



Department of Energy

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

JUL 22 1997

Dr. Ed Kelley, Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

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: Notes for Monthly Meeting with Water Quality Bureaus

Enclosed is a copy of the notes recorded by the Department of Energy (DOE) and Los Alamos National Laboratory (LANL) staff for the monthly meeting with the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) and Ground Water Quality Bureau (GWQB) which took place on June 11, 1997. The meeting also included staff members from NMED Hazardous and Radioactive Materials Bureau (HRMB) and the DOE Oversight Bureau (OB). The meeting covered water quality related topics for operations at LANL, as well as the Environmental Restoration (ER) Project.

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 scheduled for August 20, 1:30 p.m., at your offices in Santa Fe. LANL looks forward to meeting with you then, and will provide a draft agenda for your review by August 13, 1997.

Sincerely,

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

LAAMEP:9BK-023

Enclosure

cc:
See page 2



13063

ASWA LANL G/M/N/97

TU

Addressees

2

JUL 22 1997

Stu

*Teri John
FJT
gh*

cc w/enclosure:

Glenn Saums

Surface Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

Barbara Hoditschek

Surface Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

Benito Garcia, Bureau Chief

Hazardous and Radioactive Materials
Bureau

New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

Steve Yanicek, AIP, NMED, LANL, MS-J993

Ralph Ford-Schmid, DOE Oversight Bureau

New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

M. Jackson, DOE/KAO

J. Vozella, AAMEP, LAAO

T. Taylor, LAAMEP, LAAO

B. Koch, LAAMEP, LAAO

J. Mose, LAAMEP, LAAO

T. Baca, EM-DO, LANL, MS-J591

J. Jansen, EM/ER, LANL, MS-M992

D. McInroy, EM/ER, LANL, MS-M992

D. Erickson, ESH-DO, LANL, MS-K491

S. Rae, ESH-18, LANL, MS-K497

M. Saladen, ESH-18, LANL, MS-K497

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 NMED SWQB/GWQB
June 11, 1997

1. Watershed Management:

Charlie Nylander with LANL ESH-18 gave a presentation on LANL's current status in developing a Watershed Management Plan. Some elements of the LANL approach document were also discussed. Topics covered included the following: specific analytes for monitoring; the DQO process and schedule; the Centralized Data Base Subgroup and the use of FIMAD in the document preparation and implementation; crosswalks to other plans such as the Natural Resources Management Plan; drainage mapping; and use of the Watershed Management approach as a planning tool. A draft of LANL's "Surface Water Protection and Management Strategy" will be provided to NMED. The document should be available soon and NMED comments are invited.

Questions were addressed pursuant to the presentation. Ralph Ford-Schmid, NMED OB, asked if LANL would be coordinating with the County in the evaluation of urban runoff. Nylander replied that this effort would be undertaken. Ford-Schmid also asked about the progress in the DQO process and Nylander replied that most of the effort would be completed by the end of July. Ford-Schmid inquired as to whether individual plans for each watershed were being entertained and Nylander answered that each canyon will undergo the DQO process separately because characteristics such as types of contaminants do vary between the major drainages. Teri Davis, NMED HRMB, requested a copy of the large display map used in the presentation and Nylander took this action item. Kim Hill, NMED HRMB, asked about coordination with Canyons and Nylander explained that various members of the Canyons ER team are members of the Watershed Planning teams. Michael Dale, NMED OB, mentioned that the draft document "Spring Snowmelt Runoff," 1994, has information in it relevant to watersheds. Mike Saladen, ESH-18, took the action item to provide Dale a copy of the document. Nylander said that the Management Plan will target perennial, intermittent and also wetland areas. Ford-Schmid asked what would be done if sampling under the Watershed Plan showing a WQCC value is exceeded. Nylander replied that sampling upstream to determine the source would be subsequently initiated; once source is determined, Best Management Practices (BMP) would be installed as a first step in addressing the source. Sampling stations can, in turn, be used to verify if BMPs are effective in controlling source.

Questions continued: Ford-Schmid asked when monitoring would begin and if funding is available. Nylander answered that some monitoring is already underway through the environmental surveillance program. A budget request for stations that must be installed in addition to these has already been submitted. Sampling will begin next fiscal year. Monitoring criteria for each individual station will be selected before initiating the sampling. Appropriate sampling methods will be reviewed through the DQO process. Teri Davis asked

what LANL uses for SALs in water. Longmire replied that WQCC standards are currently used. Also, Veenis replied that the ER Decision Support Council is looking at developing "water SALs." Barbara Hoditschek, NMED SWQB, asked whether the Regulatory Standards Subgroup of the Watershed Planning Team would be preparing a comprehensive list of all applicable regulations. Nylander indicated that such a list would be prepared as a matrix and would be part of the management document. Saums commented that the point of compliance for WQCC standards are at any location in a watercourse where a sample is taken and not simply at the boundary of a facility. Nylander explained that the sampling stations are monitoring locations and not specifically identified as points of compliance.

