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

March 12, 2026

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

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

Dear Mr. Nance:

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

- Update Manifest Requirements in Permit Attachment A1 and Permit Attachment C
- Update Procedure Numbers in Permit Attachment E, Table E-1
- Update Location for Emergency Equipment in Permit Attachment D, Table D-2
- Remove Location of Obsolete Equipment in Permit Attachment D, Table D-2
- Update RCRA Emergency Coordinators in Permit Attachment D, Table D-1
- Revise Responsibilities of the Mine Rescue Team in Permit Attachment D
- Add Option for Obtaining Density Measurements in Permit Attachment L

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

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

Sincerely,

MARK BOLLINGER
Digitally signed by MARK BOLLINGER
Date: 2026.03.12 12:29:50 -06'00'

Mark Bollinger
Manager
Carlsbad Field Office

MICHAEL ROCHA (Affiliate)
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Ken Harrawood
Program Manager
Salado Isolation Mining Contractors, LLC

Enclosure

CBFO:ERCD:MG:RS:26-0169

260310

cc: w/enclosure

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*ED denotes electronic distribution

Class 1 Permit Modification Notifications

1. **Update Manifest Requirements in Permit Attachment A1 and Permit Attachment C**
2. **Update Procedure Numbers in Permit Attachment E, Table E-1**
3. **Update Location for Emergency Equipment in Permit Attachment D, Table D-2**
4. **Remove Location of Obsolete Equipment in Permit Attachment D, Table D-2**
5. **Update Permit Attachment D, Table D-1**
6. **Revise Responsibilities of the Mine Rescue Team in Permit Attachment D**
7. **Add Option for Obtaining Density Measurements in Permit Attachment L**

Waste Isolation Pilot Plant
Carlsbad, New Mexico

WIPP Permit Number - NM4890139088-TSDF

March 2026

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
MRT	Mine Rescue Team
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
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 Notifications

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

These PMNs are being submitted by the U.S. Department of Energy (**DOE**) and Salado Isolation Mining Contractors LLC, collectively referred to as the Permittees, in accordance with Permit Part 1, Section 1.3.1 (20.4.1.900 New Mexico Administrative Code (**NMAC**) incorporating Title 40 of the Code of Federal Regulations (**CFR**) §270.42(a)). These PMNs 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 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. All direct quotations are indicated by italicized text.

Attachment A
Description of the Class 1 Permit Modification Notifications

Table 1. Class 1 Hazardous Waste Facility Permit Modification Notifications

Item No.	Affected Permit Section	Change Description	Category
1	Attachment A1, Section A1-1d(2), *CH TRU Mixed Waste Handling* Attachment A1, Section A1-1d(3), *RH TRU Mixed Waste Handling* Attachment C, Section C-5b(1), *Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste Tracking Information*	This modification updates the manifest requirements to be consistent with the changes to 40 CFR §264.72.	A.1
2	Attachment E, Table E-1, *Inspection Schedule/Procedures*	This modification updates the procedure number for patrols and adds a preoperational procedure.	A.1
3	Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*	This modification updates the location of three pieces of emergency equipment in the underground.	B.6.b
4	Attachment D, Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*	The modification removes the location for a fire alarm panel.	A.1
5	Attachment D, Table D-1, *Resource Conservation and Recovery Act Emergency Coordinators*	This modification updates the list of Emergency Coordinators to reflect the addition of two RCRA Emergency Coordinators at the WIPP facility.	B.6.d
6	Attachment D, Section D-2a, *Emergency Response Personnel*	This modification revises the responsibilities for the Mine Rescue Team.	A.1
7	Attachment L, Section L-4c(1), *Groundwater Surface Elevation Monitoring Methodology*	This modification adds the option to use pressure transducers.	A.3

Item 1

Description

This modification updates the manifest requirements to implement recent changes to 40 CFR §264.72 and to remove redundant unresolved manifest discrepancy reporting requirements. Permit Attachment A1 and Permit Attachment C are updated with the following changes:

