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General



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

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Ed Kelly, Ph.D., Director  
Water and Waste Management Division  
New Mexico Environment Department  
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Dear Mr. Kelly:

Subject: Your August 17, 1995 Letter, Re: Comments Concerning Ground Water Contamination and Protection at Los Alamos National Laboratory (LANL), Los Alamos, New Mexico

The Department of Energy (DOE) Los Alamos Area Office (LAAO) and the Los Alamos National Laboratory (LANL) concur with the New Mexico Environment Department (NMED) Water and Waste Management Division assessment that a more comprehensive ground water monitoring system is desirable. DOE and LANL have been working on an enhanced Ground Water Protection Management Program Plan (GWPMP) since December 1993, to address similar conclusions of the LANL Self-Assessment, DOE Tiger Team, and NMED DOE Oversight Bureau (OB). DOE/LANL have coordinated this effort with NMED DOE OB and the Hazardous and Radioactive Materials Bureau (HRMB) staff to ensure, among other things, that the broad HSWA Permit requirements were met in addition to DOE Order 5400.1. This joint effort has resulted in the development of a management plan and a comprehensive business plan that has allowed DOE to successfully prioritize and budget for a well installation project in 1999.

At the April 13, 1995 GWPMP meeting, DOE/LANL agreed with NMED that final revisions to the plan were necessary to document the dynamic process by which the actual siting of the 23 proposed deep wells would occur. HRMB recommended that all existing hydrogeologic and geochemical data be pulled together into a 3-D stratigraphic computer model that could be used to ensure the consistency of existing data and updated as new data became available. This would ensure that existing data gaps were identified and, if possible, filled prior to siting wells. DOE/LANL indicated agreement with this recommendation and a general plan to utilize the interim period prior to funding of the new wells to fill data gaps by conducting the necessary studies. DOE/LANL also agreed to the formation of a subteam to document the process for inclusion in the GWPMP as well as integration of the ER Site-Wide Study Plan.

DOE agrees with NMED that the next logical step in implementation of ongoing ground water protection efforts is the development of a comprehensive ground water protection workplan that addresses, among other things, Resource



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Conservation and Recovery Act (RCRA) regulatory ground water monitoring concerns and HSWA hydrogeologic permit concerns. LAAO has requested that LANL formalize the Technical Review Committee (and the Program Management Committee) called for in the GWPMP to conduct the above subteam work. This committee will consist of members of key divisions conducting ground water protection activities including Environmental Management (EM) Programs; Earth and Environmental Sciences (EES); Chemical, Science and Technology (CST); Facilities, Safeguards and Security (FSS); and Environmental, Safety and Health (ESH). Development of the requested workplan will be given the highest priority along with completion of the GWPMP. This team will convene within the next several weeks to develop a charter inclusive of a mission statement, team membership/leadership, deliverables, aggressive schedule and identification of the management support team to ensure accountability.

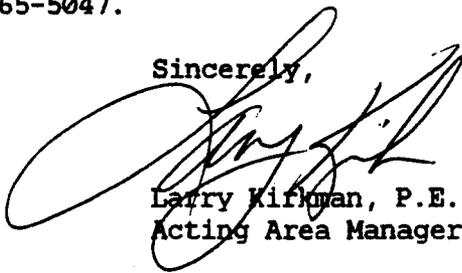
DOE intends for this effort to utilize the Environmental Protection Agency (EPA) Data Quality Objective Planning Process. LANL will soon be putting in place a permanent, full-time Project Leader for Ground Water Protection responsible for implementation of the program, and LAAO has appointed a coordinator to act as the DOE advocate to move this project along, especially through the critical planning stage. DOE/LANL request participation by NMED DOE OB and HRMB to ensure that a comprehensive workplan is developed that meets regulatory concerns. DOE/LANL also request a copy of the NMED Hydrogeologic Evaluation when it is complete. Upon completion, the workplan will be submitted to EPA and NMED for review and approval.

DOE requests a listing of the 271 ground water monitoring stations (wells) that NMED indicated exceeded DOE, EPA, and New Mexico State drinking water standards or maximum contaminant levels and NMED Water Quality Control Commission standards. The drinking water system has historically met all DOE, EPA, and New Mexico State drinking water standards or maximum contaminant levels for chemical or radiological constituents. Your letter appears to imply that groundwater used for drinking water is contaminated. DOE/LANL would like to meet in the near future with you and your staff to discuss the NMED ground water contamination concerns, including the 271 monitoring station results, tritium trend analysis, TW-3, on-site and off-site springs, and preliminary modeling of Mortandad Canyon results referenced in your August 17, 1995 letter.

DOE/LANL appreciate HRMB's offer to discuss the Denial of the LANL Ground Water Monitoring Waiver Requests and have requested the next monthly RCRA compliance meeting agenda with HRMB staff include this matter.

If you have any questions, please contact Ken Zamora, Office of Environment and Projects, at (505) 665-5047.

Sincerely,



Larry Kiffman, P.E.  
Acting Area Manager

LAAMEP: 7KZ-001

cc:  
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