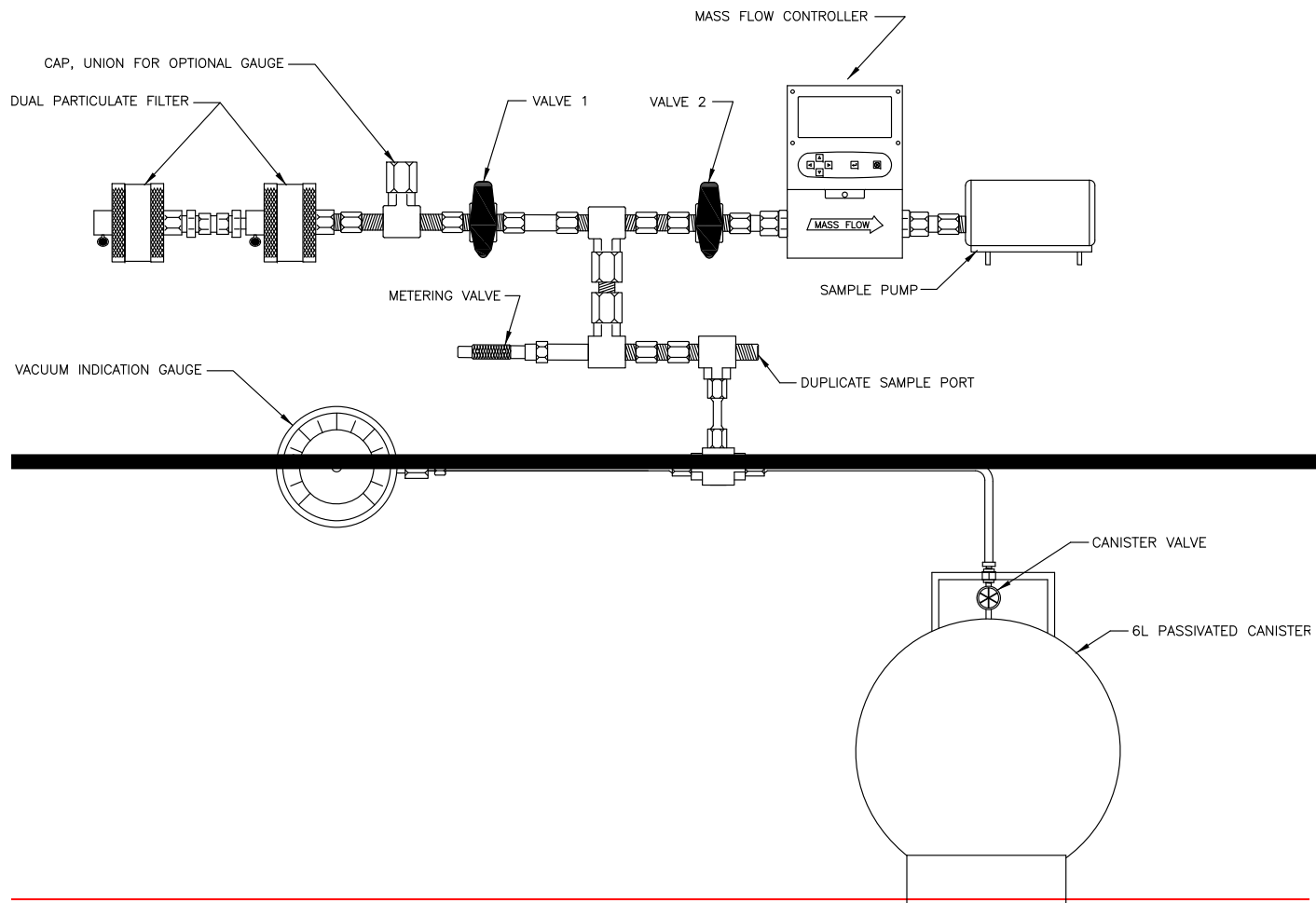
(see Figure D-1 and Figure D-1a for a detailed map and legend of the surface buildings)

