



BILL RICHARDSON
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



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 7, 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 COMMENTS ON AND APPROVAL OF THE HANFORD SITE FINAL AUDIT REPORT,
AUDIT A-04-19
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Mr. Detwiler and Dr. Warren:

On August 17, 2004, the New Mexico Environment Department (NMED) received the Final Audit Report of the Hanford Site, Audit Number A-04-19 (**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 annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the Hanford Site waste characterization processes for retrievably stored and newly generated debris (S5000) contact-handled waste at the Waste Receiving and Processing (**WRAP**) facility relative to the requirements of the WIPP Permit. The audit also assessed newly generated S5000 and homogenous solids (S3000) waste characterized at the Plutonium Finishing Plant (**PF**), WRAP, and T-Plant; procedures and processes for packaging waste at the PFP; and S3000 waste streams analyzed by the Idaho National Engineering and Environmental Laboratory. The Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final Hanford Site standard operating procedures (hardcopy and electronic)



- Corrective action report and items corrected during the audit
- Objective evidence examined during the audit
 - General information
 - Solids and soils/gravel sampling
 - Acceptable knowledge
 - Headspace gas
 - Real time radiography
 - Visual examination

NMED representatives observed the Hanford Site audit on June 14 – 18, 2004. 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 was one WAP-related condition adverse to quality requiring the issuance of a CBFO corrective action report that was corrected prior to submittal of the Audit Report; four deficiencies requiring only remedial actions that were corrected during the audit; two observations identifying conditions that, if not controlled, could result in conditions adverse to quality; and two recommendations identifying opportunities for improvement.

Attached are NMED's specific comments based upon observation of the Hanford Site 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 Site has adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for Hanford Site Audit A-04-19 for the recertification of retrievably stored and repackaged debris and homogeneous solids contact-handled waste, and amends the previous Audit Report approvals for Audits A-03-14, A-04-06, and A-04-07 issued by NMED on December 5, 2003, July 2, 2004, and July 6, 2004 respectively, to include all waste forms and processes evaluated by this recertification audit.

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

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
File: Red WIPP '04

NMED COMMENTS ON THE
HANFORD SITE FINAL AUDIT REPORT A-04-19

NMED's review indicated that the Audit Report showed less attention to detail than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, there are some omissions, errors, and inconsistencies including but not limited to the following items

1. Pertaining to questions 12 and 13 of the B6 Checklist, Hanford procedure WRP1-OP-0908 references Table 5. Prohibited Items, Bullet 9 of Table 5 states: "PCB concentrations equal to or greater than 50 ppm (*fluorescent light ballasts, transformers containing liquid used for cooling or insulation, and capacitors containing liquid used for a dielectric material*)." This procedure revision became effective on May 26, 2004. The permit modification pertaining to PCBs as no longer prohibited items became effective September 23, 2003. The bullet item in the procedure should be rewritten.

NOTE: Procedure HNF-2599 (the Hanford Site QAPjP) was correctly written to *not* include PCBs as prohibited items, as indicated in Bullet 6 of Section B-1c of the QAPjP.
2. Pertaining to questions 12 and 13 of the B6 Checklist, procedure, WMP-400 Section.7.1.10, paragraph 4.1.12, states in bullet 4 "Polychlorinated biphenyl (PCB) concentrations equal to or greater than 50 ppm." This procedure revision was approved May 13, 2004 and became effective May 18, 2004. The permit modification pertaining to PCBs as no longer prohibited items became effective September 23, 2003. The bullet should be rewritten. (See NOTE for Comment 1).
3. Although not specifically cited to answer questions 12 and 13 of the B6 Checklist, procedure, WRP1-OP-0729, Section 6.9.1, NOTE bullet 3, dash 8, which states "Polychlorinated Biphenyl (PCB) concentrations equal to or greater than 50 ppm." The procedure revision became effective January 23, 2004 and the permit modification pertaining to PCBs as no longer prohibited items became effective September 23, 2003. This portion of the procedure should be rewritten. (See NOTE for Comment 1).
4. Pertaining to questions 12 and 13 of the B6 Checklist, procedure, ZO-160-080, Attachment 5, bullet 4 states: "Polychlorinated biphenyl (PCB) concentrations equal to or greater than 50 ppm." The procedure revision became effective June 8, 2004 and the permit modification pertaining to PCBs no longer prohibited items became effective September 23, 2003. This portion of the procedure should be rewritten. (See NOTE for Comment 1).

5. Pertaining to questions 12 and 13 of the B6 Checklist, procedure, ZO-160-081, Attachment 5, bullet 4 states: "Polychlorinated biphenyl (PCB) concentrations equal to or greater than 50 ppm." The procedure revision became effective April 29, 2004 and the permit modification pertaining to PCBs no longer prohibited items became effective September 23, 2003. This portion of the procedure should be rewritten. (See NOTE for Comment 1).
6. Pertaining to questions 12 and 13 of the B6 Checklist, procedure, ZO-170-057, Attachment 5, bullet 4 states: "Polychlorinated biphenyl (PCB) concentrations equal to or greater than 50 ppm." The procedure revision became effective May 26, 2004 and the permit modification pertaining to PCBs no longer prohibited items became effective September 23, 2003. This portion of the procedure should be rewritten. (See NOTE for Comment 1).
7. Pertaining to question 47 of the B6 Checklist, procedure, DO-080-009, Section 6.8 does not seem to answer the question satisfactorily.
8. Pertaining to questions 75, 76, 77, 78, 79, and 80 of the B6 Checklist, procedure ZO-160-082 is cited as answering the question with no specific sections, notes, and/or tables cited.
9. Pertaining to questions 91, 119, 120, and 122 of the B6 Checklist, procedure ZO-160-082, Section 6.2.31 CAUTION note states: "Samples must be maintained at $4^{\circ} \text{C} \pm 2^{\circ} \text{C}$." Table B1-4 of the permit states in Required Preservatives column, "Cool to 4°C ." The procedure should be changed to match the permit wording.
10. Also pertaining to question 91 of the B6 Checklist, procedure ZO-160-082, Section 3.5.10 states: "To preserve the samples, the samples are to be stored in either an Isolated Transport Container (ITC) containing frozen blue ice or in a laboratory refrigerator maintained at $4^{\circ} \text{C} \pm 2^{\circ} \text{C}$." Table B1-4 of the permit states in the Required Preservatives column, "Cool to 4°C ." The procedure should be changed to match the permit wording.