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PETER MAGGIORE
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August 27, 1999

Mr. Michael Zamorski
Acting Area Manager
Kirtland Area Office
U. S. Department of Energy
P. O. Box 5400
Albuquerque, NM 87185-5400

Mr. Les E. Shephard
Director
Geoscience and Environment Center
Sandia Corporation
P. O. Box 5800, MS 0701
Albuquerque, NM 87185-0701

**RE: SUMMARY REPORT OF GROUND-WATER INVESTIGATIONS AT
TECHNICAL AREA V, OPERABLE UNITS 1306 AND 1307, MARCH 1999
(VOLUMES 1 AND 2)**

Dear Mr. Zamorski and Mr. Shephard:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the subject document. The RPMP has determined that the document meets the main objectives of the ground-water summary report, as specified in the 2nd Notice of Deficiency, issued by the HRMB on March 27, 1998, for the "Results of the Technical Areas III and V RCRA Facility Investigation" (dated June 1996).

With respect to the subject document, the RPMP has the following comments:

1. Page 5-3, Piper Trilinear Diagrams, 2nd paragraph and Figure 5.2.1-1 -- Based on the data shown on this diagram, RPMP concludes that ground-water samples from Group A wells contain slightly more chloride and slightly less bicarbonate than samples from Group B wells; the proportion of sulfate does not differ significantly between the two groups.
2. Page 5-3, Piper Trilinear Diagrams, 3rd paragraph and Figure 5.2.1-2 -- Based on the data shown on this diagram, the proportion of sulfate remains essentially constant.



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3. Figure 6.6.2-1 -- Water-level data indicate that the water-table mound is located in the general area of the Liquid Waste Disposal System (LWDS) drainfield. This implies that the drainfield received more liquid waste than the LWDS surface impoundments and the TA-V seepage pits regardless of what information may have been included in historical records for the site. Attachment 1 (Sandia Engineering Reactor Manual, July 1968) documents that liquids were sometimes disposed of in the drainfield in a way which bypassed the "LWDS" (the manual seems to imply that the holding tanks alone were considered by reactor engineers at that time as being the "LWDS"; the drainfield was separate from the "LWDS"). It is therefore possible that the volume of wastewater bypassing the holding tanks may not have been included in the historical records, as this wastewater was believed at the time not to contain radioactive contamination.

4. Section 7.3.1-5, Recommendations -- HRMB agrees with the recommendations made in these five subsections. HRMB wishes to meet with U. S. Department of Energy (DOE) and Sandia National Laboratories (SNL) personnel to discuss when this work will commence and when it will be completed. This meeting should be arranged to occur within 30 days receipt of this letter.

If you have any questions or comments, please contact William Moats of my staff by telephone at (505) 827-1558 ext. 1050.

Sincerely,



Robert S. (Stu) Dinwiddie, Ph.D.
Manager, RCRA Permits Management Program

cc: James P. Bearzi, HRMB/NMED
Stephanie Kruse, HRMB/NMED
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