

General



Environmental Protection Division
Water Quality & RCRA Group (ENV-RCRA)
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: November 2, 2009
Refer To: ENV-RCRA-09-194
LA-UR: 09-06934

Mr. William C. Olson, Chief
Ground Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P.O. Box 2611
Santa Fe, New Mexico 87502

Mr. James P. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East
Building 1
Santa Fe, New Mexico 87505-6303

Dear Mr. Olson and Mr. Bearzi:

SUBJECT: LANL DRILLING, DEVELOPMENT, REHABILITATION, AND SAMPLING PURGE WATER DECISION TREE DRAFT REVISIONS

Los Alamos National Laboratory (LANL) is in receipt of your October 2, 2009, letter (Enclosure 1) containing the New Mexico Environment Department's proposed revisions of the *Drilling, Development, Rehabilitation, and Sampling Purge Water Decision Tree* (Decision Tree). Your letter requested LANL's review and comment on the draft revised Decision Tree no later than November 2, 2009. Enclosure 2 contains LANL's proposed revisions of the draft Decision Tree; LANL's revisions are presented in red to distinguish them from the yellow highlight used by your agency.

On October 20, 2009, staff from LANL's Water Quality & RCRA Group (Bob Beers and Mike Saladen) met with New Mexico Environment Department (NMED) Ground Water Quality Bureau staff (Robert George and Jennifer Fullam) to review the NMED's draft proposed revisions of the Decision Tree. The discussion topic of primary concern for both parties was the routine reporting of land application data by LANL to the NMED. Several potentially acceptable reporting options were evaluated during the meeting; LANL has attempted to capture one of these options in the revisions proposed in Enclosure 2. Most importantly, we appreciated the opportunity to meet with your staff for a technical dialogue on a matter important to both the NMED and LANL.

Please call me at (505) 667-7969 if you have questions or concerns regarding LANL's proposed revisions to the Decision Tree.

Sincerely,

Bob Beers
Water Quality & RCRA Group



BB/lm

Enclosures: a/s

Cy Steve Yanicak, LASO-GOV, w/enc., M894
Gene Turner, LASO-EO, w/enc., A316
Hai Shen, LASO-EO, w/enc., A316
Michael B. Mallory, PADOPS, w/o enc., A102
Chris Cantwell, ADESHQ, w/o enc., K491
Mike Saladen, ENV-RCRA, w/enc., K490
Tim Goering, WES-RS, w/enc., M992
Mike Alexander, WES-RS, w/enc., K497
ENV-DO File, w/o enc., J978
ENV-RCRA File, w/enc., K490
IRM-RMMSO, w/enc., A150

ENCLOSURE 1



NEW MEXICO
ENVIRONMENT DEPARTMENT
Water and Waste Management Division



BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

1190 South St. Francis Drive
P.O. Box 5469, Santa Fe, NM 87502-6110
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RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 2, 2009

Gene Turner, DOE/AIP/POC
U.S. Department of Energy
Los Alamos Site Office, MS A316
528 35th Street
Los Alamos, NM 87545

Tori George, LANL-EP-RS
Los Alamos National Security, LLC
P.O. Box 1663 MS M992
Los Alamos, New Mexico 87545-0001

Re: LANL Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree Draft Revisions

Dear Mr. Turner and Ms. George:

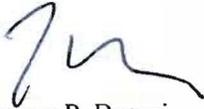
The attached “Los Alamos National Laboratory Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree” (Decision Tree) is a guidance document that has been prepared by the New Mexico Environment Department (NMED) to provide the Los Alamos National Laboratory owner and operators (LANL) with direction regarding the discharge of ground water associated with the drilling, development, rehabilitation and routine sampling of monitoring wells located throughout the facility. This document provides a mechanism for determining the appropriate fate of such waters in accordance with State regulations. LANL must demonstrate that these discharges do not pose a threat to human health or the environment by following the Decision Tree. Inadvertent discharges to the environment which do not specifically adhere to the Decision Tree and contain water contaminants that may, with reasonable probability, pose a threat to the environment or human health must continue to be reported following the procedures outlined in Section 1203 of the Water Quality Control Commission Regulations (20.6.2 NMAC).

