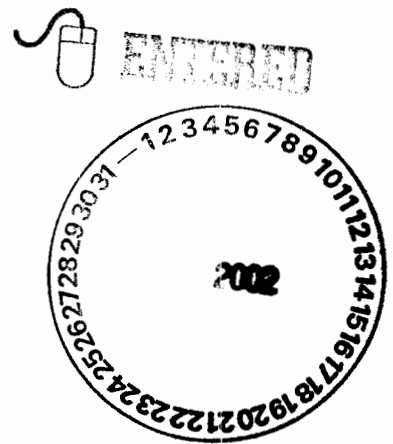




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
April 4, 2002



Mr. Steve Zappe, Project Leader (WIPP)
Hazardous Waste Permits Program
Hazardous Waste Bureau
New Mexico Environment Department
2909 E. Rodeo Dr. Bldg 1
Santa Fe, New Mexico 87502-6303

RE: Request for Time Extension to Implement the February 25, 2002 Revised
Hazardous Waste Facility Permit Language

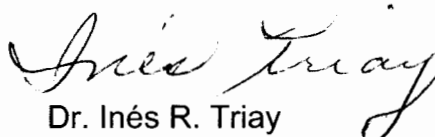
Dear Mr. Zappe:

The purpose of this letter is to request an extension of time to June 1, 2002 to implement several of the Class 1 Permit Modifications in the February 25, 2002 revisions to the WIPP Hazardous Waste Facility Permit (HWFP) as indicated in Enclosure 1. These modifications were different than those submitted in our July 21, 2000 permit modification notice and will result in changes to generator and storage site implementation documents. The revisions are included in Enclosure 2.

We estimate the process of updating these documents will require about 90-days. This extension will provide generator sites time to update their program documents and to allow for comprehensive CBFO review and approval of the changes.

If you have any questions regarding this request for a time extension to implement the February 25, 2002, Class 1 Permit Modifications, please contact Mr. Jody Plum at (505) 234-7462 or me at (505) 234-7300.

Sincerely,


Dr. Inés R. Triay
Manager

Enclosure

Enclosure 1



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567

www.nmenv.state.nm.us



PETER MAGGIORE
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 2002

Post-it* Fax Note	7671	Date	# of pages
To	Dele Burrell	From	Steve Zapp
Co./Dept.	WTS	Co.	NMED
Phone #	505 234-7545	Phone #	505 428-2517
Fax #	234-7113	Fax #	428-2567

Dr. Inés Triay, Manager
Carlsbad Field Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221-3090

Mr. John Lee, General Manager
Westinghouse TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: ADMINISTRATIVE COMPLETENESS DETERMINATION, CLASS I NOTIFICATIONS
WIPP HAZARDOUS WASTE FACILITY PERMIT
EPA I.D. NUMBER NM4890139088**

Dear Dr. Triay and Mr. Lee:

The New Mexico Environment Department (NMED) acknowledges receipt of numerous notifications of Class 1 permit modifications to the WIPP Hazardous Waste Facility Permit. NMED reviewed the following documents for administrative completeness:

- Notification of Class 1 Permit Modifications, Dated 7/21/00, Rec'd 7/25/00
- Notification of Class 1 Permit Modifications (B6 Checklist), Letter Dated 5/25/01, Rec'd 5/29/01
- Notification of Class 1 Permit Modifications (General Manager, etc.), Letter Dated 6/28/01, Rec'd 7/2/01
- Notification of Class 1 Permit Modifications Updating Emergency Coordinator List, Letter Dated 10/26/01, Rec'd 10/29/01
- Notification of Class 1 Permit Modifications, Letter Dated 2/7/02, Rec'd 2/8/02

NMED has reviewed these documents and determined that they are administratively complete. With the exceptions of those modifications identified in Attachment 1 as being

Dr. Inés Triay
Mr. John Lee
February 25, 2002
Page 2

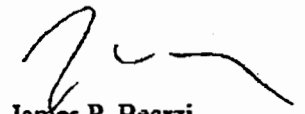
either withdrawn, rejected, or accepted with changes, all other modifications identified in the Notices of Class 1 Modification listed above have been put into effect as requested by the Permittees under the conditions specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.42(a)(1)).

NMED notes that the July 21, 2000 modification was undoubtedly the most difficult Class 1 modification to implement of all modifications submitted by the Permittees to date. It required extensive time and resources to review and incorporate into the Permit, far beyond what would be expected of a typical Class 1 modification. The volume of comments in the Attachment attests to the complexity of this modification. However, NMED hopes the Permittees now have a much clearer understanding of how permit modifications are classified under 20.4.1.900 NMAC (incorporating 40 CFR §270.42), and that notification of this magnitude will not be submitted as a Class 1 modification in the future.

The New Mexico Hazardous Waste Fee Regulations require assessment of fees when administrative review of a document is complete, as specified in 20.4.2.301 NMAC. NMED will issue an invoice to you under a separate letter. Payment is due within sixty (60) calendar days from the date that you receive the invoice.

