

General

Subject: Modeling Workplan Responsibility

Date: Wed, 12 Apr 2000 17:19:45 -0600

From: James Bearzi <james_bearzi@nmenv.state.nm.us>

To: ttaylor@doeal.gov

Ted, sorry it's taken so long to get back to you on your April 6 e-mail about my modeling letter specifically, and the Hydrogeologic Workplan (HWP) in general, not being an ER responsibility. Our position is that the letter, and indeed all correspondence regarding the HWP, are part of permit requirements under the HSWA Module, Task III. (Facility Investigation). Furthermore, in the Introduction (page 1-1 & 1-2) of the HWP, all parties (because DOE/LANL submitted it, and NMED approved it) agree that "... the plan provides a characterization program that responds to groundwater monitoring waiver issues ... and requirements set forth in the HSWA portion of the Laboratory's RCRA operating permit. The permit requires that correspondence be sent to the Lab Director or his designee (for the operator), and to the DOE Area Manager or his designee (for the owner). I don't believe the permit makes any distinctions between ER, DP, ESH, or any lab divisions, nor should it. It is frankly not our concern.

IFET

Let me know if you want to discuss this further, but we're going to continue to consider HWP issues as permit issues, and route our correspondence accordingly.

-- BRZ



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