



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

August 10, 2001



Mr. Steve Zappe, Project Leader
New Mexico Environment Department
Hazardous Waste Bureau
2905 E. Rodeo Park Drive, Bldg. 1
Santa Fe, NM 87505

RE: Resolution of Comments Associated with the Solid Waste Management Units
Sampling and Analysis Plan

Dear Mr. Zappe:

The Carlsbad Field Office (CBFO) has prepared this letter to summarize the content of the conference call held on July 24, 2001. Participants of the call included:

- Mr. Steve Zappe and Mr. Will Fetner, New Mexico Environment Department (NMED),
- Mr. Jody Plum, CBFO,
- Ms. Koreen Guillermo and Mr. Steve Travis, WTS,
- Mr. Robert Zimmer, Harding ESE.

In its letter dated December 4, 2000, the NMED responded with comments on the Sampling and Analysis Plan (SAP). In this letter, the NMED found the SAP to be "sufficiently complete to proceed". However, the NMED asked that the comments attached to the letter be addressed to meet department standards for technical adequacy. In a letter dated January 3, 2001, the CBFO responded to the NMED's comments on the SAP.

The purpose of the subject conference call was to further discuss the *WIPP Sampling and Analysis Plan for Solid Waste Management Units and Areas of Concern* (DOE/WIPP 00-2014, Rev.0) (SAP) submitted by CBFO to NMED in May 2000. NMED and CBFO were intent on clearly delineating the path forward to assure adequacy of any future field work conducted on the Solid Waste Management Units (SWMU) at WIPP, to allow closure of this matter.

The conference call on July 24, 2001 addressed two outstanding issues: (1) additional investigatory activities suggested by the NMED in the December 4, 2000 letter, and (2) No Further Action (NFA) status for the remaining SWMUs and Areas of Concern (AOCs) included in Module VII of the WIPP Hazardous Waste Facility Permit (Permit).



During the call, you stated that the CBFO has submitted adequate documentation to justify a request for NFA for all but four SWMUs. You also requested that CBFO submit one NFA report, which includes information supporting a NFA request for all the SWMUs.

The majority of the remaining discussion focused on sampling activities for the following SWMUs:

- 001l WIPP 12 mudpit
- 001q DOE-1 mudpit
- 001x WIPP-13 mudpit
- 004a Portacamp Storage Yard, West Side

The NMED requested that the sampling locations proposed by the CBFO in the SAP be augmented. The participants agreed on the sampling locations presented on the attached figures. In summary, the CBFO will collect samples as follows:

- 001L – shallow and deep samples at five locations, one deep sample at a sixth location; analyze all samples for barium,
- 001q – shallow and deep samples at five locations, one deep sample at a sixth location; analyze all samples for chromium, lead, and nickel,
- 001x – shallow and deep samples at four locations, one deep sample at a fifth location; analyze all samples for barium, chromium, and lead,
- 004a – shallow and deep samples at four locations, one deep sample at three additional locations; analyze all samples for chromium and nickel. Based on discussions, Methanol was deleted as an analyte for samples collected at this SWMU.

The participants agreed that the purpose of the sampling was to delineate the vertical and horizontal extent of constituent concentrations above background. Samples will be collected at a sufficient distance outside the horizontal and vertical dimensions of the SWMUs to obtain samples representing background concentrations of the constituents. Once this delineation is completed, no further investigations would be required for these four SWMUs. The participants agreed that the proposed sampling locations could be modified as necessary to meet actual field sampling conditions.

The enclosed figures represent a modification to the SAP. As specified in Section VII. M of the Permit, the CBFO requests written approval of these modifications to the SAP from the NMED so that the field investigations can be initiated in a timely manner. In addition, Section VII. N of the Permit requires the CBFO to notify the NMED in writing at least 10 days prior to any field sampling. The CBFO hereby notifies the NMED that

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plans have been developed to conduct the field investigations during the week of August 20, 2001. Consequently, written approval of the proposed investigations is desired from the NMED prior to initiating the investigations to assure the NMED concurrence with this proposal and the NFA status for the other SWMUs and AOCs listed in the Permit.

