



Department of Energy
 Carlsbad Field Office
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DEC 05 2011



Mr. John Kieling, Acting Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505-6303

Subject: Additional Comments on the September 29, 2011, Class II Permit Modification Request: "Update Ventilation Language, Addition of a Shielded Container, and Revise the WIPP Groundwater Detection Monitoring Program plan"

Dear Mr. Kieling:

The purpose of this letter is to provide you with additional comments on the subject permit modification request.

We certify under penalty of law that this document and the enclosure were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Ms. Susan McCauslin at (575) 234-7349.

Sincerely,


 Edward Ziemianski, Interim Manager
 Carlsbad Field Office


 M. F. Sharif, General Manager
 Washington TRU Solutions LLC

Enclosures (2)

cc: w/enclosure
 T. Hall, NMED *ED
 T. Kliphuis, NMED ED
 CBFO M&RC
 *ED denotes electronic distribution

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Enclosure 1

Additional Comments on the September 29, 2011, Class 2 Permit
Modification Request: "Update Ventilation Language, Addition of a Shielded
Container, and Revise the WIPP Groundwater Detection Monitoring Program
Plan"

Permittees' Additional Comments on the September 29, 2011, Class 2 Permit Modification Request: "Update Ventilation Language, Addition of a Shielded Container, And Revise the WIPP Groundwater Detection Monitoring Program Plan"

1. Editorial correction, PMR Item 3, *Revise the WIPP Groundwater Detection Monitoring Program Plan*, Table L-5, *Details of Construction for the Six Culebra Detection Monitoring Wells*, to provide consistency in unit conversions and rounding and to correct one value for WQSP-6 drilling depth with error. The attached Table L-5 was created to assure consistency in the manner in which the values are represented. The process is as follows: Retrieve the value from the associated Figure and convert to metric using an online converter, rounding to the nearest whole meter. This resulted in minor adjustments in the values (shown in yellow). One error was corrected in the process regarding drilling depths "With Air" for well WQSP-6. This was corrected to agree with the drilling depth value in the adjacent "Coring" column.
2. Editorial correction, PMR Item 3, *Revise the WIPP Groundwater Detection Monitoring Program Plan*, Page B-31, Line 34. Insert, "or three well bore volumes, whichever occurs first," after "...parameters stabilize...." Either stabilization of field parameters or collection of three well bore volumes attains the sample quality required for laboratory analysis. This change makes this language consistent with the proposed text in Section L-4c(2)(ii).

~~Ground-water~~Groundwater surface elevations will be measured in each well~~DMW~~ prior to ~~ground-water~~groundwater sample collection. ~~Ground water~~Groundwater will be extracted using serial and final sampling methods. Serial samples will be collected until ~~ground-water~~groundwater field indicator parameters stabilize or three well bore volumes, whichever occurs first, after which the final sample for complete analysis will be collected. Final samples will then be analyzed for the ~~DMP analytical suite~~ parameters and constituents in Part 5, Tables 5.4.a and 5.4.b

3. Editorial correction. Item 3, *Revise the WIPP Groundwater Detection Monitoring Program Plan*, Page B-53, Lines 14 and 17. In line 14 move the "and" to be in front of "temperature" and delete the comma immediately after temperature. In Line 17 delete the text "and SC to 10 millivolts (mV)". The correct SC units are included earlier in the sentence and not needed here.

~~Precision of field measurements of water quality parameters will meet or exceed required reporting levels. Specific conductance SC, pH, and temperature, and optionally Eh will be measured during well purging and after sampling. SC measurements will be precise to ±10%, pH to 0.10 standard unit, specific gravity to 0.01 by hydrometer, and and temperature to 0.10 degrees Celsius (°C), and SCEh to 10 millivolts (mV). Water-level measurement will be precise to ±0.01 ft. The precision of water density measurements, when measured in the field using down hole instrumentation, will be determined on a well-by-well basis and will result in no more than ±2 ft of error in the derived fresh-water head.~~

Enclosure 2

Table L-5
Details of Construction for the Six Culebra Detection Monitoring Wells

Table L-5
Details of Construction for the Six Culebra Detection Monitoring Wells

NAME (Figure)	DATE DRILLED	TOTAL DEPTH feet (meters) bgs	DEPTH INTO LOS MEDAÑOS feet (meters)	DRILLING DEPTHS feet (meters) bgs		CASING feet (meters) bgs		PACKING feet (meters) bgs			CULEBRA INTERVAL feet (meters) bgs
				WITH AIR	CORING	DEPTH FOR 5 in. CASING	INTERVAL FOR SLOTTED SCREEN	SAND PACK INTERVAL	BRADY GRAVEL PACK INTERVAL		
WQSP-1 Figure L-7	September 13 through 16, 1994	737 (225)	15 (5)	696 (212)	696 to 737 (212 to 225)	737 (225)	702 to 727 (214 to 222)	640 to 651 (195 to 198)	651 to 737 (198 to 225)	699 to 722 (213 to 220)	
WQSP-2 Figure L-8	September 6 through 12, 1994	846 (258)	12 (4)	800 (244)	800 to 846 (244 to 258)	846 (258)	811 to 836 (247 to 255)	790 to 793 (241 to 242)	793 to 846 (242 to 258)	810 to 834 (247 to 254)	
WQSP-3 Figure L-9	October 20 through 26, 1994	880 (268)	10 (3)	833 (254)	833 to 880 (254 to 268)	880 (268)	844 to 869 (257 to 265)	827 to 830 (252 to 253)	830 to 880 (253 to 268)	844 to 870 (257 to 265)	
WQSP-4 Figure L-10	October 5 through 10, 1994	800 (244)	9 (3)	740 (226)	740 to 798 (226 to 243)	800 (244)	764 to 789 (233 to 240)	752 to 755 (229 to 230)	755 to 800 (230 to 244)	766 to 791 (233 to 241)	
WQSP-5 Figure L-11	October 12 through 18, 1994	681 (208)	7 (2)	648 (198)	648 to 676 (198 to 206)	681 (208)	646 to 671 (197 to 205)	623 to 626 (190 to 191)	626 to 681 (191 to 208)	648 to 674 (198 to 205)	
WQSP-6 Figure L-12	September 26 through October 3, 1994	617 (188)	10 (3)	568 (173)	568 to 617 (173 to 188)	617 (188)	581 to 606 (177 to 185)	567 to 570 (173 to 174)	570 to 617 (174 to 188)	582 to 607 (177 to 185)	