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Title:	Status Report, Sandia/Mortandad Watershed January 1–June 30, 2014
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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

Sandia/Mortandad 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 (<u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>) and are updated when any change is made.

Within the Sandia/Mortandad watershed, 119 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 3 SMAs, and no augmented controls were installed at any SMAs. Baseline control replacements were completed at 1 SMA, and enhanced controls were certified as corrective action measures at 3 SMAs.
- Forty samplers were activated. There were 6 measureable storm events, and no confirmation samples were collected. Twenty-four storm event inspections were completed during the reporting period.
- As of June 30, 2014, baseline monitoring is continuing at 33 SMAs, and corrective action was initiated at 17 SMAs (54 Sites).
- 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, 7 precipitation gages monitor and report precipitation activity during the field season. These gages and their activity levels from January 1–June 30, 2014, are shown in Table 1. There were 6 measurable storm events (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 1Precipitation Activity forJanuary 1–June 30, 2014

Rain Gage	Related SMAs	Measurable Storm Events	Storm Event Inspections Conducted
RG-TA-06	2	05/23/2014 05/25/2014	0 2
RG-TA-53	5	None	0
RG-TA-54	1	05/22/2014 06/07/2014	1 1
RG121.9	13	None	0
RG200.5	23	None	0
RG203	12	05/22/2014	12
RG245.5	8	06/07/2014	8

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 2, (SDPPP, R1, V2).

INSPECTION AND MAINTENANCE

Post-Storm Inspections

Twenty-four post-storm inspections were required for the Sites because of the 6 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

No significant events that could impact the 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

No construction inspections were conducted.

Control Maintenance

Twenty-eight control maintenance activities were conducted.

CORRECTIVE ACTION

Augmented Control Installations

Additional controls were installed at 3 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.

The categories used for tracking include the following:

Baseline Control Replacements

Baseline control replacements were completed at 1 SMA and are presented in Appendix A. 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 SMAs.

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 3 SMAs:

- T-SMA-1 on May 12, 2014
- PRATT-SMA-1.05 on May 13, 2014
- S-SMA-0.25 on June 26, 2014

COMPLIANCE STATUS

Baseline Confirmation Complete

Baseline confirmation monitoring was completed on September 13, 2013, for M-SMA-10.3 [2 associated Sites: 35-014(e2) and 35-016(i)]. 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 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.

Compliance Status Categories

Compliance status is tracked for each Site throughout the year.

- 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 a 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.
 - b. 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 33 SMAs (60 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 (32 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 9 SMAs (24 Sites).

Corrective Action Complete

As of June 30, 2014, 9 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.

Alternative Compliance Requested

As of June 30, 2014, alternative compliance has been requested for 3 SMAs. See Appendix B for a list of these SMAs and associated Sites.

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 <u>http://www.lanl.gov/community-</u>environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/index.php.

Site Monitoring Area	Control Description	Install Date	Control Category
S-SMA-4.1	S01103060013 Straw Wattles	02/18/2014	Additional Control
	S01103060012 Straw Wattles	02/19/2014	
S-SMA-5	S01303030009 Log Berm	03/14/2014	Additional Control
	S01301040010 Seeding	03/18/2014	
S-SMA-5	S01303060008 Straw Wattles	03/18/2014	Replaced Baseline Control
T-SMA-6.8	T00803060005 Straw Wattles	02/13/2014	Additional Control
	T00803060006 Straw Wattles		
	T00803060007 Straw Wattles		

APPENDIX A Additional Controls Installed between January 1–June 30, 2014

Sites as of June 30, 2014, within the Sandia/Mortandad Watershed				
Site Monitoring Area	Site	Corrective Action Status*		
CDB-SMA-0.25	46-004(c2) 46-004(e2)	CAI2		
CDB-SMA-0.55	46-004(g) 46-004(m) 46-004(s) 46-006(f)	CAI		
CDB-SMA-1	46-003(c) 46-004(d2) 46-004(f) 46-004(t) 46-004(w) 46-008(g) 46-009(a)	CAM5		
	C-46-001	CACompD		
CDB-SMA-4	54-017 54-018 54-020	CAI		
M-SMA-1	03-050(a) 03-054(e)	CAI2		
M-SMA-1.2	03-049(a)	CAI		
M-SMA-1.22	03-045(h)	CAM5		
M-SMA-3	48-001 48-005 48-007(c)	CAI		
M-SMA-4	48-001 48-005	CAI		
	48-007(a) 48-007(d) 48-010	CACompD		
M-SMA-6	35-016(h)	CAI		
M-SMA-7	36-016(g)	CAI		
M-SMA-7.9	50-006(d)	AltCompR		
M-SMA-10	35-008 35-014(e)	CAI		
M-SMA-10.01	35-016(e)	CAM5		
M-SMA-10.3	35-014(e2) 35-016(i)	CACompD		
M-SMA-12.6	05-004	CAI		

APPENDIX B

Corrective Action Status for Site Monitoring Areas and

Site Monitoring Area	Site	Corrective Action Status*
Pratt-SMA-1.05	35-003(h) 35-003(p) 35-003(r) 35-004(h) 35-009(d) 35-016(k) 35-016(l) 35-016(m)	CAM3
S-SMA-0.25	03-013(a) 03-052(f)	CAM3/AltCompR
S-SMA-1.1	03-029	CAM3
S-SMA-2	03-012(b) 03-045(b) 03-045(c)	AltCompR
	03-056(c)	CACompD
S-SMA-2.01	03-052(b)	CAM3
S-SMA-3.53	03-014(b2)	CAM3
S-SMA-3.6	60-007(b)	CAI2
S-SMA-3.95	20-002(a)	CAI
S-SMA-4.1	53-014	CACompD
S-SMA-6	72-001	CAI
T-SMA-1	50-006(a) 50-009	CAM3
T-SMA-2.85	35-014(g) 35-016(n)	CAI
T-SMA-3	35-016(b)	CAI
T-SMA-4	35-004(a) 35-009(a) 35-016(c) 35-016(d)	CAI

* AltCompR = Alternative compliance requested. From the Individual Permit for Storm Water (IP), Part E.3(b)—Alternative compliance requested.

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.

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.