



N3B-Los Alamos
 1200 Trinity Drive, Suite 150
 Los Alamos, New Mexico 87544
 (505) 257-7690



Environmental Management
 Los Alamos Field Office
 1200 Trinity Drive, Suite 400
 Los Alamos, New Mexico 87544
 (505) 257-7950/FAX (505) 606-2132

Date: July 23, 2021
Refer To: N3B-2021-0250

Michelle Hunter, Chief
 Ground Water Quality Bureau
 New Mexico Environment Department
 1190 S. St. Francis Drive
 Santa Fe, NM 87502-5469

Subject: Request for Deferral of Requirement for an Aquifer Rehabilitation Work Plan and Request for Extension to Revise the Modeling Work Plan

Dear Ms. Hunter:

On May 27, 2021, the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) received the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) letter, "Notice of Non-Compliance, Los Alamos National Laboratory (LANL), Regional Aquifer Wells R-28 and R-42." The notice requested that DOE submit a work plan for NMED's approval within 30 days of the date of the notice "detailing DOE's proposed initial modeling, both conceptual and computer simulation, of the contaminant migration." On June 25, 2021, DOE submitted the "Work Plan for Groundwater Modeling for Contaminant Migration from Wells R-42 and R-28" (modeling work plan) to NMED. NMED's notice also requested that DOE (1) "purge R-28 and R-42 to effectively remove the new contaminants from the regional aquifer" and (2) submit a work plan within 60 days of the date of the notice "detailing the proposed aquifer rehabilitation effort" at R-42 and R-28 (the aquifer rehabilitation work plan).

On July 15, 2021, EM-LA met by phone with staff from the NMED-GWQB to discuss EM-LA's concerns regarding submittal of the aquifer rehabilitation work plan, including the timeframe for submission. EM-LA requested that the aquifer rehabilitation work plan be submitted, if necessary, after EM-LA has collected data from an extended pumping effort that will occur at R-42 and R-28 starting in early August 2021, and more importantly, after EM-LA has completed the requested modeling specified in an approved modeling work plan. Based on these discussions, DOE is requesting deferral of the requirement for an aquifer rehabilitation work plan until after data have been collected and modeling has been completed.

Further, on July 15, 2021, EM-LA received a letter from the NMED-GWQB with extensive comments on the modeling work plan—"Los Alamos National Laboratory, Work Plan for Groundwater Modeling for Contaminant Migration from Wells R-42 and R-28, NMED Response." In the letter, NMED-GWQB states "The Permittees should provide NMED with a revised Work

Plan within 30 days” of the date of the letter. Based on NMED’s comments on the modeling work plan, EM-LA is requesting 60 days from the date of the letter to (1) facilitate technical discussions between EM-LA and NMED-GWQB (including NMED’s decision that EM-LA conduct two modeling approaches instead of one of the two approaches proposed by EM-LA in the modeling work plan) and (2) enable EM-LA to revise the modeling work plan based on NMED’s comments and the outcome of these technical discussions.

Finally, EM-LA respectfully requests that in the future, for documents involving interdependencies of related activities, NMED work with EM-LA to coordinate submittal dates. This would facilitate sequential completion of interdependent activities and would also provide opportunity for technical exchanges between NMED and EM-LA on content and level of anticipated rigor before submittal dates are established.

If you have questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@em-la.doe.gov) or Cheryl Rodriguez at (505) 414-0450 (cheryl.rodriguez@em.doe.gov).

