



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION
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DENISE FORT, DIRECTOR

MEMORANDUM

TO: Ron Conrad, Water Resource Specialist, Technical & Enforcement Section
FROM: Peter H. Pache, Program Manager, Hazardous Waste Section
DATE: 22 August 1984
RE: Los Alamos National Laboratories (LANL) Ground Water Monitoring Waiver Documentation

We are requesting that your section review LANL's documentation supporting a waiver of ground-water monitoring requirements at their hazardous waste disposal area and provide comments to this section regarding the adequacy of that documentation. So that we may proceed with timely enforcement at LANL, please provide your comments within the next six weeks. In addition to your comments, we would appreciate you filling in the attached checklist.

The standard for review is found in Section 206.C.1.a.(3). of the New Mexico Hazardous Waste Management Regulations (HWMR-2). There are two primary questions:

- 1) Does the submitted documentation meet these requirements? (Greg Mello's initial evaluation indicates it does not.)
- 2) Could a more sophisticated submittal meet these requirements? If so, what data/modeling would LANL need to submit?

LANL is a very complex case, involving multiple hazardous waste areas, large amounts of waste, a jurisdictional struggle, technical questions, and national security issues. We believe the documentation needs review by several people. Greg Mello is knowledgeable about operations at LANL and is available to assist in the review. Ann Claassen is available to answer questions about the ground water monitoring regulations of HWMR-2. Attached are several documents pertaining to conditions at LANL.

The references Mr. Purtyman cites can probably be requested directly from him. (Sandia, in a related submittal, copied all references cited and enclosed them in separate binders.) Feel free to contact Purtyman; if you are going to need to talk to other LANL folks, please check with us.

xc: Anthony Drypolcher
Ann Claassen
Greg Mello



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