



National Nuclear Security Administration

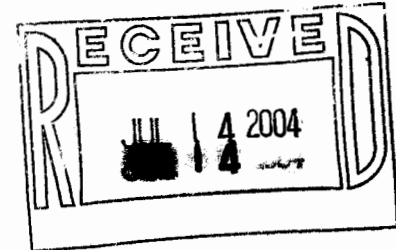
Sandia Site Office
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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Sent 7-13-04

Mr. James Bearzi, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. East, Bldg 1
Santa Fe, NM 87505



Dear Mr. Bearzi:

The purpose of this letter is to request an extension to the 60-day response deadline specified in Notice of Deficiency #3, Task HWB-SNL-02-002.

On June 29, 2004, the U.S. Department of Energy (DOE) and Sandia Corporation (Sandia) received NOD #3 in New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) Task HWB-SNL-02-002. The Notice of Deficiency includes a set of 83 comments that list the issues DOE/Sandia should address more fully and the additional information that DOE/Sandia should provide to NMED to complete the permit renewal application for Sandia National Laboratories (SNL) (EPA ID No NM5890110518).

The NOD provides a deadline of 60 calendar days for providing the information; it also states that the New Mexico Environment Department (NMED) may consider a petition for a deadline extension.

DOE/Sandia request an additional 90 days to respond to all the comments for several reasons:

- Interrelated nature of the comments. The 83 comments address most sections of the permit request, and each section is affected by multiple comments. Because most sections of the permit request will require revision, DOE/Sandia believe it would be more constructive to make a single submittal that incorporates all the revisions (see following item) rather than submitting in phases that may require revision of certain sections more than once for correlation with a more recent response.
- Improvement of process used in previous NOD response. In order to respond to the 524 comments included in NOD #1, DOE/Sandia grouped the comments by topic and provided three responses. Responding to the comments required extensive revisions to most sections of the permit request, and grouping the comments allowed personnel to identify and focus on the various topics. However, the approach resulted in submittal of many sections of the permit request twice: once to address some comments, and again to address the remaining comments. It also increased the effort required on the part of DOE/Sandia (document production) and NMED (document review). DOE/Sandia wish to provide a single set of responses and revisions in response to NOD #3 to eliminate additional and unnecessary effort.



- Modification of the Radioactive and Mixed Waste Management Facility (RMWMF), described in Module III. DOE/Sandia intend to modify the RMWMF to accommodate the existing RMWMF operations and additional waste storage and packaging operations that are currently conducted at the Hazardous Waste Management Facility (HWMF). The modified facility will be called the Consolidated Waste Management Facility (CWMF). Design efforts are underway, and much of the design is scheduled to be completed by September 30, 2004. The information needed to complete the revisions to Module III will not be available until the design is completed. DOE/Sandia will incorporate revisions to address the comments in NOD #3 that are related to the existing HWMF.
- Complexity of the comments. Comments 1-47 (primarily regarding waste characterization) are complex comments prepared by NMED staff over the past 14 months. DOE and Sandia cannot adequately address them in 60 days.

DOE and Sandia are available to provide additional information as needed. If you have any questions regarding this submittal, please contact David Rast of my staff at (505) 845-5349.

Sincerely,



Patty Wagner
Manager

cc
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SNL ISS Records Center, MS 0651, 9612
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