**Figure N-1**  
**Repository VOC Monitoring Locations**



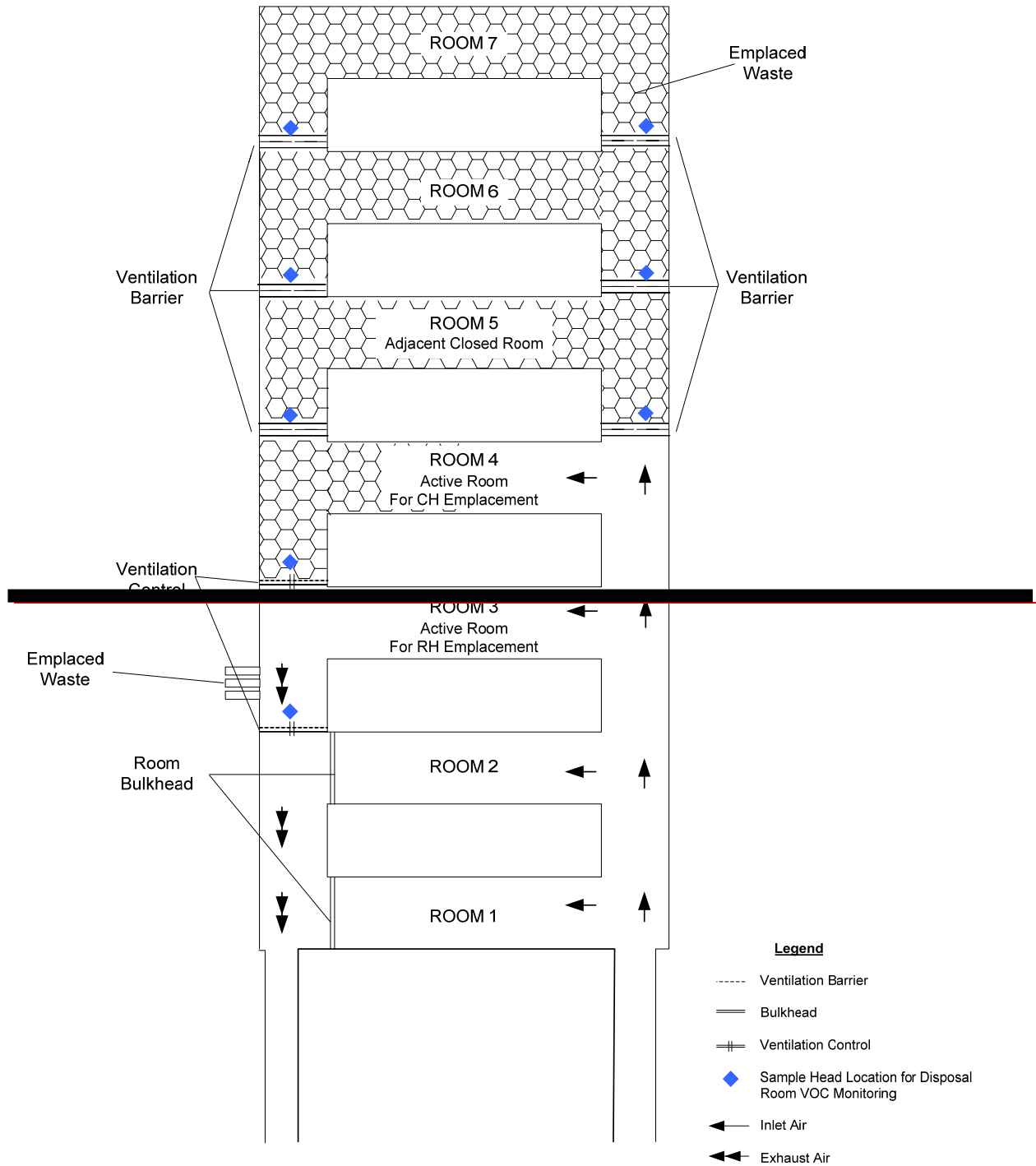


**Figure N-2**  
**VOC Monitoring System Design**

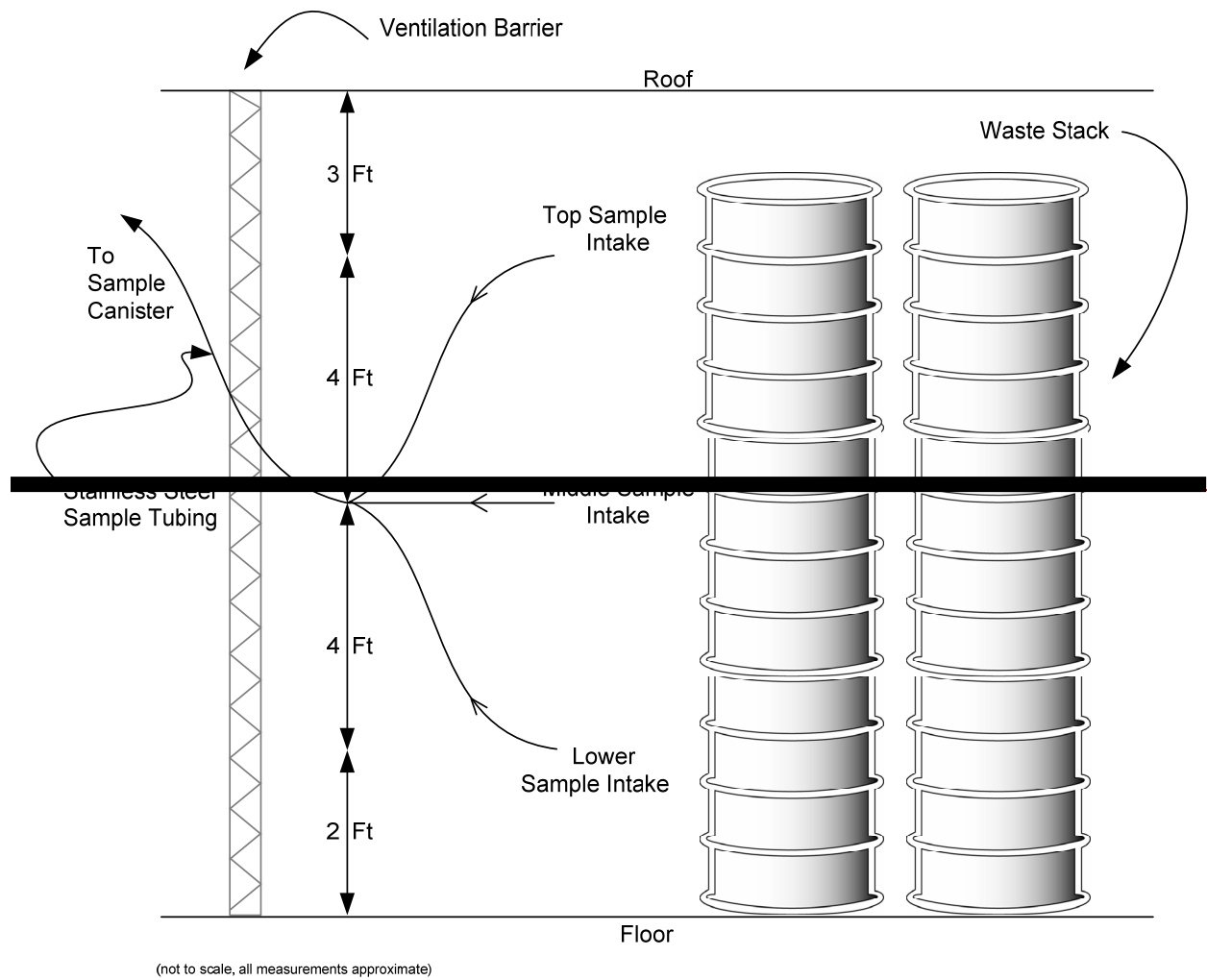


TYPICAL SUBATMOSPHERIC SAMPLING ASSEMBLY WITH CANISTER

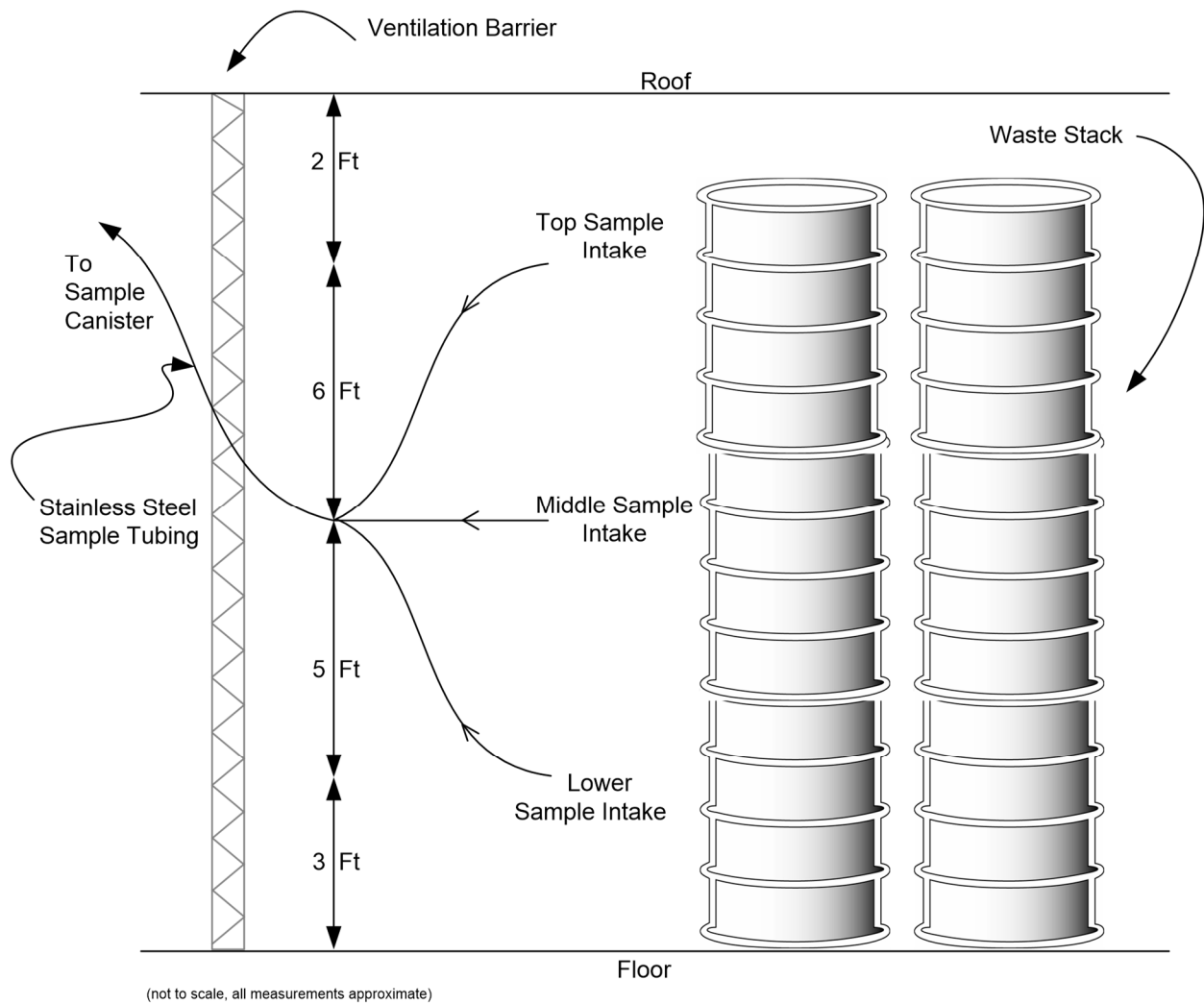
Figure N-2  
VOC Monitoring System Design (continued)



**Figure N-3**  
**Typical Disposal Room VOC Monitoring Locations**



**Figure N-4a**  
**Disposal Room Sample Head Arrangement for Panels 1-7**



**Figure N-4b**  
**Disposal Room Sample Head Arrangement for Panel 8**

**ATTACHMENT O**  
**WIPP MINE VENTILATION RATE MONITORING PLAN**

## ATTACHMENT O

### WIPP MINE VENTILATION RATE MONITORING PLAN

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3	<u>Table</u> O-1	Mine Ventilation Rate Testing Equipment



## ATTACHMENT O

### WIPP MINE VENTILATION RATE MONITORING PLAN

#### O-1 Definitions

Compliance with the mine ventilation requirements set forth in Permit Part 4 and Permit Attachment A2 requires the use and definition of the following terms:

**Actual cubic feet per minute (acfm):** The volume of air passing a fixed point in an excavation, normally determined as the product of the cross section of the excavation and the mean velocity of the air.

