

**CLARIFICATION NUMBER CAO-00-030, REV. 1**  
**DATA REVIEW, VALIDATION, AND VERIFICATION ACTIVITIES**

**ISSUE**

1. Are the data listed in Section B-4a(5) only WWIS data? B-4a(5)
2. Do batch data reports have to include raw analytical data as indicated by Section B-4a(5) B-4a(5) and B3-10
3. Will CBFO allow sites to combine checklists, specifically, the technical supervisor and QA review checklists? B3-10a

**CONCLUSION**

1. No. The data in question include all of the raw data pertaining to waste characterization in compliance with the Permit. These data are presented in reports for validation, verification, and quality assurance, including batch data reports.
2. A permit modification was issued on July 21, 2000 that revised Section B-4a(5) to remove this requirement. This section now states that NMED can request the raw data to verify the validity of the audit process. Section B3-10 was also revised with the July 21, 2000 modification to clarify that the raw data must be maintained and readily available upon request.
3. Checklists may be combined, as appropriate. However, the two reviews must be clearly delineated on the checklists. Note the basis for completion of the checklists in Standard Operating Procedures.

**DISCUSSION**

1. The data in question include all of the raw data pertaining to waste characterization in compliance with the Permit. Permit Attachment B-4a(5) states:

Batch Data Reports will document the testing, sampling, and analytical results from the required characterization activities, and document required QA/QC activities. Data validation and verification at both the data-generation level and the project level will be performed as required by this Permit before the required data are transmitted to the Permittees (Permit Attachment B3). NMED may request, through the Permittees, copies of any Batch Data Report, and/or the raw data validated by the generator/storage sites, to check the Permittees' audit of the validation process.

3. Note that the NMED commented in the response to comments that the technical supervisor review and the Quality Assurance officer review cannot be combined into a single review. Therefore, while a single person may conduct this review, the two reviews must be clearly delineated in the checklists. Section B3-10a, which contains the data generation level review, validation, and verification requirements, states the following:

Data review, validation, and verification at this level involves scrutiny and signature release from qualified independent technical reviewer(s)<sup>1</sup>, technical supervisor(s), and a QA representative, as specified below. Individuals conducting this review, validation, and verification **must** use checklists that address all of the items included in this section.

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<sup>1</sup>Independent technical review is performed by a competent individual who is not directly responsible for performing the work.