Action Item: Nylander will send a copy of LANL's draft "Surface Water Protection and Management Strategy" to NMED when it is completed. Nylander will provide a copy of the large-scale display map used for the Watershed Management presentation to Teri Davis of NMED HRMB. Mike Saladen will provide Michael Dale with a copy of "Spring Snowmelt Runoff" by Advanced Aquatics.

2. Background Water Chemistry:

Pat Longmire, representing the ER Project Earth Sciences and Decision Support Council, gave a briefing on the status of the development of background water chemistry for surface waters and groundwater at LANL. Topics covered during the portion of the briefing pertaining to groundwater included: a review of geologic formations having the occurrence of groundwater; relevant regulations in evaluating background; currently existing background wells and springs for the various occurrences of groundwater; the technical approach for developing background including lists of constituents to be evaluated; and use of existing data, including stable isotopes and trace elements, to determine sources of water and flow paths. Topics covered during the surface water portion included: locations for background samples and the limit of the study scope; integration of flow rates with water chemistry; PAHs and PCBs added to the same list of analytes developed for the groundwater portion of the study; use of charge balance in evaluating quality of sample results; expected contrasts between existing data and newly generated data; and methods and formats for presenting and analyzing data. Glenn Saums expressed a concern that efforts to study the background are not too concentrated.

3. Release Notification Letter:

Alex Puglisi stated that LANL had not completed its response to Ed Kelley's letter regarding release notification issues so LANL was not prepared to discuss this issue in any detail. However, LANL wanted to discuss separation of the release notification issues involving operational facilities and those involving ER sites. Many of the questions surrounding LANL's release reporting involve releases caused by ER sites and not those releases resulting from "operations" at LANL. LANL has typically reported those releases as a matter of course in the past. Mike Saladen of ESH-18 requested that operational notifications be

separated from ER notifications. Operational spills would continue to be reported on the LANL form which has been recently modified to address comments from the SWQB. Hoditschek indicated that this proposal would be acceptable if the operational forms would make note of spills which cross PRSs. Hoditschek also wanted to know how the ER sites would be handled when separated from the operational spills, warning that if NMED's release notification requirements were not properly addressed by LANL in regard to ER sites, NMED was prepared to write notices of violation.

Koch stated that any response to this question must consider the general situation for the data that exists for the ER Project. As a result of this situation, data is essentially not accessible until the preparation of RFI Reports. Because of this situation, Koch proposed that AP-4.5 be used to address the notification requirements in the May 1, 1997 letter from Ed Kelley. The AP-4.5 forms have recently been modified, in cooperation with NMED, to include a ranking matrix. Sites with a high priority ranking on the matrix can be faxed to NMED SWQB. This bureau can then evaluate the information to determine if a 1203 is required. All the AP-4.5 forms can also be provided to Ralph Ford-Schmid of NMED OB on a monthly basis so that NMED would have the opportunity to review the AP-4.5 information generated for all sites.

Hoditschek indicated that use of AP-4.5, as described above, would be a reasonable approach if the following three conditions could be met by the ER Project:

Condition 1: At the monthly meetings, NMED and LANL will review the list of 684 sites for any newly identified sites which need to be added to the list. In addition, LANL must update NMED monthly on sites for which the AP-4.5 form has been completed so that NMED can track LANL's overall progress, and also see if NMED priorities are being addressed in a reasonable sequence. Steve Veenis will prepare this material and also work jointly with Hoditschek who may, independent of LANL, identify units that are in a watercourse. Hoditschek acknowledged that this list should be focused on first; ER sites on mesa tops would come later.

Condition 2: LANL has to prepare a schedule which shows how the use of AP-4.5 will be completed by Dec. 31, 1997. Hoditschek will look at the schedule and may ask for changes on which sites are addressed first.

Condition 3: As a result of the matrix ranking on the AP-4.5 form, work with NMED to ensure that "high priority sites" (sites above a certain limit on the AP-4.5 matrix) are addressed within appropriate time schedules by the ER project. A key element to this condition would be HRMB's cooperation in integrating SWQB priorities into the ER baseline.

