

N3B-Los Alamos 1200 Trinity Drive, Suite 150 Los Alamos, New Mexico 87544 (505) 661-5918



Environmental Management Los Alamos Field Office P.O. Box 1663, MS M984 Los Alamos, New Mexico 87545 (505) 257-7950/FAX (505) 606-2132

Date: **JAN 2 9 2020**Refer To: N3B-20-0025

Steve Pullen
Program Manager
Groundwater Pollution Prevention Section
New Mexico Environment Department
P.O. Box 5469
1190 S. St. Francis Drive
Santa Fe, NM 87502

GROUND WAT ER

JAN 29 2020

**BUREAU** 

Subject: Submittal of Discharge Permit 1793 Renewal Application

Dear Mr. Pullen:

On July 27, 2015, the New Mexico Environment Department (NMED) issued Discharge Permit (DP) 1793 to the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) for the discharge of treated groundwater. On April 30, 2018, operational responsibility of DP-1793 was transferred from LANS to Newport News Nuclear BWXT-Los Alamos, LLC. The term of DP-1793 is 5 years and will end on July 27, 2020. In order to continue operations under DP-1793, a renewal application is required to be submitted to NMED at least 180 days before the date DP-1793 expires.

The technical information supporting this application includes the information submitted for the 2015 permit, which is incorporated in this application by reference. The conditions included in DP-1793, as issued in 2015, are sufficient to ensure that applicable requirements are met. DOE/N3B are proposing to make minor modifications to Permit Condition #4 of the 2015 permit as indicated in Section III of the attached permit renewal application.

Enclosed are two hard copies and an electronic copy of a renewal discharge permit application for DP-1793. The enclosed renewal discharge permit application is intended to provide the foundation for the re-issuance of DP-1793 with additional details being provided to NMED in project-specific work plans. As such, the renewal of the discharge permit will provide umbrella coverage for a diversity of groundwater activities at Los Alamos National Laboratory.

If you have questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@emla.doe.gov) or Cheryl Rodriguez at (505) 257-7941 (cheryl.rodriguez@em.doe.gov).

Sincerely,

Cligated Janes
Elizabeth Lowes

Program Manager

Environment, Safety and Health

N3B-Los Alamos

Sincerely,

July Malhee

David Nickless, Acting Director

Office of Quality and Regulatory Compliance

Environmental Management

Los Alamos Field Office

#### Enclosure:

1. Two original signature hard copies and one electronic copy – New Mexico Environment Department Ground Water Quality Bureau Groundwater Discharge Permit Application

cc (letter and enclosure emailed):

Arturo Duran, EM-LA

Douglas Hintze, EM-LA

Cheryl Rodriguez, EM-LA

Hai Shen, EM-LA

Ben Underwood, EM-LA

Emily Day, N3B

Erich Evered, N3B

Danny Katzman, N3B

Christian Maupin, N3B

Glenn Morgan, N3B

Joseph Legare, N3B

Dana Lindsay, N3B

Frazer Lockhart, N3B

Elizabeth Lowes, N3B

Bruce Robinson, N3B

Steve White, N3B

emla.docs@em.doe.gov

N3B Records

Public Reading Room (EPRR)

PRS Website



# NEW MEXICO ENVIRONMENT DEPARTMENT GROUND WATER QUALITY BUREAU



## GROUND WATER DISCHARGE PERMIT APPLICATION

Instructions for completing the application are included in the form itself and in the Supplemental Instructions found at the back of the application. You may fill out the application manually, or a Microsoft Word version may be downloaded from <a href="https://www.env.nm.gov">www.env.nm.gov</a> (Ground Water Quality) and filled out electronically. Timely processing of this application is contingent upon the technical completeness of the submission. Failure to provide all of the information pursuant to Section 20.6.2.3106 NMAC, following notice of technical deficiency, may result in denial of the application.

# Send two complete paper copies AND one electronic copy of this application, with the filing fee to:

Program Manager Ground Water Pollution Prevention Section New Mexico Environment Department P.O. Box 5469 Santa Fe, NM 87502

## Introduction

Fac	cility Name: Los Alamos National Laboratory	GWQB – Date of Receipt
		(Department use only)
<u>For</u>	r Existing Discharge Permits:	
	DP Number: <u>1793</u>	
	Expiration Date: 07/27/2020	
Typ	rpe of Discharge (check one):	
	Domestic	
	Industrial	
	Agricultural	
	Mining	
<u>Tyr</u>	pe of Application (check appropriate box)	
	New – new facility	
	New – existing (unpermitted) facility	
$\boxtimes$	Renewal only	
	Modification only "modification" includes a change in the <u>location</u> of a discharge of the discharge, and/or a <u>change in the quality</u> of the discharge	- · · · · · · · · · · · · · · · · · · ·
	Renewal and Modification	

If this application is to *modify* or *renew and modify* a Discharge Permit, what is the reason for modification of the Discharge Permit? Describe the proposed changes that would result in modification, meaning a change in the <u>location</u> of a discharge, and/or an <u>increase in the quantity</u> of the discharge, and/or a <u>change in the quality</u> of the discharge.

Not Applicable (NA). This discharge permit application renewal does not propose any modifications that would change the location, quantity, or quality of discharges.

#### **Fees Included with Application**

All applicants are required to submit a \$100 Application Filing Fee. An additional fee will be assessed prior to permit issuance. Permit fees are listed in section 20.6.2.3114 NMAC. Make checks payable to: NMED-Ground Water Quality Bureau

#### **Application Checklist**

The following checklist has been provided to assist in ensuring that the application is complete prior to submission (*check all that apply*):

	Det I A lei interior Completence
	Part I. Administrative Completeness
	\$100 Application Filing Fee
	A. General Information
	B. Public Notice Information
	C. Public Notice Preparation
$\boxtimes$	Part II. Technical Completeness
	A. Discharge Volume and Description
	B. Identification and Physical Description of Facility
	C. Flow Metering
	D. Ground Water Monitoring
	E. Engineering and Surveying (electronic copies)
	F. Land Application Area
	Part III. Site-Specific Proposals
$\boxtimes$	Part IV. Electronic (PDF) format of Maps and Logs is required (additional paper copies of
	maps and logs are optional and may be requested by the Department if required for review)
	A. Surface Soil Survey and Vadose Zone Geology
	⊠ B. Location Map
	C. Flood Zone Map

Copies	of Appli	cation								
An appl	icant appl	ying for a Disc	charge Po	ermit shall su	ıbmit <b>tv</b>	wo paper cop	ies of the signed application,			
and an	electronic	copy of the s	igned ap	pplication in	cludin	g all supporti	ing documentation, to the			
address	listed belo	ow.								
$\boxtimes$	Two pap	Two paper copies – completed and signed								
	Electronic copy in portable document format (PDF) of the signed application and all supporting documentation (designs, maps, logs), on the following media <i>(choose one)</i> :									
		Compact disc	(CD)/DV	/D		Flash drive				
	Program Ground	plication and Manager Water Pollutio	n Preven	ntion Section	2	ss:				
		xico Environn	nent Dep	artment						
	P.O. Box									
	Santa Fe	, NM 87502								
Amplica	m42a Sia	m a truma								
	ant's Signant of the must be		son liste	ed as the lega	llv resp	onsible party	on this application (Part I, 2a).			
218		the property of the property o			,p	ensiere parej	(1 a.c. 1, 2a).			
		ttest under per application for					and supporting documentation			
Signatu	ıre:	Dal	1 m	illen		Date:	1-28-20 ACTING DIFFEREN			
Printed	Name:	DAVID	3	Nick	L E 55	Title:	Acting Director OpiRC			
Signatu	ıre:	El 1ki	hel	Dao		Date:	1-23-2020			

Environment, Safety & Healty Program Manager

Title:

Printed Name:

ELIZABETH LOWES

## Part I. Administrative Completeness

#### **General Information**

#### 1. Facility Information

See Supplemental Instructions to determine what constitutes a "facility." The physical address <u>must be provided</u>. If the facility does not have an address, the location can be described by road intersections, mile posts, or landmarks, as appropriate. See Supplemental Instructions for additional information.

Facility Name	Los Alamos National Laboratory (LANL or the Laboratory)
Discharge Permit #	1793
Physical Address	Los Alamos, New Mexico
County	Los Alamos
Type of Facility	U.S. Department of Energy (DOE) Facility
Driving Directions	All project sites will be located at LANL, Los Alamos, NM. Project-specific maps will be provided to the New Mexico Environment Department (NMED) in each work plan.

#### 2. Contact Information

**a) Applicant Information** The applicant is the person or entity (e.g., corporation, partnership, organization, *municipality*, etc.) <u>legally responsible</u> for the discharge and for complying with the terms of the Discharge Permit. If the applicant is an entity, then the name and title of a contact person must be provided. This application must be signed by the applicant or contact person named here.

Applicant Name Mailing Address	U.S. Department of Energy <sup>1</sup> Newport News Nuclear BWXT-Los Alamos, LLC (N3B) <sup>2</sup> Title  P.O. Box 1663, MS M984 <sup>1</sup> 1200 Trinity Drive, Suite 150 <sup>2</sup>						
	City Los Alamo	os <sup>1,2</sup>	State	NM <sup>1,2</sup>	2	Zip	87545 <sup>1,2</sup>
	David Nickless <sup>1</sup>						Quality and Regulatory
Contact Person	Elizabeth Lowes <sup>2</sup>			Title		oliance <sup>1</sup> am Manager,	N3B <sup>2</sup>
	Office Number	(505) 257-75 (505) 257-75		Fax Nu	mber_	NA	
Contact	-	(505) 553-54				david.nickle	ess@em.doe.gov1
Information	Cell Number	(757) 810-76	524 <sup>2</sup>	E-m	ail _	glenn.morga	an@em-la.doe.gov <sup>2</sup>

**b)** Facility Operator/Manager Information Provide the contact information for the facility operator or manager below. If the facility is required to have an operator certified by the State of New Mexico, please include the certification level of the operator named here.

