

**INTERIM AUDIT REPORT
RCRA DRAFT PERMIT
Appendix B6 Evaluation**

ENTERED

I. Purpose

- A. To determine the current level of generator storage site implementation and compliance ^{proposed} to the Waste Analysis Plan (WAP) in the NMED Draft Permit dated November 13, 1998 through the CAO audit process using the Draft Permit Attachment B6 checklist. ^{with}
- B. To identify areas requiring further assessment to determine compliance with the WAP using the Attachment B6 checklist. ^{proposed}
- C. To ^{assess} provide sufficient corrective actions to ^{address deficiencies with the proposed WAP.} any deficient areas to assure compliance.

II. Process

- A. Evaluate the RCRA Draft Permit Appendix B6 against the generator/storage site's TRU Waste programmatic documents and implementing procedures, and CAO Audit reports.
1. A crosswalk will be conducted between each "Question" posed in the B6 Checklist and the generator/storage site's program documents and implementing procedures.
 2. A determination will be made regarding the adequacy of the generator/storage site's documents in satisfying the checklist questions. Those documents that adequately address the requirement will be so indicated with a "Yes"; however, in cases where the documents do not appear to be adequate a "No" will be indicated along with an explanation and this will become part of the on-site audit.
 3. The generator/storage site's annual reevaluation audit and any recent relevant audits will be used to baseline the implementation of checklist requirements. Audit records, checklists, and interviews will be referenced to provide examples of implementation. Because CAO audits are conducted on a sample of requirements and activities, it is expected that some checklist items will need further evaluation at the on-site audits.
- B. Identify any current indeterminates or deficiencies.
- C. Prepare an audit plan focusing on the disconnects identified in Steps A.2 and 3.

III. Audit

- A. Audit Plan - Team Selection, Dates, Notifications, Purpose & Scope, Schedule (NMED will be invited to participate)
- B. Conduct of Audit
- C. Preliminary Results

IV. Interim Audit Report

- A. Assessment Report
1. Purpose/Scope
 2. Dates and Description of Audits Used for the Assessment
 3. Summary of Compliance with Attachment B6
 4. Narrative (organized by the sections of Attachment B-6 including organizations/activities audited and a detailed description of the process followed and determinations made)
 5. Requested Response Date

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- B. Corrective Action Report Documentation**
 - 1. Corrective Action Reports
 - 2. Site Corrective Action Plans
 - 3. Corrective Action Closure Documentation
- C. Completed Draft Permit Attachment B6 Checklist**

V. Additional Documentation

- A. Relevant Site Procedures (will be provided to NMBD as soon as practical before issuance of the Interim Audit Report)**