

General

INTER



**Environmental Protection Division
Environmental Compliance Programs (ENV-CP)**
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

**National Nuclear Security Administration
Los Alamos Field Office, A316**
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: **OCT 20 2015**
Symbol: ENV-DO-15-0286
LA-UR: 15-27752
Locates Action No.: N/A

Ms. Michelle Hunter, Bureau Chief
Ground Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2250
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502

Mr. John E. Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Ms. Hunter and Mr. Kieling:

Subject: Request for Approval – Proposed Revisions to the 2007 Decision Tree for Management of Investigation Derived Waste (IDW) Solids from Drilling Operations

On June 18, 2015, the U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) (ENV-DO-15-0121) submitted a letter to John E. Kieling (New Mexico Environment Department (NMED) Hazardous Waste Bureau) and Michelle Hunter (NMED-Ground Water Quality Bureau), requesting approval for a minor revision to the 2007 Notice of Intent (NOI) Decision Tree. The first proposed revision to the Decision Tree includes removing the following criterion from Decision Box D6:

- *Less than applicable Land Disposal Restrictions (LDR) treatment standards.* LDR treatment standards only apply to hazardous waste, and in order to reach D6, the drill cuttings must be non-hazardous. Therefore, it is not appropriate for this criterion to be included in D6.

On September 10, 2015, an email was sent to NMED-HWB and NMED-GWQB requesting an additional revision to the 2007 Decision Tree. The revision included adding the following note to the bottom of page one (1) of Decision Tree:

Note: *If rain water collects in the cuttings pit, it will be characterized, based upon the analytical results of the environmental media (e.g. drilling fluids or drill cuttings) in which it came into contact, and discharged if land application criteria are met.*



We look forward to receiving your response on the two (2) proposed revisions to the 2007 Notice of Intent to Discharge (NOI) Decision Tree for the land application of drill cuttings (See Enclosure 1).

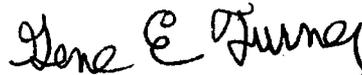
If you have questions or need additional information, please contact Jocelyn Buckley at (505) 665-5209 or via e-mail at jbuckley@lanl.gov.

Sincerely,



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security, LLC

Sincerely,



Gene E. Turner
Environmental Permitting Manager
National Security Missions
Los Alamos Field Office
U.S. Department of Energy

AMD:GETMTS:JYB/lm

Enclosure: (1) Decision Tree for the Land Application of Drill Cuttings

Cy: Kathryn Roberts, NMED/RPD, Santa Fe, NM, (E-File)
David Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Michael Dale, NMED/HWB, Santa Fe, NM, (E-File)
Ben Wear, NMED/HWB, Santa Fe, NM (E-File)
Steven Pullen, NMED/GWQB, Santa Fe, NM, (E-File)
Steve Huddleson, NMED/GWQB, Santa Fe, NM, (E-File)
James Hogan, NMED/SWQB, Santa Fe, NM, (E-File)
Steve M. Yanicak, NMED/DOE/OB, (E-File)
Gene E. Turner, LASO-NS-LP, (E-File)
Jordan Arnsward, LASO-NS-PI, (E-File)
David Rhodes, EM-SG, (E-File)
Cheryl Rodriguez, EM-SG, (E-File)
Annette Russell, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
Amy E. De Palma, PADOPS, (E-File)
Randal Erickson, ADEP, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Michael Saladen, ENV-CP, (E-File)
Robert S. Beers, ENV-CP, (E-File)
Jocelyn Buckley, ENV-CP, (E-File)
John Valdez, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)

Ms. Michelle Hunter & Mr. John E. Kieling
ENV-DO-15-0286

- 3 -

Cy (continued):

locatesteam@lanl.gov, (E-File)

Emla.docs@em.doc.gov, (E-File)

epccat@lanl.gov, (E-File)

env-correspondence@lanl.gov, (E-File)