If you have any questions regarding this matter, please contact Steve Zappe at (505) 428-2517.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

Attachment

cc: Greg Lewis, NMED WWMD
Steve Zappe, NMED HWB
Cindy Abeyta, NMED HWB
Laurie King, EPA Region 6
Connie Walker, TechLaw
File: Red WIPP '02

NMED General Comments Regarding Class 1 Permit Modifications

July 21, 2000 Notice of Class 1 Permit Modifications

- Item 1.a.3** The inserted paragraph was written to mandate that the Waste Stream Characterization Package include the Waste Stream Profile Form (WSPF), the Characterization Information Summary (CIS), and complete AK summary, to be consistent with Section B3-12b(2). The last sentence was also edited to reflect requirements in Section B3-12b(2).

The acronym for Waste Stream Profile Form was also introduced here, and every subsequent reference to it was replaced by the acronym WSPF.

- Item 1.a.5** The proposed elimination of items in the information list for contents of the WSPF was compared to the list in Item 1.c.18. Certain items were subsequently added to Section B3-12b(1).

A minor editorial change was made to the inserted paragraph, so that it reads, "As stated in the Introduction of this WAP..." to be consistent with the rest of the Attachment.

- Item 1.a.7** The proposed language to the first paragraph of Section B-4 was not modified from the correct version of the Permit. Only the word "that" was inserted in the first sentence, while other changes to the rest of the paragraph were as requested.

- Item 1.a.9** References to Permit Attachment B6 were not changed (i.e., the language "specified in Permit Attachment B6" was retained).

- Item 1.a.1** According to convention in the Permit, citations to specific sections in an attachment appear as "Section B3-X", while citations to entire attachments appear as "Permit Attachment B3".

The final paragraph suggested for insertion in Section B-4a(6) was completely new, not existing as presented in the modification. This new paragraph was inserted following the large section of the first paragraph that was struck. The correct reference for this document is (DOE, 2001), and has been added to the list of references in the WAP in Section B-5.

The paragraph regarding submittal of the WSPF has been edited to include information contained in the struck portions of the first paragraph, clarifying that the WSPF, the CIS, and information from the WWIS will be used as the basis for acceptance of waste characterization information.

Item 1.a.13 The word "WIPP" was replaced with "Permittee" to avoid ambiguity over definition of who performs the waste screening in Section B-4b.

Item 1.a.14 In the first paragraph of Section B-4b(1), the proposed struck language including verification of the waste stream characterization summary report package completeness as part of Phase 1 activities. The language was edited to state that this process includes "verification that all of the required elements of the Waste Stream Profile Form and the Characterization Information Summary are present..."

The third paragraph struck the requirement for the Site Project Manager to verify that waste stream characterization meets applicable WAP requirements, as well as the prohibition on management, storage, or disposal of such waste at WIPP. This language has been retained with minor revision to keep it consistent with the rest of the modification.

The fifth paragraph (dealing with the WWIS) apparently attempts to eliminate requirements for consideration of WWIS information in evaluating the WSPF, which is not within the realm of a Class 1 modification. Such language as was in the original Permit has been retained.

In the sixth paragraph, language was proposed that would add that the waste stream would not be approved "for disposal." This language was apparently part of an earlier proposal (central characterization) that would distinguish between waste characterization requirements for storage versus disposal. The Permit makes no such distinction, and this language was not incorporated.

Item 1.a.15 By definition, all edit/limit checks in the WWIS are applicable, thus adding the word "applicable" is redundant and may cause confusion. This change was not made.

Under the Waste Container Data Report bullet, the reference to Table B-8 was retained because it contains the relevant requirements for the report.

Item 1.a.16 The definition of the acronym "CBFO" was added to the opening paragraph.

Although the modification didn't indicate the presence of the paragraph starting with "Waste data transferred via the WWIS after WSPF approval", this paragraph has been retained.

- Item 1.c.3 The second paragraph in B3-10 proposed adding the phrase "in either electronic or hard copy format" for Batch Data Reports. This language is beyond the scope of a Class 1 modification and was not incorporated.

The paragraph dealing with raw analytical data proposed language saying it would be readily available for review "when requested by the Permittees." This language is too restrictive, since the data should be available to any party reviewing the Analytical Batch Data Report. The phrase has been changed to read "upon request."

The new statement regarding On-line Batch Data Reports was made a bulleted item to retain consistency with the rest of this section.

- Item 1.c.4 The phrase regarding analytical raw data stating "however, it need not be included in the Batch Data Report" was deleted from this section, since it is irrelevant to the data generation level reviewer and potentially created confusion.

- Item 1.c.5 The global caveat "as applicable," referring to the bulleted items the independent technical reviewer must ensure, was overly vague and not included. All bulleted items are required.

The first bullet proposed eliminating the requirement to ensure the correct number of significant figures was used in reporting is rejected. Incorrect use of significant figures or incorrect rounding protocols can impact the use of project data and subsequent project decisions.

