

**ATTACHMENT A**  
**GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION**

Waste Isolation Pilot Plant  
Hazardous Waste Permit  
~~October 2021~~ February 2022

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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 NMAC. Both contact-  
4 handled (**CH**) and remote-handled (**RH**) TRU mixed wastes are permitted for storage and  
5 disposal at the WIPP facility.

6 A-3 Property Description

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

15 A-4 Facility Type

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

33 Four vertical shafts connect the surface facility to the underground. These are the Waste Shaft,  
34 the Salt Handling Shaft, the Exhaust Shaft and the Air Intake Shaft. A fifth shaft, Shaft #5,  
35 located nominally 1,200 feet west of the Air Intake Shaft also connects the underground facility  
36 to the surface. The Waste Shaft is the only shaft used to transport TRU mixed waste to the  
37 underground. The WIPP underground structures are located in a mined salt bed 2,150 feet  
38 below the surface.

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

1 The underground structures include the underground Hazardous Waste Disposal Units  
2 (**HWDUs**), an area for future underground HWDUs, the shaft pillar area, interconnecting drifts  
3 and other areas unrelated to the Hazardous Waste Facility Permit. The underground HWDUs  
4 are defined as waste panels, each consisting of seven rooms and two access drifts. The WIPP  
5 underground area is designated as Panels 1 through 10, although only Panels 1 through 8 will  
6 be used under the terms of this permit. Each of the seven rooms is approximately 300 feet long,  
7 33 feet wide and 13 feet high **in Panels 1-7, and approximately 300 feet long, 33 feet wide, and**  
8 **16 feet high in Panel 8**. Part 4 of the permit authorizes the management and disposal of CH and  
9 RH TRU mixed waste containers in underground HWDUs. The Disposal Phase consists of  
10 receiving CH and RH TRU mixed waste shipping containers, unloading and transporting the  
11 waste containers to the underground HWDUs, emplacing the waste in the underground  
12 HWDUs, and subsequently achieving closure of the underground HWDUs in compliance with  
13 applicable State and Federal regulations. As required by 20.4.1.500 NMAC (incorporating 40  
14 CFR §264.601), the Permittees shall ensure that the environmental performance standards for a  
15 miscellaneous unit, which are applied to the underground HWDUs in the geologic repository, will  
16 be met. Permit Attachment A2 describes the underground HWDUs, the TRU mixed waste  
17 management facilities and operations, and compliance with the technical requirements of  
18 20.4.1.500 NMAC.

#### 19 A-5 Waste Description

20 Wastes destined for WIPP are byproducts of nuclear weapons production and have been  
21 identified in terms of waste streams based on the processes that produced them. Each waste  
22 stream identified by generators is assigned to a Waste Summary Category to facilitate RCRA  
23 waste characterization, and reflect the final waste forms acceptable for WIPP disposal.

24 These Waste Summary Categories are:

##### 25 S3000—Homogeneous Solids

26 Solid process residues defined as solid materials, excluding soil, that do not meet the  
27 applicable regulatory criteria for classification as debris [20.4.1.800 NMAC, (incorporating  
28 40 CFR §268.2(g) and (h))]. Solid process residues include inorganic process residues,  
29 inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are  
30 included in this Waste Summary Category based on the specific waste stream types and  
31 final waste form. This category includes wastes that are at least 50 percent by volume  
32 solid process residues.

##### 33 S4000—Soils/Gravel

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

##### 36 S5000—Debris Wastes

37 This waste summary category includes waste that is at least 50 percent by volume  
38 materials that meet the NMAC criteria for classification as debris (20.4.1.800 NMAC  
39 (incorporating 40 CFR §268.2)). Debris means solid material exceeding a 2.36 inch (60  
40 millimeter) particle size that is intended for disposal and that is: 1) a manufactured object,  
41 2) plant or animal matter, or 3) natural geologic material.

42 The S5000 Waste Summary Category includes metal debris, metal debris containing lead,  
43 inorganic nonmetal debris, asbestos debris, combustible debris, graphite debris,  
44 heterogeneous debris, and composite filters, as well as other minor waste streams.

1 Particles smaller than 2.36 inches in size may be considered debris if the debris is a  
2 manufactured object and if it is not a particle of S3000 or S4000 material.

3 If a waste does not include at least 50 percent of any given category by volume,  
4 characterization shall be performed using the waste characterization process required for the  
5 category constituting the greatest volume of waste for that waste stream.

6 Wastes may be generated at the WIPP facility as a direct result of managing the TRU and TRU  
7 mixed wastes received from the off-site generators. Such waste may be generated in either the  
8 WHB or the underground. This waste is referred to as "derived waste." All such derived waste  
9 will be placed in the rooms in HWDUs along with the TRU mixed waste for disposal.

