



**Department of Energy**  
Carlsbad Field Office  
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Carlsbad, New Mexico 88221

AUG 27 2007

Mr. James Bearzi, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 W. Rodeo Park Dr. Bldg 1  
Santa Fe, New Mexico 87502-6303

Subject: Notification of a Class 3 Permit Modification to the Hazardous Waste Facility  
Permit, Permit Number: NM4890139088-TSDF

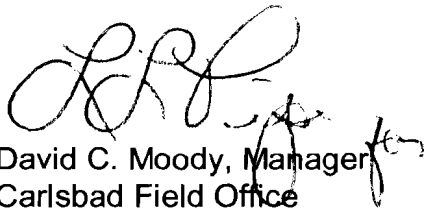
Dear Mr. Bearzi:

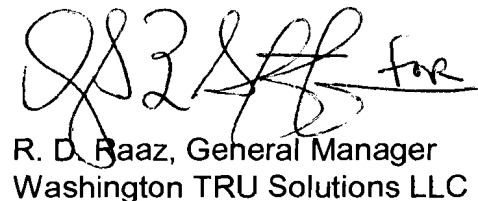
Enclosed is a Class 3 Permit Modification Request to:

Modify the WIPP Hazardous Waste Facility Permit to accurately reflect that No Further Action is required for Solid Waste Management Units and Areas of Concern.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with 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.

Sincerely,

  
David C. Moody, Manager  
Carlsbad Field Office

  
R. D. Raaz, General Manager  
Washington TRU Solutions LLC

Enclosure

cc: w/enclosure  
C. Walker, Trinity Engineering \* ED  
S. Zappe, NMED ED

cc: w/o enclosure  
J. Kieling, NMED ED  
\*ED denotes electronic distribution

**Class 3 Permit Modification Request**

**Modify the WIPP Hazardous Waste Facility Permit to Accurately  
Reflect That No Further Action is Required For Solid Waste  
Management Units and Areas of Concern**

**Waste Isolation Pilot Plant  
Carlsbad, New Mexico**

**WIPP HWFP #NM4890139088-TSDF**

**August 2007**

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## Overview of the Permit Modification Request

This document contains a Class 3 Permit Modification Request (**PMR**) for the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit (**HWFP**), Number NM4890139088-TSDF, hereinafter referred to as the WIPP HWFP. This PMR is a result of a determination by the New Mexico Environment Department (NMED) on April 20, 2007 which stated that no further action is necessary for Solid Waste Management Units (**SWMUs**) and Areas Of Concern (**AOCs**) listed in the WIPP HWFP. Because no further action is needed, the permit must be modified to accurately reflect this status. The HWFP directs that such changes be accomplished through the Class 3 Permit Modification process found in 20.4.1.900 New Mexico Administrative Code (**NMAC**) (incorporating Title 40, Code of Federal Regulations (**CFR**) 270.42(c)).

This PMR is being submitted by the U.S. Department of Energy (**DOE**), Carlsbad Field Office (**CBFO**) and Washington TRU Solutions LLC (**WTS**), collectively referred to as the Permittees, in accordance with the WIPP HWFP, Condition VII.P.1 (20.4.1.900 NMAC incorporating CFR §270.42(c)). The modification proposes to:

- delete Tables 2 and 3 from Module VII of the HWFP and
- add Table 4 in Module VII of the HWFP.

The proposed changes are based on direction from the NMED to request No Further Action for these SWMUs and AOCs. This action will not reduce the ability of the Permittees to provide continued protection to human health and the environment.

The requested modifications to the WIPP HWFP and related supporting documents are provided in this PMR. The proposed modifications to the text of the WIPP HWFP have been identified using a double underline, and a ~~strikeout~~ font for deleted information. All direct quotations are indicated by italicized text. The following information specifically addresses how compliance has been achieved with the 20.4.1.900 NMAC requirements for submission of this Class 3 PMR.

