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Cabinet Secretary - Designate

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Acting Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

October 17, 2016

Mr. Robert S. Beers, LANS-EPC-CP  
Los Alamos National Security, LLC  
P.O. Box 1663 MS K490  
Los Alamos, NM 87545

**RE: Mechanical Integrity Testing, Los Alamos National Laboratory Underground Injection Control Wells, Discharge Permit 1835**

Dear Mr. Beers:

On August 4, 2016, the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) received a Chromium Piping and Infrastructure Project Workplan (workplan) from DOE/LANS (the Permittees) describing the design plans and specifications of distribution piping for the underground injection control (UIC) wells regulated by Discharge Permit DP-1835 (EPC-DO-16-219). Condition 3 of DP-1835 requires the workplan for mechanical integrity testing of the distribution piping and injection wells associated with the permit.

NMED understands that the procedures described in the workplan are scheduled to be completed in series as segments of piping are installed and UIC wells are completed, and that the Permittees will submit the results of the mechanical integrity testing for each segment within 60 days of each test completion and prior to bringing the segments online.

The workplan proposes to hydrostatically test each single wall pipe and interior “carrier” pipe of a double wall system with potable water to a maximum pressure of 225 pounds per square inch (psi) and observe pressures for a minimum of one hour. The test is considered a failure and discontinued if pressure drops more than 10% over the course of the test period. The double wall pipe “containment” pipe will be pneumatically tested to 10 psi and observed for a minimum of two hours. If containment pressure drops but carrier pressure remains zero psi, the containment pipe is determined to be leaking and marked for failure. If containment pipe pressure drops and



Bob Beers, DP-1835  
October 17, 2016  
Page 2 of 2

carrier pipe pressure increases, the carrier pipe is determined to be leaking and marked for failure. Failed systems will be evaluated for integrity, repaired, and retested.

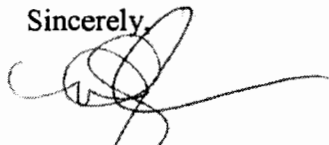
Hydrostatic testing water is to be dechlorinated and discharged to existing stormwater detention basins that have been constructed at each of the well pads where piping will be installed. The project is covered under the NPDES Construction General Permit and a Storm Water Pollution Prevention Plan under the NPDES General Permit.

The workplan is approved as submitted for mechanical integrity testing of individual segments of pipe infrastructure as required for DP-1835. NMED requests that a workplan and schedule for mechanical integrity testing of the UIC wells proposed under DP-1835 be submitted for NMED approval as that becomes available.

Approval of this workplan does not relieve the Permittees of the responsibility to comply with any other applicable federal, state, and/or local laws and regulations. This approval also does not relieve the Permittees of liability should operations associated with this workplan result in actual pollution of ground or surface waters.

If you have any questions, please contact Greg Huey at (505) 827-6891. Thank you for your cooperation.

Sincerely,



Michelle Hunter, Chief  
Ground Water Quality Bureau

MH:gmh

cc (e-version):

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