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**Department of Energy**  
National Nuclear Security Administration  
Los Alamos Site Office  
Los Alamos, New Mexico 87544

**AUG 15 2003**



Mr. John Young  
Hazardous Materials Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Mr. Curt Frischkorn  
Ground Water Quality Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Dear Mr. Young and Mr. Frischkorn:

Subject: Amendment to the Notice of Intent to Discharge, Hydrogeologic Workplan Wells

The National Nuclear Security Administration/Los Alamos Site Office (NNSA/LASO), will be managing the next round of drilling under Los Alamos National Laboratory's Groundwater Protection Program. Prior to 2002, all of the Groundwater Protection Program's Hydrogeologic Workplan Wells were installed under the direction of Los Alamos National Laboratory (LANL). In 2003, NNSA/LASO entered into an agreement with the US Army Corps of Engineers to provide subcontracted drilling services to drill, construct, and complete six regional aquifer wells and three intermediate depth wells (See Table 1.0). CY2003 drilling activities are scheduled to begin in August 2003 and conclude by the end of the calendar year.

Table 1.0. CY2003 Hydrogeologic Workplan Wells.

Well Name	Location	Well Type
<i>Hydrogeologic Workplan Wells</i>		
R-1	Mortandad Canyon	Regional aquifer
R-2	Pueblo Canyon	Regional aquifer
R-4	Pueblo Canyon	Regional aquifer
R-11	Sandia Canyon	Regional aquifer
R-26	Canon de Valle	Regional aquifer
R-28	Mortandad Canyon	Regional aquifer
<i>CMS Plan Wells for PRS 16-021(c)</i>		
R-CdV-16-1(i)	Canon de Valle	Intermediate aquifer
R-CdV-16-2(i)	Canon de Valle	Intermediate aquifer
R-CdV-16-3(i)	Canon de Valle	Intermediate aquifer

It is my understanding that during a July 24, 2003, meeting at the NMED, Bob Beers and Mike Saladen, of the Laboratory's Water Quality and Hydrology Group, proposed to Mr. Frischkorn that discharges of drilling and development water from the nine wells listed in Table 1.0 be managed under the original (August 2, 2001) and subsequently revised (July 16, 2002) Notice of Intent to Discharge (NOI) for Hydrogeologic Workplan wells. For your



Mr. Young and Mr. Frischkorn

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convenience, enclosed are copies of the following: (1) the original August 2, 2001, Hydrogeologic Workplan NOI; (2) the July 16, 2002, revision; and (3) your agency's August 7, 2002, response.

Further, it is my understanding that Mr. Frischkorn finds the existing Hydrogeologic Workplan NOI acceptable for use in this next round of drilling contingent upon the inclusion of the three intermediate wells since they were not listed in the original NOI (August 2, 2001, Figure 4-2). I concur with Mr. Frischkorn's assessment and request that intermediate wells R-CdV-16-1(i), R-CdV-16-2(i), and R-CdV-16-3(i) be added to the Hydrogeologic Workplan NOI. Additional information on these three intermediate wells is provided below.

The principal goal of the three intermediate wells cited in the "Addendum to the CMS Plan for PRS-16-021(c), Revision 1" is to determine the extent of contamination in the deep perched zone that is associated with constituent discharges from TA-16 and potentially other nearby sites. Two of the wells, R-CdV-16-2(i) and R-CdV-16-3(i), are mesa-top wells in the vicinity of Canon de Valle. The third well, R-CdV-16-1(i), is located within Canon de Valle.

All water produced during the drilling and development of the intermediate wells will be containerized, sampled, and evaluated for compliance with NM WQCC Regulation 3103 ground water standards and applicable RCRA regulatory limits before any discharge occurs. Decisions regarding the discharge of drilling and development water will be made in accordance with the "Workplan NOI Decision Tree" (Revised-7/15/02) and in coordination with your agency. And finally, drilling and development water approved for discharge will be applied to the land surface or used for dust suppression on access roads or the drill site in accordance with the terms and conditions of the original NOI (August 2, 2001).

Thank you for your consideration of this request. Please call me at (505) 665 5046 if additional information is requested.

