

Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Monday, August 5, 2019 2:34 PM
To: Allen, Pam, NMENV
Subject: FW: NMED being included in Audit Caucuses

From: Maestas, Ricardo, NMENV
Sent: Tuesday, May 14, 2019 3:59 PM
To: Casey Gadbury <casey.gadbury@cbfo.doe.gov>; Dennis Miehl <dennis.miehl@cbfo.doe.gov>; Martin Navarrete <martin.navarrete@cbfo.doe.gov>
Cc: Kieling, John, NMENV <john.kieling@state.nm.us>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: NMED being included in Audit Caucuses

Hello Messrs. Gadbury, Miehl and Navarrete,

Since the Permit was first issued in 1999, the New Mexico Environment Department (NMED) has attended and observed over 100 audits to ensure that waste characterization activities are being performed in compliance with the WIPP Hazardous Waste Facility Permit (Permit) and the Permit Waste Analysis Plan (WAP). Throughout this time NMED has been included at the end of the day audit team caucuses and expects to continue to have this access. NMED views these end of the day caucuses as a critical part of the audit process. NMED expects to be able to observe these caucuses as necessary to help with the NMED review and validation of compliance with WAP requirements at each generator/storage site in accordance with WIPP Permit Part 2 and Permit Attachment C6.

Permit Part 2- *General Facility Conditions*,

Section 2.3.2.1. *Requirement to Audit*, states:

"DOE shall demonstrate to the Secretary that the generator/storage sites have implemented and comply with applicable requirements of the WAP by conducting audits as specified in Permit Attachment C, Section C-5a(3), and Permit Attachment C6 (Audit and Surveillance Program), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.13)."

Section 2.3.2.2. *Observation of Audit*, states:

"The Secretary may observe such audits as necessary to validate the implementation of and compliance with applicable WAP requirements at each generator/storage site. DOE shall provide the Secretary with a current audit schedule on a monthly basis and notify the Secretary no later than 30 calendar days prior to each audit."

Section 2.3.2.3. *Final Audit Report*, states:

"DOE shall provide the Secretary a final audit report as specified in Permit Attachment C6, and post a link to the final audit report transmittal letter on the WIPP Home Page and inform those on the e-mail notification list as specified in Permit Section 1.11. The final audit report shall include all information specified in Permit Attachment C6, Section C6-4, and:

- i. A detailed description of all corrective actions and the resolution of any corrective action applicable to WAP requirements, including re-audits if required;
- ii. All documentation necessary for the Secretary to determine if the corrective action was resolved."

Section 2.3.2.4. *Secretary Notification of Approval*, states:

"The Secretary shall approve DOE's final audit report by written notification to DOE that the applicable characterization requirements of the WAP at a generator/storage site and have been implemented."



Permit Attachment C6- *Audit and Surveillance Program*,
Section C6-1 *Introduction* states, "DOE will conduct these audits and surveillances at each site performing these activities in accordance with a standard operating procedure (SOP). **NMED personnel may observe these audits and surveillances to validate the implementation of WAP requirements** (Permit Attachment C) at each site."

Please let me know if you have any questions on this.
Thank you.

Ricardo Maestas

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