



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 28, 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 EVALUATION OF ACCEPTABLE KNOWLEDGE SUFFICIENCY DETERMINATION
REQUEST, SR-BCLDP.003
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Dr. Moody and Mr. Sharif:

On April 19, 2010, the New Mexico Environment Department (NMED) received a request for evaluation of a provisionally approved Scenario 3 Acceptable Knowledge (AK) Sufficiency Determination Request (Determination Request) for Battelle Columbus Laboratory (BCL) waste stream SR-BCLDP.003 at the Savannah River Site (SRS), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO submitted this request for evaluation under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Attachment B, Section B-0b. A Scenario 3 Determination Request seeks to demonstrate that chemical sampling and analysis is not required because the AK information is sufficient. The information submitted by CBFO consisted of the following items:

- A transmittal letter requesting NMED's evaluation of CBFO's provisional approval of the Determination Request
- An "Acceptable Knowledge Sufficiency Determination Request" from the Department of Energy Savannah River Operations Office (DOE-SR) for Waste Stream SR-BCLDP.003, Battelle Columbus Laboratories RH TRU Homogeneous Waste From the Building JN-1 Hot Cell Laboratory; Waste Stream SR-BCLDP.003 – Hydraulic Sludge and Debris

100941



- CBFO Management Procedures for Determination Request reviews and general document reviews; a list of Determination Request reviewers and qualifications; Determination Request checklists (completeness, technical adequacy); and a Document Review Record for the Determination Request
- "Acceptable Knowledge Sufficiency Compliance Matrix for Waste Stream SR-BCLDP.003," a table documenting the contents of the Determination Request and CBFO's review of the Determination Request
- Supporting documents provided electronically on a DVD, which included approximately 381 AK source documents

Based on a review of all the information provided in the Determination Request, NMED finds the Determination Request to be adequate. NMED therefore concurs with CBFO's provisional approval of the Determination Request. This concurrence is limited to the seven liners identified as waste stream SR-BCLDP.003 in the May 7, 2008 spreadsheet titled, "BCLDP RH TRU Waste Inventory Analysis" in AK source document U513 (attached).

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 DOE/OB
