

Steve Pullen

From: Diane.L.Dwire@us.mw.com
Sent: Thursday, March 08, 2001 10:57 PM
To: james_bearzi@nmenv.state.nm.us
Cc: stephanie_kruse@nmenv.state.nm.us; steve_pullen@nmenv.state.nm.us; Patrick.G.Corser@us.mw.com; delhart@cavemen.net; john_kieling@nmenv.state.nm.us



Section 4.doc

Mr. Bearzi,

Attached is the updated Section 4 of the Triassic Park Permit Application that was requested in your letter dated yesterday.

We would like to respond to several of the comments included in your letter as we believe they misrepresent the sequence of events regarding submittal of a final version of Section 4, Waste Analysis Plan. As you are aware, the final permit application that was submitted on October 6, 2000 had considered input from NMED and your technical review consultant (Techlaw) on Section 4. It was our understanding that this submittal addressed all of NMED and Techlaw's comments.

However, on January 30th NMED issued a letter citing requirements that needed to be provided by GMI in order to issue the permit, which included issues within Section 4. After considerable discussion with NMED to understand what changes were required to respond to these issues, GMI submitted a letter on February 14, 2001 indicating how we were planning to proceed to resolve these outstanding issues. GMI then followed with a draft version of the sections to be revised (including Section 4) via e-mail to NMED on February 21, 2001. NMED responded on February 26, 2001 with comments on the revisions and also indicated that other "major rewrites" to Section 4 had been made in the draft permit. The revision comments were incorporated immediately into the permit application. However, it was not until two days ago (March 6, 2001) that NMED suggested we make additional changes to Section 4 of the permit application to reflect your changes to the Sampling Plan. This is above and beyond any of the comments that were presented in your January 30th letter.

GMI and their design consultant have tried to be responsive to NMED in the development of the Draft Part B permit for the Triassic Park Facility. Therefore, we felt it was necessary to respond to the implications in your letter and your omission of any of the recent developments regarding Section 4.

(See attached file: Section 4.doc)

cc: Dale Gandy (via fax)
Ken Schultz (via fax)