The attached document contains proposed revisions intended to clarify and/or correct elements of the guidance that have been noted to be problematic by NMED and LANL (the revised sections are highlighted). NMED is requesting that LANL review and comment on this draft revised Decision Tree so that its use can be approved by NMED. Please be aware that there may be additional reporting requirements to maintain compliance with other regulatory programs. NMED reserves the right to modify, amend or

Mr. Turner and Ms. George
October 2, 2009
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retract this document as it pertains to compliance with the Water Quality Control Commission's Water Quality Regulations (20.6.2 NMAC) or the New Mexico Hazardous Waste Act (74-4 *et. seq.*, NMSA 1978). Please submit any comments regarding the revised decision tree to the Ground Water Quality Bureau by **November 2, 2009**.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau



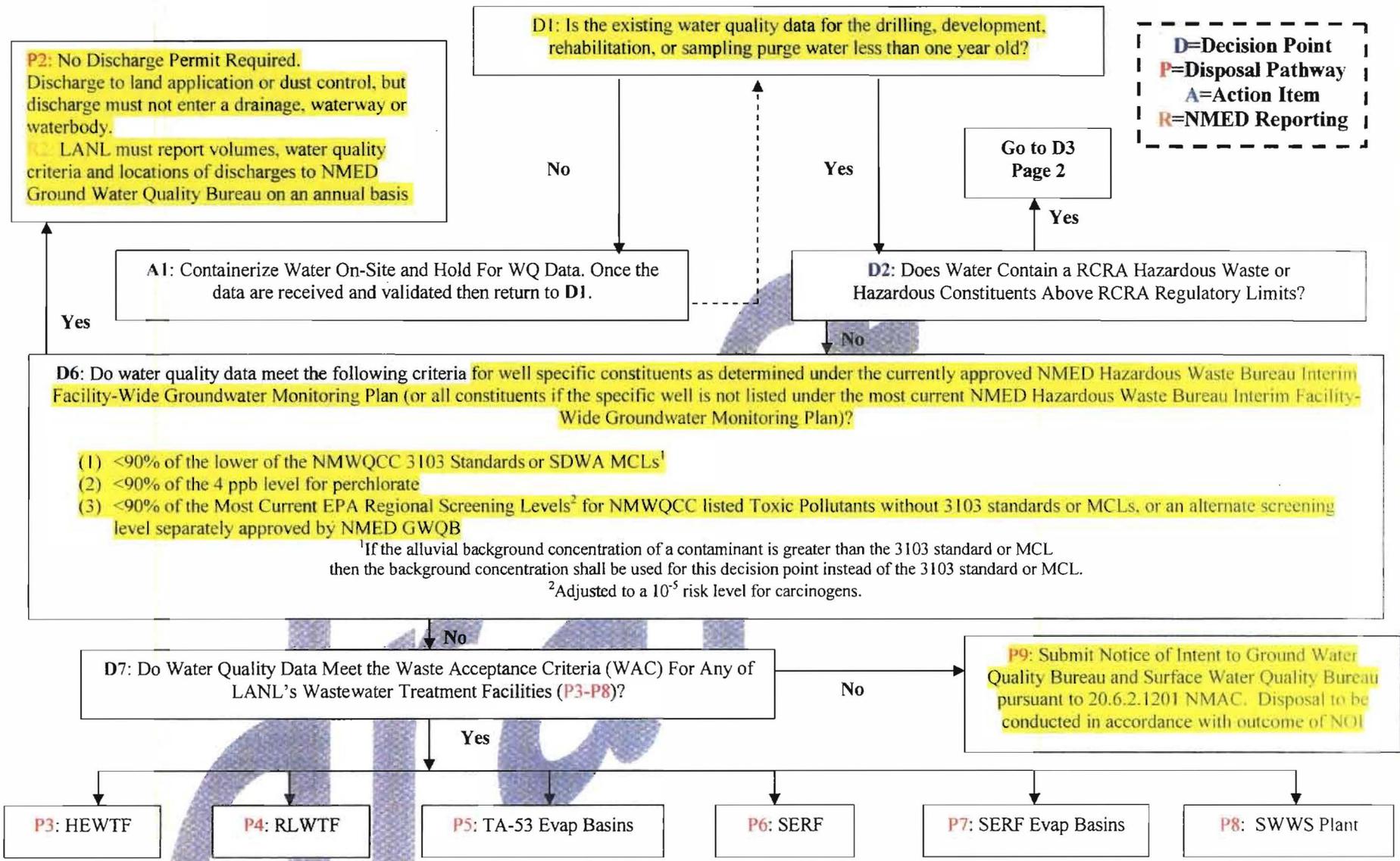
William C. Olson
Chief
Ground Water Quality Bureau

JB & WO:jf

Enc: Draft Revised Los Alamos National Laboratory Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree
Los Alamos National Laboratory Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree (Current Revision dated July 26, 2006)

