

Date: 5/12/10

John E. Kieling, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
E-mail: john.kieling@state.nm.us

Re: Lack of Groundwater Protection Requirements in Proposed Hazardous Waste Permit
for Los Alamos National Laboratory

Dear Mr. Kieling:

I provide the following public comments about the lack of groundwater protection requirements in the proposed Hazardous Waste Permit for Los Alamos National Laboratory (LANL).

The Environmental Protection Agency (EPA) has designated the Española Basin as a sole source aquifer, meaning that the Española Basin is the sole drinking water source for the area between the Jemez and Sangre de Cristo Mountains, running from Tres Piedras, to the north, to almost Galisteo, to the south.

Since operations began in 1943, LANL has buried over 21 million cubic feet of radioactive, hazardous and toxic wastes in unlined pits, trenches and shafts dug into the volcanic tuff. The LANL groundwater monitoring network has been under development since 1998 and has yet to provide reliable and representative samples of groundwater from the regional aquifer.

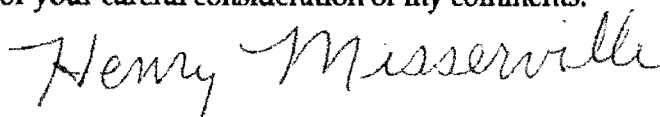
I am particularly concerned about the lack of detection and compliance groundwater monitoring for the "regulated units," Areas G, H and L, at Technical Area 54 (TA-54). I quote the March 19, 2010 written testimony by James Bearzi, Bureau Chief of the NMED Hazardous Waste Bureau:

"... groundwater contamination has already been detected beneath the regulated units at TA-54" p. 62.

Groundwater beneath LANL discharges to the springs at the Rio Grande. Albuquerque residents are already drinking water from the Rio Grande and Santa Fe residents will begin next spring.

It is time to get back to basics. NMED must require LANL to install wells drilled only with air. These wells must be able to detect contamination and provide the necessary information in order to implement corrective action, or "cleanup," in an efficient and cost effective manner. Already too much taxpayer money has been wasted drilling defective wells, collecting and analyzing samples from defective wells and reporting data to the public that is unreliable.

Thank you for your careful consideration of my comments.

Sincerely, 

Name: 24 MATISSE RD
ABQ



Henry Merriall

General



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

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RON CURRY
SECRETARY

CINDY PADILLA
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 25, 2007

David Gregory
Federal Project Director
Los Alamos Site Office, Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, NM 87545

**RE: NOTICE OF APPROVAL
WELL SCREEN ANALYSIS REPORT, REVISION 2
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-05-022**

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and Los Alamos National Security, LLC (collectively, the Permittees) document entitled *Well Screen Analysis Report, Revision 2* (hereafter, the Report) dated May 2007 and referenced by LA-UR-07-2852/EP2007-0249. NMED has reviewed the Report and the response to NMED's April 9, 2007 Direction to Modify, and hereby issues this Notice of Approval.

NMED notes that the conclusions obtained in the Report were derived mainly from analysis of extent data in the literatures, possibly under conditions different from the Los Alamos National Laboratory's site (the site). The absence of critical site-specific data, such as adsorption properties, reaction kinetics and microbial activities, implies that there would be uncertainties and limitations in using the methodology developed in the Report to assess the quality of groundwater samples collected from monitoring wells installed at this site. NMED is especially

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RNG EXHIBIT 2

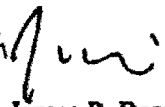
Messrs. Gregory and McInroy
Notice of Approval – WSAR Rev. 2
May 25, 2007
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concerned about the uncertainty with respect to monitoring certain potential contaminants of concern, such as the highly adsorptive radionuclides. NMED therefore suggests that the Permittees consider conducting proper laboratory and field studies to address the uncertainty regarding whether or not the monitoring wells installed as the monitoring network are capable of providing reliable data to monitor potential releases of the highly adsorptive radionuclides from operation of the Laboratory to groundwater.

Should you have any questions or comments, please contact Hai Shen at (505) 476-6039 or John Young at (505) 476-6038.

Sincerely,


James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:hs

- cc: D. Cobrain, NMED HWB
- J. Young, NMED HWB
- H. Shen, NMED HWB
- T. Skibitski, NMED DOE OB
- S. Yanicak, NMED DOE OB, MS J993
- B. Olson, NMED GWQB
- L. King, EPA 6PD-N
- M. Johansen, DOE LASO, MS A316
- C. Mangeng, LANL, ENV, MS J591
- N. Quintana, LANL ECR, MS M992
- J. Dewart, LANL, ENV, MS M992
- A. Simmons, LANL, ENV, MS M992

APPEARING
A MONITORING
NETWORK
INCAPABLE
OF DETECTING
HEAVY
METALS
+ SOLVENTS

IS THIS
HOW YOU
PROTECT
THE PUBLIC?

file: Reading and LANL General (Groundwater)