LA-UR-14-20913

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> Title: Status Report, Los Alamos/Pueblo Watershed

July 1-December 31, 2013

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Intended for: **Public**

Purpose:

This Status Report has been prepared to facilitate public review of activities under the Individual Storm Water Permit (National Pollutant Discharge Elimination System Permit No. NM0030759) (IP). This report, not required by the IP, updates the 2012 Annual Report (published on March 1, 2013). Further, it summarizes precipitation, monitoring, inspection and maintenance, corrective action, and compliance status at specific solid waste management units and areas of concern listed in the IP. The report will be available on Los Alamos National Laboratory's public website established as required under Part I.I.7 of the IP.



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STATUS REPORT

Los Alamos/Pueblo Watershed July 1-December 31, 2013

INDIVIDUAL STORM WATER NPDES PERMIT No. NM0030759



OVERVIEW

Los Alamos National Security, LLC, under the direction of the National Nuclear Security Administration, has prepared this Status Report to facilitate public review of activities under the Individual Storm Water Permit (National Pollutant Discharge Elimination System Permit No. NM0030759) (IP). This report, not required by the IP, updates the 2012 Annual Report published on March 1, 2013. Further, for the July 1–December 31, 2013, time period, it summarizes precipitation, monitoring, inspection and maintenance, corrective action, and compliance status at specific solid waste management units and areas of concern, commonly referred to as "Sites." A previous report was prepared that summarizes these activities from January 1–June 30, 2013. Both reports will be available on Los Alamos National Laboratory's (the Laboratory's) public website established as required under Part I.I.7 of the IP. This website may be found at http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/index.php.

The site monitoring area (SMA) maps are available on the web (http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php) and are updated when any change is made.

Within the Los Alamos/Pueblo watershed, 101 Sites are monitored at 64 SMAs. Highlights of the work performed from July 1–December 31, 2013, include the following:

- Additional controls were installed at 8 SMAs, and no augmented controls were installed at any SMAs. No baseline control replacements were completed at any SMAs, and 2 enhanced controls were certified as corrective action measures.
- There were 19 measureable storm events, and 16 confirmation samples were collected. One hundred forty-eight storm event inspections were completed during the reporting period.
- As of December 31, baseline monitoring is continuing at 32 SMAs, corrective action was initiated at 18 SMAs (40 Sites), and no corrective action was required at any SMA. Six Sites were issued Certificates of Completion under the Compliance Order on Consent (the Consent Order).
- There were no incidents of noncompliance that could potentially endanger human health or the environment during this time period (July 1–December 31, 2013).

PRECIPITATION

Within the watershed, 5 precipitation gages monitor and report precipitation activity during the field season. These gages and their activity levels for the reporting period are shown in Table 1. There were 19 measurable storm events (an event with precipitation intensity of 0.25 in. within 30 min).

Table 1
Precipitation Activity for
July 1–December 31, 2013

Rain Gage	Related SMAs	Measurable Storm Events	Storm Event Inspections Conducted
RG-NCOM	3	07/12/2013 08/20/2013 09/12/2013 09/13/2013	2 3 3 0
RG-TA-53	6	07/25/2013 09/12/2013 09/13/2013 09/17/2013 09/21/2013 11/04/2013	6 6 0 0 0 5
RG038	34	07/12/2013 09/13/2013	31 34
RG055.5	16	07/12/2013 08/05/2013 09/12/2013 09/13/2013	16 16 16 0
RG121.9	5	07/12/2013 09/12/2013 09/13/2013	5 5 0

Adverse Weather

During the week of September 10, 2013, the Pajarito Plateau and much of New Mexico and Colorado were inundated with unprecedented rainfall. Rainfall totals in some areas of the Laboratory exceeded 7 in. in a 1-wk time period, and much of the rain fell during an extremely large event that occurred between September 12 and 13, 2013. These storm events were accompanied by record runoff, flooding, and erosion, resulting in a notification of Force Majeure.

MONITORING

Samplers Activated

Fourteen samplers were shut down and reactivated between July and September 2013. From these samplers, 4 samples were collected. Following sample collection, the samplers were shut down. The remaining samplers were shut down for the winter in December 2013.

Samples Collected

Sixteen confirmation samples were collected during the reporting period.

Sampler Placement

Samplers associated with monitoring locations for Sites were placed in accordance with coordinate locations provided in the Site Discharge Pollution Prevention Plan, Revision 1, Volume 1 (SDPPP, R1, V1).

INSPECTION AND MAINTENANCE

Post-Storm Inspections

One hundred forty-eight post-storm inspections were required for the Sites because of the 19 measurable storm events that were observed during the reporting period.