### Current Regulatory Status

*According to Permit Condition VII.A, an “Area of Concern” means any discernable unit or area which, in the opinion of the Secretary, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Secretary may require investigation of the AOC to determine if it is a SWMU. If shown to be a SWMU by the investigation, the AOC shall be reported by the Permittees as a newly-identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Secretary may determine that no further action is necessary and notify the Permittees in writing.”*

The HWFP defines a SWMU as follows, “*“Solid Waste Management Unit” means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released. The definition includes regulated units (i.e., landfills, surface impoundments, waste piles and land treatment units) but does not include passive leakage or one-time spills from production areas and units in which wastes have not been managed (e.g., product storage areas).”*

The Permittees submitted a *No Further Action Petition for Solid Waste Management Units and Areas of Concern* to the NMED in September 2002.

At the request of the NMED, the Permittees submitted sampling data collected on AOCs in April 2006 and submitted sampling data on SWMU 001g collected in January 2007.

Based upon these submittals the NMED approved the Permittees No Further Action Petition for Solid Waste Management Units and Areas of Concern on April 20, 2007, and directed the Permittees to initiate this Class 3 PMR.

1. **20.4.1.900 NMAC (incorporating 40 CFR §270.42(c)(1)(i)) requires the applicant to describe the exact change to be made to the permit conditions and supporting documents referenced by the permit.**

This PMR is being submitted to request the following changes to Module VII of the WIPP HWFP entitled *Corrective Action For Solid Waste Management Units*:

1. Delete Table 2 entitled *SWMUs Requiring An RFI*.
2. Delete Table 3 entitled *AOCs Included in the Permit*.
3. Add Table 4 entitled *SWMUs/AOCs Requiring No Further Action*.

The exact changes to permit conditions and supporting documents are included in Attachment B.

2. **20.4.1.900 NMAC (incorporating 40 CFR §270.42(c)(1)(ii)) requires the applicant to identify that the modification is a Class 3 modification.**

The proposed modification is classified as a Class 3 permit modification in accordance with Permit Condition VII.P.1.

3. **20.4.1.900 NMAC (incorporating 40 CFR §270.42(c)(1)(iii)) requires the applicant to explain why the modification is needed.**

### **Overview**

NMED issued Module VII (*Corrective Action for Solid Waste Managements Units*) as part of the WIPP Permit on October 27, 1999. Module VII required investigation of 23 sites referred to as SWMUs and AOCs in the HWFP and listed in Tables 2 and 3 of Module VII of the HWFP. The Permittees submitted the *WIPP No Further Action Petition for Solid Waste Management Units and Areas of Concern* in September 2002 and collected additional data in April 2006 and January 2007. Based upon those submittals the NMED issued an approval of the petition on April 20, 2007.

## **No Further Action (NFA) Criteria**

During investigation of SWMUs and AOCs at WIPP, it was determined that some sites identified as SWMUs or AOCs never managed (generated, treated, stored, or disposed of) Resource Conservation and Recovery Act (**RCRA**) solid or hazardous wastes and/or constituents or other Comprehensive Environmental Response, Compensation and Liability Act of 1980 (**CERCLA**) hazardous substances. Additionally, some SWMUs and AOCs never had a release to the environment, and future releases were determined to be unlikely. Finally, some SWMUs and AOCs were characterized and/or remediated in accordance with current applicable state and/or federal regulations, and confirmatory sampling data indicate that the remaining contaminant concentrations do not pose unacceptable levels of risk to human health or the environment under current and projected future land uses.

The criteria established by the NMED (*Technical Support Document, Exclusion/inclusion of Solid Waste Management Units and Areas of Concern, Table 4, October 27, 1999*) to qualify a SWMU or AOC for NFA are defined below:

1. The site does not exist. If it can be shown that the site does not exist, then a proposal may be made for NFA.
2. The site was not used for the management of hazardous constituents. If this can be shown, then a proposal may be made for NFA.
3. There was no release of hazardous constituents to the environment. If it can be shown that there was not, nor is there likely to be a release, then a proposal may be made for NFA.
4. There was a release, but a release assessment indicates that the concentrations of hazardous constituents are at acceptably low levels as determined by regulators. The release assessment includes site characterization, release assessment sampling, and risk assessment.
5. There was a release, but the site was characterized and/or remediated under another authority, such as the New Mexico Underground Storage Tank Bureau, and, documentation such as closure letter is available, then the site may be proposed for NFA. Regulation of a site by another authority is not, necessarily, sufficient justification for a proposal for NFA.
6. There was a release, but the site has been remediated. Typically, the site would have been remediated by means of Voluntary Corrective Actions or Expedited Cleanups/ Voluntary Corrective Measures. After remediation, evidence should show that concentrations of hazardous constituents are at acceptable levels as determined by regulators. If the site meets the criteria for remediation, then it may be proposed for NFA.