- Item 1.c.6 The global caveat "as applicable," referring to the bulleted items the independent technical reviewer must ensure, was overly vague and not included. All bulleted items are required.

The phrase "as applicable" in the third bullet appears problematic. This item was edited to read in the same manner as the bullet under Independent Technical Review.

- Item 1.c.7 The global caveat "as applicable," referring to the bulleted items the independent technical reviewer must ensure, was overly vague and not included. All bulleted items are required.

- Item 1.c.9 The global caveat "as applicable," referring to the bulleted items the independent technical reviewer must ensure, was overly vague and not included. All bulleted items are required.

The first bullet proposed eliminating the requirement to ensure the correct number of significant figures was used in reporting is rejected. Incorrect use of significant figures or incorrect rounding protocols can impact the use of project data and subsequent project decisions.

Item 1.c.10 Rather than delete the third bullet under the responsibilities of the Site Project Manager, this bullet was edited to be identical to the same bullet under the Site Project QA Officer's responsibilities.

Item 1.c.11 The proposed change in the first paragraph of new section B3-10b(3) would allow the QA Officer Summary and Data Validation Summary to be "incorporated into the Site Project QA Officer and Site Project Manager checklists." This language is unclear as to whether the summaries would simply be checklist items instead of a report. The language has been changed to state, "These reports may be combined to eliminate redundancy, and may be included with the Site Project QA Officer and Site Project Manager checklists."

Further requirements were imposed here that were deleted in Item 1.a.11 from the first paragraph in Section B-4a(6), such as including all waste container numbers, referencing nonconformance reports if necessary, and including signature releases.

Item 1.c.13 The proposed change in the first paragraph of Section B3-10c would reduce the scope of the Permittees' review of Batch Data Reports to those evaluated during an audit at the generator/storage site. The proposed change also eliminates specific completeness elements that must be evaluated, but does not proposed alternative information that must be checked for each batch report. This does not meet the intent of a Class 1 modification, and is therefore rejected. If the Permittees wish to pursue this modification, it is better suited to the Class 2 process.

The proposed change also included new language discussing the method for WSPF approval, apparently limiting the verification of the actual form to the initial WSPF submittal. The language has been changed to require this verification for each WSPF submitted for approval. The language regarding use of limit checks in the WWIS for subsequent shipments has been made part of the verification, requiring the Permittees to review the WSPF each time it is submitted, either for initial approval or for revision approval.

Item 1.c.14 The parenthetical phrase, "(if applicable)," has been moved to the beginning of the section before the bullets, and stated, "as applicable."

Also, the phrase "waste stream profile form" has been replaced by the previously defined acronym "WSPF".

- Item 1.c.15 As in Item 1.c.13, the proposed language limits data reconciliation by the Permittees to review of original WSPFs and items evaluated during audits at generator/storage sites. Again, this does not meet the intent of a Class 1 modification, and is therefore rejected. If the Permittees wish to pursue this modification, it is better suited to the Class 2 process.
- Item 1.c.16 The second paragraph included language that eliminated the requirement that Batch Data Reports be forwarded to the Site Project Manager. This is inconsistent with Section B3-10b(2), and so the original language has been retained.
- Item 1.c.17 The initial paragraph was rearranged to mention the WSPF first, followed by the CIS and Waste Stream Characterization Package. This improves the logical flow of information. Also, the statement regarding where summarized data are included was changed to reference the CIS, not the WSPF.

The second paragraph, which was reduced to a single sentence in the proposed modification, was rewritten to retain more of the original language, simply replacing "Summarized testing, sampling, and analytical data" with "Waste Stream Characterization Package."

- Item 1.c.18 Broke the new section for WSPF and CIS into two separate sections, renumbering each successive section as appropriate.

For the WSPF, added items deleted from Section B-1d that should still appear on the WSPF, such as original generator of waste stream, description of waste stream, the waste stream WIPP ID number, a listing of the acceptable knowledge documentation, and a listing of the waste characterization procedures.

For the CIS, rearranged the order of bullets and added a bullet for totals analysis to reflect what is currently provided in the CIS. NMED expanded the overly broad list of AK summary information to reflect what is currently provided in the AK summary report accompanying the CIS. Also defined the acronym AK as acceptable knowledge, and spelled out radiography and visual examination.

Relocated the concluding paragraph to become the second paragraph in Section B3-12b.

- Item 1.c.19 Incorporated with minor editorial changes for consistency between sections, and to reference section for the WSPF, CIS, and AK summary.
- Item 1.c.22 On Table B3-11, made the reporting of "indication of vented rigid liners" a required element of radiography batch reports. Under "description of container contents" revised the comment to require providing enough detail to identify all discernible waste items, etc. Under "operator signature and date of test" revised the comment to clarify that the signatures of both operators are required for visual verification. Under "signature of visual examination expert and date" deleted the comment since there are no circumstances in which the VEE would not be required to sign the report. Under "data review checklists" add the comment that all data review checklists will be identified.
- Item 1.c.23 On Table B3-12, made the reporting of "sample location" a required element. Made "drum age", "equilibration time", "verification of rigid liner venting", and "verification that sample volume taken is small in comparison to the available volume" all required element of HSG sample reports. Under "data review checklists" add the comment that all data review checklists will be identified.
- Item 1.c.24 On Table B3-13, made "holding time", "date and time analyzed", and "TIC evaluation" all required elements. Made "operator signature and analysis date" a required element. Under "data review checklists" add the comment that all data review checklists will be identified.