Name	Glenn Morgan, N3B			Title	Program	n Manager	
Mailing Address	1200 Trinity Drive, Suite 150						
	City	Los Alamos	State	NM	-	Zip	87544

	Office Number	(505) 257-7160	Fax Number	NA
Contact Information	Cell Number	(757) 810-7624	E-mail	glenn.morgan@em- la.doe.gov
	Cell Number	NA	E-mail	NA
Certification Level	NA		•	
(if applicable)  c) Consultant's Interpretation and title of a continuous continuous and title of a continuous and title o	` -	. ,	ant is a compa	ny or organization, then the
Company Name (1)	NA			
Company Contact				
Mailing Address				
	City	State	)	Zip
Contact	Office Number		Fax Number	
Information	Cell Number		E-mail	
Company Name (2)	NA			
Company Contact	IVA			
Mailing Address				
Wannig Address	C't-	Chaha		7:
	City	State		Zip
Contact Information	Office Number		Fax Number	
	Cell Number		E-mail	
primary contact for the	is application and/	or facility, list here.		e contacts listed above is a
Name	Christian Maup	ın		Environmental Professional
Mailing Address	1200 Trinity Dr	ive, Suite 150		
	City Los A	lamos State	NM	Zip 87544
Contact	Office Number	(505) 257-7421	Fax Number	NA
Information	Cell Number	(505) 695-4281	E-mail	christian.maupin@em- la.doe.gov
Facility Affiliation	Regulatory Com	pliance	•	
		Agreements [20.6.2.7HF	I NMAC]	
The applicant owns (  The facility	cneck as appropria	ite):		
All discharge s	sites			
Some discharg				

If someone other than the applicant owns the facility or any of the discharge sites, provide ownership information below. For any portion of the facility where the applicant is not the owner of record, the applicant shall submit a copy of any lease agreement or other agreement which authorizes the use of the real property for the duration of the term of the requested permit (typically five years). Lease prices or other prices may be redacted.

- If more than one person has ownership interest, or a partnership exists, list all persons with an ownership interest.
- If a corporate entity holds an ownership interest, provide the name of the corporate entity and the entity's registered agent as filed with the New Mexico Public Regulation Commission.

Name	NA	Title			
Mailing Address					
	City	State	Zip		
Contact	Office Number		Fax Number		
Information	Cell Number		E-mail		
Owns	Owns		A discharge site		
	Attached – lease (or other	er authoriz	zed use) agreement		
Name	NA		Title		
Mailing Address					
	City	State	Zip		
Contact	Office Number		Fax Number		
Information	Cell Number		E-mail		
Owns	The facility		A discharge site		
	Attached – lease (or other	er authori	zed use) agreement		

#### 4. Public Notice Information

**a) Proposed Maximum Daily Discharge Volume**: <u>350,000</u> gallons per day *Note: Use the information from Part II.A.2 following its completion.* 

**b) Depth-to-Most-Shallow Ground Water**: 850–1350 (regional aquifer), 5–50 (alluvial), 100–900 (intermediate-perched) feet

Note: Use the information from Part II.A.2 following its completion.

## c) Pre-Discharge Total Dissolved Solids Concentration in Ground Water

[Subsection C of 20.6.2.3106 NMAC]

Provide the concentration of total dissolved solids (TDS) in ground water prior to discharging from the facility. *Note: This information is likely the same as that submitted in the first application for a Discharge Permit for this facility.* 

- Pre-discharge TDS concentration in ground water: 95.7–201 mg/L (ppm)
   Attached Copy of laboratory analysis report (if available)
- From what source was the sample collected (e.g., upgradient monitoring well, on-site supply well, nearest well within a one-mile radius of the facility)?
   Samples collected on 12/06/2019 from performance monitoring well R-45 screen 1 and on 08/08/2019 from performance monitoring well R-68. Laboratory analysis results available in Attachment A and Intellus New Mexico (www.intellusnm.com).

#### 5. Facility Location

In the table below, describe the location for the entire facility by listing the Township, Range, and Section, and/or latitude and longitude for the locations of all components of the processing, treatment, storage, and/or disposal system. See Supplemental Instructions for additional information. [Paragraph (2) and (5) of Subsection C of 20.6.2.3106 NMAC]

Component <sup>1</sup> ID	Town ship	Range	Section(s)	Latitude	Longitude
Groundwater monitoring wells	See Att. B	See Att. B	See Att. B	Various (within LANL property)	Various (within LANL property)
Treatment and storage systems	See Att. B	See Att. B	See Att. B	Various (within LANL property)	Various (within LANL property)
Land application equipment	See Att. B	See Att. B	See Att. B	Various (within LANL property)	Various (within LANL property)

#### 6. Processing, Treatment, Storage, and Disposal System

Briefly describe how wastewater, sludge, etc. is processed, treated, stored, and/or disposed of at your facility. Include each component listed in the table above.

Page 7 of 27

<sup>&</sup>lt;sup>1</sup> Components include: septic tanks, impoundments, treatment systems, irrigation sites, leachfields, monitoring wells, mine stockpiles, etc. Additional examples are listed in the Supplemental Instructions. Each component should have a unique ID, for example septic tank-1, monitoring well-3, etc.

See Attachment C for a generalized process flow diagram for the storage, treatment, and land application of groundwater for activities conducted under this discharge permit.

Groundwater pumped from a well will be discharged into a steel frac tank, a lined modular tank, and/or a synthetically lined impoundment near the well site. A feed pump will transfer the untreated groundwater to the treatment system to remove contaminants of concern to concentrations below regulatory limits. Treated groundwater from the treatment system will be discharged into a lined modular tank or a synthetically lined impoundment before land application. Specific components for the processing, treatment, storage, and/or land application will be provided in project-specific work plans. Monitoring of the treated groundwater will ensure that contaminant concentrations do not exceed the 20.6.2.3103 New Mexico Administrative Code (NMAC) standards or the tap water Table A-1 limits in the NMED Risk Assessment Guidance for 20.6.2.7.T(2) NMAC, Toxic Pollutants. At the conclusion of treatment activities, treatment solids will be managed in accordance with all applicable local, state, and federal regulations.

#### **7. Public Notice Preparation** [20.6.2.3108 NMAC]

Once NMED has determined that your application is administratively complete, you must complete the applicant's public notice requirements of Section 20.6.2.3108 NMAC. Language for notifications will be mailed to you with an administratively complete determination. Note: Guidance and instructions for completion of applicant's public notice can also be found at the following link: <a href="https://www.env.nm.gov/gwb/NMED-GWQB-PublicNotice.htm">https://www.env.nm.gov/gwb/NMED-GWQB-PublicNotice.htm</a>. The information requested below will be used by NMED to approve or reject the proposed public notice newspaper and signage posting locations in accordance with Subsection A of 20.6.2.3108 NMAC. Note: Other requirements of Section 20.6.2.3108 NMAC not listed here, such as certified mailings to nearby landowners, may also apply.

#### a) Public Notice Posting Locations

Select the type of application you are submitting and provide the requested information. Language to be used in the required notifications will be included in the administratively complete packet.

## Renewal Application

1. Following receipt of an administrative completeness determination from NMED, the applicant is required to provide public notice of this application by placing a 2 inch by 3 inch display ad (classified or legal sections are <u>not</u> acceptable) in a newspaper of general circulation in the location of the proposed discharge. Indicate the newspaper in which you intend to place the ad. [Subsection C of 20.6.2.3108 NMAC]

	-	-	
Newspaper:	Los Alamos Daily Mon	nitor and Santa Fe New Mexican	

New Application, Modification Application, or Renewal with Modification Application

1. Following receipt of an administrative completeness determination from NMED, the applicant is required to provide public notice of this application by placing a display ad (classified or legal sections are <u>not</u> acceptable) in a newspaper of general circulation in the location of the proposed discharge. Indicate the newspaper in which you intend to place the ad. [Paragraph (4) of Subsection B of 20.6.2.3108 NMAC]

#### Newspaper:

2. Following receipt of an administrative completeness determination from NMED, the applicant is required to post a sign(s) (2 feet x 3 feet in size) for 30 days in a location conspicuous to the public at or near the facility. One sign must be posted for each 640 contiguous acres or less. NMED may require additional postings for facilities of more than 640 acres or when the discharge site(s) is not

located on contiguous properties. Indicate the location(s) where you intend to display the sign(s). [Paragraph (1) of Subsection B of 20.6.2.3108 NMAC]

Note: Conspicuous location means a location where the sign is visible and legible to the public and the public has access (e.g., at facility entrance on public road).

0	Is the entire facility (including all components and discharge sites) contained within <b>less than</b> 640 acres, <u>and</u> is the acreage contiguous?
	Yes - Indicate a sign location below.  No - Indicate <b>two</b> sign locations below.
S	ign Location(s):
3. <i>No</i>	Following receipt of an administrative completeness determination from NMED, the applicant is required to post an additional notice (a flyer 8.5" X 11" or larger) for 30 days at an off-site location conspicuous to the public (e.g., public library). Indicate the location where you intend to display the flyer. [Paragraph (1) of Subsection B of 20.6.2.3108 NMAC]  ste: The U.S. Postal Service no longer allows the posting of flyers in post offices.
Fly	yer Location:
b) Mailing la) The administration to:  Applicant	istrative completeness determination letter, including public notice instructions, should be

## Part II. Technical Completeness

#### 1. Discharge Volume and Description

a. Date of Initial Discharge at the Facility [Subsections A and B of 20.6.2.3106 NMAC]

Date of Initial Discharge: <u>07/27/2015</u>

### **b. Determination of Maximum Daily Discharge Volume** [Subsection C of 20.6.2.3106

NMAC]

See Supplemental Instructions for more information.

