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Environmental Programs LANL Water Stewardship Project/Waste & Environmental Services Standard Operating Procedure

for **EX-ID / PR-ID PROJECT REVIEWS FOR THE
FFCA PROJECT AND INDIVIDUAL PERMIT**

APPROVAL SIGNATURES:

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1.0 PURPOSE AND SCOPE

The purpose of this procedure is to ensure personnel working within a Federal Facility Compliance Agreement (FFCA) Project site or Individual Permit (IP) site are aware of the environmental requirements and regulatory compliance associated with the performing work activities at nearby sites, and how other project sites might impact an FFCA Project or IP site. This procedure also describes the responsibilities and process for determining whether FFCA Project or IP sites are potentially impacted by planned activities described in Excavation/Soil Disturbance Permits (EX/ID) requests, permits and requirements identification (PR-ID) postings, siting notifications, Geographical Information System (GIS) screening tool maps, and other project information.

1.1 Background

The process described in this document supports Standard Operating Procedure (SOP) 4006, *Review of Projects for Impacts to Potential Release Sites (PRS)*, Laboratory Procedure P941, *Site Planning*, Laboratory Institutional Policy and Implementation Procedure (IPP) 400.0, *Environmental Protection*, Laboratory Implementation Procedure (IMP) 401.2, *Procedure to Identify, Communicate, and Implement Environmental Requirements*, and Institutional Support Document (ISD) 101-17, *Excavation/Soil Disturbance Permit Process, and Storm Water Pollution Prevention Plans for SWMUs and AOCs and Storm Water Monitoring Plan (LA-UR-07-1789), Environmental Programs Corrective Actions Program Construction Activities, TA-21 Closure Project Construction, and others.*

Environmental Programs- Los Alamos National Laboratory Water Stewardship Program (EP-LWSP) personnel and/or subcontractors will use this procedure when:

- reviewing a planned project or activity to determine if a FFCA/individual permit (IP) site could be impacted. Planned projects and activities requiring review are described in EX-IDs, PR-IDs, siting requests, GIS screening tool maps, or direct requests from Laboratory personnel;
- documenting EP SME review comments and requirements, site visits, photos, analytical data (where available), other issues which include follow-up and closeout of any open actions (i.e., resolution of open PR-ID requirements) and correspondence with the EX-ID and/or PR-ID requestor and/or project manager.

An EP SME conducting a FFCA Project/ IP impact review is any person assigned by the FFCA project leader to review a request for a proposed activity to be implemented within the boundary of the Laboratory located on property previously owned and operated by the Laboratory.

EP SMEs review every PR-ID, EX-ID, and siting notification for potential impacts to FFCA impacted sites regardless of the size of the planned project or activity. An overview of the project review process is provided in the flow chart to this procedure.

Submit review comments on a PR-ID within ten (10) working days, and within 2 to 15 days to an EX-ID request depending on the priority of the project. If the review cannot be completed by the due date, or if further action is needed by the SME Reviewer, enter a comment indicating the review status before the posted due date and contact the requestor.

[NOTE: PR-IDs are open for comment after the due date until the PR-ID is closed, revised, cancelled, or completed.]

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1.2 Precautions

The FFCA project leader is ultimately responsible for the quality and timeliness of FFCA project reviews and comments; however, the project leader may assign responsibility to the SMEs conducting the project reviews.

The SME implementing this procedure will determine which requirements are applicable when the planned project activities will occur within the boundary of a Sample Monitoring Area (SMA), or in close proximity to a permitted PRS, or may result in potential run-on to a PRS, and will include the requirements in review comments. Work should be coordinated with SMEs designated by the PRS Coordination Project Leader.

2.0 PREREQUISITE TRAINING

Process-specific training is required for submittal of FFCA Project Review comments for EX-IDs, PR-IDs, and siting requests in accordance with the implementing procedures for each process.