May 21, 2001, Notification of Class 1 Modifications

This modification was a complete replacement of the checklists in Permit Attachment B6 (i.e., the "B6 checklists"). NMED made changes to the following checklist items to bring them into conformance with the Permit as modified:

- Item 4 The statement regarding assignment of a Waste Stream WIPP Identifier was deleted in Permit Attachment B. The requirement was moved to Permit Attachment B3, Section B3-12b(1). Checklist Item 4 has been revised to reflect the new reference.
- Item 6 References to USEPA were changed to EPA to remain consistent with usage elsewhere in the Permit.
- Item 36 Change reference to Section B3-10a.

NMED General Comments

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- Item 37 Add missing reference to Section B3-10a(1).
- Item 38 Change reference to Section B3-10a(2).
- Item 39 Change reference to Section B3-10a(3).
- Item 40 Change reference to Section B3-10b(2).
- Item 41 Change reference to Section B3-10b(1).
- Item 42 Change reference to Section B3-10b.
- Item 42 For the QA Officer Summary, the requirement to include the validation checklist on a waste container basis was removed to be consistent with the Permit. Also, change reference to Section B3-10b(3).
- Item 49 The statement requiring procedures for data transmittal from Level 1 to Level 2 are not in the Permit. This item was deleted, but the blank row was retained.
- Item 51a Change reference to Section B3-12b(4).
- Item 54 The requirements for this item were originally specified in Section B-4a(6), not Sections B3-10 or B3-12. However, the language in B-4a(6) was deleted, and orphaned requirements were incorporated into Section B3-10b(3). This item was deleted, but the blank row was retained.
- Item 56 For the list of required elements for the Waste Stream Profile Form, the language from Section B3-12b(1) was directly pasted into the checklist.
- Item 56a For the list of required elements for the Characterization Information Summary, the language from Section B3-12b(2) was directly pasted into the checklist.
- Item 57 The requirements for this item were originally specified in Section B-4a(6), which was subsequently deleted. The orphaned requirements were incorporated into Section B3-10b(3). This item was deleted, but the blank row was retained.
- Item 61 This requirement for completing a Waste Stream Profile Form was incorrectly referenced. The correct reference to Section B3-12b was added. Also, the requirement is for the site project office, not the Site Project Manager.

NMED General Comments

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- Item 62 This item incorrectly referenced Section B3-12b(1), in addition to correctly referencing Section B-4a(6). The incorrect reference was deleted.
- Item 65 Section B-4a(7) was revised to identify "analytical records", not "analytical QA data". The Item was edited to reflect this.
- Item 73 Changed reference to Section B-4b(2).
- Item 78 Changed acronym from CAO to CBFO.
- Item 80 Changed reference to Section B2-2a.
- Items 90, 91 Renumbered as Items 89 and 90. Applied the number 91 to the blank item on the following page.
- Item 123 Changed reference to Section B-3a(3).
- Item 124 Section B1-4 was revised to change the situations governing requirements for laboratories to maintain sample custody. Language in this Item was modified to reflect this change.
- Item 170 Add reference to Section B4-3f.
- Item 214 Same edit as Item 124 above.

June 28, 2001, Notification of Class 1 Modifications

- Item 1.a.1 This proposed language was incorporated with the exception of the phrase "elements of" when referring to how the Contingency Plan is triggered.
- Item 1.a.2 The Permittees withdrew this item in a letter dated September 26, 2001
- Item 1.a.3 The Permittees withdrew this item in a letter dated September 26, 2001.
- Item 1.a.5 The item on Table F-6, "Site-wide Evacuation Alarm" to strike "supplemental audible alarm in high ambient noise areas" was already incorporated in a previous version of the permit.
- Item 1.b.1 This proposed change to the Underground ambulance Weekly Check List was not incorporated because all checklists from Attachment D1 were previously removed.

NMED General Comments

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- Item 4.a.6 The education requirements for the newly defined Transportation Engineer (formerly the Waste Operations Administrative Assistant) were already a bachelors degree, not the associate degree as identified in the proposed language. No change to educational requirements were necessary.
- Item 6.a.1 This proposed change to the dimensions of disposal room entries was incorporated with the exception that "feet" was abbreviated to "ft" to be consistent with the rest of the section.

