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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Ground Water Quality Bureau

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Deputy Secretary

February 6, 2020

Frazer Lockhart
Program Manager
Regulatory and Stakeholder Interface
600 6th Street
Los Alamos, NM 87545

David S. Rhodes
Director
Los Alamos Field Office
P.O. Box 1663, MS M984
Los Alamos, NM 87545

RE: Approval, Sources of Groundwater for Land Application under Discharge Permit 1793, Work Plan #5

Dear Mr. Lockhart and Mr. Rhodes:

On June 11, 2019, the New Mexico Environment Department (NMED) Ground Water Quality Bureau received the document titled *Sources of Groundwater for Land Application under Discharge Permit 1793, Work Plan #5* from the U.S. Department of Energy (DOE) and Newport New Nuclear (N3B), collectively the Permittees for Discharge Permit 1793.

As outlined in the associated *Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793 Work Plan #5*, the June 11, 2019, letter identifies the following four activities generating groundwater to be treated and land applied:

1. Legacy water remaining from calendar year 2016 activities.
2. Water generated from well installations in 2017:
 - a. Development, aquifer testing, and extended pumping at new extraction well(s);
 - b. Development, aquifer testing, and injection capacity evaluation at new injection well(s); and
 - c. Monthly sampling at injection wells before injection at these locations.
3. Groundwater generated during operation and maintenance activities at extraction wells and injection wells in 2017.
4. Groundwater generated from routine purging during sampling of contaminant-affected monitoring wells under the NMED-approved 2017 Monitoring Year Interim Facility-Wide Groundwater Monitoring Plan (IFGMP) and up to 5 days of pumping at additional piezometers/monitor wells associated with the Chromium Project.

The Permittees propose in the June 11, 2019, letter to augment and broaden the timeframes of the activities generating groundwater to be treated and land applied as follows:

1. Legacy water generated in a previous calendar year from activities 2 through 4 listed below.
2. Water generated from well installations within the Chromium Project area:
 - a. Development, aquifer testing, and extended pumping at new extraction well(s);
 - b. Development, aquifer testing, and injection capacity evaluation at new injection well(s);
 - c. Development and aquifer testing at new monitoring well(s); and
 - d. Monthly sampling at injection wells before injection at these locations.
3. Groundwater generated during operation and maintenance activities at extraction wells and injection wells within the Chromium Project area.
4. Groundwater generated from routine purging during sampling of contaminant-affected monitoring wells under the current NMED-approved monitoring year IFGMP and up to 5 days of pumping at additional piezometers/monitoring wells associated with the Chromium Project.

The proposed inclusion of groundwaters associated with Chromium Project monitoring wells and the removal of yearly designations for specific activities do not change the quality or significantly change the annual quantity of water being land applied. The groundwater land application volumes specified in Work Plan #5 and DP-1793 will remain the same. Therefore, NMED concurs with the proposed changes to the groundwater sources that may be land applied under Work Plan #5.

Approval of this request does not relieve the Permittees of the responsibility to comply with any other applicable federal, state, and/or local laws and regulations. This approval does not relieve the Permittees of liability should operations associated with this Work Plan result in actual pollution of ground or surface waters.

If you have any questions, please contact Andrew Romero at (505) 827-0076. Thank you for your cooperation.

Sincerely,


Steve Pullen, Manager
Pollution Prevention Section
Ground Water Quality Bureau

SP:ar

Lockhart and Rhodes, DP-1793

February 6, 2020

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cc: Shelly Lemon, NMED/SWQB
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