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*Date:* **SEP 26 2017**  
*Refer To:* ADESH-17-064  
*LAUR:* n/a

Esteban Herrera, Chief  
 Water Enforcement Branch (6EN-WS)  
 Compliance Assurance and Enforcement Division  
 U.S. Environmental Protection Agency, Region 6  
 1445 Ross Avenue, Suite 1200  
 Dallas, Texas 75202-2733

**Subject: NPDES Permit No. NM0030759 - Sampling Implementation Plan Update on Sampling Location Evaluations Performed with New Mexico Environment Department Surface Water Quality Bureau**

Dear Mr. Herrera:

This letter provides the U.S. Environmental Protection Agency (EPA) with an update regarding evaluations of site monitoring area (SMA) sampler locations undertaken by Los Alamos National Laboratory (the Laboratory) in conjunction with the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) as part of the National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 for the Laboratory, issued to Los Alamos National Security, LLC (LANS) and the U.S. Department of Energy (DOE), effective November 1, 2010.

The July 21, 2015, NMED State Certification for the proposed Los Alamos National Laboratory Individual Storm Water Permit, Comment 1, page 6, states,

...NMED is requiring the development of a Sampling Implementation Plan (SIP) which will be updated annually as part of their permit. ... This SIP would be developed by the Permittees through a review process with NMED SWQB. Based on evaluations of site knowledge, including site history, available soil sampling data within the top 3 feet of soil, as well as downstream water quality data, the implementation of this requirement will ensure that monitoring locations and parameters at the various sites under this permit are necessary and appropriate to evaluate compliance with state water quality standards. If, due to this evaluation, Permittees identify a more appropriate site monitoring location, they will be required to move the Site Monitoring Area (SMA) sampler as soon as possible.

Since 2016, representatives from NMED-SWQB, NMED-DOE Oversight Bureau (OB), the Laboratory and DOE Environmental Management Los Alamos Field Office (EM-LA) (the Parties) have met to review documentation regarding site knowledge and have conducted field visits for SMAs and Sites regulated by the Individual Permit. This review determines the most representative sampler location for each SMA and meets the sampling implementation plan (SIP) requirements for monitoring locations described in the State Certification. This process began before renewal of the existing Individual Permit to: (1) resolve past NMED-SWQB Compliance Inspections comments regarding representative monitoring for SMAs and (2) to ensure representative monitoring locations were selected in a timely manner because the State Certification provided only 1 year following permit renewal to complete the SIP requirements, and all parties agreed this time frame was insufficient to review all 250 SMAs and 405 Sites on the Permit.

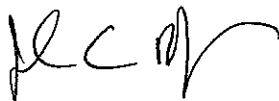
As of the date of this letter, 233 SMA/Site monitoring locations have been reviewed and agreement has been reached among all parties regarding the most representative storm water sampler locations. Of these, all parties have agreed that 208 SMA/Site sampler locations are currently representative and no move is required, and 25 SMA/Site sampler locations require a sampler move. Agreements on sampler location are documented on a map signed by all Party representatives, with the exception of NMED DOE-OB (whose role is oversight). Signature maps have been uploaded to the website for the Individual Permit and can be accessed at the following website <http://www.lanl.gov/> and searching under the key words "Individual Permit" and selecting "Sampling Implementation Plan."

In May 2017, the Permittees moved the samplers to agreed-upon locations shown on the signature map before monitoring began in 2017. After this time, any SMA sampler locations that require a move will be relocated in the upcoming monitoring year. The annual Site Discharge Pollution Prevention Program will document all sampler moves that occurred through this process or for any other reason.

The SIP process also reviews and determines constituents for monitoring. While all parties have discussed constituents for monitoring at these locations, any changes to the monitoring list based upon this process will not be conducted until after the Individual Permit is renewed and target action levels are updated, and the SIP documentation is formally submitted to EPA.

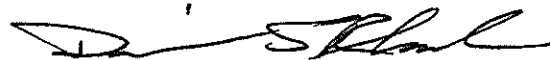
If you have any questions, please contact Terrill Lemke at (505) 665-2397 ([tlemke@lanl.gov](mailto:tlemke@lanl.gov)) or David Rhodes at (505) 665-5325 ([david.rhodes@em.doe.gov](mailto:david.rhodes@em.doe.gov)).

Sincerely,



John Bretzke, Division Leader  
Environmental Protection & Compliance Division  
Los Alamos National Laboratory

Sincerely,



David S. Rhodes, Director  
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Los Alamos Environmental Management  
Field Office

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Public Reading Room (EPRR)  
ADESH Records  
PRS Database