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GROUND WATER
 QUALITY BUREAU

Date: February 24, 2022
 Refer To: N3B-2022-0063

Justin Ball, Acting Chief
 Ground Water Quality Bureau
 New Mexico Environment Department
 1190 S. St. Francis Drive
 P.O. Box 5469
 Santa Fe, NM 87502-5469

Subject: Response to New Mexico Environment Department Ground Water Quality Bureau Request for Additional Information for Los Alamos National Laboratory Underground Injection Control Wells, Discharge Permit 1835

Dear Mr. Ball:

On January 10, 2022, the U.S. Department of Energy Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) received the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) letter, "Request for Additional Information for Los Alamos National Laboratory Underground Injection Control Wells, Discharge Permit 1835."

In the letter, NMED-GWQB noted that the renewal and modification application for Discharge Permit 1835 (DP-1835) proposed an increase in the quantity discharged from 648,000 gallons per day (gpd) to 1,500,000 gpd. NMED-GWQB also noted that EM-LA/N3B did not provide any calculations nor groundwater modeling to support the requested increase. As such, NMED-GWQB requested that a groundwater model and supporting documentation that demonstrate and display the following be submitted within 45 days of the date of the letter:

1. The reasoning for the proposed increase of the injection rate with supporting calculations
2. Evidence that the aquifer can take the proposed additional daily injection rate
3. The location and depth of penetration of the new injection points
4. That the requested increased rate and injection wells will perform as expected to control plume migration along the entire thickness of the plume
5. That the requested increased rate and new injection locations will not create undesirable plume movement

A meeting was held on January 20, 2022, between NMED-GWQB, NMED Hazardous Waste Bureau (HWB), EM-LA, and N3B personnel to discuss the requirements. In response to item #1

listed above, the parties discussed that the intention of the increased injection capacity included in the application was to provide an upper regulatory bound for possible injection scenarios that may occur in the future but which are not specifically identified at this time. This upper bound would likely ensure that DP-1835 would not have to be modified to incorporate new injection scenarios that may be proposed under the Chromium Interim Measure and Characterization Work Plan (Work Plan) or other regulatory process. EM-LA/N3B estimated the type of injection capacity that could potentially be needed in the 5-yr effective term of DP-1835 following approval of the DP-1835 permit application with modification submitted to NMED-GWQB on July 8, 2021. EM-LA/N3B acknowledges that regulatory approvals need to be obtained before the installation and operation of any new injection well; NMED-HWB would review and approve any new injection well through a drilling work plan submitted by EM-LA/N3B. Additionally, EM-LA/N3B will obtain approval to drill any new injection wells from the New Mexico Office of the State Engineer.

Regarding items #2 through #5, EM-LA is currently preparing the Work Plan, which is a milestone under the 2016 Compliance Order on Consent and is due to NMED-HWB by September 30, 2022. All the requested information in items #2 through #5 will be captured within the Work Plan. EM-LA/N3B are requesting an extension of submittal of the information required by NMED-GWQB to September 30, 2022, to allow the appropriate time to assess the requirements and incorporate the information into the Work Plan.

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,

Sincerely,



Joseph Murdock
Program Manager
Environment, Safety and Health
N3B-Los Alamos

ARTURO DURAN

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Arturo Q. Duran
Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

cc (letter emailed):

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