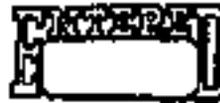


# Los Alamos

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545



Tim ✓  
Martyn ✓ MK  
Chris ✓  
LOOK ? ✓

## memorandum

TO: Distribution

DATE: February 13, 1996

FROM: Alex A. Puglisi, ESH-18

MAIL STOP/TELEPHONE: K4977-4882

SYMBOL: ESH-18/WQ&H-96-0057

SUBJECT: **NO DISCHARGE PLAN REQUIRED FOR DISPOSAL OF SAMPLING TOOL  
DECONTAMINATION RINSE WATER**

As requested by several individuals, I am distributing the attached copy of a letter from the New Mexico Environment Department (NMED) referencing a determination made by the NMED that a Discharge Plan (DP) is not required for small discharges of rinsewater from the decontamination of sampling tools used in the investigation of Solid Waste Management Units (SWMUs). This letter is in response to several Notices of Intent to Discharge (NOIs) submitted by ESH-18 to cover decontamination activities at SWMUs.

In their letter, the NMED references specific NOIs submitted by ESH-18 and applies the "No DP Requirement" only to specific activities and conditions listed in those NOIs. For example, the NMED's waiver of a discharge plan is specific to low volume discharges characteristic of the amounts used to wash hand held sampling equipment. Further, there also cannot be any solvents (i.e., methanol) used in the decontamination rinse water. All necessary precautions should be implemented to ensure that any rinsewater discharged under this "No Discharge Plan Required" coverage meets these requirements. Please remember, the NMED's determination does not apply to large volume discharges or to the disposal of rinse water mixed with solvents. A NOI is still required for these types of discharges.

Several people have inquired whether the rinse water referenced under NMED's "No DP Required" coverage has to be containerized prior to discharge. This requirement is never referenced by the NMED in their decision and the NOIs submitted by ESH-18 specifically stated that rinsate will be discharged directly onto the sampling site. Therefore, it seems apparent that rinse water does not have to be containerized prior to discharge if it meets all conditions specified by NMED.

There does not appear to be a maximum ceiling placed on the total amount of rinsate discharged during the complete investigation of any one site. However, unusually large volumes would most likely lead to a re-evaluation of NMED's "No DP Required" determination. It should be noted that there is a maximum ceiling imposed for the total volume which can be discharged at each site on a daily basis.

If you have any questions regarding this matter, please feel free to contact me at 667-4882, Mike Alexander at 665-4752, or Mike Saladen at 665-6085.

AP/em

### Distribution:

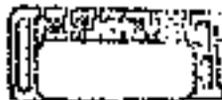
- D. McInroy, EM/ER, MS M992
- A. Pratt, EM/ER, MS M992
- G. Allen, EM/ER, MS M992
- G. Gould, ESA-4, MS G787
- B. Martin, CST-18, MS B525



12758

LAUL / NOW HSWA REG

LAUL - General (Notice of Intent to Discharge, NOI)



February 13, 1996

Distribution (Cont'd.):

C. Rofer, EES-1, MS D462  
M. Salazar, EM/ER/D&D, MS M769  
K. Zamora, DOE/LAAO, MS K497  
S. Rac, ESH-18, MS K497  
M. Alexander, ESH-18, MS K497  
R. Reynolds, ESH-18, MS K497  
P. Shanley, ESH-19, MS K498  
R. Conrad, ESH-19, MS K490  
J. Jacobson, SAIC, Los Alamos, New Mexico

Cy: WQ&H File, MS K497



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Ground Water Protection and Remediation Bureau  
Harold Ronale Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2918 phone  
(505) 827-2965 fax



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 20, 1995

Steven Rae  
Los Alamos National Laboratory  
ESH-18, MS K497  
Los Alamos, N.M. 87545

RE: "NO DP REQUIRED" for decontamination of glove and  
sampling equipment at Los Alamos National Laboratory

Dear Mr. Rae:

The New Mexico Environment Department (NMED) has received several Notices of Intent to Discharge (NOIs) from Los Alamos National Laboratory (LANL) for the discharge of up to 6 gallons per day of deionized water used for the purpose of rinsing soil sampling equipment (ref: ESH-18/WQ&E:95-131, ESH-18/WQ&E:95-0293, and ESH-18/WQ&E:95-269).

This letter provides a general "No Discharge Plan Required" coverage for decontamination projects as described in your NOIs dated March 9, 1995, June 8, 1995, and June 28, 1995. Be advised that EPA's guidance for Management of Investigation-Derived Wastes, OERR Directive 9345.3-02 February, 1991, covers these types of activities.

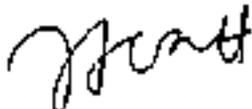
In accordance with WQCC Regulation 3-104, a discharge plan is not being required because these discharges are unlikely to generate leachate that will move directly or indirectly into ground water.

Although a discharge plan is not being required for these discharges, you are not relieved of liability should your operation result in actual pollution of surface or ground waters. Further, this decision by the NMED does not relieve you of your responsibility to comply with any other applicable federal, state, and/or local laws and regulations, such as zoning requirements, plumbing codes and nuisance ordinances.

Mr. Dennis Erickson  
December 20, 1995  
Page 2

If you have any questions, please contact John Rogers of the  
Ground Water Pollution Prevention Section staff at 827-  
2713.

Sincerely,



Marcy Leavitt, Chief  
Ground Water Quality Bureau

ML:JBR/jbr

Xc: Garth Graves, District Manager, NMED Dist. I  
Alex Puglisi, LANL, ESH-18, MS K497  
Mike Saladen, LANL, ESH-18, MS K497  
Glenn Saums, NMED/SWQB  
WOI file