Sincerely,



Matthew P. Johansen  
Ground Water Program  
Compliance Manager

OFO:8MJ-001

Enclosures:

cc w/enclosures:

M. Leavitt, NMED/SWQB  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
J. Vozella, OFO, LASO  
M. Johansen, OFO, LASO  
B. Enz, OFO, LASO  
T. Whitacre, OPM, LASO  
J. Holt, ADO, LANL, MS-A104

AUG 15 2003

Mr. Young and Mr. Frischkorn

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C. Nylander, RRES-GP, LANL, MS-M992  
S. Rae, RRES-WQH, LANL, MS-K497  
M. Saladen, RRES-WQH, LANL, MS-K497  
B. Beers, RRES-WQH, LANL, MS-K497  
S. Pearson, RRES-WQH, LANL, MS-K497

cc w/o enclosures:

B. Ramsey, RRES-DO, LANL, MS-J591  
K. Hargis, RRES-DO, LANL, MS-J591  
T. George, RRES-DO, LANL, MS-J591  
D. Stavert, RRES-DO, LANL, MS-J591  
D. Rogers, RRES-WQH, LANL, MS-K497

# Los Alamos

NATIONAL LABORATORY

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545

Date: August 2, 2001  
In Reply Refer To: ESH-18/WQ&H:01-234  
Mail Stop: K497  
Telephone: (505) 665-1859

Mr. John Young  
Hazardous Materials Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Ms. Phyllis Bustamante  
Ground Water Quality Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

**SUBJECT: NOTICE OF INTENT TO DISCHARGE, HYDROGEOLOGIC WORKPLAN WELLS**

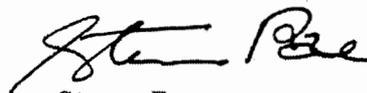
Dear Mr. Young and Ms. Bustamante:

Please find the enclosed Notice of Intent to Discharge (NOI) covering the discharge of drilling, development and sample purge water from the proposed regional aquifer wells described under Los Alamos National Laboratory's Hydrogeologic Workplan. This NOI is being submitted for your review and approval pursuant to Section 1201 of the New Mexico Water Quality Control Regulations. Since April, 1996, the Laboratory has submitted nine individual NOI's for each regional aquifer well constructed under the Workplan. As many as 23 additional regional aquifer wells have been proposed for construction over the next four years.

As an alternative to individual NOIs, the Laboratory is proposing that a single NOI be utilized for all discharges from regional aquifer wells constructed under the Workplan. It is the Laboratory's intent to improve coordination and administration of the NOI process for both the NMED and the Laboratory by eliminating the redundancy of individual NOIs for each well.

Thank you for your consideration of this request. Please call Bob Beers of the Laboratory's Water Quality and Hydrology Group at (505) 667-7969 if additional information would be helpful.

Sincerely,



Steven Rae,  
Group Leader  
Water Quality and Hydrology Group

SR:BB/tml

Enclosures: a/s

Cy: B. Lucas, NMED/SWQB, Santa Fe, New Mexico, w/enc.  
S. Yanicak, NMED/DOE/OB, w/enc., MS J993  
J. Vozella, DOE/LAAO, w/enc., MS A316  
M. Johansen, DOE/LAAO, w/enc., MS A316  
D. McInroy, E-ER, w/enc., MS M992  
R. Bohn, E-ER, w/enc., MS M992  
D. Erickson, ESH-DO, w/enc., MS K491  
L. McAtee, ESH-DO, w/enc., MK K491  
C. Nylander, ESH-18, w/enc., MS K 497  
M. Saladen, ESH-18, w/enc., MS K497  
B. Beers, ESH-18, w/enc., MS K497  
H. Decker, ESH-18, w/enc., MS K497  
WQ&H File, w/enc., MS K497  
IM-5, w/enc., MS A150

*Notice of Intent to Discharge  
Los Alamos National Laboratory  
Hydrogeologic Workplan*

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**NOTICE OF INTENT TO DISCHARGE**  
**WATER PRODUCED DURING THE INSTALLATION AND MONITORING OF**  
**HYDROGEOLOGIC WORKPLAN WELLS**

**Introduction**

In March 1998, NMED approved a comprehensive hydrogeologic characterization work plan for Los Alamos National Laboratory (Laboratory). The Hydrogeologic Workplan (LANL 1998) proposes a multiyear drilling and hydrogeologic analysis program to characterize the Pajarito Plateau and to assess the potential for groundwater contamination from waste disposal operations. The goal of the project is to develop greater understanding of the geology, groundwater flow, and geochemistry beneath the 43-square-mile Laboratory area and to assess any impacts that Laboratory activities may have had on groundwater quality. The Hydrogeologic Workplan (Workplan) will result in an enhanced understanding of the Laboratory's groundwater setting and an improved ability to ensure adequate groundwater monitoring. The centerpiece of the Workplan is the proposed installation of as many as 32 regional aquifer wells.

Beginning with well R-9 in April 1996, the Laboratory has submitted a Notice of Intent to Discharge (NOI) for each Workplan well prior to installation. Table 1.0 below presents a summary of the wells completed to date, the date that the NOI was submitted for each well, and the ESH-18 file number for each respective NOI.

