



Department of Energy
 Field Office, Albuquerque
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

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 NEW MEXICO
 ENVIRONMENT DEPARTMENT

DEC 14 1994 10:22

OFFICE OF THE SECRETARY
Ken K
Teri D
no statement
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Kathleen M. Sisneros
 WWM Division Director
 New Mexico Environment Department
 Harold Runnels Building
 1190 St. Francis Drive
 P. O. Box 26110
 Santa Fe, NM 87502

Dear Ms. Sisneros:

The Department of Energy (DOE) welcomes the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) RCRA Hydrogeologic Evaluation of the Los Alamos National Laboratory (LANL) (enclosed). DOE anticipates this Environmental Protection Agency-New Mexico RCRA work grant, when complete, will support the Ground Water Protection Management Program Plan (GWPMP) being jointly developed by DOE/LANL/NMED Agreement in Principle (AIP) technical staffs.

The intent of the joint effort in fact is to ensure that the GWPMP meets the technical and regulatory requirements of DOE Order 5400.1, Environmental Protection Program, and Task III, Module VIII of the LANL HSWA Permit. DOE anticipates that the plan will be finalized early in the first quarter of 1995. Implementation of the plan is already beginning as LANL has appointed an interim project leader for Ground Water Protection to begin coordination of funding and technical issues between divisions.

As discussed with your AIP staff, the GWPMP is a living document that will be updated as new information becomes available and DOE recognizes that new information resulting from the RCRA work grant will be reviewed by the combined technical staffs and incorporated as necessary. Please note that the draft plan will be available in the next few weeks and will be forwarded by DOE for review by your AIP staff. Future technical review meetings will be scheduled in January and February to finalize the plan.

Ken Zamora, Scientech, LAAO, will be the NMED/LAAO point of contact you requested for the work grant, and Bruce Gallaher,



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Kathleen M. Sisneros

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ESH-18, LANL, will be the LANL facility contact. They can be reached at (505) 665-5047, and (505) 667-3040, respectively.

Sincerely,



Joseph C. Vozella
Acting Assistant Area Manager
Office of Environment and Projects

LAAMEP:2JV-024

Enclosure

cc w/enclosure:

- B. Koch, AAMEP, LAAO
- D. Erickson, ESH-DO, LANL,
MS-K491
- T. Baca, EM, LANL, MS-J591
- S. Rae, ESH-18, LANL,
MS-K497
- B. Gallaher, ESH-18, LANL,
MS-K497
- R. Hull, LATA, ESH-18, LANL,
MS-K497
- K. McAda, EPD, AL

cc w/o enclosure:

- B. Garcia, Bureau Chief
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
P. O. Box 26110
Santa Fe, New Mexico 87502
- R. Kern
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
P. O. Box 26110
Santa Fe, New Mexico 87502
- T. Davis
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, New Mexico 87502
- K. Zamora, Scientech, LAAO
- B. Swanton, AIP, LANL,
MS-J591

EP



State of New Mexico
ENVIRONMENT DEPARTMENT

Harold Runnels Building
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(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

BRUCE KING
GOVERNOR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 18, 1994

Mr. Larry M. Kirkman, Acting Area Manager
Department of Energy
Los Alamos Area Office, A-316
Los Alamos, New Mexico 87544

RE: RCRA Hydrogeologic Evaluation at Los Alamos National
Laboratory (LANL) FY95

Dear Mr. Kirkman:

The New Mexico Environment Department's (NMED) Hazardous and
Radioactive Materials Bureau's (HRMB) RCRA Program has committed
to conducting a hydrogeologic evaluation at LANL as part of an
EPA-New Mexico RCRA work grant negotiation for FY95. The scope
of the hydrogeologic evaluation includes the following:

NMED shall conduct a review of the available literature
concerning the ground-water monitoring at LANL for the
purpose of evaluating specific hydrogeologic requirements
outlined in LANL's HSWA Module VIII and the ground-water
monitoring requirements of RCRA. NMED shall summarize the
current status of knowledge pertaining to the main aquifer,
perched-intermediate aquifer(s), and alluvial aquifers as
determined by the literature search.

NMED shall prepare recommendations for work required by LANL
to meet the hydrogeologic requirements outlined in the HSWA
Module VIII. NMED shall recommend to EPA how the work
should be conducted in order to characterize the facility-
wide hydrogeology. The recommendations shall include
numbers and locations of wells to be installed and depths to
be monitored, as well as any other tests to be performed by
LANL. Ground-water monitoring requirements shall also be
included in the recommendation to EPA.