## **Description of SWMUs Proposed For NFA**

1. SWMU 001g  
This SWMU consists of the mud pits constructed from the drilling of the H-14 Culebra test well and the P-1 potash exploration well. This SWMU has been determined to be suitable for NFA under criterion 4.
2. SWMU 001h  
This SWMU consists of the mud pits constructed from the drilling of the H-15 Culebra test well and the P-2 potash exploration well. This SWMU has been determined to be suitable for NFA under criterion 4.
3. SWMU 001j  
This SWMU consists of the mud pit constructed from the drilling of the P-3 potash exploration well. This SWMU has been determined to be suitable for NFA under criterion 3.
4. SWMU 001k  
This SWMU consists of the mud pit constructed from the drilling of the P-4 potash exploration well. This SWMU has been determined to be suitable for NFA under criterion 3.
5. SWMU 001l  
This SWMU consists of the mud pits constructed from the drilling of the WIPP-12 exploration borehole and the P-5 potash exploration borehole. This SWMU has been determined to be suitable for NFA under criterion 4.
6. SWMU 001m  
This SWMU consists of the mud pit constructed from the drilling of the P-6 potash exploration borehole. This SWMU has been determined to be suitable for NFA under criterion 3.
7. SWMU 001n  
This SWMU consists of the mud pit constructed from the drilling of the P-15 potash exploration borehole. This SWMU has been determined to be suitable for NFA under criterion 3.
8. SWMU 001o  
This SWMU consists of the mud pit constructed from the drilling of the Badger Unit Federal Well #1 wildcat petroleum exploration well which was abandoned in 1974 but is on land under the jurisdiction of the DOE. This SWMU has been determined to be suitable for NFA under criterion 4.
9. SWMU 001p  
This SWMU consists of the mud pits constructed from the drilling of the Cotton Baby wildcat petroleum exploration well which was abandoned in 1974 but is on land under the jurisdiction of the DOE. This SWMU has been determined to be suitable for NFA under criterion 4.

10. SWMU 001q  
This SWMU consists of the mud pits constructed from the drilling of the DOE-1 well. This SWMU has been determined to be suitable for NFA under criterion 4.
11. SWMU 001s  
This SWMU consists of the mud pit constructed from the drilling of the ERDA-9 exploratory borehole. This SWMU has been determined to be suitable for NFA under criterion 3.
12. SWMU 001t  
This SWMU consists of the mud pit constructed from the drilling of the IMC-374 exploratory borehole. This SWMU has been determined to be suitable for NFA under criterion 3.
13. SWMU 001x  
This SWMU consists of the mud pit constructed from the drilling of the WIPP-13 exploratory borehole. This SWMU has been determined to be suitable for NFA under criterion 4.
14. SWMU 004a  
This SWMU consists of an active material storage area used to store new and used parts. This SWMU has been determined to be suitable for NFA under criterion 4.
15. SWMU 007b  
This SWMU consists of the southwest evaporation pond area. This SWMU has been determined to be suitable for NFA under criterion 4.

#### **Description of AOCs Proposed For NFA**

1. AOC 001r  
This AOC consists of the mud pit constructed from the drilling of the D-123 potash exploration borehole. This AOC has been determined to be suitable for NFA under criterion 4.
2. AOC 001u  
This AOC consists of the mud pit constructed from the drilling of the IMC-376 potash exploration borehole. This AOC has been determined to be suitable for NFA under criterion 4.
3. AOC 001v  
This AOC consists of the mud pit constructed from the drilling of the IMC-456 potash exploration borehole. This AOC has been determined to be suitable for NFA under criterion 4.
4. AOC 001w  
This AOC consists of the mud pit constructed from the drilling of the IMC-457 potash exploration borehole. This AOC has been determined to be suitable for NFA under criterion 4.



