



**BILL RICHARDSON**  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**

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ENTERED



**RON CURRY**  
SECRETARY

**DERRITH WATCHMAN-MOORE**  
DEPUTY SECRETARY

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 28, 2003

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

Dr. Steven Warren, President  
Washington TRU Solutions, LLC  
P.O. Box 2078  
Carlsbad, New Mexico 88221-5608

**RE:    DUPLICATIVE WASTE STREAM PROFILE FORMS FOR SAVANNAH RIVER SITE  
       WIPP HAZARDOUS WASTE FACILITY PERMIT  
       EPA I.D. NUMBER NM4890139088**

Dear Drs. Triay and Warren:

On April 1, 2002, the New Mexico Environment Department (NMED) received a transmittal of an approved Waste Stream Profile Form (WSPF) for Savannah River Site (SRS), WSPF Number SR-W027-221F-HETA. On November 20, 2002, NMED received a transmittal of an apparently different waste stream for SRS, WSPF Number SR2002.002.00.

Upon subsequent review of these documents, NMED has determined that the data on each form are nearly identical with few exceptions (e.g., technical contact personnel; references of procedural revision changes for the characterization of the waste; the sampling and analysis example data or batch data reports). NMED also notes that the volume of each stream is exactly the same (5666 fifty-five gallon drums). The RCRA waste codes, acceptable knowledge information, supplemental information, sampling and analysis results, and radionuclide information appear to be the same for these two waste streams.

NMED therefore has reason to believe that these two streams may in fact be the same waste stream. We are concerned that estimates of waste volumes may be overstated if a single waste population has been reported under two separate WSPF numbers. NMED is also concerned that, if this is indeed one waste stream, the information recorded in the WIPP Waste Information System (WWIS) reflects an arbitrary distinction that in reality does not exist. NMED notes that

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shipments of SR2002.002.00 appear to have ended in early January 2003, while shipments of SR-W027-221F-HETA are ongoing.

Please evaluate the current status of these waste streams (including correct numbers of containers), the status of information in the WWIS, and any other potential issues associated with these two declared waste streams. Your reporting of any findings to NMED within seven (7) calendar days of receipt of this letter is required pursuant to Permit Condition I.E.8, Duty To Provide Information.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB:soz

cc: Steve Zappe, NMED HWB  
Betsy Forinash, EPA ORIA  
Laurie King, EPA Region 6  
Connie Walker, Trinity Engineering  
File: Red WIPP '03