

March 1, 2007

Carl Edlund
Director of Multi-Media and
Permitting Division
Environmental Protection Agency Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Edlund,

We would appreciate your bringing the enclosed request by Citizen Action New Mexico to the attention of the US EPA National Risk Management Research Laboratory to perform an analysis of the well monitoring network at the Sandia National Laboratories' Mixed Waste Landfill (MWL). We have also provided along with the report a CD Rom containing additional useful information for the laboratory. The request is also for consideration of the New Mexico Environment Department report by William Moats which uses an analysis for the monitoring well network we believe is in contradiction of earlier reports by R. Ford and S.D. Acree regarding the Los Alamos National Laboratory Well Screen Analysis Report.

Citizen Action has written this report in consultation with Robert Gilkeson, Registered Geologist. The MWL consisted of unlined pits and trenches containing up to 700,000 cu ft of hazardous and radioactive wastes that overlie the drinking water supply for the City of Albuquerque. Early detection of contamination to protect the Albuquerque drinking water supplies requires an adequate Resource Conservation and Recovery Act (RCRA) compliant well monitoring system.

We believe that a RCRA monitoring system has never been in place at the MWL and that the system cannot provide reliable and representable water samples for numerous reasons: the wells do not measure the two flow systems present at the MWL; wells are in the wrong location given the direction groundwater flow; there is no appropriately placed background monitoring well; several of the 7 wells were drilled with mud-rotary drilling methods and/or contaminated with bentonite grout; 2 well screens are across different strata, and; improper sampling methods are being used. There is inappropriate analysis of the groundwater flow rate based on a flawed statistical analysis of wells which have their screens in differing strata. There is evidence of nickel contamination that has incorrectly been attributed to well-screen corrosion.

We would greatly appreciate your forwarding this report and the accompanying CD Rom to the EPA laboratory at Ada, Oklahoma.

Sincerely,

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