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ENVIRONMENT DEPARTMENT  
Hazardous & Radioactive Materials Bureau  
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PETER MAGGIORE  
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 1998

Mr. G. Thomas Todd, Area Manager  
Department of Energy  
Los Alamos Area Office  
528 35th Street, Mail Stop A316  
Los Alamos, New Mexico 87544

Dr. John Browne, Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545

Dear Mr. Todd and Dr. Browne:

**RE: Request for Explanation of Process, High Explosives  
Wastewater Treatment Facility (WWTF); Technical Area 16  
EPA I.D. No. NM 089 001 0515**

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has received DOE/LANL's (LANL) response to HRMB's June 17, 1998 Request for Supplemental Information (RSI). HRMB requires this information because LANL has presented inconsistent scenarios for the management of wastewaters entering the WWTF. The conflicting information presented in these scenarios has made a decision on the regulatory status of the WWTF difficult for HRMB. Because the confusion is due to a lack of clear description of all processes involving all waste streams from the point of generation to the treatment endpoint, and not statutory citation, LANL's response to the RSI that reiterated the regulatory WWTF exemptions is inadequate.

In order to resolve the issue of the regulatory status of the WWTF, LANL must submit a detailed systematic explanation of the management and disposition of all waste streams. The explanation should start at or near the point where all waste streams enter the sumps in which they are collected, and continue up to the wastewater treatment endpoint, including the wastewater which flows through the sand filters. The explanation should include but not be limited to: screen size, physical and/or chemical processes, filter descriptions, whether or not any chemicals are

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added to the waste streams, and any reintroduction of separated materials. LANL should provide any applicable diagrams sampling results, sampling points, schedules, parameters (e.g. TSS, TOC, VOC etc.), of any/all waste streams, including waste from baskets or any devices used to separate solids from waste streams. Indicate if sampling is performed before or after filtering through the baskets; if the waste stream is constant or if it changes; if so, provide information on how often the waste stream changes and detail the changes in composition. LANL shall also include the Waste Acceptance Criteria for the WWTF.

LANL is required to respond within thirty (30) calendar days of receipt of this letter. If the receipt is not signed, LANL will respond within thirty (30) calendar days of the date of this letter.

If there are any questions please feel free to contact Mr. John Kieling, HRMB's LANL Facility Manager at (505) 827-1558.

Sincerely,



Benito J. Garcia, Chief, HRMB

BJG/mjc

cc: John Tymkowich, Manager, RCRA IE  
John Kieling, LANL Facility Manager  
Michael Chacón, HRMB  
Jim Davis, NMED SWQB  
Marcy Leavitt, NMED GWQB  
Steve Yanicak, NMED DOE OB  
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Track: LANL, doc.date, NA, DOE/LANL, RPMP/Garcia, RE, File

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