3.0 EQUIPMENT AND TOOLS

E-mail notifications are distributed to participants in the project review process. E-mail is used during the initial screening and review process for screening reviews and documenting site visits for the EX-ID, PR-ID, and siting request systems. FFCA Project data is located on the ER-WSP GIS tool at ENV-RCRA as project-specific GPS information, which is converted into an Adobe PDF format and attached to emails for submitting responses to project reviews. Detailed descriptions of PRSs, including sampling data summaries for a majority of the PRSs, can be found in the PRS database: <http://erinternal.lanl.gov/PRS/PRSMain.asp>. The GIS screening tool maps can be found at http://env-arcims-prod/website/IWM_ProximityAnalysis_Axl/viewer.htm can be used to identify planned work locations and corresponding locations of PRSs, infrastructure, etc.

4.0 STEP-BY-STEP PROCESS DESCRIPTION

4.1 EX-ID Reviews

- | | | |
|--------------|----|--|
| SME Reviewer | 1. | Review the EX-ID and any associated documents or reports which may be attached or linked to the EX-ID in the EX-ID system. |
| | 2. | Review the EX-ID title and project description/scope of work to ascertain whether the excavation, fill, or other soil disturbance being performed could potentially impact a drainage area, Sample Monitoring Area (SMA) monitoring sampler, gage station, or permitted PRS within, or partially within the boundary of the FFCA project or Individual Permit. |

4.2 EX-ID Emergency Review

- | | | |
|--------------|---|---|
| SME Reviewer | 1 | Review the EX-ID and any associated documents or reports which may be attached or linked to the EX-ID in the EX-ID system. |
| | 2 | Review the EX-ID title and project description/scope of work to ascertain whether the excavation, fill, or other soil disturbance being performed is within an FFCA Project or IP drainage area and what SMA samplers are potentially impacted. Identify the erosion score. |

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3 Submit Emergency Review comments to customer – “proceed under the direction of ENV-RCRA Mark Haagenstad, in coordination with Jeff Waltersheid.”

4 Determine if the excavation, fill, or other soil disturbance area is within or in close proximity to a FFCA or Individual Permit drainage area or could otherwise impact an SMA by referring to GIS maps.

[NOTE: If the excavation/disturbance area is within a PRS boundary or footprint, any soil disturbance or disturbance of an existing structure that is a PRS may have regulatory compliance issues.]

5 Review any associated PR-ID(s) and EX-ID(s) for potential differing information and/or previous relevant review comments.

4.3 PR-ID Reviews

- SME Reviewer
1. Review the PR-ID and any associated documents or reports which may be attached or linked to the PR-ID in the PR-ID system.

 2. Read the posted comments of other SME reviewers, when available to determine scope of work details, other environmental concerns, and regulatory requirements.

 3. Examine the following sections in the PR-ID for additional information on the scope, location and schedule of the planned project activities:
 - Section 1.5, Funding Type and total Estimated Cost (indicates overall magnitude and scope);
 - Section 1.6, Project Location (i.e., Technical Area [TA], building[s]) and the location map provided (using the GIS tool);
 - Outside Work, See comments in Section 7.0 of the PR-ID;
 - Section 1.8, Project Description, including schedule; Section 3.1, Construction (may indicate potential impact to a PRS);
 - Section 3.4, New, modified, or relocated program, project, process (may indicate changes to existing building footprint and/or soil disturbance potentially impacting a PRS);
 - Section 7.0, Outside Work (may indicate whether grubbing or soil disturbance will occur; whether PRSs have been identified and/or will be disturbed; whether asphalt or concrete or soil is to be relocated off the site; whether the site was previously disturbed; size of soil area to be disturbed; whether work will occur near an area previously disturbed; size of soil area to be disturbed; whether work will occur near any drainage area, arroyo, or storm drain; whether the site will be revegetated; etc.).

 4. Clarify inconsistent statements or resolve them through review of other documents and data, other SME comments, and/or discussion with the requestor. See Attachment 3, Standard Project Review Text Options.

