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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 6, 2004

R. Paul Detwiler, Acting 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: NMED APPROVAL OF THE HANFORD/CENTRAL CHARACTERIZATION PROJECT
SINGLE-SAMPLE MANIFOLD HEADSPACE GAS SAMPLING AND ANALYSIS SYSTEM
AUDIT REPORT, AUDIT A-04-07
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Mr. Detwiler and Dr. Warren:

On December 15, 2003, the New Mexico Environment Department (NMED) received the Final Audit Report of the Central Characterization Project Single-Sample Manifold Headspace Gas Sampling and Analysis System at the Hanford Site (**Hanford/CCP**), Audit Number A-04-07 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (**CBFO**). CBFO and Washington TRU Solutions LLC (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this initial certification audit was to assess the adequacy, implementation, and effectiveness of the Hanford/CCP waste characterization process for headspace gas sampling, analysis, and associated activities using the CCP single-manifold headspace gas sampling and analysis system for S5000 debris contact-handled waste relative to the requirements of the WIPP Permit. The Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final Hanford/CCP standard operating procedures (hardcopy only)
- Items corrected during the audit

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- Objective evidence examined during the audit
 - General information
 - Headspace gas

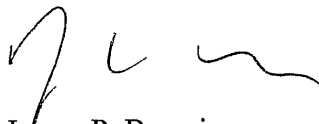
NMED representatives observed the Hanford/CCP audit on November 11-13, 2003. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there were two deficiencies requiring only remedial actions that were corrected during the audit; one observation identifying a condition that, if not controlled, could result in a condition adverse to quality; and one recommendation identifying an opportunity for improvement.

Attached are NMED's specific comments based upon observation of the Hanford/CCP audit and review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns. NMED requests that the Permittees correct the items listed in the attachment and return them within thirty days upon receipt of this letter, indicating revisions to any text in the Audit Report and checklists with redline/strikeout annotation. This will ensure the administrative record contains a complete and accurate Audit Report.

NMED concludes that this Audit Report demonstrates that Hanford/CCP has adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for Audit A-04-07 for the certification of the Hanford/CCP waste characterization process for headspace gas sampling, analysis, and associated activities using the CCP single-manifold headspace gas sampling and analysis system for S5000 debris contact-handled waste, and amends the previous Audit Report approvals for Audits A-03-14 and A-04-06 issued by NMED on December 5, 2003 and July 2, 2004 respectively, to include all waste forms and processes evaluated by this audit.

If you have any questions regarding this matter, please contact me at (505) 428-2512.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Charles Lundstrom, NMED WWMD
Steve Zappe, NMED HWB

Tracy Hughes, NMED OGC
Tom Fitzsimmons, WSDE
Laurie King, EPA Region 6
Betsy Forinash, EPA ORIA
Connie Walker, Trinity Engineering
Don Hancock, SRIC
Joni Arends, CCNS
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NMED COMMENTS ON THE
HANFORD/CENTRAL CHARACTERIZATION PROJECT SINGLE-SAMPLE
MANIFOLD HEADSPACE GAS SAMPLING AND ANALYSIS SYSTEM

NMED needs the following B6 Checklist items addressed:

1. Pertaining to question 48, the reference is cited in the audit report is CCP-TP-009, Section 4.5. There is no such section. This may be a typographical error.
2. Pertaining to question 70, the reference cited in the audit report is CCP-TP-009, Section 4.4.1. It appears that Section 4.4.2 is actually the correct citation. This may be a typographical error.
3. Pertaining to question 183, the reference cited in the audit report is CCP-TP-007, Table 1-7. The cited table is non-existent.
4. Pertaining to question 184, the reference cited in the audit report is CCP-TP-007, Attachment 2, Numbers 9 and 10. Number 10 in Attachment 2 is non-existent.
5. Pertaining to questions 183, 191, 198, 220, 224, and 226, the references cited in the audit report are CCP-TP-007, Sections 4.3.7, 4.4.5, 4.4.6, 4.4.7, 4.4.8, and 4.4.9. These sections are non-existent.
6. Pertaining to question 199, the references cited in the audit report are CCP-TP-029, Attachments 1, 2, 4, 6, and 10. These attachments are non-existent.
7. Pertaining to question 202, the reference cited in the audit report is CCP-TP-007, Section 4.5.3. This citation does not adequately answer the question. This may be a typographical error.