Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

May 29, 2025

Mr. JohnDavid Nance, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87508-6303

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

Dear Mr. Nance:

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

- Update Permit Attachment D, Table D-1. *Resource Conservation and Recovery Act Emergency Coordinators*
- Update Permit Attachment D, Section D-7, *Emergency Response Agreements* and D-9, Location of the *RCRA Contingency Plan* and Plan Revision

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

Sincerely,

MARK BOLLINGER
Digitally signed by MARK BOLLINGER
Date: 2025.05.29 09:22:52 -06'00'

Mark Bollinger
Manager
Carlsbad Field Office

KENNETH HARRAWOOD (Affiliate)
Digitally signed by KENNETH HARRAWOOD (Affiliate)
Date: 2025.05.28 15:48:11 -06'00'

Ken Harrawood
Program Manager
Salado Isolation Mining Contractors, LLC

Enclosure

CBFO:ERCD:MG:RS:25-0369

250519

cc: w/enclosure

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*ED denotes electronic distribution

Class 1 Permit Modification Notifications

1. **Update Permit Attachment D, Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators***
2. **Update Permit Attachment D, Sections D-7, *Emergency Response Agreements* and D-9, Location of the *RCRA Contingency Plan* and Plan Revision**

Waste Isolation Pilot Plant
Carlsbad, New Mexico

WIPP Permit Number - NM4890139088-TSDF

May 2025

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Acronyms and Abbreviations

BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
DOI	U.S. Department of Interior
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
MOU	Memorandum of Understanding
Permit	Waste Isolation Pilot Plant Hazardous Waste Facility Permit
Permittees	U.S. Department of Energy and Salado Isolation Mining Contractors LLC
PMN	Permit Modification Notification
RCRA	Resource Conservation and Recovery Act
WIPP	Waste Isolation Pilot Plant

Overview of the Permit Modification Notification

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

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

The requested modifications to the Permit and any related supporting documents are provided in this PMN. The proposed modifications to the text of the Permit have been identified using red text and double underline and a ~~strikeout~~ font for deleted information.

Attachment A
Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Item No.	Affected Permit Section	Change Description	Category
1	Attachment D, Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators*	This modification updates the Emergency Coordinators list to reflect the addition of two new RCRA Emergency Coordinators at the WIPP facility.	B.6.d
2	Attachment D, Section D-7, *Emergency Response Agreements,* and Section D-9, Location of the *RCRA Contingency Plan* and Plan Revision	This modification updates Permit text to include the University Medical Center of El Paso, as a facility for the treatment of persons with radiological contamination.	A.1

Item 1

Description

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

- Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators*
  - Add T.K. (Taren) Wright, (575) 234-8276
  - Add E.T. (Eric) Galindo, (575) 234-8276

Basis

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

Discussion

This change is needed to update the list of persons qualified to act as the RCRA Emergency Coordinator and to ensure the respective information is accurate and current. This list must be kept up to date pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.52(d)). The Permittees are adding T.K. (Taren) Wright and E.T (Eric) Galindo to the list of RCRA Emergency Coordinators.

Revised Permit Text:

Table D-1
Resource Conservation and Recovery Act Emergency Coordinators[1]

Name	Address*	Office Phone	Personal Phone*	24-Hour Emergency Phone
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
J.W. (Justin) Bailey		(575) 234-8276		(575) 234-8111
J.N. (Jacob) Galindo		(575) 234-8276		(575) 234-8111
D.W. (Devlin) Willingham		(575) 234-8276		(575) 234-8111
S.B. (Samuel) Vasquez		(575) 234-8276		(575) 234-8111
C.L. (Cody) Rich		(575) 234-8276		(575) 234-8111
T.B. (Trevor) Dominguez		(575) 234-8276		(575) 234-8111
D.D. (Dario) Corral		(575) 234-8276		(575) 234-8111
T.K. (Taren) Wright		(575) 235-8276		(575) 234-8111
E.T. (Eric) Galindo		(575) 234-8276		(575) 234-8111

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

[1] For every shift, one qualified RCRA Emergency Coordinator serves as the primary, and a second qualified RCRA Emergency Coordinator is available to serve as the alternate.

