



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

July 27, 2023

Daryl Hauck, Ph.D.  
Manager  
U.S. Department of Energy  
NNSA/Sandia Field Office  
P.O. Box 5400, MS 0184  
Albuquerque, NM 87185

David Stuhan  
Director  
Sandia National Laboratories  
P.O. Box 5800, MS-0915  
Albuquerque, NM 87185

**RE: APPROVAL  
CLASS 2 PERMIT MODIFICATION  
SANDIA NATIONAL LABORATORIES, NEW MEXICO  
EPA ID#NM5890110518  
HWB-SNL-23-009**

Dear Dr. Hauck and Mr. Stuhan:

The New Mexico Environment Department (NMED) has completed review of the *Request for Modification No. 23-024 to Resource Conservation and Recovery Act (RCRA) Facility Operating Permit, Sandia National Laboratories, New Mexico, Environmental Protection Agency Identification Number NM5890110518*, dated March 27, 2023, and received on March 30, 2023. The request for the Permit Modification was submitted by the U.S. Department of Energy/National Nuclear Security Administration (DOE/NNSA) on behalf of itself and National Technology & Engineering Solutions of Sandia, LLC (collectively, the Permittees).

In the submittal, the Permittees proposed to revise the Mixed Waste Landfill (MWL) Long-Term Monitoring and Maintenance Plan (LTMMP), which is incorporated by reference into Permit Attachment M, *Long-Term Monitoring and Maintenance Plan for Solid Waste Management Units and Areas of Concern Granted Corrective Action Complete with Controls*. The MWL is designated as Solid Waste Management Unit (SWMU) 76.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313  
Telephone (505) 476-6000 - [www.env.nm.gov](http://www.env.nm.gov)

The revisions proposed by the Permittees include a work plan to plug and abandon groundwater monitoring well MWL-MW4, which has only been used for groundwater elevation measurements since 2014. The well was drilled from December 1992 to February 1993 in the northern unclassified area of the MWL to sample soil, soil vapor, and groundwater beneath Trench D. It was drilled and completed at an angle of six degrees from vertical with two discrete 20-foot screened intervals, 20 feet apart, and equipped with an inflatable packer to hydraulically isolate the two screens, in order to evaluate groundwater quality, the vertical potentiometric gradient, and changes in aquifer parameters with depth.

The well MWL-MW4 is not needed for compliance monitoring or to monitor the potentiometric surface elevation of the regional aquifer. The well is deteriorating due to its age, and the complicated construction and inflatable packer make it difficult to maintain. Replacement is not recommended, as additional groundwater elevation data is not needed, and replacement would require installation through the landfill cover including the vegetative soil cover and biointrusion layer. In addition, the potential exists for this well to act as a conduit for contaminant migration based upon the age, angled orientation, and unique construction. The more recently installed groundwater monitoring wells (MWL-BW2, MWL-MW7, MWL-MW8, and MWL-MW9) make up the current compliance groundwater monitoring network and provide the groundwater quality and elevation data necessary to meet the MWL LTMMP requirements to ensure that conditions remain protective of human health and the environment. Details of the proposed permit modification can be found in the redline/strikeout version and the revised/clean documents that were attached to the permit modification request.

Following review of the Permittee's request, NMED determined that the removal of well MWL-MW4 from the LTMMP would be a Class 2 Permit Modification. Further, NMED also determined that SNL had fulfilled all the requirements of 20.4.1.900 NMAC [incorporating 40 CFR § 270.42(b)], including providing a public comment period and holding a public meeting within the timeframes specified by 40 CFR § 270.42(b). SNL and NMED received one public comment on the proposed permit modification during the 60-day comment period. The comment was submitted by the Albuquerque Bernalillo County Water Utility Authority. NMED's response to the comment is attached and also may be viewed on NMED's webpage at <https://www.env.nm.gov/hazardous-waste/snl-mwl-2/>.

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NMED hereby approves the modification of the LTMMP and for SNL to abandon the monitoring well MWL-MW4. The modification to the Permit is documented in the enclosed Attachment, which the Permittees must incorporate into Permit Attachment M (LTMMP) upon receipt of this letter. The approval shall become effective thirty (30) days after the date of this letter. The revised and approved Attachment M of the Permit is enclosed.

If you have any questions regarding this letter, please contact Dave Cobrain at (505) 690-5802.

Sincerely,

Ricardo Maestas  
Acting Chief  
Hazardous Waste Bureau

cc: N. Davidson, NMED HWB  
D. Cobrain, HWB  
C. Amindyas, NMED HWB  
L. King, EPA Region 6 (6LCRRC)  
S. Zappitello, SNL  
L. Tello, SNL  
A. Bodour, SNL  
A. Reiser, SNL  
D. Jesus, SNL

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