1. **Proposed maximum daily discharge volume:** 350,000 gallons per day.

(Note: Use this volume to complete Part I.4.a (Public Notice).

Describe the methods and calculations used to determine this volume. Acceptable methods are
described in the Supplemental Instructions. If you are relying on metered flows, attach a two-year
record of meter readings.

Maximum daily discharge volume under this discharge permit application is 350,000 gallons per day. Under circumstances where multiple projects are overlapping, cumulative maximum discharge volume is limited to 350,000 gallons per day.

Describe what generates the wastewater, sludge, or other discharges processed and/or disposed of
at your facility. Identify all sources (e.g., RV spaces, mobile homes, shower facilities, laundromat,
restaurant, backwash systems, septage haulers, contaminated media, etc.). See Supplemental
Instructions.

Activities at LANL may produce groundwater that requires treatment prior to land application. Groundwater that requires treatment contains contaminants that exceed the 20.6.2.3103 NMAC groundwater standards or 20.6.2.T(2) NMAC toxic pollutants that exceed the NMED Risk Assessment Guidance soil screening levels for tap water. The activities the may produce groundwater that requires treatment include (1) pumping tests and aquifer tests to characterize groundwater quality and aquifer properties, (2) well development during construction of new monitoring and injection/extraction wells or the rehabilitation of existing wells that are no longer providing representative data, (3) purging of groundwater monitoring wells, and (4) tracer studies to characterize hydraulic, geochemical, and transport properties of the subsurface flow medium. These activities are described in additional detail as follows.

- 1. Aquifer Tests and Pumping Tests. Aquifer tests and pumping tests are typically conducted to evaluate an aquifer by "stimulating" the aquifer through constant pumping and observing the aquifer's "response" in observation wells. Developing conceptual models on the nature and extent of groundwater contamination at LANL may require aquifer testing to better define aquifer parameters and variations in contaminant concentrations during pumping. Aquifer testing produces groundwater requiring management and disposal. In addition, new wells may be constructed that may be candidates for aquifer testing. Groundwater produced during an aquifer test is eligible for discharge by land application if it meets the conditions of this discharge permit application.
- 2. Well Development and Well Rehabilitation. Concerns about the reliability or representativeness of groundwater quality data obtained from a well may necessitate well rehabilitation. Well rehabilitation may produce groundwater requiring management and disposal. In addition, new wells may be constructed that would require development before completion. Groundwater produced during well development and rehabilitation is eligible for discharge by land application if it meets the conditions of this discharge permit application.
- 3. Groundwater Monitoring Purge Water. Groundwater produced during purging of groundwater monitoring wells is eligible for discharge by land application if it meets the conditions of this discharge permit application.
- 4. Tracer Studies. Tracers may be deployed in conjunction with a pumping or aquifer test or as a standalone study. Injection in the regional aquifer or intermediate-perched aquifers is done to

characterize hydraulic, geochemical, and transport properties of the subsurface flow medium. Groundwater containing recovered tracers is eligible for discharge by land application if it meets the conditions of this discharge permit application.

2. **Identify other wastewater or stormwater discharges at the facility** not described in this application and indicate what other permits apply to them. Examples include discharges from small septic systems covered by Liquid Waste Permits, discharges to surface waters under a NPDES permit, a discharge covered by a separate Discharge Permit, etc. Be sure these other discharge locations are identified on the site map required in item Part II.B.1.

Other Discharges	Permit Number
See Attachment D	See Attachment D

#### 2. Identification and Physical Description of Facility

[Subsection C of 20.6.2.3106 NMAC]

#### a. Scaled Map

Provide a clear and legible scaled <u>electronic</u> map of the components of your proposed system and relevant surrounding features, indicating the location of all the following features present at the site:

- overall facility layout
- treatment units
- lagoons
- tanks
- sumps
- land application fields
- domestic wastewater re-use areas
- pits
- stockpiles
- leachfields
- sludge drying beds
- fences

- roads
- buildings
- supply wells
- monitoring wells
- extraction/injection wells
- arroyos
- nearby water bodies such as ponds or canals
- property boundaries
- other permitted discharges
- required setbacks
- north arrow

## **b.** Description of Components

<sup>&</sup>lt;sup>1</sup>Status = **proposed**; **existing in use**; **existing not in use**, but proposed for use; **abandoned** without closure, not proposed for use; or **closed** 

## 3. Flow Metering

Describe the facility's flow metering system. See Supplemental Instructions for more information.

Meter ID <sup>1</sup>	Proposed or Existing?	Influent or Effluent?	Location Description	Flow Type <sup>2</sup>	Meter Type <sup>3</sup>	Supporting Documents Attached
Various	Various	Various	See Attachment G	Various	Various	Various

Meter ID means the numbering or labeling system used to individually identify each meter (e.g., Meter-1, Irrigation Meter-1, etc.).
 Flow type - gravity flow or pressurized (pumped) flow
 Meter type - open channel such as a weir or flume, or a closed-pipe velocity meter such as an electromagnetic meter

#### 4. Discharge Quality

Indicate the expected quality of the discharge (wastewater, leachate, sludge, etc.) that is generated, stored, treated, processed and/or discharged at your facility.

Note: Not all facilities need to characterize influent quality. See Supplemental Instructions for additional guidance.

Contaminants	Contaminants		
	Incoming (Influent)	Final (Effluent)	
Nitrate as Nitrogen (NO <sub>3</sub> -N, mg/L) <sup>1</sup>	See Attachment H	See Attachment H	
Total Kjeldahl Nitrogen (TKN, mg/L) <sup>1</sup>	See Attachment H	See Attachment H	
Total Dissolved Solids (TDS, mg/L) <sup>1</sup>	See Attachment H	See Attachment H	
Chloride (Cl, mg/L) <sup>1</sup>	See Attachment H	See Attachment H	
Total Suspended Solids (TSS, mg/L) <sup>2</sup>	See Attachment H	See Attachment H	
Biochemical Oxygen Demand (BOD, mg/L) <sup>2</sup>	See Attachment H	See Attachment H	
Fecal Coliform Bacteria (CFU/100 mL) <sup>2</sup>	See Attachment H	See Attachment H	
pH <sup>3</sup>	See Attachment H	See Attachment H	
Metals (attach list) <sup>3</sup>	See Attachment H	See Attachment H	
Organic Compounds (attach list) <sup>3</sup>	See Attachment H	See Attachment H	

- 1. Include for all domestic systems.
- 2. Include for domestic systems that use an advanced treatment process.
- 3. Include for industrial or mining systems if these are contaminants of concern. If metals or organic compounds are present in the discharge, attach a list of influent and effluent concentrations for each metal/organic compound.

#### 5. Ground Water Monitoring

Discharge Permits typically require that ground water samples be collected quarterly from properly constructed monitoring wells located downgradient from discharge locations. The samples must be analyzed for contaminants of concern. For most domestic and agricultural Discharge Permits, the typical contaminants of concern are total Kjeldahl nitrogen (TKN), nitrate-nitrogen (NO<sub>3</sub>-N), total dissolved solids (TDS), and chloride (Cl). For most industrial Discharge Permits, typical contaminants of concern are volatile and semi-volatile organic compounds (VOC's), polynuclear aromatic hydrocarbons (PAH's), polychlorinated biphenyls (PCB's), metals, and radionuclides. See Supplemental Instructions for additional information.

#### a. Depth-to-Most-Shallow Ground Water [Subsection C of 20.6.2.3106 NMAC]

#### 1. Facilities with on-site monitoring wells

Provide the depth-to-most-shallow ground water from the most recent ground water levels obtained from monitoring wells at the facility. Depth-to-ground water shall be measured to the nearest 0.01 feet using standard methods and techniques [Subsection B of 20.6.2.3107 NMAC].

Depth-to-ground water is: <u>850–1350</u> (regional aquifer), <u>5–50</u> (alluvial), <u>100–900</u> (intermediate-perched) feet

Note: Use this depth to complete Part I.4.b (Public Notice).

#### 2. Facilities without on-site monitoring wells

If a facility does not have a monitoring well intersecting most-shallow ground water, provide depth-tomost-shallow ground water for all wells on file located within one mile of the boundary of the facility. This information can be obtained from the Office of the State Engineer (http://www.ose.state.nm.us).

	round water is: feet the range of depths from these records to complete Part I.4.b (Public Notice).
	<ul> <li>Attached – Records from the Office of the State Engineer, including the following:</li> <li>location of each well by latitude/longitude and township, range, and section</li> <li>use of each well</li> <li>depth to ground water in each well</li> <li>total depth of each well</li> </ul>
1. <b>Facilitie</b> Provide ground water ele	es with three or more on-site monitoring wells water flow direction beneath the facility on a ground water elevation contour map. The evation contour map shall be developed based upon the most recent ground water levels obtained from on-site monitoring wells.
Flow l	Direction See Attachment I
	Included – Ground water contour map from on-site monitoring wells
	Included – Monitoring well survey
I	No survey has been conducted
	Survey previously submitted on (date)
If a facility does ground water flo	es with less than three on-site monitoring wells not have at least three monitoring wells intersecting most-shallow ground water, provide ow direction based upon either the most recent regional water level data or published aformation. Attach the sources of information used to determine ground water flow all that apply.
ι	Ground water flow direction of the most-shallow ground water beneath the facility based upon the <i>most recent regional water level data</i> is  Reference: (attach relevant portions)
	Attached - Survey data from nearby monitoring wells and a <i>ground</i> water elevation contour map indicating the direction of ground water flow.