10 Non-mixed hazardous wastes generated at the WIPP, through activities where contact with TRU  
11 mixed waste does not occur, are characterized, placed in containers, and stored (for periods not  
12 exceeding the limits specified in 20.4.1.300 NMAC (incorporating 40 CFR §262.17)) until they  
13 are transported off site for treatment and/or disposal at a permitted facility. This waste  
14 generation and accumulation activity, when performed in compliance with 20.4.1.300 NMAC  
15 (incorporating 40 CFR §262), is not subject to RCRA permitting requirements and, as such, is  
16 not addressed in the permit, with the exception of the requirements of 20.4.1.300 NMAC  
17 (incorporating 40 CFR Part 262, Subpart M), which are addressed in Permit Attachment D.

#### 18 A-6 Chronology of Events Relevant to Changes in Ownership or Operational Control

19 December 19, 1997 NMED received notification of a change of name/ownership from  
20 Westinghouse Electric Corporation to CBS Corporation. The WIPP  
21 Management and Operating Contractor (**MOC**), Westinghouse Waste  
22 Isolation Division (**WID**), became a division of Westinghouse Electric  
23 Company, which in turn was a division of CBS Corporation. Notification to  
24 NMED was made by the permit applicant in a letter dated December 18,  
25 1997. The permit application was under review, but a draft permit was not  
26 yet issued.

27 September 22, 1998 NMED received notification of a pending transfer of ownership for the  
28 MOC, Westinghouse WID, from CBS Corporation to an as-yet-to-be-  
29 named limited liability company owned jointly by British Nuclear Fuels, plc  
30 and Morrison-Knudsen Corporation. The transfer of ownership was  
31 scheduled to occur on or about December 15, 1998. Notification to NMED  
32 was made by the permit applicant in a letter dated September 17, 1998.  
33 The draft permit had been issued for public comment, but the final permit  
34 was not yet issued.

35 March 9, 1999 NMED again received notification of the pending divestiture of the MOC,  
36 Westinghouse WID, by CBS Corporation to the limited liability company  
37 owned jointly by British Nuclear Fuels, plc and Morrison-Knudsen  
38 Corporation known as MK/BNFL GESCO LLC. The new MOC would be  
39 renamed to Westinghouse Government Environmental Services  
40 Company LLC. Notification to NMED was made by the permit applicant in  
41 a letter dated March 2, 1999. The public hearing on the permit was  
42 underway, but the final permit was not yet issued.



- 1 March 26, 1999 NMED received official notification of the divestiture of Westinghouse  
2 Electric Company by CBS Corporation to MK/BNFL GESCO LLC  
3 effective March 22, 1999. The MOC was renamed Westinghouse  
4 Government Environmental Services Company LLC (**WGES**), of which  
5 Westinghouse Waste Isolation Division was a division. This transaction  
6 constituted a change of operational control under 20.4.1.900 NMAC  
7 (incorporating 40 CFR §270.40). Notification to NMED was made by the  
8 permit applicant in a letter dated March 24, 1999. The public hearing on  
9 the permit was nearly concluded, but the final permit was not yet issued.
- 10 April 28, 1999 NMED received a revised Part A Permit Application in a letter dated April  
11 21, 1999, reflecting that the Westinghouse Waste Isolation Division, co-  
12 operator of the WIPP hazardous waste facility, was now a part of WGES.  
13 However, the final permit, issued October 27, 1999, did not reflect the  
14 change in ownership.
- 15 July 25, 2000 NMED received a Class 1 permit modification in a letter dated July 21,  
16 2000, changing the name in the Permit from Westinghouse Electric  
17 Corporation to Westinghouse Government Environmental Services  
18 Company LLC (**WGES**), Waste Isolation Division (**WID**). However, this  
19 notification did not constitute the required permit modification under  
20 20.4.1.900 NMAC (incorporating 40 CFR §270.40) necessary to reflect  
21 the transfer of the permit to a new operator.
- 22 December 15, 2000 DOE announced that it had awarded a five-year contract for management  
23 and operation of WIPP to Westinghouse TRU Solutions LLC, a limited  
24 liability company owned jointly by WGES LLC and Roy F. Weston, Inc.  
25 The announcement further stated that, following a brief transition period,  
26 the new contractor would assume MOC responsibilities on February 1,  
27 2001. This transaction constituted a change of operational control under  
28 20.4.1.900 NMAC (incorporating 40 CFR §270.40) requiring a Class 1  
29 permit modification with prior written approval of NMED.
- 30 February 5, 2001 NMED received a Class 1 permit modification in a letter dated February 2,  
31 2001, which notified NMED of an organizational name change of the  
32 MOC from Westinghouse Government Environmental Services Company  
33 LLC Waste Isolation Division to Westinghouse TRU Solutions LLC.  
34 However, this notification did not constitute the required permit  
35 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)  
36 necessary to reflect the transfer of the permit to a new operator.
- 37 December 31, 2002 NMED received a Class 1 permit modification in a letter dated December  
38 27, 2002, which changed the name of the MOC from Westinghouse TRU  
39 Solutions LLC to Washington TRU Solutions LLC. Again, this notification  
40 did not constitute the required permit modification under 20.4.1.900  
41 NMAC (incorporating 40 CFR §270.40) necessary to reflect the transfer of  
42 the permit to a new operator.
- 43 February 28, 2003 NMED received a Class 1 permit modification requiring prior agency  
44 approval in a letter dated February 28, 2003, to satisfy the requirements

