



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



JUN 03 2005

Mr. James P. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



Subject: Comments on the 2004 Annual Unit Audit

Dear Mr. Bearzi:

The purpose of this letter is to affirm that the 2004 Annual Unit Audit was reviewed as requested by your letter dated April 25, 2005, enclosed. The review indicated that the information contained in your April 25, 2005, letter is correct. Since there were no additions or deletions in 2004, the fees stated in the enclosed letter are correct.

This office has notified the Hazardous Waste Bureau of the projected closure of Panel 2 in a letter dated May 19, 2005. Waste has begun being emplaced in Panel 3 during 2005. The Permittees request that the New Mexico Environment Department add the newly opened Panel 3 to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Table 2A, *SWMUS Not Requiring An RFI*, with the Unit ID Number SWMU 013e, and to Tables A, B, and C of the Annual Unit Audit in 2005. The Carlsbad Field Office (CBFO) also requests that Panel 2 be deleted from the Geologic Repository after panel closure, and included in the Post Closure Care portion of Tables A and C of the Annual Unit Audit.

In addition, a Petition for No Further Action concerning the 15 Solid Waste Management Units (SWMU) and eight Areas of Concern was sent to your Office in October of 2002. The determination of completeness of the No Further Action Petition was anticipated in 2004. The Permittees are awaiting the New Mexico Environment Department's decision on this matter.

If you have any questions please contact Mr. H. L. Plum at (505) 234-7462.

Sincerely,

Ines R. Triay
Acting Manager

Enclosure



State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

Telephone (505) 428-2500

Fax (505) 428-2567

www.nmenv.state.nm.us



BILL RICHARDSON
GOVERNOR



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 25, 2005

Mr. Richard Raaz, President
Washington TRU Solutions, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

Dr. Inés Triay, Acting Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

RE: REQUEST FOR COMMENTS ON CHANGES FOR THE ANNUAL UNIT AUDIT
FOR CALENDAR YEAR 2004

Dear Mr. Raaz and Dr. Triay:

Enclosed please find the calendar year 2004 draft Annual Unit Audit (AUA) tables developed pursuant to 20.4.2 NMAC for your facility. The New Mexico Environment Department (NMED) is providing a comment period for facility owners or operators to identify any changes that should be reflected in the AUA tables for calendar year 2004. The tables are formatted accordingly: 1) Table A includes all operating, closure, and post-closure care units; 2) Table B includes corrective action units (e.g. SWMUs); and 3) Table C is the summary of all units.

If your facility has operating unit(s) that did not manage hazardous waste for the entire 2004 calendar year, an affidavit must be provided to NMED affirming no such activity. In those cases NMED will not invoice the unit for the 2004 Annual Hazardous Waste Management Business Fee (AHWMBF). Please provide the affidavit with your comments by the close of business June 14, 2005.

Under the provisions of 20.4.2.201 NMAC the AUA is also used to determine the AHWMBF for your facility. **Do not** calculate and submit the AHWMBF based on these tables. An invoice will be mailed with the Final Annual Unit Audit on June 30, 2005.

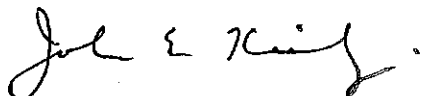
UNIQUE #	DOE UFC	DATE REC'VD	ADDRESSEES
0501878	2300.00	APR 29 2005	I. Triay C. Pipher R. Nelson K. Watson R. Chavez L. Price

J. Pipher
A. Holland
WEPF Operating Records

Draft 2004 Annual Unit Audit
April 25, 2005
Page 2

Should you have any questions concerning this letter or the Annual Unit Audit process please call me at (505) 428-2535.

Sincerely,



John E. Kieling
Manager
Permits Management Program

Enclosure

cc: J. Bearzi, NMED HWB
S. Zappe, NMED HWB
File: Reading and AUA 2004

TABLE A
Waste Isolation Pilot Plant Draft 2004 AUA
OPERATING, CLOSURE AND POST-CLOSURE CARE UNITS

Unit ID No.	Unit Type/Description	Process	Comments	Fee
013a	Container Storage-Waste Handling Building	S01-Container Storage		\$1,000.00
013b	Container Storage-Parking Area Unit	S01-Container Storage		\$1,000.00
013c	Disposal-Underground HWDU- Panel 1	X04-Geologic Repository		\$2,000.00
013d	Disposal-Underground HWDU- Panel 2	X04-Geologic Repository		\$2,000.00
Total Annual Fee:				\$6,000.00

TABLE B
Waste Isolation Pilot Plant Draft 2004 AUA
CORRECTIVE ACTION UNITS

Count	Unit ID No.	Unit Type/Description	Comments	Fee
1	001g	H-14/P-1 Mud Pit(s)		\$250.00
2	001h	H-15/P-2 Mud Pit(s)		\$250.00
3	001j	P-3 Mud Pit		\$250.00
4	001k	P-4 Mud Pit		\$250.00
5	001l	WIPP-12/P-5 Drilling Mud Pit(s)		\$250.00
6	001m	P-6 Mud Pit		\$250.00
7	001n	P-15 Mud Pit		\$250.00
8	001o	Badger Unit Drilling Mud Pit(s)		\$250.00
9	001p	Cotton Baby Drilling Mud Pit(s)		\$250.00
10	001q	DOE-1 Drilling Mud Pit(s)		\$250.00
11	001s	ERDA-9 Mud Pit		\$250.00
12	001t	IMC-374 Mud Pit		\$250.00
13	001x	WIPP-13 Drilling Mud Pit(s)		\$250.00
14	004a	Portacamp Storage Yard, West Side		\$250.00
15	007b	SW Evaporation Pond		\$250.00
			Total Annual Fee:	\$3,750.00

TABLE C
Waste Isolation Pilot Plant Draft 2004 AUA
SUMMARY OF UNITS AND FEE ASSESSMENT

Number of Units	Unit Type	Fee
2	Storage	\$2,000.00
0	Treatment	\$0.00
2	Disposal	\$4,000.00
0	Post Closure Care	\$0.00
15	Corrective Action	\$3,750.00
Total Annual Fee:		\$9,750.00