



BILL RICHARDSON
Governor
DIANE DENISH
Lieutenant Governor

TA39
NEW MEXICO
ENVIRONMENT DEPARTMENT
Ground Water Quality Bureau

Harold Runnels Building
1190 St. Francis Drive
PO Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965
www.nmenv.state.nm.us



RON CURRY
Secretary
SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 31, 2010

Anthony R. Grieggs, Group Leader
Environmental Protection Division
Water Quality & RCRA (ENV-RCRA)
P.O. Box 1663, Mail Stop K490
Los Alamos, NM 87545

RE: Response to Notice of Intent to Discharge; Discharge Permit Not Required for Fire Protection Tank Discharge at TA-39, AI:856 (PRD20100001)

Dear Mr. Grieggs:

The New Mexico Environment Department (NMED) received a Notice of Intent on February 26, 2010 (copy enclosed) for the one-time land application of approximately 20,000 gallons of de-chlorinated potable water from a fire protection tank. 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 in Technical Area (TA) 39 at 35°47'36.54" north latitude, 106°16'10.60" west longitude, Los Alamos National Laboratory, Los Alamos County.

Based on the information provided in your Notice of Intent, 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 ground water quality.

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 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. Please be advised that you should consult with the NMED Surface Water Quality Bureau on the need for an NPDES Permit related to the discharge.

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Anthony R. Grieggs, AI:856 (PRD20100001)

March 31, 2010

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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 Jennifer Fullam at (505) 827-2909 or George Schuman, Program Manager of the Ground Water Pollution Prevention Section, at (505) 827-2945.

Sincerely,



William C. Olson, Chief
Ground Water Quality Bureau

WO:JF

Enc: Notice of Intent, dated February 26, 2010

cc: Robert Italiano, District Manager, NMED District II (w/ enc)
NMED Santa Fe Field Office(w/ enc)
NOI File(w/ enc)
County File (w/ enc)
Glenn Saums, NMED SWQB(w/ enc)
Richard Powell, NMED SWQB (w/o enc)
James Bearzi, NMED HWB(w/ enc)
Steven Yanicak, NMED-DOE-Oversight Bureau (w/o enc)
Erik Galloway, NMED-DOE-Oversight Bureau (w/ enc)
Gene Turner, LASO-EO, Los Alamos National Laboratory, A316, Los Alamos, NM
87545 (w/o enc)
Michael B. Mallory, PADOPS, Los Alamos National Laboratory, A102, Los Alamos,
NM 87545 (w/o enc)
Chris Cantwell, ADESHQ, Los Alamos National Laboratory, K491, Los Alamos, NM
87545 (w/o enc)
Michael Saladen ENV-RCRA, Los Alamos National Laboratory, K490, Los Alamos,
NM 87545 (w/o enc)
Jacob Meadows, ENV-RCRA, Los Alamos National Laboratory, K490, Los Alamos,
NM 87545 (w/o enc)
Mark Haagenstad, ENV-RCRA, Los Alamos National Laboratory, K490, Los
Alamos, NM 87545 (w/o enc)
Charles Barnett, UI-DO, Los Alamos National Laboratory, J972, Los Alamos, NM
87545 (w/o enc)
Bob Beers, ENV-RCRA, Los Alamos National Laboratory, MS K497, Los Alamos,
NM 87545 (w/o enc)



GROUND WATER

MAR 02 2010

BUREAU

Environmental Protection Division
Water Quality & RCRA Group (ENV-RCRA)
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: February 26, 2010
Refer To: ENV-RCRA-10-043
LA-UR: 10-01148

Mr. William C. Olson, Chief
Ground Water Protection Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2250
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502

Mr. Glenn Saums
Surface Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2050
1190 St. Francis Drive
P.O. Box 5469
Santa Fe, New Mexico 87502-5469

**SUBJECT: POTABLE WATER DISCHARGE FROM FIRE PROTECTION WATER
TANK AT TECHNICAL AREA (TA) 39 LOS ALAMOS NATIONAL
LABORATORY**

Dear Mr. Olson and Mr. Saums:

On February 26, 2010, Laboratory ENV-RCRA personnel contacted New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) personnel concerning a proposed potable water discharge from a fire protection water tank located at Technical Area (TA) 39 at Los Alamos National Laboratory. Based on recommendations from NMED-SWQB personnel, enclosed is a Notice of Intent to Discharge (NOI) that has been prepared for submittal to the NMED pursuant to 20.6.2.1201 NMAC of the New Mexico Water Quality Control Commission (NMWQCC) Regulations and the Los Alamos National Laboratory (LANL) Liquid Discharge Reporting Guidance (Decision Tree), dated March 10, 2009.

