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DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



NOV 18 2004

CERTIFIED MAIL/RETURN RECEIPT

Mr. John Young, Corrective Action Project Leader
Permits Management Program
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505-6303

Ms. Cindy Padilla
Bureau Chief
NMED-Solid Waste Bureau
P.O. Box 26110
Santa Fe, NM 87502

Subject: Management of Drill Cuttings from Wells and Boreholes Constructed Under
Canyons Workplans

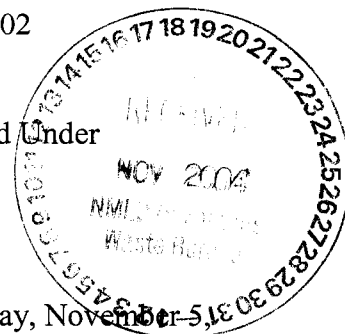
Dear Mr. Young and Ms. Padilla:

The topic of drill cuttings was discussed on a site visit by NMED staff on Friday, November 5, 2004. The purpose of this letter is to document a standard practice for management of drill cuttings of regional and intermediate wells at the Los Alamos National Laboratory (LANL) as well as boreholes drilled under Canyons Work Plans. Currently, numerous wells and boreholes are being drilled at LANL under the Mortandad Canyon Groundwater Work Plan, which did not contain a description of drill cuttings management. This letter provides NMED with documentation for these wells and boreholes as well as any other wells and boreholes drilled in the near future for canyons investigation purposes.

The drill cuttings management practice outlined below is consistent with past practice and past documentation (see enclosed letter dated January 22, 2003) and is also consistent with negotiations to date on this subject associated with the draft Consent Order (Order) for Hazardous Waste Bureau regulated activities. We understand that in the future the NMED will require documentation of such practices in work plans submitted under the Order.

The standard drill cuttings management practice is as follows:

- Before restoration of a drilling site, drill cuttings will be analyzed for hazardous waste constituents to include organics (EPA 8260-B and 8270-C), total inorganics (EPA 6010-B), and where appropriate, high explosives (EPA 8330) and PCBs (EPA 8082). TCLP analysis may be performed based on knowledge of the area being investigated. Review of the analytical data will consist of comparing the drill cuttings analytical data to the human health soil screening levels (SSL) from the New Mexico Environment Department (NMED) Soil Screening Levels, Revision 2 (February 2004). If available, analytical results from core samples may be used in lieu of sampling drill cuttings. Results will be included in reports to NMED as required and analytical data packages will be retained by the DOE and made available upon request.



NOV 18 2004

- 2 -

- If analytical results demonstrate that the cuttings do not contain hazardous waste constituent concentrations exceeding soil screening levels, then the cuttings will be used during site restoration. Specifically, the drill pit liner will be removed and the cuttings will be retained in place within the drill pit. The cuttings may also be spread and recontoured on the drill site or roads in a manner that does not change existing drainage patterns or surface runoff patterns.
- If analytical results demonstrate that the cuttings contain constituent concentrations exceeding soil screening levels, then these results shall be provided to the NMED in writing along with a proposed disposal plan consistent with applicable requirements.
- DOE will also assess cuttings for radionuclide concentrations to determine appropriate disposition of cuttings relative to radionuclides. When available, radionuclide analysis results will be provided to NMED under the voluntary agreement for sharing radionuclide data.

This letter is intended to provide sufficient documentation of a standard practice for drill cuttings management for canyons wells and boreholes. We are currently implementing this practice based on previous correspondence and discussions with NMED. If further documentation, or any change to the standard practice is needed, please contact Tom Whitacre at (505) 665-5042, or Danny Katzman at (505) 667-6333.

Sincerely,



Mathew P. Johansen
Groundwater Program
Compliance Manager

EM:3MJ-003

Enclosure:

January 2003 letter titled Management of Drill Cuttings from Hydrogeologic Workplan Wells (R-wells) from Mr. Charles Nylander and Mr. Mat Johansen to Mr. John Young and Mr. Butch Tongate.

cc w/ enclosure:

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