

**Allen, Pam, NMENV**

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**From:** Maestas, Ricardo, NMENV  
**Sent:** Thursday, October 11, 2012 2:32 PM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: Training Records Request

WIPP file

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**From:** Franco, Jose - DOE [mailto:Jose.Franco@wipp.ws]  
**Sent:** Wednesday, September 05, 2012 6:16 AM  
**To:** Kliphuis, Trais, NMENV; Sharif, Farok - WTS  
**Cc:** Kieling, John, NMENV; Davis, Jim, NMENV; Pullen, Steve, NMENV; Basabilvazo, George - DOE; Holmes, Steve, NMENV; Maestas, Ricardo, NMENV; Kliphuis, Trais, NMENV  
**Subject:** RE: Training Records Request

Trais Kliphuis

I followed up yesterday with George Basabilvazo and he ensured me that they would get you the information you need. He also said he would get in communication with you to verify the information we provide is what is being requested.

Thank you for working with us and if there are any concerns please let me know.

Joe Franco  
Carlsbad Field Office Manager

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**From:** Kliphuis, Trais, NMENV [mailto:trais.kliphuis@state.nm.us]  
**Sent:** Tuesday, September 04, 2012 4:30 PM  
**To:** Franco, Jose - DOE; Sharif, Farok - WTS  
**Cc:** Kieling, John, NMENV; Davis, Jim, NMENV; Pullen, Steve, NMENV; Basabilvazo, George - DOE; Holmes, Steve; Maestas, Ricardo, NMENV; Kliphuis, Trais  
**Subject:** Training Records Request  
**Importance:** High

Messrs. Franco and Sharif,

On December 13 and 14, 2011, the New Mexico Environment Department (NMED) conducted a hazardous waste compliance evaluation inspection and conditions of the hazardous waste facility permit inspection at the Waste Isolation Pilot Plant (WIPP). At that time, NMED requested several records that included documentation that training requirements are met. Those are:

Item 7 of the 2011 WIPP Inspection-Items: NMED Request Descriptions - Names of all individuals in the following positions: Hazardous Waste Workers, TRU Mixed Waste Handlers, Facility Shift Engineers, Facility Shift Mangers, Central Monitoring Room Operators, Radiographers (Level 1 and 2) Visual Examination Experts (Level 1 and 2), and Permittee's Management Representative. Provide 5% of the names to verify training and qualification are current.

We have also requested these records by phone on several occasions, most recently on Friday, August 31, 2012, but have not received them. We are anxiously awaiting this documentation so that we can complete our inspection. Also, please note that the June 26<sup>th</sup> email sent by staff was not reviewed or approved by management and should not be considered a solution.

As I am sure you know, Permit Condition 1.7.8. - Duty to Provide Information reads:

*"The Permittees shall furnish to the Secretary, within a reasonable time frame as specified by the Secretary, any relevant information which the Secretary may request to determine whether cause exists for modifying, suspending, or revoking this Permit, or to determine compliance with this Permit. The Permittees shall also furnish to the Secretary, upon request, copies of records required to be kept by this Permit. Information and records requested by the Secretary pursuant to this condition shall be provided in a paper or an electronic format acceptable to the Secretary. [20.4.1.500 and .900 NMAC (incorporating 40 CFR §§264.74(a) and 270.30(h))]"*

NMED understands that there has been concern regarding disclosure of email addresses or other information that may be covered by the Privacy Act of 1974 and suggests that DOE/WTS redact what information is necessary to comply with those laws but at the same time provide records as required by the WIPP permit.

Please provide the requested files by COB September 7, 2012. Electronic format is adequate.

Trais Kliphuis  
WIPP Staff Manager  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive E, Building 1  
Santa Fe, New Mexico 87505

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