



Los Alamos

NATIONAL LABORATORY

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Date: March 10, 1999
In Reply Refer To: ESH-18/WQ&H:99-0072
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**SUBJECT: NPDES PERMIT RE-APPLICATION (NM0028355)
RESPONSE TO NMED/SWQB REVIEW COMMENTS**

Dear Mr. Saums:

Staff from the Laboratory's Water Quality and Hydrology Group (ESH-18) have completed a review of the comments provided by the New Mexico Environment Department, Surface Water Quality Bureau (NMED-SWQB), in your letter dated February 2, 1999 (Attachment 1), regarding the Laboratory's NPDES Permit Re-Application. Enclosed is the Laboratory's detailed response to the NMED-SWQB's questions and requests for information.

The NPDES Permit Application Instructions provided by the U.S. Environmental Protection Agency (EPA) are very specific regarding the information requested and the format in which the information must be provided in the Permit Re-Application. In accordance with these instructions, the Laboratory prepared a very comprehensive and detailed Re-Application document which is contained in three large notebooks. The Laboratory received a letter dated August 31, 1998, from the EPA indicating that the Laboratory's Re-Application for an NPDES Permit had been received, reviewed, and had been determined to be "administratively complete" in accordance with the EPA's Environmental Permit Regulations (Attachment 2).

The enclosed response addresses each of the comments in your February 2, 1999 letter and should be helpful in completing your review of the Laboratory's Re-Application. Individual responses were developed in order to provide additional information or to identify the location of information previously provided in the Laboratory's NPDES Permit Re-Application document and in follow-up supplements. Fourteen additional documents are also enclosed for your review. (Please see the Listing of Enclosures)

**RESPONSE TO NMED-SWQB REVIEW OF COMMENTS
NPDES PERMIT RE-APPLICATION (NM0028355)**

LISTING OF ENCLOSURES

- Enclosure 1: Master List of Permitted Septic Systems (Updated Appendix O, March 10, 1999)
- Enclosure 2: Sanitary Utility Mapping (Updated Appendix L, February 25, 1999)
- Enclosure 3: Listing of Discharge Sources to the TA-21 Transfer Station
- Enclosure 4: Listing of RCRA-Permitted and Interim Status Sites
- Enclosure 5: Engineering Schematics of TA-46 SWSC Effluent Holding Pond (Structure 346 and 349) and Effluent Holding Pond, Overflow Control Box Plan and Section (Structure 346)
- Enclosure 6: Waste Acceptance Criteria (WAC) for the TA-16 HEWTF
- Enclosure 7: December 22, 1998, letter from Chris Ortega, Utility Manager, Los Alamos County, to William B. Hathaway, Director, EPA Region 6
- Enclosure 8: January 11, 1999, letter from Jack V. Ferguson, P.E., Chief, NPDES Permits Branch, EPA Region 6, to David Gurule, Area Manager, DOE Los Alamos
- Enclosure 9: February 22, 1999, letter (LAAME:3JV-017) from Joseph C. Vozella, Assistant Area Manager, Office of the Environment, DOE Los Alamos, to Joseph C. King, County Administrator, Incorporated County of Los Alamos
- Enclosure 10: 1996 Ground Water Discharge Plan (DP-1052) Report for the Land Application of Sanitary Sludge
- Enclosure 11: 1997 Ground Water Discharge Plan (DP-1052) Report for the Land Application of Sanitary Sludge
- Enclosure 12: 1998 Ground Water Discharge Plan (DP-1052) Report for the Land Application of Sanitary Sludge
- Enclosure 13: Testing Results of Sludge, Grit, and Screenings for 1997 and 1998
- Enclosure 14: May 22, 1998, letter (LAAME:6BK-010) from Joseph C. Vozella, Assistant Manager, Office of the Environment, DOE Los Alamos, to Robert S. (Stu) Dinwiddie, Ph.D., Manager, RCRA Permits Management Program, New Mexico Environment Department

**RESPONSE TO NMED-SWQB REVIEW COMMENTS
NPDES PERMIT RE-APPLICATION (NM0028355)**

1. Septic Tanks/Holding Tanks and Sumps

- Appendix O contains a list of Septic/Holding Tanks. However, it is not clear whether this list is complete. (e.g. no sumps are included). Appendix O also does not identify the exact location or number of the septic/holding tanks and sumps, nor does it contain the pumping schedule associated with these structures. In addition, a discussion concerning the relevance (e.g. do the tanks, sumps, and TA-21 meet the WAC for volume pumped and constituents of concern such as hazard and radioactive waste) and rationale for continuing to use these septic/holding tanks, and sumps. Also, a description of how they relate to the SWSC plant would be helpful.

Provided as Enclosure 1 is the current list of septic/holding tanks at the Laboratory. We have also included a new septic/holding tank map (Enclosure 2). Many buildings at the Laboratory have small sump/lift stations connected to the SWSC collection system and are not individually listed in Appendix O of the Laboratory's NPDES Re-Application, as permitting is not required for this ancillary equipment. All sanitary septic/holding tanks were listed in Appendix O and categorized by Technical Areas (TA) and structure number. The septic/holding tanks are checked regularly and are pumped on an as-needed basis. The daily flow rate from the septic/holding tanks is 331 gallons per day and was provided in the NPDES Permit Re-Application Supplement 2, dated January 20, 1999. Additionally, individual septic/holding tanks have been permitted under the New Mexico Liquid Waste Disposal Regulations (20 NMAC 7.3). Pumping records for holding tanks are submitted to NMED District II once every six months. The Laboratory will add NMED-SWQB to the distribution list upon request.

All sanitary septic tank owners must complete a Waste Profile Form (WPF) and the waste be approved pursuant to the Waste Acceptance Criteria (WAC) for treatment at the TA-46 SWSC Plant. These requirements and guidance are outlined in the Laboratory's Implementation Requirement (LIR 404-00-01.2) and Laboratory Implementing Guidance Document (LIG 404-00-03.0). These documents were hand delivered to NMED-SWQB on February 9, 1999, under Supplement 2 of the NPDES Permit Re-Application.

- TA-21, an old wastewater treatment plant, is being used as a holding tank, but is not listed in Appendix O. Does this omission indicate that the use of TA-21 will be terminated? If it was meant to be included as part of the application, please include a discussion of its intended use (e.g., list buildings discharging to TA-21). Also, list appropriate information about it on the Appendix O and Appendix L maps.