Visual Inspections

No visual inspections were required to be conducted during the reporting period.

Significant Event Inspections

One significant event that could impact control measures and environmental conditions occurred during the reporting period and is discussed under Adverse Weather.

Annual Erosion Inspections

Annual erosion reevaluation inspections were conducted at all 64 SMAs, as required under Part I.G.1 of the IP.

Construction Inspections

No construction inspections were conducted.

Control Maintenance

Sixty-five control maintenance activities were conducted.

CORRECTIVE ACTION

Augmented Control Installations

Additional controls were installed at 8 SMAs and are presented in Appendix A. The additional controls were installed at these Sites to "augment" baseline controls; these Sites are not in corrective action because monitoring has not shown a target action level (TAL) exceedance.

Baseline Control Replacements

No baseline control replacements were completed. The purpose of a control replacement is to maintain or upgrade the existing certified baseline controls at an SMA.

Enhanced Control Installations

When a sample that exceeds TALs is collected from an SMA, the associated Sites advance to corrective action. One of the corrective action options is to construct enhanced controls. Enhanced controls were installed at 4 SMAs:

- P-SMA-2.2 on July 31, 2013
- R-SMA-1 on August 7, 2013
- LA-SMA-5.02 on August 7, 2013
- R-SMA-1.95 on August 20, 2013, and September 4, 2013

When all the enhanced controls are installed, a certification of the installed controls is submitted to the U.S. Environmental Protection Agency (EPA) and New Mexico Environment Department (NMED) and is made available on the IP website. Enhanced controls were certified at 2 SMAs:

DP-SMA-0.3 and LA-SMA-5.91 on July 8, 2013

Compliance Status Categories

Compliance status is tracked for each Site throughout the year. The categories used for tracking include the following.

- Baseline Confirmation Complete—All confirmation monitoring results for all pollutants of concern at the SMA are at or below TALs, and corrective action is not required at the Sites. No further sampling is required.
- Baseline Monitoring Extended—Baseline confirmation
 monitoring is in progress, and no storm water from a
 measurable storm event has been collected. There has been
 no TAL exceedance.
- Corrective Action Initiated—A sample was collected during baseline confirmation monitoring, and analytical results show at least one pollutant concentration is above TALs, resulting in initiation of corrective action. Corrective action may include
 - installing enhanced control measures,
 - installing control measures that totally retain storm water,
 - installing control measures that totally eliminate the exposure of pollutants, or
 - receiving a Certificate of Completion from NMED.
- Enhanced Control Corrective Action Monitoring—
 Confirmation monitoring at an SMA is initiated to determine
 how well enhanced controls are performing. This monitoring
 occurs after certification that the enhanced control measures
 have been installed and are complete.
- Corrective Action Complete—Completion of corrective action is demonstrated by one of the following:
 - Analytical results from enhanced control monitoring show pollutant concentrations for all pollutants of concern at the Site to be at or below applicable TALs.
 - 2. Control measures that totally retain and prevent the discharge of storm water have been installed at the Site.
 - Control measures that totally eliminate exposure of pollutants to storm water have been installed at the Site.
 - The Site has achieved Resource Conservation and Recovery Act "no further action" status or a Certificate of Completion from NMED.

COMPLIANCE STATUS

Baseline Confirmation Complete

Baseline confirmation monitoring was completed on August 21, 2011, for ACID-SMA-1.05 [1 associated Site: 00-030(g)] and on June 14, 2013, for R-SMA-2.3 [1 associated Site: 00-011(e)]. No TAL exceedances were observed per Part I.D.4 (b) of the IP. For this reason, corrective action is not required for these Sites, and monitoring is no longer required for the duration of the IP.

Baseline Monitoring Extended

As of December 31, 2013, baseline monitoring is continuing at 32 SMAs (45 Sites). A confirmation monitoring sample has not been collected at these SMAs. Baseline monitoring will be extended under the IP until analytical results have been received from the first confirmation sample collected.

Corrective Action Initiated, Planning Started

As of December 31, 2013, corrective action has been initiated at 18 SMAs (40 Sites). See Appendix B for a list of these SMAs and associated Sites.

Enhanced Control Corrective Action Monitoring

As of December 31, 2013, enhanced control corrective action monitoring has started at 6 SMAs (9 Sites).

Corrective Action Complete

Six Sites were issued a Certificate of Completion under the Consent Order and have completed corrective action; the Sites are presented in Appendix B. Documentation certifying completion of corrective action for these Sites will be submitted to EPA.

DOCUMENTS SUBMITTED

From July 1-December 31, 2013, no new IP Program documents were submitted to EPA Region 6.

