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**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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January 29, 2016

Alison M. Dorries, Division Leader
Environmental Protection Division
Los Alamos National Laboratory
P.O. Box 1663 MS K490
Los Alamos, New Mexico 87545-0001

RE: Comments on 60% Design Plans and Specifications Radioactive Liquid Waste Treatment Facility - Upgrade Project Transuranic Liquid Waste Project, DP-1132

Dear Ms. Dorries:

The New Mexico Environment Department, Ground Water Quality Bureau (GWQB) has received from the Department of Energy and Los Alamos National Security LLC (DOE/LANS) design documents for the Radioactive Liquid Waste Treatment Facility Upgrade Project (RLWTF UP) including:

- 60% design plans and specifications for the RLWTF UP at Technical Area (TA)-50, including supplemental information to discharge permit application DP-1132.

The DOE/LANS has requested comments from GWQB on the referenced plans and specifications. GWQB has reviewed the 60% plans and specifications for compliance with basic elements necessary for protection of groundwater quality. GWQB makes no comment regarding the design adequacy, compliance with applicable State, Federal, and local statute, code and requirements.

The review confirms that the design, construction specifications, proposed systems and calculations are generally appropriate, and include adequate safeguards to protect groundwater quality including secondary containment for in-service drums of ferric chloride, and structural integrity of sanitary sewer lines and their connections to manholes. While not a concern for ground water, the GWQB notes that the water quality acute criterion for chlorine in surface water is 19 ug/L, which needs to be taken into account if chlorinated water from disinfecting water

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Alison M. Dorries, DP-1132, Comments on 60% Design Plans and Specifications Radioactive
Liquid Waste Treatment Facility

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supply pipe is discharged to a surface water. Also, in Section 22 0816, 3.4 D, the word
"chloride" should be "chlorine".

As a sealed engineering document, GWQB relies on the design engineer for the efficacy of the
design to meet permit requirements. GWQB similarly relies on DOE/LANS to provide adequate
construction oversight to ensure conformance with the design specifications. Construction of the
facility prior to issuance of the final approved Discharge Permit will proceed at DOE/LANS own
risk, should DOE/LANS decide to proceed with construction before GWQB issues the final
permit.

The GWQB appreciates the opportunity to provide these comments on the proposed RLWTF
Upgrade Project. Please contact me or Steven Huddleson at (505) 827-2936 if you have any
questions.

Sincerely,



Michelle Hunter, Chief
Ground Water Quality Bureau

cc: Gene E. Turner, Los Alamos National Laboratory, P.O. Box 1663 MS K490
Los Alamos, New Mexico 87545-0001
John Kieling, Hazardous Waste Bureau (electronic copy)
Jim Chiasson, Construction Programs Bureau (electronic copy)
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