

John Young

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HSWA LANL 6/10/2000

July 7, 2000



Steven Rae, Group Leader
Water Quality and Hydrology Group
Los Alamos National Laboratory
MS K497
Los Alamos, New Mexico 87502

RE: Reporting Discharges of Investigation Derived Waste to the New Mexico Environment Department

Dear Mr. Rae:

This letter serves as a follow up to the May 8, 2000 meeting with representatives from the Los Alamos National Laboratory (LANL) and the New Mexico Environment Department (NMED). Discussions at the meeting addressed approaches to streamlining the reporting of discharges of Investigation Derived Waste (IDW). The following summarizes the discussion:

The NMED, Surface Water Quality Bureau (SWQB) and Ground Water Quality Bureau (GWQB) have been receiving and responding to Notices of Intent (NOIs) as described by the Water Quality Control Commission (WQCC) Regulation 1201 from LANL for wastewater discharges of Investigation Derived Waste (IDW). In addition, the Hazardous Materials Bureau (HMB) has reviewed NOIs for the same discharges that were reviewed by to the SWQB, and the GWQB. In accordance with the Water Quality Act (WQA), Section 74-6-12 Limitations. B., and WQCC Regulation 4105.A.2., the WQCC Regulations may not be the primary authority of IDW generated from activities regulated under the Hazardous Waste Act or the Resource Conservation and Recovery Act. The primary authority to regulate the discharge of IDW would in most cases be HMB.



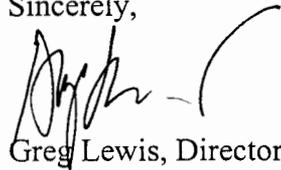
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In order to provide a single point of contact for LANL and to streamline the review of proposed discharges of IDW, the NMED requests that LANL submit a written request for each discharge of wastewater generated from surveillance and R wells to the HMB and a courtesy copy to the GWQB and the SWQB. The requests must contain water quality and erosion potential data to expedite the decision for proper disposal. Upon initial review of analytical data, HMB will determine if the waste is a RCRA waste or concern. If HMB determines that the IDW is not a RCRA waste or concern, HMB may contact the GWQB and/or SWQB for determination of compliance with WQCC regulations.

The NMED looks forward to working with LANL to further define a policy for handling, reporting, and disposing of IDW. If you have any questions or comments, please contact Phyllis Bustamante at 827-0166, or John Young at 827-1567.

Sincerely,



Greg Lewis, Director
Water and Waste Management Division

GL/PAB/pab

xc: Barbara Hoditscheck, DOE-OB
Phyllis Bustamante, GWQB
John Young, HMB