IP documents submitted in 2013 can be found on the IP website at http://www.lanl.gov/community-environmental-stewardship/protection/compliance/individual-permit-stormwater/index.php.

APPENDIX A
Additional Controls Installed between July 1–December 31, 2013

Site Monitoring Area	Control Description	Install Date	Control Category
	L012A03060016 Straw Wattles	11/06/2013	Additional Control
	L012A03060017 Straw Wattles		
	L012A03060018 Straw Wattles		
LA-SMA-5.53	L018B03060008 Straw Wattles	11/05/2013	Additional Control
	L018B03060009 Straw Wattles		
LA-SMA-5.54	L018C03060009 Straw Wattles	11/05/2013	Additional Control
	L018C03060010 Straw Wattles		
LA-SMA-6.25	L02003060008 Straw Wattles	07/19/2013	Additional Control
	L02003060009 Straw Wattles	11/15/2013	Additional Control
	L02003060010 Straw Wattles		
LA-SMA-6.27	L02103060012 Straw Wattles	11/15/2013	Additional Control
	L02103060013 Straw Wattles		
P-SMA-2.2	P00803060026 Straw Wattles	07/31/2013	Additional Control
R-SMA-0.5	R00103060026 Straw Wattles	07/22/2013	Additional Control
	R00103060027 Straw Wattles		
R-SMA-2.3	R00503060005 Straw Wattles	11/13/2013	Additional Control
	R00503060006 Straw Wattles		
	R00503060007 Straw Wattles		

APPENDIX B

Corrective Action Status for Site Monitoring Areas and
Sites as of December 31, 2013, within the Los Alamos/Pueblo Watershed

Site Monitoring Area	Site	Corrective Action Status*
ACID-SMA-1.05	00-030(g)	BCComp
ACID-SMA-2	01-002(b)-00 45-001 45-002 45-004	CAI
ACID-SMA-2.1	01-002(b)-00	CAI
B-SMA-0.5	10-001(a) 10-001(b) 10-001(c) 10-001(d) 10-004(a) 10-004(b) 10-008 10-009	CAI
B-SMA-1	00-011(d)	CAI
DP-SMA-0.3	21-029	CAI2
DP-SMA-0.4	21-021	CAI
DP-SMA-2.35	21-021 21-024(n)	CAI
DP-SMA-3	21-013(c) 21-021	CAM5
LA-SMA-0.85	03-055(c)	CAI2
LA-SMA-1	00-017 C-00-044	CAM5
LA-SMA-1.1	43-001(b2)	CACompD
LA-SMA-1.25	C-43-001	CAI2
LA-SMA-2.1	01-001(f)	CAI
LA-SMA-2.3	01-001(b)	CACompD
LA-SMA-4.1	01-003(b) 01-006(b)	CAI
LA-SMA-5.02	01-003(e)	CACompD
LA-SMA-5.31	41-002(c)	CAM5
LA-SMA-5.33	32-004	CACompD
LA-SMA-5.35	C-41-004	CAM5

Site Monitoring Area	Site	Corrective Action Status*
LA-SMA-5.51	02-003(a) 02-003(e) 02-004(a) 02-005 02-006(b) 02-006(c) 02-006(e) 02-008(a) 02-009(b) 02-011(a) 02-011(b) 02-011(c) 02-011(d)	CAI
LA-SMA-5.54	02-009(c)	CAI
LA-SMA-5.91	21-009 21-021 21-027(d)	CAM5
	21-023(c)	CACompD
LA-SMA-5.92	21-013(b) 21-013(g) 21-018(a) 21-021	CAI
LA-SMA-6.395	21-021 21-024(j)	CAI
LA-SMA-10.12	53-008	CAM5
P-SMA-0.3	00-018(b)	CA CompD
P-SMA-3.05	00-018(a)	CAI
R-SMA-0.5	C-00-020	CA CompD
R-SMA-1	C-00-041	CAI
R-SMA-1.95	00-015	CAI

^{*}BCComp: From the Individual Storm Water Permit (IP), Part D4(b)—All results for all pollutants of concern at SMA are at or below the target action levels, and no further sampling is required at the SMA.

CACompD: From the IP, Part I.E.2(d)—A Site has achieved Resource Conservation and Recovery Act "corrective action complete" status or a Certificate of Completion under the Compliance Order on Consent. Collect no sample.

CAI and CAI2: From the IP, Part I.E.1(a)—Baseline or enhanced control confirmation monitoring has exceeded a target action level, and the corrective action response is being planned.

CAM3 and CAM5: From the IP, Part I.E.4(a)(b)—Collect one or more samples after completion of corrective action control measures at moderate priority sites within 5 yr or at high priority sites within 3 yr of effective date of permit.