Robert King, Jr., SC DHEC
Shelly Wilson, SC DHEC
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
Connie Walker, Trinity Engineering
Don Hancock, SRIC
File: Red WIPP '10

Liner #	Description	Waste Stream	Pack Date	Canister	Steel Liner	Rigid Plastic Liner	Hanford Gross Wt. (kg)	Hanford Gross Wt. (lbs)	Liner Wt. (lbs.)	Sling Wt. (lbs.)	Drum Wt. (lbs.)	BCLDP Gross Wt. (lbs)	U517 Gross Wt. (lbs)	Waste Wt. (lbs)	Comments (Canister gross weights obtained from BCLDP records in U514)
BC0032	Inorganic Debris	SR-RL-BCLDP.001	12/8/1999		X		147.4	325.0	160.0	11.9	50.0	325	325	103.1	
BC0033	Inorganic Debris	SR-RL-BCLDP.001	1/4/2004		X		165.6	365.1	160.0	11.9	50.0	365	365	143.1	
BC0035	Organic Debris	SR-RL-BCLDP.001	12/27/1999		X		183.7	405.0	160.0	11.9	50.0	405	405	183.1	
BC0036	Organic Debris	SR-RL-BCLDP.001	6/13/2002	BCO-002	X		240.1	529.3	160.0	11.9	50.0	530	530	308.1	Liner gross wt. in canister 468 lbs
BC0037	Organic Debris	SR-RL-BCLDP.001	2/29/2000		X		149.7	330.0	160.0	11.9	50.0	330	330	108.1	
BC0039	Organic Debris	SR-RL-BCLDP.001	3/28/2001	BCO-003	X		152	335.1	160.0	11.9	50.0	335	335	113.1	Liner gross wt. in canister 273 lbs
BC0040	Inorganic Debris	SR-RL-BCLDP.001	1/10/2000		X		195.1	430.1	160.0	11.9	50.0	430	430	208.1	
BC0041	Organic Debris	SR-RL-BCLDP.001	10/11/2000		X		152.1	335.3	160.0	11.9	50.0	335	335	113.1	
BC0042	Inorganic Debris	SR-RL-BCLDP.001	1/24/2000		X		165.6	365.1	160.0	11.9	50.0	365	365	143.1	
BC0044	Inorganic Debris	SR-RL-BCLDP.001	2/4/2000		X		224.6	495.2	160.0	11.9	50.0	495	495	273.1	
BC0045	Inorganic Debris	SR-RL-BCLDP.001	2/7/2000		X		170.1	375.0	160.0	11.9	50.0	375	375	153.1	
BC0046	Inorganic Debris	SR-RL-BCLDP.001	2/16/2000		X		172.4	380.1	160.0	11.9	50.0	380	380	158.1	
BC0047	Organic Debris	SR-RL-BCLDP.001	3/1/2000		X		188.3	415.1	160.0	11.9	50.0	415	415	193.1	
BC0048	Inorganic Debris	SR-RL-BCLDP.001	4/7/2000		X		152	335.1	160.0	11.9	50.0	335	335	113.1	
BC0049	Inorganic Debris	SR-RL-BCLDP.001	3/10/2000		X		172	379.2	160.0	11.9	50.0	380	380	158.1	
BC0050	Organic Debris	SR-RL-BCLDP.001	3/10/2000		X		185.6	409.2	160.0	11.9	50.0	410	410	188.1	
BC0051	Inorganic Debris	SR-RL-BCLDP.001	8/15/2000		X		210.9	465.0	160.0	11.9	50.0	465	465	243.1	
BC0053	Inorganic Debris	SR-RL-BCLDP.001	4/25/2000		X		188.3	415.1	160.0	11.9	50.0	415	415	193.1	
BC0054	Inorganic Debris	SR-RL-BCLDP.001	6/6/2002		X		220	485.0	160.0	11.9	50.0	485	485	263.1	
BC0055	Organic Debris	SR-RL-BCLDP.001	4/11/2000		X		154.2	340.0	160.0	11.9	50.0	340	NR	118.1	
BC0056	Organic Debris	SR-RL-BCLDP.001	8/10/2000		X		174.6	384.9	160.0	11.9	50.0	385	NR	163.1	