August 8, 2001, Notification of Class 1 Modifications

- Item 2 NMED received a letter from Matthew Silva of the Environmental Evaluation Group dated October 9, 2001, requesting NMED to review this item under 40 CFR §270.42(a)(1)(iii). The request expressed concern about the safety of placing filters on the body of various containers instead of restricting them to the lids only. NMED has removed all references in Permit Attachment M1 to placement of filters on the body of containers.
- NMED has also deleted language previously implemented by mistake regarding direct loading of ten drum overpack containers. On August 30, 2001, NMED rejected the Class 1 modification dated July 20, 2001, Item 2.d (allowing the direct loading of ten-drum overpack containers) as not being a non-substantive change.

Other changes implemented by NMED

- 1 Attachment B, Section B-5, List of References: Add references to the two Performance Demonstration Program Plans for headspace gas and sampling of solid waste forms to be consistent with the references in Section B-3a(3), Laboratory Qualification.

Enclosure 2

**Comparison Table For B
Permit 11/27/01 and 02/25/02**

Permit Section	Old Text	New Text
Introduction	In the event the Permittees request detailed information on a waste stream, the site will provide a Waste Stream Characterization Package (Section B3-12b(2)). For each waste stream, this package may include the Waste Stream Profile Form, the AK summary, Batch Data Reports and analytical raw data associated with waste container characterization as requested by the Permittees.	In the event the Permittees request detailed information on a waste stream, the site will provide a Waste Stream Characterization Package (Section B3-12b(2)). For each waste stream, this package will include the WSPF, the Characterization Information Summary, and the complete AK summary. The Waste Stream Characterization Package will also include specific Batch Data Reports and raw analytical data associated with waste container characterization as requested by the Permittees.
B-4	The Permittees and the generator/storage sites will assure that waste characterization meets WAP requirements through data validation, usability and reporting controls.	The Permittees will assure that waste characterization by generator/storage sites sending TRU mixed waste to the WIPP for disposal meets WAP requirements through data validation, usability and reporting controls.
B-4a(6)		The generator/storage site will transmit waste container information electronically via the WIPP Waste Information System (WWIS). Data will be entered into the WWIS in the exact format required by the database. Refer to Section B-4b for WWIS reporting requirements and the <i>WIPP Waste Information System User's Manual for Use by Shippers/Generators</i> (DOE, 2001) for the WWIS data fields and format requirements.
B-4a(6)	Once a waste stream is fully characterized, the site project manager will also submit to the Permittees a summary of Characterization Information Summary for the waste stream which includes reconciliation with	Once a waste stream is fully characterized, the Site Project Manager will also submit to the Permittees a WSPF (Figure B-1) accompanied by the Characterization Information Summary for that waste stream which

Permit Section	Old Text	New Text
	DQOs (Permit Attachment B3). Based on this summary, the generator/storage site project manager will complete a Waste Stream Profile Form (Figure B-1). The Waste Stream Profile Form will be used as the basis for acceptance of waste characterization information on TRU mixed wastes to be disposed of at the WIPP.	includes reconciliation with DQOs (Section B3-12b(1)). The WSPF, the Characterization Information Summary, and information from the WWIS will be used as the basis for acceptance of waste characterization information on TRU mixed wastes to be disposed of at the WIPP.
B-4b(1)	At the WIPP facility, this process includes verification that all of the required elements of a Waste Stream Profile Form are present and that the summarized waste characterization data information meet acceptance criteria required for compliance with the WAP (Section B3-12b(1)).	At the WIPP facility, this process includes verification that all of the required elements of the WSPF and the Characterization Information Summary are present (Permit Attachment B3) and that the waste characterization information meet acceptance criteria required for compliance with the WAP (Section B3-12b(1)).
B-4(b)1	When the required waste stream characterization data have been collected by a generator/storage site and the initial generator/storage site audit has been successfully completed, the generator/storage Site Project Manager will then complete a WSPF and submit it to the Permittees, along with the accompanying Characterization Information Summary for that waste stream (Section B3-12b(1)).	When the required waste stream characterization data have been collected by a generator/storage site and the initial generator/storage site audit has been successfully completed, the generator/storage Site Project Manager will verify that waste stream characterization meets the applicable WAP requirements as a part of the project level verification (Section B3-10b). If the waste characterization does not meet the applicable requirements of the WAP, the mixed waste stream cannot be managed, stored, or disposed at WIPP until those requirements are met. The Site Project Manager will then complete a WSPF and submit it to the Permittees, along with the accompanying Characterization Information Summary for that waste stream (Section B3-12b(1)).

Permit Section	Old Text	New Text
B-4(b)1	The Permittees will compare headspace gas, radiographic, visual examination and solid sampling/analysis data obtained subsequent to submittal and approval of the WSPF (and prior to waste shipment) with characterization information presented on this form.	The Permittees will compare headspace gas, radiographic, visual examination and solid sampling/analysis data obtained subsequent to submittal and approval of the WSPF (and prior to submittal) with characterization information presented on this form.
B-4(b)1	The WWIS will conduct internal edit/limit checks based on the approved WSPF. NMED will have read-only access to the WWIS as necessary to determine compliance with the WAP. The Permittees will compare ongoing sampling/analysis characterization data obtained and submitted via the WWIS to the approved WSPF. If this comparison shows that containers have hazardous wastes not reported on the Waste Stream Profile Form, or a different Waste Matrix Code applies, the data are rejected and the waste containers are not accepted for shipment.	The WWIS will conduct internal edit/limit checks as the data are entered, and the data will be available to the Permittees for review as supporting information for WSPF review. NMED will have read-only access to the WWIS as necessary to determine compliance with the WAP. The initial WSPF check performed by the Permittees will include WWIS data and the Characterization Information Summary. The Permittees will compare ongoing sampling/analysis characterization data obtained and submitted via the WWIS to the approved WSPF. If this comparison shows that containers have hazardous wastes not reported on the WSPF, or a different Waste Matrix Code applies, the data are rejected and the waste containers are not accepted for shipment.