Ground water flow direction of the most-shallow ground water beneath the facility based

upon *published hydrogeologic information* is \_\_\_\_\_.

-- Reference: \_\_\_\_\_ (attach relevant portions)

# **c. Monitoring Well Construction and Identification** [Subsection C of 20.6.2.3106 NMAC; Subsection A of 20.6.2.3107 NMAC]

1.	For existing monitoring wells		
	Submit construction logs for all existing, on-site monitoring wells, which indicate the date of		
	installa	tion and well driller.	
	$\boxtimes$	Included - Construction logs for each existing monitoring well.	
		Previously Submitted	
		Date	

2. For all monitoring wells - Identify proposed and existing monitoring well (MW) locations.

MW ID <sup>1</sup>	Proposed or Existing?	Location Description <sup>2</sup> AND Latitude and Longitude	Screen Interval (ft)	Depth to Water
See Att. J	See Att.JI	See Attachment J	See Att. J	See Att. J

<sup>&</sup>lt;sup>1</sup> MW ID (Monitoring Well ID) is the numbering or labeling system used to identify a MW (e.g., MW-1, MW-2, etc.).

<sup>&</sup>lt;sup>2</sup> Example: 60 feet south of the top inside edge of the berm of Wastewater Impoundment-1

## d. Past Ground Water Monitoring Results

This item applies only to existing facilities seeking renewal and/or modification of a Discharge Permit that required ground water monitoring. See Supplemental Instructions for additional information.

1. Attach a graph or table showing all analytical results from ground water monitoring.

### e. Engineering and Surveying

## **Proposed New Structures or Improvements to Existing Structures**

Include <u>electronic</u> plans and specifications for any *proposed* new structures or improvements to existing structures. All final plans and specifications must bear the stamp of a New Mexico licensed Professional Engineer.

• Propos	ed plans and specifications included (Select all that apply)  Included for new structure(s)
	Included for improvements to an existing structure
$\boxtimes$	No proposals for new or improved structures
For facilities prealculations should in the amount reasons period. Forms attps://www.e	dication Area Information roposing to apply reclaimed or treated wastewater to a land application area, provide owing that nitrogen loading does not exceed 200 lbs/acre/year or that the amount of total combined application of wastewater and fertilizer does not exceed by more than 25% the ably expected to be taken up by the crop(s) and removed by harvesting in any 12-month to assist in these calculations can be found at:  anv.nm.gov/gwb/FORMS/NewMexicoEnvironmentDepartment- QualityBureau-Forms.htm.
	Attached – Nitrogen loading calculations

## Part III. Additional Proposals and Conditions (if applicable)

In the space provided, propose revisions or additions to the standard Discharge Permit requirements. If you propose any revisions or additions, also provide the rational for your proposal.

- 1) This renewal discharge permit application for Discharge Permit 1793 is an "umbrella" discharge permit application for activities at LANL that may produce groundwater requiring a permit before land application on LANL property, not subject to other discharge permits or NPDES permits, including (1) pumping tests and aquifer tests to characterize groundwater quality and aquifer properties, (2) well development during construction of new monitoring and injection/extraction wells or the rehabilitation of existing wells that are no longer providing representative data, (3) purging of groundwater monitoring wells, and (4) tracer studies to characterize hydraulic, geochemical, and transport properties of the subsurface flow medium. As such DOE/N3B propose to submit a project-specific work plan 60 days before the commencement of any of the activities described in this discharge permit application for NMED review and approval. Each work plan will contain the following information, as applicable to the project:
- a. A detailed description of the proposed activity, including a statement of purpose.
- b. A description of water conservation and reuse options considered.
- c. A topographic map showing the proposed land application sites and the location of all monitoring wells, site monitoring areas, National Pollutant Discharge Elimination System outfalls, solid waste management units/areas of concern identified in the 2016 NMED Compliance Order on Consent, drinking water wells, surface impoundments, and surface drainage features in the vicinity. The topographic map will include all other applicable items described in Parts II.2.a and IV.2 of this discharge permit application.
- d. Depth to most shallow groundwater per Parts I.4.b and II.5.a of this discharge permit application.
- e. Existing data showing the depth to and general groundwater quality at the proposed discharge location including concentrations of contaminants exceeding regulatory standards.
- f. A graph or table showing all applicable analytical results from groundwater monitoring per Part II.5.d of this discharge permit application.
- g. Groundwater contour map per Part II.5.b of this discharge permit application.
- h. Schematic and detailed description of the on-site treatment system to remove contaminants of concern per Part II.2.b of this discharge permit application.
- i. Flow metering system information per Part II.3 of this discharge permit application.
- j. Monitoring well construction and identification information per Part II.5.c of this discharge permit application.
- k. Lithologic logs for all existing on-site monitoring wells per Part IV.1 of this discharge permit application.
- l. Soil survey map and associated descriptions identifying surface soil type(s) per Part IV.1 of this discharge permit application.
- m. Most recent flood zone map per Part IV.3 of this discharge permit application.
- n. A detailed description of the storage/containment systems associated with the treatment.
- o. Maximum daily discharge volume.
- p. Total estimated volume of proposed discharge.
- q. Proposed sampling plan to demonstrate treatment efficiency and compliance with regulatory standards.
- r. Proposed method(s) of land application, application rates, and area of application.
- s. Project schedule including the date the discharge is to commence and anticipated duration.

- 2) An annual report will be submitted to NMED by the 1<sup>st</sup> of March each year summarizing all discharges conducted under this discharge permit application during the prior calendar year. Included will be quantity, source, and date of each individual discharge; water quality tables listing analytical results from samples collected under the water quality sampling plan; a map(s) depicting discharge locations; and copies of analytical reports.
- 3) All activities covered under this discharge permit application will be supervised daily by operators qualified to perform system maintenance.
- 4) The land application of treated groundwater will be conducted in accordance with, but not limited to, the following:
- a. Land application sites are prohibited at the following locations:
  - Watercourses
  - Water bodies
  - Wetlands
  - Areas of concern
  - Solid waste management units
- b. Land application cannot result in water flow from an approved land application site.
- c. Land application cannot create ponds, pools, or standing water.
- d. Land application must be conducted in a manner that maximizes infiltration and evaporation.
- e. Land application must be restricted to daylight hours.
- f. Land application must be supervised.
- g. Land application cannot extend off LANL property.
- h. Land application will be terminated if leaks in the application system are detected.
- i Land application is prohibited while precipitation is occuring or when the ground is frozen.
- 5) The technical information supporting this application includes the information submitted for the 2015 permit, which is incorporated in this application by reference. The conditions included in Discharge Permit 1793, as issued in 2015, are sufficient to ensure that applicable requirements are met. DOE/N3B is proposing to make minor modifications to Permit Condition #4 of the 2015 permit as follows:
- a. Changing Permit Condition #4.1 which states "Land application is prohibited at the following locations:"
- i. Revising the language of the forth bullet to read "Areas of Concern."
- ii. Deleting the sixth bullet which states "Slopes greater than 2% if the site is poorly vegetated (<50% ground cover).
- iii. Deleting the seventh bullet which states "Slopes greater than 5% if the site is well vegetated (>50% ground cover).
- b. Changing Permit Condition #4.5 to read "Land application is restricted to daylight hours."
- c. Changing Permit Condition #4.7 to read "Land application cannot occur off LANL property."
- d. Changing Permit Condition #4.9 to read "Land application is prohibited while precipitation is occurring or when the ground is frozen."

The above proposed changes provide equivalent protection while allowing necessary operational flexibility. Land application activities will still be performed such that ponding, pooling, or standing water will not be generated and run-off will not occur from approved land application sites. Additionally, the proposed change to Condition #4.7 conforms to the intent of maintaining land

application within the boundaries of LANL. This is consistent with DOE/N3B's understanding of the 2015 Permit.

## Part IV. Maps and Logs to be Attached

#### 1. Surface Soil Survey and Vadose Zone Geology

[Subsection C of 20.6.2.3106 NMAC]

- Attached Most recent regional soil survey map and associated descriptions identifying surface soil type(s).
- Attached Lithologic logs for all existing on-site monitoring wells (if available).

#### **2. Topographic Map** [Subsection C of 20.6.2.3106 NMAC]

- Attached Location map with topographic surface contours identifying all of the following features located within a one-mile radius of the facility:
  - watercourses
  - lakebeds
  - sinkholes
  - playa lakes
  - springs (springs used to provide water for human consumption shall be so denoted)
  - wells supplying water for a public water system

- private domestic water wells
- irrigation supply wells
- ditch irrigation systems
- acequias
- irrigation canals
- drains

#### 3. Flood Zone Map [Subsection C of 20.6.2.3106 NMAC]

Attached - Most recent 100-year flood zone map developed by the federal emergency management administration (FEMA) documenting flood potential for the facility.

Describe any engineered measures used for flood protection.

Any engineered measures used for flood protection will be provided in a project-specific work plan.

#### 4. Additional Information

Describe any additional relevant information.

No components will be sited within a watercourse. However, some activities may be conducted within the floodplain of a watercourse because of the necessity of siting components in close proximity to the groundwater wells they are serving.

## **Supplemental Instructions**

**Please note:** Discharge Permits are required for a wide range of facilities that process, treat, store and/or dispose of wastewater, sludge, septage, leachate, contaminated soils, mine tailings, industrial waste, mine ore, waste rock, or other similar materials. For the purposes of this application form, the term "discharge" applies to any of these materials whether they are actually discharged or whether they represent only a potential discharge that could occur due to factors such as poor maintenance, improper installation, equipment failure or accidents.

