LANL - ER - Misc

LANL General (Groundwater)

Marcy Neil Bentz

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

APR 5 1996

Dr. Ed. Kelley, Director
Water and Waste Management Division
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, New Mexico 87502

Dear Dr. Kelley:

Subject: Request for the Resource Conservation and Recovery Act (RCRA)/HSWA Regulatory Point of Contact

On August 17, 1995, you transmitted a letter to the Department of Energy (DOE) Los Alamos Area Office (LAAO) which, among other topics, requested the preparation of a RCRA site-wide hydrogeologic workplan that addresses both HSWA hydrogeologic permit requirements and RCRA regulatory ground water monitoring requirements. Shortly after receipt of your letter, LAAO and the Los Alamos National Laboratory (LANL) considered the preparation of this hydrogeologic workplan utilizing the Technical Review Committee (TRC) that was to be organized pursuant to LANL's Ground Water Protection Management Program Plan (GWPMPP). Our letter to you on October 2, 1995 and our letter to Barbara Hoditschek and Ronald Kern on December 1, 1995, articulated this approach to preparation of the hydrogeologic workplan.

On October 23, 1995, LAAO corresponded with Mark Weidler, Secretary, New Mexico Environment Department (NMED), requesting the participation of Teri Davis and Michael Dale of the NMED DOE Oversite Bureau on the TRC to ensure a comprehensive workplan is developed that meets regulatory concerns. Since that request, NMED has graciously responded, and NMED representatives have participated on the TRC, lending valuable, technical and regulatory insight to the meetings.

Most recently, LAAO and LANL have reconsidered the efficacy of utilizing the TRC as a subteam to prepare the hydrogeologic workplan, and decided to focus the TRC in its GWPMPP role and responsibility as a "technical review" body. Functionally, we have decided to place the lead responsibility for preparation of the hydrogeologic workplan on LANL's Water Quality and Hydrology Group (ESH-18), requesting that ESH-18 work in concert with other LANL groups and divisions. Complementing this decision, a project charter has been developed for preparation of the hydrogeologic workplan, that delineates roles and responsibilities and accountability (copy enclosed). Please note that the hydrogeologic workplan project charter explicitly requires extensive inter-Laboratory coordination and teaming, DOE/LANL coordination and teaming, and stakeholder involvement, including extensive coordination and communication with NMED. The TRC, in its technical review capacity, will still be integral to the preparation of a technically sound workplan.

The ESH-18 group and other LANL organizations that will assist in the preparation of the workplan, have jointly voiced the need to identify the individual(s) in NMED who will serve as a regulatory point of contact for preparation of the workplan. Although work had already begun on the workplan, and a process of establishing data quality objectives (DQO) has been implemented, questions regarding the RCRA/HSWA regulations, permit conditions, and their technical implementation will arise, and it is important to know precisely who to contact at NMED for this information. Although we understand that the contact(s) may be some of the same individuals participating in TRC activities, we would appreciate the name(s) of the NMED regulatory point of contact.

Thank you for your assistance in this matter. Be assured, we continue in our appreciation of the technical and regulatory expertise derived from NMED's participation on the TRC. We look forward to working cooperatively with NMED in the completion of the hydrogeologic workplan.

Sincerely,

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

LAAMEP:2KZ-016

Enclosure

cc w/enclosure:
K. Zamora, AAMEP, LAAO
M. Johansen, AAME, LAAO
J. Plum, AAMEP, LAAO
B. Koch, AAMEP, LAAO
R. Simeone, AAMEP, LAAO
T. Taylor, AAMEP, LAAO
S. Rae, (ESH-18/WQ&H:96-0096-1),
ESH-18, LANL, MS-K497
B. Gallaher, ESH-18, LANL, MS-K497
J. White, ESH-19, LANL, MS-K490
A. Barr, ESH-19, LANL, MS-K498
WQ&H, File, LANL, MS-K497
CRM-4, LANL, MS-A150
K. McAda, EPD, AL
J. Levings, ERD, AL

HYDROGEOLOGIC WORKPLAN
PROJECT CHARTER

A. Overview

1. Project Purpose

On August 17, 1995 the New Mexico Environment Department (NMED) transmitted a letter to the Department of Energy (DOE), Los Alamos Area Office (LAAO) regarding their comments concerning ground water contamination and protection at Los Alamos National Laboratory (Laboratory). The letter reiterated NMED's previous recommendations that the Laboratory develop a site-wide ground water monitoring system to ascertain the impacts of Laboratory operations on the ground water regime. The letter stated:

..."A plan is required to determine adequately the effect past, current, and future Laboratory operations have on the ground water regime...Basic geology, hydrogeology, and pathways for contaminant transport have not been adequately addressed to date...The lack of knowledge surrounding these fundamental hydrogeologic issues does not allow for compliance with the regulatory requirements of a site-wide characterization...".

