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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

July 6, 1998

Mr. Theodore Taylor, Area Manager  
Los Alamos Area Office-Department of Energy  
528 35<sup>th</sup> Street  
Los Alamos, New Mexico 87544

Dr. John Browne, Director  
Los Alamos National Laboratory  
P.O. Box 1663, MS-A100  
Los Alamos, NM 87545

**RE: Review of the LANL Annual Status Summary Report-FY97 and Annual Meeting**

Dear Mr. Taylor and Dr. Browne:

This letter is in response to the Annual Meeting Regarding the Implementation of the Los Alamos National Laboratory's (LANL) Hydrogeologic Workplan (held March 30, 1998) and submittal of the LANL Annual Groundwater Status Summary Report-FY97 (referenced by LAAME:6BK-007) to the New Mexico Environment Department (NMED) RCRA Permits Management Program (RPMP).

As mentioned to Department of Energy (DOE) and LANL staff following the annual meeting and discussed in the Quarterly Hydrogeologic Workplan meeting held June 29, 1998, RPMP was disappointed with the level of detail provided in the Summary Report and Annual Meeting. RPMP does however recognize that this was the first submittal and meeting concerning the implementation of the Hydrogeologic Workplan and areas of needed improvement would undoubtedly surface. The following comments illustrate the type of detail RPMP/NMED would like to see in future Annual Meetings and Annual Report submittals.

- RPMP requests more detail be provided. For example, Section 3.2.2.1, Aggregate 2 FY97 Investigations (page 60), please include the identification for each well completed, a map illustrating the locations, media sampled, location of samples (e.g., sediment 5.5-6 feet below ground surface), analytical methods used, summary of analytical results, etc.
- RPMP requests more detail be provided on data that support the 3 month travel time between the 260 Outfall and SWSC Spring (page 75, Section 3.2.5.2, Aggregate 5 Conceptual Model Refinements). Provide a summary (break through curves?) of the tracer data. Overlay a precipitation curve for the same period (be sure to identify the period). Include a discussion of the data from Martin Spring and preliminary thoughts concerning contaminant pathways.
- Provide the locations of monitoring stations (page 73, Section 3.2.5.1, Aggregate 5 FY97 Investigations). Discern between new, old, and proposed monitoring stations.

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- Provide graphical representation of chloride, moisture profiles, etc..
- Some data/graphs were included in the presentations that were made but were not included in the report. Please include the data/graphs in future Annual Report submittals.
- Describe the Best Management Practices identified in the report. For example, Section 3.2.3.3 Aggregate 3 FY98 Planned Activities (page 69), states that a BMP will be implemented at TA-49 to prevent flow from the surface to subsurface but does not describe the BMP or provide a tentative schedule for the BMP activities. In addition, identify the core holes that will be "plugged".
- Provide a tentative schedule for when the FEHM model will be utilized for the "siting of future monitoring and characterization wells" (page 9, first paragraph). Discuss the FEHM model input parameters. Include a discussion of the confidence of the data to be input into the model (where available at this stage of development).
- Describe how the observed head data will be calibrated (page 10, #5).
- Include the tentative completion date, status and availability of funding for all the activities (proposed and in progress).
- Provide data summaries and/or tables (similar to the data summaries and presentation provided in the discussion of LA and Pueblo canyons: Section 3.2.1.1, pages 22-27 and Section 3.2.1.3, page 31-58).

RPMP recognizes that NMED staff need to engage in more discussion and provide more comments during these meetings; however, due to the restraints with the timing of the meeting and submittal of the Annual Report, NMED staff did not have the opportunity to thoroughly review the report.

The content of the Annual and Quarterly Meetings will undoubtedly improve with time and RPMP believes that they are beneficial and productive. Should you have any questions concerning this letter or other related issues please contact myself or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,



Robert S. (Stu) Dinwiddie, Ph. D., Manager  
RCRA Permits Management Program  
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RSD:jry

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