#### Part I.1 Facility Information and Type of Facility

The "Facility" may be identified as:

- a treatment facility, such as a municipal wastewater treatment plant;
- the source of the discharge, such as a subdivision, or waste rock pile;
- a disposal facility or operation, such as for sludge or septage;
- the discharge location or end user of reclaimed wastewater, such as a golf course or cement plant;
- a storage and/or processing facility with off-site disposal;
- a collection of facilities, such as numerous comfort stations at a state park; or
- a project or operation, such as a construction project or a system to distribute reclaimed wastewater throughout a city.

Examples of a variety of facility types are categorized below. Please note, "Domestic" waste contains human excreta or originates from typical residential plumbing fixtures.

#### **Industrial Waste**

- Manufacturing
- Power plant
- Military installation
- Vehicle/equipment wash
- Mortuary
- Hydrocarbon landfarm
- Ground water remediation
- Ethanol plant
- Asphalt plant
- Remediation Systems

#### Mining Waste

- tailing impoundment
- mine dewatering
- waste rock pile
- smelter slag
- in-situ leach
- leach piles
- pipelines
- collection ponds
- concentrator other beneficiation

#### Domestic Waste

- Municipal wastewater treatment plant
- Septage disposal
- Sludge disposal
- Mobile home/RV park
- Campground/park
- School/educational facility
- Restaurant
- Subdivision/apartment complex
- Unincorporated community
- Lodging/resort/spa
- Residential facility
- Commercial/shopping complex
- Laundromat
- Facility using reclaimed domestic wastewater

#### Agricultural Waste

- Dairy
- Food processing
- Slaughter facility
- Nursery/greenhouse
- Manufacture/processing of agricultural chemicals
- Feedlot
- Livestock truck washout

This listing is only a guide, as there can be crossover between categories. For example, a golf course might use treated industrial wastewater for irrigation. The type of facility in that case is "golf course" and the type of waste is "industrial." A mining operation may need a permit for its restroom and shower facilities. In that case, the type of facility is a "mining operation" and the type of discharge is "domestic waste."

#### **Part I.5: Facility Location**

The following are examples of treatment, storage, and disposal components of a wastewater system that should be included in this part.

#### **Treatment Methods**

- Septic tank
- Grease interceptor
- Oil/water separator
- Manure separator
- Wetlands
- Lagoon (indicate whether aerated and type of liner)
- Trickling filter
- Activated sludge (extended air, SBR, etc.)
- Sand filter
- Membranes
- Sludge drying bed
- Disinfection (specify type)
  - > chlorination

#### **Disposal Methods**

- Leachfield
- Infiltration gallery
- Evaporation lagoon (indicate type of liner)
- Evaporation tank
- Impoundment
- Discharge to waters of the US (NPDES permit required)
- Ongoing land application (specify type)
  - ➤ subsurface irrigation
  - ➤ sprinkler irrigation
  - ➤ flood irrigation
  - ▶ drip irrigation
  - ➤ surface spreading (solids)
  - ➤ surface injection (solids)

- UV/ozone
- Water treatment plant
- Injection Wells

- Temporary uses of reclaimed wastewater
- Ongoing use of reclaimed wastewater for:
  - Manufacturing construction or dust control

#### Storage Methods

- Above/below ground tank
- Storage lagoon (indicate type of liner)
- Holding tank
- Pit toilet
- Stockpile
- Tailing impoundment

#### Part II.1 Proposed Maximum Daily Discharge Volume

Your Discharge Permit will allow for the treatment, processing and/or discharge of up to a specified volume, generally, a maximum number of gallons per day. The flow at your facility on any given day must not exceed this "maximum discharge volume." It is determined based on the expected contributions from the sources you identified Part II, 1, b, 1.

NMED will carefully review the basis of the maximum discharge volume you propose. Show all your calculations and assumptions.

Animal feeding operations must provide calculations based on the number of animals and water conservation practices in place.

Landfarms, disposal facilities, processing facilities typically identify the expected number of loads to be delivered.

For septic systems and wastewater treatment plants, the maximum discharge volume is also referred to as the "design flow." It includes a peaking or safety factor to guard against back-ups and overflows.

Municipal wastewater treatment facilities should identify the population served, growth assumptions, and expected per capita usage considering any contributing industries.

On-site domestic wastewater treatment facilities should rely on published design flows such as those provided in the NMED Liquid Waste Regulations (20.7.3 NMAC), the Uniform Plumbing Code or the USEPA On-site Wastewater Treatment Systems Manual.

<u>For existing facilities</u>, the maximum discharge volume may be based on a record of measured flows if no changes are anticipated. At least two years of flow data must be submitted, and the highest monthly discharge volume must be multiplied by a peaking factor of 1.5.

NMED will verify that your proposed or existing facility can handle maximum discharge volume you propose.

Be specific in describing all sources. Consider the following examples:

- Municipalities identify particular industries or specialized facilities contributing wastewater.
- RV Parks identify showers, dump stations, laundromat, etc.

- Subdivisions identify homes, apartments, commercial developments, water softener backwash, etc.
- Landfarms or disposal facilities specify type of materials accepted, e.g., residential septage, car wash grit trap waste, contaminated soils/water, treated municipal sludge, etc.
- Dairies identify milking parlors, type of washdown used, sources of stormwater runoff, etc.
- Schools identify cafeteria, gym, showers, etc.
- Truck stops identify restaurant, showers, car wash, etc.
- Facilities receiving reclaimed wastewater identify the treatment facility providing the reclaimed wastewater.
- Food processing and industrial facilities describe the processes which produce the waste stream and chemicals used.
- Mines identify processes including beneficiation, tailing, waste rock, leach facilities, pipelines, ponds, catchments, booster stations, in-situ leach facilities.

You do not need to include solid wastes, hazardous wastes or discharges being managed under other permits; however, these must be listed under Item C-7 in Part C of the application.

#### **Part II.3: Flow Metering**

You must provide a method for measuring the discharge volume (Section 20.6.2.3109.H.1 NMAC). At facilities with treatment or storage lagoons, it is necessary to measure both the volume entering the treatment system as well as the volume ultimately discharged.

If you land apply wastewater to more than one discharge location, you must be able to track the volume to each location.

If your facility is small and relies on gravity to carry wastewater to the treatment and disposal system, it may be acceptable to estimate the wastewater flow. This can be done by metering water usage and deducting the volume of water used for fresh-water irrigation, swimming pools, evaporative cooling, livestock watering or other uses that do not result in wastewater flowing to the treatment system.

#### Part II.4: Discharge Quality

Untreated wastewater entering a treatment facility (also referred to as "influent") must be characterized so that the treatment process can be evaluated. It is not necessary to provide influent quality for systems providing minimal treatment prior to discharge or disposal, such as systems relying on crop uptake for treatment (e.g., dairies), septic tank – leachfield systems, storage/processing facilities or evaporative systems. The final quality of the waste or wastewater disposed of or discharged must be characterized for all facilities.

For most agricultural and domestic facilities, the contaminants of concern include nitrate as nitrogen (NO<sub>3</sub>-N), total Kjeldahl nitrogen (TKN), total dissolved solids (TDS), and chloride (Cl). For domestic facilities with advanced treatment, additional contaminants include total suspended solids (TSS), biochemical oxygen demand (BOD<sub>5</sub>), and fecal coliform bacteria. Contaminants of concern at industrial and mining sites include pH, metals, and organic compounds. List all that apply.

#### Part II.E: Ground Water Monitoring

The <u>depth to ground water</u> beneath your facility and/or discharge site must be provided. This is true even if your facility or operation is intended to have no discharge. Discharge Permits are required for "no-discharge" lagoons, storage tanks, etc. because of the potential for a discharge to occur due to factors such as improper installation, poor maintenance, equipment failure or accidents.

The best way to determine the depth to water is to measure it in an on-site or nearby monitoring well. If a monitoring well is not available, the measurement may be from a water supply well. If there is a well but it is not possible to access it for a measurement, you could refer to the well log for that well and/or others in the vicinity. Well log information is available on the website of the State Engineer's office:

#### http://www.ose.state.nm.us/.

Be aware that water levels have dropped in many areas of the state, so more recent well logs in those areas are more reliable.

There may be a significant discrepancy in the depth to water in different wells, even when falling water levels is not a factor. One reason for this is that a water supply well may rely on a deep aquifer rather than water in the "first" or most shallow aquifer. Discharge Permits are intended to protect all ground water, so it is important to report the shallowest depth in the vicinity of your site.

The <u>total dissolved solids (TDS)</u> concentration of the ground water prior to discharge must be provided. As explained for the depth to water, this is true even if your facility or operation is intended to have no discharge. The TDS value provides a general indication of the quality of the ground water that could be affected by your operation.

The best way to obtain a pre-discharge TDS concentration is to sample an on-site or nearby well before your facility begins operating. It is better to sample a shallow rather than a deep well, if possible. It may be that a neighboring facility has existing analytical data for its Discharge Permit. (If so, be sure to obtain data from a non-impacted well.)

If there are no wells in your vicinity or it is not possible to sample them, you may find general TDS concentrations in reports available from sources such as a university, the State Engineer's Office (<a href="http://www.ose.state.nm.us/">http://www.ose.state.nm.us/</a>) or the US Geological Survey (<a href="http://nm.water.usgs.gov/">http://nm.water.usgs.gov/</a>).

If you are renewing or modifying your Discharge Permit, you may refer to the TDS concentration previously determined if there was a sound basis for it. Monitoring data or other information obtained since the permit was issued, however, may warrant listing a different value.