The old TA-21 Sewage Treatment Plant (NPDES Outfall 05S) is referred to as the "TA-21 Transfer Station" on the Laboratory's revised septic/holding tank map. The TA-21 Transfer Station will continue to be used until demolition activities at TA-21 are completed. In a telephone conversation on February 19, 1999, Mr. Courte Voorhees, NMED District II, indicated that as long as this structure is part of the

SWSC collection system, permitting as a septic tank or holding tank was not necessary. Additionally, Mr. Voorhees indicated that this structure represented a transfer station and he did not consider it a septic or holding tank. Therefore, Appendix O of the Laboratory's NPDES Permit Re-Application which lists active and inactive septic and holding tanks at the Laboratory did not include the TA-21 Transfer Station.

Facilities at the TA-21 DP Site have been closed and are undergoing decontamination and decommissioning with the exception of a few isolated buildings. A map and list of buildings currently occupied and discharging to the TA-21 Transfer Station is provided as Enclosure 3.

- The Appendix L map does not reflect the location of the 48 septic/holding tank, 42 lift stations, and sumps. This information would be helpful. Also, this map (Appendix L) still indicates TA-21 as an operational wastewater treatment plant. Please include the current status of TA-21 on the map.

Enclosed is a copy of the revised list of septic/holding tanks at the Laboratory (Enclosure 1). The list includes TA and structure number. We have also included a new septic/holding tank map (Enclosure 2).

- Identify all sumps associated with outfalls that receive storm water.

NPDES outfalls that receive storm water are listed in Appendix C of the Laboratory's NPDES Permit Re-Application. Additionally, storm water contributions were included on the Form 2C and 2D, if applicable. Additionally, on May 23, 1996, the Laboratory submitted a Notice of Planned Change for NPDES Outfalls 05A053, 05A058, 05A066, 05A067, and 05A068, regarding the plugging of the high explosives (HE) sumps. The notification documented that only storm water from roof drains would continue to discharge through the eliminated HE outfalls. A copy of this notification was provided to NMED-SWQB and also included in the NPDES Permit Re-Application.

2. Flow and Impact to RCRA (PRS's)

- Please include on the revised map of the outfalls (Appendix F), all SWMU's located above and below the outfalls proposed for permit status. Also indicate on this map which outfalls receive storm water flow directly, or through collection systems (such as sumps) and at what volumes.

The Laboratory did not include this information in the original NPDES Permit Re-Application, dated May 4, 1998, because it is not required by EPA. However, the Water Quality & Hydrology Group (ESH-18) is working with personnel from the Laboratory's Facilities for Information Management, Analysis, and Display Group (FIMAD) to develop an additional map for your review. The Laboratory will provide you with copy of the new map when it becomes available in approximately 30 days.

The Laboratory provided a listing of all active and deleted NPDES outfalls, and identified which outfalls receive storm water directly in the NPDES Permit Re-Application Form 2Cs and 2Ds and in Appendix C of the NPDES Permit Re-Application, dated May 4, 1998.

- Appendix T is a map that indicates all RCRA permitted sites. Please define which of these sites are currently classified as RCRA interim status sites? Also, indicate on this map any NPDES outfalls associated with these designated RCRA sites.

Per your request for additional information, we have enclosed a listing of RCRA permitted and interim status sites at the Laboratory, as of February 12, 1999 (Enclosure 4). RCRA interim status site delineation is not a requirement of the NPDES Permit Application process. Therefore, this information was not provided in the Laboratory's NPDES Permit Re-Application dated May 4, 1998.

NPDES outfalls that are directly or indirectly associated with interim or permitted RCRA facilities include the following:

- (1) TA-16-387, 388, 399, 394, 401, 406 Open Burn; Outfall 05A055 (directly associated)
- (2) TA-50-60A Treatment, Outfall 051 (directly associated)
- (3) TA-3-29-9010, 9020, 9030 Storage, Outfall 03A021 (indirectly associated)

- The reapplication indicates some outfalls receive high amounts of flow (e.g., 001 and 051). High amounts of flow from outfalls may be causing erosion and/or impacting RCRA SWMUs located downstream. NMED-SWQB requests LANL address this issue by discussing with all facility managers utilizing outfalls, the importance of managing outfall flows through streamlining and/or modifying process management at the facility.

The impacts to surface water quality from Solid Waste Management Units (SWMUs) and Potential Release Sites (PRS) are being addressed under the Laboratory's NPDES Storm Water Multi-Sector General Permit No. NMR05A509. The Laboratory utilizes Administrative Procedure (AP) 4.5 to provide a systematic approach to identifying PRSs which have the potential to adversely impact surface water quality through surface water runoff, outfall discharges or other erosion processes. As part of the procedure, a Surface Water Site Assessment Team (SWAT) was established with representatives from the Laboratory's Environmental Restoration (ER) Project, Water Quality & Hydrology Group (ESH-18), DOE/Oversite Bureau, and LANL Facility Management. This effort has also been coordinated with representatives from the NMED-SWQB. The SWAT role is to provide recommendations from the AP 4.5 findings for the installation of Best Management Practices (BMPs) that may be needed to address erosion at PRSs. These recommendations are then provided to the ER Project and Facility Management for their evaluation. These findings may require that the Storm Water Pollution Prevention Plans be amended and corrective actions completed by Facility Management. Your concerns regarding high amounts of flow from certain outfalls will be forwarded to the SWAT for evaluation.

- DMR reports for NPDES outfall 051 indicates that problems may be occurring with the Total Toxic Organics (TTO) (e.g., results of 2 of 111 contributors to TTO were qualified as estimated under laboratory QA/QC methods). It is not clear as to what this means (e.g., which 2 of 111 contributors are involved). In addition, identify the laboratory used and explain what is meant by "estimated under laboratory QA/QC." NMED also asks that LANL begin reporting which constituents are elevated when TTO is qualified as estimated under laboratory QA/QC methods.

Monitoring and testing for Total Toxic Organics (TTOs) is required by the Laboratory's NPDES Permit No. NM0028355 for Outfall 051, as defined by 40 CFR 433.11(e). The list of TTO's "organic constituents" are also located on Form 2C, Part C of the NPDES Permit Re-Application. Individual TTO values are not required to be submitted with the NPDES Permit Re-Application.

