

Department of Energy

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

DEC 15 1999

James P. Bearzi
Hazardous and Radioactive Waste Bureau
New Mexico Environment Department
2044 Galisteo St., Building A
P.O. Box 26110
Santa Fe, New Mexico 87505

SUBJECT: SUPPLEMENTAL RESPONSE TO HYDROGEOLOGIC WORKPLAN
DATA QUALITY OBJECTIVES (LETTER, SEPTEMBER 10, 1999)

Dear Mr. Bearzi:

This letter supplements the December 2 correspondence from Mr. Charles Nylander of the University of California, and clarifies the Department of Energy (DOE) position on some of the Data Quality Objective issues. DOE generally concurs with Mr. Nylander's statements.

First, DOE understands that the Environmental Protection Agency's Technical Enforcement Guidance Document does not "specifically prohibit" drilling with mud for compliance with the Resource Conservation and Recovery Act. As NMED staff have indicated to DOE staff in the past, the status of a well drilled using mud rotary techniques being considered RCRA compliant would be evaluated on a case-by-case basis.

Secondly, DOE appreciates the efforts NMED has made in working cooperatively with us in an effort to streamline the Monitoring Well Installation Program costs. It is recognized that DOE was instrumental in recommending that the University of California reevaluate the well installation strategy to specifically include mud rotary techniques. During the September 13 LANL/NMED working session, mud rotary drilling was accepted with virtually unanimous consensus as a viable technical alternative to the advance casing air rotary approach, and could result in cost savings. Subsequent discussions on October 13-15 during the Hydrogeologic Characterization Program Quarterly Stakeholder meeting, with considerable input and recommendations from the External Advisory Group against mud drilling, resulted in a reconsideration and rejection of the mud rotary drilling strategy.



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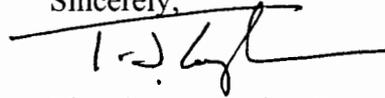
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Please feel free to call me at (505) 665-7203 if you have any questions or concerns.

Sincerely,



Theodore J. Taylor, Program Manager
Environmental Restoration Program

Cc:

J. Kieling, NMED/HRMB, Santa Fe, NM
J. Parker, NMED/DOE-OB, Santa Fe, NM
S. Yanicak, NMED/DOE-OB, Santa Fe, NM
J. Davis, NMED/SWQB, Santa Fe, NM
M. Leavitt, NMED/GWQB, Santa Fe, NM
D. Neleigh, EPA, 6PD-N, Dallas, TX
J. Vozella, DOE/LAAO, MS A316
G. Turner, DOE/LAAO, MS A316
T. Taylor, DOE/LAAO, MS A316
D. Erickson, ESH-DO, MS K491
S. Rae, ESH-18, MS K497
T. Baca, E-DO, MS J591
J. Canepa, E/ER, MS M992
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