

FILE HSWA LANL TA-16-021(c)



GARY E. JOHNSON
GOVERNOR

State of New Mexico
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November 1, 1996

Mr. Steven R. Rae
Group Leader, ESH-18
Water Quality and Hydrology Group
Los Alamos National Laboratory
Los Alamos, New Mexico 87544

RE: Los Alamos National Laboratory (LANL), Notice of Intent (NOI) to Discharge at (PRS) 16-021(c)

Dear Mr. Rae:

The Surface Water Quality Bureau (SWQB) of the New Mexico Environment Department received the above referenced document on October 30, 1996.

SWQB staff have reviewed this document and provides the following comment:

1. Item # 3 of the NOI indicates that the discharge to the PRS would drain into an ephemeral tributary to Valle Canyon (in a segment currently under study by the U. S. Fish and Wildlife Service). SWQB believes that this activity is not covered by the National Pollutant Discharge Elimination System (NPDES) permit. LANL is therefore requested to contact the Region VI Environmental Protection Agency (EPA) office for a permit.
2. Item # 6 "total amount discharged" refers to maximum gallons to be discharged during any day of sampling activities but does not indicate how many days of activity/discharge this entails. SWQB would like to know for how many days this activity is proposed.
3. SWQB noted that the Hazardous and Radioactive Material Bureau was not copied on this report. Since the activity is at a RCRA site, SWQB has forwarded a copy to HRMB.

Why is not NPDES?
Barbara

It is my understanding that a response from the Ground Water Protection and Remediation Bureau will be sent to LANL under separate cover. If you have any questions concerning SWQB's comments, please contact me or Barbara Hoditschek at (505) 827-2827.

Sincerely,

Glenn E. Saums
Health Program Manager
Point Source Regulation Section

cc: Marcy Leavitt, NMED, GWPRB
Benito J. Garcia, NMED, HRMB
Neil Weber, NMED, DOEOB
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