



Department of Energy

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

JUN 16 1997

Dr. Ed Kelley, Acting Bureau Chief
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New Mexico Environment Department
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P. O. Box 26110
Santa Fe, NM 87502

Ms. Marcy Leavitt, Bureau Chief
Ground Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

Dear Dr. Kelley and Ms. Leavitt:

Subject: Minutes of Monthly Meeting with Water Quality Bureaus

Enclosed is a copy of the minutes for the monthly meeting on May 9, 1997 with the New Mexico Environment Department (NMED) Surface Water Quality Bureau and the Ground Water Quality Bureau. The meeting also included staff members from the NMED Hazardous and Radioactive Materials Bureau; the Department of Energy (DOE) Oversight Bureau; and the Los Alamos National Laboratory (LANL) Environmental Restoration (ER) and Water Quality and Hydrology (ESH-18) groups. The meeting minutes have been reviewed by members of your staff to ensure that accurate documentation is entered into the minutes.

DOE would like to thank you for meeting with LANL to discuss important issues and planning in the area of water quality. The next meeting is planned for July 16, 1997, at 8:30 a.m. at your offices in Santa Fe. LANL looks forward to meeting with you then.

Sincerely,


Joseph C. Vozella
Assistant Area Manager
Office of Environment and Projects

LAAMEP:3BK-007

Enclosure

cc:
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M. Alexander, ESH-18, LANL, MS-K497
J. White, ESH-19, LANL, MS-K490
A. Puglisi, ESH-19, LANL, MS-K498
EM/ER File, LANL, MS-M992
RPF, LANL, MS-M707
D. Griswold, ERD, AL



Meeting Notes

Monthly Meeting with the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) and Ground Water Quality Bureau (GWQB)

May 9, 1997

1. Completion of Waste Stream Corrections (WSC) Project - Steve Rae/Mike Saladen
Steve Rae, ESH-18, LANL, briefly covered the history of WSC from about 1990, the date of the NPDES Permit reapplication, to the recent completion in March 1997. Post-completion activities include continuing to track new waste streams generated by any changes at facilities.

Mike Saladen, ESH-18, LANL, also briefly reviewed the Administrative Order (AO) and Federal Facilities Compliance Agreement (FFCA) deadlines, discussed LANL accomplishments, and talked about ongoing activities as a result of WSC. He explained that 51 drains must be unplugged because of safety issues. Designs have been generated for the work which will ensure that the eliminated discharges remain eliminated. Ralph Ford-Schmidt with the DOE Oversight Bureau (DOE/OB) asked to hear more about how the facility ensures that an eliminated discharge is not reinitiated. Rae explained that a letter is being prepared for each Facility Management (FM) Unit listing the corrections in place and the maintenance requirements for the waste streams in the FM. Laboratory Implementation Requirements (LIR) are also being prepared to ensure that permit requirements, and requirements in general for waste streams are met. Mike Alexander, ESH-18, LANL, mentioned that excavation permits are required for unplugging activities, and that ESH-18 reviews these permits. Steve Rae suggested that DOE/OB inspect the 33 permitted outfalls that are eliminated by the WSC program. Michael Dale, DOE/OB, asked a question about controls for non-NPDES-permitted constituents leaving outfalls. Rae said that samplers still visit permitted outfalls that are dry, but that have not been plugged, to document discharge status over a set period of time, usually at least six months. Outfalls are eliminated only after verification by ESH-18 and DOE/OB personnel. The ESH-ID process tracks new waste streams.

Action Item: NMED requests a list of the 51 unplugged drains¹. Tina Sandoval with ESH-18 is responding to the request.

2. Development of NPDES Permit Application - Mike Saladen
Mike Saladen explained that 88 outfalls remain on the NPDES Permit. Thirty-three of these were eliminated by WSC. During reapplication, LANL will request that a total of 55 outfalls be removed from the current permit. A spreadsheet of all outfalls was given to Barbara Hoditschek. Saladen explained that some outfalls will still drain storm water and

¹NMED requested the list during a field visit which followed soon after the meeting.

this is shown on the spreadsheet. The information is given to Mike Alexander, ESH-18, who will make appropriate revisions to the storm water permit. LANL will reduce the number of outfalls to approximately 30 this year. Steve Rae explained that long-term planning calls for outfall reduction to potentially only four outfalls: SWSC, TA-3 Power Plant, HEWTF, and TA-50 RLWTF. These four outfalls are considered primary and the others are secondary. The WSC database will be used to actually download parts of the reapplication information into the application. This downloading process will first need to be approved by the Environmental Protection Agency (EPA), but no problems are anticipated because the database is designed to match EPA's form. Saladen discusses how operational sampling will also be used to support the reapplication process. ESH-18 plans to begin sampling in June and July of this year for the NPDES reapplication. Ralph Ford-Schmidt asked about storm water discharges from outfalls potentially running across Solid Waste Management Units (SWMU). Mike Alexander said that this is checked during the development of a storm water pollution prevention plan for the outfall.

3a. NOIs and Related Topics, General NOIs - Mike Saladen

Barbara Hoditschek mentioned that her concern for potable releases and coverage under the general NOI is the potential for the water to cross a SWMU. Hoditschek also said that she feels the language in the NOI may not be specific enough and may just require updating. Further discussion on this topic is deferred to a separate meeting on June 4, 1997 at LANL.

