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Title: Status Report, Los Alamos/Pueblo Watershed

January 1-June 30, 2014

Author(s): | Steve Veenis

Intended for: | Public

Purpose:

This Status Report has been prepared to facilitate public review of activities under the Individual Permit for Storm Water (IP) (National Pollutant Discharge Elimination System Permit No. NM0030759). This report, not required by the IP, updates the 2013 Annual Report (published on March 1, 2014). 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 January 1–June 30, 2014

INDIVIDUAL PERMIT FOR STORM WATER NPDES PERMIT No. NM0030759



OVERVIEW

Los Alamos National Security, LLC, under the direction of the U.S. Department of Energy, has prepared this Status Report to facilitate public review of activities under the Individual Permit for Storm Water (IP) (National Pollutant Discharge Elimination System Permit No. NM0030759). This report, not required by the IP, updates the 2013 Annual Report published on March 1, 2014. Further, for the January 1–June 30, 2014, 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." This report 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 January 1–June 30, 2014, include the following:

- Additional controls were installed at 6 SMAs, and augmented controls were installed at 1 SMA.
 No baseline control replacements were completed at any SMAs, and 1 enhanced control was certified as a corrective action measure.
- There was 1 measureable storm event, and no confirmation samples were collected. Three storm event inspections were completed during the reporting period.
- As of June 30, baseline monitoring is continuing at 32 SMAs, corrective action was initiated at 17 SMAs (23 Sites), and no corrective action was required at any SMA.
- There were no incidents of noncompliance that could potentially endanger human health or the environment during this time period (January 1–June 30, 2014).

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 was 1 measurable storm event (an event with precipitation intensity of 0.25 in. within 30 min).

Adverse Weather

No adverse weather events affected IP activities.

MONITORING

Samplers Activated

Forty samplers were activated at the beginning of this field sampling season (April 1, 2014).

Table 1 Precipitation Activity for January 1–June 30, 2014

Rain Gage	Related SMAs	Measurable Storm Events	Storm Event Inspections Conducted
RG-NCOM	3	05/23/2014	3
RG-TA-53	6	None	0
RG038	34	None	0
RG055.5	16	None	0
RG121.9	5	None	0

Samples Collected

No 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

Three post-storm inspections were required for the Sites because of the 1 measurable storm event that was observed during the reporting period.

Visual Inspections

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

Significant Event Inspections

No significant event that could impact control measures and environmental conditions occurred that required a Site to be reevaluated and inspected under Part I.G.1 of the IP.

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

A construction inspection was conducted at 1 SMA.

Control Maintenance

Thirty-one control maintenance activities were conducted.

CORRECTIVE ACTION

Augmented Control Installations

Additional controls were installed at 6 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. No enhanced controls were installed at any SMA.

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 1 SMA:

LA-SMA-5.51 on June 27, 2014

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.

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.
 - Control measures that totally retain and prevent the discharge of storm water have been installed at the Site.
 - c. Control measures that totally eliminate exposure of pollutants to storm water have been installed at the Site.
 - d. The Site has achieved Resource Conservation and Recovery Act "no further action" status or a Certificate of Completion from NMED.

Baseline Monitoring Extended

As of June 30, 2014, 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 June 30, 2014, corrective action has been initiated at 17 SMAs (30 Sites). See Appendix B for a list of these SMAs and associated Sites.

Enhanced Control Corrective Action Monitoring

As of June 30, 2014, enhanced control corrective action monitoring has started at 7 SMAs (23 Sites).

Corrective Action Complete

As of June 30, 2014, six Sites have been issued a Certificate of Completion under the Consent Order and have completed corrective action. Documentation certifying completion of corrective action for these Sites will be submitted to EPA.

DOCUMENTS SUBMITTED

From January 1-June 30, 2014, four new IP Program documents were submitted to EPA Region 6.

- 2013 Storm Water Individual Permit Annual Report, March 1, 2014
- 2013 Storm Water Individual Permit Compliance Status Reports (discharge monitoring reports), March 1, 2014
- Storm Water Individual Permit Renewal Application, March 27, 2014
- Updates to the SDPPP, R1, Volumes 1–5, May 1, 2014

IP documents submitted in 2014 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 and Baseline Controls Replaced between January 1–June 30, 2014

Site Monitoring Area	Control Description	Install Date	Control Category
LA-SMA-0.9	L00203010021 Earthen Berm	06/04/2014	Additional Control
	L00203010022 Earthen Berm		
	L00203010024 Earthen Berm		
	L00203010025 Earthen Berm		
LA-SMA-5.01	L01203060013 Straw Wattles	04/21/2014	Additional Control
LA-SMA-5.54	L018C03060011 Straw Wattles	03/03/2014	Additional Control
	L018C03060012 Straw Wattles		
LA-SMA-5.92	L019A03140008 Coir Log	01/29/2014	Additional Control
	L019A06020009 Log Check Dam		
	L019A06020010 Log Check Dam		
LA-SMA-6.27	L02106010014 Rock Check Dam	01/30/2014	Additional Control
	L02106010015 Rock Check Dam		
	L02106010016 Rock Check Dam		
	L02106010017 Rock Check Dam		
P-SMA-0.3	P00403140009 Coir Log	05/08/2014	Additional Control
	P00406010010 Rock Check Dam		
	P00406010011 Rock Check Dam		
	P00906010012 Rock Check Dam		
	P00406010013 Rock Check Dam		
	P00406010014 Rock Check Dam		
	P00803010028 Earthen Berm		
	P00803010029 Earthen Berm		
	P00803010030 Earthen Berm		

APPENDIX B

Corrective Action Status for Site Monitoring Areas and
Sites as of June 30, 2014, 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)	CAM3
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)	CACompD
P-SMA-3.05	00-018(a)	CAI
R-SMA-0.5	C-00-020	CACompD
R-SMA-1	C-00-041	CAI
R-SMA-1.95	00-015	CAI

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

CACompD = Corrective action complete, subpart d. 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 = Corrective action initiated, and CAI2 = second corrective action initiated. 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 = Enhanced control corrective action monitoring. 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 (CAM5) or at high priority sites within 3 yr (CAM3) of effective date of permit.