BC0057	Organic Debris	SR-RL-BCLDP.001	5/2/2000		X		157.5	347.2	160.0	11.9	50.0	350	NR	128.1	
BC0058	Inorganic Debris	SR-RL-BCLDP.001	11/20/2002		X		211	465.2	160.0	11.9	50.0	465	465	243.1	
BC0059	Organic Debris	SR-RL-BCLDP.001	12/13/2000		X		149.8	330.3	160.0	11.9	50.0	330	330	108.1	
BC0060	Organic Debris	SR-RL-BCLDP.001	1/24/2002	BCO-003	X		165.6	365.1	160.0	11.9	50.0	NR	365	143.1	Liner gross wt. in canister 303 lbs
BC0061	Inorganic Debris	SR-RL-BCLDP.001	10/3/2000		X		183.7	405.0	160.0	11.9	50.0	405	405	183.1	
BC0062	Organic Debris	SR-RL-BCLDP.001	10/10/2000		X		175.1	386.0	160.0	11.9	50.0	385	NR	163.1	
BC0063	Inorganic Debris	SR-RL-BCLDP.001	11/8/2000		X		163.3	360.0	160.0	11.9	50.0	360	360	138.1	
BC0064	Inorganic Debris	SR-RL-BCLDP.001	1/15/2001		X		199.7	440.3	160.0	11.9	50.0	440	440	218.1	
BC0066	Organic Debris	SR-RL-BCLDP.001	10/16/2002		X		158.6	349.7	160.0	11.9	50.0	350	NR	128.1	
BC0067	Organic Debris	SR-RL-BCLDP.001	12/18/2000		X		163.4	360.2	160.0	11.9	50.0	360	NR	138.1	
BC0069	Inorganic Debris	SR-RL-BCLDP.001	12/18/2002		X		176.9	390.0	160.0	11.9	50.0	390	390	168.1	
BC0070	Organic Debris	SR-RL-BCLDP.001	6/5/2002		X		152	335.1	160.0	11.9	50.0	335	335	113.1	
BC0071	Inorganic Debris	SR-RL-BCLDP.001	1/8/2001		X		145.2	320.1	160.0	11.9	50.0	320	NR	98.1	
BC0073	Organic Debris	SR-RL-BCLDP.001	1/12/2001		X		156.5	345.0	160.0	11.9	50.0	345	NR	123.1	
BC0074	Inorganic Debris	SR-RL-BCLDP.001	1/16/2001		X		142.9	315.0	160.0	11.9	50.0	315	NR	93.1	
BC0075	Organic Debris	SR-RL-BCLDP.001	2/13/2002		X		181.4	399.9	160.0	11.9	50.0	400	400	178.1	
BC0077	Organic Debris	SR-RL-BCLDP.001	2/23/2001		X		156.4	344.8	160.0	11.9	50.0	345	345	123.1	
BC0079	Inorganic Debris	SR-RL-BCLDP.001	1/18/2001		X		188.3	415.1	160.0	11.9	50.0	415	NR	193.1	
BC0081	Inorganic Debris	SR-RL-BCLDP.001	5/21/2001		X		176.9	390.0	160.0	11.9	50.0	390	390	168.1	
BC0082	Organic Debris	SR-RL-BCLDP.001	3/1/2001		X		215.5	475.1	160.0	11.9	50.0	475	475	253.1	
BC0083	Inorganic Debris	SR-RL-BCLDP.001	5/28/2002		X		190.8	420.6	160.0	11.9	50.0	420	420	198.1	
BC0084	Inorganic Debris	SR-RL-BCLDP.001	6/11/2002		X		220	485.0	160.0	11.9	50.0	485	485	263.1	
BC0085	Inorganic Debris	SR-RL-BCLDP.001	5/21/2001		X		181.5	400.1	160.0	11.9	50.0	400	400	178.1	
BC0087	Inorganic Debris	SR-RL-BCLDP.001	6/26/2001		X		163.3	360.0	160.0	11.9	50.0	360	360	138.1	
BC0089	Inorganic Debris	SR-RL-BCLDP.001	7/31/2001		X		190.5	420.0	160.0	11.9	50.0	420	420	198.1	
BC0093	Organic Debris	SR-RL-BCLDP.001	4/19/2001		X		224.5	494.9	160.0	11.9	50.0	495	495	273.1	