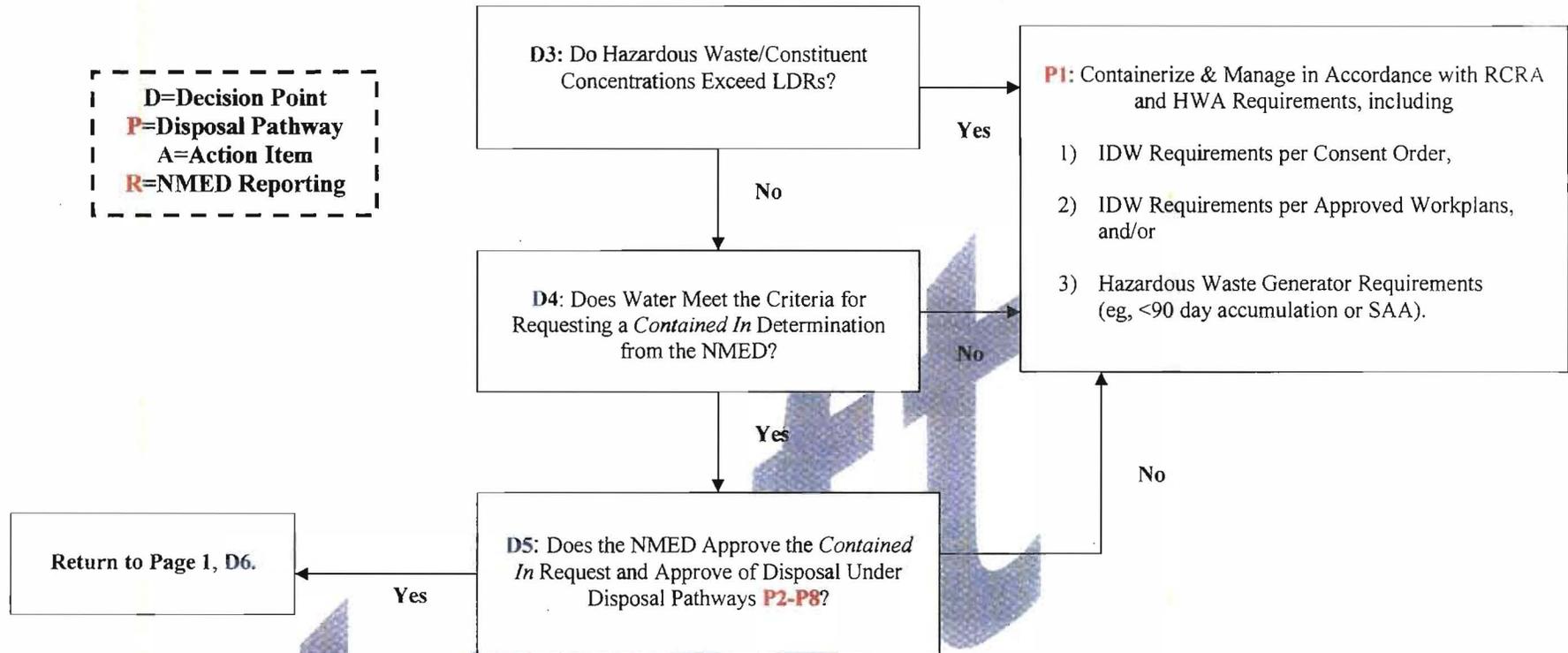
cc: Robert Beers, ENV-RCRA, Los Alamos National Laboratory, P.O. Box 1663 MS K497, Los Alamos, New Mexico 87545-0001
Hai Shen, LASO-EO, P.O. Box 1663, MS A316, Los Alamos, New Mexico 87545-0001
Michael Mallory, PADOPS, LANL, LLC, P.O. Box 1663, MS A102, Los Alamos, New Mexico 87545-0001
Chris Cantwell, ADESHQ, P.O. Box 1663, MS K491, Los Alamos, New Mexico 87545-0001
Michael Saladen, ENV-RCRA, LANL, LLC, P.O. Box 1663, MS K490, Los Alamos, New Mexico 87545-0001
Danny Katzman, LWSP, P.O. Box 1663, MS M992, Los Alamos, New Mexico 87545-0001
Tim Goering, WES-RS, P.O. Box 1663, MSM992, Los Alamos, New Mexico 87545-0001
Mike Alexander, WES-RS, P.O. Box 1663, MS K497, Los Alamos, New Mexico 87545-0001
Marcy Leavitt, Director, NMED Water and Waste Management Division
Dave Cobrain, NMED/HWB
Steven Connolly, NMED/HWB
Steve Yanicak, NMED/DOE OB
Ralph Ford-Schmid, NMED/DOE OB
Erik Galloway, NMED/DOE OB
Glenn Saums, NMED/SWQB
Richard Powell, NMED/SWQB
Robert George, NMED/GWQB
Jennifer Fullam, NMED/GWQB

Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree—Revised 10/02/09



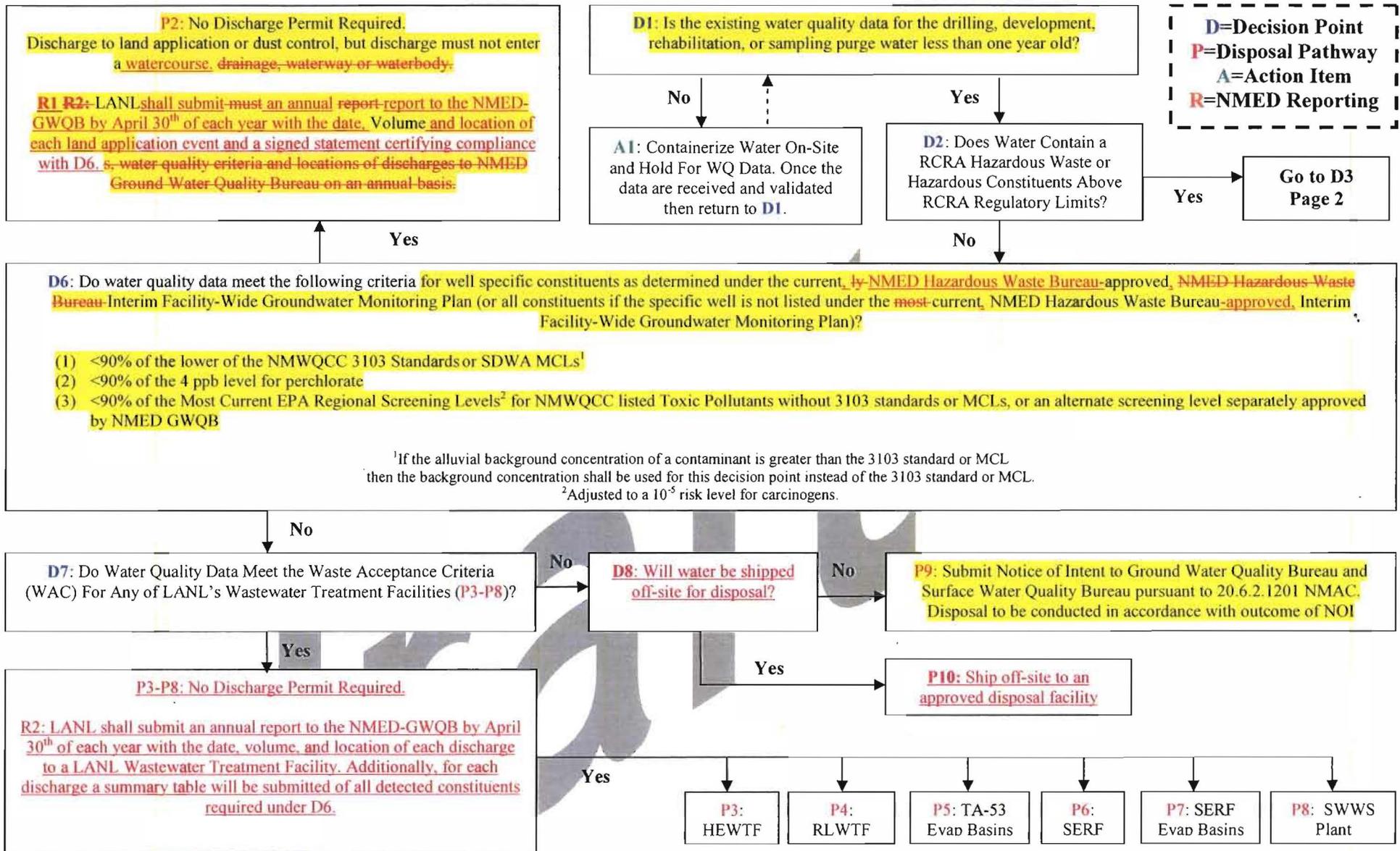
Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree—Revised 10/02/09

D=Decision Point
 P=Disposal Pathway
 A=Action Item
 R=NMED Reporting



ENCLOSURE 2

Drilling, Development, Rehabilitation and Sampling Purge Water Decision Tree—Revised 10/02/09–10/23/09



D=Decision Point
P=Disposal Pathway
A=Action Item
R=NMED Reporting

