



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lt. Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.env.nm.gov](http://www.env.nm.gov)



BUTCH TONGATE  
Cabinet Secretary - Designate

J. C. BORREGO  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

February 10, 2017

Todd A. Shrader, Manager  
Carlsbad Field Office  
Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3090

Philip J. Breidenbach, Project Manager  
Nuclear Waste Partnership, LLC  
P.O. Box 2078  
Carlsbad, New Mexico 88221-2078

**RE: LABORATORY PROFICIENCY TESTING PLAN APPROVAL  
WASTE ISOLATION PILOT PLANT  
EPA I.D. # NM4890139088**

Dear Messrs. Shrader and Breidenbach:

On May 2, 2016 the New Mexico Environment Department (NMED) received a Class 1 Permit Modification Notification (Class 1) to the WIPP Hazardous Waste Facility Permit (Permit). The Class 1 was dated April 27, 2016 and was submitted by the Department of Energy's Carlsbad Field Office (CBFO) and Nuclear Waste Partnership, LLC (NWP) (collectively the Permittees). Item two of the Class 1 was included to "Add Option for VOC Contract Laboratory Proficiency Testing in Part 4 and Attachment N." The specific language in Part 4 and Attachment N states:

*Part 4, Section 4.6.2.1: "The Permittees shall implement repository VOC monitoring and the Laboratory Performance Evaluation Plan (LPEP) or proficiency testing as specified in Permit Attachment N (Volatile Organic Compound Monitoring Plan) and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.602 and §264.601(c))."*

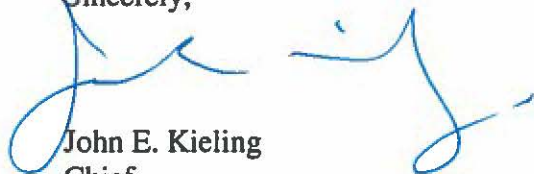
*Attachment N, Section N-5e: "As an alternative to the LPEP, the Permittees will notify the Secretary of their intention to require the contract laboratory to participate in proficiency testing. The Permittees will then, within 90 days, submit to the NMED for approval, a proposal for proficiency testing. If the Permittees are unable to develop a proficiency testing plan that is acceptable to the NMED, then the Permittees*

*will prepare and submit the LPEP. The proposal for proficiency testing will include the following as applicable: Specific analytical method(s); Schedule for proficiency testing implementation; Provision for the periodic reporting of proficiency testing results and corrective actions, if any. Results of proficiency testing will be reported in the Semi-Annual VOC Monitoring Report as specified in Permit Part 4, Section 4.6.2.2.”*

On May 2, 2016 the Permittees notified NMED of their intention to participate in proficiency testing for demonstration of laboratory performance. On July 26, 2016 the Permittees submitted their Laboratory Proficiency Testing Plan (PT Plan) for NMED review and approval. The PT Plan describes how the Permittees have identified low concentration proficiency testing provided by a laboratory contracted directly with the U.S. Environmental Protection Agency and that the program is part of the National Air Toxics Trends Station (NATTS) Program which monitors low concentration VOCs in ambient air across the United States. The PT Plan includes the following sections: Introduction, Background, Scope and Objectives, Schedule, Analytical Methodologies, Quality Assurance Requirements, Result Evaluation, Non-conformance, Reporting, and Plan Modification.

NMED has reviewed and hereby approves the PT Plan submitted on July 26, 2016. The Permittees will submit to NMED the Permittees' analytical laboratory proficiency testing results for the first two NATTS program rounds as required by Section 8, *Reporting*, of the PT Plan. This includes the results obtained prior to the approval of this plan. The analytical laboratory's proficiency testing results will be submitted to NMED in the Semi-Annual VOC Monitoring Report as specified by the PT Plan and Permit Part 4, Sections 4.6.2.1 and 4.6.2.2 and Permit Attachment N, Section N-5e. Should you have any questions regarding this matter, please contact Ricardo Maestas, at (505) 476-6050.

Sincerely,



John E. Kieling  
Chief

Hazardous Waste Bureau

cc: R. Maestas, NMED-HWB  
D. Biswell, NMED-HWB  
S. Lucas-Kamat, NMED-DOE-OB  
L. King, EPA Region 6  
T. Peake, EPA ORIA  
G. Basabilvaso, DOE CBFO  
Reading and File: WIPP 2017