**Table 1.0. Completed Hydrogeologic Workplan Wells.**

<b>Well Name</b>	<b>Completion Date</b>	<b>Watershed</b>	<b>Type of Well</b>	<b>Date of NOI</b>	<b>NOI File No.</b>
R-25	Feb-99	Water/Valle	regional	7/7/98	98-0227
R-9	Sept-99	LA/Pueblo	regional	4/3/96	96-0189
R-15	Sept-99	Mortandad	regional	6/25/99	99-0245
R-12	Jan-00	Sandia	regional	3/27/98	98-0106
R-31	Feb-00	Ancho	regional	5/18/99	99-0165
R-19	Mar-00	Pajarito	regional	1/25/00	00-0019
R-22	Dec-00	Pajarito	regional	12/12/00	00-0412
R-7	Mar-01	LA/Pueblo	regional	2/29/00	00-0063
R-5	June-01	Pueblo	regional	4/10/01	01-0112

For the remaining Workplan wells, the Laboratory proposes to utilize a single, Generic NOI. That is, in lieu of submitting individuals NOIs for each well, as was previously conducted, this NOI is being submitted to comprehensively cover all discharges from regional aquifer wells constructed under the Workplan. It is currently estimated that R-well construction will be completed by 2005.

***Notice of Intent to Discharge  
Los Alamos National Laboratory  
Hydrogeologic Workplan***

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1. **Name and address of facility making the discharge.**  
Los Alamos National Laboratory  
P.O. Box 1663  
Los Alamos, New Mexico 87545
  
2. **Location of the discharge.**  
See attached Map 1.0 for the location of all completed and proposed Hydrogeologic Workplan (Workplan) wells. As prescribed in Standard Operating Procedure (SOP) 2.01, *Surface Water Assessment/Erosion Matrix*, the land application area will be located on the generally flat canyon bottom outside of the active channel. An assessment will be conducted at each proposed land application site prior to discharge.
  
3. **The means of discharge. (to Lagoon, Flowing stream, Water course, Arroyo, Septic tank, other).**  
All water produced during the drilling and development of Workplan wells will be containerized, sampled, and evaluated for compliance with NM WQCC Regulation 3103 ground water standards before any discharge occurs. See attached Figure 1.0, *Workplan NOI Decision Tree*, for further information on the sequence of activities conducted prior to a discharge of water to the environment.

Once it has been confirmed by the ER Project and ESH-18 that the containerized water is compliant with NM WQCC Regulation 3103 ground water standards then the water will be either (1) applied to the surface of the land in the vicinity of the well, or (2) applied to the well site or access roads for dust suppression. Land application will be conducted using the following means:

1. Aluminum piping with sprinkler heads will serve as the conduit for the discharge. A typical installation will consist of two separate piping runs, each approximately 250 feet long with 5 sprinkler heads on each run. Piping runs will be situated to prevent any overlap of spray. Sprinkler heads will be adjusted to maximize evaporation.
  
2. Each sprinkler head has a discharge rate of approximately 16 gallons per minute; ten sprinkler heads will discharge approximately 160 gallons per minute. Therefore, a typical system would have a design capacity of approximately 9,600 gallons per hour, weather and soil conditions permitting.
  
3. Land application will be conducted for 8 to 10 hours a day. The discharge will be monitored routinely during the hours of operation to (1) ensure that no ponding or run-off is occurring, (2) to inspect any BMP's installed on the application site, and (3) to inspect for leaks in the system or malfunctioning sprinkler heads.
  
4. If at any time the land application site shows signs of ponding or run-off, all discharge operations will be immediately halted. The site will be evaluated for the need of any additional BMP's and the discharge will not start again until the site has returned to an appropriate condition (i.e., no standing water or visible run-off).

**Notice of Intent to Discharge  
Los Alamos National Laboratory  
Hydrogeologic Workplan**

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The alternative method of land application is for dust suppression at the drilling site and on access roads serving the drilling site. A water truck will apply water used for dust suppression. A second alternate means of disposal would be discharge to one of the Laboratory's three wastewater treatment facilities (High Explosive Wastewater Treatment Facility, Sanitary Wastewater Systems Facility, Radioactive Liquid Wastewater Treatment Facility) if the quality of the water meets the treatment facility's Waste Acceptance Criteria (WAC) and the treatment facility has adequate capacity available.

**4. The estimated concentration of contaminants (if any) in the discharge.**

The concentrations of contaminants in the discharge are expected to be equivalent to the concentrations of contaminants in the aquifer(s) penetrated during installation of the borehole. The quality of groundwater beneath the Laboratory is characterized and documented annually in the Laboratory's *Environmental Surveillance Report*. The *Environmental Surveillance Report* for 1999 is available on the World Wide Web at the following address: <http://lib-www.lanl.gov/pubs/la-13775.htm>. The *Environmental Surveillance Report* for 2000 is scheduled for release in October 2001.

In addition to the extensive characterization data available from the annual *Environmental Surveillance Reports*, each new Workplan well will also be sampled for specific contaminants of concern. Analyte lists will be prepared on a well-by-well basis. As identified in Figure 1.0, these results will be used to determine compliance with NM WQCC Regulation 3103 ground water standards prior to the commencement of land application. Analytical results will be submitted to the NMED as soon as they are available for release.

