

16

ENTERED



NEW MEXICO
ENVIRONMENT DEPARTMENT



SUSANA MARTINEZ
Governor

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, New Mexico 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965

RYAN FLYNN
Cabinet Secretary

JOHN A. SANCHEZ
Lieutenant Governor

www.env.nm.gov

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 3, 2015

Mr. Gene Turner, DOE/AIP/POC
U.S. Department of Energy
Los Alamos Site Office, MS A316
3747 West Jemez Road
Los Alamos, NM 87544

Ms. Alison Dorries, ENV Division Director
Los Alamos National Security, LLC
Los Alamos National Laboratory
P.O. Box 1663, MS K404
Los Alamos, NM 87544

RE: Response to Notice of Intent to Discharge; Discharge Permit Not Required to Add Tracer to Ground Water at Technical Area (TA) 16, AI:856 (PRD20150011)

Dear Mr. Turner and Ms. Dorries:

The New Mexico Environment Department (NMED) received a Notice of Intent on August 6, 2015 to deploy naphthalene disulfonate (NDS) and Sodium Chloride (salt) to surface water locations at Cañon de Valle between Burning Ground Spring and gaging station E0256. The notice satisfies the requirements of Subsection A of 20.6.2.1201 NMAC of the New Mexico Water Quality Control Commission (WQCC) Regulations (20.6.2 NMAC). The proposed discharges are located at the Los Alamos National Laboratory TA-60 in Sections 29 and 30, Township 19N, Range 06E, Los Alamos County.

The proposed/exempt discharge is briefly described as follows:

Fifty kilograms of NDS dissolved in approximately 12,000 gallons of potable water will be deployed in the flowing reach of Cañon de Valle near Burning Ground Spring. The deployment area will be flushed with 1,000 to 2,000 gallons of potable water after NDS deployment. One hundred grams of salt dissolved in approximately one liter of potable water will be deployed at three locations in the flowing reach of Cañon de Valle between Burning Ground Spring and gaging station E0256. Anticipated recovery of the NDS is expected to be <2%.



September 3, 2015

Page 2

Based on the information provided in the NOI, NMED has determined that a Discharge Permit is not required as long as the discharge is as described. A Discharge Permit is not required at this time because the information provided indicates it is unlikely that the discharge will adversely affect groundwater quality.

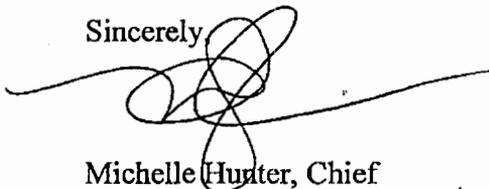
However, because the information provided indicates that the discharge will occur to a watercourse, you are encouraged to contact NMED Surface Water Quality Bureau at (505) 827-2795 and the U.S. Environmental Protection Agency in Dallas at (214) 665-3152 to determine whether your discharge may require a National Pollutant Discharge Elimination (NPDES) permit.

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

If at some time in the future you intend to change the amount, character, or location of your discharge, or if observation or monitoring shows that the discharge is not as described in your Notice of Intent, you must file a revised Notice of Intent with the Ground Water Quality Bureau.

If you have any questions, please contact Steven Huddleson, Program Manager of the Ground Water Pollution Prevention Section, at (505) 827-2936.

Sincerely,



Michelle Hunter, Chief
Ground Water Quality Bureau

MH:GK

enc: Notice of Intent received August 6, 2015
Additional information received August 24, 2015

cc: Robert Italiano, District Manager, NMED District II (electronic copy w/ enclosure)
Steven Huddleson, NMED GWQB (electronic copy)
Greg Huey, NMED GWQB (electronic copy)
Gerald Knutson, NMED GWQB (electronic copy)
NMED Santa Fe Field Office (electronic copy w/ enclosure)
NOI File
County File
James Hogan, NMED SWQB (electronic copy)
Sarah Holcomb, NMED SWQB (electronic copy)
Erin Trujillo, NMED SWQB (electronic copy)

Mr. Turner and Ms. Dorries, AI:856 (PRD20150011)

September 3, 2015

Page 3

John Kieling, NMED HWB (electronic copy)

Steven Yanicak, NMED-DOE-Oversight Bureau (electronic copy)

Michael T. Brandt, ADESH, mtbrandt@lanl.gov (electronic copy)

Michael Saladen ENV-CP, saladen@lanl.gov (electronic copy)

Robert Beers, bbeers@lanl.gov (electronic copy)