..."During the course of NMED's investigation for the RCRA hydrogeologic evaluation, it has become evident to NMED that a RCRA site-wide hydrogeologic workplan should be developed and submitted to NMED and EPA for review and approval. A site-wide hydrogeologic workplan developed under the driver of RCRA will provide a mechanism to assure a compliance schedule with specific tasks to meet the permit objectives. The workplan should address both the HSWA hydrogeologic permit requirements and RCRA regulatory ground water monitoring requirements."...

The purpose of this project is to prepare a Hydrogeologic Workplan that defines and schedules cost-effective work activities that must be performed in order to meet regulatory requirements, and address issues presented in the Laboratory's Ground Water Protection Management Program (GWPMP) Plan. This project charter defines the process and methodologies that will be used to produce a Hydrogeologic Workplan.

2. Project Scope

The Hydrogeologic Workplan must describe and schedule those work activities necessary to ensure regulatory compliance with RCRA/HSWA, as well as other regulatory drivers. The workplan will also address issues presented in the Laboratory's GWPMP Plan. The workplan will consist of at least three broad sections. One section will be an introduction describing *why* a hydrogeologic workplan is needed, emphasizing regulatory requirements. The second section will describe the Laboratory's hydrogeologic setting as it relates to contaminant transport. This Laboratory setting will describe *what* the Laboratory's current knowledge of and interpretation of the ground water system is (elucidating knowledge gaps) in the format of a "preliminary hydrogeologic conceptual model". The third section will contain the work plan activities in a format that will: define, schedule, and estimate resources necessary to perform the work needed to describe *how and when* the "preliminary hydrogeologic conceptual model" will be completed and revised to satisfy regulatory requirements.

B. Hydrogeologic Workplan Project Management Steering Committee-Membership

The Hydrogeologic Workplan Project Management Steering Committee is established in order to provide coordinated Laboratory/DOE senior management insight, guidance and leadership for this Hydrogeologic Workplan Project. Membership of the senior management steering committee is comprised of the following individuals.

Dennis Erickson, Division Director, Environmental Safety and Health Division (ESH)

Wes Myers, Division Director, Earth and Environmental Sciences Division (ESS)

Thomas Baca, Program Director, Environmental Management Program (EM)

Bernie van der Hoeven, Division Director, Facilities, Security and Safeguards Division (FSS)

Joseph Vozella, Assistant Area Manager, Department of Energy (DOE) Los Alamos Area Office (LAAO)

The ESH Division Director will serve as Chair of the committee, with the ESS Division Director serving as co-Chair. The Management Steering Committee will meet as often as deemed necessary, or as requested by any of the stakeholders. The scheduled meetings will include briefings by the Project Leader, and designated staff. Issues requiring management attention or direction will be brought to the Management Steering Committee for action.

C. Hydrogeologic Workplan Project Planning Team-Membership

The Hydrogeologic Workplan Project Planning Team is established to establish the Data Quality Objectives (DQOs) for the Hydrogeologic Workplan. This planning team will meet frequently during the first quarter of 1996 to establish the DQOs for the preparation of the Hydrogeologic Workplan. Subsequently, additional meetings may be held to refine or further develop DQOs, as necessary. The work products of this planning team will be conveyed to the Ground Water Protection Management Program (GWPMP) Plan project leader for use in preparing the Hydrogeologic Workplan. Each planning team member shall represent a constituency (and stakeholders), be they: technical, regulatory, or management, ensuring adequate representation and comprehensive contributions to the process of establishing DQOs. In this regard, each planning team member is charged with the responsibility of conveying information to that constituency (and stakeholders) regarding the planning team's work efforts; and likewise serving as a conduit for information from the constituency (and stakeholders) to the planning team. Throughout their work, the planning team will maintain a professional dialogue with regulatory and technical representatives from the New Mexico Environment Department (NMED) so as to ensure that NMED recommendations and regulatory interpretations are considered during the preparation of the DQOs. The planning team will utilize an extended membership during their work efforts that includes NMED and the Technical Review Committee (TRC). The planning team is comprised of the following individuals.

