

Roberts, Kathryn, NMENV

ENTERED

From: Roberts, Kathryn, NMENV
Sent: Tuesday, May 13, 2008 8:27 AM
To: 'Ann Sherrard'
Cc: Cobrain, Dave, NMENV
Subject: RE: land applying drill cuttings at MDA C

Ann,

NMED concurs with the use of drill cuttings which meet the residential SSLs/SALs as well as the LDRs, for use as overburden, road construction material, etc. However, the Permittees cannot use the drill cuttings to backfill boreholes. It is NMED's position that the boreholes become preferential pathways for contaminant migration if not properly plugged and abandoned. Additionally, NMED does not have any record of the NOI Decision Tree being approved by our office on November 16, 2007. Furthermore, application of the NOI Decision Tree was meant for groundwater, not soil borings associated with investigation activities at MDAs.

If you have any questions please feel free to contact me.

Thanks,
Katie

-----Original Message-----

From: Ann Sherrard [mailto:sherrard@lanl.gov]
Sent: Monday, May 12, 2008 9:11 AM
To: Roberts, Kathryn, NMENV
Subject: land applying drill cuttings at MDA C

Katie

Thanks so much for taking the time to discuss the land application of drill cuttings at MDA C. As we discussed, the Phase II Work Plan (April 2007) was written prior to approval of the NOI Decision Tree for drill cuttings (approved by NMED on November 16, 2007). As we discussed, LANL would like to land apply the drill cuttings as long as contamination levels meet the residential SSLs and Land Disposal Restriction (LDR) standards, in accordance with the NOI Decision Tree.

Thank you
Ann Sherrard

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