5. AOC 001ac  
This AOC consists of the mud pit constructed from the drilling of the DSP-207 potash exploration borehole. This AOC has been determined to be suitable for NFA under criterion 4.
6. AOC 001ae  
This AOC consists of the mud pit constructed from the drilling of the IMC-337 potash exploration borehole. This AOC has been determined to be suitable for NFA under criterion 4.
7. AOC 010b  
This AOC consists of the unlined sump in the bottom of the Waste Handling Shaft at the WIPP facility. This AOC has been determined to be suitable for NFA under criterion 3 since it is part of the permitted facility and no release mechanism is available.
8. AOC 010c  
This AOC consists of the sump in the bottom of the Exhaust Shaft at the WIPP facility. This AOC has been determined to be suitable for NFA under criterion 3 since it is part of the permitted facility and no release mechanism is available.

#### **Description of New SWMUs Not Requiring an RFI**

Since the Permit was issued three additional hazardous waste disposal units have become active. These units are Panels 2, 3 and 4 and will be added to Table 2A as a Class 1 modification.

4. **20.4.1.900 NMAC (incorporating 40 CFR §270.42 (c)(1)(iv)) requires the applicant to provide the applicable information required by 40 CFR §§270.13 through 270.22, 270.62, 270.63 and 270.66.**

The regulatory crosswalk describes those portions of the WIPP HWFP that are affected by this PMR. Where applicable, regulatory citations in this modification reference Title 20, Chapter 4, Part 1, NMAC, revised June 14, 2000, incorporating the CFR, Title 40 (40 CFR Parts 264 and 270). 40 CFR §§270.16 through 270.22, 270.62, 270.63, and 270.66 are not applicable at WIPP. Consequently, they are not listed in the regulatory crosswalk table.

5. **20.4.1.900 NMAC (incorporating 40 CFR §270.11(d)(1) and 40 CFR §270.30(k)) requires that any person signing documents and reports must certify the document in accordance with 20.4.1.900 NMAC.**

The transmittal letter for this PMR contains the signed certification statement in accordance with Permit Condition I.F. of the WIPP HWFP.

## Regulatory Crosswalk

Regulatory Citation(s) 20.4.1.900 NMAC (incorporating 40 CFR Part 270)	Regulatory Citation(s) 20.4.1.500 NMAC (incorporating 40 CFR Part 264)	Description of Requirement	Added or Clarified Information		
			Section of the HWFP	Yes	No
§270.13		Contents of Part A permit application	Attachment O, Part A		✓
§270.14(b)(1)		General facility description	Attachment A		✓
§270.14(b)(2)	§264.13(a)	Chemical and physical analyses	Attachment B		✓
§270.14(b)(3)	§264.13(b)	Development and implementation of waste analysis plan	Attachment B		✓
	§264.13(c)	Off-site waste analysis requirements	Attachment B		✓
§270.14(b)(4)	§264.14(a-c)	Security procedures and equipment	Attachment C		✓
§270.14(b)(5)	§264.15(a-d)	General inspection requirements	Attachment D		✓
	§264.174	Container inspections	Attachment D		✓
§270.23(a)(2)	§264.602	Miscellaneous units inspections	Attachment D		✓
§270.14(b)(6)		Request for waiver from preparedness and prevention requirements of Part 264 Subpart C	NA		
§270.14(b)(7)	264 Subpart D	Contingency plan requirements	Attachment F		✓
	§264.51	Contingency plan design and implementation	Attachment F		✓
	§264.52 (a) & (c-f)	Contingency plan content	Attachment F		✓
	§264.53	Contingency plan copies	Attachment F		✓
	§264.54	Contingency plan amendment	Attachment F		✓
	§264.55	Emergency coordinator	Attachment F		✓
	§264.56	Emergency procedures	Attachment F		✓
§270.14(b)(8)		Description of procedures, structures or equipment for:	Attachment E		✓
§270.14(b)(8) (i)		Prevention of hazards in unloading operations (e.g., ramps and special forklifts)	Attachment E		✓
§270.14(b)(8) (ii)		Runoff or flood prevention (e.g., berms, trenches, and dikes)	Attachment E		✓
§270.14(b)(8) (iii)		Prevention of contamination of water supplies	Attachment E		✓
§270.14(b)(8) (iv)		Mitigation of effects of equipment failure and power outages	Attachment E		✓
§270.14(b)(8) (v)		Prevention of undue exposure of personnel (e.g., personal protective equipment)	Attachment E		✓
§270.14(b)(8) (vi) §270.23(a)(2)	§264.601	Prevention of releases to the atmosphere	Module II Module IV Attachment M2 Attachment N		✓
	264 Subpart C	Preparedness and Prevention	Attachment E		✓
	§264.31	Design and operation of facility	Attachment E		✓
	§264.32	Required equipment	Attachment E Attachment F		✓
	§264.33	Testing and maintenance of equipment	Attachment D		✓
	§264.34	Access to communication/alarm system	Attachment E		✓
	§264.35	Required aisle space	Attachment E		✓
	§264.37	Arrangements with local authorities	Attachment F		✓
§270.14(b)(9)	§264.17(a-c)	Prevention of accidental ignition or	Attachment E		✓