Bruce Gallaher, ESH-18; Everett Springer, EES-15; Matt Johansen, DOE-LAAO; Alice Barr, ESH-19; Jody Plum, DOE-LAAO; Ken Zamora, DOE-LAAO; and Charlie Nylander, ESH-18.

D. Technical Review Committee-Membership

The Laboratory's Ground Water Protection Management Program (GWPMP) Plan establishes an advisory Technical Review Committee (TRC) that is responsible for evaluating the technical aspects of the GWPMP. The TRC will review and provide recommendations regarding the technical aspects of the Hydrogeologic Workplan. The following organizations are represented on the TRC.

	LANL
Chairperson, ESH-18	LANL GWPMPP Project Leader
ESH-18	Environmental Monitoring Program
EES-1	Earth and Environmental Sciences
EES-15	Environmental Restoration Project
CST-7	Waste Management Program
CST-14	Waste Management Program
	DOE
DOE/LAAO	Environmental Restoration Project
DOE/LAAO	Environment & Projects
DOE/LAAO	RCRA Compliance
DOE/AL	Environmental Protection Division
	NMED
NMED	Hazardous/Radioactive Materials Bur.
NMED	DOE/OB
NMED	Other Bureaus/Groups
SUPPORT ORGANIZATIONS	
LAAO/FSS-6	Project Management
ESH-18	Environmental Monitoring Program
ESH-19	RCRA Compliance
FSS-8	Utilities and Infrastructure
LATA	Environmental Monitoring Program

E. Laboratory Roles and Project Responsibilities

Successful project implementation requires a dedicated Laboratory team with the following project objectives. The project will be performed so that it:

- Satisfies the regulatory requirements;
- Meets the technical objectives and criteria and is defensible to DOE;
- Establishes a cost-effective workplan;
- Is managed within scope, cost, and schedule baselines;
- Demonstrates inter-Laboratory coordination and teaming;
- Demonstrates Laboratory-DOE coordination and teaming;
- Involves regulators and other stakeholders during its development; and
- Includes consideration for risk.

The roles and responsibilities in accordance with the Laboratory management structure are defined as follows.

EES Division Director—The ESS Division Director has overall responsibility for providing the appropriate technical resources and expertise to support preparation of the Hydrogeologic Workplan.

FSS Division Director—The FSS Division Director has overall responsibility for providing the appropriate technical resources and expertise to support preparation of the Hydrogeologic Workplan.

EM Program Director—The EM Program Director has overall responsibility for providing the appropriate technical resources and expertise to support the preparation of the Hydrogeologic Workplan.

ESH Division Director—As the "owner" of the Laboratory's environmental regulatory capabilities, the ESH Division Director has overall responsibility and accountability for providing the appropriate technical resources and expertise to achieve preparation of the Hydrogeologic Workplan.

ESH-18 Group Leader—The ESH-18 Group Leader is delegated the responsibility from the ESH Division Director to ensure that appropriate technical resources and expertise are provided to be responsible for the technical hydrogeologic aspects of the project, the regulatory aspects of the project as they relate to water quality regulations, and ensure that the project meets the institutional requirements of the Ground Water Protection Management Program (GWPMP) Plan. ESH-18 is responsible

and accountable for producing the Hydrogeologic Workplan within six months of receiving NMED's evaluation of ..."what work needs to be conducted and to what level of detail to assure compliance with both HSWA hydrogeologic permit requirements and the requirements for ground water monitoring of RCRA regulated units."...(NMED August 17, 1995 letter)

ESH-19 Group Leader—The ESH-19 Group Leader is delegated the responsibility from the ESH Division Director to ensure that appropriate technical resources and expertise are provided to support the regulatory aspects of the project as they relate to RCRA and HSWA.

F. Project Roles and Responsibilities

Responsibility for successful completion of the Hydrogeologic Workplan Project is held by the ESH Division Director, who has delegated that responsibility through the ESH-18 Group Leader, to the ESH-18 Project Leader.

ESH-18 Project Leader—The ESH-18, GWPMP Project Leader is responsible and accountable for producing the Hydrogeologic Workplan by the scheduled due date (schedule attached). The Project Leader is responsible for ensuring successful inter-Laboratory coordination and teaming, Laboratory-DOE coordination and teaming, and extensive coordination with external regulatory agency(s) and stakeholders.

Date 3/25/96

LANL
ESH _____
Dennis Erickson
Division Director

LANL
EES _____
Wes Myers
Division Director

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EM _____
Thomas Baca
Program Director

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FSS _____
Bernie van der Hoeven
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LAAO _____
Joseph Vozella
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