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August 22, 1995

Theodore J. Taylor, Program Manager
U.S. Department of Energy
Los Alamos Area Office, MS-A316
Los Alamos, NM 87544

Jorg Jansen, Project Manager
University of California
Environmental Restoration, MS-M992
Los Alamos, NM 87545

RE: DRAFT SITE-WIDE STUDY PLAN (SWSP)

Dear Mr. Taylor and Mr. Jansen:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) would like to thank the Los Alamos National Laboratory (LANL) for the opportunity to comment on the June 15, 1995 draft Site-Wide Study Plan (SWSP). HRMB agrees with the philosophy and in general with the technical approach presented within the SWSP. Given that LANL is currently conducting many Phase 2 RCRA Facility Investigations (RFI), HRMB is concerned with identifying and assuring closure of site-wide issues of necessity. As stated within the SWSP, "the remaining portion of the remediation decisions cannot be reached in an informed manner without significant additions to our (site-wide environmental setting) knowledge base".

The Director of NMED Water and Waste Management Division recently requested a RCRA Site-Wide Hydrogeologic Workplan be developed to assure that the HSWA hydrogeologic permit requirements and RCRA regulatory ground-water monitoring requirements are adequately addressed. HRMB recommends that the sections specific to hydrogeology within the proposed SWSP be incorporated into a comprehensive RCRA Site-Wide Hydrogeologic Workplan.

Specific recommendations on studies and prioritization of activities will be commented on by HRMB staff within the framework of the RCRA Site-Wide Hydrogeologic Workplan, as other activities will need to factor into the prioritization. From a RCRA standpoint, a site-wide hydrogeologic workplan must assess the potential impacts the laboratory operations have had on the ground-water regime and provide an adequate early detection system for the remaining potential release sites which require long-term ground-water monitoring.

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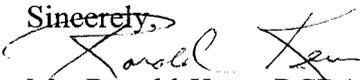
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HRMB currently reserves comment on the sections which are non-specific to hydrogeologic concerns. HRMB would invite presentations on such subjects as a means of educating and updating NMED staff on the issues at hand.

HRMB wishes to work closely with DOE\LANL on RCRA\HSWA Environmental Restoration (ER) related site-wide issues to assure that compliance is achieved. If you should have any questions or comments regarding this matter please contact me or Ms. Teri Davis of my staff at (505) 827-1560.

Sincerely,



Mr. Ronald Kern, RCRA Technical Compliance Program Manager
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, NMED
Ed Kelley, NMED
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Joseph Vozella, LAAO
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Greg Cole, LANL