#### Part II.E.4: Past Ground Water Monitoring Results

A complete list of ground water standards can be found in Section 20.6.2.3103 NMAC. The standards for contaminants most frequently monitored under Discharge Permits are as follows:

Nitrate-nitrogen (NO <sub>3</sub> -N)	10 mg/L
Chloride	250 mg/L
Total dissolved solids (TDS)	1000 mg/L
Sulfate (SO <sub>4</sub> )	600 mg/L
pH bet	tween 6 and 9

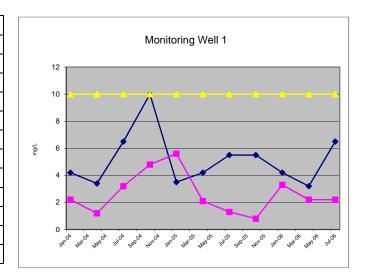
There is no ground water standard for total Kjeldahl nitrogen (TKN). Because TKN converts readily to nitrate as it moves through the vadose zone, however, concentrations approaching or exceeding 10 mg/L are of concern.

Additional parameters typically apply at mining or industrial facilities.

Some ground waters in the state have TDS or chloride concentrations that naturally exceed these standards. In that case, the standard is the naturally occurring level. You must provide documentation of such elevated natural conditions, such as analytical results from a non-impacted well.

An example table and graph follow:

	Monitorii	ng Well 1
Date	NO3-N	TKN
Jan-04	4.2	2.2
Apr-04	3.4	1.2
Jul-04	6.5	3.2
Oct-04	10	4.8
Jan-05	3.5	5.6
Apr-05	4.2	2.1
Jul-05	5.5	1.3
Oct-05	5.5	0.8
Jan-06	4.2	3.3
Apr-06	3.2	2.2
Jul-06	6.5	2.2



# ATTACHMENT A Laboratory Analysis Reports for Total Dissolved Solids

Product: Solids, Total Dissolved Analytical Method: EPA 160.1

Analytical Procedure: GL-GC-E-001 REV# 15

Analytical Batch: 1906257

The following samples were analyzed using the above methods and analytical procedure(s).

<b>GEL Sample ID#</b>	Client Sample Identification
487313002	CAWA-19-183876
487313005	CAWA-19-183989
1204354957	Method Blank (MB)
1204354958	Laboratory Control Sample (LCS)
1204354959	487209007(TRR-28-19-171272) Sample Duplicate (DUP)

The samples in this SDG were analyzed on an "as received" basis.

#### **Data Summary:**

All sample data provided in this report met the acceptance criteria specified in the analytical methods and procedures for initial calibration, continuing calibration, instrument controls and process controls where applicable, with the following exceptions.

#### Quality Control (QC) Information

#### Duplicate Relative Percent Difference (RPD) Statement

The Relative Percent Difference (RPD) between the sample and duplicate falls outside of the established acceptance limits because of the heterogeneous matrix of the sample:

Analyte	Sample	Value
Total Dissolved Solids	1204354959 (TRR-28-19-171272DUP)	6.21* (0%-5%)

ge 1560 of 1725 SDG: N3B-2019-2898

#### **GEL LABORATORIES LLC**

2040 Savage Road Charleston SC 29407 - (843) 556-8171 - www.gel.com

#### **Certificate of Analysis**

Report Date: September 9, 2019

N3B-Los Alamos Company:

Address: Bldg. 271, Embudo Rd

Los Alamos National Laboratory Los Alamos, New Mexico 87544

Contact: Mr. Sean Sandborgh

N3B Project:

Client Sample ID: CAWA-19-183876

487313002 Sample ID:

Project:	N3BL00119
Client ID:	N3BL001

Parameter	Qualifier Result	DL	RL	Units	PF	DF Analyst Date	Time Batch	Method
The following A	nalytical Methods were performed:	1570						
Method	Description				Analys	st Comments	100	
l	EPA 300.0				-			
2	EPA 300.0							
3	EPA 350.1							
4	EPA 353,2							
5	EPA 365.4							
6	EPA 160.1							
7	EPA 310.1							
8	EPA 120.1							
9	EPA 150.1							

#### Notes:

Column headers are defined as follows:
DF: Dilution Factor
DL: Detection Limit Lc/LC: Critical Level PF: Prep Factor RL: Reporting Limit

MDA: Minimum Detectable Activity
MDC: Minimum Detectable Concentration SQL: Sample Quantitation Limit

Page 1568 of 1725 SDG: N3B-2019-2898

#### **GEL LABORATORIES LLC**

2040 Savage Road Charleston SC 29407 - (843) 556-8171 - www.gel.com

## **Certificate of Analysis**

Report Date: September 9, 2019

Company:

N3B-Los Alamos

Address:

Bldg. 271, Embudo Rd

Los Alamos National Laboratory

Los Alamos, New Mexico 87544

Contact: Project:

Mr. Sean Sandborgh

N3B

Client Sample ID: CAWA-19-183989 Sample ID:

487313005

Project:

N3BL00119

Client ID: N3BL001

Parameter	Qualifier Result	DL.	RL	Units	PF	DF Analyst Date	Time Batch	Method
The following A	nalytical Methods were per	formed:						
Method	Description				Analys	st Comments		
1	EPA 300.0							
2	EPA 350.1							
3	EPA 353.2							
4	EPA 365.4							
5	EPA 160.1							
6	EPA 310.1							
7	EPA 120.1							
8	EPA 150.1							

#### Notes:

Column headers are defined as follows:
DF: Dilution Factor
DL: Detection Limit
MDA: Minimum Detectable Activity
MDC: Minimum Detectable Concentration

Lc/LC: Critical Level PF: Prep Factor
RL: Reporting Limit
SQL: Sample Quantitation Limit

Page 1571 of 1725 SDG: N3B-2019-2898

GEL Laboratories LLC

Page 1703 of 1725 SDG: N3B-2019-2898

TDS/TS/VS LogBook

Recovery(%) 101.905 Nc(mg/L) 300 6.2111801242236 Rpd(%) 2921268 Lot Id 1204354959 1204354960 Sample Id Sample Id 1204354958 Sample Type Sample Type CS DO DO

Procedure Description EPA 160.1 Solids, Dissolved Lab Sop GL-GC-E-001 Procedure Code BALDSEP\_L Batch: 1906257 Analyst:KLP1

								Final Wt	Final Wt	Final Wt	Final Wt		
					Crucible	Aliquot	Crucible	Event	Event	Event	Event		
Sample Id	Sample Type	Sample Type Original Hsn	Instrument	Run Date	9	(F)	Wt(g)	-	7	6	4	Result	Units
1204354957	MB		BAL216	12-AUG-2019 14:55	131	0.07	100.4138	100.4136	100.4137			-1.42857	mg/L
1204354958	rcs		BAL216	12-AUG-2019 14:55	I	0.07	71.0176	71,0386	71.039			305.71429	mg/L
487155002	SAMPLE		BAL216	12-AUG-2019 14:55	12	0.07	71.6124	71.6209	71.6209			121.42857	mg/L
487155005	SAMPLE		BAL216	12-AUG-2019 14:55	10	0.07	77,402	77.4147	77.4151			187,14286	mg/L
487155008	SAMPLE		BAL216	12-AUG-2019 14:55	2	0.07	69.9094	69,9213	69.9212			168.57143	me/L
487155010	SAMPLE		BAL216	12-AUG-2019 14:55	21	0.07	69,6559	69.6649	69,6652			132.85714	mg/L
487166001	SAMPLE		BAL216	12-AUG-2019 14:55	4	0.07	75.9304	81.6214	81.6218			81305.71429	mg/L
1204354960	DUP	487166001	BAL216	12-AUG-2019 14:55	IXI	0.07	86.2965	91.8241	91.8244			78970	mg/L
487166002	SAMPLE		BAL216	12-AUG-2019 14:55	۵	0.07	103,6184	111.7776	1777.111			1.17E+05	mg/L
487166003	SAMPLE		<b>BAL216</b>	12-AUG-2019 14:55	U	0.07	97.4415	102.692	102,6919			75005.71429	me/L
487166004	SAMPLE		BAL216	12-AUG-2019 14:55	6	0.07	69.4647	75.3558	75.3561			84162.85714	me/L
487166005	SAMPLE		BAL216	12-AUG-2019 14:55	99	0.07	91.2852	92.4043	92,4042			15985.71429	mg/L
487209005	SAMPLE		BAL216	12-AUG-2019 14:55	CC	0.07	82,1433	82.1682	82,168			352.85714	mg/L
487209006	SAMPLE		BAL216	12-AUG-2019 14:55	ET	0.07	83.0106	83.0353	83.0348			345.71429	me/L
487209007	SAMPLE		BAL216	12-AUG-2019 14:55	19	0.07	9689.69	69,7149	69,7145			355.71429	I/am
1204354959	DUP	487209007	<b>BAL216</b>	12-AUG-2019 14:55	s	0.07	97.7213	97.7442	97.7447			334.28571	mø/L
487209008	SAMPLE		BAL216	12-AUG-2019 14:55	A7	0.07	103.4433	103,4643	103.4643			300	I/am
487213001	SAMPLE		BAL216	12-AUG-2019 14:55	5	0.07	104.1001	104,2345	104.2349			1925.71429	me/L
487217001	SAMPLE		BAL216	12-AUG-2019 14:55	18	0.07	71.9339	71.9397	71.9402			06	me/L
487218001	SAMPLE		<b>BAL216</b>	12-AUG-2019 14:55	٧	0.07	73.6739	73.6889	73.6891			217.14286	me/L
487219001	SAMPLE		BAL216	12-AUG-2019 14:55	ᆼ	0.07	72,6384	72.8625	72.8625			3201.42857	me/L
487313002	SAMPLE		BAL216	12-AUG-2019 14:55	411	0.07	74.9459	74.9577	74.958			172.85714	me/L
487313005	SAMPLE		BAL216	12-AUG-2019 14:55	13	0.07	71.5967	71.6034	71.6034			95.71429	mg/L

Comments: All Weights are in Grams
A) Result = (Final - Crucible)/Aliquot \* 1000 B) Prep Factor = 0.5 / Aliquot

In Oven Date/Time: 13-AUG-2019 09:00:00
In Oven Temperature (178-1820; 180 C
Temperature within limits (Y/N)?: Y
Out Oven Date/Time: 13-AUG-2019 10:00:00
Out Oven Temperature (178-1820; 180 C
Temperature within limits (Y/N)?: Y
In Oven Date/Time: 13-AUG-2019 13:00:00
In Oven Temperature (178-1820; 180 C
Temperature within limits (Y/N)?: Y
Out Oven Date/Time: 13-AUG-2019 14:00:00
Out Oven Temperature (178-1820; 180 C
Temperature within limits (Y/N)?: Y
Filter Lot Number: 950068

Page#

Product: Solids, Total Dissolved Analytical Method: EPA 160.1

Analytical Procedure: GL-GC-E-001 REV# 16

Analytical Batch: 1949668

The following samples were analyzed using the above methods and analytical procedure(s).