- Permit Attachment A1, *Container Storage*, Sections A1-1d(2), *CH TRU Mixed Waste Handling*, and A1-1d(3), *RH TRU Mixed Waste Handling*
    - Deleted “Discrepancies that are not resolved within 15 days will be reported to the NMED in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.72)” in three places.
- Permit Attachment C, *Waste Analysis Plan*, Section C-5b(1), *Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste Tracking Information*
    - Replaced “fifteen” with “twenty”
    - Replaced “15” with “20”
    - Deleted “immediately”
    - Replaced “NMED in writing” with “e-manifest system pursuant to 40 CFR §264.72(c)(2)”
    - Deleted “Notifications to the NMED will consist of a letter describing the discrepancies, discrepancy resolution, and a copy of the manifest.
    - Replaced “thirty” with “sixty”
    - Replace “30” with “60”
    - Added “, pursuant to 40 CFR §264.72(d)(1)”

Basis

This change is classified as and “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 Permit text to implement recent changes to 40 CFR §264.72. Manifest discrepancy reporting changes are needed to correspond with changes to the *Resource Conservation and Recovery Act* (**RCRA**) manifest regulations in 40 CFR §264.72. The EPA issued a Final Rule on July 26, 2024 (60692 Federal Register / Vol. 89, No. 144 / Friday, July 26, 2024 / Rules and Regulations) to finalize amendments to the RCRA manifest regulations and e-Manifest regulations. This rule requires manifest reporting, including discrepancy reporting through EPA’s e-manifest system. The NMED has access to this system

therefore manifest reporting described in the Permit is being revised to comply with the new EPA requirements. The new rule amended the time for reporting manifest discrepancies from 15 to 20 days.

The manifest reporting requirements are in Permit Attachment C, Section C-5b(1). To reduce redundancy, provide for more efficient Permit maintenance and to ensure consistent implementation the reporting requirement for unresolved manifest discrepancies is being deleted from text in Permit Attachment A1 since it is appropriately described in Permit Attachment C, Section C-5b(1).

The requirement for rejecting waste (returning waste to the generator/storage facility) for incidences where significant manifest discrepancies have not been resolved is being changed from 30 days (30) to sixty (60) days of waste receipt. This change is required to be consistent with 40 CFR §264.72(d)(1).

Revised Permit Text:

ATTACHMENT A1

CONTAINER STORAGE

A1-1d Container Management Practices

A1-1d(2) CH TRU Mixed Waste Handling

For inventory control purposes, TRU mixed waste container identification numbers are verified in accordance with Permit Attachment C, Section C-5b(1). Inconsistencies will be resolved with the generator before TRU mixed waste is emplaced. ~~Discrepancies that are not resolved within 15 days will be reported to the NMED in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.72).~~

A1-1d(3) RH TRU Mixed Waste Handling

CNS 10-160B Cask Unloading

The Hot Cell Bridge Crane connects to an empty Facility Canister, places it into a sleeve at the inspection station, and removes the canister lid. The Overhead Powered Manipulator or Hot Cell Crane lifts one drum from the drum carriage unit. The Hot Cell Manipulators collect swipe samples from the drum and transfer the swipes via the Transfer Drawer to the Hot Cell Gallery for counting. If the 55-gal (208-L) drums are contaminated, the Permittees may decontaminate the 55-gal (208-L) drums or return them to the generator/storage site or another site for remediation. The drum identification number is recorded, and the recorded numbers are verified against the WWIS. If there are any discrepancies, the drum(s) in question are stored within the Hot Cell, and the generator/storage site is contacted for resolution. ~~Discrepancies that are not resolved within 15 days will be reported to the NMED as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.72).~~

Transfer of Disposal Canister into the Facility Cask

For canisters received at the WIPP facility from the generator site in a RH-TRU 72-B cask, the identification number is verified using cameras, which also provide images of the canister surfaces during the lifting operation. Identification numbers are verified in accordance with Permit Attachment C, Section C-5b(1). If there are any discrepancies, the canister is returned to the RH-TRU 72-B cask, returned to the PAU, and the generator is contacted for resolution. ~~Discrepancies that are not resolved within 15 days will be reported to the NMED as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.72).~~ As the canister is being lifted from the RH-TRU 72-B cask into the Facility Cask, additional swipe samples may be taken.

