

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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Secretary

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 21, 2008

David Moody, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Farok Sharif, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: NMED APPROVAL OF THE IDAHO NATIONAL LABORATORY/CENTRAL
CHARACTERIZATION PROJECT ANALYTICAL LABORATORIES AUDIT A-08-22
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Dr. Moody and Mr. Sharif:

On July 7, 2008, the New Mexico Environment Department (NMED) received the Final Audit Report of the Idaho National Laboratory/Central Characterization Project (INL/CCP) Analytical Laboratories Audit Number A-08-22 (**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 INL/CCP Analytical Laboratories waste characterization processes associated with headspace gas (HSG) analysis of S5000 debris wastes; totals analysis of S3000 homogeneous solids and S4000 soils/gravel; data generation level validation and verification of S3000, S4000, and S5000 wastes; review of the Performance Demonstration Program; and SUMMA[®] canister preparation and certification for use by generator sites relative to the requirements of the WIPP Permit. The final Audit Report consisted of the following items:

- A narrative report (hardcopy and electronic)
- Completed copies of relevant Permit Attachment B6 checklists (hardcopy and electronic)
- Final INL/CCP Analytical Laboratories standard operating procedures (hardcopy and electronic)

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- Objective evidence examined during the audit
 - General information
 - Solids and soils/gravel analysis
 - Headspace gas analysis
 - Data generation level validation and verification
 - Performance Demonstration Program
 - SUMMA[®] canister preparation and certification

An NMED representative observed the INL/CCP Analytical Laboratories audit on May 13-15, 2008. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions I.I.C.2 (Audit and Surveillance Program) and I.I.C.1 (Waste Analysis Plan [WAP]). The Audit Report indicates that there were no conditions adverse to quality, no observations, and two recommendations identifying opportunities for improvement.

NMED concludes that this Audit Report demonstrates that the INL/CCP Analytical Laboratories have adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for INL/CCP Analytical Laboratories Audit A-08-22 for recertification of solids analysis, HSG analysis, data generation-level verification and validation, continued activities in the performance demonstration program, and SUMMA[®] canister preparation and certification for use by generator sites, and amends the previous Audit Report approval for Audit A-07-06 issued by NMED on July 25, 2007 to include all waste forms and processes evaluated by this recertification audit.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at the generator/storage site, and does not constitute approval of individual waste characterization procedures, nor condone inappropriate applications of those procedures. This approval does not relieve the Permittees of their obligation to comply with the requirements of the permit or other applicable laws and regulations.

If you have any questions regarding this matter, please contact me at (505) 476-6016 or Steve Zappe at (505) 476-6051.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

cc: Marcy Leavitt, NMED WWMD
Steve Zappe, NMED HWB
Chuck Noble, NMED OGC

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