

General



*Environmental Protection Division  
Water Quality & RCRA (ENV-RCRA)*  
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(505) 667-0666/FAX: (505) 667-5224

Date: June 12, 2007  
Refer To: ENV-RCRA: 07-139

Mr. James Bearzi  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

**SUBJECT: DECISION TREE FOR MANAGEMENT OF INVESTIGATION-  
DERIVED WASTE SOLIDS FROM DRILLING OPERATIONS AT  
LOS ALAMOS NATIONAL LABORATORY**

Dear Mr. Bearzi:

This letter is in follow-up to the e-mail sent by Mr. John Young to Laboratory staff on March 16, 2007, concerning development of a process for evaluating the suitability of environmental media from drilling operations for reuse in site restoration, provided as Enclosure 1.

The Laboratory initially requested approval of standard characterization and disposal methods for Investigation Derived Waste (IDW) from construction of groundwater wells and boreholes in a letter dated June 28, 2005 (ER2005-0421), which was re-issued with updates on September 29, 2006 (EP2006-0868).

Mr. Young's e-mail served as an initial approval to proceed with the request that we follow up with an approach similar to the NOI decision tree for drilling, development, rehabilitation, and purge waters that NMED and the Laboratory collaboratively developed and was approved by NMED on November 21, 2006. The decision tree for IDW solids is provided as Enclosure 2.

Please review and advise as to whether the NMED approves of the decision tree as provided herein, or if you have any comments or concerns that require revision. If you have any questions, please contact me at 667-0666 or Gene Turner at 667-5794.

Sincerely,

Anthony R. Grieggs  
Group Leader  
Water Quality & RCRA (ENV-RCRA) Group



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ARG:KV/tag

Enclosures: a/s

Cy: John Young, NMED/HWB, Santa Fe, NM, w/enc.  
David Cobrain, NMED/HWB, Santa Fe, NM, w/enc.  
Gene Turner, LASO/EO, w/enc., MS A316  
Michael B. Mallory, PADOPS, w/o enc., MS A102  
Richard S. Watkins, ADESHQ, w/o enc., MS K491  
Tori George, ENV-DO, w/enc., MS J978  
Kelly VanDerpoel, ENV-RCRA, w/enc., MS K490  
Michael Alexander, ERSS-RS, w/enc., MS K497  
Mark Everett, ERSS-RS, w/enc., MS K497  
Matt Riggs, LWSP, w/enc., MS M992  
Tina Behr-Andres, LWSP, w/enc., MS M992  
Water Stewardship Project File, w/enc., MS M992  
ENV-RCRA File, w/enc., MS K490  
IRM-RMMSO, w/enc., MS A150

*Enclosure 1*

## Kelly VanDerpoel

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**From:** Young, John, NMENV [john.young@state.nm.us]  
**Sent:** Friday, March 16, 2007 4:38 PM  
**To:** kmv@lanl.gov; Danny Katzman  
**Subject:** IDW Approval

Kelly and Danny-

In the interest of time, I've quickly looked over the request for approval of Characterization and Disposal Methods for Investigation-Derived Waste from Groundwater Wells and Boreholes Constructed at Los Alamos National Laboratory and agree you may proceed. In general, we have few concerns regarding the approach outlined i.e.: 1) is it a hazardous waste and 2) are the constituents below a New Mexico site-specific screening level. If no to hazardous waste and the concentrations are below New Mexico SSL's, then the cuttings may be used for site restoration or be left in place. If the waste characterization data indicates that the cuttings may be left in place, we do require that the pit liner be removed (I believe you do this anyway). Also, if the cuttings are identified as hazardous and/or contain contaminants above an SSL or an LDR then waste must be removed and disposed of accordingly. All IDW decisions and analytical results must be documented and reported appropriately.

However, before we approve the September 2006 request we should spend some time to update it and perhaps follow an approach similar to the NOI for purge and development water that we collaboratively developed.

Let me know if you have any questions.

john

The Hazardous Waste Bureau has switched to a new phone system. My new contact information is:

Phone: (505) 476-6038  
Fax: (505) 476-6030  
Main: (505) 476-6000

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6/8/2007

***Enclosure 2***



