



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 September 20, 2004



Mr. Steve Zappe, Project Leader
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Bldg. 1
 Santa Fe, New Mexico 87505-6303

Subject: Transmittal of Revised B6 Checklist for Re-Certification Audit Report for the Hanford Site (A-04-19)

Dear Mr. Zappe:

This letter transmits the revised final audit report and B6 checklists for the Carlsbad Field Office (CBFO) Audit A-04-19 of the Hanford Site. The revised B6 checklists address the issues identified in a letter from the New Mexico Environment Department (NMED) dated September 7, 2004. Also enclosed with this letter are the responses to the comments contained in the attachment to the letter.

Please contact the CBFO Quality Assurance Manager, Ava L. Holland, at (505) 234-7423 should you have any questions concerning this revised final audit report.

Sincerely,

R. Paul Detwiler
 Acting Manager

Enclosure

cc: w/o enclosure
 A. Holland, CBFO *ED
 M. Navarrete, CBFO *ED
 K. Watson, CBFO *ED
 J. Bearzi, NMED *ED
 S. Holmes, NMED *ED
 P. Rodriguez, CTAC *ED
 L. Greene, WRES *ED

cc: w/enclosure
 C. Walker, TechLaw
 WIPP Operating Record, MS 486-06
 CBFO QA File
 CBFO M&RC



**NMED COMMENTS AND THE CBFO RESPONSES TO THE COMMENTS ON
THE HANFORD SITE (HANFORD)
FINAL AUDIT REPORT A-04-19**

The following contains the CBFO responses to each of the NMED comments on the Hanford Site (RFETS) Final Audit Report A-04-19.

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.

Response:

The CBFO concurs that while PCBs are no longer prohibited items (in accordance with the HWFP), PCB acceptance criteria of no concentrations equal or greater than 50ppm, remains a requirement of the Waste Acceptance Criteria (DOE/WIPP-02-3122, Rev. 1, section 3.5.6). Therefore, all generator sites must recognize this requirement in their respective implementing documents/procedures in order to maintain an adequate program that meets all of upper requirements documents, not solely the HWFP. Upon pending revision of this document, however, all generator sites, (Hanford included) will be required to revise all respective procedures, and will at that point lift the PCB concentrations requirement. No further action will be required at this time.

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).

Response:

The CBFO concurs that while PCBs are no longer prohibited items (in accordance with the HWFP), PCB acceptance criteria of no concentrations equal or greater than 50ppm, remains a requirement of the Waste Acceptance Criteria (DOE/WIPP-02-3122, Rev. 1, section 3.5.6). Therefore, all generator sites must

recognize this requirement in their respective implementing documents/ procedures in order to maintain an adequate program that meets all of upper requirements documents, not solely the HWFP. Upon pending revision of this document, however, all generator sites, (Hanford included) will be required to revise all respective procedures, and will at that point lift the PCB concentrations requirement. No further action will be required at this time.

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).

Response:

The CBFO concurs that while PCBs are no longer prohibited items (in accordance with the HWFP), PCB acceptance criteria of no concentrations equal or greater than 50ppm, remains a requirement of the Waste Acceptance Criteria (DOE/WIPP-02-3122, Rev. 1, section 3.5.6). Therefore, all generator sites must recognize this requirement in their respective implementing documents/ procedures in order to maintain an adequate program that meets all of upper requirements documents, not solely the HWFP. Upon pending revision of this document, however, all generator sites, (Hanford included) will be required to revise all respective procedures, and will at that point lift the PCB concentrations requirement. No further action will be required at this time.

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).

Response:

The CBFO concurs that while PCBs are no longer prohibited items (in accordance with the HWFP), PCB acceptance criteria of no concentrations equal or greater than 50ppm, remains a requirement of the Waste Acceptance Criteria (DOE/WIPP-02-3122, Rev. 1, section 3.5.6). Therefore, all generator sites must recognize this requirement in their respective implementing documents/ procedures in order to maintain an adequate program that meets all of upper requirements documents, not solely the HWFP. Upon pending revision of this document, however, all generator sites, (Hanford included) will be required to revise all respective procedures, and will at that point lift the PCB concentrations requirement. No further action will be required at this time.