Regulatory Citation(s) 20.4.1.900 NMAC (incorporating 40 CFR Part 270)	Regulatory Citation(s) 20.4.1.500 NMAC (incorporating 40 CFR Part 264)	Description of Requirement reaction of ignitable, reactive, or incompatible wastes	Added or Clarified Information		
			Section of the HWFP	Yes	No
§270.14(b)(10)		Traffic pattern, volume, and controls, for example: Identification of turn lanes Identification of traffic/stacking lanes, if appropriate Description of access road surface Description of access road load-bearing capacity Identification of traffic controls	Attachment G		✓
§270.14(b)(11)(i) and (ii)	§264.18(a)	Seismic standard applicability and requirements	Part B, Rev. 6 Chapter B		✓
§270.14(b)(11)(iii-v)	§264.18(b)	100-year floodplain standard	Part B, Rev. 6 Chapter B		✓
	§264.18(c)	Other location standards	Part B, Rev. 6 Chapter B		✓
§270.14(b)(12)	§264.16(a-e)	Personnel training program	Permit Module II Attachment H		✓
§270.14(b)(13)	264 Subpart G	Closure and post-closure plans	Attachment I & J		✓
§270.14(b)(13)	§264.111	Closure performance standard	Attachment I		✓
§270.14(b)(13)	§264.112(a), (b)	Written content of closure plan	Attachment I		✓
§270.14(b)(13)	§264.112(c)	Amendment of closure plan	Attachment I		✓
§270.14(b)(13)	§264.112(d)	Notification of partial and final closure	Attachment I		✓
§270.14(b)(13)	§264.112(e)	Removal of wastes and decontamination/dismantling of equipment	Attachment I		✓
§270.14(b)(13)	§264.113	Time allowed for closure	Attachment I		✓
§270.14(b)(13)	§264.114	Disposal/decontamination	Attachment I		✓
§270.14(b)(13)	§264.115	Certification of closure	Attachment I		✓
§270.14(b)(13)	§264.116	Survey plat	Attachment I		✓
§270.14(b)(13)	§264.117	Post-closure care and use of property	Attachment J		✓
§270.14(b)(13)	§264.118	Post-closure plan; amendment of plan	Attachment J		✓
§270.14(b)(13)	§264.178	Closure/containers	Attachment I		✓
§270.14(b)(13)	§264.601	Environmental performance standards-Miscellaneous units	Attachment I		✓
§270.14(b)(13)	§264.603	Post-closure care	Attachment I		✓
§270.14(b)(14)	§264.119	Post-closure notices	Attachment J		✓
§270.14(b)(15)	§264.142	Closure cost estimate	NA		✓
	§264.143	Financial assurance	NA		✓
§270.14(b)(16)	§264.144	Post-closure cost estimate	NA		✓
	§264.145	Post-closure care financial assurance	NA		✓
§270.14(b)(17)	§264.147	Liability insurance	NA		✓
§270.14(b)(18)	§264.149-150	Proof of financial coverage	NA		✓