BC0097	Organic Debris	SR-RL-BCLDP.001	7/25/2001		X		188.2	414.9	160.0	11.9	50.0	415	415	193.1	
BC0098	Organic Debris	SR-RL-BCLDP.001	8/17/2001		X		192.8	425.1	160.0	11.9	50.0	425	425	203.1	
BC0099	Inorganic Debris	SR-RL-BCLDP.001	7/30/2001		X		161.1	355.2	160.0	11.9	50.0	355	355	133.1	
BC0100	Inorganic Debris	SR-RL-BCLDP.001	10/16/2002		X		167.9	370.2	160.0	11.9	50.0	370	370	148.1	

Liner #	Description	Waste Stream	Pack Date	Canister	Steel Liner	Rigid Plastic Liner	Hanford Gross Wt. (kg)	Hanford Gross Wt. (lbs)	Liner Wt. (lbs.)	Sling Wt. (lbs.)	Drum Wt. (lbs.)	BCLDP Gross Wt. (lbs)	U517 Gross Wt. (lbs)	Waste Wt. (lbs)	Comments (Canister gross weights obtained from BCLDP records in U514)
BC0103	Inorganic Debris	SR-RL-BCLDP.001	10/25/2001		X		217.7	479.9	160.0	11.9	50.0	480	480	258.1	
BC0105	Organic Debris	SR-RL-BCLDP.001	10/25/2001		X		181.4	399.9	160.0	11.9	50.0	400	400	178.1	
BC0107	Organic Debris	SR-RL-BCLDP.001	11/16/2001		X		135.6	298.9	160.0	11.9	50.0	300	300	78.1	
BC0109	Inorganic Debris	SR-RL-BCLDP.001	11/1/2001		X		192.8	425.1	160.0	11.9	50.0	425	425	203.1	
BC0110	Inorganic Debris	SR-RL-BCLDP.001	11/17/2001		X		147.4	325.0	160.0	11.9	50.0	325	325	103.1	
BC0114	Organic Debris	SR-RL-BCLDP.001	12/8/2001		X		176.4	388.9	160.0	11.9	50.0	390	390	168.1	
BC0116	Inorganic Debris	SR-RL-BCLDP.001	1/12/2002		X		186	410.1	160.0	11.9	50.0	410	410	188.1	
BC0117	Organic Debris	SR-RL-BCLDP.001	12/31/2001		X		149	328.5	160.0	11.9	50.0	330	330	108.1	
BC0118	Inorganic Debris	SR-RL-BCLDP.001	2/13/2002		X		199.7	440.3	160.0	11.9	50.0	440	440	218.1	
BC0119	Organic Debris	SR-RL-BCLDP.001	1/11/2002		X		140.7	310.2	160.0	11.9	50.0	310	310	88.1	
BC0120	Organic Debris	SR-RL-BCLDP.001	12/28/2001		X		156.5	345.0	160.0	11.9	50.0	345	345	123.1	
BC0125	Organic Debris	SR-RL-BCLDP.001	2/11/2002		X		156.5	345.0	160.0	11.9	50.0	345	345	123.1	
BC0126	Organic Debris	SR-RL-BCLDP.001	2/11/2002		X		152.6	336.4	160.0	11.9	50.0	335	335	113.1	
BC0128	Organic Debris	SR-RL-BCLDP.001	4/2/2002		X		213.2	470.0	160.0	11.9	50.0	470	470	248.1	
BC0129	Inorganic Debris	SR-RL-BCLDP.001	10/16/2002		X		380.9	839.7	160.0	11.9	50.0	840	840	618.1	
BC0131	Organic Debris	SR-RL-BCLDP.001	3/28/2002		X		140.6	310.0	160.0	11.9	50.0	310	310	88.1	
BC0132	Inorganic Debris	SR-RL-BCLDP.001	4/2/2002		X		183.7	405.0	160.0	11.9	50.0	405	405	183.1	
BC0133	Inorganic Debris	SR-RL-BCLDP.001	4/17/2002		X		217.7	479.9	160.0	11.9	50.0	480	NR	258.1	
BC0134	Organic Debris	SR-RL-BCLDP.001	5/11/2002		X		181.3	399.7	160.0	11.9	50.0	400	400	178.1	