4.4 PRS Review Assignment and Initial Project Screening

- | | | |
|----------------|----|--|
| Project Leader | 1. | Project review requests are received by the PRS coordination project leader and/or a designee. Attachment 2, FFCA Project Review Process Overview defines the primary steps. |
| | 2. | Coordinate customer requests and assign project review to the appropriate SME and other staff members to support the project review process through various Laboratory work systems and associated processes. |
| SME Reviewer | 3. | Screen the project location described in the request to determine whether a PRS will or could be disturbed by planned project activities: <ul style="list-style-type: none">Review the map linked to the EX-ID/PR-ID/siting request/JHA or provided by the requestor. [Request a faxed copy of the map from the requester if an electronic version is not available.Compare planned project location to PRS and FFCA/IP locations in the FFCA GIS mapping tool. |
| | 4. | <ul style="list-style-type: none">Review the FFCA GIS maps and verify that the proposed area maps correctly depict the PRSs and SMA drainage impacts in the area and determine if a PRS could or will be impacted by the planned work activities.Obtain site map from the KSL Infrastructure and Utilities Map Service if additional site information including the locations of buildings and utilities is necessary from (http://frodo.jci.lanl.gov/website/Building_Locator/viewer.htm). <p>See Attachment 2, PRS, CGP& FFCA/IP Project Review graphic representation of the project review process.</p> |
| | 5. | If screening results indicate a PRS or FFCA/IP site SMA sampler will or could be impacted, specific requirements will apply when working in the PRS and FFCA/IP boundaries. |
| | 6. | Degree of FFCA/PRS Impact: MINOR . If the planned work activities will involve routine facility maintenance and utility work within a FFCA permitted PRS (i.e., pipe or conduit repair, sign installation/replacement, irrigation system maintenance, asphalt repair) a site visit and consultation with the customer are likely not necessary unless requested by the customer.

Provide applicable requirements for working in a SMA FFCA or IP PRS and any available data for the PRS in review comments for the customer to read and follow. Impacts to other PRSs are covered through the SOP 4006 process and are not addressed in this SOP. |
| | 7. | Degree of FFCA/PRS Impact: MAJOR . If the planned work activities will involve the permanent removal of contaminated soil or other materials from a FFCA permitted PRS, discharges of storm water or wastewater to a FFCA permitted PRS, construction of a building or roadway within a FFCA permitted PRS, or modification of the site that could prohibit/alter future Consent Order work.

SME review comments must include a requirement for consultation and a site visit by an ENV-RCRA SME along with applicable requirements for working in a PRS and any available data for the PRS. Impacts to other PRSs are covered through the SOP 4006 |

Step 7
(continued)

process – reference further guidance in this SOP.

Based on the proposed work, additional SME review activities may apply which include but are not limited to requirement determination, consultation, and coordination with ENV-RCRA Storm Water Field Operations field support, ENV-RCRA Construction General Permit staff, EP aggregate area project leaders and the project manager/requestor may be required based on proposed work.

If proposed work could impact a PRS in such a way that future Consent Order work could be altered or compromised, soil is planned to be removed from the site, or drainage to or from the site may be altered, further SME consultation and site visits will be required.

8. If screening results clearly indicate that a FFCA permitted PRS is not located within close proximity (100 feet) of the planned work location, the SME conducting the screening shall submit formal comments for the specific EX-ID/PR-ID/project planner request indicating that there will be no PRS impacts from planned project activities as long as the scope of work and project location do not change.

9. Provide requirements for working within a FFCA permitted PRS in accordance with the appropriate system procedures for EX-IDs, PR-IDs, siting request or directly to the project planner who requested the information within the allotted time frame. Submit Emergency Review comments to customer with the note "Proceed under the direction of ENV-RCRA Mark Haggstad, in coordination with Jeff Waltersheid or designated alternate.

10. Depending on the situation, perform the following steps:

- work with the customer/requestor who proposed the activity to determine avoidance techniques;
- recommend coordination activities with environmental compliance organizations;
- Provide ongoing guidance as requested by the customer or by the EP aggregate area project leader.

4.5 Performing a Site Visit

SME Reviewer 1. If a PRS or SME sampler might be impacted, Storm Water Field Operations field support coordination will conduct a site visit or consultation based on major or minor impacts.

