

WIPP Quarterly Review

October 19, 1995



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).

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