



**Department of Energy**

Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
April 2, 2003



Mr. Lindsay Lovejoy  
New Mexico Attorney General's Office  
PO Box Drawer 1508  
Santa Fe, NM 87504

Subject: Permit Modification Status

Dear Mr. Lovejoy:

I received an e-mail dated March 6, 2003 from Mr. Don Hancock asking about the status of planned permit modification requests (PMRs) for the Waste Isolation Pilot Plant, Hazardous Waste Facility Permit (HWFP). Mr. Hancock had also expressed his concerns to me in late 2002 that the submission of too many items in early 2003 could overload NMED's capabilities and the ability of the public to provide timely review of documents submitted. We have considered this information and have been planning accordingly. To operate our facility in an efficient and cost-effective manner, there are certain PMRs we must submit. We currently believe that we will submit six PMRs in late April 2003. These will likely include:

- Removal of HWFP reference to three underground booster fans;
- Inclusion of DAC for direct loaded TDOP, 85-gallon and 100 gallon drums;
- Removal of the PCB disposal prohibition from the HWFP, provided EPA issues its authorization for disposal of this waste in WIPP;
- Definition of characterization requirements for sealed sources;
- Authorization of the construction and use of Panels 4-10; and
- Removal of formaldehyde as a target analyte, for LANL homogenous waste.

A final decision has yet to be made regarding the actual PMRs to be submitted, but we believe that the above list represents the current facility needs.

Mr. Hancock was concerned about the public having an opportunity to review the PMRs and make comments to DOE prior to the PMR's being submitted to NMED. We intend to provide copies of these PMRs in final form to the public and NMED no less than 10 days prior to holding a pre-submittal meeting. After the meeting, we expect to make any appropriate changes to the PMRs, and within about 10 days formally submit the PMRs to NMED.

I would also like to take this opportunity to inform you we have decided to have a facilitator present at these meetings. We have asked Mr. Ted McAdam, who was the facilitator for the Site Specific Advisory Board Conference held in Carlsbad, January 30-February 1, 2003, to act as the facilitator. We were very impressed with the professional manner in which he conducted those meetings and have asked him to facilitate our meetings as well.



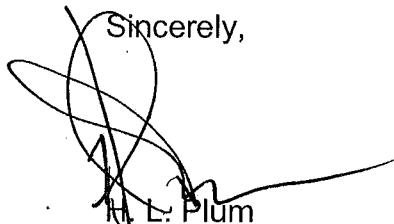
Mr. Lindsay Lovejoy

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I hope that I have addressed all of your questions and concerns. If you have any further questions, please contact me at (505) 234-7462 or by e-mail at [Jody.Plum@wipp.ws](mailto:Jody.Plum@wipp.ws).

Sincerely,

A handwritten signature in black ink, appearing to be 'H. L. Plum', written over the word 'Sincerely,'.

H. L. Plum

RCRA Compliance Manager

cc:

R. Curry, NMED

S. Zappe, NMED

J. Bearzi, NMED