**5. The type of operation from which the discharge is derived**

All of the wells referenced in this NOI are part of the Hydrogeologic Characterization Program undertaken by Los Alamos National Laboratory in order to better understand the geologic and hydrologic characteristics of the regional aquifer, intermediate perched zones, and intercalated unsaturated zones at the Laboratory. The discharges from each well are produced from the following three sources:

1. **Drilling Water.** During well drilling, water is produced from two sources:
  - Small quantities of drilling additives (e.g., EZ Mud™, Quick Foam™) are mixed with potable water and used during the drilling process to improve efficiency. Material Safety Data Sheets (MSDS) are available for these products upon request.
  - Groundwater (alluvial, intermediate, and regional) encountered as the borehole penetrates water-bearing strata.

Between 20,000 and 125,000 gallons of drilling water will be produced during the drilling of each Workplan regional aquifer well.

**Notice of Intent to Discharge  
Los Alamos National Laboratory  
Hydrogeologic Workplan**

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In addition to above drilling additives, there is the possibility that drilling mud may be used in the construction of certain Workplan wells. Drilling mud, such as Quick-Gel™, is commonly used during the drilling of wells to: (1) lift cuttings out of the hole, (2) cool the drill bit, and (3) support the walls of the borehole in unconsolidated formations. Drilling fluids containing drilling mud will be isolated in a designated holding tank where the solids will be settled and the water can be decanted. Settled solids will be disposed of at an approved disposal site. Decanted water will be sampled and land applied if compliant with NM WQCC Regulation 3103. Ground Water Standards.

2. **Development Water.** Following well construction, the well is developed to remove any fine material that may be blocking the wells screens or ports. This water is essentially ground water with the potential for small, deminimus, quantities of drilling additives. Between 20,000 and 125,000 gallons of well development water will be produced during the drilling of each Workplan regional aquifer well.
3. **Sampling Purge Water.** Once well construction is complete, each well will be routinely sampled. During sample collection it is necessary to purge the well prior to collecting a sample to ensure that the water sampled is representative of the ground water in the aquifer. Between 100 and 1,500 gallons of water will be produced during each sampling event. Since the volumes of sampling purge water are small and the source is exclusively ground water, it will be directly discharged to the land surface without sampling or containerization. In addition, no sprinkler system will be used during the discharge of sampling purge water. All discharges will be directed away from any surface water.

6. **The estimated flow to be discharged per day.**  
The daily discharge volumes from the land application of drilling and well development water are estimated to be as much as 96,000 gallons per day. Routine well sampling is expected to generate as much as 1,500 gallons of purge water per sampling event. Daily discharge volumes are dependent on the capacity of the soil, weather conditions, and equipment considerations.

7. **The estimated depth to Groundwater.** Depth to the regional aquifer varies from 700 to 1200 feet.