NPDES compliance samples collected for TTO analysis at NPDES Outfall 051 are submitted to KEMRON Environmental Services, located in Marietta, Ohio, at a frequency of once per month. Samples collected for the NPDES Permit Re-Application were analyzed by Assaigai Analytical Laboratories, located in Albuquerque, New Mexico.

Analytical laboratories used by the Laboratory are required to follow EPA approved analytical methods and protocols. Data is validated by the Laboratory's Analytical Chemistry Group (NMT-1). Group ESH-18 reports the TTO compliance data to EPA and NMED on the monthly Discharge Monitoring Reports (DMRs), as required by the NPDES Permit. The Laboratory is required to report only the summation of all the organic constituents in the TTO test on the Laboratory's DMR. Group ESH-18 uses the comment section of the DMR to report any "data qualifiers" noted during data validation. Per your request, the Laboratory will provide additional information on the data qualifiers on the DMRs.

- Barbara Hoditschek, on the tour of TA-50 conducted on October 29, 1998, was told that Investigative Derived Waste (IDW) was being received at TA-50. A notice of change of condition for outfall 051 reflects this change however, was not received or found in the reapplication. Please provide NMED-SWQB with a copy of this change of condition.

The Laboratory submitted a Notice of Changed Condition to EPA and NMED-SWQB regarding the IDW wastes discharging to the TA-50 Radioactive Liquid Wastewater Treatment Facility (RLWTF) on July 3, 1997. This information was also included in the Appendix Q, Attachment 8 of the NPDES Permit Re-Application, dated May 4, 1998. This information was re-submitted to EPA and NMED on January 20, 1999 (LANL Memorandum ESH-DO:99-10).

3. 13S Outfall Issues

- During NMED's site visit with Scott Wilson of EPA, a liquid of unknown source and quantity was observed in the outfall 13S (a) sump. NMED had been informed during regular NPDES inspections that this outfall was not in use. It was obvious, however, from observation of the residual deposits above the drain line that the liquid in the sump had

discharged through the sump drain and out the 13S (a) outfall. Please explain how future discharges will be prevented and/or eliminated. If 13S (a) is intended to be used, please submit a change to the reapplication.

The Laboratory is required to collect compliance samples at NPDES Outfall 13S, as documented on Page 15 of Part I of the NPDES Permit No. NM0028355. NPDES Outfall 13S is located at the parshall flume after the TA-46 SWSC Chlorine Contact Chamber (Latitude 35° 51' 8", Longitude 106° 16' 33"). Group ESH-18 submitted to EPA a NPDES Permit Re-Application Form 2C for NPDES Outfall 13S on May 4, 1998. NPDES Outfall 13S was also included in Appendix F of the Re-Application, which provided a topographical map, depicting outfalls located within the Laboratory's boundaries. The parshall flume (NPDES Outfall 13S) does not directly discharge to the environment but is diverted to other discharge locations cited in the NPDES Permit. NPDES Outfall 13S indirectly discharges to the environment at the following locations: (1) Below the TA-46 SWSC Plant into Canada del Buey (Latitude 35° 51' 7", Longitude 106° 16' 27"); (2) Old NPDES Outfall 01S (Latitude 35° 52' 29", Longitude 106° 18' 38"); and, (3) NPDES Outfall 001 and other Category 03A outfalls. On the map, Group ESH-18 labeled the discharges to the environment (Numbers 1 and 2) as 13S(b) and 13S(a), respectively. The 13S(a) and 13S(b) labels were used on the map as "location identifiers" only. The Laboratory does not intend to permit these discharges separately.

Treated effluent has never been released at the 13S(b) discharge point. The sump overflow pipe is plugged at the TA-46 SWSC Plant. A copy of the holding pond engineering design was provided to NMED-SWQB shortly after the October, 1998, EPA visit. A copy of the engineering drawing is included for your review (Enclosure 5). The liquid in question was storm water that had apparently seeped/infiltrated into the small, unsealed basin at 13S(b) discharge point. The residual deposits mentioned above were in fact small styrofoam pellets, apparently wind blown into the unsealed basin. The styrofoam pellets originated from insulation sheeting used in the remodel of one the buildings at the SWSC Plant. SWSC Plant operators collected fecal and nitrate samples from the unsealed basin. The fecal result was 8 cfu/100 ml, and the nitrate result was 1.7 mg/l. The presence of styrofoam, the low nitrate, and the presence of several fecal coliform bacteria, typical of dirty water, confirmed the assertion that the water is accumulated rainfall, rather than effluent.

- According to Mike Saladen, the 13S (b) outfall had been removed from the permit, but has not yet been plugged. Please indicate if and when it will be plugged. Also, please list any other NPDES outfalls that have been removed from the permit, but not plugged. Attach any schedule that may relate to this issue.

The 13S(a) discharge point which is the old 01S was eliminated on December 10, 1998. The Laboratory provided written notification to EPA and NMED-SWQB on January 20, 1999 (ESH-DO/99-10). A listing of other NPDES outfalls deleted from the NPDES Permit was provided as Appendix C of the NPDES Permit Re-Application. Many of these outfalls will not be plugged due to the continued discharge of storm water.

- The 13S outfall category is not clearly represented in the application. For example, a discrepancy exists regarding 13S, 13S (a), and 13S (b). Appendix F and Appendix C do not consistently reflect which outfalls exist. Also, the 13S (a) and 13S (b) outfalls are not listed as part of the application. Please modify and provide new information to the application which address these issues.

The Laboratory is required to collect compliance samples at NPDES Outfall 13S, as documented on Page 15 of Part I of the NPDES Permit No. NM0028355. NPDES Outfall 13S is located at the parshall flume after the TA-46 SWSC Chlorine Contact Chamber (Latitude 35° 51' 8", Longitude 106° 16' 33"). Group ESH-18 submitted a NPDES Permit Re-Application Form 2C for NPDES Outfall 13S to EPA on May 4, 1998. NPDES Outfall 13S was included in Appendix F, which provided a topographical map, depicting outfalls located within the Laboratory's boundaries. The parshall flume (NPDES Outfall 13S) does not directly discharge to the environment but is diverted to other locations cited in the NPDES Permit. NPDES Outfall 13S is diverted to the environment at the following locations: (1) Below the TA-46 SWSC Plant into Canada del Buey (Latitude 35° 51' 7", Longitude 106° 16' 27"); (2) Old NPDES Outfall 01S (Latitude 35° 52' 29", Longitude 106° 18' 38"); and, (3) NPDES Outfall 001 and other Category 03A outfalls. On the map, Group ESH-18 labeled the discharges to the environment (Numbers 1 and 2) as 13S(b) and 13S(a), respectively. The 13S(a) and 13S(b) labels were used on the map as "location identifiers" only. The Laboratory does not intend to permit these discharges separately and a modification to the re-application does not appear to be necessary. Additionally, 13S(a) has been eliminated.