**Standard cubic feet per minute (scfm):** The actual cubic feet per minute passing a fixed point adjusted to standard conditions. In the Imperial measurement system, the standard condition for pressure is 14.7 pounds per square inch (**psi**) (sea level) and the standard condition for temperature is 492 degrees Rankine (freezing point of water or 32 degrees Fahrenheit). The greatest difference between acfm and scfm occurs in the summer when the pressure at the repository horizon is about 14.2 psi and the temperature is about 560 degrees Rankine (100 degrees Fahrenheit). Then

$$1 \text{ scfm} \times (560/492) \times (14.7/14.2) = 1.2 \text{ acfm}$$

A reasonably conservative conversion factor, therefore, is 1.2. Using this factor, 35,000 scfm is very nearly 35,000 x 1.2 or 42,000 acfm.

**Restricted Access:** If the required ventilation rate in an active disposal room when waste disposal is taking place cannot be achieved or cannot be supported due to operational needs, access is restricted by the use of barriers, signs and postings, or individuals stationed at the entrance to the active disposal room when ventilation rates are below 35,000 scfm unless measures as described in Section O-3b(1) are implemented. Note: As provided in Section O-3b(2) entry to restricted access active rooms for the purpose of establishing normal ventilation is allowed.

**Shift:** Those work shifts when there is normal access to the Waste Isolation Pilot Plant (**WIPP**) underground.

**Worker:** Anyone who has ~~normal~~unescorted access to the WIPP underground.

#### O-2 Objective

The objective of this plan is to describe how the ventilation requirements in the Permit will be met. This plan achieves this objective and documents the process by which the Permittees demonstrate compliance with the ventilation requirements by:

- Maintaining a minimum of 35,000 scfm of air through the active rooms when waste disposal is taking place and when workers are present in the rooms

- If an active room ventilation rate of 35,000 scfm cannot be met, actions as described in Section O-3b(1) shall be taken during waste disposal operations when workers are present.

~~This plan contains the following elements: Objective; Design and Procedures; Equipment Calibration and Maintenance; Reporting and Record Keeping; Quality Assurance.~~

### O-3 Design and Procedures

This section describes the three basic processes that make up the mine ventilation rate monitoring plan:

- Test and Balance, a periodic re-verification of the satisfactory performance of the entire underground ventilation system and associated components
- Monitoring of active disposal room(s) to ensure a minimum flow of 35,000 scfm whenever waste disposal is taking place and workers are present in the room
- If an active disposal room ventilation rate of 35,000 scfm cannot be met, actions as described in Section O-3b(1) shall be taken during waste disposal operations when workers are present.

#### O-3a Test and Balance

##### O-3a(1) Test and Balance Process

The WIPP underground ventilation system and the underground ventilation modes of operation are described in Permit Attachment A2, Section A2-2a(3). The Permittees shall verify underground ventilation system performance by conducting a periodic Test and Balance. The Test and Balance is a comprehensive series of measurements and adjustments designed to ensure that the system is operating within acceptable design parameters. The Test and Balance is an appropriate method of verifying system flow because it provides consistent results based on good engineering practices. The testing of underground ventilation systems is described in McPherson, ~~2009~~1993. Once completed, the Test and Balance data become the baseline for underground ventilation system operation until the next Test and Balance is performed.

The “Test” portion of the process shall involve measuring the pressure drop and air quantity of every underground entry excluding alcoves or other dead end drifts. In addition, the tests shall verify resistance curves for each of the main regulators, measure shaft resistance, and measure main fan pressure and quantity. This is done at the highest achievable airflow to facilitate accurate measurements. From these measurements the frictional resistance of the system is determined.

Pressure shall be measured using the gage and tube method, which measures the pressure drop between two points using a calibrated pressure recording device and pitot tubes. Pressure drops across the shafts shall be measured by either calibrated barometers at the top and bottom of shafts or the gage and tube method. Airflow shall be measured using a calibrated ~~vane~~-anemometer to take a full entry traverse between system junctions. Fan pressure shall be measured using a calibrated pressure recording device and pitot tube to determine both static and velocity pressure components.

1 Multiple measurements shall be taken at each field location to ensure accurate results.  
2 Consecutive field values must fall within  $\pm 5\%$  to be acceptable. These data shall be verified  
3 during the testing process by checking that:

- 4 • the sum of airflows entering and leaving a junction is equal to zero; and,
- 5 • the sum of pressure drops around any closed loop is equal to zero.