Laboratory Utilities personnel have identified issues with level sensor mechanisms on the tank. Partial drainage of the tank is required to ensure high-level alarms properly function. High-level alarms provide notification to personnel in the event that overflows occur from the tank. Laboratory personnel have not witnessed any overflows from the tank due to this issue. The proposed discharge will be conducted to minimize environmental impacts.

Please contact Jacob Meadows at (505) 606-0185, or Mike Saladen at (505) 665-6085 of the Water Quality and RCRA Group (ENV-RCRA) if you have questions.

Sincerely,

Anthony R. Grieggs
Group Leader
Water Quality & RCRA Group

ARG:JM/lm

Enclosure: a/s

Cy: Robert George, NMED/GWQB, Santa Fe, NM, w/enc.
Jennifer Fullam, NMED/GWQB, Santa Fe, NM, w/enc.
Richard Powell, NMED/SWQB, Santa Fe, NM, w/enc.
Steven Yanicak, LASO-GOV, w/enc., M894
Gene Turner, LASO-EO, w/enc., A316
Michael B. Mallory, PADOPS, w/o enc., A102
J. Chris Cantwell, ADESHQ, w/o enc., K491
Michael Saladen, ENV-RCRA, w/o enc., K490
Jacob Meadows, ENV-RCRA, w/enc., K490
Mark Haagenstad, ENV-RCRA, w/enc., K490
Charles Barnett, UI-DO, w. enc., J972
ENV-RCRA File, w/enc., K490
IRM-RMMSO, w/enc., A150

NOTICE OF INTENT

GROUND WATER

- 1. Name and address of facility making the discharge.

MAR 02 2010

Los Alamos National Laboratory
P.O. Box 1663
Los Alamos, New Mexico 87545

BUREAU

- 2. Location of the discharge (In Township, Range and Section, if available).

TA-39 Fire Protection Potable Water Tank
Los Alamos National Laboratory
Los Alamos, NM, 87545
Latitude: 35° 47' 36.54" N, Longitude: -106° 16' 10.60" W

- 3. The means of discharge. (To lagoon, Flowing stream, Water course, Arroyo, Septic tank, other).

Potable water will be discharged from a fire protection tank that has recently undergone repairs. A controlled, one-time discharge is proposed to prevent the water from becoming an uncontrolled discharge. The water will be pumped from the tank and de-chlorinated at the discharge location. The water will be discharged at a slow flow-rate and monitored to minimize erosion impacts. Existing BMPs at the site will help minimize the potential erosion impacts. The water may enter the Ancho Canyon watercourse. From a review of the area there are no expected impacts to SWMUs or AOCs.

- 4. The estimated concentration of contaminants (if any) in the discharge.

De-chlorinated potable water.

- 5. The type of operation from which the discharge is derived.

Laboratory staff have completed repairs to water level detection equipment associated with a potable water fire protection tank at TA-39 on the north side of NM State Road 4. When the tank was put back in service following repairs, the water was above both the high level and high-high level alarms. An estimated 20,000 gallons of water may need to be discharged to ensure high-level alarms in the tank function properly. The alarms provide notification to LANL personnel in the event of overflows within the tank. Discharging the water at a controlled rate through BMPs is a preventive measure proposed to allow the high-level alarms to function properly.

To prevent an overflow from the tank, the Laboratory proposes completing the discharge as soon as possible.

- 6. The estimated flow to be discharged per day.

This is a one-time proposed discharge with a maximum volume of 20,000 gallons which will be discharged over the course of one day.

- 7. The estimated depth to Ground-Water (if available).

Greater than 1,000 ft.

Signed:

[Handwritten signature of Anthony R. Grieggs]

Date:

2/26/10

Anthony R. Grieggs, Group Leader
Environmental Protection Division
Water Quality and RCRA Group