ENCLOSURE 1

Decision Tree for the Land Application of Drill Cuttings

ENV-DO-15-0286

LA-UR-15-27752

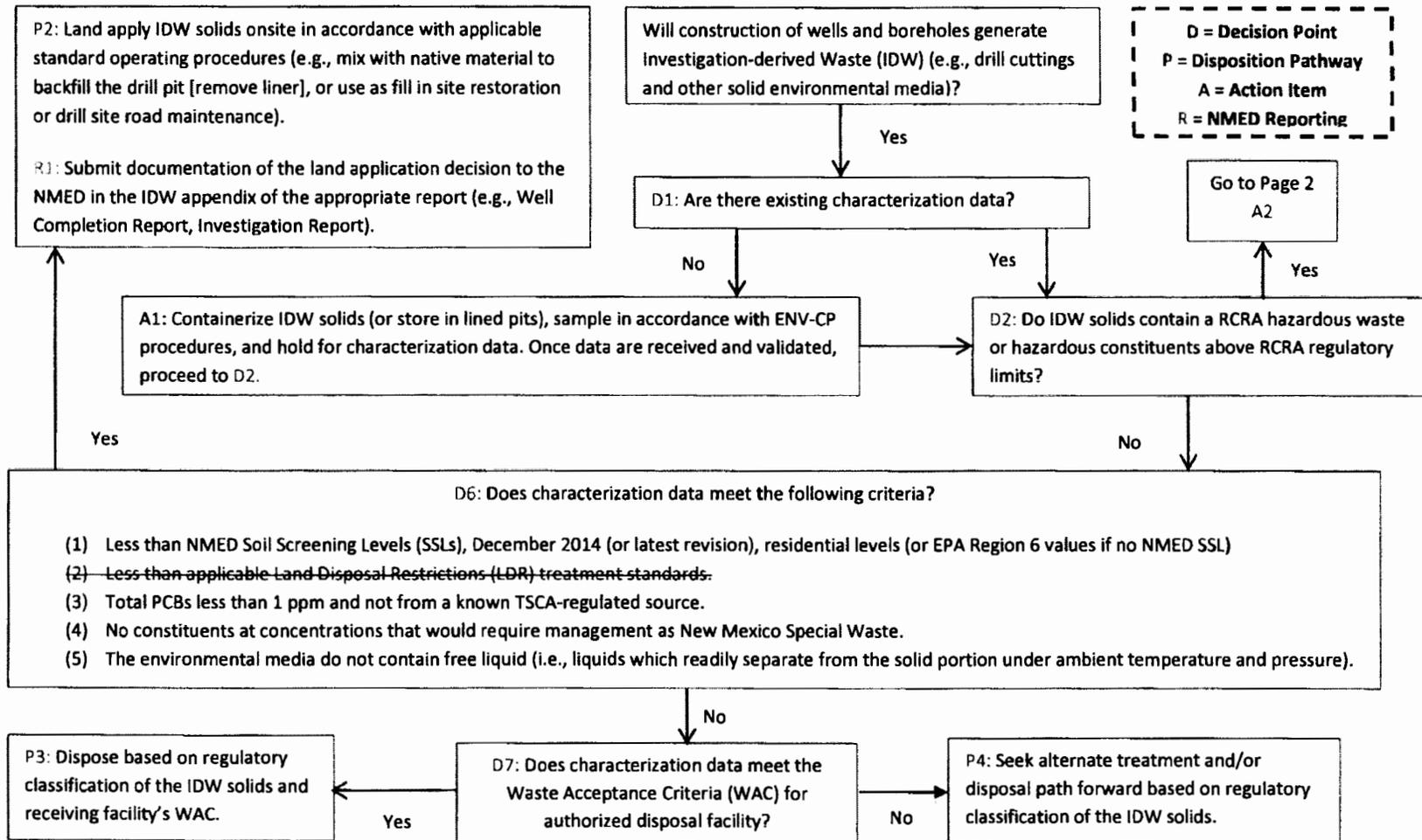
Date: OCT 20 2015

Decision Tree

Decision Tree

October 2015

Land Application of Drill Cuttings



Note: If rain water collects in the cuttings pit, it will be characterized, based upon the analytical results of the environmental media (e.g. drilling fluids or drill cuttings) in which it came into contact, and discharged if land application criteria are met.

Decision Tree (Page 2)

Decision Tree

October 2015

Land Application of Drill Cuttings