**Comparison Table For B3
Permit 11/27/01 and 02/25/02**

Permit Section	Old Text	New Text
B3-10	The procedures presented in this section ensure that WAP records furnish documentary evidence of quality.	The requirements presented in this section ensure that WAP records furnish documentary evidence of quality.
B3-10	The Permittees shall require the sites to generate the following Batch Data Reports in either electronic or hard copy format for data validation, verification, and quality assurance activities:	The Permittees shall require the sites to generate the following Batch Data Reports for data validation, verification, and quality assurance activities:
B3-10a	Completed checklists must be forwarded with Batch Data Reports to the project level. Analytical raw data must be available and reviewed by the data generation level reviewer however, it need not be included in the Batch Data Report.	Completed checklists must be forwarded Batch Data Reports to the project level. Analytical raw data must be available and reviewed by the data generation level reviewer.
B3-10a(1)	One hundred percent of the batch data reports must receive an independent technical review. This review shall be performed by an individual other than the data generator who is qualified to have performed the initial work. The independent technical review must be performed as soon as practicably possible in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the independent technical review must be performed before any waste associated with the data reviewed is managed, stored, or disposed at	One hundred percent of the Batch Data Reports must receive an independent technical review. This review shall be performed by an individual other than the data generator who is qualified to have performed the initial work. The independent technical review must be performed as soon as practicably possible in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the independent technical review must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. The reviewer(s) must release the data as evidenced by signature, and as a consequence ensure the following:

Permit Section	Old Text	New Text
	WIPP. The reviewer(s) must release the data as evidenced by signature, and as a consequence ensure the following as applicable :	
B3-10a(1)	<ul style="list-style-type: none"> Data generation and reduction were conducted in a technically correct manner in accordance with the methods used (procedure revision). Data were reported in the proper units. 	<ul style="list-style-type: none"> Data generation and reduction were conducted in a technically correct manner in accordance with the methods used (procedure revision). Data were reported in the proper units and correct number of significant figures.
B3-10a(2)	One hundred percent of the batch data reports must receive technical supervisory signature release for each testing batch, sampling batch, analytical batch and on-line batch. The technical supervisory signature release must occur as soon as practicably possible after the independent technical review in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the technical supervisory signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This release must ensure the following as applicable :	One hundred percent of the batch data reports must receive technical supervisory signature release for each testing batch, sampling batch, analytical batch and on-line batch. The technical supervisory signature release must occur as soon as practicably possible after the independent technical review in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the technical supervisory signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This release must ensure the following:
B3-10a(3)	The Permittees shall require for each site that one hundred percent of the batch data reports receive QA officer (or designee) signature release. The QA Officer signature release must occur as soon as practicably possible after the	The Permittees shall require for each site that one hundred percent of the batch data reports receive QA officer (or designee) signature release. The QA Officer signature release must occur as soon as practicably possible after the technical supervisory signature release in order to determine

Permit Section	Old Text	New Text
	technical supervisory signature release in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the QA Officer signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This release must ensure the following as applicable :	and correct negative quality trends in the sampling or analytical process. However at a minimum, the QA Officer signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This release must ensure the following:
B3-10b(1)	One hundred percent of the Batch Data Reports must receive Site Project QA Officer signature release. The Site Project QA Officer signature release must occur as soon as practicably possible in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the Site Project QA Officer signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This signature release must ensure the following as applicable :	One hundred percent of the Batch Data Reports must receive Site Project QA Officer signature release. The Site Project QA Officer signature release must occur as soon as practicably possible in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the Site Project QA Officer signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This signature release must ensure the following:
B3-10b(1)	Batch Data Reports are complete and data are properly reported (i.e., data are reported in correct units, and with correct qualifying flags).	Batch Data Reports are complete and data are properly reported (i.e., data are reported in correct units, with correct significant figures , and with correct qualifying flags).
B3-10b(2)	<p>This signature release must ensure the following:</p> <ul style="list-style-type: none"> • Data generation level independent technical, technical supervisory, and QA officer (or 	<p>This signature release must ensure the following:</p> <ul style="list-style-type: none"> • Data generation level independent technical, technical supervisory, and QA officer (or designee) review,

