

April 20, 2007

Mr. Ron Curry, Secretary  
New Mexico Environment Department  
P.O. BOX 26110, Rm. N - 4050  
Santa Fe, New Mexico 87502

Dear Secretary Curry,

Thank you for your Department's March 26, 2007 response letter regarding nickel contamination at the Mixed Waste Landfill monitoring well MW1. The Department acknowledges that MW1 has elevated concentrations of nickel and concludes that this is the result of corrosion from the type 304 stainless-steel screen that was installed in the well.

Citizen Action sent an April 4, 2007 letter to NMED which apparently crossed in the mail with your March 26 letter. We pointed out that sampling from monitoring well MW3 also is showing, for the first time in 2006, levels of chromium exceeding the Maximum Contaminant Level (MCL) by one and a third times. The Annual Groundwater Monitoring Report SAND2007-1199P (March 2007) states "The chromium concentrations are attributed to corrosion of the stainless steel screens in the monitoring wells." Additionally, monitoring well MW3 pumped its sample from the sump and is obviously going dry as is BW1 which NMED now requires DOE/SNL to replace with a new well at an appropriate upgradient location.

The chromium in MW1 now also is above twice the MCL. The nickel in MW1 and MW3 is at a high level.

If the high levels of chromium and nickel are indicative of a plume, a compliance monitoring program is required under RCRA. If the high levels of chromium and nickel are from corrosion, there is a need to replace the monitoring wells MW1 and MW3.

Sandia has claimed well screen corrosion for the presence of nickel and chromium contamination for more than the past ten years. On this score, the NMED just issued a April 2007 letter to LANL requiring replacement of recently discovered monitoring wells with corrosion problems. Should not this also be the enforced practice at the MWL as required by the Consent Order with Sandia?

The Consent Order with Sandia, just as with LANL, requires adherence to the RCRA *RCRA GROUND-WATER MONITORING: DRAFT TECHNICAL GUIDANCE*.

From page 6-30:

"The presence of corrosion products represents a high potential for the alteration of ground-water sample chemical quality. The surfaces where corrosion occurs also present

potential sites for a variety of chemical reactions and adsorption. These surface interactions can cause significant changes in dissolved metal or organic compounds in ground-water samples (Marsh and Lloyd, 1980). According to Barcelona et al. (1983), even purging the well prior to sampling may not be sufficient to minimize this source of sample bias because the effects of the disturbance of surface coatings or accumulated corrosion products in the bottom of the well are difficult, if not impossible, to predict.”

Citizen Action recommends that NMED require replacement of the MW1 and MW3 monitoring wells due to both corrosion and the fact that MW3 has gone dry and is pumping samples from the sump.

Sincerely,

David B. McCoy, Executive Director  
Citizen Action New Mexico  
POB 4276  
Albuquerque, NM 87196  
505 262-1862  
[dave@radfreenm.org](mailto:dave@radfreenm.org)

cc: Secretary Ron Curry