

TA-03



State of New Mexico
ENVIRONMENT DEPARTMENT

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MEMORANDUM

To: Gedi Cibas, Office of the Secretary
From: Marcy Leavitt, Chief, GWQB
Date: January 10, 2003
Re: Proposed LANL Permeable Reactive Barrier, NMED File # 1676ER

The Ground Water Quality Bureau (GWQB) has reviewed Los Alamos National Laboratory (LANL) report LA-UR-02-7508 which proposes to install a permeable reactive barrier to remediate alluvial ground-water pollution in Mortandad Canyon. In this pilot project, LANL proposes to install layers of lava rock, gravel, mineral apatite, cotton seed meal, pecan shells, and limestone in order to reduce concentrations of nitrate, perchlorate, and radionuclides in ground water.

The GWQB supports the concept of this pilot project as it may abate ground-water pollution. Pursuant to N.M. Water Quality Control Commission (WQCC) regulation 20.6.2.4105.A.3, NMAC, the proposed action is exempt from the WQCC Abatement Plan requirements because abatement of ground-water pollution at LANL should be accomplished in accordance with the November 26, 2002 Order issued to LANL by NMED under the N.M. Hazardous Waste Act. If, however, such abatement does not ultimately result in compliance with WQCC standards, the exemption would no longer be applicable, and LANL may be required to submit an Abatement Plan proposal to achieve compliance.

Since the project will involve the introduction of foreign materials into ground water, LANL must file a Notice of Intent to Discharge with NMED pursuant to WQCC regulations 20.6.2.3104 and 20.6.2.3106, NMAC.

Xc: Maura Hanning, GWQB Pollution Prevention Section
Christine Bynum, GWQB Remediation Oversight Section
James Bearzi, Hazardous Waste Bureau
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