Activities Update for NMED's RCRA Permits Program

1. RCRA Part B Permit Application - Administrative Completeness
   - Conducted administrative completeness review prior to finalization of contract with A.T. Kearney.
   - HRMB issued a letter of determination of completeness to DOE on July 25, 1995.
   - Review did not address technical adequacy of application.

2. RCRA Part B Permit Application - Technical Review Method
   - HRMB established a revised schedule for technical review activities.
   - Alternative strategies suggested by contractor were either consecutive chapter reviews or simultaneous chapter reviews.
   - Settled on a "semi-simultaneous" review of multiple chapters, starting with the more substantial chapters and ending with less controversial chapters.
   - Continuing informal discussions with DOE, requesting clarifying information which provides iterative feedback during the technical review process.
   - Anticipate issuing a formal Notice of Deficiency (NOD) in mid-December for all unresolved issues.

3. Development of Draft Permit
   - Assuming no delays in DOE response to NOD, draft permit development to begin in mid-January.
   - Projected issuance of draft permit for public comment is mid-1996.
   - The impact of DOE submitting final No-Migration Variance Petition when draft permit issuance is scheduled is currently under study.
   - Remaining schedule is tenuous due to uncertainties surrounding public comment process (requests for public hearing, extension of comment period, etc).