As past correspondence has indicated, NMED has expressed both
technical and regulatory concerns regarding the need for an
integrated program for a facility-wide hydrogeologic evaluation.
NMED recognizes DOE's current efforts to develop an adequate
ground-water monitoring system through the Ground Water
Protection Management Program Plan (GWPMPP) and Business Plan for
Ground Water Protection, March, 1994.



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The potential exists for NMED's hydrogeologic evaluation to positively impact DOE's current GWPMPP efforts and to focus direction of site-specific investigations. NMED hopes to coordinate with DOE/LANL to ensure that both technical and regulatory requirements are addressed during the development of both NMED's evaluation and DOE's GWPMPP. NMED wishes to continue discussions regarding progress made from both DOE's GWPMPP and NMED's hydrogeologic evaluation in subsequent meetings with NMED and DOE/LANL.

NMED's deadline for submittal of final recommendations to EPA is September 30, 1995. NMED has begun work on this project and hopes to complete the requirements of this commitment as soon as possible. NMED is requesting available documentation, data, and information necessary to meet the RCRA work grant requirements of the NMED hydrogeologic evaluation. NMED requests access to the following information within sixty (60) days of receipt of this letter in order to meet deadlines within NMED's grant commitment to EPA, provided the information is available within DOE/LANL's archives.

- 1) A comprehensive well record which includes all borehole logs across the facility.
- 2) Review of available borehole data for construction of various cross-sections and Potential Release Site (PRS) information across the facility.
- 3) Reports of all available aquifer characteristic tests which have been conducted across the facility.

Technical data requirements for this evaluation are quite detailed concerning facility-specific information (e.g. cross-sections, structure-contour maps, isopach maps, fence diagrams, etc.). For this reason, NMED requests permission to gain access to the Facility for Information Management, Analysis, and Display (FIMAD) and LANL's library.

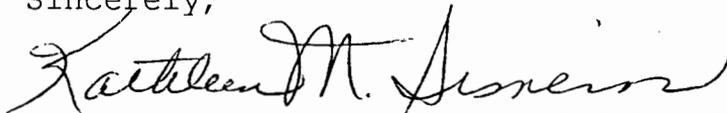
Issuance of a DOE/LANL uncleared (red) badge to Ms. Teri Davis would expedite access to the FIMAD system. Ms. Davis previously held a Q-clearance which only recently was terminated because she no longer works for the agreement-in-principle program of NMED. A DOE/LANL red badge would also aid in requested site-visits (e.g. to various springs, borehole and well locations, review of cores) across the facility and assist in NMED's access to the LANL library to conduct the required literature review. As the need arises, additional NMED RCRA personnel assigned to this project may also need issuance of an uncleared badge.

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As formerly mentioned, HRMB has developed a dialog with DOE/AIP (DOE Environmental, Safety, and Health Branch and Sciencetech) and LANL personnel through previous discussions concerning the GWPMPP. For this reason, NMED also requests that a DOE/AIP facility name be provided as a facility contact for NMED's hydrogeologic evaluation. NMED is wanting to proceed with the requirements of this project as soon as possible, therefore, NMED suggests that a facility contact name be afforded within fifteen (15) days of receipt of this letter.

Additional information may be requested as the need arises. Thank you for your attention to this matter. Should you have any questions please contact Mr. Benito Garcia of my staff at (505) 827-4358. Ms. Teri Davis or Mr. Ronald Kern of my staff at (505) 827-4308 are available to coordinate this effort with your staff at your convenience.

Sincerely,



Kathleen M. Sisneros, WWM Division Director
New Mexico Environment Department

cc: Barbara Driscoll, EPA Region VI
David Neleigh, EPA Region VI
Joseph Vozella, DOE

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November 7, 1994
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Bcc: Benito Garcia, HRMB Bureau Chief, NMED
Ronald Kern, RCRA Technical Program Manager, NMED
Teri Davis, RCRA Technical Program, NMED
Barbara Hoditschek, RCRA Permitting Program Manager, NMED
John Parker, DOE Oversight Program Manager, NMED
Bruce Swanton, DOE Oversight Program Manager, NMED

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