



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Ground Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

EP2012-5255

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 15, 2012

Anthony R. Grieggs
Group Leader, Water Quality & RCRA
P.O. Box 1663, MS M704
Los Alamos, NM 87545

Gene Turner
Environmental Permitting Manager
Environmental Projects Office
Los Alamos Site Office
U.S. Department of Energy
Mail Stop A316,
Los Alamos, NM 87545

RE: Response to Notice of Intent to Discharge; Request for Additional Information for Potable Water Dust Suppression and Decontamination at Technical Area (TA) 54 Disposal Pit 38, Los Alamos National Laboratory, AI:856 (PRD20120005)

Dear Mssrs. Grieggs and Turner:

The New Mexico Environment Department (NMED) received a Notice of Intent (NOI) on August 13, 2012 (copy enclosed) for the discharge of approximately 7,000 gallons per day (gpd) of potable water used for the decontamination and dust suppression of 350 low-level radioactive waste bins at TA-54 Pit 38 for a period of approximately 22 days. An amendment to the NOI, dated September 17, 2012 (copy enclosed) was received by NMED on September 18, 2012 and stated that the previously proposed volume would be reduced to 1,700 gpd through internal management and conservation efforts. The proposed discharge is located at TA-54, approximately two miles west of White Rock, in Section 31, Township 19N, Range 07E, within the boundaries of Los Alamos National Laboratory, Los Alamos County.

NMED has reviewed the Notice of Intent in accordance with the New Mexico Water Quality Control Commission Regulations (20.6.2 NMAC). The following additional information is necessary in order for NMED to determine if the proposed discharge will require a Ground Water Discharge Permit:

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1. Information in the NOI provided the dimensions and capacity for Pit 38 however, it did not specify to which areas within Pit 38 disposal of the decontamination water would occur and by what methods. NMED requests that methods of disposal and distribution along with the dimensions of the actual discharge area be submitted.
2. On October 1, 2012, the NMED Hazardous Waste Bureau required a Solid Waste Management Unit Assessment be conducted for Pit 38 and submitted by January 2, 2013 (copy enclosed). Based on the potential outcome of this assessment and the authority for regulation under the March 2005 Compliance Order on Consent, the NMED Ground Water Quality Bureau is requesting a copy of the report prior to making a determination on whether a Discharge Permit would be required for the proposed discharge. Please provide a copy of the Solid Waste Management Unit Assessment Report to NMED upon completion.

Following submission of the requested additional information, NMED will respond to your Notice of Intent. If you have any questions, please contact either Jennifer Fullam at (505) 827-2909 or me at (505) 827-0027.

Sincerely,



Clint Marshall, Program Manager
Pollution Prevention Section
Ground Water Quality Bureau

CM:JF

Enc: Notice of Intent dated August 13, 2012
Amendment to Notice of Intent dated September 17, 2012
Letter from NMED Hazardous Waste Bureau dated October 1, 2012

Cc: Robert Italiano, District Manager, NMED District II (w/enclosures)
NMED Santa Fe Field Office (w/enclosures)
County File (w/enclosures)
James Hogan, NMED SWQB (w/o enclosures)
Richard Powell, NMED SWQB (w/o enclosures)
John Kieling, NMED HWB (w/o enclosures)
Steven Yanicak, NMED-DOE-Oversight Bureau (w/o enclosures)
Hai Shen, LASO-EPO, Los Alamos National Laboratory, Los Alamos NM 87545 (w/o enclosures)
Carl Beard, PADOPS, Los Alamos National Laboratory, A102, Los Alamos, NM 87545 (w/o enclosures)
Michael T. Brandt, ADESH, Los Alamos National Laboratory, K491, Los Alamos, NM 87545 (w/o enclosures)

COR-BTD-10. 10. 2012 - 473527

Mssrs. Grieggs and Turner, AI:856 (PRD20120005)

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