

LANL/State Coordination Of WIPP Activities February 29, 1996



WIPP RCRA Part B Permit: Process, Schedule, & Status

1. RCRA Part B Permit Application

- Received WIPP Disposal Phase Part B Application, Revision 5, on May 26, 1995.
- Reviewed application and issued determination of administrative completeness July 25, 1995.
- Entered into a contract with A.T. Kearney to provide technical assistance to NMED.
- Performed phased technical review from September to December.
- Conducted informal discussions with DOE between October 26 and November 29.
- Issued requests for additional information to DOE November 2, 16, and 30.
- HRMB released a revised schedule (12/8/95) delaying all subsequent activities by two months, based upon a DOE request for further discussions.
- DOE submitted Revision 5.2 (six volumes) on January 17, incorporating comment responses and revisions to Part B permit application.
- Currently reviewing revised application and technical comments from contractor, developing items for a Notice of Deficiency (**NOD**).
- Will issue a formal NOD around March 8.

2. Development of Draft Permit

- Assuming no delay in DOE response to NOD, determination of technical adequacy and draft permit development to begin in early April.
- Projected issuance of draft permit for public comment is September or October 1996.
- Remaining schedule is tenuous due to uncertainties surrounding public comment process (requests for public hearing, extension of comment period, etc).

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WIPP RCRA Permitting Schedule

ID	Name	Duration	Sched Start	Sched End	1995												1996											
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
1	Receive Part B, Rev 5	0d	5/31/95	5/31/95	◆																							
2	Administrative Review	44d	5/31/95	7/31/95	▬																							
3	Finalize Technical Review Contract	23d	8/1/95	8/31/95	▬																							
4	Create Technical Review Schedule	5d	9/1/95	9/8/95	■																							
5	Technical Review	60d	9/1/95	12/7/95	▬																							
67	DOE Submit Revisions	31d	12/4/95	1/17/96	▬																							
76	NMED Evaluate DOE Final Response	23d	1/18/96	2/19/96	▨																							
77	Issue Technical NOD	0d	2/19/96	2/19/96	◆																							
78	Technical NOD Response	22d	2/20/96	3/20/96	▨																							
79	Develop Draft Permit	120d	3/21/96	9/4/96	▨																							
80	Public Notice/Comment	32d	9/5/96	10/18/96	▨																							
81	Public Meeting	1d	10/7/96	10/7/96																								
82	Respond to Public Not/Mtg Comments	22d	10/21/96	11/19/96	▨																							
83	Public Hearing(s)	22d	11/20/96	12/19/96	▨																							
84	Finalize Permit/Respond to Comment	75d	12/20/96	4/3/97	▨																							
85	Submit to NMED WWM Div. Director	0d	4/3/97	4/3/97	◆																							
86	Permit Review by Director	22d	4/4/97	5/5/97	▨																							
87	Permit Notice of Decision	23d	5/6/97	6/5/97	▨																							
88	Final Permit Decision	0d	6/5/97	6/5/97	◆																							

Notes to WIPP RCRA Permit Schedule:

- 1) Scheduled dates and durations are estimates as of 12/8/95
- 2) Duration days are working days, not calendar days.
- 3) Some activities may not occur (e.g., Public Hearings), but have been included for completeness. Other activities may occur more than once (e.g., Issue Technical NOD).
- 4) Some activities have relatively certain durations (e.g., Public Notice/Comment) due to regulatory requirements. Other activities have highly uncertain durations (e.g., NOD Responses) due to the initial adequacy of the application and the applicant's ability to fully respond in a timely fashion.

Project: WIPP RCRA Permit
Date: 12/8/95

Critical 
Noncritical 

Progress 
Milestone 

Summary 
Rolled Up 