4. Representative Sampling

- Please clarify in the application, how sampling at outfalls 13S and 001 would be representative sampling.

- **Sample Collection-General:**

Group ESH-18 followed the Form 2C Instructions, Item V. B. Sampling, which state in part: *"Any specific requirements contained in the applicable analytical methods should be followed for sample containers, sample preservation, holding times, the collection of duplicate samples, etc. The time when you sample should be representative of your normal operation, to the extent feasible, with all processes which contribute wastewater in normal operation, and with your treatment system operating with no system upsets. Samples should be collected from the center of the flow channel, where turbulence is at a maximum, at a site specified in your present permit, or at any site adequate for the collection of a representative sample."* The definition of representative sample can be found on Page 3 of Part II, Section C. 2. of the Laboratory's NPDES Permit No. NM0028355.

A Draft NPDES Permit Re-Application Project Implementation Plan (Implementation Plan), which included sampling protocol, was provided to NMED-SWQB and EPA for review and comment prior to the Laboratory submitting the NPDES Permit Re-Application. A detailed sampling plan was provided in Appendix

O of the Implementation Plan and as Appendix R in the re-application document. The final Implementation Plan was provided to EPA and NMED-SWQB on March 18, 1998 (Laboratory Memorandum ESH-18/WQ&H:98-0098).

Outfall 001: Page 2 of Part I of the Laboratory's current NPDES Permit states: *"Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Following the final treatment, prior to or at the point of discharge from outfall 001."*

Samples collected in support of the NPDES Permit Re-Application for Outfall 001 were collected at the parshall flume located below the TA-3 Power Plant (Outfall 001). This is the same location that NPDES compliance samples are collected, as required by the current NPDES Permit. The Laboratory collected a 24-hour composite sample and analyzed for all constituents listed in the Form 2C Re-Application for Outfall 001.

Outfall 13S: Page 15 of Part I, of the Laboratory's current NPDES Permit states: *"Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): Following the final treatment, prior to the point of discharge from the TA-46 SWSC Plant by gravity flow to Canada del Buey (Latitude 35° 51' 7" and Longitude 106° 16' 27"); and prior to the point of discharge from the TA-46 SWSC Plant into the effluent reuse line to Sandia Canyon (Latitude 35° 52' 29" and Longitude 106° 18' 38"); and to outfalls utilizing treated effluent as specified in Outfall 001 and Category 03A (*6)." Footnote (*6) states "Treated effluent from the SWSC plant shall be controlled utilizing Best Management Practices in such a manner as to enhance and maintain wetland areas in Sandia Canyon and Canada del Buey, and to minimize movement off site."*

Samples collected in support of the NPDES Permit Re-Application for Outfall 13S were collected at the parshall flume after the chlorine contact chamber prior to discharge into the reuse system (Outfall 13S). This is the same location that NPDES compliance samples are collected, as required by the NPDES Permit. The Laboratory collected a 24 hour composite sample and analyzed for all constituents listed in the Form 2C Re-Application for Outfall 13S.

Please note, sampling location language for Outfall 13S was drafted by EPA, in coordination with Laboratory and NMED-SWQB personnel. The August 1, 1994 NPDES Permit was certified by the NMED-SWQB. Additionally, the sampling location for NPDES Outfall 13S was required to be moved to the SWSC Plant as a result of the EPA Multi-Media Inspection conducted at the Laboratory in August 3-12, 1993.

5. LANL Internal Outfall Issues

- NMED-SWQB has seen several instances in the permit application which indicate potential internal outfalls may exist (e.g., effluent from TA-50, Room 60, is being blended into TA-50 effluent to be discharged to outfall 051). NMED considers internal outfalls as a source of potential future problems. Therefore, NMED-SWQB is requesting LANL

evaluate all proposed outfalls and clearly identify which may fall under "internal outfalls" as characterized according to 40 CFR (h) (1 and 2).

All outfalls at the Los Alamos National Laboratory are properly permitted and monitored, as required by the NPDES Permit No. NM0028355. Additionally, the Laboratory's NPDES Permit Re-Application and results of the Laboratory's Waste Stream Characterization Project does not document that any waste stream located from TA-50, Room 60 which is being blended to discharge at Outfall 051. Radioactive and industrial waste streams from the TA-55 Plutonium Facility are discharged into Room 60, at the TA-50 Radioactive Liquid Wastewater Treatment Facility (TA-50 RLWTF). The influent from TA-55 is sampled and is directed to the headworks of the TA-50 RLWTF. All effluent is treated through the wastewater treatment plant, re-sampled, and discharged to Outfall 051 when it meets NPDES Permit limits.

Please note that internal outfalls are defined by 40 CFR Part 122.45 (h) (1) and (2).

6. HE Plant

- Please provide NMED with a list and/or characterization of the HE/organic pollutants being introduced into the TA-16 Plant. NMED-SWQB also would like to have a copy of the WAC for this facility.

A list of potential pollutants of concern, and analytical data for the TA-16 High Explosives Wastewater Treatment Facility (TA-16 HEWTF) was submitted on the Form 2C, Table 2C3 and Table 2C4 of the NPDES Permit Re-Application. The Waste Acceptance Criteria (WAC) for the TA-16 HEWTF is included as Enclosure 6.

- During a site visit of LANL with Scott Wilson of EPA, Barbara Hoditschek was told that the old TA-16 plant was to remain in service as a "standby plant". NMED-SWQB requests information describing what factors would trigger the use of the old TA-16 plant as a "standby" plant. Will the effluent from the old plant be comparable in quality to that of the new plant? How and when will the effluent be tested when the old plant is used?

Factors which would trigger the use of the "old" TA-16 HEWTF as a back-up plant include, hydraulic overload, equipment failure or other such off normal conditions at the "new" TA-16 HEWTF. The two treatment plant processes are comparable except for the amount of effluent that can be treated at each facility. Increased filtration is available at the new TA-16 HEWTF. The effluent quality from each facility is comparable. All compliance samples for both facilities can be collected at NPDES Outfall 05A055, as required by the Laboratory's current NPDES Permit.

