



Observer Inquiry Form

Observer: Steve Zappe/Connie Walker Date: 7/2/08 Tracking No. _____

Discussion of Request: CCP representatives indicate that no WAP-required WSPF or CIS were prepared for waste stream OR-REDC-RH-HET for Audit A-08-12. CCP states that there is no requirement to have these documents ready because ORNL has already been approved for S5000 waste, and thus no AK (or other) audit is technically required for the waste Summary Category Group (SCG) beyond those elements that are unique to the RH waste characterization process (e.g., VE procedures for RH waste, etc.). At all preceding audits that included RH waste, the RH waste characterization process was presented and evaluated more thoroughly, including review of draft WSPFs, CISs, etc.

While the Permit does not specify that an RH audit will be performed for each SCG, NMED (and the public) expect that the RH program will be thoroughly assessed by the Permittees at these audits. In the case of ORNL and other sites where only an RH waste stream was assessed, NMED expected that the waste stream would be ready for full evaluation, including a demonstration of Permit Attachment B6 compliance. To ensure a full evaluation of RH waste streams, the public expected NMED to fulfill its obligation to ensure all waste forms and categories would be sufficiently audited. Because the ORNL RH waste stream audit showed that hazardous waste code assignments required revisiting, and because the AKE has indicated that additional CH chemical data is being assembled that could impact HWN assignment, NMED believes it is important to have a complete characterization package, including the WSPF and CIS, as part of a complete audit.

NMED requests that the Permittees state their position on the evaluation of CH and RH waste characterization activities by SCG at audits. NMED may use the permit renewal process to formally address the need to clearly impose a requirement to perform RH-specific audits and RH-specific approvals.

ATL Response: Will submit Observer Inquiry to National TRU Programs for resolution.

Observer: Accept Response X Do Not Accept Response _____
(Provide Reason)

Inquiry Closed: Porf Martinez 7/8/08
ATL Date



Zappe, Steve, NMENV

From: Ledford, Wayne - CTAC [Wayne.Ledford@wipp.ws]
Sent: Monday, August 11, 2008 12:27 PM
To: Zappe, Steve, NMENV
Subject: RE: Need a copy of NMED's Observer Inquiry from A-08-12
Attachments: A-08-12 NMED Observer Inquiry Form.doc

Here you go.

From: Zappe, Steve, NMENV [mailto:steve.zappe@state.nm.us]
Sent: Monday, August 11, 2008 12:18 PM
To: Martinez, Porf - CTAC; Ledford, Wayne - CTAC
Subject: Need a copy of NMED's Observer Inquiry from A-08-12

Porf, Wayne -

Receiving the response to our Observer Inquiry from A-08-12 (ORNL/CCP) prompted me to look in my files for the inquiry itself. I don't seem to have it, and I forget if I handed you a hardcopy or, more likely, put it on a USB flash drive for you. I have since had my personal laptop stolen, along with the flash drive I may have used at the time, so I can't find my copy of our inquiry. Could you please send me an electronic copy for my records? Thanks!

Steve

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This inbound email has been scanned by the MessageLabs Email Security System.

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From: Zappe, Steve, NMENV

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