



NEW MEXICO  
ENVIRONMENT DEPARTMENT



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lieutenant Governor

Ground Water Quality Bureau  
1190 St. Francis Drive / PO Box 5469  
Santa Fe, NM 87502-5469  
Phone (505) 827-2900 Fax (505) 827-2965  
[www.env.nm.gov](http://www.env.nm.gov)

**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

June 26, 2020

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 Alamo, 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 27, 2019 to perform well maintenance activities at extraction well CrEX-3 located at the Los Alamos National Laboratory (LANL). The proposed discharge is located at LANL Technical Area 05, approximately 3 miles southeast of Los Alamos, in Section 24, Township 19N, Range 6E, Los Alamos County.

The NOI 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 well maintenance activities to be conducted at extraction well CrEX-3 necessary to remove scale and biofilm deposits and to disinfect the well casing and filter pack around the screened interval. Three phases of well-rehabilitation maintenance will occur: (1) mechanical pre-treatment (e.g., brushing the well screen), (2) chemical rehabilitation using low concentration/volumes of phosphoric acid and biodispersant mixed with potable water, and (3) disinfection of the water column within the well bore and screened interval.

Chemical solutions will not be discharged during mechanical pre-treatment activities. During the chemical rehabilitation phase, 100 gallons of potable water will be blended with 15 gallons of NW-120 phosphoric acid at 75% strength and 5

gallons of NW-310 biodispersant. During the third phase, 400 gallons of potable water will be mixed with 1 gallon of sodium hypochlorite (12%) and 0.5 gallons of NW-410 chlorine enhancer.

Discharges at CrEX-3 will involve the introduction of 500 gallons of well-rehabilitation chemical solutions mixed with potable water and followed by well purging at volumes sufficient to remove >95% of the deployed solutions. All water purged from CrEX-3 during this rehabilitation effort will be managed in accordance with its waste classification and dispositioned accordingly.

NMED has determined that a Discharge Permit is not required based on the information provided in your NOI and as long as the discharge is performed 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 groundwater 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 groundwaters. 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 NOI, you must file a revised NOI with the GWQB.

This approval is pursuant to WQCC Regulation 20.6.2.3106.B NMAC, and the NMED Delegation Order dated January 15, 2020, through which the Cabinet Secretary has delegated this authority to sign responses to a Notice of Intent to discharge to the Chief of the GWQB.

NMED is taking all necessary precautions to reduce the spread of COVID-19. Given the current public health emergency, all field work and permit required activities must be conducted in accordance with the Governor's current Executive Orders and Public Health Orders. Please help to keep New Mexicans safe by visiting the New Mexico Department of Health's website to learn how you can play a role in stopping the spread of COVID-19. That website is [cv.nmhealth.org](http://cv.nmhealth.org). If you believe the current COVID-19 restrictions impact your ability to safely complete one or more permit required tasks, please include this information with your submittals.

Elizabeth Lowes and Cheryl Rodriguez, AI:856

June 26, 2020

Page 3 of 3

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,

**Steve Pullen** Digitally signed by Steve Pullen  
Date: 2020.06.26 14:42:36 -06'00'

(for) Michelle Hunter, Chief  
Ground Water Quality Bureau

MH:AR

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