ATTACHMENT C

WASTE ANALYIS PLAN

C-5b(1) Examination of the EPA Uniform Hazardous Waste Manifest and Associated Waste Tracking Information

Manifest discrepancies will be identified during manifest examination and container bar-code WWIS data comparison. A manifest discrepancy is a difference between the quantity or type of hazardous waste designated on the manifest and the quantity or type of hazardous waste the Permittees actually receive. The generator/storage site technical contact (as listed on the manifest) will be contacted to resolve the discrepancy. If the discrepancy is identified prior to the containers being removed from the package or shipping cask, the waste will be retained in the parking area. If the discrepancy is identified after the waste containers are removed from the package or cask, the waste will be retained in the Waste Handling Building (**WHB**) until the discrepancy is resolved. Errors on the manifest can be corrected by the Permittees at the WIPP facility with a verbal (followed by a mandatory written) concurrence by the generator/storage site technical contact. Discrepancies that are unresolved within ~~fifteen~~ twenty (~~15~~20) days of receiving the waste will be ~~immediately~~ reported to the e-Manifest system pursuant to 40 CFR §264.72(c)(2) ~~NMED in writing. Notifications to the NMED will consist of a letter describing the discrepancies, discrepancy resolution, and a copy of the manifest.~~ If the manifest discrepancies have not been resolved within ~~thirty~~ sixty (~~30~~60) days of waste receipt, the shipment will be returned to the generator/storage facility, pursuant to 40 CFR §264.72(d)(1). If it becomes necessary to return waste containers to the generator/storage site, a new EPA Uniform Hazardous Waste Manifest may be prepared by the Permittees.

Item 2

Description

This modification updates the procedure number for patrols and adds a preoperational procedure for the Salt Handling Hoist Preoperational inspection. Permit Attachment E has been updated with the following changes:

- Table E-1, *Inspection Schedule/Procedures*
    - Replaced “17-SS1023” with “17-SPO1003”
    - Added “WP 04-HO1005”

Basis

This change is classified as and “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 a procedure number and add a procedure number. These new procedures include the respective Permit-required inspection criteria per Table E-1.

Revised Permit Text:

ATTACHMENT E

INSPECTION SCHEDULE, PROCESS AND FORMS

Table E-1
Inspection Schedule/Procedures

System/Equipment Name	Responsible Organization	Inspection[a] Frequency	Procedure Number and Inspection Criteria[h]
Perimeter Fence, Gates, Signs	Security	Daily	WP ~~17-SS1023~~17-SPO1023 Inspecting for Deterioration[b] and Required Permit Part 2, Section 2.6.4 warning signs
Salt Handling Shaft Hoist	Underground Operations	Preoperational[c]	WP 04-HO1002 WP 04-HO1005 Inspecting for Deterioration[b], Safety Equipment, Communication Systems, and Mechanical Operability[m] in accordance with MSHA requirements

Item 3

Description

This modification updates the location of the underground Rescue Cart, Medical Cart and Fire Suppression Cart. Permit Attachment D, *RCRA Contingency Plan*, is updated with the following changes:

- Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*
    - Replaced “S700/E140” with “S550/E140” for rows “Rescue Cart”, “Medical Cart”, and “Fire Suppression Cart”

Basis

This change is classified as a “Replacement with functionally equivalent equipment, upgrade, or relocate emergency equipment listed” and is, therefore, a Class 1 Permit modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, B.6.b).

Discussion

This change is needed to update the locations of the underground vehicle parking and charging stations for the underground rescue cart, underground medical cart, and underground fire suppression cart. This equipment was relocated from the underground S700/E140 to the S550/E140 drift location.

Revised Permit Text:

ATTACHMENT D

RCRA CONTINGENCY PLAN

Table D-2
Emergency Equipment Maintained at the Waste Isolation Pilot Plant

Equipment	Description and Capabilities	Location
Medical Resources		
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~~S550/E140)
Fire Detection and Fire Suppression Equipment		
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~~S550/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~~S550/E140)

Item 4

Description

This modification removes the location for a fire alarm panel. Permit Attachment D, *RCRA Contingency Plan*, is updated with the following changes:

- Table D-2, *Emergency Equipment Maintained at the Waste Isolation Pilot Plant*
    - Deleted “Between E-140 and E-300 in S-2180 Drift”

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 remove an obsolete fire alarm panel. This fire alarm panel was for S-2180 and E-140 where there was previously a charcoal scrubber that required a fire alarm panel. However, the charcoal scrubber has been removed and is no longer used, therefore, the fire alarm panel is no longer needed. Additionally, this area has been designated as a prohibited area.

