

FILE HSWA LANL GEN/MISC/15



State of New Mexico
ENVIRONMENT DEPARTMENT
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*To Beards
Teri D -*

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November 21, 1996

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NM ENVIRONMENT DEPARTMENT
OFFICE OF THE SECRETARY

Mr. Steven Rae
Group Leader (ESH-18):96-0438
Mail Stop K497
Los Alamos National Laboratory
Los Alamos, NM 87545

RE: NOI for Water Supply Floor Drains

Dear Mr. Rae:

Your Notice of Intent to Discharge (NOI) under Section 1-201 of the New Mexico Water Quality Control Commission (NMWQCC) Regulation sent to Mr. Ed Kelley, Ph.D., has been forwarded to the Surface Water Quality Bureau (SWQB) for comment.

The purpose of the NOI was to address regulatory coverage for discharges of potable water to floor drains from the existing water supply facilities of the Los Alamos Water Supply System which were not included under the Laboratory's National Pollutant Discharge Elimination System (NPDES) Permit.

SWQB views your reference to "small discharges" and EPA's apparent agreement that these "small discharges" are not appropriate for permitting under an NPDES Permit with concern since there is no reference in the regulations about exempting discharges due to size.

Also, it is not clear why EPA would not require this discharge to be permitted due the fact that you mentioned intermittent flow from once-through cooling water, sand samplers and pumps in addition to the potable water, would also be part of this discharge. SWQB therefore requests that a written verification of EPA's decision be sent to NMED.

In addition, since the Laboratory's Waste Stream Corrections (WSC) Project recommended this discharge be curtailed, SWQB would like to know what other options DOE/LANL considered before the decision to go the discharge to a watercourse was made.

SWQB requests response to the requested information be made within fifteen days of the receipt of this letter. If you have questions concerning this letter you may call me at (505) 827-2827. It is my understanding comments from Groundwater are forthcoming under separate cover.

Sincerely,

Glenn Saums
Program Manager
Point Source Compliance Section
Surface Water Quality Bureau

cc: Ed Kelley, Ph.D., Director, WWMD
Dale Doremus, HPM, GWQB
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