Signed: Steven Rae  
Steven Rae, Group Leader, ESH-18

Date: Aug 2, 2001

Signed: Julie A. Canepa  
Julie Canepa, Program Manager, ER Project

Date: 8/2/01

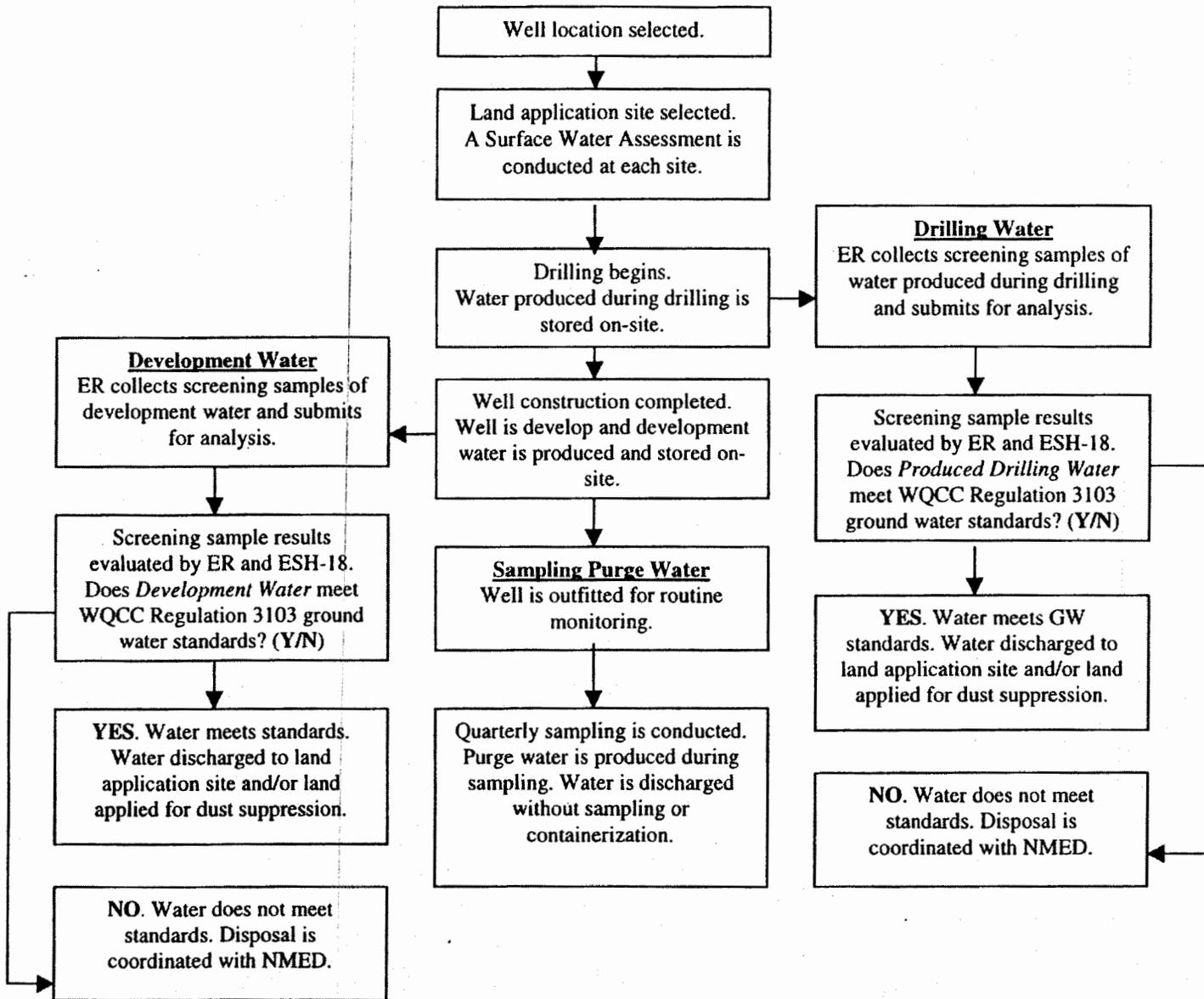


Figure 1.0. Workplan NOI Decision Tree

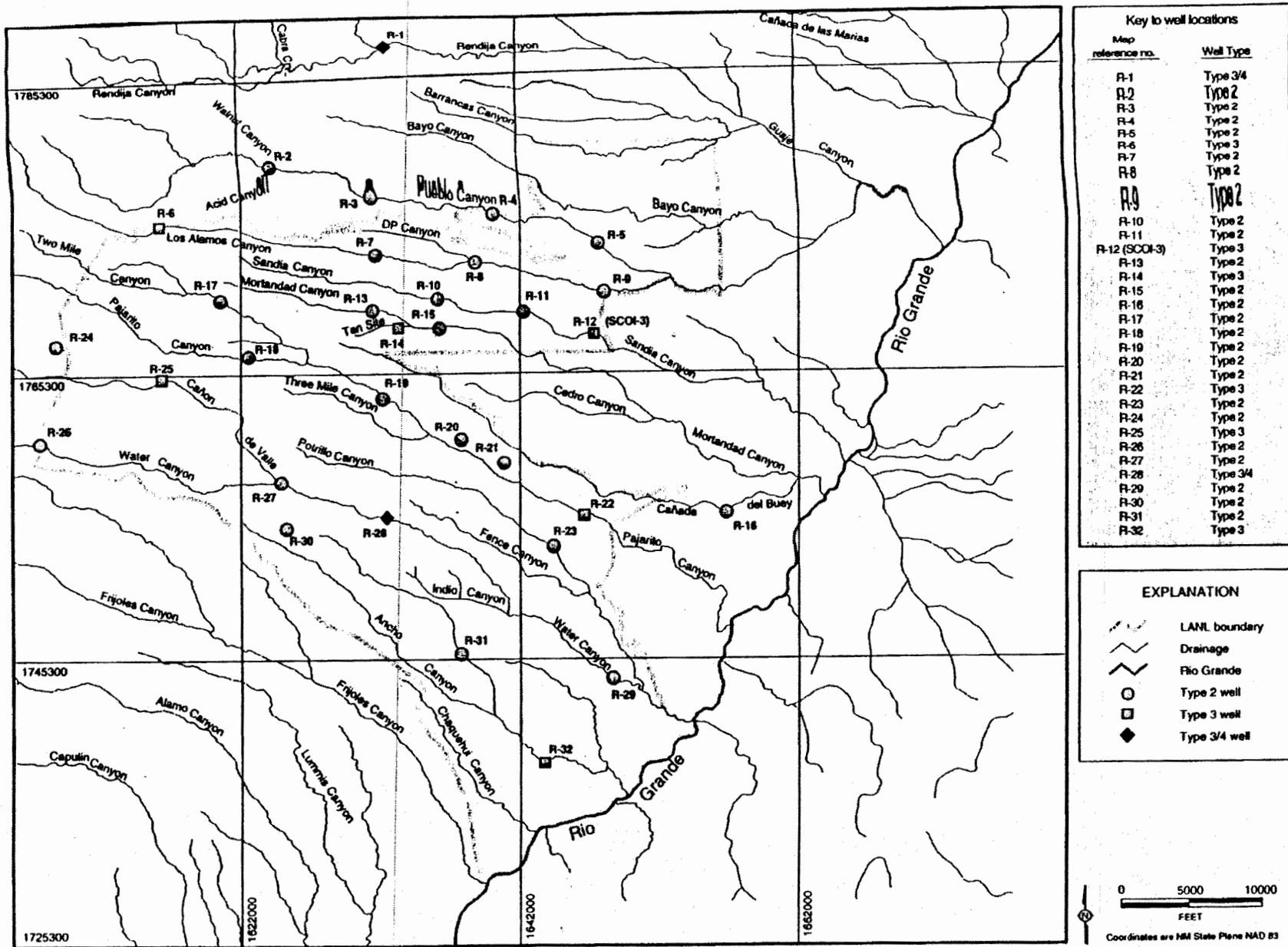


Figure 4-2. Proposed regional aquifer well locations.



*Risk Reduction & Environmental Stewardship Division  
Water Quality & Hydrology Group (RRES-WQH)*  
PO Box 1663, MS K497  
Los Alamos, New Mexico 87545  
(505) 667-7969/Fax: (505) 665-9344

Date: July 16, 2002  
Refer to: RRES-WQH: 02-273

Mr. Curt Frischkorn  
Pollution Prevention Section  
Ground Water Quality Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

**SUBJECT: NOTICE OF INTENT TO DISCHARGE, HYDROGEOLOGIC WORKPLAN WELLS**

Dear Mr. Frischkorn:

At our July 11, 2002, meeting at your Santa Fe office (Attendees: Mike Saladen (RRES-WQH), Roy Bohn (RRES-R), Bob Beers (RRES-WQH), John Young (NMED-HWB), and Curt Frischkorn (NMED-GWQB)), we reviewed the Notice of Intent to Discharge (NOI) submitted by Los Alamos National Laboratory to your agency on August 2, 2001, for the Hydrogeologic Workplan Wells. In addition to our general review of the NOI, we discussed the Laboratory's immediate need to discharge approximately 50,000 gallons of containerized drilling fluid from Hydrogeologic Workplan Well R-14. I have addressed both of these topics below.

It was my understanding from our July 11<sup>th</sup> meeting that both you and Mr. Young were satisfied with the Laboratory's NOI for the Hydrogeologic Workplan Wells with the exception of the NOI Decision Tree (Figure 1.0). Per your request, attached is a revised NOI Decision Tree that incorporates a reference to applicable RCRA regulatory limits' into the decision process. In addition, it was also my understanding that your agency would not require a ground water discharge plan for the discharge of drilling fluid, development water, and purge water from Hydrogeologic Workplan Wells as long as all discharges were compliant with the terms and conditions of the NOI.