Revised Permit Text:

ATTACHMENT D

RCRA CONTINGENCY PLAN

Table D-2
Emergency Equipment Maintained at the Waste Isolation Pilot Plant

Equipment	Description and Capabilities	Location
Communications		
Underground Fire Alarms	Fire alarm panels 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)

Item 5

Description

This modification updates the RCRA Emergency Coordinators list to reflect the addition of two 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*
    - Added “G.A. (Gary) Collis, Jr., (575) 234-8276, (575) 234-8111”
    - Added “F.R. (Fidencio) Gomez, (575) 234-8276, (575) 234-8111”

Basis

This change is classified as “General Facility Standards, Contingency Plan: Changes is 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 G.A. (Gary) Collis, Jr., and F.R. (Fidencio) Gomez to the list of RCRA Emergency Coordinators.

Revised Permit Text:

ATTACHMENT D

RCRA CONTINGENCY PLAN

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
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
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
D.J. (Derek) Tweedy		(575) 234-8272		(575) 234-8111
J.W. (Justin) Bailey		(575) 234-8276		(575) 234-8111
J.N. (Jacob) Galindo		(575) 234-8276		(575) 234-8111
D.W. (Devlin) Willingham		(575) 234-8276		(575) 234-8111
S.B. (Samuel) Vasquez		(575) 234-8276		(575) 234-8111
C.L. (Cody) Rich		(575) 234-8276		(575) 234-8111
T.B. (Trevor) Dominguez		(575) 234-8276		(575) 234-8111
D.D. (Dario) Corral		(575) 234-8276		(575) 234-8111
T.K. (Taren) Wright		(575) 234-8276		(575) 234-8111
E.T. (Eric) Galindo		(575) 234-8276		(575) 234-8111
M.A. (Michael) Harris		(575) 234-8276		(575) 234-8111
G.A. (Gary) Collis, Jr.		(575) 234-8276		(575) 234-8111
F.R. (Fidencio) Gomez		(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 6

Description

This modification revises the responsibilities of the Mine Rescue Team (**MRT**) to provide more flexibility for the MRT to perform their firefighting capabilities. Permit Attachment D is updated with the following changes:

- Section D-2a, *Emergency Response Personnel*
    - Deleted “incipient stage”
    - Added “during rescue operations”

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 revise the responsibilities of the MRT to provide more flexibility for the MRT to fight fires beyond the insipient stage if all underground personnel are not accounted for. The MRT emergency response capabilities also include search, rescue, reentry, and recovery operations. The MRT responds in accordance with the requirements in 30 CFR Part 47.

Revised Permit Text:

ATTACHMENT D

RCRA CONTINGENCY PLAN

D-2 Emergency Response Personnel and Training

D-2a Emergency Response Personnel

- Mine Rescue Team (**MRT**)— The MRT emergency response capabilities include search, rescue, reentry, and recovery operations. The MRT responds in accordance with the requirements of 30 CFR Part 49. The MRT emergency response actions include extinguishing ~~incipient stage~~ fires, if encountered during rescue operations, and immediately reporting uncontrolled fires.

Item 7

Description

This modification adds the option to use pressure transducers for determining fluid densities for WIPP Groundwater Detection Monitoring Program (**DMP**) wells. Permit Attachment L is updated with the following changes:

- Section L-4c(1), *Groundwater Surface Elevation Monitoring Methodology*
    - Added “or pressure transducer data”
    - Deleted “other”
    - Deleted “measurements obtained using pressure transducers”

Basis

This change is classified as a “Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls)” and is, therefore, a Class 1 Permit modification pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42, Appendix I, A.3).

Discussion

This change is needed to utilize pressure transducers for fluid density measurements for DMP wells. Pressure transducers provide density measurements equivalent to hydrometers. Pressure transducers are now installed in each DMP well. Density measurements can be readily obtained using the installed pressure transducers without sampling wells.

Revised Permit Text:

ATTACHMENT L

WIPP GROUNDWATER DETECTION MONITORING PROGRAM PLAN

L-4c(1) Groundwater Surface Elevation Monitoring Methodology

Density calculations are performed annually. Density for the DMWs will be expressed as specific gravity as measured in the field during sampling events using a hydrometer or pressure transducers. Freshwater head for ~~other~~ Culebra wells will be calculated as described above from fluid density ~~measurements obtained using pressure transducers~~.