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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 11, 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 additional information on WIPP Solid Waste Management Units (SWMUs)

This letter is a follow-up to a fax sent by Steve Zappe of my staff to Linda Frank-Supka on March 20, 1997, requesting additional information on several Areas of Concern (AOCs). By this letter, HRMB formally requests the information contained in Attachment 1 to minimize the need to modify the HSWA portions of the draft permit after it is issued for public comment.

If you have any questions concerning this request for additional information related to these SWMUs, please contact Mr. Steve Zappe at (505) 827-1561.

Sincerely,

Robert S. (Stu) Dinwiddie, Manager
RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau

Attachment

cc: Ed Kelley, NMED
Benito Garcia, HRMB
Steve Zappe, HRMB
Susan McMichael, NMED OGC
Linda Frank-Supka, WID
Craig Snider, DOE
David Neleigh, EPA Region 6
Frank Marcinowski, EPA ORIA
WIPP File - Red '97



Attachment 1
Request for Additional Information

1. The Mud Pit SWMUs listed below require additional documentation to support DOE/WID's request for No Further Action (NFA). The information provided in the "Final Solid Waste Management Unit Assessment Report" (1/10/97) and "Data Summary Report No. 4" (5/29/96) supplied to HRMB failed to adequately document assertions that these mud pits contain no hazardous constituents. Instead of simply summarizing a review of the drilling records, please provide HRMB with records of sufficient detail to allow an independent determination on the presence or absence of hazardous constituents at each location. Also, consider and provide information on all wells drilled at a particular location. For example, even though the WIPP RCRA Facility Assessment (RFA) precludes hazardous constituents at the H-b1 well located at SWMU 001b, the remaining three wells (H-2a, H-2b2, and H-2c) were not mentioned in the RFA and thus hazardous constituents have not been precluded.

<u>SWMU #</u>	<u>SWMU Name</u>
001b	(H-2)
001c	(H-3)
001d	(H-5/P-21)
001e	(H-6/P-13)
001r	(D-123)
001u	(IMC-376)
001v	(IMC-456)
001w	(IMC-457)
001y	(WIPP-18)
001z	(WIPP-19)
001aa	(WIPP-21)
001ab	(WIPP-22)
001ac	(DSP-207)
001ad	(IMC-375)
001ae	(IMC-377)
001af	(H-16)
001ah	(H-19)
001ai	(WQSP-1)
001aj	(WQSP-2)
001ak	(WQSP-3)
001al	(WQSP-4)
001am	(WQSP-5)
001an	(WQSP-6/6a)

2. For the Evaporation Pond SWMU 007b, the RFA states that barium was detected above background levels, but below RCRA action levels. Thus, hazardous constituents have been identified, but the risk to human health and the environment are uncertain without knowing the concentrations. HRMB staff have worked with DOE Oversight Bureau staff to locate the analytical data mentioned in the RFA among the records transferred from the WIPP NMED office to the Santa Fe office, but have been unable to find it. Please provide sampling and analytical data referenced in the WIPP RFA (Section 4.7.2, page 4-50) as the "Facility West" location that was not included. If possible, provide a complete copy of the referenced NMED/WIPP Soil Sampling and Analysis Plan.

3. The method for estimating site background metal concentrations in the Final Voluntary Release Assessment/Corrective Action Report, Section 1.4.1, is inadequate. Rather than calculating a simple mean, apply a more robust statistical technique background determination. Provide a revised Table 1.3 for this report reflecting this different methodology.