Sincerely,



Troy Thomson
Acting Program Manager
Environmental Remediation
N3B-Los Alamos

Sincerely,

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DURAN

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ARTURO DURAN
Date: 2021.07.22
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Arturo Q. Duran
Compliance and Permitting Manager
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

cc (letter emailed):

Laurie King, EPA Region 6, Dallas, TX
Chris Catechis, NMED-DOE-OB/-RPD
Steve Yanicak, NMED-DOE-OB
Patrick Longmire, NMED-GWQB
Steve Pullen, NMED-GWQB
Andrew Romero, NMED-GWQB
Neelam Dhawan, NMED-HWB
Christopher Krambis, NMED-HWB
Ricardo Maestas, NMED-HWB
Peter Maggiore, NA-LA
Arturo Duran, EM-LA
John Evans, EM-LA
Stephen Hoffman, EM-LA
Cheryl Rodriguez, EM-LA
Thomas McCrory, EM-LA
Kenneth Ocker, EM-LA
Hai Shen, EM-LA
Jennifer Payne, LANL
Felicia Aguilar, N3B

William Alexander, N3B
Sharon Brady, N3B
Emily Day, N3B
Thomas Harrison, N3B
Debby Holgerson, N3B
Jeff Holland, N3B
Danny Katzman, N3B
Kim Lebak, N3B
Joseph Legare, N3B
Dana Lindsay, N3B
Pamela Maestas, N3B
Christian Maupin, N3B
Jason Moore, N3B
Joseph Murdock, N3B
Joseph Noll, N3B
Gerald O’Leary III, N3B
Bruce Robinson, N3B
Troy Thomson, N3B
Steve Veenis N3B
Tashia Vigil, N3B
Steve White, N3B
emla.docs@em.doe.gov
n3brecords@em-la.doe.gov
Public Reading Room (EPRR)
PRS website

Pamela T. Maestas

From: Romero, Andrew C, NMENV <AndrewC.Romero@state.nm.us>
Sent: Friday, July 23, 2021 2:38 PM
To: Pamela T. Maestas; Hunter, Michelle, NMENV
Cc: Pullen, Steve, NMENV; Longmire, Patrick, NMENV; Emily M. Day; Regulatory Documentation; cheryl.rodriguez@em.doe.gov; Christian T. Maupin; Kenneth Ocker; Danny Katzman; Bruce A. Robinson
Subject: RE: Submittal to NMED on 7/23/2021 of Rqst, Defer R-42/R-28 Aquifer WP Rqmt, Extend Rev Modeling WP

Good afternoon Pamela,

GWQB acknowledges receipt of this submittal.

Thank you,

Andrew C. Romero

Environmental Scientist, Pollution Prevention Section
Ground Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Dr
(505) 660-8624
andrewc.romero@state.nm.us

From: Pamela T. Maestas <pamela.maestas@em-la.doe.gov>
Sent: Friday, July 23, 2021 2:15 PM
To: Hunter, Michelle, NMENV <Michelle.Hunter@state.nm.us>
Cc: Pullen, Steve, NMENV <steve.pullen@state.nm.us>; Romero, Andrew C, NMENV <AndrewC.Romero@state.nm.us>; Longmire, Patrick, NMENV <Patrick.Longmire@state.nm.us>; Emily M. Day <Emily.Day@em-la.doe.gov>; Regulatory Documentation <RegDocs@EM-LA.DOE.GOV>; cheryl.rodriguez@em.doe.gov; Christian T. Maupin <Christian.Maupin@em-la.doe.gov>; Kenneth Ocker <kenneth.ocker@em.doe.gov>; Danny Katzman <danny.katzman@em-la.doe.gov>; Bruce A. Robinson <bruce.robinson@em-la.doe.gov>
Subject: Submittal to NMED on 7/23/2021 of Rqst, Defer R-42/R-28 Aquifer WP Rqmt, Extend Rev Modeling WP

Ms. Hunter,

Attached for submittal is a pdf of the following:

- Request for Deferral of Requirement for an Aquifer Rehabilitation Work Plan and Request for Extension to Revise the Modeling Work Plan (N3B-2021-0250)

Please acknowledge receipt of this submittal by responding to this email.

Let me know if you have any questions.

Thank you.

Pamela T. Maestas

Regulatory Documentation Manager

Newport News Nuclear BWXT-Los Alamos, LLC
c. 505-927-7882
regdocs@em-la.doe.gov



1200 Trinity Drive, Suite 150
Los Alamos, NM 87544