

**HARPER George A**

**From:** gdenise@flash.net  
**Sent:** Tuesday, April 06, 2004 10:43 AM  
**To:** George A. Harper  
**Subject:** Comments of Air and Ground Water Permits



NMAQ



NMGW

omments.doc (28 Kb) mments.doc (24 Ki) George:

Attached please find GL's comments on the air and ground water permits. Please call me at either (505) 426-0177, (505)454-1503 home office numbers or my cell (505) 259-3004 if you have questions.

I apologize for inconvenience of not getting these to you sooner. We got hammered by a spring snow storm this weekend that has paralyzed the area. We had over three inches of moisture in the snow we received.

Thanks,  
Denise

**U.S. NUCLEAR REGULATORY COMMISSION**  
 In the Matter of LOUISIANA ENERGY SERVICES, LP  
 Docket No. 70-3103-ML Official Exhibit No. 15  
 OFFERED by: Applicant/Licensee Intervenor NERS/PC  
                   NRC Staff                   Other \_\_\_\_\_  
 IDENTIFIED on \_\_\_\_\_ Witness/Panel G. Rice  
 Action Taken: ADMITTED REJECTED WITHDRAWN  
 Reporter/Clerk: \_\_\_\_\_

**GL Environmental, Inc.**  
**Comments On**  
**New Mexico Ground Water Discharge Permit**

**A. Specific Comments.**

**Attachment B**

In the last sentence of the first paragraph, there should be an addition that states that the Multi-Sector General Storm Water Permit will regulate storm water.

In paragraph two there is discussion of "residual dry products". These should be better described and consideration to making the commitment to maintain a certain amount of moisture in the pond to prevent air borne particulates. The thickness of the liner and liner type should be provided if one has been selected. If not options should be provided.

Page 2, the use of the term, "may be" should be avoided. This term is speculative and uncertain and causes the New Mexico Ground Water Bureau (NMGWB) concern. In the second to the last sentence, the "p" in pollution should be capitalized.

**4a. Quantity**

The two TEEB's with different rates is confusing and will raise questions. Copies of calculation sheets should be provided for "Methods Used To Meter or Calculate Discharge Volume". These sheets should be included as an attachment and referenced. Calculations provided should be in a manner that can be duplicated or easily understood by the NMGWB.

**4.b Quality**

In Note 3, there is a typo. The sentence should read "of Hobbs". The NMGWB typically was an approximation of concentrations. Without this information the application may be ruled "Administratively Incomplete".

#### **5. Ground Water Conditions**

Copies of drill logs should be provided and referenced. Under "Ground Water Conditions", will information on the fault under NEF be provided?

#### **6 a.i. Construction Materials**

The section is blank. Options for construction material should be provided. Approximations of liner thickness should be provided. The type of fences should be better described.

#### **Monitoring Plan**

The Monitoring Plan should be a separate document.

#### **6.b.i**

Sulfate should be included as a constituent.

#### **Closure Plan**

The Closure Plan should have some discussion about the final disposal of the tails on the UBC Pad. This is an issue and at a minimum the various options should be presented with the caveat that other options are also being explored.

#### **7.b**

**LES-00122**

The ponds at the petroleum recycling facility should be included.

9.a

Reference drill logs and provide copies.

**LES-00123**