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Governor

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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Ground Water Quality Bureau

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

December 5, 2019

Elizabeth Lowes, Program Manager
Environmental, Safety and Health
N3B-Los Alamos
1200 Trinity Drive, Suite 150
Los Alamos, NM 87544

Cheryl L. Rodriguez, Program Manager, FPD-II
Environmental Management
Los Alamos Field Office
P.O. Box 1663, MS M984
Los Alamos, NM 87545

RE: Response to Notice of Intent to Discharge; Discharge Permit Not Required for Los Alamos National Laboratory, AI-856

Dear Ms. Lowes and Ms. Rodriguez:

The Ground Water Quality Bureau (GWQB) of the New Mexico Environment Department (NMED) received a Notice of Intent (NOI) from you on November 7, 2019 regarding the proposed discharge of extracted groundwater or potable water mixed with sodium 1,5-naphthalene disulfonate tracer into monitoring wells R-42 and R-28 in the chromium project area at Los Alamos National Laboratory. The proposed discharge is located approximately 3 miles southeast of Los Alamos, in Section 24, Township 19N, Range 6E, Los Alamos County.

The notice satisfies the requirements of Subsection B of 20.6.2.1201 NMAC, Ground and Surface Water Protection Regulations, (20.6.2 NMAC).

The proposed discharge is briefly described as follows:

The NOI describes the tracer study as an aquifer test to estimate the volumetric flow rate(s) of groundwater passing through the screened intervals of monitoring wells R-42 and R-28. The volumetric flow rate estimates will be compared with previous estimates obtained from borehole dilution tracer tests conducted in R-42 and R-28 in 2014. Extracted groundwater from each well or potable water from the Los Alamos County municipal supply will be mixed with tracer before deployment into the wells.

A total of 350 gallons of extracted groundwater or potable water will be mixed with up to 5 grams of sodium 1,5-naphthalene disulfonate tracer in a tank at each well location. The tracer solution(s) will then be separately deployed into R-42 and R-28 through transducer tubes installed in each well, while extracting groundwater at the same rate as the injection rate. The extracted groundwater will be collected into on-site purge water containers. The tracer injections will be stopped when the tracer concentration in the return line from each well is steady and approximately the same as in the respective tracer makeup/mixing tank.

Based on the information provided in your NOI, NMED has determined that a Discharge Permit is not required as long as the discharge is as described. A Discharge Permit is not required at this time because the information provided indicates it is unlikely that the discharge will adversely affect ground water quality.

Although a Discharge Permit is not being required for this discharge at this time, you are not relieved of liability should your operation result in actual pollution of surface or ground waters. Further, this decision by NMED does not relieve you of your responsibility to comply with any other applicable federal, state, and/or local laws and regulations, zoning requirements, plumbing codes, and nuisance ordinances.

If at some time in the future you intend to change the amount, character or location of your discharge, or if observation or monitoring shows that the discharge is not as described in your Notice of Intent, you must file a revised NOI with the GWQB.

If you have any questions, please contact either Andrew Romero at (505) 827-0076 or Steve Pullen, Program Manager of the Ground Water Pollution Prevention Section, at (505) 827-2962.

Sincerely,

A handwritten signature in black ink, appearing to be "MH", with a stylized flourish extending to the right.

Michelle Hunter, Chief
Ground Water Quality Bureau

MH:AR

cc: Steve Pullen, Program Manager
Robert Italiano, District Manager, NMED District II
Christian T. Maupin, N3B – Los Alamos (christian.maupin@em-la.doe.gov)
County File