



State of New Mexico
ENVIRONMENT DEPARTMENT

Ground Water Quality Bureau

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1190 St. Francis Drive, P.O. Box 26110

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TA-15
PHEMEX
(R-306 Firing Site)

BILL RICHARDSON
GOVERNOR

RON CURRY
SECRETARY
DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 2, 2003

Steven R. Rae, Group Leader
Water Quality and Hydrology Group
Risk Reduction and Environmental Stewardship Division
Los Alamos National Laboratory
P.O. Box 1663, MS K497
(RRES-ECR)
Los Alamos, New Mexico 87545



**RE: Response to Notice of Intent to Discharge for Los Alamos National Laboratory
R-306 Firing Site Water/Foam Mixture**

Dear Mr. Rae:

The New Mexico Environment Department (NMED), Ground Water Quality Bureau (GWQB) has reviewed your notice of intent dated June 30, 2003, for the discharge of an AFC-380 foam/water mixture at the Los Alamos National Laboratory (LANL) R-306 firing site. The R-306 firing site is located approximately 2 miles south of Los Alamos, in projected Section 27, T19N, R6E, Los Alamos County. The notice of intent satisfies the requirements of Section 20.6.2.1201 NMAC of the Water Quality Control Commission (WQCC) Regulations.

Based on the information submitted with your notice of intent, a discharge permit is not being required for this discharge as long as the discharge is as described in the notice of intent referenced above. The Ground Water Quality Bureau has concluded that the proposed discharge will not adversely impact ground water, and a discharge plan will not be required.

The exempt discharge is briefly described as follows: Water will be mixed with the AFC-380 concentrate at the firing point to generate a mixture consisting of 94% water and 6% AFC-380 concentrate. Approximately 500 gallons of the water/foam mixture will be used for one experiment. The water/foam mixture will be used to capture and control fugitive dusts and potential aerosolized shot contaminants from being discharged into the environment. Following the experiment, the water/foam mixture will be collected in a synthetically lined foam collection system, followed by pretreatment in an activated carbon filtration system. The pretreated foam will then be transferred to the Radioactive Liquid Waste Treatment Facility at TA-50 (currently regulated under pending Ground Water Discharge



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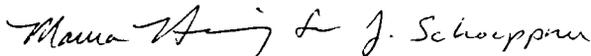
Permit DP-1132) for further treatment prior to being discharged. Ground water below the site is at a depth of approximately 755 feet, with a total dissolved solids concentration of approximately 165 milligrams per liter.

Although a discharge permit 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, 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,



Jerry Schoeppner, Chief
Ground Water Quality Bureau

JS:CSF/csf

xc: Mark Haagenstad, Water Quality and Hydrology Group, Los Alamos National Laboratory,
P.O. Box 1663, MS K497, RRES-WQH, Los Alamos, NM 87545
Courte Voorhees, District Manager, NMED District II
John Young, NMED Hazardous Waste Bureau, P.O. Box 26110, Santa Fe, NM 87502
Bret Lucas, NMED Surface Water Quality Bureau
NOI File