



Permit
Department of Energy
 Albuquerque Operations
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

Kelly
See page 2
-Glenn

MAY 06 1987

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

SURFACE WATER
 QUALITY BUREAU

McCall

Ms. Ellen Caldwell
 Permits Branch (6W-PS)
 U. S. Environmental Protection Agency
 Region VI
 Allied Bank Tower
 1445 Ross Avenue
 Dallas, Texas 75202-2733

Dear Ms. Caldwell:

**RE Application to Discharge to Waters of the United States National
 Pollutant Discharge Elimination System (NPDES) Permit No. NM0028355**

I have reviewed the public notice, fact sheet, and the proposed NPDES Permit No. NM0028355, and offer the following comments.

Page 4 of Part I

In my permit modification request dated January 20, 1987, I requested Category 02A-Boiler Blowdown be reinserted in the permit because proposed Outfall 129 consisted of boiler blowdown and additional boiler blowdown outfalls were anticipated in the near future (e.g., see my letter of April 20, 1987 requesting reactivation of Outfall 007-Boiler Blowdown). Although Category 02A was added to the proposed permit in Part III, I recommend that a new page describing Category 02A and including the reference to proposed Outfall 129 be added to the permit prior to page 4 that describes Category 03A. By such action, the permit would list chronologically Outfall Categories 01A, 02A, 03A, 04A, 05A, and 06A.

Page 18 of Part I

The permit limitations proposed for Outfall 128 establish limitations on flow. Because the existing effluent limitations for all of the other effluent categories and outfalls referenced in Permit No. NM0028355 do not place limitations on flow, but rather require flow be monitored and reported, I request that the proposed flow limitation for Outfall 128 be supplanted by a flow reporting requirement.

The proposed effluent limitations for Total Iron and Total Copper are based on discharge concentrations of 1.0 mg/l daily average and 2.0

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mg/l daily maximum. In consideration of the published effluent guidelines 40 CFR Part 413-Electroplating Point Source Category, specifically, Subpart H Printed Circuit Board Subcategory (40 CFR 413.80 et seq.) where Total Copper limitations are established at 2.7 mg/l daily average and 4.5 mg/l daily maximum, I request that the proposed effluent limitations for Total Copper be based on Discharge concentrations of 2.0 mg/l daily average and 4.0 mg/l daily maximum for consistency with the point source guidelines and assured conformance with the latest treatment technology.

As the parameter Total Iron is not toxic and does not present any known adverse health effects for humans, I request that the proposed effluent limitations for Total Iron be based on discharge concentrations of 2.0 mg/l daily average and 4.0 mg/l daily maximum for consistency with other outfalls regulated at more liberal concentrations (see Outfalls 050, 051, and 129) by Permit No. NM0028355 for the Total Iron parameter.

Lastly with regard to proposed Outfall 128, because of the uncertainty of the anticipated flow range of the effluent, I request that all mass limitations be based on a daily average flow of 3000 gallons per day (GPD) and that 5000 GPD be used as the daily maximum flow for permitting purposes.

Page 20 of Part I

The permit limitations proposed for Outfall 129 establish limitations on flow. Following the above-mentioned rationale for proposed Outfall 128, I request that the proposed flow limitation for Outfall 129 be supplanted by a flow reporting requirement.

Page 4 of Part III

As included in the permit modification request of January 20, 1987 and for consistency with the other effluent categories in Permit No. NM0028355, I request that the letter "I" be added to the enumeration of paragraphs listed in paragraph G. ADDITIONAL OR DELETED OUTFALLS.

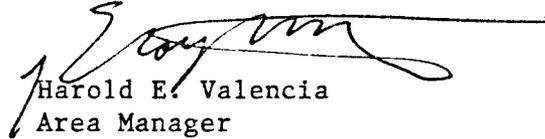
By copy of this letter to the New Mexico Environmental Improvement Division, the provisions of Section 1-201 and 3-106.B. of the New Mexico Water Quality Control Commission Regulations are met.

E. Caldwell

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Thank you for the opportunity to comment on proposed Permit No. NM0028355. Should you have further questions concerning these comments or the permit modification request of January 20, 1987, please feel free to contact James Phoenix (FTS 843-5288) of my staff.

Sincerely,


Harold E. Valencia
Area Manager

Enclosures:
As stated

cc:
Michael Burkhart, Director, NMEID, Santa Fe, NM
Kathleen Sisneros, NMEID, Santa Fe, NM
James Highland, USEPA, Region VI, Dallas, TX

LTP:JAP:0593