Mr. Steve Zappe, Hazardous Waste Permits Program Manager  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galestio Street  
Santa Fe, NM  87505

Subject: Carlsbad Area Office Monthly Nonconformance Report

Dear Mr. Zappe:

The purpose of this letter is to submit the Carlsbad Area Office (CAO) Monthly Nonconformance Report Summary for the period of July 23 through August 23, 2000. The summary is transmitted per the requirement contained in the WIPP Hazardous Waste Permit, Attachment B3, section titled, Nonconformance to DQOs.

Please contact Sam Vega of my staff at (505) 234-7423 if you have any questions or concerns.

Dr. Inés R. Triay  
Manager

Enclosure

cmp: w/o enclosure  
J. Kieling  
J. Bearzi

CAO-QA-LC: 00-0863  UFC 1000
MONTHLY SUMMARIZATION REPORT
FOR
SITE-GENERATED NONCONFORMANCE REPORTS
July 23 – August 23, 2000

This summary is submitted in compliance with the requirements of the WIPP Hazardous Waste Permit, Attachment B3, Section titled, *Nonconformance to DOOs*.

During the period of July 23, 2000 through August 23, 2000 there were two nonconformance reports generated. Both reports were identified by Idaho National Engineering and Environmental Laboratory (INEEL), a TRU waste generator site.
<table>
<thead>
<tr>
<th>Assigned NCR Number</th>
<th>Responsible Organization</th>
<th>Date Notified</th>
<th>Date NCR Received</th>
<th>Date Closed</th>
<th>Deficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site NCR Number</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>ID</td>
<td>08/07/2000</td>
<td>08/09/2000</td>
<td></td>
<td>1 lb of bulk lead was identified in an IDC 300 drum. See RTR000036, Drum IDRF001211089. This will require the addition of a HWN to this container for lead. Requirement Violated: MCP-2988; Step 4.4.3 requires that the AKE initiate an NCR if a waste matrix code or HWN change is required for a specific subset of drums within a waste stream. Actions:</td>
</tr>
<tr>
<td>13744</td>
<td>S. Hailey</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>ID</td>
<td>08/08/2000</td>
<td>08/09/2000</td>
<td></td>
<td>Drum IDRF001212349 (IDC 300) has a headspace gas concentration of 2000 ppm 1,1,1-Trichloroethane. This is more than an order of magnitude higher than has been seen for this waste stream. An evaluation needs to be conducted to determine if a hazardous waste code should be added to this drum. Requirement Violated: MCP-2988; Step 4.4.3 requires that the AKE initiates an NCR if a waste matrix code or HWN change is required for a specific subset of drums within a waste stream. Actions:</td>
</tr>
<tr>
<td>13759</td>
<td>S. Hailey</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>