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February 16, 1996

Elizabeth Withers
LAAO NEPA Compliance Officer
Los Alamos Area Office
528 35th Street
MS-A316
Los Alamos, N.M. 87544

Dear Ms. Withers:

RE: PRE-DECISIONAL DRAFT; ENVIRONMENTAL ASSESSMENT: PROPOSED CMR BUILDING UPGRADES (DOE\EA-1101); LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, N.M.; PREPARED BY U.S. DEPARTMENT OF ENERGY, JANUARY 1996

The following transmits New Mexico Environment Department (NMED) staff comments concerning the above-mentioned Draft Environmental Assessment (DEA). The comments relate principally to a number of questions NMED staff have regarding impacts on surface and ground water quality.

1. Pages 15-16, Section 2.2.1.3:

Will the installation of the proposed central chilled water plant require an amendment for increased discharge to a currently permitted NPDES outfall, the addition of a new NPDES outfall to the current permit, or will this system have no discharge of cooling water to the environment?

2. Page 17, Section 2.2.1.7:

See comment 1, above.

3. Page 18, Section 2.2.1.9:

It is unclear whether these acid vents and drains are connected to underground piping. If so, are contingency plans in place to mitigate contamination to the environment during excavation? If contamination of the environment is found due to previously unknown leaks of this piping, what actions will be taken to mitigate movement of contamination by surface transport or infiltration into the soil/rock profile and, possibly, ground water?



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4. Page 18, Section 2.2.1.10:

Have provisions been made to contain the water that will be drained from the current fire protection system, will the potential exist for this water to become contaminated, and what will be its final disposition? Will a general Notice of Intent (NOI) to discharge be filed with the proper regulatory authority pursuant to the State of New Mexico Water Quality Control Commission (WQCC) regulation 1-201 both before and after upgrades are performed? Again, what will be the final disposition of the water released after upgrades are completed and testing of the system is performed, and is there any possibility for contamination of this water?

5. Page 19, Section 2.2.1.12:

What will be the tank and associated equipment containment requirements in the event of a spill or other release of contaminated washdown effluent?

6. Page 30, Section 3.5:

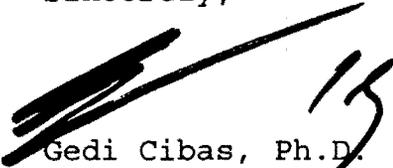
To where were sediments removed in the 1992 sediment traps cleanup? Where will they be placed after the traps fill again?

7. General Comment:

As stated, outside construction, including excavations, will be necessary during this upgrade. The possibility exists that the excavation material may contain Contaminants of Concern (COC's). Is a storm water pollution prevention plan in place for this construction activity in order to mitigate the transport of contaminants, including storm water drainages at the CMR complex and the destination of these drainages?

We appreciate the opportunity to comment on this document. Please let me know if you have any questions.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 965ER