1. Kickoff Meeting with A.T. Kearney (NMED/ATK) (June, 92)
   > develop contract agreement
   > establish NMED/ATK roles in the review process
   > set tentative meeting schedules between NMED/ATK
   > develop strategy for review of the WIPP Part B application

2. Meeting NMED/ATK (Late June, 92)
   > discuss findings of Administrative Completeness on Overview of the WIPP Part B Permit Application
   > establish technical review format

3. Review of Chapter B (NMED/ATK) (June-July, 92)
   > chapter B: addresses facility description
   > determine issues/concerns

4. NMED/ATK Meeting to discuss Chapter B NOD’s (August, 92)
   > discuss issues/concerns
   > develop NOD

5. NOD sent to DOE/WID (August, 92)
   > examples of items addressed:
     > identify units for which DOE is seeking a permit; specify where wastes are to be managed; additional requirements for Land disposal facilities; location information; floodplain standards; and, traffic information

6. Approximately five-week interactive period between NMED, ATK, and DOE/WID (Aug.-Sept., 92)
   > clarification and resolution of technical issues

7. NMED/ATK review DOE/WID NOD response (Sept.-Oct., 92)
   > determine adequacy of DOE/WID responses
   > define issues needing further clarification/explanation
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> examples of chapter I issues addressed: closure performance standards; partial and final closure activities; maximum waste activity; schedule for closure; time allowed for closure; closure procedures; inventory removal; and, disposal or decontamination of equipment structures and soils


> clarification/resolution of technical issues

15. NMED/ATK review DOE/WID response (Oct., 92)

> determine adequacy of DOE/WID responses

> define issues needing further clarification/explanation

16. Meeting to discuss all remaining Chapters (NMED/ ATK) (Oct., 92) (Chapters E, F, G, H, J, K, L, M)

> chapter E: addresses Groundwater Monitoring

> chapter F: addresses Procedures to Prevent Hazards

> chapter G: addresses RCRA Contingency Plan

> chapter H: addresses Personnel Training

> chapter J: addresses Corrective Action for Solid Waste Management Units

> chapter K: addresses Other Federal Laws

> chapter L: addresses No-Migration Determination

> chapter M: addresses Certification

> issues/concerns developed and incorporated into Information Request Letter

17. Information Request Letter sent to DOE/WID (Oct., 92)

> chapter E: example of information requested: a brief discussion why groundwater monitoring is not necessary at this time

> chapter F: examples of requested information: information on warning signs; general inspection requirements; monitoring of VOC's in bins in the waste handling
building; inspection of Type 2 bins; frequency of inspections; container inspections; miscellaneous unit inspections; aisle space requirements; unloading operations; runoff; personnel protection; releases to the atmosphere; prevention of reaction of ignitable, reactive, and incompatibly waste; general precautions for handling ignitable or reactive waste; and, management of ignitable or reactive waste in containers.

> chapter G: examples of information requested:
  identification of emergency coordinator (addresses, phone numbers); implementation of the contingency plan; emergency response procedures; identification of hazardous waste materials; assessment of the nature and extent of emergency; control, containment, and corrections of the emergency; storage and treatment of related materials and incompatible waste; post-emergency equipment maintenance; container spills and leakage; coordination agreements; and, evacuation procedures.

> chapter H: examples of information requested: job title/description information; content frequency and techniques in training; relevance of training to job position; and, training for emergency response.

> chapter J: examples of information requested: specifically addressed corrective action issues.

18. Approximately four-week interactive period (NMED, ATX, DOE/WID) (Oct.-Nov., 92)

> clarification/resolution of technical issues

19. NMED/ATX review DOE/WID response (Nov.-Dec., 92)

> determine adequacy of DOE/WID response

> define issues needing further clarification/explanation

20. Four (4) Public Comment Meetings Held by NMED. (Nov., 92)

> held in Santa Fe, Roswell, Las Cruces, and Raton

> afterwards NMED/ATX develops Executive Summary of Meetings

> Distribution of Summary to participants at the Public Comment Meetings

21. NMED requests submittal of Revision 2 of Part B by DOE/WID (Nov., 92)
22. DOE/WID submittal of Revision 2 (Nov., 92)
   > revision reflected information submitted as NOD/Request for Information Letters and results of clarification/resolution meetings held on technical issues

