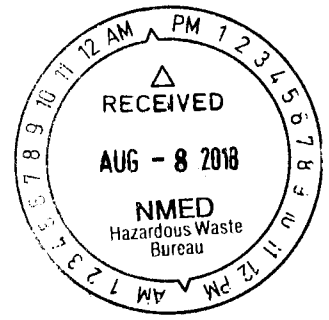




Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221



AUG 06 2018

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Dr. Bldg. 1
Santa Fe, New Mexico 87505-6303

Subject: Notification of Toluene Detected in WIPP Detection Monitoring Well WQSP-5 and Intent to Demonstrate Outside Contamination, Permit Number NM4890139088-TSDF

Dear Mr. Kieling:

The purpose of this letter is to notify you that a very low concentration of toluene was detected in Detection Monitoring Well (DMW) WQSP-5. Toluene was detected at a concentration above the respective background value of 1.00 ug/L in Permit Part 5, Table 5.6 in DMW WQSP-5. This DMW was sampled on May 31, 2018, as part of the annual Detection Monitoring Program (DMP) sampling plan. The data package was received July 30, 2018. The concentration of toluene detected in the primary sample was 2.07 micrograms per liter ($\mu\text{g/L}$) and 2 $\mu\text{g/L}$ in the duplicate sample. Because toluene concentrations are typically below the method detection limits for this well, the reported value is considered statistically significant.

A preliminary assessment indicates the source of toluene in the WQSP-5 sample is not the regulated unit, but due to replacement of the well pump on May 21, 2018, prior to sampling. Because the concentrations are so low, the likely source of toluene is from the lack of proper use of personnel protective equipment and tools by the pump removal and installation contractor. The contractor indicated the gloves used were dirty and could have been soiled by a number of different sources, including gasoline or volatiles prior to installation of the new pump. The Permittees intend to demonstrate that an outside source is responsible for this contamination, therefore, this notification is being made pursuant to Permit Part 5, Section 5.10.4.1.

In order to demonstrate that the contamination was due to an outside source and not the regulated unit the following actions are planned pursuant to Permit Part 5, Section 5.10.4.2. Immediate actions planned are to pump at least three well bore volumes of water from the well, re-sample the well, and analyze for the toluene. The data will be evaluated and a final report of the contamination source will be generated within 90 calendar days of NMED's receipt of this notification. During this evaluation period, the Permittees will continue to implement the DMP as required by Permit Part 5, Section 5.10.4.4. In addition, we will also provide a written reminder to the installation contractor regarding removing the potential for cross contamination and continued adherence to pump removal and installation well protocols for the WIPP DMP. Lastly, we plan to provide WIPP site personal to observe the next pump removal and installation process



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Mr. Kieling

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to verify removal and installation protocols and provide defense in depth to preclude recurrence.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to 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 fines and imprisonment for knowing violations.

If you have any questions regarding this notification, please contact Mr. Anthony R. Stone at (575) 234-7475.

Sincerely,



Todd Shrader, Manager
Carlsbad Field Office



Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

cc:

R. Maestas, NMED *ED
D. Biswell, NMED ED
M. McLean, NMED ED
H. Tellez, NMED ED

CBFO M&RC

*ED denotes electronic distribution