Regulatory Citation(s) 20.4.1.900 NMAC (incorporating 40 CFR Part 270)	Regulatory Citation(s) 20.4.1.500 NMAC (incorporating 40 CFR Part 264)	Description of Requirement	Added or Clarified Information		
			Section of the HWFP	Yes	No
§270.14(b)(19)(i), (vi), (vii), and (x)		Topographic map requirements Map scale and date Map orientation Legal boundaries Buildings Treatment, storage, and disposal operations Run-on/run-off control systems Fire control facilities	Attachment O Part A		✓
§270.14(b)(19)(ii)	§264.18(b)	100-year floodplain	Attachment O Part A		✓
§270.14(b)(19)(iii)		Surface waters	Attachment O Part A		✓
§270.14(b)(19)(iv)		Surrounding Land use	Attachment O Part A		✓
§270.14(b)(19)(v)		Wind rose	Attachment O Part A		✓
§270.14(b)(19)(viii)	§264.14(b)	Access controls	Attachment O Part A		✓
§270.14(b)(19)(ix)		Injection and withdrawal wells	Attachment O Part A		✓
§270.14(b)(19)(xi)		Drainage on flood control barriers	Part B, Rev. 6 Chapter B, E, F		✓
§270.14(b)(19)(xii)		Location of operational units	Part B, Rev. 6 Chapter B		✓
§270.14(b)(20)		Other federal laws Wild and Scenic Rivers Act National Historic Preservation Act Endangered Species Act Coastal Zone Management Act Fish and Wildlife Coordination Act Executive Orders	Part B, Rev. 6 Chapter K		✓
§270.15	§264 Subpart I	Containers	Attachment M1		✓
	§264.171	Condition of containers	Attachment M1		✓
	§264.172	Compatibility of waste with containers	Attachment M1		✓
	§264.173	Management of containers	Attachment M1		✓
	§264.174	Inspections	Attachment D Attachment M1		✓
§270.15(a)	§264.175	Containment systems	Attachment M1		✓
§270.15(c)	§264.176	Special requirements for ignitable or reactive waste	Attachment E Permit Module II		✓
§270.15(d)	§264.177	Special requirements for incompatible wastes	Attachment E Permit Module II		✓
	§264.178	Closure	Attachment I		✓
§270.15(e)	§264.179	Air emission standards	Attachment E Attachment N		✓
§270.23	264 Subpart X	Miscellaneous units	Attachment M2		✓
§270.23(a)	§264.601	Detailed unit description	Attachment M2		✓

Regulatory Citation(s) 20.4.1.900 NMAC (incorporating 40 CFR Part 270)	Regulatory Citation(s) 20.4.1.500 NMAC (incorporating 40 CFR Part 264)	Description of Requirement	Added or Clarified Information		
			Section of the HWFP	Yes	No
§270.23(b)	§264.601	Hydrologic, geologic, and meteorologic assessments	Permit Module IV Attachment M2		✓
§270.23(c)	§264.601	Potential exposure pathways	Permit Module IV Attachment M2 Attachment N		✓
§270.23(d)		Demonstration of treatment effectiveness	Permit Module IV Attachment M2 Attachment N		✓
	§264.602	Monitoring, analysis, inspection, response, reporting, and corrective action	Permit Module IV Attachment M2 Attachment N		✓
	§264.603	Post-closure care	Attachment J Attachment J1		✓
	264 Subpart E	Manifest system, record keeping, and reporting	Permit Module I Permit Module II Permit Module IV Attachment B		✓
§270.14(d)	§264.101	Corrective Action for Solid Waste Management Units	Module VII	✓	

**Attachment A**  
**Table of Changes**

## Table of Changes

Affected Permit Section	Explanation for Change
a.1. Module VII	Revise Table of Contents, delete Table 2 and 3 and add new Table 4

**Attachment B**  
**Proposed Revised Permit Text**



## Proposed Revised Permit Text

### MODULE VII - CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

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**TABLE 2**  
**SWMUS REQUIRING AN RFI**