In addition to our general discussions about the Hydrogeologic Workplan NOI, we discussed the discharge of approximately 50,000 gallons of containerized drilling fluid produced during the drilling of Hydrogeologic Workplan Well R-14. Per your request, please find the following enclosed water quality data and Material Safety Data Sheets (MSDSs) for the drilling fluid produced from R-14.

**Water Quality Data.** Attachment 1.0 contains water quality data (metals, general chemistry, SVOA, VOA, perchlorate, nitrate, and tritium) for the approximately 50,000 gallons of containerized drilling fluid produced during the drilling of R-14. It should be noted that the data table titled, "ER Water Samples" contains analytical results from two samples, GW14-02-46382 and GW14-02-46383, submitted for metals analysis. These samples were collected from the upper and lower portion of the storage tanks, respectively. Both samples were filtered prior to analysis.

The approximately 50,000 gallons of containerized drilling fluid from R-14 is compliant with New Mexico Water Quality Control Commission (NM WQCC) Regulation 3103 ground water standards with the exception of the following three contaminants:

Contaminant	Max. Result (mg/L)	Min. Result (mg/L)	WQCC ground water standard (mg/L)
Al	42.0	7.69	5.0
Fe	9.25	1.51	1.0
Mn	0.36	0.13	0.2

With the exception of acetone, no VOA or SVOA compounds were detected in R-14 drilling fluids. Acetone, detected at 1.6 mg/L, is present as a byproduct of the drilling additives. No perchlorate or tritium were detected in the R-14 drilling fluid at concentrations greater than analytical laboratory's Method Detection Limits (MDLs). Nitrate/nitrite (as N) was detected at 0.56 mg/L.