- In the application, Appendix V, page 2, 2nd paragraph, the following is stated, "The EA compares the impacts of the proposed action with those of continuing to operate the existing temporary wastewater treatment facility without making any modifications to HE operations or reducing HE wastewater discharges (the "no action" alternative). Under this alternative, it is anticipated that HE wastewater discharges would periodically violate

existing and future EPA discharge standards. Explain how LANL proposes to correct this situation at the old plant?

The Environmental Assessment was a driving force behind the construction of the "new" TA-16 HEWTF and the need to meet existing and future potential discharge standards. As stated in number 6 above, the "old" TA-16 HEWTF will be used only as a backup in emergency situations under reduced HE discharge conditions.

7. Outfalls not in use

- It was noted during a DMR review, that some outfalls have not been sampled for several years (e.g., 05A097, 03A-040, 03A-024, 03A-160, 04A-118 etc.). This seems to indicate they are also not being used. Please explain why no samples were taken, and why these outfalls should remain on the permit? Also identify any other outfalls which are not being used, but still remain on the application.

Following is a brief summary of the Laboratory's NPDES Outfall Reduction Program:

The Laboratory's 1990 Permit Re-Application contained information on 117 outfalls. By 1993, the Laboratory added 24 new outfalls for a total of 141. Since 1993, through several efforts including the Waste Stream Characterization Program and Corrections Project, construction of two new wastewater treatment facilities at TA-46 and TA-16, and most recently the NPDES Outfall Reduction Program, the Laboratory has deleted 107 outfalls from the existing NPDES Permit. These deleted outfalls are noted in Appendix C of the re-application document.

Under the NPDES Outfall Reduction Program, un-utilized, underutilized, and unnecessary outfalls are identified and targeted for elimination. The "target" outfalls cover all types of wastewater systems including, sanitary (Category S), radioactive (Category 051), and industrial. Industrial effluents include waste stream categories: 001 Power Plant; 02A Steam Plant; 03A Treated Cooling; 04A Once-through Cooling and Water Production Well Facilities; 05A High Explosives; 06A Photo Rinse Water; 07A Asphalt Plant; and, 128 Printed Circuit Board.

NPDES regulations and the Laboratory's current NPDES Permit required all "target" outfalls to be monitored and identified in the Discharge Monitoring Reports (DMRs) as long as the "target" outfalls are included under the current permit. In many cases, no effluent was discharged from these "target" outfalls during the established monitoring period due to no operational activity and, therefore, no samples could be collected. "No Discharge Verification Forms" were signed for these no-sample events by both the outfall contact and the person performing the compliance monitoring. These no-discharge forms are maintained at the Laboratory as part of the NPDES Permit compliance records.

As of January 11, 1999, 107 of the 121 targeted outfalls, have been eliminated from the NPDES Permit. The elimination of the remaining 14 outfalls by October, 1999, is

pending completion of physical construction and/or approval from EPA, and the concurrence of NMED. These 14 outfalls include: NPDES Outfall 03A045 located at TA-48-1, and 13 non-contact cooling water (Category 04A) outfalls associated with the Los Alamos Water Supply System.

Following completion of all scheduled outfall reduction activities, the Laboratory is expected to have 20 remaining outfalls in the NPDES Permit No. NM0028355. These 20 NPDES outfalls are currently permitted by EPA and will remain on the Laboratory's NPDES Permit as long as they are required.

The Laboratory has future plans to further reduce the number of permitted outfalls. Additional elimination of outfalls will be accomplished as a result of the long-term NPDES Outfall Reduction Program objectives which requires evaluation for continued outfall operation by the Laboratory Division Directors, Facility Managers, and/or outfall owners. Outfall owners will also be required to develop designs and plant modifications which provide for "reduced" or "zero discharge" of wastewater effluent.

8. Old permit issues included in this reapplication

- In the reapplication, (Volume 1, page 1, paragraph 5), LANL indicates that the previous applications and other documents will be used as supporting documents. NMED requests that LANL provide citations and a copy of all documents that will be used as part of this application.

In December 1998, Barbara Hoditscheck, NMED-SWQB, and Steven Rae, Group ESH-18 discussed this matter and agreed to include information from the issuance of the Laboratory's NPDES Permit No. NM0028355, dated August 1, 1994, to the present. The Laboratory provided this information to NMED-SWQB on January 20, 1999 (LANL Memorandum ESH-DO:99-10) under Supplement 2 of the NPDES Permit Re-Application.

- Volume I, page 5, 2nd paragraph of the reapplication states, "Currently, designated State Water Quality Standards do not exist for the intermittent drainage's located within the laboratory boundaries, only for the Rio Grande itself". NMED-SWQB disagrees with this statement. While there are no designated uses specified in subpart II of the current New Mexico Standards for Interstate and Intrastate Streams (20 NMAC 6.1), designated uses are specified in § 1105.A of the standards. Further, existing and attainable use will need to be considered in review of this permit application.

No information or response requested by NMED-SWQB.

9. Transfer of wells to Los Alamos County

- According to Scott Wilson (EPA), the transferred wells indicated in the lease, and proposed for removal from LANL's permit, will be removed by EPA when they receive an application from Los Alamos County. Describe how DOE/LANL will assure that the

county submits this application since the lease agreement itself does not set a timeline for submittal.

Since September 1998, the Laboratory has been engaged in several oral and written communications with the EPA, DOE, NMED-SWQB, and the Los Alamos County regarding: the DOE's lease agreement for transfer of the Los Alamos Water Production System to Los Alamos County; the deletion of associated NPDES outfalls from the Laboratory's NPDES Permit No. NM0028355; and, the submittal of an NPDES application to EPA by Los Alamos County for these outfalls. Following is a chronology of written documentation on-file:

- (1) September 14, 1998, letter (ESH-DO:98-268) from Dennis J. Erickson, ESH-DD, LANL, to William B. Hathaway, Director, EPA Region 6. The Laboratory notifies EPA of DOE's lease agreement with Los Alamos County to assume operational responsibility for the Los Alamos Water Production System, and requests that the thirteen (13) NPDES Outfalls associated with the drinking water system be deleted from the Laboratory's NPDES Permit No. NM0028355. NMED-SWQB was provided with a copy of this letter.
- (2) December 22, 1998 letter from Chris Ortega, Utility Manager, Los Alamos County, to William B. Hathaway, Director, EPA Region 6 (Enclosure 7). In the letter, the Los Alamos County: notifies EPA of the DOE's lease agreement to transfer responsibility of the Los Alamos water production system to the Incorporated County of Los Alamos; requests an evaluation by EPA for the need to permit the subject drinking water supply wells under NPDES; and, requests that the Los Alamos Water Supply System portions of the NPDES permit renewal request submitted May 4, 1998, by the DOE and LANL be considered as the application by Los Alamos County for permitting the facilities.
- (3) January 7, 1999, letter (ESH-DO:003) from Dennis J. Erickson, ESH-DD, LANL, to William B. Hathaway, Director, EPA Region 6. The Laboratory clarifies a conversation between Wilma Turner of EPA Region 6, and Mike Saladen, ESH-18, LANL, wherein Ms. Turner indicates to Mike Saladen, that the EPA would not delete the 13 NPDES outfalls associated with the Los Alamos Water Supply System from the Laboratory's NPDES Permit No. NM0028355 until the Los Alamos County submitted NPDES applications for the outfalls to EPA. The letter also clarifies the Laboratory's understanding that Scott Wilson, Permit Writer, EPA Region 6, advised Tim Glasco, Deputy Utility Manager, County of Los Alamos, to submit an application to EPA for permitting the water supply system facilities. A copy of this letter was previously provided to NMED-SWQB.
- (4) January 11, 1999, letter from Jack V. Ferguson, P.E., Chief, NPDES Permits Branch, EPA Region 6 to David Gurule, Area Manager, DOE Los Alamos (Enclosure 8). EPA indicates to DOE that until the leasee (Los Alamos County) has submitted an NPDES Permit Application for the thirteen (13) NPDES Outfalls associated with the Los Alamos Water Supply System, the

EPA recommends that the 13 outfalls not be deleted from the Laboratory's NPDES Permit No. NM0028355. A copy of this letter was provided to NMED-SWQB.

- (5) February 22, 1999, letter (LAAME:3JV-017) from Joseph C. Vozella, Assistant Area Manager, Office of Environment, DOE Los Alamos, to Joseph C. King, County Administrator, Incorporated County of Los Alamos. Mr. Vozella clarifies his understanding that the EPA Region 6 has determined that the County of Los Alamos must submit its own application for the 13 NPDES outfalls associated with the Los Alamos Water Supply System. He states further, that he encourages the County to take action to submit an application as soon as possible so that the 13 outfalls could be deleted from the Laboratory's NPDES Permit No. NM0028355, and that LANL will continue to file Discharge Monitoring Reports for these discharges until EPA accepts the County's permit application. A copy of the letter is provided as Enclosure 9.
- (6) March 2, 1999, letter (ESH-18/WQ&H:99-0065) from Steven Rae, Group Leader, Group ESH-18, to Chris Ortega, Utility Manager, Los Alamos County. In the letter, the Laboratory transmits to the Los Alamos County copies of the following documents for their use in submitting an application to EPA: NPDES Permit application instructions; an original *Form 1 General* to be completed by Los Alamos County, completed original *Form 2C* applications for the 13 existing NPDES outfalls, completed original *Form 2D* applications for 12 new sources or discharges, and, other miscellaneous application support documentation and information associated with these discharges. A copy of this documentation was transmitted to NMED-SWQB.

The cover-letter to Los Alamos County indicates that the application forms were completed with all outfall discharge-related information required by the NPDES application instructions except for specific applicant data which is required to be filled out by the Los Alamos County on *Form 1 General*, original signatures, and dates the forms are signed. In the letter, the Laboratory also offers to meet with Los Alamos County staff to respond to questions and further assist them in completing this effort, and requested that copies of all information submitted to the EPA be provided to Group ESH-18 so that the Laboratory can maintain a complete file on these NPDES outfalls. A copy of this cover-letter was transmitted to NMED-SWQB.

- Appendix C needs to be revised as per the letter of September 4, 1998, which reflects the water system transfer. Outfalls, 03A-040, 03A-045, and 06A-106 are pending outfalls that were not covered in volume 1 of the reapplication. Please provide the necessary information. Also provide the following exhibits indicated as part of the lease, but which were provided in the reapplication: A, B, and D through H. In addition, please identify SWMUs found above and below all wells and indicate these on the system map (exhibit C of the lease).

NPDES Outfalls 03A040, 03A045, and 06A106 were not included in the reapplication because the discharges to these outfalls were in the process of being eliminated. In a

letter dated November 25, 1998, (LAAME:6BK-015), from David A. Gurule, Area Manager, DOE Los Alamos, to William Hathaway, Director, EPA Region 6, the Laboratory requested deletion of NPDES Outfalls 03A040 and 06A106. In a responding letter dated January 11, 1999, from Jack V. Ferguson, P.E., Chief, NPDES Permits Branch, to David A. Gurule, Area Manager, DOE Los Alamos Area Office, the EPA notified the Laboratory of the deletion of the two NPDES outfalls 03A040 and 06A106 from the Laboratory's NPDES Permit No. NM0028355. A copy of this letter was provided to NMED-SWQB.

No effluent is currently discharging to NPDES Outfall 03A045 located at TA-48-1. Construction to modify the outfall piping is scheduled to be completed within 60 days. The Laboratory will then submit a request to EPA for the elimination of this outfall from the Laboratory's NPDES Permit.

The Laboratory is a not party to the Lease Agreement and is not authorized to release the exhibits which you have requested. Please contact the DOE Los Alamos Area Office or the Los Alamos County Attorney's Office for this information.

10. NOI Potable Water Issues

- The potable water Notice of Intent (NOI) in the application should be addressed as a state WQCC issue and not a federal NPDES issue. It is suggested that it be removed from the reapplication.

The Notices of Intent to Discharge (NOIs) were submitted as part of the application for informational purposes only.

11. NEPA

- The reapplication states that NEPA documents were written for outfalls which were removed from the NPDES application. Does DOE plan to submit a NEPA for the remaining outfalls? If not, please explain.

DOE's National Environmental Policy Act (NEPA) Regulations require that an Environmental Assessment be performed to determine impacts to the environment from the reduction of effluent and elimination of outfalls. The Laboratory will prepare an Environmental Assessment as necessary for any future NPDES permitted outfalls targeted for reduction of effluent not covered by previous assessments.

12. Outfalls

- NMED-SWQB requests LANL provide a schedule for any proposed "future" outfall elimination.

