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PETER MAGGIORE
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 25, 1999

Mr. Theodore Taylor, Project Manager
Los Alamos Area Office-Department of Energy
528 35th Street
Los Alamos, NM 87544

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

RE: **Response to the Proposed Land Application of Stored Ground Water Produced During the Drilling of Monitoring Well R-25, Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Taylor and Dr. Browne:

The Hazardous and Radioactive Materials Bureau's (HRMB) RCRA Permits Management Program (RPMP) has reviewed the letter and data provided with the request to land apply stored ground water produced from drilling activities at R-25, dated January 29, 1999 (referenced by ESH-18/WQ&H:99-0005). After review of the data, RPMP approves land application of the stored ground water related to groundwater/hydrogeological characterization activities at regional well R-25. RPMP does require that prior to land application, Los Alamos National Laboratory (LANL) submit a plan for this activity. The plan should include, but is not limited to the following items:

1. maps of the area and any alternate areas to be used for the land application,
2. a schedule outlining the projected duration of the land application, rotation schedule (if any) of application devices (i.e., sprinklers), rates of application, etc.,
3. a schedule of inspections to determine excessive ponding and/or erosion, the need for or condition of any best management practices, the condition of piping (leaking or broken), etc.,
4. definitions of ponding and erosion to maintain consistency between inspection staff, and
5. conduct the LANL Erosion Potential - Standard Operating Procedure (SOP) 2.01 (former AP 4.5).



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HSWA LANL 3/1082/14 CR-25

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RPMP requests that LANL determine an appropriate number of soil samples to be collected from the land application area prior to *and* post application (both immediately after application and six (6) to twelve (12) months later). This should enable LANL and RPMP to characterize any natural attenuation of the HE residue that may occur post application. In addition, it would aid in any future decisions concerning land application of high explosive contaminated ground water produced during drilling of wells associated with the LANL Hydrogeologic Workplan (dated May 22, 1998). This approval for application is limited to the water in the tanks labeled, FT 200, FT213, Poly #1, Poly #2, Poly #3, Poly #4, Poly #5, Poly #6 and Poly #8. High explosives and metals analyses of all other tanks storing water produced by drilling activities at R-25 must be acquired and submitted to HRMB-RPMP prior to land application.

If you have any questions please do not hesitate to call me at 827-1561 extension 1039 or, John Kieling, RPMP's LANL Facility Manager, at 827-1558 extension 1012.

Sincerely,



Robert S. (Stu) Dinwiddie, Ph. D.
RCRA Permits Management Program Manager
Hazardous and Radioactive Materials Bureau

RSD:jry

cc:

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