**MSDS Information.** Attachment 2.0 contains Material Safety Data Sheets (MSDSs) for the drilling fluid additives used in the top 1068 feet of the R-14 borehole including the formulation quantities for each product.

The Laboratory requests your agency's permission to discharge the approximately 50,000 gallons of drilling fluid from R-14 in accordance with the August 2, 2001, NOI. Please call me at (505) 667-6969 or Roy Bohn of the Laboratory's Environmental Restoration Project (RRES-R) at (505) 665-5138 if additional information is required.

Sincerely,



Bob Beers  
Water Quality & Hydrology Group

BB/am

Attachments: a/s

Cy: M. Leavitt, NMED/GWQB, Santa Fe, New Mexico, w/att.  
J. Davis, NMED/SWQB, Santa Fe, New Mexico, w/att.  
J. Bearzi, NMED/HWB, Santa Fe, New Mexico, w/att.  
J. Young, NMED/HWB, Santa Fe, New Mexico, w/att.  
J. Vozella, DOE/OLASO, w/att., MS A316  
G. Turner, DOE/OLASO, w/att., MS A316  
B. Stine, ADO, w/att., MS A104  
B. Ramsey, RRES-DO, w/o att., MS J591  
K. Hargis, RRES-DO, w/o att., MS J591  
D. Stavert, RRES-EP, w/att., MS J978  
S. Rae, RRES-WQH, w/att., MS K497  
C. Nylander, RRES-DO, w/att., MS K497  
D. Rogers, RRES-WQH, w/o att., MS K497  
M. Saladen, RRES-WQH, w/att., MS K497  
R. Bohn, RRES-R, w/att., MS M992  
D. McInroy, RRES-R, w/o att., MS M992  
RRES-WQH File, w/att., MS K497  
IM-5, w/att., MS A150

