

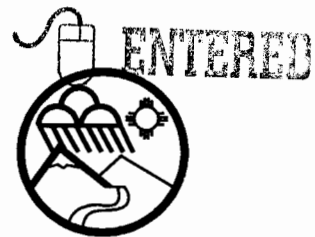


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PETER MAGGIORE
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 28, 2001

Dr. Inés Triay, Manager
Carlsbad Field Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221-3090

Mr. John Lee, General Manager
Westinghouse TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: NMED COMMENTS ON WIPP GROUNDWATER MONITORING REPORT FOR
JUNE – DECEMBER 2000
WIPP HAZARDOUS WASTE FACILITY PERMIT
EPA I.D. NUMBER NM4890139088**

Dear Dr. Triay and Mr. Lee:

On March 23, 2001, the New Mexico Environment Department's (NMED) Hazardous Waste Bureau (HWB) received "WIPP Groundwater Detection Monitoring Program Semiannual Groundwater Monitoring Report", Round 11, September to November, 2000. The Department of Energy Carlsbad Field Office and Westinghouse TRU Solutions LLC (the Permittees) submitted this report in compliance with Permit Condition V.J.2.a.

On June 29, 2001, the NMED provided comments and requested additional information from the Permittees concerning the report. The Permittees complied in a supplemental report dated August 30, 2001. This supplemental report generally satisfies the NMED's concerns with the following exceptions, which must be adequately addressed prior to the NMED's acceptance of the report:

- **Comment #5, 1st Bullet, regarding laboratory reports:**

The Permittees provided a comprehensive QA/QC review checklist for each well sampled; however, this checklist is a "yes/no" survey that does not go into any

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detailed explanation. There were several “no” inputs or apparent deficiencies by the lab that were not addressed by the Permittees, therefore, the significance or impacts to the validity of the relevant analytical results are unknown. It was noted that all seven (7) wells had some type of QA/QC deficiency per the checklist.

It was also noted that the Permittees created a QA/QC review text for each well for Round #11 that was not included, nor was it mentioned, in the Semi-Annual Monitoring Report or the August 30, 2001, response. The QA/QC review text was found in a CD-ROM that the Permittees submitted to NMED in June 2001, in response to a NMED request for electronic data for DMP activities.

- **Comment #8, sample holding times**

The Permittees' Attachment 2, the QA/QC review checklist, indicated that holding times were not exceeded. However, with the exception of WQSP-1, NMED noted that the holding time for TOX (7 days) was exceeded for other wells, ranging from four (4) to twenty (20) days. All other holding times for VOCs, SVOCs and metals do not appear to have been exceeded. Please explain the consequences of exceeding the holding time for this parameter.

- **Comment #10, T_n outlier values**

A T_n outlier value was only relevant to the potassium results for well WQSP-1. The response dated August 30, 2001, briefly explains the outlier calculation process and assigns a critical value of 2.532 for potassium based on 19 observations. Were these 19 observations from the previous 10 sampling rounds and their respective duplicates with one (1) duplicate result being thrown out?

A value of 2.40 for T_n was presented in the response. NMED was unable to duplicate this calculation. A value of 2.83 mg/L was obtained by the NMED using the Permittees' values. This value exceeds the critical value provided in the response. Please furnish the calculations supporting your value of 2.40 mg/L.

- **Comment #11, Bullets #2 and #3, regarding Table 3 values**

NMED's copy of the semiannual report does not contain the laboratory report with the re-analysis values stated by the Permittees (TDS for WQSP-1). Please furnish this report.

The third (3rd) question was not addressed in the response letter.

NMED requests a formal written response to the comments/requests for information listed above. Please submit your response within thirty (30) calendar days from the date

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you receive this letter. NMED may consider a petition for a deadline extension, provided that a written justification and the expected submittal date are given.

If you have any questions regarding this matter, please contact Will Fetner at (505) 428-2520.

Sincerely,



Steve Zappe
WIPP Project Leader
Permits Management Program

cc: James Bearzi, Chief, HWB
John Kieling, Manager, Permits Management Program, HWB
Susan McMichael, NMED OGC
Will Fetner, HWB
Phillis Stevens, HWB
David Neleigh, EPA Region 6
Connie Walker, TechLaw, Inc.
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