



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 30, 2010

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/COMMENTS ON THE IDAHO NATIONAL LABORATORY/CENTRAL CHARACTERIZATION PROJECT ANALYTICAL LABORATORIES FINAL AUDIT REPORT, AUDIT A-10-17 WASTE ISOLATION PILOT PLANT EPA I.D. NUMBER NM4890139088

Dear Dr. Moody and Mr. Sharif:

On July 20 2010, 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-10-17 (**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 analysis (HSG) 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; 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 (Tables B6-1, B6-2, and B6-4) (hardcopy and electronic)

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- Final INL/CCP Analytical Laboratories standard operating procedures (hardcopy and electronic)
- Item corrected during the audit
- Objective evidence examined during the audit
 - General information
 - Solids and soils/gravel analytical data
 - Headspace gas analytical data

NMED representatives observed the audit on June 8-10, 2010. 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 deficiency requiring only remedial action that was corrected during the audit; and
- One observation identifying a condition that, if not controlled, could result in a condition adverse to quality.

Attached are NMED's general comments based upon observation of the 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 concludes that this Audit Report demonstrates that INL/CCP Analytical Laboratories have implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for INL/CCP Analytical Laboratories Audit A-10-17 for the recertification of HSG analysis, solids analysis, data generation-level verification and validation, and SUMMA[®] canister preparation and certification for use by generator sites, and amends the previous Audit Report approval for Audit A-09-13 issued by NMED on September 11, 2009 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 Steve Zappe at (505) 476-6051.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Marcy Leavitt, NMED WWMD
Steve Zappe, NMED HWB
Chuck Noble, NMED OGC
Thomas Kesterson, NMED DOEOB
Toni Hardsety, IDEQ
Susan Burke, IDEQ INL Oversight
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
Connie Walker, Trinity Engineering
Don Hancock, SRIC
Joni Arends, CCNS
File: Red WIPP '10

NMED COMMENTS ON THE
IDAHO NATIONAL LABORATORY/CENTRAL CHARACTERIZATION PROJECT
(INL/CCP) ANALYTICAL LABORATORIES FINAL AUDIT REPORT A-10-17

NMED's review indicated that the body of the Audit Report and the B6 checklists generally appear to address the applicable elements. NMED provides the following comments for the Permittees consideration. No response is necessary.

1. Section 7.0 of the Final Audit Report contains the List of Attachments. There is no information on Attachment 3 in the list. NMED understands that Attachment 3 is provided in the Teal Folder and is also listed in the Content Map. In the future, a page for Attachment 3 with information to its location would be useful.
2. Question 204 asks about OVA (organic vapor analyzer), and the acronym QVA is incorrectly used in the comment.