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June 8, 2004

Mr. David Cobrain
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building One
Santa Fe, New Mexico 87505-6303



Reference: Work Assignment No. Y513, 06110.150; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Research and Permitting Support for the Los Alamos National Laboratory; Review of Selected LANL Environmental Restoration (ER) Project Standard Operating Procedures (SOPs); Task 4 Deliverable

Dear Mr. Cobrain:

On May 24, 2004 we submitted a deliverable that consisted of review comments on twelve (12) Los Alamos National Laboratory (LANL) Environmental Restoration (ER) Project Standard Operating Procedures (SOPs). Three of the SOPs addressed in this deliverable were: ER-SOP-5.03, Revision (Rev.) 2; Monitoring Well and RFI Borehole Abandonment; ER-SOP-06.26, Rev. 2, Core Barrel Sampling for Subsurface Earth Materials; and ER-SOP-12.01, Rev. 4, Field Logging, Handling, and Documentation of Borehole Materials.

Section IX.A (LANL SOPs) of the LANL Administrative Order (the Order), states that ER-SOP-5.03, Rev. 2, ER-SOP-06.26, Rev. 1, and ER-SOP-12.01, Rev. 4 had been reviewed and approved by the Department. Our review of ER-SOP-06.26, Rev. 1 (including the more recent revision of ER-SOP-06.26, Rev. 2) and ER-SOP-12.01, Rev. 4 indicated that the SOPs were consistent with EPA guidance and industry practices and therefore, consistent with the Order.

However, two comments were noted in the May 24th deliverable for ER-SOP-5.03, Rev. 2. While the procedures described in this SOP appear adequate and consistent with EPA and general industry practices, it should be noted that Section X.D. of the Order describes two additional well abandonment methods that were not discussed in this SOP. These methods include: (1) the use of a tapered wedge assembly or solid-stem auger for extracting large diameter casings and screens, and (2) drilling/grinding out damaged casings and screens with a roller cone bit, drag bit, or carbide tooth bit. As part of our review was to ensure the SOPs were consistent with the technical approaches outlined in



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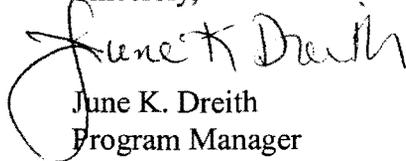


Mr. David Cobrain
June 8, 2004
Page 2

the Order, our comments may be in conflict with the Order, as the Department previously approved the SOP. The Department may wish to consider these comments for ER-SOP-5.03, Rev. 2. accordingly.

If you have any questions, please feel free to contact me at (303) 763-7188 or Ms. Paige Walton at (801) 451-2978.

Sincerely,



June K. Dreith
Program Manager

cc: Mr. John Young, NMED
Mr. James Ashworth, TechLaw
Ms. Paige Walton, TechLaw