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).

Response:

The CBFO concurs that while PCBs are no longer prohibited items (in accordance with the HWFP), PCB acceptance criteria of no concentrations equal or greater than 50ppm, remains a requirement of the Waste Acceptance Criteria (DOE/WIPP-02-3122, Rev. 1, section 3.5.6). Therefore, all generator sites must recognize this requirement in their respective implementing documents/ procedures in order to maintain an adequate program that meets all of upper requirements documents, not solely the HWFP. Upon pending revision of this document, however, all generator sites, (Hanford included) will be required to revise all respective procedures, and will at that point lift the PCB concentrations requirement. No further action will be required at this time.

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).

Response:

The CBFO concurs that while PCBs are no longer prohibited items (in accordance with the HWFP), PCB acceptance criteria of no concentrations equal or greater than 50ppm, remains a requirement of the Waste Acceptance Criteria (DOE/WIPP-02-3122, Rev. 1, section 3.5.6). Therefore, all generator sites must recognize this requirement in their respective implementing documents/ procedures in order to maintain an adequate program that meets all of upper requirements documents, not solely the HWFP. Upon pending revision of this document, however, all generator sites, (Hanford included) will be required to revise all respective procedures, and will at that point lift the PCB concentrations requirement. No further action will be required at this time.

7. Pertaining to question 47 of the B6 Checklist, procedure, DO-080-009, Section 6.8 does not seem to answer the question satisfactorily.

Response:

Procedure DO-080-009 was incorrectly referenced. The reference has been removed.

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.

Response:

Procedure ZO-160-082 was incorrectly referenced. The reference has been removed.

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.

Response:

The preservation requirement, "Cool to 4°C ", is incorporated in the Hanford QAPjP, HNF-2599, Table B1-4. Procedure ZO-160-082 was written to implement this requirement. Compliance with this requirement during sample storage is verified by measuring the air temperature inside the sample refrigerator. The air temperature inside the refrigerator will fluctuate due to the refrigerator cycling on/off and the opening and closing of refrigerator doors. For this reason, a reasonable quantitative acceptance criteria must be defined in the implementing procedure.

Both the HWFP and SW-846 are imprecise in giving the length of time required to cool the sample to the required temperature, as well as realizing that physical variances of temperature will occur due to the aforementioned conditions.

The USEPA, in the latest Organic Statement of Work for the Contract Laboratory Program, specifies that temperatures of refrigerators are to be " $4^{\circ}\text{C} (\pm 2^{\circ})$ " in recognition of these facts.

Therefore, establishing a quantitative acceptance criteria for the temperature requirement of " $4^{\circ}\text{C} \pm 2^{\circ}\text{C}$ " implements the requirements of Table B1-4 of the HWFP and is based on established EPA guidance.

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.

Response:

The preservation requirement, "Cool to 4° C", is incorporated in the Hanford QAPjP, HNF-2599, Table B1-4. Procedure ZO-160-082 was written to implement this requirement. Compliance with this requirement during sample storage is verified by measuring the air temperature inside the sample refrigerator. The air temperature inside the refrigerator will fluctuate due to the refrigerator cycling on/off and the opening and closing of refrigerator doors. For this reason, a reasonable quantitative acceptance criteria must be defined in the implementing procedure.

Both the HWFP and SW-846 are imprecise in giving the length of time required to cool the sample to the required temperature, as well as realizing that physical variances of temperature will occur due to the aforementioned conditions.

The USEPA, in the latest Organic Statement of Work for the Contract Laboratory Program, specifies that temperatures of refrigerators are to be "4° C (± 2°)" in recognition of these facts.

Therefore, establishing a quantitative acceptance criteria for the temperature requirement of "4° C ± 2° C" implements the requirements of Table B1-4 of the HWFP and is based on established EPA guidance. The requirement for frozen Blue Ice in the ITC implements the requirements from Section B1-5 of the HWFP namely, "If temperatures must be maintained, an adequate number of cold packs necessary to maintain the preservation temperature shall be added to the package."