BC0135	Organic Debris	SR-RL-BCLDP.001	5/28/2002		X		136.1	300.0	160.0	11.9	50.0	300	300	78.1	
BC0136	Inorganic Debris	SR-RL-BCLDP.001	5/30/2002		X		376.5	830.0	160.0	11.9	50.0	830	830	608.1	
BC0139	Organic Debris	SR-RL-BCLDP.001	5/28/2002		X		197.2	434.8	160.0	11.9	50.0	435	435	213.1	
BC0142	Inorganic Debris	SR-RL-BCLDP.001	6/19/2002		X		215.6	475.3	160.0	11.9	50.0	475	475	253.1	
BC0143	Organic Debris	SR-RL-BCLDP.001	6/6/2002		X		154.3	340.2	160.0	11.9	50.0	340	340	118.1	
BC0144	Organic Debris	SR-RL-BCLDP.001	6/12/2002		X		161.1	355.2	160.0	11.9	50.0	355	355	133.1	
BC0145	Organic Debris	SR-RL-BCLDP.001	6/11/2002		X		129.3	285.1	160.0	11.9	50.0	285	285	63.1	
BC0146	Organic Debris	SR-RL-BCLDP.001	7/12/2002	BCO-003	X		142.9	315.0	160.0	11.9	50.0	315	315	93.1	Liner gross wt. in canister 253 lbs
BC0147	Organic Debris	SR-RL-BCLDP.001	8/23/2002	BCO-002	X		165.6	365.1	160.0	11.9	50.0	365	365	143.1	Liner gross wt. in canister 303 lbs
BC0149	Organic Debris	SR-RL-BCLDP.001	8/23/2002		X		156.5	345.0	160.0	11.9	50.0	345	345	123.1	
BC0150	Organic Debris	SR-RL-BCLDP.001	10/28/2002		X		122.5	270.1	160.0	11.9	50.0	270	270	48.1	
BC0159	Organic Debris	SR-RL-BCLDP.001	12/26/2002		X		142.9	315.0	162.0	11.9	50.0	315	315	91.1	Includes 2 lb. liner bag
BC0161	Organic Debris	SR-RL-BCLDP.001	12/27/2002		X		145	319.7	162.0	11.9	50.0	320	320	96.1	Includes 2 lb. liner bag
BC0141	Laundry Sock Filters w/absorbed water	SR-BCLDP.001.001	5/31/2002		X		163.3	360.0	160.0	11.9	50.0	360	360	138.1	
BC0130	Pressure Wash Filters w/absorbed water	SR-BCLDP.001.001	4/11/2002		X		201.9	445.1	160.0	11.9	50.0	445	445	223.1	
BC0138	w/absorbed water	SR-BCLDP.001.001	6/21/2002		X		204.2	450.2	160.0	11.9	50.0	450	450	228.1	
BC0160	Pressure Wash Filters w/absorbed water	SR-BCLDP.001.001	12/27/2002		X		188.2	414.9	162.0	11.9	50.0	415	415	191.1	Includes 2 lb. liner bag
BC0167	Pressure Wash Filters w/absorbed water	SR-BCLDP.001.001	3/13/2003		X		192.7	424.8	162.0	11.9	50.0	425	NR	201.1	Includes 2 lb. liner bag
BC0090	Laundry Sock Filters	SR-BCLDP.001.002	2/22/2001		X		145.1	319.9	160.0	11.9	50.0	320	320	98.1	
BC0091	Laundry Sock Filters	SR-BCLDP.001.002	5/30/2002		X		149.7	330.0	160.0	11.9	50.0	330	330	108.1	
BC0124	Pressure Wash Filters	SR-BCLDP.001.002	1/14/2002		X		165.6	365.1	160.0	11.9	50.0	365	365	143.1	
BC0127	Pressure Wash Filters	SR-BCLDP.001.002	1/26/2002		X		154.2	340.0	160.0	11.9	50.0	340	340	118.1	
BC0034	Slugs	SR-BCLDP.002	5/22/2002		X		224.5	494.9	160.0	11.9	50.0	495	495	273.1	Weight on video 49"?"