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	<p>designee) review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases.</p> <ul style="list-style-type: none"> • Batch data review checklists are complete. • Verify that data generation level and Site Project QA Officer reviews are complete and ensure that data meet all applicable QAOs of this WAP (Section B3-11). 	<p>validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases.</p> <ul style="list-style-type: none"> • Batch data review checklists are complete. • Batch Data Reports are complete and data are properly reported (e.g., data are reported in the correct units, with the correct number of significant figures, and with qualifying flags). • Verify that data are within established data assessment criteria and meet all applicable QAOs (Section B3-11).
B3-10c	<p>The final level of data verification occurs at the Permittee level and must, at a minimum, consist of an inventory check of the Batch Data Reports to verify completeness. This is done through the Permittees' Audit and Surveillance Program (Permit Attachment B6).</p>	<p>The final level of data verification occurs at the Permittee level and must, at a minimum, consist of an inventory check of the Batch Data Reports to verify completeness. The Permittees are responsible for the verification that Batch Data Reports include the following:</p>
B3-10c		<ul style="list-style-type: none"> • Project-level signature releases • Listing of all waste containers being presented in the report • Listing of all testing, sampling, and analytical batch numbers associated with each waste container being reported in the package • Analytical Batch Data Report case narratives • Site Project QA Officer Summary • Data Validation Summary • Complete summarized qualitative and quantitative data fro all waste containers with data flags and qualifiers.

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B3-10c	For initial Waste Stream Profile Form approval, the Permittees must verify that each submittal is complete with and notify the origination site in writing of the approval of the Waste Stream Profile Form .	For each Waste Stream Profile Form (WSPF) submitted for approval, the Permittees must verify that each submittal (i.e., WSPF and Characterization Information Summary) is complete and notify the originating site in writing of the WSPF approval.
B3-10c	For subsequent shipments made after the Waste Stream Profile approval , the verification be made via the WWIS internal limit checks (Section B-4b(1)(i)).	For subsequent shipments made after the initial WSPF approval, the verification will also include WWIS internal limit checks (Attachment B, Section B-4b(1)(i)) .
B3-11b	The Permittees must also ensure that data of sufficient type, quality, and quantity are collected to meet the WAP DQOs. This is accomplished by review of the original Waste Stream Profile Form and Permittees' Audit and Surveillance Program (Permit Attachment B6).	The Permittees must also ensure that data of sufficient type, quality, and quantity are collected to meet WAP DQOs.
B3-12a	Site QAPjPs shall specify the individual at the site project office who will receive these reports. All Batch Data Reports shall be assigned serial numbers, and each page shall be numbered.	Site QAPjPs shall specify the individual at the site project office who will receive these reports. After review by the Site Project QA Officer, all Batch Data Reports will be forwarded to the Site Project Manager. All Batch Data Reports shall be assigned serial numbers, and each page shall be numbered.
B3-12b	The site project office must ensure that the Characterization Information Summary and the Waste Stream Characterization Package (when requested by the Permittees) are prepared as appropriate. In addition, the site project office shall prepare a Waste Stream Profile Form for	The site project office shall prepare a WSPF for each waste stream certified for shipment to WIPP based on information obtained from the Batch Data Reports. In addition, the site project office must ensure that the Characterization Information Summary and the Waste Stream Characterization Package (when requested by the

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	<p>each waste stream certified for shipment to WIPP. The Site Project QA Officer must also verify these reports are consistent with information found in analytical batch reports. Summarized testing, sampling, and analytical characterization data are included with the Waste Stream Profile Form. The contents of the Waste Stream Profile Form, Characterization Information Summary, and Waste Stream Characterization Package are discussed in the following sections.</p>	<p>Permittees) are prepared as appropriate. The Site Project QA Officer must also verify these reports are consistent with information found in analytical batch reports. Summarized testing, sampling, and analytical data are included in the Characterization Information Summary. The contents of the WSPF, Characterization Information Summary, and Waste Stream Characterization Package are discussed in the following sections.</p> <p>After approval of a WSPF and the associated Characterization Information Summary by the Permittees, the generator/storage site are required to maintain a cross reference of container identification numbers to each Batch Data Report.</p>
B3-12b(1)	<p>The Waste Stream Profile Form (Figure B-1) includes the following information:</p> <ul style="list-style-type: none"> • Generator/storage site name • Generator/storage site EPA ID • Date of audit report approval by NMED (if obtained) • Assignment of waste stream description • Summary Category Group • Waste Matrix Code Group • Waste stream name • Applicable EPA hazardous waste codes • Applicable TRUCON codes • Certification signature of Site Project Manager, name, title, and date signed 	<p>The Waste Stream Profile Form (WSPF, Figure B-1) shall include the following information:</p> <ul style="list-style-type: none"> • Generator/storage site name • Generator/storage site EPA ID • Date of audit report approval by NMED (if obtained) • Original generator of waste stream • The Waste Stream WIPP Identification Number • Summary Category Group • Waste Matrix Code Group • Waste stream name • A description of the waste stream • Applicable EPA hazardous waste codes • Applicable TRUCON codes • A listing of acceptable knowledge documentation used to

