

*James Bearzi / File*

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GARY E. JOHNSON  
GOVERNOR

November 1, 2001

Michael Ratte  
Project Manager  
URS Corporation  
One Park Square  
6501 American Parkway, NE, suite 900  
Albuquerque, NM 87110-5311

Dear Mr. Ratte:

**RE: LOS ALAMOS/REPAIR AND REPLACEMENT OF CANYON SEWER PIPELINE**

New Mexico Environment Department (NMED) staff reviewed the information on the above-referenced project included in your October 2, 2001, letter to the Department. The following comments are provided based on that information.

**SURFACE WATER QUALITY**

The URS Corporation has submitted for review a preliminary project description (scoping letter) for the repair and replacement of sewer line in Pueblo Canyon. According to the scoping letter, a portion of the existing sewage pipeline was damaged during a high flow event on July 2, 2001.

High flows are expected to occur more frequently as a result of the Cerro Grande Fire, which dramatically altered the hydrologic characteristics of a significant portion of the Pueblo Canyon watershed. The fire removed the vegetation and litter layers, which decreased interception and evapotranspiration. The fire also affected the soils, causing a decrease in infiltration and soil moisture storage. As a result, the fire has amplified the runoff response of the watershed, and a previously minor precipitation event can have major flooding impacts. Therefore, URS is proposing to repair and relocate the existing sewer line to prevent future flood damage, given the altered flow regime.

The scoping letter states that the sewer line repair and replacement project will have a length of 14,170 feet and cover 35 acres. The scoping letter proposes the following three methods of construction with 12-inch HDPE line:



7579

Method	Length of Sewer Line (ft)
Standard trenching, backfilling, and compaction	4,723
Standard trenching, backfilling, and compaction with casing	2,362
Casing installation by boring	7,085

The concerns of the Department's Surface Water Quality Bureau (SWQB) staff related to this project are for compliance with water quality standards and the protection of designated uses. Authorization is required under the Federal Clean Water Act (CWA) if the project involves installing structures in the stream channel, such as gabions for bank stabilization or fill material for stream crossings. Under CWA Section 404, anyone who proposes to discharge dredge or fill material into waters of the United States must obtain a permit from the U.S. Army Corps of Engineers (USACE). Furthermore, CWA Section 401 requires that those responsible for the project also obtain a water quality certification from the state in which the discharge originates. The purpose of the Section 401 State water quality certification is to ensure that the project will comply with applicable water quality standards and the Anti-degradation Policy.

A joint 404/401 application form is available on the USACE website, or from the agencies listed below. The applicant is required to include details of the project and submit the application to both agencies.

U.S. Army Corps of Engineers  
Regulatory Branch  
4101 Jefferson Plaza, NE  
Albuquerque, NM 87109-3435  
(505) 342-3282

<http://www.spa.usace.army.mil/reg/>.

New Mexico Environment Department  
Surface Water Quality Bureau  
401 Certifications  
Harold Runnels Bldg.  
1190 St Francis Dr.  
PO Box 26110  
Santa Fe NM 87502  
(505) 476-3017

Violations of State water quality standards could lead to penalties under the New Mexico Water Quality Act. Section 74-6-10.1 B of the Act states: "Any person who violates any provision of the New Mexico Water Quality Act other than Section 74-6-5 NMSA 1978 or any person who violates any regulation, water quality standard, or compliance order adopted pursuant to that act shall be assessed civil penalties up to the amount of ten thousand dollars (\$10,000) per day for each violation."

Furthermore, the U.S. Environmental Protection Agency (USEPA) requires National Pollutant Discharge Elimination System (NPDES) permit coverage for storm water discharges from construction projects that will result in the disturbance of five or more acres (one or more acres after March 10, 2003). At the present time (until March 10, 2003), most industrial activities (including construction projects) owned or operated by municipalities with a population of fewer than 100,000 are not subject to the federal storm water permitting program. Please note that construction activities, until final stabilization, still on-going after March 10, 2003 will require appropriate NPDES permit coverage.

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However, NMED recommends that all construction projects utilize appropriate Best Management Practices (BMPs) to control or prevent the discharge of pollutants (primarily sediment, oil & grease, and construction materials from construction sites) in storm water from the site. In addition, NMED requires proper disposal of concrete, asphalt, and other such materials (e.g., not in, or adjacent to any watercourse, including dry arroyos). NMED also recommends that permanent stabilization measures (storm water detention/retention structures, velocity dissipation devices, etc.) be implemented post construction to minimize, in the long term, pollutants in storm water runoff from entering these waters.

Another concern with this project is the potential for hazardous waste contamination due to its location downstream of Acid Canyon. This canyon received effluent containing Plutonium and other hazardous constituents during the early operations of Los Alamos National Laboratory (formerly known as Los Alamos Scientific Laboratory) in the 1950s and 1960s. Special consideration should be given to the possibility of radionuclide contamination when working in this area, depending on the extent and effectiveness of remediation efforts. If present, Plutonium has an affinity for attaching to sediment, and this project has the potential to mobilize it in the process of trenching, backfilling, and compacting for the sewer line.

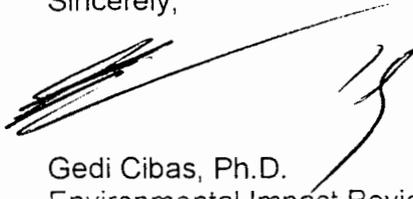
If you require additional information regarding the above, you may contact Mr. Daniel Guevara, SWQB, at (505) 476-3017.

#### GROUND WATER QUALITY

The Department's Ground Water Quality Bureau (GWQB) staff is strongly supportive of this project. Previous flooding in the canyon has resulted in numerous sewer breaks resulting in unauthorized discharges of raw sewage. Any further questions regarding these comments should be directed to Mr. Fred Kalish, GWQB, at (505) 827-2713.

We appreciate the opportunity to comment on this document.

Sincerely,



Gedi Cibas, Ph.D.  
Environmental Impact Review Coordinator

NMED File No. 1523ER