Storm Water Field Operations SME 2. Perform visual inspection of the site with project requestor. Using GIS maps, EP PRS maps, planned project location maps and actual scope of planned activities, confirm whether or not the drainage area and SMA will be impacted

3. If PRS will be impacted, discuss impact mitigation strategies and potential work requirements with requestor.

4. Document site visit attendees, PRS(s) of interest, site conditions, and how/if project activities will impact PRS(s), agreements, etc. Submit a summary of the field meeting and activities to the project review SMEs for incorporation in official records, and also submit a copy to meeting participants. Reference Attachment 5 "Field Visit of PR-ID or EX-ID Field Work for FFCA/IP Compliance".

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4.6 Follow-up, Verification, and Closeout

- SME Reviewer 1. Request modification or delay of the requestor's planned project activities if agreement cannot be reached regarding the requirements for supporting compliance of the FFCA/Individual Permit.

[NOTE: The review of the EX-ID is closed when the SME reviewer submits comments into the EX-ID system and the review is shown on the system as complete. The review of the PR-ID is closed when the PR-ID tool indicates no additional actions are required by the customer or SME point-of-contact (POC).]

4.7 Records

- Project Leader 1. Maintain monthly progress records of the project and summary reports of activities performed by SME's. Report on budget and expenditures.

- SME Reviewer 2. Maintain SME comments on EX-IDs, PR-IDs, and siting requested electronically.

3. Provide a report monthly to the FFCA project leader that tracks responses performed. Maintain responses electronically by email and submit to the project point of contact, FFCA project leader, and points of contacts and copy to the ENV-RCRA construction permit team point of contact for coordination purposes. Records must be retained for 3 years for NPDES compliance agreements.

5.0 DEFINITIONS

Area of concern (AOC) - Any suspected release of hazardous waste or hazardous waste constituent, which is not directly associated with a SWMU (U.S. Environmental Protection Agency, EPA, 1986).

BMP - Best Management Practices – Permit condition used in place of or in conjunction with effluent limitations to prevent or control the discharge of pollutants. May include schedule of activities, prohibition of practices, maintenance procedure, or other management practice. BMPs may include, but are not limited to, treatment requirements, operating procedures, or practices to control plant site runoff, spillage, leaks, sludge or waste disposal, or drainage from raw material storage.

FFCA Project – Federal Facility Compliance Agreement, which establishes a compliance program under the Clean Water Act for the regulation of storm water permit issued by the permitting authority pursuant to the National Pollutant Discharge Elimination System storm water permitting program.

MSGP – Multi-Sector General Permit, the discharge of storm water associated with industrial activities is regulated by the National Pollutant Discharge Elimination System (NPDES)

NPDES - National Pollutant Discharge Elimination System - The national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 318, 402, and 405 of the Clean Water Act.

6.0 ATTACHMENTS

Attachment 1: FFCA Project Review Process Overview

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Attachment 2: PRS, CGP, & FFCA/IP Project Review Graphic

