



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
January 18, 2001



Steve Zappe, WIPP Project Leader
Hazardous Waste Permits Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo
Santa Fe, New Mexico 87505

Subject: Request of 60-Day Extension to the Module V, Section V.J.2.A Permit Reporting Requirement

Dear Mr. Zappe:

The purpose of this letter is to request a 60-day extension to the groundwater quality reporting requirements specified in Module V, Section V.J.2.a of the WIPP Hazardous Waste Facility Permit Number NM4890139088-TSDF.

According to Condition V.J.2.a, WIPP is required to provide to the Secretary, groundwater analytical results "sixty (60) calendar days after final sample is collected" for each sampling round.

As discussed in our meeting at the WIPP on January 10, 2001, the 60-day submittal requirement is problematic for WIPP due to the high total dissolved solids in the Culebra groundwater. Contract analytical laboratories have found it impossible to provide accurate, repeatable analytical result within the 60-day timeframe.

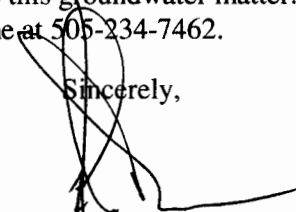
Therefore, the Carlsbad Field Office (CBFO) requests a 60-day extension to the Module V, Section V.J.2.a reporting requirement. If the extension is approved, the amended due date for the Round 11 WIPP groundwater data to the Secretary will be March 28, 2001.

The CBFO will be thoroughly evaluating the amount of time needed to perform the entire groundwater monitoring and reporting process. Each step will be systematically evaluated to determine, based on historical laboratory performance, realistic time frames for analyses and reporting.

Based on this thorough evaluation of the amount of time needed for the entire process, the CBFO will determine if a permanent extension of this time is needed. If so, an appropriate permit modification will be submitted to NMED.

Thank you again for meeting with us at the WIPP to discuss this groundwater matter. If you have any questions pertaining to this permit request, please contact me at 505-234-7462.

Sincerely,


H. L. Plum
RCRA Compliance Manager



Mr. Zappe

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cc:

J. Bearzi, NMED

J. Kieling, NMED

C. Walker, TechLaw