



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
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Santa Fe, New Mexico 87502
(505) 827-2850

gover file copy
JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 21, 1994

Mr. George Dials, Manager
Carlsbad Area Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221.

Dear Mr. Dials:

RE: Estimated RCRA Permit Fees for WIPP

In the September 2, 1994, order concerning the Waste Isolation Pilot Plant (WIPP) draft permit, New Mexico Environment Department (NMED) Secretary Judith M. Espinosa withdrew and remanded the permit to NMED's Hazardous and Radioactive Materials Bureau (HRMB). The Secretary also ordered the Department of Energy (DOE) to submit a complete revised application that more accurately reflects future WIPP activities. Because of this order, HRMB will be charged with reviewing this revised application. HRMB will use an independent contractor for technical review support.

Attached is an itemized estimate of RCRA permit fees NMED intends to assess for processing the revised permit application for WIPP. The estimate is preliminary, but NMED does not anticipate any major changes in the amounts given. After a process for determining the application's completeness is agreed upon between DOE and HRMB, NMED proposes assessing this fee. NMED would however like to collect this fee in 1995, prior to contracting with an independent technical firm. Please advise me as to the acceptability of this proposal and any problems with tentative time frames.

If you need more information or wish to discuss this issue further, please contact Benito Garcia or Barbara Hoditschek of my staff at (505) 827-4308.

Sincerely,

Kathleen M. Sisneros
Director, Water and Waste Management Division

cc: Benito J. Garcia, HRMB
Barbara Hoditschek, HRMB

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ESTIMATES FOR WIPP PERMIT FEES

Costs cover the tentative entire proposed work period of 3 years and 4 months. Travel expenses are as follows: per diem, \$65/day, car expenses, 0.26/mile x 500 miles/trip = \$130/trip

ADMINISTRATIVE COSTS

<u>POSITIONS</u>	<u>TASK</u>	<u>RANGE OF HOURLY RATES/LINE ITEM</u>	<u>TIME/ITEM INVOLVED</u>	<u>COSTS</u>	
NMED Adm.	Monthly meetings In-house	33.327-15.492	240 hrs.	\$ 5,856	
	W/Facility		180 hrs.	\$ 4,392	
	RCRA WIPP Supervision		640 hrs.	\$15,616	
	Permit review		Draft	1600 hrs.	\$39,040
			Final	1600 hrs.	\$39,040
	Site visit		80 hrs.	\$ 1,952	
	Travel per diem	\$65/day	90 days	\$ 5,850	
	Car	\$130/trip	30 trips	\$ 3,900	
					<u>\$115,646</u>

TECHNICAL, LEGAL, CLERICAL COSTS

<u>POSITIONS</u>	<u>TASK</u>	<u>HOURLY RATE/LINE ITEM</u>	<u>TIME/ITEM INVOLVED</u>	<u>COSTS</u>
Program Mgr.	Permit process coordination	17.111	40 months	\$118,636
	Public info. meeting		120 hrs	\$ 2,053
	Public hearing		120 hrs	\$ 2,053
	Travel per diem	\$65/day	36 days	\$ 2,340
	Car	\$130/trip	12 trips	\$ 1,560

WIPP PERMIT FEES
Page 2

<u>POSITIONS</u>	<u>TASK</u>	<u>HOURLY RATE/ LINE ITEM</u>	<u>TIME/ITEM INVOLVED</u>	<u>COSTS</u>
Enviromental Specialist	Permit application tech.review	15.492	3465 hrs	\$53,680
	Pub. info meeting		120 hrs	\$ 1,859
	Pub. hearing		120 hrs	\$ 1,859
	Site visits		48 hrs	\$ 744
	Travel per diem	\$65/day	36 hrs	\$ 2,340
	Car	\$130/trip	12 trips	\$ 1,560
				<u>\$62,042</u>

<u>POSITIONS</u>	<u>TASK</u>	<u>HOURLY RATE/ LINE ITEM</u>	<u>TIME/ITEM INVOLVED</u>	<u>COSTS</u>
Geologist 3	Permit application tech. review	16.563	3,465 hrs	\$57,390
	Pub. info meeting		120 hrs	\$ 1,988
	Pub. hearing		120 hrs	\$ 1,988
	Site visits		48 hrs	\$ 795
	Travel per diem	\$65/day	36 hrs	\$ 2,340
	Car	\$130/trip	12 trips	\$ 1,560
				<u>\$66,061</u>

WIPP PERMIT FEES
 page 3

<u>POSITIONS</u>	<u>TASK</u>	<u>HOURLY RATE/ LINE ITEM</u>	<u>TIME/ITEM INVOLVED</u>	<u>COSTS</u>
Legal Counsel	Permit appl. review	65.0		
	Draft		320 hrs.	\$20,800
	Final		320 hrs.	\$20,800
	Public hearing		120 hrs.	\$ 7,800
	Travel per diem	65/day	16 days	\$ 1,040
	Car	130/trip	16 trips	\$ 2,080
				<u>\$52,520</u>
Hearing Officer	Public hearing	Reg. \$100/hr. O/T \$150/hr.	120 hrs. 60 hrs.	\$12,000 \$ 9,000
	Travel per diem	\$65/day	16 days	\$ 1,040
	Car	\$130/trip	16 trips	\$ 2,080
				<u>\$24,120</u>
Clerk	Public hearing & public meeting	Reg. \$50/hr. O/T \$75/hr.	120 hrs. 60 hrs.	\$6,000 \$4,500
	Travel per diem	\$65/day	16 days	\$1,040
	Car	\$130/trip	16 days	\$2,080
	Transcripts	5.75/page	2000pp.	\$11,500
				<u>\$25,120</u>

WIPP PERMIT FEES
Page 4

<u>POSITIONS</u>	<u>TASKS</u>	<u>HOURLY RATE/ LINE ITEM</u>	<u>TIME/ITEM INVOLVED</u>	<u>COSTS</u>
Secretary	Clerical support	9.108	1730 hrs.	\$15,757
				<u>\$15,757</u>
	ASD word processing charges	20,000/yr	40 months	\$66,000
				<u>\$66,000</u>
			SUBTOTAL	\$553,908
	Indirect costs	15.63%		\$86,576
			SUBTOTAL	\$640,484
CONTRACT COST FOR TECHNICAL REVIEW OF PERMIT APPLICATION BY SUBCONTRACTOR*				\$300,000
TOTAL				<u>\$940,484</u>

* Estimate based on work and costs previously incurred in a similar review