



Department of Energy  
Albuquerque Operations  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

3-30-88

TA 50

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Fred Humke, (6W)  
U. S. Environmental Protection Agency  
Region VI  
Allied Bank Tower at Fountain Place  
1445 Ross Avenue  
Dallas, TX 75202

Dear Mr. Humke:

NPDES PERMIT NO. NM0028355 FOR LOS ALAMOS NATIONAL LABORATORY

The National Pollutant Discharge Elimination System (NPDES) Permit No. NM0028355 for Los Alamos National Laboratory (Laboratory) requires the permittee to notify the Environmental Protection Agency (EPA) regarding any physical alterations or additions to the permitted facility that could significantly change the nature or increase the quantity of pollutants discharged. By this letter, the Department of Energy (DOE), Los Alamos Area Office (LAAO), is transmitting information regarding specific permitted outfalls at the Laboratory that may be of interest to EPA, but which is not deemed to indicate a significant change in the nature or increase the quantity of pollutants discharged.

I have enclosed a flow chart of minor contributors to the industrial waste collection system connected to the wastewater treatment plant at Technical Area (TA) 50, (NPDES Outfall 051). This flow chart updates the chart contained in the March 1986 Consolidated Permit Application for the Laboratory's NPDES permit. Please note that the new chart (lower lefthand quadrant) includes the Controlled Air Incinerator (CAI) and the Chemical Batch Treatment Plant (CBTP) as contributing sources of influent to the TA-50 treatment plant. These intermittent sources were indicated on the old flow chart as R & D and waste treatment. However, both contributing sources are now capable of contributing influent on a routine operational basis, although neither influent source has yet to begin routine Resource Conservation and Recovery Act (RCRA) hazardous waste operations.

For your information, I have also enclosed a listing from the Laboratory's Hazardous Waste Permit Application, Part A, regarding the code list of wastes that can be incinerated in the CAI, and key to the codes for the various chemicals. Additionally, I have enclosed a copy of Section 4.0 (pages 4-1 thru 4-13) from the Hazardous Waste Permit Application, Part B, that includes descriptive text regarding the CAI (Chemical Waste Incinerator) and the CBTP (TA-50 Batch Treatment System) for your information. Again, I do not anticipate that either influent source will

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significantly change the quantity or quality of effluent discharged from the TA-50 wastewater treatment plant (Outfall 051). My intent is to clarify that both these influent sources are connected to the TA-50 treatment plant.

It has come to my attention that our modified NPDES permit, reissued May 29, 1987, after the addition of two new outfalls, was inadvertently changed regarding Outfall 09S. This sanitary wastewater outfall from the stabilization lagoons at TA-53 has historically had total suspended solids (TSS) effluent limitations that allowed 90 mg/l for the daily maximum. Evidently, the modification process in May changed the limitation to 45 mg/l. I would appreciate your attention to this change, in that the 90 mg/l limitation is more appropriate for a lagoon discharge.

From time to time, New Mexico Environmental Improvement Division (EID) personnel have made inquiries as to the methods used by the Laboratory in preparing the 1986 Consolidated Permit Application. Specifically, EID has asked how the permit applications were completed for those six categorical wastewater discharges, where special sampling was conducted, and samples analyzed for the 129 priority pollutants. Since the application procedures were negotiated with you, I felt that a brief review of that procedure in this letter would clarify things for EID.

Because the Laboratory's NPDES permit is written with categories of similar wastewater discharges, and similar outfalls are grouped in those categories, a representative outfall from six categories was selected for sampling and analysis for all of the constituents listed in the EPA Form 2C Part V (basically the 129 priority pollutants). The six outfalls selected for the special sampling were the most representative of the wastewater category. They typically represented the categorical outfall with the highest volume discharge, and a recent history of permit non-compliance. The selected outfalls were sampled in January 1986 and all of the parameters listed on EPA Form 2C Part V were analyzed (except for a few parameters which were either deemed to be not present [e.g., color, oil and grease, fecal coliform], or were not analyzed for lack of laboratory equipment). All of the analytical data was reported on EPA Form 2C, and then the boxes located next to the reported data were checked, indicating the presence or absence of the chemical, depending on the quantity of the reported analyses. Therefore, a judgment was made as to whether the chemical parameter was present or absent based on an analysis for that particular chemical and not based on an assumption. All gas chromatography/mass spectrometry (GC/MS) fractions were sampled and reported under Part C, EPA Form 2C (if the maximum daily value box was left blank, the analysis for the compound was zero or less than minimum detection limit). These analyses, although not required due to the fact that the Laboratory is not a primary industry, were performed to assist EPA in drafting a comprehensive NPDES permit.

As you are aware, the geographical location of the Laboratory has influenced the location of Technical Areas, and the requisite sanitary wastewater treatment plants that service them. The ten sanitary wastewater plants listed in the NPDES permit treat wastewater that is collected from office buildings and laboratory facilities. The influent to these sanitary wastewater plants is typical of the influent contributed to a Publicly Owned Treatment Works (POTW) operated by a municipality, i.e., the influent is primarily derived from sanitary waste sources (toilets, laboratories, and showers), but also contains small contributions from food preparation facilities, automobile repair shops, photographic darkrooms, and other industrial and research type activities. In an effort to assure unnecessary contributions of industrial and chemical waste into the sanitary systems, the Laboratory has undertaken a program during the past two years to inspect facilities contributing influent to the sanitary wastewater treatment plants to assure that measures are in place to restrict discharge of incompatible materials. In concert with the inspections, warning signs (example attached) have been distributed and installed on all drains in an effort to further restrict such wastes from being discharged to the sanitary sewer. Even though the Laboratory has implemented administrative controls and holds management responsible for adherence to these controls, the Laboratory is in the process of characterizing waste streams influent to the sanitary system in order to supplement the NPDES application.

I am transmitting the above-mentioned information to EPA, and by copy to EID, in order to further clarify on-going efforts to meet the goals of the Clean Water Act. I trust that this information will be useful. Should you desire a tour of the previously mentioned TA-50 facilities or any other facilities that have bearing on our NPDES permit, please feel free to contact James Phoenix (FTS 843-5288) of my staff.

Sincerely,



Harold E. Valencia  
Area Manager

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3 Enclosures

cc w/enclosures:

James Highland, USEPA, Region VI, Dallas, TX

Kathleen Sisneros, NMEID, Santa Fe, NM

Jack Ellvinger, NMEID, Santa Fe, NM

cc w/o enclosures:

A. Tiedman, LANL, ADS, MS A120

J. Puckett, LANL, HSE-DO, MS K491

M. Martz Emerson (HSE8-88-155-1, 3/8), LANL, HSE-8, MS K490