



State of New Mexico
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

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

BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 1, 2017

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

Bruce C. Covert, Project Manager
Nuclear Waste Partnership, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

RE: REQUEST FOR EXTENSION OF TIME TO PERFORM ANNUAL RECERTIFICATION AUDIT OF THE ADVANCED MIXED WASTE TREATMENT PROJECT, AUDIT A-18-04 WASTE ISOLATION PILOT PLANT EPA I.D. NUMBER NM4890139088

Dear Messrs. Shrader and Covert:

On November 20, 2017, the New Mexico Environment Department (NMED) received a Request for Extension of Time (Request), in a letter dated November 15, 2017 that was submitted by the Department of Energy Carlsbad Field Office (CBFO). The Request seeks an extension of time to perform the annual recertification audit of the Advanced Mixed Waste Treatment Project (AMWTP), Audit A-18-04, from December 2017 to spring 2018.

This request was submitted pursuant to Part 1, Section 1.10.3 of the Hazardous Waste Facility Permit (Permit) which states:

“The Permittees may seek an extension of time in which to perform a requirement of this Permit, for good cause, by sending a written request for extension of time and proposed revised schedule to the Secretary. The request shall state the length of the requested extension and describe the basis for the request. The Secretary will respond in writing to any request for extension following receipt of the request. If the Secretary denies the request for extension, reasons for the denial will be stated.”

The CBFO submitted the Request regarding the condition in Permit Attachment C6, Section C6-3, which states:

“Audits will be conducted at least annually for each site involved in the waste characterization program.”

According to the Request the extension, if granted, would direct the AMWTP audit be scheduled and completed no later than April 2018. The reason for this Request, as submitted, is based on the time needed to address issues related to the implementation of the Enhanced Acceptable Knowledge (AK) process by AMWTP for multiple summary category groups. The Request goes on to state that NMED approval of the Request will help ensure the applicable requirements are met. NMED is aware that the CBFO is planning to conduct a surveillance of the Enhanced AK process at AMWTP in December and that the results of this surveillance will help determine the final schedule for the recertification audit.

NMED hereby grants the Request and directs that CBFO complete the annual recertification audit of the AMWTP, Audit A-18-04, no later than April 30, 2018. CBFO will notify NMED once the recertification audit has been scheduled per Permit Part 2, Section 2.3.2.2. If 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
H. Tellez, NMED HWB
S. Lucas-Kamat, NMED DOEOB
L. King, EPA Region 6
T. Peake, EPA ORIA
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