6 Once the measurements are taken, data shall be used to calculate the resistance of every  
7 underground drift, as well as shafts and regulators using Atkinson's Square Law

$$8 \quad P = R \times Q^2$$

9 where the pressure drop of an entry (P) is equal to a resistance (R) times the square of the  
10 quantity of air flowing (Q) through the circuit.

11 The "Balance" portion of the process shall involve adjusting the settings of the system fans and  
12 regulators to achieve the desired airflow distribution in all parts of the facility for each mode of  
13 operation. The system baseline settings for the current Balance shall be established from the  
14 previous Test and Balance. Adjustments shall then be made to account for changes in system  
15 resistance due to excavation, convergence due to salt creep, approved system modifications, or  
16 operational changes.

17 The Permittees shall use ~~a commercially available~~ an appropriate ventilation simulator to  
18 process Test and Balance field data. The simulator uses the Hardy-Cross Iteration Method  
19 (McPherson, ~~2009~~ 1993) to reduce field data into a balanced ventilation network, including the  
20 appropriate regulator settings necessary to achieve proper airflow distribution for the various  
21 operating modes. Once balanced, the same simulator shall be used to evaluate changes such  
22 as future repository development and potential system modification before they are  
23 implemented.

24 The Test and Balance process culminates in a final report which is retained on site. Following  
25 receipt of the Test and Balance Report, the Permittees shall revise the WIPP surface and  
26 underground ventilation system procedures to incorporate any required changes to the  
27 ventilation system configuration. The Test and Balance data shall be used to adjust the  
28 operating range of fan controls, waste tower pressure, auxiliary air intake tunnel regulator  
29 settings, underground regulator settings, and door configurations. The model data and  
30 procedure changes shall be used to establish normal configuration settings to achieve the  
31 desired airflow in the underground. These settings shall then be modified by operations  
32 personnel throughout the year to compensate for system fluctuations caused by seasonal  
33 changes in psychrometric properties, and to meet specific operational needs. This ensures that  
34 the facility is operated at the design airflow rate for each ventilation mode.

### 35 O-3a(2) Test and Balance Schedule

36 The Test and Balance is generally conducted on a 12- to 18-month interval, but in no case shall  
37 the interval between consecutive Test and Balance performances exceed 18 months. This  
38 interval is sufficient to account for changes in the mine configuration since over this period the  
39 ventilated volume changes very little. ~~The quality and maintenance of ventilation control~~  
40 ~~structures (e.g., bulkheads) is excellent, so leakage is small and relatively~~

1 ~~constant.~~Maintenance of ventilation control structures (e.g., bulkheads) occurs periodically to  
2 ensure the ventilation structure performs as expected. Historic test and balance results confirm  
3 that changes between test and balances fall within anticipated values.

4 O-3b Active Room Minimum Airflow

5 O-3b(1) Verification of Active Room Minimum Airflow

6 Whenever workers are present, the Permittees shall verify the minimum airflow through active  
7 room(s) when waste disposal is taking place of 35,000 scfm at the start of each shift, any time  
8 there is an operational mode change, or if there is a change in the ventilation system  
9 configuration. If an active room ventilation rate of 35,000 scfm cannot be met, measures such  
10 as those described below shall be taken during waste disposal operations when workers are  
11 present.

12 Measures to allow waste emplacement in an active room when, under abnormal conditions,  
13 35,000 scfm cannot be achieved will be prescribed in standard operating procedure(s) (SOPs)  
14 described in Section O-5c. These measures may include, but are not limited to, the following:  
15 the adjustment of the volatile organic compound (**VOC**) immediately dangerous to life or health  
16 (**IDLH**)-based action levels in ~~the~~ Permit Part 4, Section 4.6.3.2 (these adjustments are directly  
17 proportional to the actual flow rate that is less than 35,000 scfm); or the use of personal  
18 protective equipment (**PPE**) as described in Occupational Safety and Health Administration  
19 (**OSHA**) Standard 29 CFR Code of Federal Regulations (CFR) 1910.134.

20 Implementing measures taken at the WIPP facility regarding the 35,000 scfm ventilation rate  
21 and associated details (i.e., date, start time, end time, and reason) will be recorded in the  
22 Central Monitoring Room Operator's (**CMRO**) Log and reported to the New Mexico Environment  
23 Department (**NMED**) as required by Section O-5a.

