



Associate Director for **ESH**  
Environment, Safety, and Health  
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Environmental Management

Los Alamos Field Office, MS A316

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Los Alamos, New Mexico 87544

(505) 667-4255/FAX (505) 606-2132

Date: MAY 06 2015

Refer To: ADESH-15-069

LAUR: 15-22213; 15-22211

Locates Action No.: N/A

Paulette Johnsey, Chief  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Water Enforcement Branch (6EN-W)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Everett Spencer  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Water Enforcement Branch (6EN-W)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

**Subject: NPDES Permit No. NM0030759 - Alternative Compliance Request for 52 Site Monitoring Area/Site Combinations Exceeding Target Action Levels from Nonpoint Sources and Alternative Compliance Request for 19 Site Monitoring Area/Site Combinations Exceeding Target Action Levels for Gross-Alpha Radioactivity**

Dear Ms. Johnsey and Mr. Spencer:

Enclosed please find one hard copy with electronic files of the U.S. Department of Energy's and Los Alamos National Security, LLC's (the Permittees') written requests for alternative compliance for 71 Site Monitoring Area (SMA)/Site combinations at Los Alamos National Laboratory (the Laboratory). These requests are being made in accordance with National Pollutant Discharge Elimination System Permit No. NM0030759 (hereafter, the Individual Permit) for the Laboratory.

If the Permittees believe they have installed control measures to minimize pollutants in storm water discharges from Sites but are unable to certify completion of corrective action under Part I.E.2(a) through (d) of the Individual Permit, Part I.E.3 allows them to request the Sites be placed into alternative compliance. The enclosed requests address 52 SMA/Site combinations where target action level (TAL) exceedances result from non-Site-related nonpoint sources and 19 SMA/Site combinations where TALs for gross-alpha radioactivity are exceeded because of natural background.

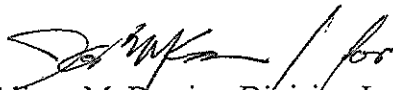
As required by Part I.E.3, the Permittees will issue a public notice of issuance of the alternative compliance request by publishing a notice in the *Los Alamos Monitor* and the *Santa Fe New Mexican* newspapers, by mailing a copy of the notice to those individuals on the New Mexico Environment Department- (NMED-) maintained Laboratory Facility Mailing List and to NMED, and by posting the notice on the Individual Permit section of the Laboratory's public website for a public review and comment period of 45 days. The Permittees will prepare a written response to all relevant and

significant comments, which will also be posted on the Individual Permit section of the Laboratory's public website.

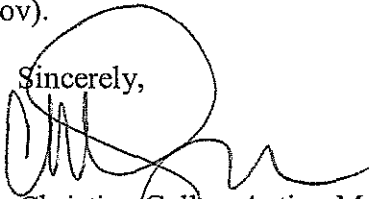
After the 45-day comment period, the Permittees will submit the alternative compliance request along with the complete record of public comment and the Permittees' response to comments to the U.S. Environmental Protection Agency, Region 6, for a final determination on the requests.

If you have any questions, please contact Terrill Lemke at (505) 665-2397 (tlemke@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@em.doe.gov).

Sincerely,

  
Alison M. Dorries, Division Leader  
Environmental Protection Division  
Los Alamos National Laboratory

Sincerely,

  
Christine Gelles, Acting Manager  
Environmental Management  
Los Alamos Field Office

AD/CG/DM/SV/TL:sm

Enclosures: One hard copy each with electronic files – Alternative Compliance Request for 52 Site Monitoring Area/Site Combinations Exceeding Target Action Levels from Nonpoint Sources (EP2015-0062) and Alternative Compliance Request for 19 Site Monitoring Area/Site Combinations Exceeding Target Action Levels for Gross-Alpha Radioactivity (EP2015-0061)

Cy: (w/enc.)  
David Rhodes; DOE-EM-LA, MS A316  
Steve Veenis, ADEP ER Program, MS M992  
Public Reading Room (EPRR)  
ADESH Records

Cy: (Letter and CD and/or DVD)  
Laurie King, EPA Region 6, Dallas, TX  
Steve Yanicak, NMED-DOE-OB, MS M894  
PRS Database

Cy: (w/o enc./date-stamped letter emailed)  
lasomailbox@nnsa.doe.gov  
Annette Russell, DOE-EM-LA  
Kimberly Davis Lebak, DOE-NA-LA  
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