3b. Investigation Derived Waste Issues - Pat Shanley and Alex Puglisi

Alex Puglisi said that the ER Project may have to deal with well purge waters with very, very low levels of listed waste. Marcy Leavitt had indicated to Alex that the GWQB does not need notification outside the general NOI unless constituents in the purge water are above a WQCC standard. Hoditschek said she would like a letter from Leavitt indicating this. The topic was also deferred to the meeting on June 4, 1997. John Rogers, GWQB, said he would try to get the information from Leavitt for this meeting.

4. ESH-18's Portion of AP-4.5 - Mike Alexander, Steve Rae

Mike Alexander reported that ESH-18 is ready to go into the field and would like DOE/OB members to accompany them. An agreement was made to schedule times with DOE/OB and SWQB.

5. Release Notification - Alex Puglisi/Mike Saladen

NMED Hazardous and Radioactive Materials Bureau (HRMB) indicated that a letter from Ed Kelley on this topic had just left NMED. ESH-18 provided a draft copy of the upgraded release notification form for "operational releases" to NMED. ESH-19 provided comments regarding the NMED notification form. After this, a decision was made to defer discussion of this topic until after LANL has received and reviewed the letter from Ed Kelley.

6. Update on Spills and Spill Closeouts - Mike Saladen

Most of the spills which have taken place, with the exception of Fenton Hill and the TA-15 Connector Road, are ready for closeout. A DOE/OB person is needed to walk the spill sites before the closeout can occur. Mat Johansen, DOE/LAAO, should write a letter to Steve Yanicak, DOE/OB, and request that a DOE/OB person be assigned to spill inspection.

7. Prioritizing 684 Sites and Status of AP-4.5 - Steve Veenis, Mike Alexander

Dave McInroy said that sites that have received NFA and sites that were created by subsurface discharges are lower priority than sites in water courses that have surface disposal problems. Hoditschek asked if SWQB could participate in the prioritization. Hoditschek and Kim Hill, HRMB, asked if comments on the form could still be generated. John Rogers, GWQB, asked about the bench and slope information to be provided on the form. Hoditschek recommended going to the field and testing the form. Plans for the following week were made to do this with Mike Alexander and Steve Veenis. Dave McInroy, LANL, mentioned that the FIMAD database is still being restructured for queries. Hoditschek asked if queries on the bioaccumulators could be performed. McInroy indicated that this is not currently possible, but work is still proceeding in this direction. Hoditschek presented McInroy with a list of bioaccumulators that should go into a query once the query capability is constructed. McInroy said he would follow up with a status report.

Action Items: NMED will expedite delivery of comments on the AP-4.5 form and participate in field trials of the form. McInroy will provide an update on the FIMAD query for bioaccumulators in a future monthly meeting.

8. Discussion of LANL Response to NMED Letter of February 5, 1997

On item 1 of the response, Hoditschek mentioned that although the maps are difficult to read, she does not want a request for a different scale to cause expensive results. McInroy mentioned that each FIMAD map submitted cost about \$800. Michael Dale, DOE/OB, said that DOE/OB will have the capability to generate the maps that Hoditschek is requesting. Hoditschek said she could work with the DOE/OB White Rock Office to generate maps of different scales. On item 2a, Steve Veenis said he could add the SRS score to his database. On item 2b, an updated list was given to Hoditschek. Field unit personnel scrubbed the original list for errors and required additions. On item 2c, validation, Hoditschek mentioned that validation refers to whether a site should be on the list of sites in a watercourse. Hoditschek asked which sites were dropped from the list and for an explanation of why they were dropped. Steve Veenis said that he would provide this information. On data, Veenis asked if NMED wanted information for constituents that exceed SAL. NMED replied that exceedence of SAL is not adequate because of the problem with bioaccumulators; UTL must be taken into consideration. Kim Hill said she does not believe the SRS needs to be revised; modifying factors for surface water concerns should be designed instead. The RFI Report framework was mentioned by NMED. Bonnie Koch, DOE/LAAO, said that all future reports will have a section on water quality issues. McInroy is generating a list that will show due

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dates for RFI Reports covering the 684 sites in watercourses. This list will come later to Hoditschek in a letter; dates are still being negotiated with HRMB.

Action Items: Steve Veenis will add SRS scores to his database on sites in a watercourse. He will also provide Hoditschek with a list of the sites which dropped from the main list of sites in a watercourse with an explanation of why they were dropped. McInroy will prepare a letter for Hoditschek which includes RFI Report due dates for the sites in a watercourse.

9. Discussion of Ed Kelly Letter, April 28, 1997 - Dave McInroy, Bonnie Koch, Steve Rae
Bonnie Koch explained that data is a problem because of the complex FIMAD system. Although it is difficult to grasp, until RFI Reports are in the stages of preparation, data are not readily available because of the difficult data queries that are required in reading all the data out of the system. To compensate for this, the ER Project offers AP-4.5 and a section in the RFI Reports to highlight data for water quality issues. The forms for AP-4.5 will be given to NMED to also aid in the problem with data accessibility. Ralph Ford-Schmidt, DOE/OB, said he needs to know as soon as possible when a 1203 exceedence has occurred to assure BMPs are put in place. On the issue of the regulator's request for all groundwater and surface water data, Michael Dale reported that the Los Alamos Pueblo Canyon Work Plan collects most of the information for those two locations.