If you have any questions regarding this letter, please contact Mr. Jody Plum at (505) 234-7462.

Sincerely,

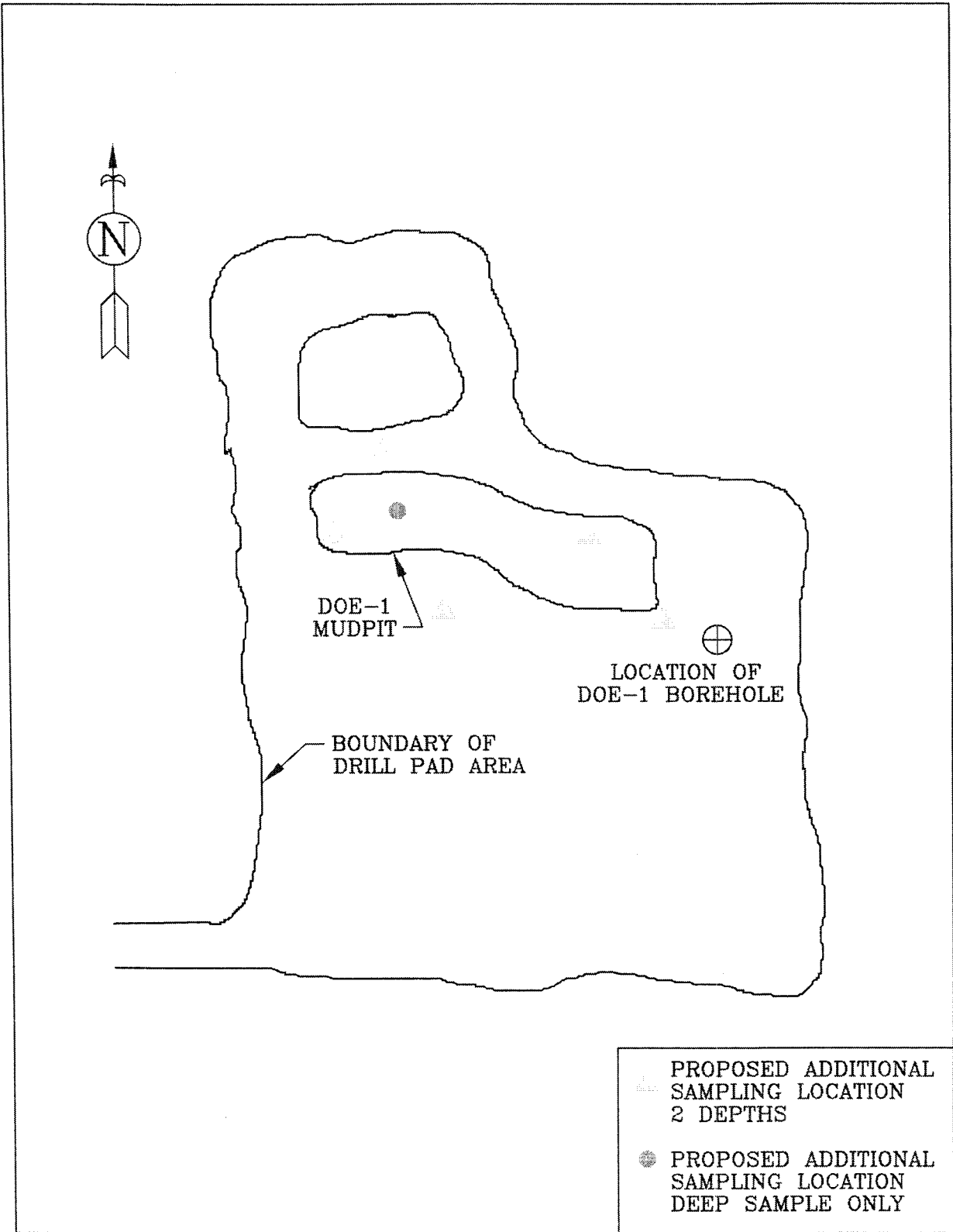


Cynthia A. Zvonar
Assistant Manager
Office of Regulatory Compliance