Item 2

Description

This modification revises text in Permit Attachment D, Section D-7 and Section D-9 to add the preparedness and prevention arrangement with the University Medical Center of El Paso pursuant to Permit Part 2, Section 2.10.5.1. Permit Attachment D is updated with the following changes:

- Permit Attachment D, Section D-7*, Emergency Response Agreements*
  - Revised the fourth bullet, first sentence to add ","; delete "and"; and to add *", and the University Medical Center of El Paso"*.
- Permit Attachment D, *Section D-9*, Location of the *RCRA Contingency Plan* and Plan Revision
  - Added a 17th bullet, to add "University Medical Center of El Paso"

Basis

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

Discussion

This change is needed to update the list of organizations with which the Permittees have emergency response agreements. The Department of Energy (**DOE**) Carlsbad Field Office and the University Medical Center of El Paso (UMC El Paso) entered into a Memorandum of Understanding (**MOU**) to provide for the treatment of persons with radiological contamination who have incurred injuries beyond the treatment capabilities at the WIPP facility.

Revised Permit Text:

D-7 Emergency Response Agreements

The Permittees have established agreements with federal, state, and local emergency response agencies and mining companies in the vicinity of the WIPP facility for firefighting, medical assistance, hazardous materials response, and law enforcement. In the event that on-site response resources are unable to provide the needed response actions during a medical, fire, hazardous materials, or security emergency, the RCRA Emergency Coordinator will notify appropriate emergency response agencies and request assistance. Once on site, emergency response agency personnel will perform emergency response activities under the direction of the Incident Commander.

The agreements with federal, state, and local agencies and mining companies in the vicinity of the WIPP facility for emergency response capabilities are on file at the WIPP facility. Additional agreements may be established when needed. Descriptions of the agreements with federal, state, and local agencies and mining operations in the vicinity of the WIPP facility, as required by 20.4.1.300 NMAC (incorporating 40 CFR §§262.256 and 262.261(c)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.37 and §264.52(c)), include, but is not limited to, the following:

- Agreements with local mining companies, including Intrepid Potash NM LLC, White Marble Mine, and Mosaic Potash Carlsbad Inc. provide for mutual aid and assistance, in the form of MRTs, in the event of a mine disaster or other circumstance at either of the facilities. This provision ensures that the WIPP MOC will have two MRTs available at all times when miners are underground.

- An agreement with the U.S. Department of Interior (**DOI**), represented by the Bureau of Land Management (**BLM**), Roswell District, for wildland firefighting support within the WIPP Land Withdrawal Area.

- Agreements for mutual-aid firefighting with Eddy County, the City of Hobbs, and the City of Carlsbad for assistance, including equipment and personnel.

- Mutual-aid Agreements with the City of Hobbs and the City of Carlsbad for mutual ambulance, medical, rescue, and hazardous material response services; for use of WIPP facility radio frequencies during emergencies; and for mutual security and law enforcement services, within the appropriate jurisdiction limits of each party.

- Agreements with the Covenant Health Hobbs Hospital, ~~and~~ the Carlsbad Medical Center, and the University Medical Center of El Paso for the treatment of persons with radiological contamination who have incurred injuries beyond the treatment capabilities at the WIPP facility. The WIPP facility provides transport of the patient(s) to these facilities.

- Agreements with the Sheriff of Eddy County and the Sheriff of Lea County for mutual law enforcement services support.

- An agreement with the New Mexico Department of Homeland Security and Emergency Management for mutual emergency management support, access to state law enforcement, public works, and transportation assets.

D-9 Location of the RCRA Contingency Plan and Plan Revision

In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §§262 and 262.262(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a)), the owner/operator of the WIPP facility will ensure that copies of this RCRA Contingency Plan are maintained at the WIPP facility and are available to the emergency personnel and organizations described in Section D-2. When the RCRA Contingency Plan is revised, updated copies are distributed (electronically or via site mail) or hand delivered to applicable WIPP facility emergency personnel and Emergency Operations Centers. In addition, the Permittees will make copies available to the following federal, state, and local agencies and mining companies in the vicinity of the WIPP facility, as required by 20.4.1.300 (incorporating 40 CFR §262.262(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.53(b)):

- Intrepid Potash New Mexico LLC
- White Marble Mine
- Mosaic Potash Carlsbad Inc.
- City of Carlsbad
- Carlsbad Medical Center, Carlsbad
- Covenant Health Hobbs Hospital, Hobbs
- City of Hobbs
- BLM, Carlsbad
- New Mexico State Police
- New Mexico Department of Homeland Security and Emergency Management
- Eddy County Commission
- Sheriff of Eddy County
- Sheriff of Lea County
- Eddy County Fire and Rescue
- Eddy County Emergency Management
- Lea County Emergency Management
- University Medical Center of El Paso