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		<p>identify the waste stream</p> <ul style="list-style-type: none"> • The waste characterization procedures used and the reference and date of the procedure • Certification signature of Site Project Manager, name, title, and date signed
B3-12b(2)	<p>The Characterization Information Summary includes the following elements:</p> <ul style="list-style-type: none"> • Data reconciliation with DQOs • Cross-reference of container identification numbers to each Batch Data Report • Headspace gas summary data listing the identification numbers of samples used in the statistical reduction, the maximum, mean, standard deviation, UCL₉₀, RTL, and associated EPA hazardous waste codes that must be applied to the waste stream. • TIC listing and evaluation, and verification that AK was confirmed. • RTR and VE summary to document prohibited items are not present and to confirm AK. • AK summary including waste stream name, waste stream number, point of generation, waste stream volume, generation dates, TRUCON codes, TWBIR information, generating processes, RCRA determinations, and radionuclide information. <p>After approval of a Waste Stream Profile Form</p>	<p>The Characterization Information Summary shall include the following elements:</p> <ul style="list-style-type: none"> • Data reconciliation with DQOs • Headspace gas summary data listing the identification numbers of samples used in the statistical reduction, the maximum, mean, standard deviation, UCL₉₀, RTL, and associated EPA hazardous waste codes that must be applied to the waste stream. • Total metal, VOC, and SVOC analytical results for homogeneous solids and soil/gravel (if applicable) • TIC listing and evaluation, and verification that acceptable knowledge (AK) was confirmed. • Radiography and visual examination summary to document that all prohibited items are absent in the waste and to confirm AK. • A complete listing of all container identification numbers used to generate the WSPF, cross-referenced to each Batch Data Report • Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR

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	and the associated Characterization Information Summary by the Permittees, the generator/storage site are required to maintain a cross reference of container identification numbers to each Batch Data Report.	information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, all references used to generate the AK summary, and any other information required by Permit Attachment B4, Section B4-2b.
B3-12b(3)	<p>The Waste Stream Characterization Package consists the following:</p> <ul style="list-style-type: none"> • Waste Stream Profile Form • Accompanying Characterization Information Summary • Complete AK summary • Batch Data Reports supporting the confirmation of AK as well as others requested by the Permittees • Raw analytical data requested by the Permittees 	<p>The Waste Stream Characterization Package includes the following information:</p> <ul style="list-style-type: none"> • Waste Stream Profile Form (WSPF, Section B3-12b(1)) • Accompanying Characterization Information Summary (Section B3-12b(2)) • Complete AK summary (Section B3-12b(2)) • Batch Data Reports supporting the confirmation of AK and any others requested by the Permittees • Raw analytical data requested by the Permittees

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Table B3-11, Testing Batch Data Report Contents	<p>Identification of Vented Rigid Liners: Optional for radiography batch data report.</p> <p>Comment for Description of Container Contents: Provide enough detail for verification of estimated weights for the 12 waste matrix parameters.</p> <p>Signature of Visual Examination Expert and Date Comment: When visual examination expert is consulted.</p> <p>Data Review Checklists Comment: None</p>	<p>Identification of Rigid Liners: Required for radiography batch data report.</p> <p>Comment for Description of Container Contents: Provide enough detail to identify all discernible waste items, etc., and to verify estimated weights for the 12 waste matrix parameters.</p> <p>Signature of Visual Examination Expert and Date Comment: None</p> <p>Data Review Checklists Comment: All data review checklists will be identified.</p>
Table B3-12, Sampling Batch Data Report Contents	<p>Sample Location: Optional for both headspace gas and solid sampling batch data report.</p> <p>Drum Age: Optional for headspace gas batch data report</p> <p>Equilibration time: Optional for headspace gas batch data report</p> <p>Verification of Rigid Liner Venting: Optional for headspace gas batch data report</p> <p>Data Review Checklists Comment: None</p>	<p>Sample Location: Required for both headspace gas and solid sampling batch data report.</p> <p>Drum Age: Required for headspace gas batch data report</p> <p>Equilibration time: Required for headspace gas batch data report</p> <p>Verification of Rigid Liner Venting: Required for headspace gas batch data report</p> <p>Data Review Checklists Comment: All data review checklists will be identified.</p>

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Table B3-13, Analytical Batch Data Report Contents	<p>Holding Time: Optional for solid sampling</p> <p>Date and time Analyzed: Optional for headspace gas and solid sampling</p> <p>TIC Evaluation: Optional for headspace gas and solid sampling</p> <p>Operator Signature and Analysis Date: Optional for headspace gas and solid sampling</p> <p>Data Review Checklists Comment: None</p>	<p>Holding Time: Required for solid sampling</p> <p>Date and time Analyzed: Required for headspace gas and solid sampling</p> <p>TIC Evaluation: Required for headspace gas and solid sampling</p> <p>Operator Signature and Analysis Date: Required for headspace gas and solid sampling</p> <p>Data Review Checklists Comment: All data review checklists will be identified.</p>