BC0153	Hydraulic Sludges	SR-BCLDP.003	10/9/2002		X		NR	NR	162.0	11.9	50.0	410	NR	186.1	Includes 2 lb. liner bag
BC0154	Hydraulic Sludges	SR-BCLDP.003	10/10/2002		X		NR	NR	162.0	11.9	50.0	415	NR	191.1	Includes 2 lb. liner bag
BC0155	Hydraulic Sludges	SR-BCLDP.003	10/10/2002		X		NR	NR	162.0	11.9	50.0	420	NR	196.1	Includes 2 lb. liner bag
BC0156	Hydraulic Sludges	SR-BCLDP.003	10/10/2002		X		NR	NR	162.0	11.9	50.0	435	NR	211.1	Includes 2 lb. liner bag

Liner #	Description	Waste Stream	Pack Date	Canister	Steel Liner	Rigid Plastic Liner	Hanford Gross Wt. (kg)	Hanford Gross Wt. (lbs)	Liner Wt. (lbs.)	Sling Wt. (lbs.)	Drum Wt. (lbs.)	BCLDP Gross Wt. (lbs)	U517 Gross Wt. (lbs)	Waste Wt. (lbs)	Comments (Canister gross weights obtained from BCLDP records in U514)
BC0157	Hydraulic Sludges	SR-BCLDP.003	10/11/2002		X		NR	NR	162.0	11.9	50.0	425	NR	201.1	Includes 2 lb. liner bag
BC0158	Hydraulic Sludges	SR-BCLDP.003	10/11/2002		X		NR	NR	162.0	11.9	50.0	415	NR	191.1	Includes 2 lb. liner bag
BC0165	Hydraulic Sludges	SR-BCLDP.003	3/12/2003		X		NR	NR	162.0	11.9	50.0	450	NR	226.1	
BC0001	Pool Filters	SR-BCLDP.004.002	5/5/1999			X	82.07	180.9	16.1	11.9	50.0	181	NR	103.0	
BC0009	Pool Filters	SR-BCLDP.004.002	6/1/1999			X	74.8	164.9	16.1	11.9	50.0	165	NR	87.0	
BC0012	Pool Filters	SR-BCLDP.004.002	6/22/1999			X	63.5	140.0	16.1	11.9	50.0	140	NR	62.0	
BC0017	Pool Filters	SR-BCLDP.004.002	7/28/1999			X	63.5	140.0	16.1	11.9	50.0	140	NR	62.0	
BC0021	Pool Filters	SR-BCLDP.004.002	8/5/1999			X	63.5	140.0	16.1	11.9	50.0	140	NR	62.0	
BC0038	Tri-Nuc Fillers	SR-BCLDP.004.003	4/12/2001		X		163.3	360.0	160.0	11.9	50.0	360	360	138.1	
BC0095	Tri-Nuc Fillers	SR-BCLDP.004.003	4/16/2001		X		138.5	305.3	160.0	11.9	50.0	305	305	83.1	
BC0137	Filter Resin	Low Level	5/14/2002		X		197.4	435.2	160.0	11.9	50.0	435	NR	213.1	
BC0140	Filter Resin	Low Level	5/14/2002		X		138.4	305.1	160.0	11.9	50.0	305	305	83.1	
BC0148	Inorganic Debris - Sabotage	High Level Waste	11/21/2002		X		379.6	836.9	577.7	11.9	50.0	835	NR	195.4	Liner includes, 135 kg. shield, pipe kg, dunnage 2.3 kgs.
BC0151	Hydraulic Sludges	CH - 80 mR/hr	10/9/2002		X		NR	NR	162.0	11.9	50.0	355	NR	131.1	Includes 2 lb. liner bag
BC0164	Hydraulic Sludges	Low Level	3/12/2003		X		197.3	435.0	162.0	11.9	50.0	435	NR	211.1	
BC0152	Hydraulic Sludges	CH - 150 mR/hr	10/9/2002		X		NR	NR	162.0	11.9	50.0	410	NR	186.1	Includes 2 lb. liner bag
BC0166	Hydraulic Sludges	CH - 150 mR/hr	3/12/2003		X		NR	NR	162.0	11.9	50.0	495	NR	271.1	
BC0024	Pool Filters	CH - 100 mR/hr	8/18/1999			X	63.5	140.0	16.1	11.9	50.0	125	NR	47.0	