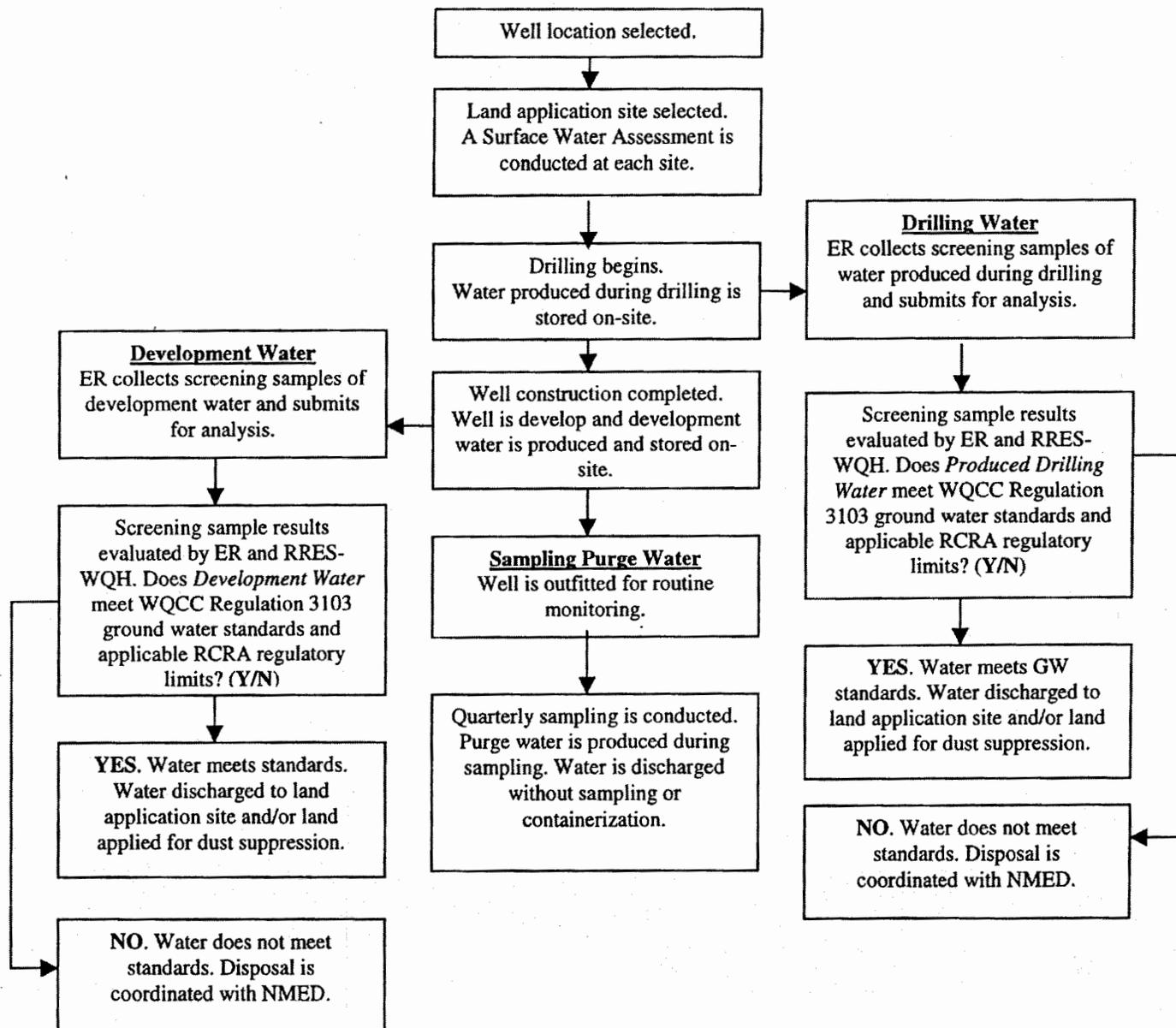


Figure 1.0. Workplan NOI Decision Tree



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**

Ground Water Quality Bureau  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2918 phone  
(505) 827-2965 fax



PETER MAGGIORE  
Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 7, 2002

Steven Rae, Group Leader  
Water Quality & Hydrology Group  
Los Alamos National Laboratory  
P.O. Box 1663, MS K497  
RRES-WQH: 02-273  
Los Alamos, New Mexico 87545

**RE: Response to Notice of Intent to Discharge for Los Alamos National Laboratory's Hydrogeologic Workplan Wells**

Dear Mr. Rae:

The New Mexico Environment Department (NMED), Ground Water Quality Bureau (GWQB) has reviewed your notices of intent, dated July 16, 2002, and August 2, 2001, for the discharge of up to 96,000 gallons per day (gpd) of drilling and development water, and 1,500 gpd of sampling purge water from 23 regional aquifer wells described under Los Alamos National Laboratory's Hydrogeologic Workplan. The wells will be drilled at various locations throughout T18N, T19N, R5E, R6E, and R7E, Los Alamos County. The notices of intent satisfy the requirements of Section 20.6.2.1201 NMAC of the Water Quality Control Commission (WQCC) Regulations.

Based on the presently available information in your notices of intent, a discharge plan is not being required for this discharge as long as the discharge is as described in the notices of intent. The decision to discharge must follow the guidelines specified in the Workplan NOI Decision Tree (Figure 1, Revised 07/15/02). The Ground Water Quality Bureau has concluded that if the guidelines specified in the NOI are met, then the proposed discharge will not adversely impact ground water, and a discharge plan will not be required. However, if the results of the analysis of drilling water, development water, or sampling purge water exceed the Section 20.6.2.3103 NMAC WQCC ground water standards or applicable RCRA regulatory limits, then disposal must be coordinated with NMED on a site specific basis.

The exempt discharge is briefly described as follows: A maximum of 96,000 gpd of drilling water and development water, and a maximum of 1,500 gpd of sampling purge water from 23 regional aquifer wells will be land applied with a portable sprinkler system, or applied to the access roads and

Steven Rae  
August 7, 2002  
Page 2

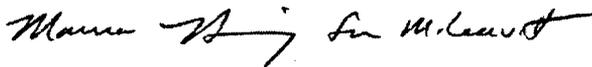
well site for dust suppression. Prior to discharge, the drilling water and development water will be sampled and analyzed to determine compliance with Section 20.6.2.3103 NMAC WQCC ground water standards and applicable RCRA regulatory limits.

Although a discharge plan is not being required for this discharge at this time, you are not relieved of liability should your operation result in actual pollution of surface or ground waters. Further, this decision by the NMED does not relieve you of your responsibility to comply with any other applicable federal, state, and/or local laws and regulations, such as zoning requirements, plumbing codes and nuisance ordinances.

If at some time in the future you intend to change the amount, the character, the screening process, or the location of your discharge so that it will not be as described, or if observation or monitoring shows that the discharge is not as described, you must file a new notice of intent with the Ground Water Pollution Prevention Section (GWPPS).

If you have any questions, please contact either Curt Frischkorn of the GWPPS staff at 827-0078 or Maura Hanning, Program Manager of the GWPPS at 827-2945.

Sincerely,



Marcy Leavitt, Chief  
Ground Water Quality Bureau

ML:CSF/csf

xc: Bob Beers, Water Quality and Hydrology Group, Los Alamos National Laboratory, P.O. Box 1663, MS K497, RRES-WQH: 02-273, Los Alamos, New Mexico 87545  
Courte Voorhees, District Manager, NMED District II  
John Young, Hazardous Waste Bureau, NMED, P.O. Box 26110, Santa Fe, NM 87502  
NOI File