- 1 specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.40) to reflect  
2 the transfer of the permit to a new operator.
- 3 September 16, 2004 NMED received a Class 1 permit modification requiring prior agency  
4 approval in a letter dated September 16, 2004, describing a change of  
5 ownership of Washington TRU Solutions LLC (**WTS**). WTS is owned  
6 jointly by WGES, managing member, and Weston Solutions, Inc. WGES  
7 had been owned jointly by Washington Group International, Inc. (**WGI**),  
8 and BNFL Nuclear Services, Inc. However, WGI has acquired BNFL's  
9 prior interest in the former Westinghouse government services  
10 businesses, which includes BNFL's prior interest in WGES.
- 11 August 6, 2007 NMED received notification in a letter dated August 2, 2007 of the  
12 pending acquisition of WGI by URS Corporation at an unknown future  
13 date. This acquisition would be related to operational control, because  
14 WGI is the sole owner of WGES, managing member of the joint venture,  
15 along with Weston Solutions, Inc., that owns WTS, the WIPP MOC. This  
16 notification was submitted to assure compliance with 20.4.1.900 NMAC  
17 (incorporating 40 CFR §270.40(b)).
- 18 November 26, 2007 NMED received a Class 1 permit modification requiring prior agency  
19 approval in a letter dated November 19, 2007, describing a change of  
20 ownership of WTS. On November 15, 2007, WGI was acquired by URS  
21 Corporation. WTS is owned jointly by WGES, managing member, and  
22 Weston Solutions, Inc. WGES, formerly owned by WGI, is now owned by  
23 URS Corporation.
- 24 October 1, 2012 NMED received a Class 1 permit modification requiring prior agency  
25 approval in a letter dated June 25, 2012 describing a change in the MOC  
26 for the WIPP facility. The new MOC for the WIPP facility will be Nuclear  
27 Waste Partnership LLC. The new MOC is comprised of URS Energy &  
28 Construction, Inc. and Babcock and Wilcox Technical Services Group,  
29 Inc.
- 30 April 1, 2014 URS announced an organizational realignment to move Global  
31 Management and Operational Services Group (GMOS) from URS Energy  
32 & Construction to URS Federal Services Division. Nuclear Waste  
33 Partnership LLC is part of GMOS and remains in this group. The MOC is  
34 comprised of URS Federal Services, Inc. and Babcock and Wilcox  
35 Technical Services Group, Inc.
- 36 January 5, 2015 On January 5, 2015 URS merged with AECOM. The WIPP Management  
37 and Operating Contractor (MOC), Nuclear Waste Partnership LLC, is  
38 comprised of URS Energy & Construction, Inc. (an organization within  
39 AECOM) and Babcock and Wilcox Technical Services Group, Inc. This  
40 merger is therefore not related to a change in operational control because  
41 URS Energy & Construction, Inc. continues to be 70% owner of  
42 Nuclear Waste Partnership LLC.
- 43 July 1, 2015 On June 8, 2015 the Babcock & Wilcox Company announced its intent to  
44 change the name to BWXT Technical Services Group, Inc. (BWXT TSG).

1 This change was effective July 1, 2015. No changes are being made to  
2 the Management and Operating Contractor (MOC). The MOC is  
3 comprised of URS Energy & Construction, Inc. and BWXT Technical  
4 Services Group, Inc.

5 September 19, 2016 URS Energy & Construction, Inc. changed its name to AECOM Energy &  
6 Construction, Inc. This name change was effective September 19, 2016.  
7 No changes are being made to the Management and Operating  
8 Contractor (MOC). This is a name change only; there was no change in  
9 operational control. The MOC, Nuclear Waste partnership LLC, is  
10 comprised of AECOM Energy & Construction, Inc. and BWXT Technical  
11 Services Group, Inc. This change does not constitute the required permit  
12 modification under 20.4.1.900 NMAC (incorporating 40 CFR §270.40)  
13 necessary to reflect the transfer of the permit to a new operator.

14 January 31, 2020 Lindsay Goldberg/American Securities purchased AECOM's  
15 Management Services group, forming a new company named Amentum.  
16 Included in that transaction was AECOM Energy & Construction, Inc.,  
17 which continues to be the legal guarantor and majority owner of the MOC,  
18 Nuclear Waste Partnership LLC. No changes are being made to the  
19 MOC. Nuclear Waste Partnership LLC is still comprised of AECOM  
20 Energy & Construction, Inc. and BWXT Technical Services Group, Inc.  
21 This is a change in ultimate parent company only; there was no change in  
22 operational control. Therefore, this change does not constitute the  
23 required permit modification under 20.4.1.900 NMAC (incorporating 40  
24 CFR §270.40) necessary to reflect the transfer of the permit to a new  
25 operator.