Offsite

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

ENTERED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 1, 2010

George J. Rael
Federal Project Director
Los Alamos Site Office
Department of Energy, NNSA
3747 West Jemez Road
Los Alamos, NM 87544

Michael Graham
Associate Director Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS 991
Los Alamos, NM 87545

RE: APPROVAL WITH MODIFICATIONS
WORK PLAN FOR ALTERNATIVE MONITORING
BUCKMAN WELL FIELD
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-MISC-GW

Dear Messrs Rael and Graham:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and the Los Alamos National Security (LANS), L.L.C.'s (collectively, the Permittees) document entitled *Work Plan for Alternative Monitoring at the Buckman Well Field* (Plan) dated July, 2010 and referenced by EP2010-0292.

NMED has reviewed the Permittees' Plan, and hereby issues this approval with the following modifications.

1. In order to detect groundwater contamination and adequately characterize the shallow and intermediate depth aquifers in the vicinity of the Buckman Well Field, the Permittees must install pumps in piezometers SF-5B and SF-5C and collect samples from the piezometers at the time of sampling of the other

33899

Buckman Well Field piezometers. Analytical results obtained from the sampling of these piezometers shall be integrated and evaluated in conjunction with data collected at piezometers SF-2B and A-series piezometers SF-3, SF-4, and SF-5.

2. The Permittees shall attempt to remove all foreign debris (metal tape, glass, etc.) from each piezometer where pumps are to be installed. An attempt also should be made to remove accumulated sediment and rocks from the piezometer sumps.

3. In order to install a pump at piezometer SF-5A as prescribed in the Plan, the rock obstruction located above the SF-5A screen will have to be removed. Therefore, the Permittees must attempt to dislodge and remove the rock so that the pump can be installed.

4. The Permittees must demonstrate that the proposed low-flow sampling technique will provide representative samples and high-quality data. If the low-flow sampling technique cannot provide representative samples, then the Permittees must re-evaluate the use of the piezometer nests as an alternative monitoring network for the Buckman Well Field. No later than the second round of sample collection, the Permittees must determine if the piezometer nests are capable of obtaining representative samples. The Permittees shall make this determination no later than **April 1, 2011** and include the supporting evidence for the usefulness of the piezometers with the submittal of an interim groundwater monitoring report summarizing the results of the first two rounds of monitoring and sampling. If it is determined that the piezometer nests do not provide representative samples, then the Permittees must submit a work plan by **June 30, 2011** to propose the installation of one or more monitoring wells designed to detect contamination and monitor groundwater in the vicinity of the Buckman Well Field.

Should you have any questions, please contact Michael Dale of my staff at (505) 661-2673.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:md

cc: J. Kieling, NMED HWB
T. Skibitski, NMED DOE OB
S. Yanicak, NMED DOE OB, MS M894
B. Olson, NMED GWQB
L. King, EPA 6PD-N
D. Katzman, ENG-TECH, MS M992
H. Shen, DOE LASO, MS A316
C. Borchert, City of Santa Fe
N. Dhawan, NMED HWB

File: '10 Reading and LANL Groundwater General, Alternative Monitoring Work Plan, Buckman Well Field