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ENTERED



NEW MEXICO
ENVIRONMENT DEPARTMENT



SUSANA MARTINEZ
Governor

Ground Water Quality Bureau
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Cabinet Secretary

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Lieutenant Governor

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J.C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

February 8, 2018

Taunia Van Valkenburg, Group Leader
Environmental Protection and Compliance Division (EPC-DO)
Los Alamos National Laboratory
P.O. Box 1663, K490
Los Alamos, NM 87545

RE: Response to Notice of Intent to Discharge; Discharge Permit Not Required for a Fire Suppression Foam Discharge northwest of Technical Area 36 Structure 12, AI:856 (PRD20180001)

Dear Ms. Van Valkenburg:

The New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) received a Notice of Intent on February 1, 2018 for a discharge of up to 6,600 gallons of potable water and 66 gallons of Phos-Chek WD881A Class A Foam Concentrate (fire suppression foam). The discharge is to minimize the potential of a wildland fire from an experiment northwest of TA-36-12. 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 discharge is located northwest of TA-36-12 at 35° 42' N, -106° 15' 17' W, approximately 4.6 miles southeast of Los Alamos in Section 36, Township 19N, Range 06E, Los Alamos County.

Based on the information and materials provided in the Notice of Intent, NMED GWQB has determined that a Discharge Permit is not required as long as the discharge occurs as described. A Discharge Permit is not required at this time because the information provided indicates the fire suppression foam mixture is unlikely to move directly or indirectly into groundwater.

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.



Taunia Van Valkenburg, AI:856 (PRD20180001)

February 8, 2018

Page 2

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, 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 either Gerald Knutson at (505) 827-2996 or Steve Pullen, Program Manager, at (505) 827-2962.

Sincerely,



Michelle Hunter, Chief
Ground Water Quality Bureau

MH:GK

enc: Notice of Intent received February 1, 2018

cc: Robert Italiano, District Manager, NMED District II
Steve Pullen, NMED GWQB
Gerald Knutson, NMED GWQB
NOI File
County File
Shelly Lemon, NMED SWQB
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