Attachment 3: Standard Project Review Text Options

Attachment 4: GIS Map Example

Attachment 5: Field Visit of PR-ID or EX-ID Field Work for FFCA/IP Compliance

REVISION HISTORY

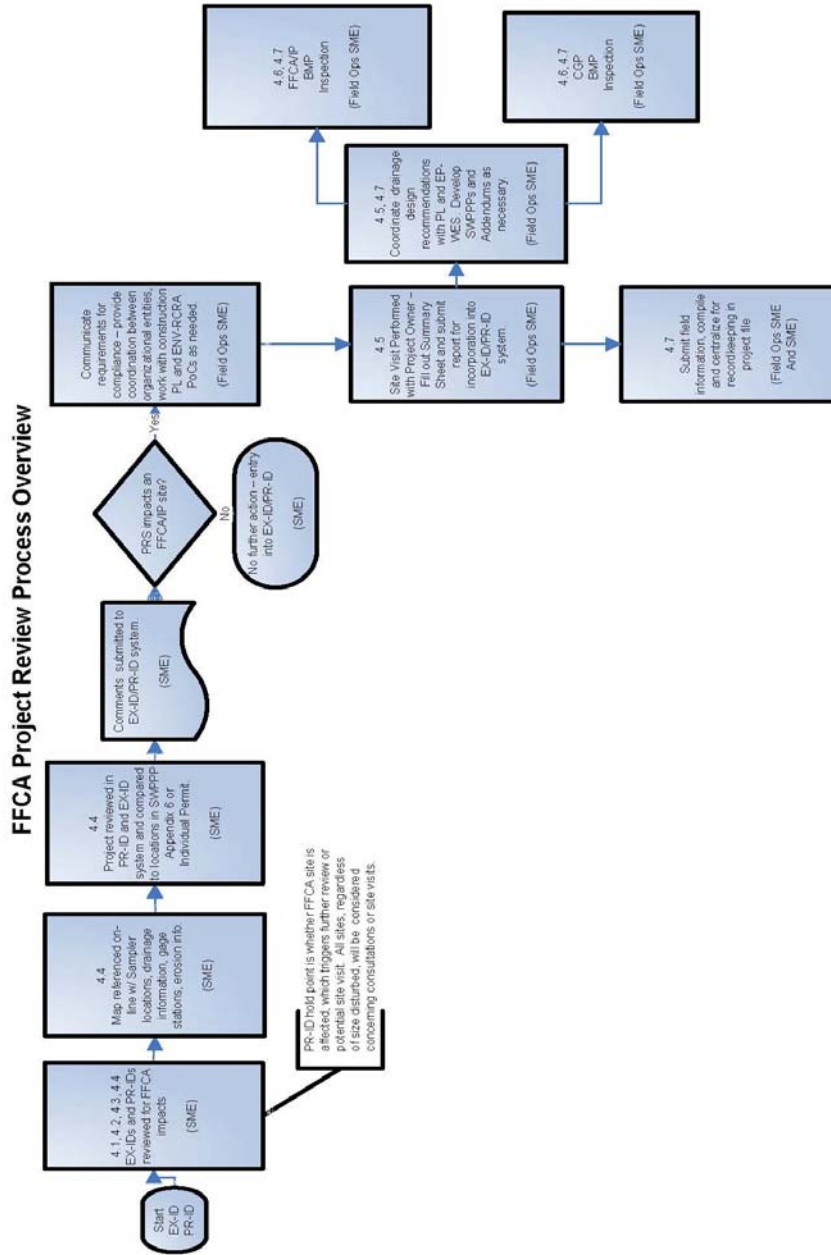
<i>Revision No.</i>	<i>Effective Date</i>	<i>Prepared By</i>	<i>Description of Changes</i>	<i>Affected Pages</i>
0	10/29/08	Melanee Shurter	New	All

[Using a CRYPTOCard, click here to record "self-study" training to this procedure.](#)

If you do not have a crypto card with A-level Access, contact creichelt@lanl.gov for instructions on credit.