GEL Sample ID#	Client Sample Identification
498567002	CAMO-20-190669
498567005	CAMO-20-190675
1204454112	Method Blank (MB)
1204454113	Laboratory Control Sample (LCS)
1204454116	498423006(CAAN-20-190542) Sample Duplicate (DUP)

The samples in this SDG were analyzed on an "as received" basis.

#### Data Summary:

All sample data provided in this report met the acceptance criteria specified in the analytical methods and procedures for initial calibration, continuing calibration, instrument controls and process controls where applicable, with the following exceptions.

#### Quality Control (QC) Information

#### Duplicate Relative Percent Difference (RPD) Statement

The Relative Percent Difference (RPD) between the sample and duplicate falls outside of the established acceptance limits because of the heterogeneous matrix of the sample:

Analyte	Sample	Value
Total Dissolved Solids	1204454116 (CAAN-20-190542DUP)	11.2* (0%-5%)

Page 505 of 657 SDG: N3B-2020-488

#### **GEL LABORATORIES LLC**

2040 Savage Road Charleston SC 29407 - (843) 556-8171 - www.gel.com

#### **Certificate of Analysis**

Project:

Client ID:

N3BL00119

N3BL001

Report Date: December 20, 2019

Company: Address:

N3B-Los Alamos

Bldg. 271, Embudo Rd Los Alamos National Laboratory Los Alamos, New Mexico 87544

Contact:

Mr. Sean Sandborgh

Project:

N3B

Sample ID:

Client Sample ID: CAMO-20-190669

498567002

Matrix:

W

Collect Date: Receive Date: 06-DEC-19 12:07

Collector:

10-DEC-19 Client

Parameter	Qualifier	Result	DL	RL	Units	PF	DF	Analy	st Date	Time	Batch	Method
Ion Chromatography												
WSP-ANIONS "As Re	eceived"											
Bromide	J	0.068	0.067	0.200	mg/L		1	JLDI	12/10/19	1432	1947474	- 1
Chloride		4.88	0.067	0.200	mg/L		1					
Fluoride		0.349	0.033	0.100	mg/L		ı					
Sulfate		6.98	0.133	0.400	mg/L		1					
Nutrient Analysis												
NH3 "As Received"												
Nitrogen, Ammonia	J	0.0214	0.017	0.050	mg/L	1.00	1	KLPI	12/12/19	1252	1949528	2
NO3NO2 "As Receive	ed"											
Nitrogen, Nitrate/Nitrite		2.47	0.170	0.500	mg/L		10	AXH3	12/16/19	0535	1948910	3
PO4 "As Received"												
Phosphorus, Total as P	J	0.0238	0.020	0.050	mg/L	1.00	1	KLPI	12/16/19	1638	1950182	4
Solids Analysis					100							
TDS "As Received"												
Total Dissolved Solids		201	3.40	14.3	mg/L			KLPI	12/12/19	1537	1949668	5
Titration and Ion Analy	vsis											
EPA 310.1 Total Alkal		As Received"										
Alkalinity, Total as CaCO3		64.8	1.45	4.00	mg/L			RXB5	12/12/19	1725	1946273	6
Carbonate alkalinity (CaCO:	3) U	ND	1.45	4.00	mg/L			IOLDS	12:12:17	1,23	1740213	
EPA120.1 Specific Co	nductivity "As	Received"										
Conductivity		152	1.00	1.00	umhos/cm		1	HXCI	12/13/19	1543	1949024	7
PH "As Received"												
pH at Temp 15.1C	н	7.97	0.010	0.100	SU		1	RXB5	12/12/19	1723	1946281	8
The following Prep Me	ethods were pe	erformed:										
Method	Description	ì		Analyst	Date	Т	ìme	Pre	p Batch			
EPA 350.1 Prep	EPA 350.1 At	nmonia Nitrogen Prep		AXH3	12/12/19	0	735	194	9527		is.	
EPA 365.4 Prep	EPA 365.4 Ph	osphorus, Total in liquid PR	1	KLP1	12/16/19	1	430	195	0181			

Page 512 of 657 SDG: N3B-2020-488

#### **GEL LABORATORIES LLC**

2040 Savage Road Charleston SC 29407 - (843) 556-8171 - www.gel.com

#### **Certificate of Analysis**

Report Date: December 20, 2019

N3BL00119

N3BL001

Project:

Client ID:

Company : Address :

N3B-Los Alamos

Bldg. 271, Embudo Rd Los Alamos National Laboratory Los Alamos, New Mexico 87544

Contact:

Mr. Sean Sandborgh

Project:

N3B

Sample ID: Matrix:

Client Sample ID: CAMO-20-190675 498567005

W

Collect Date:

06-DEC-19 14:17 10-DEC-19

Receive Date: Collector:

Client

Parameter	Qualifier	Result	DL	RL	Units	PF :	DF	Analy	st Date	Time	Batch	Method
Ion Chromatography												
WSP-ANIONS "As Rec	eived"											
Bromide	J	0.0872	0.067	0.200	mg/L		1	JLD1	12/10/19	1533	1947474	1
Chloride		5.08	0.067	0.200	mg/L		1					
Fluoride		0.329	0.033	0.100	mg/L		1					
Sulfate		6.08	0.133	0.400	mg/L		1					
Nutrient Analysis												
NH3 "As Received"												
Nitrogen, Ammonia	U	ND	0.017	0.050	mg/L	1.00	1	KLPI	12/12/19	1255	1949528	2
NO3NO2 "As Received"	•											
Nitrogen, Nitrate/Nitrite		0.985	0.085	0.250	mg/L		5	AXH3	12/16/19	0538	1948910	3
PO4 "As Received"												
Phosphorus, Total as P	J	0.0353	0.020	0.050	mg/L	1.00	1	KLPI	12/16/19	1638	1950182	4
Solids Analysis												
TDS "As Received"												
Total Dissolved Solids		197	3.40	14.3	mg/L			KLPI	12/12/19	1537	1949668	5
Titration and Ion Analys	is											
EPA 310.1 Total Alkalin	ity +CO3 "A	As Received"										
Alkalinity, Total as CaCO3		73.5	1.45	4.00	mg/L			RXB5	12/12/19	1726	1946273	6
Carbonate alkalinity (CaCO3)	U	ND	1.45	4.00	mg/L							
EPA120.1 Specific Cond	ductivity "As	Received"										
Conductivity	-	154	1.00	1.00	umhos/cm		1	HXCI	12/13/19	1543	1949024	7
PH "As Received"												
pH at Temp 16.0C	Н	8.14	0.010	0.100	su		1	RXB5	12/12/19	1725	1946281	8
The following Prep Metl	hods were pe	rformed:										
Method	Description			Analyst	Date	T	ime	Prep Batch				
EPA 350.1 Prep	EPA 350.1 An		AXH3	12/12/19		0735 1949527						
EPA 365.4 Prep	EPA 365.4 Phosphorus, Total in liquid PR			KLP1	12/16/19		130		0181			

Page 516 of 657 SDG: N3B-2020-488

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### **QC Summary**

Workorder: 498567				-	<u> </u>		<del>- 1</del>					Page 4 of
Parmname		NO	M	Sample	Qual	QC	Units	RPD%	REC%	Range	Anlst	Date Time
Nutrient Analysis Batch 1950182 QC1204455066 498581002 Phosphorus, Total as P	MS	1.00	U	ND		1.01	mg/L		99.2	(70%-136%)	KLPI	12/16/19 16:41
Batch 1950191												
QC1204455114 498581002 Nitrogen, Total Kjeldahl	DUP		U	ND	υ	ND	mg/L	N/A			KLPI	12/16/19 15:07
QC1204455113 LCS Nitrogen, Total Kjeldahl		1.00				0.997	mg/L		99.7	(90%-110%)		12/16/19 15:01
QC1204455112 MB Nitrogen, Total Kjeldahl					J	0.0339	mg/L					12/16/19 15:00
QC1204455117 498581002 Nitrogen, Total Kjeldahl	MS	1.00	U	ND		0.977	mg/L		97.7	(90%-110%)		12/16/19 15:08
Solids Analysis Batch 1949668												
QC1204454116 498423006 Fotal Dissolved Solids	DUP			169		189	mg/L	11.2*		(0%-5%)	KLPI	12/12/19 15:37
QC1204454113 LCS Total Dissolved Solids		300				300	mg/L		100	(95%-105%)		12/12/19 15:37
QC1204454112 MB Total Dissolved Solids				*:	υ	ND	mg/L					12/12/19 15:37
Fitration and Ion Analysis Batch 1946273	P					3.65 -	245					
QC1204449343 498037002 Alkalinity, Total as CaCO3	DUP			63.6		64.0	mg/L	0.623		(0%-20%)	RXB5	12/12/19 16:44
Carbonate alkalinity (CaCO3)			U	ND	U	ND	mg/L	N/A				

