

# Los Alamos

NATIONAL LABORATORY

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545

Date: April 13, 2001

In Reply Refer To: ESH-18/WQ&H:01-114

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Mr. Greg Lewis, Director  
Water and Waste Management Division  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

**SUBJECT: REPORTING DISCHARGES OF PURGE WATER AND DEVELOPMENT WATER FROM LABORATORY WELLS**

Dear Mr. Lewis:

The Laboratory's Water Quality and Hydrology Group (ESH-18) is following-up on your letter dated July 7, 2000, regarding the reporting requirements for purge water and development water from Laboratory wells. There have been a number of subsequent discussions and meetings between the Laboratory and NMED staff concerning the submittal of Notices of Intent to Discharge (NOIs) for these water discharges and concerning ways to streamline the process. On December 18, 2000, these matters were addressed at a management meeting between the Laboratory (Richard Burick, Tom Gunderson and Joe Vozella) and NMED (Peter Maggione and yourself). This letter is intended to document our agreements to date on this matter.

Pursuant to your recommendation, the Laboratory is preparing an NOI for the purge water and development water from wells being drilled under the Hydrogeologic Work Plan. The NOI will be submitted to the Ground Water Quality Bureau (GWQB), with copies to the Surface Water Quality Bureau (SWQB) and the Hazardous Materials Bureau (HMB). This NOI will document the Laboratory's management system for handling and disposing of the purge water and well development water from these wells. It is the Laboratory's understanding that a single point of contact from NMED has been assigned by your office to help streamline the review process.

This approach is consistent with the way the Laboratory has historically reported water discharges from its surveillance wells. On June 6, 1996, ESH-18 submitted an NOI for the purging and sampling of environmental surveillance wells. The NOI was submitted to both the SWQB and GWQB pursuant to 20 NMAC 6.2, Section 1201 of the Water Quality Control Commission (WQCC) Regulations. The NOI covered intermittent discharges of 8,500 gallons of water (combined flow) from forty-nine (49) ground water monitoring wells that made up the ground water surveillance network at the Laboratory at that time. The discharges were to be applied in a manner whereby they would not enter a watercourse. On October 23, 1996, the Laboratory received a response from the GWQB stating that a Ground Water Discharge Plan was not required for surveillance well discharges, as long as the discharges were managed as described in the NOI. The Laboratory's Annual Environmental Surveillance Report summarizes water quality from these wells.



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This approach is also consistent with our belief that the WQCC Regulations are the primary authority to regulate these water discharges. Specifically, Section 1201(A) of the Regulations provides:

*Any person intending to make a new water contaminant discharge . . . shall file a notice with the Ground Water Protection and Remediation Bureau of the department for discharges that may affect ground water, and/or the Surface Water Quality Bureau of the department for discharges that may affect surface water.*

We will continue to evaluate the Laboratory's water discharges to determine whether they may be subject to other regulatory authorities. The Laboratory is committed to meeting all applicable regulatory requirements.

We look forward to continuing our work with NMED to complete a process for handling and disposing of purge water and well development water from wells being drilled under the Hydrogeologic Work Plan. Please contact Mike Saladen at (505) 665-6085 if you have questions or need additional information.

Sincerely,

Steven R. Rae

Water Quality and Hydrology Group

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