ATTACHMENT 1

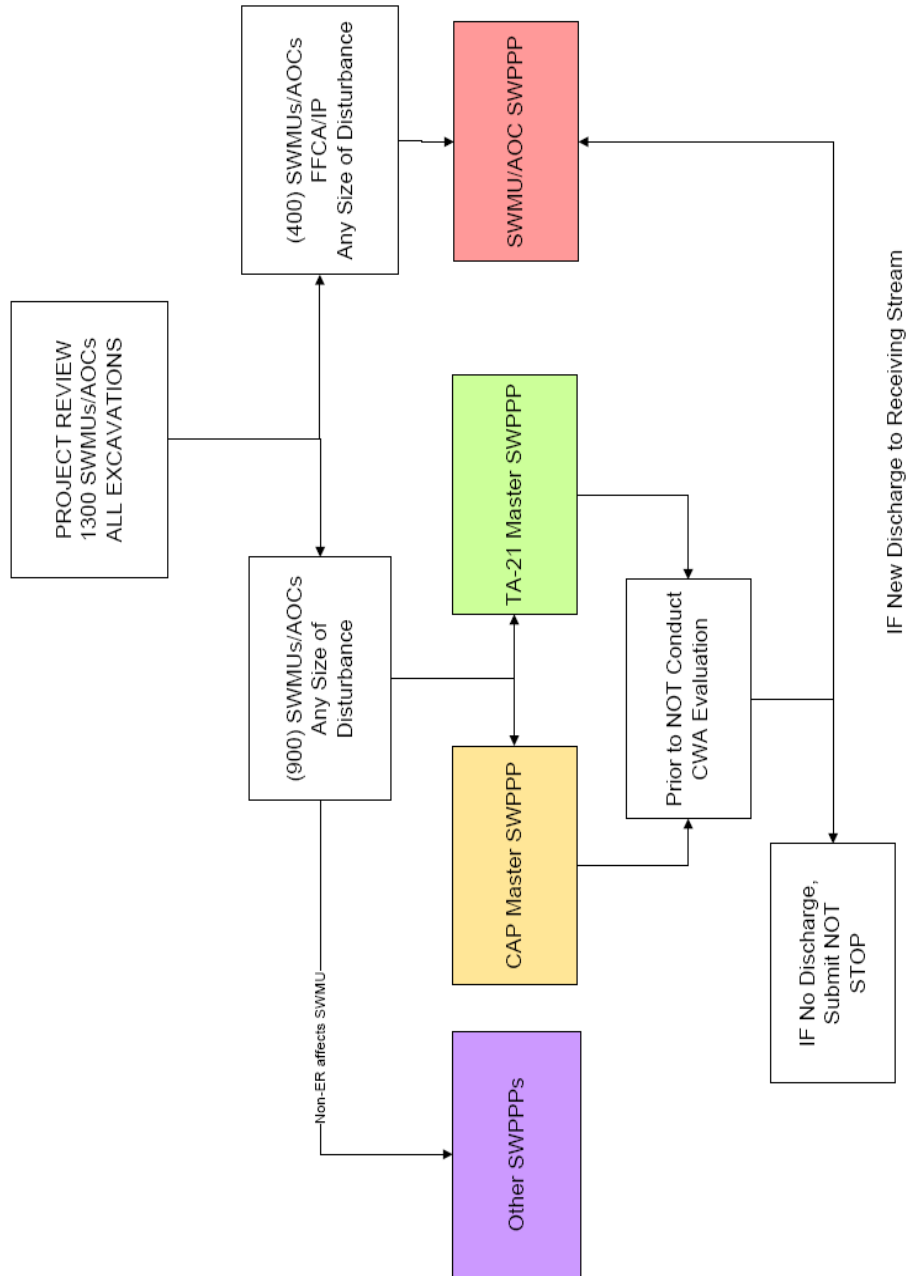
FFCA Project Review Process Overview



ATTACHMENT 2

PRS, CGP, & FFCA/IP PROJECT REVIEWS

PRS, CGP, & FFCA/IP Project Reviews

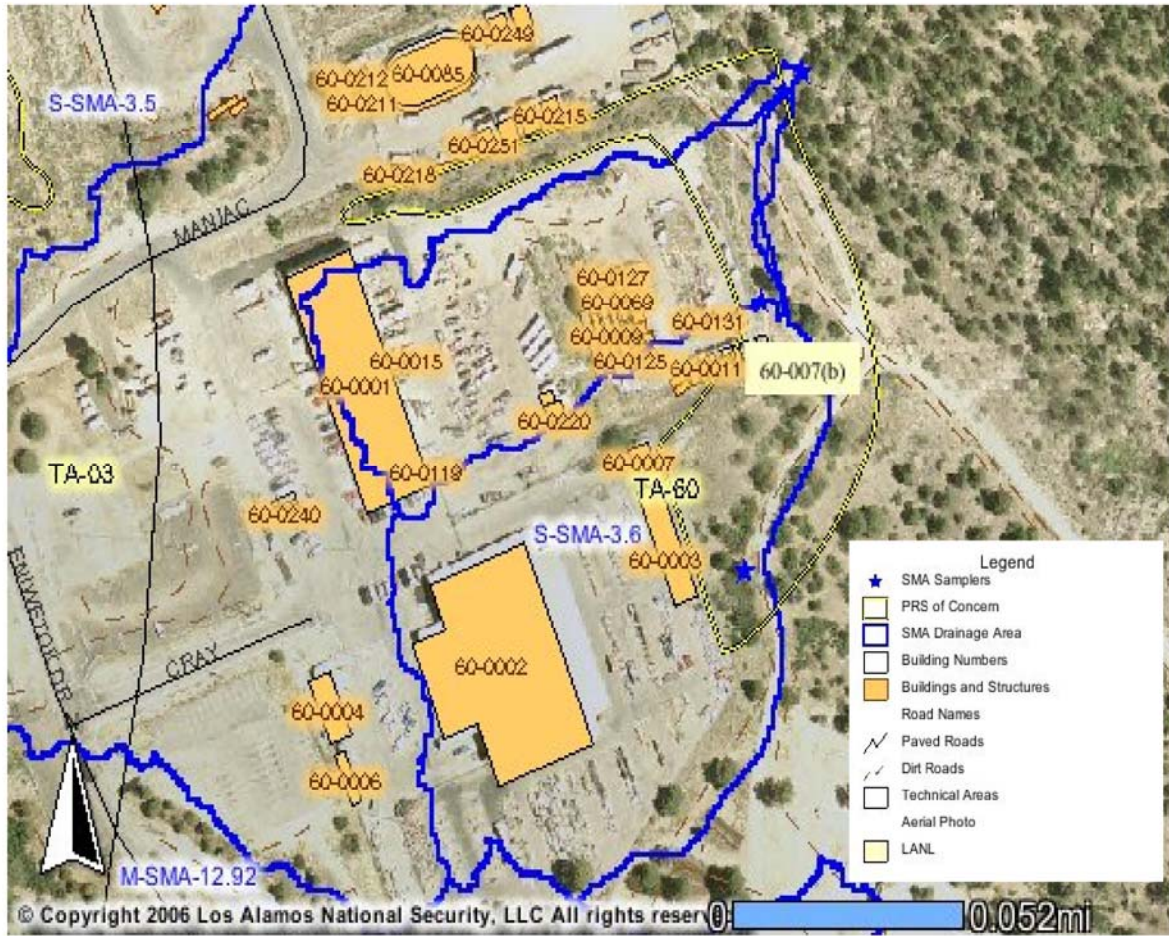


ATTACHMENT 3
STANDARD PROJECT REVIEW TEXT OPTIONS

Option	Project Impact	Guidance
1	Project does not impact an FFCA drainage area, sampler, or FFCA PRS	<p>Based on further review to identify possible impacts and concerns for ENV-RCRA water quality per Multi Sector General Permit (MSGP) and Federal Facility Compliance Agreement (FFCA) requirements, your project does not impact an FFCA drainage area, sampler, or FFCA PRS. Please reference the attached map. The project may proceed without further consultation from the FFCA Project staff based on the information in this review.</p> <p>For information regarding FFCA SWPPP work requirements, or if you have questions or concerns, please contact Melanee Shurter (Office: 667-7369, Cell: 505-231-0520, Email: mshurter@lan.gov) or Steve Veenis (Office: 667-0013, Cell: 699-1764, Email: veenis@lanl.gov).</p>
2.	Project is located within a FFCA or Permit Drainage Area	<p>Based on further review to identify possible impacts and concerns for ENV-RCRA water quality per Multi Sector General Permit (MSGP) and Federal Facility Compliance Agreement (FFCA) requirements, your project is within a FFCA or Permit Drainage Area. [identify the drainage site, samplers affected].</p> <p>Please ensure that your project uses appropriate Best Management Practices (BMPs) to protect watercourses and drainage from the project site to maintain compliance with the MSGP and FFCA/IP. Guidance on the appropriate use of BMPs should be coordinated through ENV-RCRA.</p> <p>Contact Jeff Walterscheid (Office: 667-3643, Cell: 699-0936, Email: jeffw@lanl.gov) or Terrill Lemke (Office: 665-2397, Cell: 699-0725, Email: tlemke@lanl.gov) with questions regarding BMP applications, installation, and maintenance. ENV-RCRA will also provide site inspections. If you would like to access a map of the SMA area, the GIS link can be obtained through Melanee Shurter (mshurter@lanl.gov). Jeff Walterscheid (ENV-RCRA) has been copied on this review and will contact the requester if a field inspection for FFCA BMP compliance is required.</p> <p>For information regarding FFCA SWPPP work requirements, or if you have questions or concerns, please contact Melanee Shurter (Office: 667-7369, Cell: 505-231-0520, Email: mshurter@lan.gov) or Steve Veenis (Office: 667-0013, Cell: 699-1764, Email: veenis@lanl.gov).</p>

