



New Mexico Health and Environment Department

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**MEMORANDUM**

TO: C. Kelly Crossman, Hazardous Waste Bureau

FROM: Mike Saladen, Surface Water Quality Bureau *MS*

DATE: June 1, 1989

RE: LANL Monitoring

I have reviewed the draft RCRA permit for LANL which is currently in the Public Comment period. Listed below are some comments addressing monitoring of the surface discharges:

- 1) LANL is required to take surface water samples and analyze for metals, volatile and both acid-and-base neutral semivolatile organic hazardous waste constituents on an annual basis. If the permittee samples a monitoring site more than once a year, all samples need to be included in the annual report. The permittee should include number of samples collected, average and maximum values, as well as standard deviations from the mean.

Monitoring locations should include monitoring stations on Mortandad Canyon and a new station in Los Alamos Canyon, downstream for "Basalt Spring." These monitoring sites are on main watershed systems to the Rio Grande. The total impact on the environment must be evaluated from all watershed systems.

Please add the total metals, including, copper, zinc and iron, to the annual monitoring list. These toxic parameters are listed in section 307(a) of the Clean Water Act and are not currently monitored under any permit. Also add total chlorine residual, a known toxic, with adverse effects on aquatic life at certain levels. Please add hardness testing to the annual monitoring list. Many of the parameters listed in the permit are hardness dependent, and the effects of these parameters can not be evaluated without this information. The regulatory agency must include the aforementioned parameters to help evaluate the impact to human health and the environment from the surface discharges at LANL.



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2) Records of monitoring information should include:

- a. The date, exact place, and time of sampling or measurement;
- b. The individual(s) who performed the sampling or measurement;
- c. The date(s) analyses were performed;
- d. The individual(s) who performed the analyses;
- e. The analytical techniques or methods used; and,
- f. The results of all such analyses.

Records such as described above help the regulatory agency evaluate the validity of the data submitted by the permittee. It also helps verify if the permittee is using the correct EPA approved methods for sample anylses.

3) The permittee should allow authorized representatives, upon the presentation of credentials and other documents required by law, to:

- a. Enter upon the permittee's premises where as regulated facility or activity is located or conducted;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facility, equipment, procedures or operations regulated under the permit;
- d. Sample or monitor for the purpose of assuring permit compliance.

4) LANL currently has 105-109 permitted NPDES outfalls. Are all these outfalls included in the surface water monitoring? Should all NPDES outfalls be included?

5) Samples and measurements taken should be representative of the volume and nature of the monitored discharge. All samples should be taken at the monitoring points specified in the permit, and, unless otherwise specified, before the effluent joins or is diluted by any other wastestreams, body of water or substance.