23. Review of Revision 2 of Part by NMED/ATK (Nov.-Dec., 92)
   > determine adequacy/completeness of DOE/WID response
   > define issues/inadequacies
   > develop final NOD

24. NOD on Revision 2 of Part B sent to DOE/WID (Dec., 92)

25. DOE Rev. 3 of the WIPP Part B Application Submitted to NMED (Jan., 93)
   > NMED forwards requested copies to concerned parties

26. NMED/ATK Strategy Meeting on developing the Draft Permit based on Rev. 3 of the WIPP Part B Application submitted by DOE/WID (March, 93)
   > set tentative schedule of ATK review/submittal to NMED
   > discuss development of permit modules
   > propose first meeting NMED/ATK

27. Request for Meeting by citizen groups (CCNS/SWI) (Jan., 93)

28. Meeting held between NMED (administrative and technical staff and CCNS/SWI (Jan., 93)
   > discussion of various technical and administrative issues/concerns, e.g., room stability; room closure rates; geochemical monitoring system; VOC emissions and "waste synergism"; VOC monitoring on bins; and, waste characterization
   > request from CCNS/SWI to meet again and include ATK

29. NMED request to DOE for additional funds to complete the review of Rev. 3 of the WIPP Part B Application (Jan., 93)
   > additional funds received (March, 93)
30. Meeting with NMED, ATK, CCNS/SWI (March, 93)

- discussion of technical issues/concerns NMED, ATK, CCNS/SWI e.g., waste identification; No Migration Determination conditions; VOC calculations by DOE/WID; wording in Rev. 3 concerning DOT substitution of 55-gallon drums; introduction of humidity into bins; geomechanical warning system reliability; roof support system evaluation; mine stability and ATK's credentials to review this issue; time frame for the removal of the bins; air ventilation system as discussed in the No Migration Determination; room milling operations; pressurization of the bins; management of liquid wastes; contingency plan versions; emergency rallying points; closure plan schedule; and, the waste analysis plan.

31. Review of Revision 3 by NMED/ATK (March- April, 93)

- determine adequacy of DOE/WID response
- determine if further information is required to be submitted by DOE/WID

32. Meeting between NMED/ATK to discuss Revision 3 (March-April, 93)

- determine completeness of response to NOD by Rev. 3
- develop Information Request Letter
- NMED/ATK begin developing draft of Modules for the draft permit

33. Information Request Letter sent to DOE/WID (April 13, 93)

- information requested: accountability of the audit program to address discrepancies in shipments, correct discrepancies and ensure changes are adequate, to return shipments during discrepancy to the generator if required; further clarification of humidity transfer/injection into bins; and, carbon canister dimensions and storage plans

34. DOE Response to NMED Request (April 19, 93)

- NMED request to DOE/WID to incorporate these changes in the Rev. 3 WIPP Part B Application (April, 93)
35. ATK submittal of all the draft modules to NMED for review (May, 93)
   > NMED reviews for completeness and regulatory concerns
   > NMED schedules meeting with ATK to discuss modules

NMED WIPP ACTIVITIES TO BE COMPLETED

36. Meeting NMED/ATK to review draft permit modules (late May, 93)
   > update timeline for final development of the draft permit
   > review timeline for hearing, etc.

37. ATK submits complete draft permit to NMED (June, 93)
   > NMED reviews for completeness and regulatory concerns

38. Meeting to review Complete draft permit (NMED/ATK) (June,)
   > set time for public notice and determine schedules for public hearings on the draft permit

39. Schedule Public Hearings at several locations in New Mexico and publish Notice of Public Hearings

40. Prepare Fact Sheet for Public Hearings (NMED/ATK)

41. NMED Distributes Draft Permit and Fact Sheet to public as required

42. Hold scheduled Public Hearings on Draft Permit

43. Receive Hearing Record and Prepare Responses to Comments (NMED/ATK)

44. Revise Draft Permit based on Hearings into Final Permit

45. Submit Final Permit to Secretary for decision or changes

46. Make any changes to the Permit requested by the Secretary

47. Resubmit Final Permit to Secretary for decision

48. Secretary's decision: Issue permit or Deny Permit

49. Act on Secretary's decision