SWMU NUMBER	NAME
<del>Drilling Mud Pits (13 SWMUs)</del>	
<del>SWMU 001g</del>	<del>H 14/P 1 Mud Pit (s)</del>
<del>SWMU 001h</del>	<del>H 15/P 2 Mud Pit (s)</del>
<del>SWMU 001j</del>	<del>P 3 Mud Pit</del>
<del>SWMU 001k</del>	<del>P 4 Mud Pit</del>
<del>SWMU 001l</del>	<del>WIPP 12/P 5 Drilling Mud Pit(s)</del>
<del>SWMU 001m</del>	<del>P 6 Mud Pit</del>
<del>SWMU 001n</del>	<del>P 15 Mud Pit</del>
<del>SWMU 001o</del>	<del>Badger Unit Drilling Mud Pit(s)</del>
<del>SWMU 001p</del>	<del>Cotton Baby Drilling Mud Pit(s)</del>
<del>SWMU 001q</del>	<del>DOE 1 Drilling Mud Pit(s)</del>
<del>SWMU 001s</del>	<del>ERDA-9 Mud Pit</del>
<del>SWMU 001t</del>	<del>IMC-374 Mud Pit</del>
<del>SWMU 001x</del>	<del>WIPP 13 Drilling Mud Pit(s)</del>
<del>Storage Yard (1 SWMU)</del>	
<del>SWMU 004a</del>	<del>Portacamp Storage Yard, West Side</del>
<del>Evaporation Pond (1 SWMU)</del>	
<del>SWMU 007b</del>	<del>SW Evaporation Pond</del>

**TABLE 3**  
**AOCs INCLUDED IN THE PERMIT**

AOC NUMBER & (NAME)	RATIONALE FOR INCLUSION
<del>Drilling Mud Pits (6 AOCs)</del>	
001r (D-123)	<del>Presence of hazardous constituents not precluded, release potential to the soil medium is high.</del>
001u (IMC-376)	<del>Presence of hazardous constituents not precluded, release potential to the soil medium is high.</del>
001v (IMC-456)	<del>Presence of hazardous constituents not precluded, release potential to the soil medium is high.</del>
001w (IMC-457)	<del>Presence of hazardous constituents not precluded, release potential to the soil medium is high.</del>
001ac (DSP-207)	<del>Presence of hazardous constituents not precluded, release potential to the soil medium is high.</del>
001ae (IMC-377)	<del>Presence of hazardous constituents not precluded, release potential to the soil medium is high.</del>
<del>Mine Shaft Sumps (2 AOCs)</del>	
010b (Waste Handling Shaft Sump)	<del>Hazardous constituents have been released, the extent of release has not been determined.</del>
010c (Exhaust Shaft Sump)	<del>Hazardous constituents have been released, the extent of release has not been determined.</del>

**TABLE 4**  
**SWMUS/AOCS REQUIRING NO FURTHER ACTION**

<u>SWMU/AOC NUMBER</u>	<u>NAME</u>
<u>SWMU 001g</u>	<u>H-14/P-1 Mud Pit (s)</u>
<u>SWMU 001h</u>	<u>H-15/P-2 Mud Pit (s)</u>
<u>SWMU 001j</u>	<u>P-3 Mud Pit</u>
<u>SWMU 001k</u>	<u>P-4 Mud Pit</u>
<u>SWMU 001l</u>	<u>WIPP-12/P-5 Drilling Mud Pit(s)</u>
<u>SWMU 001m</u>	<u>P-6 Mud Pit</u>
<u>SWMU 001n</u>	<u>P-15 Mud Pit</u>
<u>SWMU 001o</u>	<u>Badger Unit Drilling Mud Pit(s)</u>
<u>SWMU 001p</u>	<u>Cotton Baby Drilling Mud Pit(s)</u>
<u>SWMU 001q</u>	<u>DOE-1 Drilling Mud Pit(s)</u>
<u>SWMU 001s</u>	<u>ERDA-9 Mud Pit</u>
<u>SWMU 001t</u>	<u>IMC-374 Mud Pit</u>
<u>SWMU 001x</u>	<u>WIPP-13 Drilling Mud Pit(s)</u>
<u>SWMU 004a</u>	<u>Portacamp Storage Yard, West Side</u>
<u>SWMU 007b</u>	<u>SW Evaporation Pond</u>
<u>AOC 001r</u>	<u>D-123 Mud Pit</u>
<u>AOC 001u</u>	<u>IMC-376 Mud Pit</u>
<u>AOC 001v</u>	<u>IMC-456 Mud Pit</u>
<u>AOC 001w</u>	<u>IMC-457 Mud Pit</u>
<u>AOC 001ac</u>	<u>DSP-207 Mud Pit</u>
<u>AOC 001ae</u>	<u>IMC-377 Mud Pit</u>
<u>AOC 010b</u>	<u>Waste Handling Shaft Sump</u>
<u>AOC 010c</u>	<u>Exhaust Shaft Sump</u>