



# IRM-RMMSO Official Correspondence Form

<b>Name:</b>	U1102434			
<b>Title:</b>	Response to Permitting Inquiry Concerning Septic Tank Leachfield Systems for TA-49 Interagency Fire Center Los Alamos Sportsman's Club and Discharge Permit DP-1589			
<b>Date Received:</b>	12/13/2011			
<b>Addressee Name:</b>	C. Beard, PADOPS			
<b>Originator:</b>	R. George, NMED			
<b>Action Item Description:</b>				
<b>Action Due Date:</b>				
<b>Responsible for Action:</b>	Search			
<b>Responsible Office:</b>				
<b>Distribution:</b>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;">                     Michael J. Graham                      Elizabeth D. Sellers                      C. A. Beard                      David J. McInroy                      Phoebe K. Suina                      William Z. Alexander                      Tina M. Sandoval                 </td> <td style="width: 50%; vertical-align: top;">                     Charles F. McMillan                      Richard A. Marquez                      Deborah K. Woitte                      Michael T. Brandt                      Anthony R. Grieggs                      Paul Henry                      Scotty Jones                 </td> </tr> </table>		Michael J. Graham Elizabeth D. Sellers C. A. Beard David J. McInroy Phoebe K. Suina William Z. Alexander Tina M. Sandoval	Charles F. McMillan Richard A. Marquez Deborah K. Woitte Michael T. Brandt Anthony R. Grieggs Paul Henry Scotty Jones
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NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Ground Water Quality Bureau*

SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

Harold Runnels Building  
1190 St. Francis Drive  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-2918 Fax (505) 827-2965  
www.nmenv.state.nm.us

DAVE MARTIN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

EP2011-5552

December 12, 2011

Robert Beers, Environmental Protection Division  
Water Quality and RCRA Group  
Los Alamos National Laboratory  
P.O. 1663, Mail Stop K490  
Los Alamos, New Mexico 87545

**RE: Response to Permitting Inquiry Concerning Septic Tank Leachfield Systems for TA-49 Interagency Fire Center, Los Alamos Sportsman's Club and Discharge Permit, DP-1589**

Dear Mr. Beers:

The New Mexico Environment Department (NMED) is in receipt of your response to a request for additional information concerning the septic tank/leachfield systems for the Interagency Fire Center (located on TA-49) and the Los Alamos Sportsman's Club (received on September 29, 2011). Your response included enclosures that support Los Alamos National Laboratory's (LANL) claim that these septic tank/leachfield wastewater treatment and disposal systems lie upon separate "lots" as defined under the New Mexico Liquid Waste Disposal and Treatment Regulations (20.7.3 NMAC), and can therefore be permitted under these regulations. Based upon this information, NMED has concluded that these wastewater treatment and disposal systems are not required to be included in LANL's application for Discharge Permit DP-1589, which is intended to regulate all discharges to septic tank/leachfield systems on the Laboratory's property. This conclusion negates the need to conduct supplemental public notifications concerning LANL's application associated with DP-1589, as had been previously discussed. With resolution of this issue, NMED is hopeful that a draft of DP-1589 can be made available for public comment soon and the permitting process can proceed.

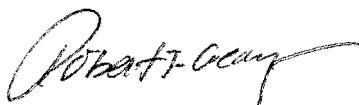
The nature of LANL's permits/license agreements with the TA-49 Interagency Fire Center and the Los Alamos Sportsman's Club appears to place the responsibility for environmental permitting with these entities, therefore a Liquid Waste Specialist from NMED District II will be attempting to contact representatives from each entity to resolve permitting of these facilities under the Liquid Waste Disposal and Treatment Regulations. The Liquid Waste Specialist may

Robert Beers, LANL  
TA-49 Interagency Fire Center and LA Sportsman's Club ST/LF Systems  
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contact you seeking contact information for these entities (if necessary). NMED is aware that the wastewater treatment and disposal systems at these facilities may not be fully permitted and/or some of these systems may be in a state of failure. Please be advised that if the representatives of these entities are non-responsive to NMED's attempts to address any permit issues under the Liquid Waste Program, the Department may seek to have LANL intervene pursuant to its permits/license agreements with these entities. Also be advised that pursuant to 20.7.3 NMAC, a property "owner" is responsible for "storing, treating and disposing of liquid waste on that property", which could mean that LANL remains responsible for the discharges on these lots.

Your assistance in helping to clarify and conclude this matter is greatly appreciated. If you have any questions, please feel free to contact me at (505) 476-3648.

Sincerely,



Robert J. George  
Domestic Waste Team Leader  
NMED Ground Water Quality Bureau

RG/rjg

CC: Steve Yanicak, LASO-GOV, LANL, P.O. 1663, MS M894, Los Alamos, NM 87545  
Gene Turner, LASO-EO, LANL, P.O. 1663, MS A316, Los Alamos, NM 87545  
Carl A. Beard, PADOPS, LANL, P.O. 1663, MS A102, Los Alamos, NM 87545  
J. Chris Cantwell, ADESHQ, LANL, P.O. 1663, MS K491, Los Alamos, NM 87545  
Mike Saladen, ENV-RCRA, LANL, P.O. 1663, MS K490, Los Alamos, NM 87545  
Andy Erickson, UI-DO, LANL, P.O. 1663, MS K760, Los Alamos, NM 87545  
Walter E. Atencio, ESHQ-DR, LANL, P.O. 1663, MS P908, Los Alamos, NM 87545  
Mell Smithour, ES-UI, LANL, P.O. 1663, MS K718, Los Alamos, NM 87545  
Charles Barnett, UI-OPS, LANL, P.O. 1663, MS J972, Los Alamos, NM 87545  
Robert Italiano, Manager, NMED District II  
James Vincent, Liquid Waste Specialist, NMED District II  
DP-1589 File (Gerald Knutson)