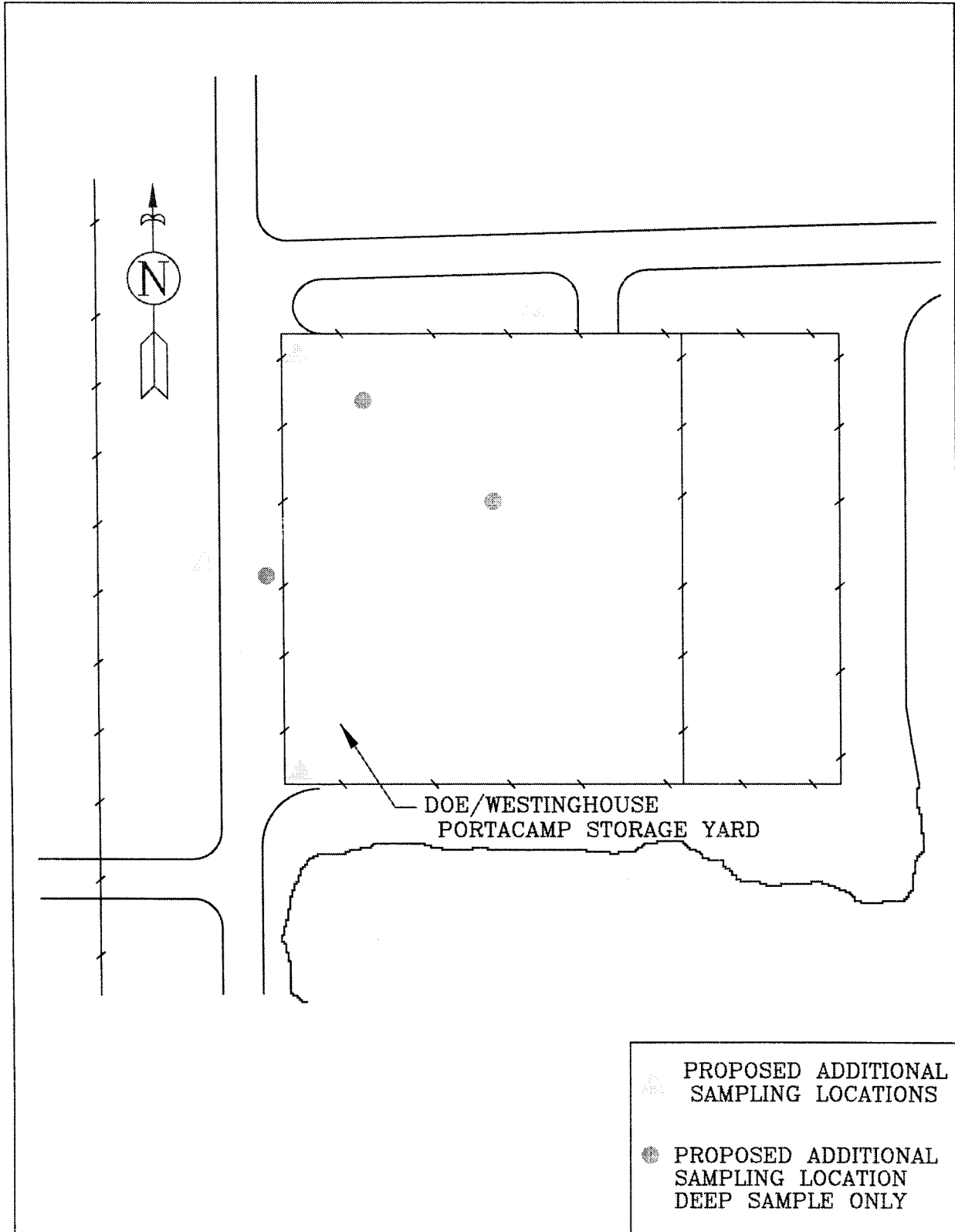
Enclosure

cc: w/o enclosure
J. Plum, CBFO

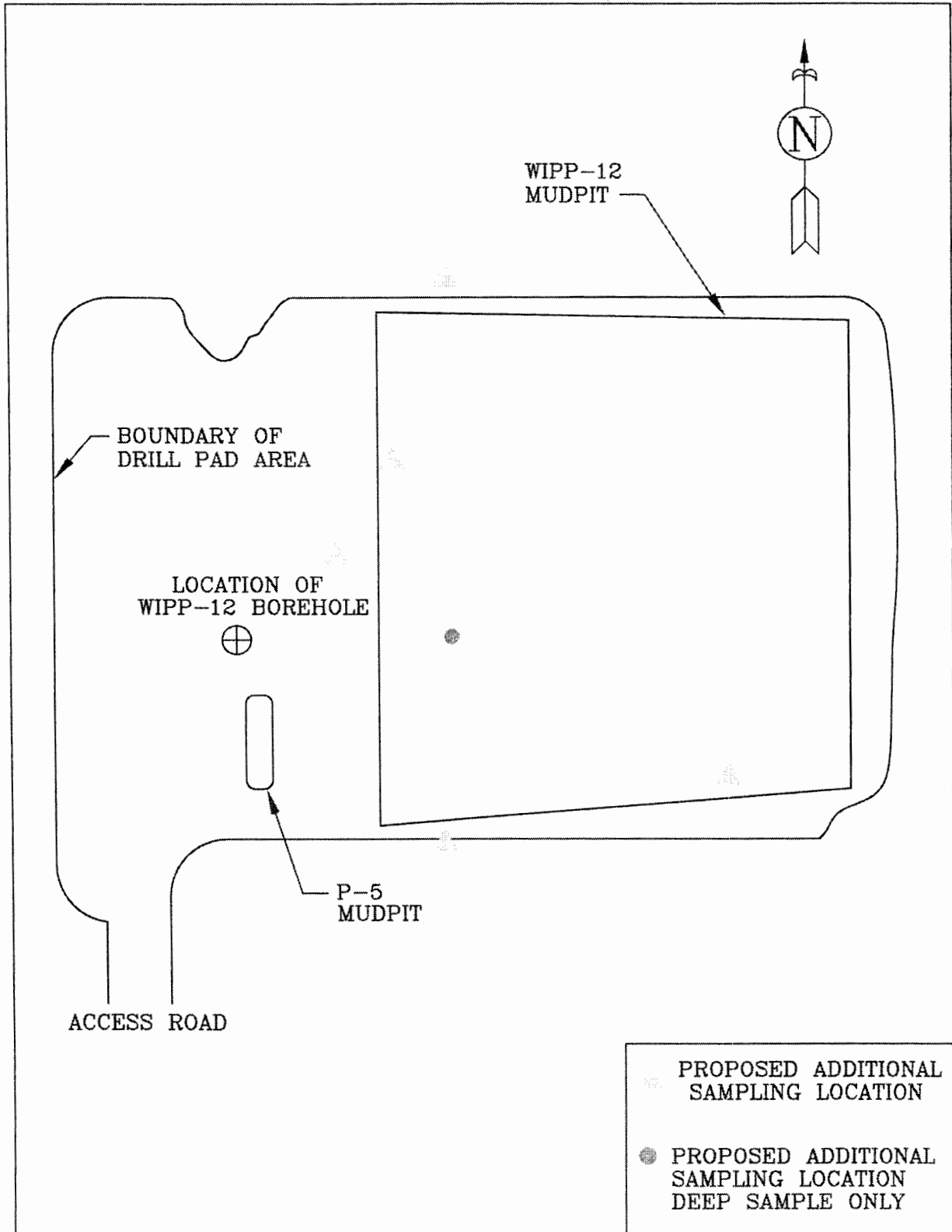
RFA SAMPLE LOCATION MAP FOR SWMU 001q (DOE-1)



SAMPLE LOCATION MAP SWMU 004a (PORTACAMP STORAGE YARD)



SAMPLE LOCATION MAP SWMU 001L (WIPP-12 & P-5)






SAMPLE LOCATION MAP SWMU 001x (WIPP-13)



BOUNDARY OF
DRILL PAD AREA

WIPP-13
MUDPIT

LOCATION OF 
WIPP-13 BOREHOLE

-  PROPOSED ADDITIONAL SAMPLING LOCATIONS
-  PROPOSED ADDITIONAL SAMPLING LOCATION DEEP SAMPLE ONLY