24 O-3b(2) Measurement and Calculation of the Active Disposal Room Airflow

25 The Permittees shall measure the airflow rate and use the disposal room cross-sectional area to  
26 calculate the volume of air flowing through a disposal room. The measurement of airflow shall  
27 use a calibrated anemometer and a moving traverse (McPherson, 20091993). Airflow  
28 measurements shall be collected at an appropriate location, chosen by the operator to minimize  
29 airflow disturbances, near the entrance of each active disposal room. The excavation  
30 dimensions at the measurement location are taken and the cross-sectional area is calculated.  
31 The flow rate is the product of the air velocity and the cross-section area. The value shall be  
32 entered on a log sheet and compared to the required minimum. The format and content of the  
33 log sheet may vary, but will always contain the following data and information as applicable:

- 34 • Date
- 35 • Time
- 36 • Ventilation flow rate reading
- 37 • If the required minimum ventilation rate was achieved
- 38 • If the room was restricted

- 1       • If Section O-3b(1) measures will be implemented (implementing procedure and revision
- 2       number, if applicable)
  
- 3       • The reason for waste emplacement under 35,000 scfm ventilation rate, if applicable
  
- 4       • Signature

5 Working values are in acfm and the conversion to scfm is described in Section O-1 above.  
6 Measurements shall be collected, recorded, and verified by qualified operators.

7 The operator shall compare the recorded acfm value with the minimum acfm value provided at  
8 the top of the log sheet. During waste disposal operations, the airflow shall be re-checked and  
9 recorded whenever there is an operational mode change or a change in ventilation system  
10 configuration. Once the ventilation rate has been recorded and verified to be at least the  
11 required minimum, personnel access to the room is unrestricted in accordance with normal  
12 underground operating procedures. If the required ventilation rate cannot be achieved, or  
13 cannot be supported due to operational needs, access to the room shall be restricted. Those  
14 periods when active disposal room access is restricted shall be documented on the log sheet for  
15 that active disposal room. Entry to restricted access active rooms for the purpose of establishing  
16 normal ventilation or for emplacing waste under the conditions identified in Section O-3b(1) is  
17 allowed. Such entry shall be documented on the log sheet including a reference to the SOP  
18 used.

#### 19 O-4 Equipment Calibration and Maintenance

20 The list of equipment used to conduct the Test and Balance and to determine the airflow  
21 through the active disposal room(s) is provided in Table O-1.

22 ~~Equipment used for the periodic Test and Balance, and daily verification of active disposal room~~  
23 ~~flow rate~~ shall be calibrated, as appropriate, in accordance with ~~appropriate~~ WIPP facility  
24 calibration and data collection procedures. Work performed by subcontractors shall also be  
25 calibrated to an equivalent standard. Equipment shall be inspected before each use to ensure  
26 that it is functioning properly and that the equipment calibration is current. Maintenance of  
27 equipment shall be completed by qualified individuals or by qualified off-site service vendors.

28 ~~Equipment used to conduct the Test and Balance, and to determine the airflow through the~~  
29 ~~active disposal room(s) are provided in Table O-1.~~

#### 30 O-5 Reporting and Recordkeeping

##### 31 O-5a Reporting

32 The Permittees shall submit an annual report to NMED presenting the results of the data and  
33 analysis of the Mine Ventilation Rate Monitoring Plan. In the years that the Test and Balance is  
34 performed, the Permittees will provide a summary of the results in the annual report.

35 The Permittees shall evaluate compliance with the minimum ventilation rate for an active room  
36 specified in Permit Part 4, Section 4.5.3.2 on a monthly basis. The Permittees shall report to the  
37 Secretary in the annual report specified in Permit Part 4, Section 4.6.4.2 whenever the  
38 evaluation of the mine ventilation monitoring program data identifies that the ventilation rate

1 specified in Permit Part 4, Section 4.5.3.2 has not been achieved. The Permittees will identify  
2 the implementing measures as described in Section O-3b(1) used to allow waste handling  
3 activities to proceed when the 35,000 scfm ventilation rate is not achieved. These implementing  
4 measures and associated details (i.e., date, start time, end time, and reason) will be reported to  
5 NMED in the annual Mine Ventilation Rate Monitoring Report required by this section.

