

Steve Zappe

From: Steve Zappe [steve_zappe@nmenv.state.nm.us]
Sent: Monday, May 09, 2005 12:58 PM
To: Ava Holland (Ava.Holland@wipp.ws); 'Jim.Wilburn@wipp.ws'
Cc: 'Conniewalk@aol.com'; James Bearzi (James Bearzi); Ed Feltcorn (Feltcorn.Ed@epamail.epa.gov); Rajani Joglekar (joglekar.rajani@epa.gov); 'Carl Chavez'; 'Kate Lynnes'; 'Kevin Krause'; 'Steve Holmes'
Subject: Revised NMED Observer Inquiry from Audit A-05-12



Ava, Jimmy -

Steve Holmes provided an observer inquiry at the close of the ICP/CCP audit (A-05-12) last week that had been developed by Connie

Walker with my input over the telephone. Upon my review of the inquiry as it had been submitted, I identified some typographical errors and other items that I believed needed to be fixed. Attached is a revised observer inquiry regarding the concerns NMED has over the approval of newly generated solids and debris wastes from Pit 4. Please replace the previous observer inquiry with this one. Thanks!

Steve

6/6/2005



NMED Observer Inquiry – May 6, 2005 (Connie Walker, Steve Holmes)
Revised, May 9, 2005 (Steve Zappe)

In the revised Audit Plan for Audit A-05-12 transmitted to NMED in a letter dated April 6, 2005, the DOE/CBFO stated that the audit was being performed to address the adequacy, implementation, and effectiveness of ICP/CCP waste activities related to permit and WAC requirements for “S3000 retrievably stored and newly generated, and S5000 retrievably stored and newly generated, and S4000 newly generated” wastes. Five separate waste streams were presented in AK summaries during the audit as being representative of these retrievably stored and newly generated waste groups. These are:

- Pit 4 newly generated soil
- Pit 4 newly generated debris
- Pit 4 newly generated solids
- Graphite retrievably stored debris
- 374 Sludge retrievably stored solids

Of these, completed WSPFs and full traceability appear to be demonstrable for retrievably stored solids and debris, possibly demonstrable for newly generated soils, but *not* demonstrable for newly generated solids or debris. NMED does not believe the audit team evaluated sufficient objective evidence that would justify approving the implementation and effectiveness of procedures for newly generated solids and debris wastes, particularly in AK. Hence, NMED’s approval of the final audit report may be limited to retrievably stored solids and debris wastes, because the audit team indicated that the program effectiveness was indeterminate for newly generated soils, and because complete traceability, etc., for newly generated solids and debris wastes were not provided during the audit for review.