



DENISE D. FORT  
DIRECTOR

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 24, 1986

Harold E. Valencia  
Area Manager, Los Alamos Area Office  
Albuquerque Operations  
Department of Energy  
Los Alamos, New Mexico 87544

Dear Mr. Valencia:

This is in response to your letter of November 7, 1986 regarding injection wells at Los Alamos National Laboratory (LANL). Your letter presents several legal and policy questions along with some of the technical information requested by my letter of November 3, 1986 to Harold Valencia.

The Environmental Improvement Division (EID) reserves the right to respond to your legal and policy questions as well as to pursue enforcement action at a later date. This letter is directed to technical issues on the injection wells cited in your letter of November 7, 1986.

- 1) The 60-foot deep dry well in TA-16 which replaced outfall 058 and the two 40-foot deep dry wells in TA-22 which replaced outfalls 008 and 077 were described as being abandoned. EID requires detailed information on the quantity and chemical analyses on the waste stream injected into these dry wells. In addition, EID needs specifications on methods and materials used for plugging and abandonment.
- 2) A June 5, 1981 letter which was enclosed with your November 7, 1986 letter indicated the presence of vertical shafts which could be used for subsurface injection in Areas C, D, G, H, T and L. The letter states that Areas D, G, H and T were used for subsurface detonation of explosives or subsurface emplacement of solid wastes. Accordingly, Areas D, G, H and T do not come under the underground injection control program.

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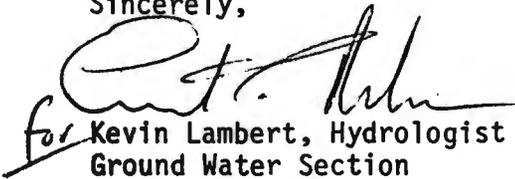
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- 3) Based on the information you provided, the vertical shafts in Areas C and L are not exempt from the New Mexico Water Quality Control Commission (WQCC) regulations. Please define the current status of the vertical shafts. If they are in active use for disposal, please submit a completed notice of intent. If inactive, EID requires detailed information on the quantity and chemical analyses on the waste stream injection into the vertical shafts. Furthermore, the vertical shafts must be plugged and abandoned. Therefore, LANL should submit to the Ground Water Section of EID detailed specifications on methods and materials for plugging and abandonment. EID must be provided the opportunity to review and evaluate such specifications for conformance with the WQCC regulations in advance of actual plugging and abandonment.
- 4) The EID would like a statement from you that the only wells (defined as any hole in the ground with a depth greater than its diameter) used for past and present injection of fluids at LANL are those listed in this letter, specifically:
  - a) Dry well in TA-16,
  - b) Two dry wells in TA-22,
  - c) Vertical shafts in Area C and
  - d) Vertical shafts in Area L.

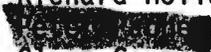
If there are additional injection wells, used in the past or presently, please notify us accordingly.

It is in our mutual interests to resolve all concerns related to injection wells in an expeditious manner. We ask that you provide the information requested herein within 15 working days of receipt of this letter.

Sincerely,

  
for Kevin Lambert, Hydrologist  
Ground Water Section

KL/mp

cc: Pat Anderson  
Tito Madrid  
Richard Holland  
  
Glenn Saums  
Richard Mitzelfelt