Currently, fourteen (14) NPDES Outfalls are pending elimination from the Laboratory's NPDES Permit. These outfalls include: 03A045 and thirteen (13) non-contact cooling water outfalls (Category 04A) associated with the Los Alamos Water Supply System.

No proposed or final schedule is available for the elimination of these NPDES permitted outfalls. Once a schedule is developed, it will be transmitted to the NMED-SWQB under separate cover.

- Has LANL addressed all outfalls associated with arsenic problems? (e.g., all 03A outfalls proposed in the application)? Please provide information clarifying this issue. Identify any outfalls that still have arsenic problems, and indicate when the problem will be resolved.

All cooling tower outfalls (NPDES Category 03A) which have had arsenic problems have been addressed. Corrective actions taken to address the arsenic problems include: removal of arsenic treated wood from the cooling towers structure and replacement with non-arsenic containing materials; cooling towers taken off-line; operational sampling; and, controlling the blow-down cycles of concentration or treatment through ion exchange systems. The long-term corrective actions for the TA-53 cooling towers (NPDES Outfalls 03A048 and 03A049) is to replace the two wooden cooling towers with new unit(s) constructed of other materials. This information has been provided in Appendix Q of the NPDES Permit Re-Application and Attachment 7 of Supplement 2.

- NMED-SWQB requests that outfalls associated with cooling towers be monitored for chromium 6 (Cr6). Data from samples collected from Sandia wetlands have found to contain high levels of Chromium (4,000 ppm). This may imply that the high volume of cooling tower water being discharged from outfall 001 may have contained Cr6.

Chromium 6 is not a specified monitoring parameter under the Laboratory's current NPDES Permit or in the Form 2C of the NPDES Application. Chromium 6 has not been used in water treatment chemicals for many years, therefore is not expected to be in the Laboratory's cooling tower effluent. Group ESH-18 can assist in coordinating an effluent screening effort for Chromium 6 with the NMED-DOE Oversight Bureau, if such is desired. A formal follow-up sampling to support the Laboratory's NPDES Permit Re-Application can then be conducted if screening results indicate a presence of Chromium 6.

- Identify all outfalls (permitted and closed) which were associated with the 10 old wastewater treatment plants. What volumes of storm water have/do they receive?

All outfalls (permitted and closed) associated with the 10 old wastewater treatment plants are noted in Appendix C of the Laboratory's NPDES Permit Re-Application. There are no discharges from the old wastewater treatment plants. NPDES Outfall 13S is the only NPDES outfall permitted in the sanitary outfall category. The Laboratory's re-application document provides information on storm water discharges to the TA-46 SWSC Plant.

13. WAC

- How will LANL ensure that the WAC is properly implemented? Describe the procedure/process used to assure compliance with the WAC. When will EPA or NMED-SWQB be notified if the WAC is violated?
- NMED has received some, but not all, WACs and the Waste Management Policy. Comments are not included in this letter, but will be addressed under separate cover.
- NMED would appreciate further information regarding the composition of the SWSC task force (e.g., what groups are represented). We believe inclusion of this information would be beneficial.

The Laboratory has developed Waste Acceptance Criteria (WAC) for the TA-50 RLWTF, TA-46 SWSC Plant, and the TA-16 HEWTF. Any Laboratory facility planning a new discharge into one of the aforementioned treatment facilities must provide a Waste Profile Form (WPF) for approval prior to disposal into the collection system. Waste streams on the WPF are characterized by both knowledge of process, analytical data, and must meet NPDES Permit requirements. All waste streams that do not meet the site-specific WAC criteria cannot discharge into the system. A facility wishing to discharge may apply for a variance to the policy. The variance must be approved by the Facility Management that owns the wastewater treatment process, the wastewater treatment plant operator and ESH-18 Group representative. A Notice of Changed Condition may be required to be submitted to EPA and NMED to meet NPDES Permit requirements. Examples of such notifications were previously provided to NMED-SWQB on January 20, 1999, under Supplement 2 of the Laboratory's NPDES Permit Re-Application, and in the original NPDES Permit Re-Application dated May 4, 1998. All existing waste streams are being reviewed for compliance with the WACs.

A description of the Waste Acceptance, Characterization, and Certification Program was submitted to NMED-SWQB on January 20, 1999, under Supplement 2 of the Laboratory's NPDES Permit Re-Application. Additionally, a copy of the Waste Profile Form (WPF) was provided to EPA and NMED in the original Re-Application and again on January 20, 1999. The WPF contains the WAC for the TA-50 RLWTF and TA-46 SWSC Plant. A copy of the TA-16 HEWTF's WAC is enclosed (Enclosure 6).

The TA-46 SWSC Task Force includes representatives from Johnson Controls Northern New Mexico (JCNNM) Wastewater Treatment Supervisor, Facilities Division, Utilities and Infrastructure Group (F-4), JCNNM Environmental Laboratory (JCNNM-TENV), Department of Energy, Los Alamos Area Office (DOE-LAAO), Hazardous Waste Group (ESH-19) and Group ESH-18.

14. Miscellaneous

- No form 2C was included in the reapplication as indicated per Volume 1 page 12 of the reapplication.

The Laboratory's NPDES Permit Re-Application, Volumes I and II, contain completed Form 2Cs for 34 NPDES permitted outfalls and Form 2Ds for 13 new source discharges, plus other relevant information including process flow diagrams, data summaries, location maps, etc. A listing of the 34 permitted outfalls and 13 new source discharges is provided as Appendix C in the Laboratory NPDES Permit Re-Application document. The third binder noted as "Appendices" also contains miscellaneous support documentation. Please advise if you have any missing Form 2Cs in your re-application document.

- Please provide a copy or explanation of the NPDES sampling protocol.

An explanation of the NPDES Permit Re-Application Sampling Plan was provided in Section 5.2.4 of the *Laboratory's NPDES Permit Re-Application Project Implementation Plan*. Also provided as Appendix O of the *Laboratory's NPDES Permit Re-Application Implementation Plan* was a completed copy of the "Sampling Plan for Los Alamos National Laboratory's NPDES Permit re-application," dated October, 1997. A "Draft" copy of this Implementation Plan was hand-carried by Mike Saladen and Tina Marie Sandoval, of ESH-18, to a January 30, 1998, meeting with Scott Wilson of EPA Region 6 in Dallas Texas. Permit Re-application sampling issues were discussed with EPA in detail. A copy of the meeting minutes from the EPA meeting noting conversations with EPA and clarification of issues were transmitted to NMED-SWQB, on March 13, 1998. In addition, a final copy of the Implementation Plan including the Laboratory's NPDES sampling protocol again noting all conversations and agreements with EPA including the issues discussed at the January 30, 1998 meeting, was hand-delivered to NMED-SWQB on March 13, 1998. A final copy of the Implementation Plan was also transmitted via U.S. mail to EPA, Steve Yanicak, NMED DOE/OB, and others on March 18, 1998.