In addition to the above three conditions, Hoditschek said that whenever a site falls into the high priority ranking of the matrix, BMPs must be installed immediately. Verification of the

installation must take place within 15 days via a modification of the AP-4.5 form. Sites requiring BMPs, which are not high priority via the AP-4.5 matrix, must also be reported on a monthly basis. Steve Veenis will take the action item of reviewing all BMPs installed during a given month at the appropriate monthly meeting. As a closing comment to this section, Hoditschek said that the DOE/LANL response to Ed Kelley's letter of April 28, 1997 did not show the level of management commitment to SWQB priorities that NMED was hoping to see. Hoditschek said that Condition 3 (see above), ER Project commitment to changing their baseline to address SWQB/GWQB priorities, was more along the lines of what NMED would like to see.

Action Item: Steve Veenis/Mike Alexander to provide a schedule for the completion of the use of AP-4.5 by Dec. 31, 1997. Steve Veenis also to report at the next monthly meeting on the status of the list of sites in a watercourse (sites added or sites removed) and review the number of forms completed for AP-4.5 (data for Condition 1 above).

4. AP-4.5 Update:

This portion of the agenda is deferred to the next monthly meeting. At this time Steve Veenis will cover the number of sites for which the form has been completed and BMPs installed (this action item noted above).

5. NOIs for ER Sites:

Alex Puglisi presented the Sandia National Laboratory's decision logic diagram, outlining the decision logic which would be used by SNL to determine whether an NOI or release report should be submitted to NMED. This was presented by SNL in a letter sent to Jim Piatt and Marcy Leavitt on January 20, 1995, and was apparently agreed upon by both parties at earlier meetings. This was confirmed by Marcy Leavitt at a meeting she attended in May. She stated that LANL would like to utilize a similar procedure to guide the process of submitting NOIs for investigation derived waste at ER sites. It reflects the logic behind the "General NOI" concept that LANL has been using for years in regard to potable water discharges and other discharges which posed little or no threat to either surface or ground water. Saums said the flow chart would need to be modified because it is SWQB's position that all flows to a watercourse must still be reported to SWQB. Alex indicated that the intent of this process would be to avoid all discharges to surface water, thereby eliminating possible impacts to surface water. Additionally, staff of the Ground Water Protection and Remediation Bureau (GWPRB) have also repeatedly stated that they are not concerned with these limited volume discharges that did not exceed the State's ground water standards. The decision logic assures that discharges would not exceed ground water standards and would be performed in a manner which would prevent any surface water discharges. For example, BMPs would be put into place to intercept surface flows or to contain and stabilize disturbed soils. Suspect materials at areas of contamination would be analyzed prior to discharge, and the volume of each discharge would be planned in a manner to promote rapid infiltration and minimal

surface migration. If NMED agreed to this decision logic, it might also be useful for addressing non-ER sites. Glenn said that he wanted to make it clear that whenever NOIs for ER Project decontamination water or well purge water were involved, HRMB would have to become part of the notification process. Hoditschek added that analyses of this water would have to be available before any NOI could be approved if there was any discharge to surface water. Steve Veenis said that the number of NOIs which ER must submit for purge water is fairly high. He indicated that this type of "generic NOI" could be negotiated to eliminate large volumes of paperwork for LANL and NMED.

Glenn Saums said he was concerned about this proposal because NOIs must be available for public review and he wasn't sure whether this process allowed for that. A generic NOI for which records are kept at the facility does not necessarily allow for public review, and this might be a problem. Alex Puglisi proposed that NMED's response to LANL's request for the generic NOI could be submitted into the public record and might be able to serve this purpose if NMED's approval required that all records associated with the NOI be available for inspection. This would somewhat mimic similar requirements for record availability that are written into NPDES and RCRA permits. NMED and Puglisi took the action item to consider ways to develop the generic NOI while keeping these concerns in mind. Puglisi and Veenis explained that BMPs are installed to accommodate the ER discharges. Hoditschek asked whether GWPRB is copied on the NOIs that ER submits to SWQB. Alex Puglisi and Mike Saladen confirmed that GWPRB has been routinely copied on NOIs in the past. Hoditschek said that HRMB should also be copied.

Action Item: NMED and Puglisi took the action item to consider ways to develop the generic NOI while also keeping the public informed. Puglisi and Veenis also have the action item to provide a list of possible types of ER discharges that might be covered under the proposed decision logic process, and Puglisi is to modify the Sandia flow chart according to the comments presented by Saums. Puglisi also has the action item to provide a copy of the ER Project PCT Policy on IDW to SWQB.

Next Meeting: July 16, at 8:30 a.m. in Santa Fe. Hoditschek will notify LANL later of the location in Santa Fe where the meeting will take place.

Note: NMED considers these meeting notes only, and that no binding decisions have been made and documented in this material.