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MARK E. WEIDLER
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 15, 1997

G. Thomas Todd, Area Manger
Los Alamos National Laboratory (LANL)
ADO, MS A120
Los Alamos, New Mexico 87544

RE: Additional Information Request for Renewal, LANL, Sanitary
Wastewater System Consolidation (SWSC) Plant, DP-857

Dear Mr. Todd:

The New Mexico Environment Department (NMED), Ground Water Quality Bureau (GWQB) received your response dated August 18, 1997, to the request for additional information from the GWQB dated July 9, 1997. From review of your response and further review of the discharge plan including monitoring reports, it has been determined that the following issues will need to be resolved prior to discharge plan renewal.

Monitoring Plan

NMED does not believe that the current monitoring plan is adequate to determine if the discharge from the SWSC plant could cause contaminant concentrations in ground water to exceed Water Quality Control Commission (WQCC) Regulation 3103 standards. The original monitoring plan approved in the July 20, 1992 discharge plan approval (DP-857) was established to monitor ground water in Canada Del Buey (CDB) due to the proposed discharge of wastewater to CDB. LANL submitted a modification request dated July 31, 1995 to decrease the frequency of monitoring ground water in monitor well CDBO 6 because wastewater was not being discharged to CDB. Although wastewater currently is not discharged to CDB, well CDBO 6 should continue to be monitored quarterly to determine if the wastewater holding impoundment and/or sludge drying beds are impacting the alluvial aquifer in CDB. In addition, NMED is requesting the following monitoring replace the original monitoring plan for the discharge permit. The proposed changes are to insure



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that wastewater discharged to the holding impoundment, the sludge drying beds, or wastewater discharged through outfalls to Sandia Canyon will not adversely impact ground water. NMED believes that the following monitoring would be more appropriate for the discharge from the SWSC plant:

A. Quarterly Reporting

1. effluent volumes from the wastewater treatment plant recorded monthly and submitted quarterly,
2. the percentage of wastewater from the SWSC plant discharged through each outfall, and
3. quarterly samples from the holding impoundment at the SWSC plant, and outfalls 001 and 01S to Sandia Canyon for analysis of nitrate as nitrogen (NO₃), total Kjeldahl nitrogen (TKN), chloride (Cl), and total dissolved solids (TDS).

B. Annual Reporting

1. annual samples from the holding impoundment and CDBO 6 for analysis of:
 - a. radiochemistry: gross alpha particle activity, radium 226 and 228,
 - b. metals: silver (Ag), arsenic (As), barium (Ba), cadmium (Cd), cyanide (CN), chromium (Cr), fluoride (Fl), mercury (Hg), lead (Pb), selenium (Se), copper (Cu), iron (Fe), manganese (Mn), sulfate (SO₄), and zinc (Zn), and
 - c. volatile and semi-volatile organic compounds: EPA methods 8240 and 8270.

Please commit to the above monitoring plan, or submit a revised monitoring plan that will monitor the current discharges to Sandia Canyon, the holding impoundment at the SWSC plant, and CDB.

Contingency Plan

The contingency plan submitted with the original discharge plan application is not adequate for renewal. The plan is limited in that nitrogen is the only constituent that would trigger corrective actions, and it is limited to ground water concentrations in CDB that would exceed WQCC standards. An acceptable contingency plan

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should consist of the following:

- a. In the event that two consecutive quarterly analyses indicate that wastewater from outfalls 01S or 001 exceeds WQCC Regulation 3103 standards, LANL will install a ground water monitor well in Sandia Canyon at a location approved by NMED. The well will be used for quarterly ground water monitoring of NO₃, TKN, Cl, TDS, or any other constituent in wastewater exceeding WQCC Regulation 3103 standards at the outfall.
- b. In the event that any well used for ground water monitoring from SWSC plant discharges indicates concentrations exceeding WQCC Regulation 3103 standards, LANL will notify the GWQB and initiate a review of the treatment system within 30 days. If necessary to meet ground water standards, plant modifications will be implemented.
- c. In the event of a spill from the SWSC Plant, NMED will be notified within 24 hours LANL will notify NMED and will submit all information required by WQCC Regulation 1203.

Please commit to the above contingency plan, or submit a revised contingency plan stating the actions to be taken should a discharge from the SWSC plant cause ground water to exceed WQCC standards in any canyon, or a spill occurs as a result of SWSC plant activities.

Closure Plan

The proposed changes to the closure plan language submitted by LANL are not adequate because they do not address post-closure monitoring in Sandia Canyon where the current discharge occurs. The responses submitted for items 5 and 7 from LANL specified CDB for post closure monitoring and ground water restoration.

Please commit to the post closure monitoring and contingencies submitted in NMED's July 7, 1997 letter, or submit a comprehensive post closure monitoring plan with contingencies for all discharges from the SWSC plant, not only CDB.

NMED agrees with LANL on item 6 and will not require monitor wells to be plugged and abandoned until monitoring for all regulatory programs has been completed.

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Please submit a written response to the above items within 30 days of receipt of this letter. Thank you for your cooperation during the renewal process. If you have any questions, please call me at 827-0166.

Sincerely,

Phyllis Bustamante
Phyllis Bustamante
Water Resource Specialist
Pollution Prevention Section

xc: James Bearzi, District Manager, NMED District II
HRMB
SWQB
DOE Oversight Bureau