A detailed explanation of the NPDES sampling protocol was included on page 19, Section 7.2 of the *Laboratory's NPDES Permit Re-Application*. A complete copy of the "revised April 1998" sampling plan was provided in the reapplication as Appendix R. A copy of the reapplication was hand-delivered to the NMED-SWQB, on May 4, 1998.

- Appendix M (Sludge Handling Procedure) does not address current sludge disposal practices (e.g., language in the application states that LANL will dispose of sludge pursuant to TOSCA regulations). NMED also requests the following information regarding this disposal be provided during the life of the permit: volumes disposed, PCB analysis associated with those volumes, and location of disposal site.

The sludge handling procedures were identified in the "Notification of Planned Change In Sewage Disposal Practice at Los Alamos National Laboratory, NPDES Permit No. NM0028355" submitted to EPA and NMED on July 31, 1997. Due to the routine presence of low-level PCBs in the TA-46 SWSC Plant, sanitary treatment solids (sludge and grit/screenings), the Laboratory made a formal change in sludge management practice. Land application of the sludge was suspended for an indefinite period of time in May, 1996. All sanitary treatment solids generated at the TA-46

SWSC Plant have been handled, stored, sampled, and disposed of as a PCB contaminated waste. EPA approved the sludge disposal practice change in a letter dated November 13, 1997 from Nelson Smith, EPA, to Steven Rae, ESH-18. All sludge is characterized and documented on a Waste Profile Form according to LIR404-00-1.2, Waste Acceptance, Characterization, and Certification Program, and LIG404-00-03.0, Waste Profile Form Guidance. This information was previously provided to NMED-SWQB in Appendix M of the original NPDES Permit Re-Application and in Supplement 2.

Information regarding sludge disposal, sludge volumes, PCB levels associated with the sludge volumes and disposal location is included in the Laboratory's annual report required by the Laboratory's Ground Water Discharge Plan. Copies of the 1996, 1997 and 1998 annual report have previously been transmitted to the NMED-SWQB. Copies of the annual reports are included as Enclosures 10, 11, and 12.

The Laboratory will continue to evaluate the long-term waste issues and options regarding the management of the Laboratory's sludge. Appendix M, the "*Laboratory's Sludge Handling Procedures*" will be modified accordingly to include changes in disposal practices. A copy of the modified sludge handling procedures will be transmitted to EPA and NMED-SWQB under separate cover. The Laboratory will provide written notification to EPA and NMED and request authorization under the NPDES Permit, prior to change in disposal practices.

- Please provide information concerning testing results and disposal volumes of grit and screenings. Also, provide language in the reapplication indicating LANL's commitment to provide this information in the future.

Information regarding sampling, testing, and reporting of sludge has previously been provided to NMED-SWQB, in a Notice of Changed Condition, ESH-18/WQ&H:97-0216, dated July 31, 1997. The information requested is also documented in Appendix M of the Laboratory's NPDES Permit Re-Application document. Please refer to the above documents for details. Information concerning testing results of sludge, grit and screenings for 1997 and 1998 is included in Enclosure 13 and will be provided to EPA and NMED-SWQB in the future.

- As indicated on pages 5-7 of the reapplication, "The regional aquifer of the Los Alamos area occurs at the depth of 1200 ft along the western edge of the plateau, and 600 ft along the eastern edge". Please provide information clarifying if the distance provided to the regional aquifer is measured from a mesa top or canyon bottom. Also, since LANL has defined the depth of the regional aquifer it would be appropriate to address the depth to all alluvial, intermediate perched or regional ground water occurrences and this related to NPDES outfall discharges.

The depth of 1200 ft along the western edge of the plateau to the regional aquifer was measured from the mesa top whereas the depth of 600 ft along the eastern edge to the regional aquifer was measured from the canyon bottom. This information is discussed in more detail on page 2-21 of the Laboratory's *Hydrogeologic Workplan*, dated May 22, 1998.

The Laboratory's *Hydrogeologic Workplan* describes activities proposed to be performed by the Laboratory to characterize the hydrogeologic setting beneath the Laboratory, and to enhance the Laboratory's groundwater monitoring program.

The centerpiece of the Workplan is the installation of additional wells that will provide for a better understanding of the hydrogeologic framework at the Laboratory, including recharge areas, hydraulic interconnections, flow paths, and flow rates, synthesized by modeling simulations. A copy of the Laboratory's Hydrogeologic Workplan has been provided to the NMED-SWQB on May 22, 1998 (Enclosure 14). The depths to all alluvial, intermediate perched, and regional ground water occurrences as related to NPDES outfall discharges are not fully known. Such an understanding of the subsurface hydrogeology is the subject of the Hydrogeologic Workplan and new Monitoring Well Project.

- Please describe the QA/QC protocols that LANL uses at its internal laboratory (the lab which provides the information for the Environmental Surveillance Report). Also, provide information that all other laboratories that are/were used employ adequate QA/QC procedures.

Analytical laboratories used by the Laboratory during the Laboratory's NPDES Permit Re-Application Project were required to follow EPA approved analytical methods and protocols. The QA/QC program required the analysis of a minimum of 10% duplicates, spikes and blanks during the analyses. Additionally, blind spike samples were submitted to the analytical laboratory by Group ESH-18. Data was validated by the Laboratory's Analytical Chemistry Group (NMT-1). A summary of the NPDES Permit Re-Application's Quality Assurance Program is documented in the Laboratory's NPDES Permit Re-Application Project Implementation Plan.

Specific QA/QC protocols used by the Laboratory's internal analytical testing laboratory in reporting data for the Laboratory's Annual Environmental Surveillance Report may be inspected by the NMED-SWQB at TA-59, Building 96. We will provide a special session for the NMED-SWQB on the QA/QC protocols completed under the Laboratory's Environmental Surveillance Program if such would be helpful. NMED can then determine the specific information which is desired.