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Title: Status Report, Pajarito 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

Pajarito 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 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 Pajarito watershed, 60 Sites are monitored at 51 SMAs. Highlights of the work performed from January 1–June 30, 2014, include the following items.

- Additional controls were installed at 2 SMAs, and no augmented controls were installed at any SMAs. No baseline control replacements were completed at any SMAs, and no enhanced controls were installed as corrective action measures at any SMAs.
- Thirty-one samplers were activated. There were 11 measureable storm events, and 2 confirmation samples were collected. Seventy-four storm event inspections were completed during the reporting period.
- As of June 30, 2014, baseline monitoring is continuing at 19 SMAs, corrective action was initiated at 17 SMAs (24 Sites), and no corrective action was required at 2 SMAs.
- 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, 8 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 11 measurable storm events, (an event with precipitation intensity of 0.25 in. within 30 min).

Adverse Weather

No adverse weather events affected IP activities.

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

Rain Gage	Related SMAs	Measurable Storm Events	Storm Event Inspections Conducted
RG-TA-06	21	05/23/2014 05/25/2014 06/21/2014	0 21 21
RG-TA-54	5	05/22/2014 06/07/2014	5 5

September 2014

MONITORING

Samplers Activated

Thirty-one samplers were activated at the beginning of this field season (April 1, 2014).

Samples Collected

Two confirmation samples were collected during the reporting period.

Sampler Placement

Samplers associated with monitoring locations for Sites were placed in accordance with coordinate locations

Measurable **Storm Event** Related Storm Inspections Rain Gage **SMAs Events** Conducted RG121.9 4 None n 5 0 RG240 None RG245.5 11 06/07/2014 11 06/21/2014 3 RG253 0 1 None

05/23/2014

05/23/2014

06/07/2014

06/21/2014

2

2

2

2

Table 1 (continued)

Precipitation Activity for January 1–June 30, 2014

provided in the Site Discharge Pollution Prevention Plan, Revision 1, Volume 3 (SDPPP, R1, V3).

2

2

RG257

RG262.4

INSPECTION AND MAINTENANCE

Post-Storm Inspections

Seventy-four post-storm inspections were required for the Sites because of the 11 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 51 SMAs as required under Part I.G.1 of the IP.

Construction Inspections

No construction inspections were conducted.

Control Maintenance

Twenty-one control maintenance activities were conducted.

CORRECTIVE ACTION

Augmented Control Installations

Additional controls were installed at 2 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.

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. No enhanced controls were certified at any SMAs.

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 measurable storm events 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.

COMPLIANCE STATUS

Baseline Confirmation Complete

Baseline confirmation monitoring was completed on August 18, 2011, for PJ-SMA-14.8 [1 associated Site: 18-012(a)]; on September 9, 2012, for 2M-SMA-2.5 [1 associated Site: 40-001(c)]; and on August 8, 2013, for PJ-SMA-16 [1 associated Site: 27-002]. 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 June 30, 2014, baseline monitoring is continuing at 19 SMAs (23 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 (24 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 11 SMAs (12 Sites).

Corrective Action Complete

As of June 30, 2014, corrective action has been completed at PJ-SMA-20 (Site 54-017). Installed control measures have totally eliminated exposure of pollutants to storm water. Documentation certifying completion of corrective action for this Site has been 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 between January 1–June 30, 2014

Site Monitoring Area	Control Description	Install Date	Control Category
PJ-SMA-7	J00803040007 Asphalt Berm	04/22/2014	Additional Control
PJ-SMA-11.1	J01403060017 Straw Wattles	04/28/2014	Additional Control
	J01403060018 Straw Wattles		
	J01403060019 Straw Wattles		

APPENDIX B

Corrective Action Status for Site Monitoring Areas and Sites as of June 30, 2014, within the Pajarito Watershed

Site Monitoring Area	Site	Corrective Action Status*
2M-SMA-1	03-010(a)	CAI2
2M-SMA-1.42	06-001(a)	CAM5
2M-SMA-1.43	22-014(a) 22-015(a)	CAI
2M-SMA-1.44	06-001(b)	CAM5
2M-SMA-1.45	06-006	CAM5
2M-SMA-1.65	40-005	CAM5
2M-SMA-1.7	03-055(a)	CAM5
2M-SMA-1.8	03-001(k)	CAI
2M-SMA-1.9	03-003(a)	CAI
2M-SMA-2	03-050(d) 03-054(b)	CAI
2M-SMA-2.2	03-003(k)	CAI
2M-SMA-3	07-001(a) 07-001(b) 07-001(c) 07-001(d)	CAI
3M-SMA-0.4	15-006(b)	CAI
PJ-SMA-1.05	09-013	CAI
PJ-SMA-3.05	09-004(o)	CAM5
PJ-SMA-4.05	09-004(g)	CAI
PJ-SMA-5	22-015(c)	CAI
PJ-SMA-5.1	22-016 22-010(b)	CAM5
PJ-SMA-11	40-003(a)	CAI
PJ-SMA-11.1	40-003(b)	CAI
PJ-SMA-13.7	18-010(b)	CAM5
PJ-SMA-17	54-018	CAI
PJ-SMA-18	54-014(d) 54-017	CAI
PJ-SMA-19	54-013(b) 54-017 54-020	CAI
PJ-SMA-20	54-017	CACompC
STRM-SMA-1.05	08-009(f)	CAI2
STRM-SMA-1.5	08-009(d)	CAM5

Site Monitoring Area	Site	Corrective Action Status*
STRM-SMA-4.2	09-008(b)	CAM5
STRM-SMA-5.05	09-013	CAM5

^{*}CACompC = Corrective action complete, subpart c. From the Individual Permit for Storm Water (IP), Part E2(c)—Control measures installed to totally eliminate exposure of pollutants to storm water. Collect 1 informational 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.