



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



ENTERED



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 1997

Mr. George Dials, Manager
Carlsbad Area Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221

Mr. Joe Epstein, General Manager
Westinghouse Electric Corporation
P.O. Box 2078
Carlsbad, New Mexico 88220

Dear Messrs. Dials and Epstein:

RE: Request for revised WIPP Groundwater Monitoring Plan
EPA I.D. Number NM4890139088

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) is currently developing a draft permit based upon the RCRA Part B Permit Application (DOE/WIPP 91-005, Revision 6) submitted by the Department of Energy (DOE) and Westinghouse (WID) for the Waste Isolation Pilot Plant (WIPP) on April 12, 1996, with subsequent updates submitted May 29, 1996 and editorial page changes submitted June 3, 1996. The permit will address the management of transuranic mixed waste in portions of the Waste Handling Building and the adjacent parking lot, and the ultimate disposal of this waste into an underground miscellaneous unit.

During development of the permit module pertaining to groundwater detection monitoring, HRMB staff identified several inadequacies with the groundwater monitoring plan contained in the permit application (Appendix D18). During a telephone conversation on February 12 with Craig Snider and Bob Kehrman of your staffs, they informed HRMB of their determination that the groundwater monitoring plan was also insufficient for the purpose of preparing for the WIPP Operational Readiness Review (ORR), and that WID is currently revising the plan. Mr. Kehrman stated that the revision is primarily a consolidation of existing information scattered throughout the permit application, but that some new information may be added.

Based upon HRMB's need for an adequate groundwater monitoring plan and WID's revision of the existing plan, HRMB requests this revised groundwater monitoring plan for inclusion in both the administrative record and the draft permit. As was stated in the July 27, 1996 completeness determination, "This determination does not preclude HRMB from requesting additional information during the development of the draft permit, but only as necessary to clarify, modify or supplement previously submitted material. Requests for additional information will not render the application incomplete." This information is necessary to

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clarify, supplement, and possibly modify the material previously submitted as Appendix D18 in the above mentioned RCRA Part B Permit Application.

HRMB requests that the following topics be included and adequately addressed in the revised groundwater monitoring plan:

- Specify explicitly the proposed monitoring network.
- Identify the point of compliance for groundwater monitoring.
- Provide a complete discussion on the appropriateness of monitoring well locations and suitability of monitored intervals to detect releases of hazardous constituents. In particular, address what appears to be a potential detection well gap between WQSP-3 and WQSP-4 to the east of the repository.
- Provide geologic/hydrologic information (or reference other sections of the Part B Permit Application) to support the discussion on well locations and monitoring intervals.
- Provide well construction documentation, including installation methodologies, construction techniques, well development, detailed well diagrams, core logs, soil sampling, and justification for any deviations from typical well construction standards, as defined by the *RCRA Groundwater Monitoring Technical Enforcement Guidance Document (TEGD)* and *RCRA Groundwater Monitoring: Draft Technical Guidance*.
- Identify the proposed monitoring frequency for detection monitoring.
- Include detailed sampling procedures, types of containers used for sample collection, sample collection methodologies, sample preservation requirements, volumes required for analyses, chain of custody programs, etc.
- Describe equipment decontamination, management of investigation-derived waste, and surveying procedures.
- Include discussions of quality assurance/quality control for sample collection, such as frequency of duplicate, trip blank, and other sample collections.
- Provide a complete proposed list of indicator parameters, waste constituents, and reaction products for monitoring, the rationale for their selection, and the analytical methods to be used.
- Identify the contract laboratory performing sample analyses and include all associated SOPs.
- Include applicable and necessary quality assurance information within the plan, rather than reference governing documents.
- Provide procedures to statistically evaluate data.
- Include procedures and frequencies for collecting water level measurements.
- Provide a table summarizing groundwater quality data obtained to date (optional).

Please provide us with three hardcopies and an electronic copy (in WordPerfect 5.2 format) as soon as possible. You may coordinate shipment of the hardcopies to our office and that of our technical contractor with Mr. Steve Zappe of my staff.

Messrs. Dials and Epstein
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Thank you for your cooperation in this permitting process. If you have any questions, please contact Mr. Zappe at (505) 827-1561.

Sincerely,



Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc: Ed Kelley, NMED
Stu Dinwiddie, HRMB
Steve Zappe, HRMB
Susan McMichael, NMED OGC
David Neleigh, EPA Region 6
Frank Marcinowski, EPA ORIA
Connie Walker, A.T. Kearney
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