Secretary Ron Curry  
New Mexico Environment Department  
1190 Saint Francis Drive  
Santa Fe, NM 87502  

March 4, 2004  

Subject: Preparation of Permit Attachment B6 Checklists and Electronic Final Audit Report Files  

Dear Mr. Curry:  

Members of our staffs have recently discussed the above subjects. This letter is to confirm the agreements reached during those discussions.  

1. Preparation of B6 checklists: Citation of document (e.g., procedure and plan) revision numbers is not required when completing B6 checklists as long as the specific revisions that are in effect at the conclusion of the audit are identified elsewhere in the audit report (i.e., the audited documents list). Due to the possibility that documents may be revised between the start of the audit and the final closeout of audit findings, inclusion of revision numbers in the B6 checklists can be confusing and misleading to independent reviewers.  

2. Transmittal of electronic final audit report files to the New Mexico Environment Department (NMED): Electronic versions of audit documentation are not required to be submitted to NMED by the Hazardous Waste Facility Permit (HWFP). However, since the required hard copy files are extensive and difficult to search, and NMED has requested that CBFO assist them by including electronic versions of documents with the submittal, CBFO will do so. In order to avoid problems with incompatibility of software, the electronic versions of audit files will be distilled or scanned into .pdf files or other non-platform dependent format. The files will be placed on compact disks (CDs). This electronic documentation will include the audit report, the B6 checklists, and the audited plans and procedures. In addition, text of the audit report transmittal letter is to be revised to state that an electronic version of audit documentation is included as a courtesy for NMEDs use, but is not to be regarded as the formal submittal. The hard copy files constitute the formal submittal.  

If you have any questions regarding this, please contact Ava Holland of my staff at 505-234-7423 or myself at 505-234-7304.  

Sincerely,  

[Signature]  

R. Paul Detwiler  
Acting Manager
cc:
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