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36

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JAMES C. KENNEY
Cabinet Secretary Designate

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 5, 2019

Doug Hintze, Manager
Environmental Management
Los Alamos Field Office
P.O. Box 1663 MS-M984
Los Alamos, NM 87545

**RE: APPROVAL WITH MODIFICATIONS
WORK PLAN TO RECONFIGURE MONITORING WELLS
R-19 AND R-31
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-18-061**

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) *Work plan to Reconfigure Monitoring Wells R-19 and R-31* (Work Plan), dated November 2018 and referenced by EM2018-0083. The Work Plan was received on November 19, 2018.

Pursuant to Section XXIII of the 2016 Compliance Order on Consent, a pre-submission review meeting was held with NMED and DOE on October 12, 2018 to discuss the content of the Work Plan submittal. After conducting a technical review of the Work Plan, NMED sent draft review comments on the Work Plan to DOE by electronic mail on November 30, 2018. A post-submittal meeting was held on December 17, 2018 to informally resolve NMED's comments. During the post-submittal meeting, DOE agreed to incorporate NMED's comments as modifications to the Work Plan. NMED hereby issues this approval for the Work Plan with the following modifications.

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MODIFICATIONS

1. 3.6 Hydraulic Step Tests – Postjetting

NMED Comment: The postjetting hydraulic step tests should be conducted such that hydraulic properties data (including transmissivities and storage coefficients) can be collected at R-19 screen 3 and R-31 screen 2. These data may be very useful to site-wide and site-specific groundwater flow and contaminant transport models that may be implemented as part of future corrective actions for the RDX groundwater plume.

2. 3.8 Final Sampling System Installation

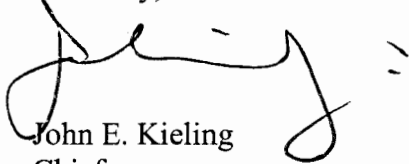
NMED Comment: The decision to install a Bennett pump at R-19 screen 2 should be based on whether the saturated zone yields sufficient groundwater and post-conversion analytical data. Initial characterization and subsequent monitoring data from this saturated zone will benefit the RDX 260 Outfall 16-021(c)-99 deep groundwater investigation and subsequent corrective actions (e.g., cleanup and/or monitoring strategies, numerical modeling) and may pose as a good monitoring point for other upgradient contamination sources (e.g., TAs 8, 9, 15, 18, 22, 67, etc.). The R-19 screen 2 monitoring point also has potential relevance to the site-wide groundwater monitoring program or Interim Facility-Wide Groundwater Monitoring Plan.

3. 4.0 Schedule

NMED Comment: The Westbay wells reconfiguration report, due August 30, 2019, should include a comparison of pre-reconfiguration Westbay well data and the new post-conversion data from all applicable screens, including data collected at wells R-5, R-7, R-8, and R-9i.

If you have any questions or comments regarding this correspondence, please contact Dane Andersen at 505-476-6056.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
D. Andersen, NMED HWB
M. Dale, NMED HWB

Mr. Hintze
February 5, 2019
Page 3

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File: Reading and LANL 2019, TA-00, R-19 and R-31 Reconfiguration Work Plan Approval
with Mods