Page 523 of 657 SDG: N3B-2020-488

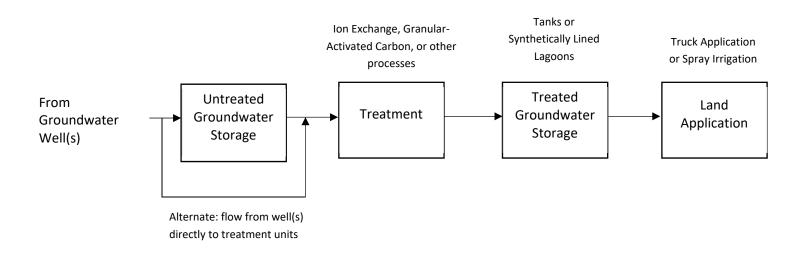
## ATTACHMENT B Facility Location

Item Number	Dango	Township	Section(c)
	Range	Township	Section(s)
1	R05E	T19N	S25
2	R05E	T19N	S36
3	R06E	Y18N	S1 S2
4	R06E	T18N	
5	R06E	T18N	S3
6	R06E	T18N	S4
7	R06E	T18N	S10
8	R06E	T18N	S11
9	R06E	T18N	S12
10	R06E	T18N	S13
11	R06E	T18N	S14
12	R06E	T18N	S24
13	R06E	T18N	S25
14	R06E	T19N	S13
15	R06E	T19N	S14
16	R06E	T19N	S15
17	R06E	T19N	S16
18	R06E	T19N	S17
19	R06E	T19N	S18
20	R06E	T19N	S19
21	R06E	T19N	S20
22	R06E	T19N	S21
23	R06E	T19N	S22
24	R06E	T19N	S23
25	R06E	T19N	S24
26	R06E	T19N	S25
27	R06E	T19N	S26
28	R06E	T19N	S27
29	R06E	T19N	S28
30	R06E	T19N	S29
31	R06E	T19N	S30
32	R06E	T19N	S31
33	R06E	T19N	S32
34	R06E	T19N	S33
35	R06E	T19N	S34
36	R06E	T19N	S35
37	R06E	T19N	S36
38	R07E	T18N	S5
39	R07E	T18N	S6
40	R07E	T18N	S7
41	R07E	T18N	S8
42	R07E	T18N	S16
43	R07E	T18N	S17
44	R07E	T18N	S18
45	R07E	T18N	S19
46	R07E	T18N	S20
47	R07E	T18N	S21
48	R07E	T18N	S29
49	R07E	T18N	S30
50	R07E	T19N	S17
51	R07E	T19N	S18
52	R07E	T19N	S19
53	R07E	T19N	S20
54	R07E	T19N	S31
55	R07E	T19N	S32

The U.S. Department of Energy (DOE) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) acknowledge that activities covered by this discharge permit application may potentially be conducted anywhere within the 36 square-mile Los Alamos National Laboratory site. DOE/N3B propose to include all 55 sections in the table above as possible locations where components for the processing, treatment, storage, and/or land application may need to be located. Specific component identification information will be provided in a project-specific work plan provided to the New Mexico Environment Department (NMED). Project-specific work plans will be provided to NMED for review and approval at least 60 days before the commencement of any of the activities described in the work plan.

### ATTACHMENT C Processing, Treatment, Storage, and Disposal System

Below is a generalized process flow diagram for the storage, treatment, and land application of groundwater for activities conducted under this discharge permit application.



EM2020-0004 11

### ATTACHMENT D Identify Other Wastewater or Storm Water Discharges at the Facility

Discharge Type*	Permit Identification
Individual Storm Water Permit	National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759
Construction Storm Water Permits	Each construction project disturbing more than 1 acre
Technical Area 54 (TA-54) Maintenance Facility West Multi-Sector General Permit (MSGP)	NPDES Permit No. NMR050011
TA-54 Areas G and L MSGP	NPDES Permit No. NMR050012

<sup>\*</sup> Only storm water discharges for Newport News Nuclear BWXT-Los Alamos, LLC (N3B), activities are identified.N3B does not manage any wastewater discharges.

## ATTACHMENT E Description of Components

Component*	Description (construction material, liner type, irrigation method, capacity, dimensions, area, model number, etc.)
Influent (untreated groundwater) storage tank	Steel frac tank. See Attachment F.
Influent (untreated groundwater) storage tank	Lined modular tank. See Attachment F.
Influent (untreated groundwater) storage lagoon	Synthetically lined lagoon. See Attachment F.
Treatment system feed pump	Delivers untreated groundwater from tank or lagoon to treatment unit.
Treatment unit	Treatment unit to remove contaminants > groundwater standards (e.g., ion exchange, granular-activated carbon)
Effluent (treated groundwater) storage tank	Steel frac tank. See Attachment F.
Effluent (treated groundwater) storage tank	Lined modular tank. See Attachment F.
Effluent (treated groundwater) storage lagoon	Synthetically lined lagoon. See Attachment F.
Effluent (treated groundwater) transfer pump	Transfers treated groundwater to water truck or spay irrigation.
Water truck	Water truck with sprayers for land application
Spray irrigation system	Pump, valves, piping, and spray nozzles for land application

<sup>\*</sup> Components are listed singularly. Specific component identification and configuration information will be provided in a project-specific work plan to the New Mexico Environment Department.

#### ATTACHMENT F

#### Design Criteria for Storage Systems (Lagoons, Lined Modular Tanks, and Steel Tanks)

Design requirements for lining of the aquifer test storage systems are as follows:

#### Lagoons:

- 1. Suitable liner materials are identified in the Natural Resources Conservation Service (NRCS) Conservation Practice Standard No. Code 521A Pond Sealing or Lining Flexible Membrane.
- Influent liner material shall be 36 mil flexible reinforced polypropylene geomembrane such as supplied by Colorado Lining International.
- 3. Effluent liner material shall be 24 mil (minimum) reinforced polyethylene geomembrane (pond liner) such as supplied by Colorado Lining International.
- 4. Lagoons shall have a design life of 5 years.
- 5. Subgrade shall consist of native silty sand alluvial soils essentially free of angular stones over 3/8 inch and prepared by smoothing.
- 6. Maximum lagoon slope: 1.5 horizontal to 1 vertical, and one slope per lagoon shall be no steeper than 3 horizontal to 1 vertical for access/egress.
- 7. The minimum berm width shall be 5 feet.
- 8. Lagoons will be monitored for water loss.
- 9. Each lagoon may have a maximum capacity of 200,000 gallons.
- 10. Lagoons will be fenced to prevent animal intrusion.
- 11. No penetrations of the liner shall be allowed.
- 12. No vehicles shall be used on the top-slopes of the berms.
- 13. Liners shall be installed per manufacturer's requirements.
- 14. Lagoons shall be sized such that field seaming is not required.
- 15. Entry into the lagoons shall be allowed only for maintenance, sampling, and operational activities.
- 16. Anchor trench shall be designed to support the entire weight of the side-slope liner.
- 17. A 2-foot freeboard shall be maintained.

#### <u>Lined Modular Influent Tanks (such as provided by Modutank):</u>

- Field erected, abovegrade, lined modular tanks (e.g., Modutank, see link below) may be used for influent and effluent storage, possibly in combination with other storage types. An 8-ounce geotextile will be placed under the line as a ground cover. <a href="https://modutank.com/modutank/">https://modutank.com/modutank/</a>
- 2. Influent liner material shall be 36 mil flexible polypropylene geomembrane such as supplied by Colorado Lining International.
- 3. Effluent liner material shall be 24 mil (minimum) polyethylene geomembrane (pond liner) such as supplied by Colorado Lining International.
- 4. Tanks will be monitored for water losses.

#### Steel Frac Tanks

- 1. Steel frac tanks may be used for influent raw water storage, possibly in combination with other storage types.
- 2. Steel frac tanks are fully enclosed tanks (i.e., closed) with a capacity of approximately 21,000 gallons.

### ATTACHMENT G Flow Metering

Specific flow metering system information for measuring the volume entering the treatment system and the discharge volume will be provided in a project-specific work plan provided to the New Mexico Environment Department.

# ATTACHMENT H Discharge Quality

	Contaminants				
Contaminants	Incoming (Influent)	Final (Effluent)			
>20.6.2.3103 New Mexico Administrative Code (NMAC) groundwater standards	Untreated groundwater quality information will be provided in project-specific work plans, if required. In accordance with Part II.4 of the discharge permit application, not all facilities need to characterize influent quality.	<90% of 20.6.2.3103 NMAC groundwater standards			
20.6.2.7.T(2) NMAC Toxic Pollutants >Table A-1, New Mexico Environment Department (NMED) Risk Assessment Guidance Soil Screening Levels (SSLs) for Tap Water	Untreated groundwater quality information will be provided in project-specific work plans, if required. In accordance with Part II.4 of the discharge permit application, not all facilities need to characterize influent quality.	<90% of Table A-1, NMED Risk Assessment Guidance SSLs for Tap Water			

### ATTACHMENT I Groundwater Flow Direction

The general groundwater flow direction at Los Alamos National Laboratory is to the southeast. Specific groundwater contour maps from on-site monitoring wells, when available, will be provided in a project-specific work plan provided to the New Mexico Environment Department.

### ATTACHMENT J Monitoring Well Construction and Identification

Construction logs and location information for all applicable project-specific on-site monitoring wells including the date of installation and well drilling will be provided in a project-specific work plan to the New Mexico Environment Department.