Option	Project Impact	Guidance
3.	Project is directly located on a site that impacts a PRS on the Permit list, and is within a FFCA or Permit Drainage Area or impacts a sampler location.	<p>Based on further review to identify possible impacts and concerns for ENV-RCRA water quality per Multi Sector General Permit (MSGP) and Federal Facility Compliance Agreement (FFCA) requirements, your project is directly located on a site that impacts a PRS on the Permit list, and is within a FFCA or Permit Drainage Area or impacts a sampler location. [Identify the drainage site, samplers affected, PRSs affected].</p> <p>Please refer to the attached map and if further field consultation is needed regarding the impact to a PRS, you may contact either Paula Bertino (pmb@lanl.gov) or Phoebe Suina (phoebe@lanl.gov). This Project is located in the [name] Aggregate Area and may also require correspondence with the appropriate EP WES Project Leader. You should also refer to the PRS Project Review Comments submitted separately for more information about related action.</p> <p>Contact Jeff Walterscheid (Office: 667-3643, Cell: 699-0936, Email: jeffw@lanl.gov) or Terrill Lemke (Office: 665-2397, Cell: 699-0725, Email: tlemke@lanl.gov) with questions regarding BMP applications, installation, and maintenance. ENV-RCRA will also provide site inspections. If you would like to access a map of the SMA area, the GIS link can be obtained through Melanee Shurter (mshurter@lanl.gov). Jeff Walterscheid (ENV-RCRA) has been copied on this review and will contact the requester if a field inspection for FFCA BMP compliance is required.</p> <p>For information regarding FFCA SWPPP work requirements, or if you have questions or concerns, please contact Melanee Shurter (Office: 667-7369, Cell: 505-231-0520, Email: mshurter@lan.gov) or Steve Veenis (Office: 667-0013, Cell: 699-1764, Email: veenis@lanl.gov).</p>

Attachment 4 GIS Map Example



**ATTACHMENT 5
FIELD VISIT OF PR-ID OR EX-ID FIELD WORK FOR FFCA/IP COMPLIANCE**

FIELD VISIT OF PR-ID OR EX-ID FIELD WORK FOR FFCA/IP COMPLIANCE

PR/EX-ID # _____ Title: _____
 FFCA/IP Field Inspector: _____ Inspection Date: _____
 LANL Project Representative: _____ Group: _____ Phone: _____
 Site Representative: _____ Group: _____ Phone: _____

Inspection type: Prior to job start During field work Job Completion

GOAL: help construction field managers recognize situations that could lead to potential storm water contamination; and to provide instruction in proper spill prevention and response, good housekeeping, and materials management practices.

Complete the table below with the applicable YES, NO, or N/A.

Describe Or List Impacted Area(s) by FFCA or IP locations, SMA samplers	1 Potential Impact to FFCA or IP Sampler, Gage Station, or Drainage Area?	2 Is there potential for FFCA //IP PRS Impact?	3 Is Sediment or Erosion Transport Evident In Proposed Work Area?	4 Are Onsite Structures, Equipment, And Procedures Designed To Minimize Storm Water Pollution And Soil Erosion?	5 Are Good Housekeeping And Material Management Practices To Prevent Storm Water Pollution Being Implemented?	6 Are proper BMPs installed correctly?	7 Are BMPs functioning Correctly?	8 Is Maintenance Required?	9 Have Requirements Been Addressed?

* All Observations from the table need to be explained below

Observations/Comments:

This site has been found to be: IN COMPLIANCE DEFICIENT PER FFCA/IP

Inspector's Signature: _____ Date: _____
 LANL Rep. Signature: _____ Date: _____
 Site Rep. Signature: _____ Date: _____