6 The Permittees shall also notify NMED by e-mail within 15 calendar days of commencement of  
7 waste emplacement operations taking place below 35,000 scfm. The notification shall include  
8 the date, start time, end time, reason and implementing measure taken, as applicable. If the  
9 Permittees have not completed the waste emplacement activity by the time of this notification, a  
10 follow-up e-mail shall be provided within 15 calendar days to notify NMED of the end of the  
11 waste emplacement activity and other relevant information not previously provided.

#### 12 O-5b Recordkeeping

13 The Permittees shall retain the following information in the Operating Record:

- 14 • The CMRO Log documenting the ventilation system operating mode.
- 15 • Active disposal room log sheet documenting the ventilation flow rate readings and  
16 applicable information listed in Section O-3b(2).

17 These records will be maintained in the facility Operating Record until closure of the WIPP  
18 facility.

#### 19 O-5c Standard Operating Procedure Applicable to Abnormal Operating Conditions for 20 Active Room Ventilation Flow Rate

21 The abnormal operating conditions procedure provides instructions necessary to evaluate VOC  
22 concentrations in an adjacent filled room prior to commencing waste emplacement operations in  
23 an active disposal room when workers are present at a reduced active room ventilation flow  
24 rate. Abnormal conditions that may prevent 35,000 scfm from being met, may include, but are  
25 not limited to, barometric pressure changes, maintenance activities, and equipment  
26 malfunctions. VOC data in the adjacent filled room are collected and analyzed in accordance  
27 with Permit Part 4, Section 4.6.3. Adjusted VOC action levels are prescribed at a maximum of  
28 5,000 scfm increments (e.g., 30,000 scfm, 25,000 scfm, 20,000 scfm, 15,000 scfm, and 10,000  
29 scfm) to provide a means of assessment. When the measured flow rates falls between the  
30 increment values in the SOP, the lower flow rate is used for determining the adjusted VOC  
31 action level. The validated VOC monitoring data are compared to the action levels prescribed in  
32 the standard operating procedure and a decision flow path is provided to the Facility Shift  
33 Manager, or designee, to determine applicable actions.

34 These actions include, but are not limited to, commencing waste emplacement operations at a  
35 reduced active room ventilation flow rate based on the adjusted VOC action levels, commencing  
36 waste emplacement operations at a reduced active room ventilation flow rate with the use of  
37 PPE as described in OSHA standard 29 CFR 1910.134, or restricting access to the active  
38 disposal room until the ventilation flow rate requirements of Permit Part 4, Section 4.5.3.2, are  
39 met. As stated in the abnormal operating conditions procedure, implementing measures taken  
40 at the WIPP facility are recorded in the CMRO Log and reported to NMED as required by  
41 Section O-5a.

1 O-6 Quality Assurance

2 Quality assurance associated with the Mine Ventilation Rate Monitoring Plan shall comply with  
3 the requirements of the WIPP Quality Assurance Program Description (**QAPD**). The Permittees  
4 shall verify the qualification of personnel conducting ventilation flow measurements. The  
5 instrumentation used for monitoring active disposal rooms shall be calibrated in accordance with  
6 the applicable provisions of the WIPP procedures. The ventilation simulation software programs  
7 shall be controlled in accordance with the WIPP QAPD and WIPP computer software quality  
8 assurance plans.

9 Data generated by this plan, as well as records, and procedures to support this plan shall be  
10 maintained and managed in accordance with the WIPP QAPD. Nonconformance or conditions  
11 adverse to quality as identified in performance of this plan will be addressed and corrected as  
12 necessary in accordance with applicable WIPP Quality Assurance procedures.

13 O-7 References

14 McPherson, Malcolm J. 2009. *Subsurface Ventilation Engineering*. 2nd. Fresno, California: Mine  
15 Ventilation Services Inc.~~McPherson, M. J., 1993. *Subsurface Ventilation and Environmental*~~  
16 ~~*Engineering*, Chapman & Hall, London, First Edition.~~

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## TABLES

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2

**Table O-1  
 Mine Ventilation Rate Testing Equipment**

Equipment Used to Conduct Test	Ventilation Test Performed	
	Test and Balance	Active Disposal Room(s)
Calibrated Anemometer	X	X
Calibrated Differential Pressure Sensor	X	
Pitot Tubes	X	
Tubing	X	
Temperature Sensing Device	X	
Relative Humidity Sensor	X	
Calibrated Barometers	X	
Electronic Manometer	X	

3