

2.0 DISCUSSION

2.1 Kickoff Meeting for DQO Process for Storm Water MSGP Monitoring

Steve Veenis described the purpose of this effort is to develop consensus on the Los Alamos National Laboratory storm water monitoring program. A Data Quality Objective (DQO) process will be used to ensure the monitoring data will be adequate for compliance with the Multi-Sector General Permit (MSGP). This effort is expected to:

- Improve communication
- Get regulator input into the storm water monitoring plan
- Verify that the assignment of industrial activities into the MSGP sectors has been appropriately done
- Determine appropriateness of contaminants of potential concern for SWMUs

This effort is not intended to:

- Develop an overall watershed management plan. Storm water monitoring for compliance with the MSGP is a component of the larger watershed management plan, which is under development.
- Create a mandate for corrective actions, except for what is required in the MSGP.
- Compile a list of all potential contaminants at every gaging station. This is focused on monitoring for the MSGP, which defines the benchmarks. Other potential contaminants are included in the current surveillance program.

2.2 Highlights from the meeting discussion:

The participants representing the NMED Surface Water Quality Bureau, Hazardous Materials Bureau, and DOE Oversight Bureau expressed the following concerns about the approach. These concerns will be addressed in the DQO process in subsequent meetings:

- LANL should have one comprehensive surface-water management program. Focusing only on the MSGP requirements is a piece-meal approach that is inefficient in terms of resources (having to participate in more meetings) and may not result in an optimal surface-water management program.
- The watershed approach to monitoring is not a substitute for site-specific monitoring. Watershed monitoring allows for dilution and does not provide information of the quality of water discharged from SWMUs prior to discharging to waters of the US. While there is no expectation that every

SWMU will have surface water monitoring, there should be a combination of site-specific and watershed monitoring.

- Benchmark parameters in the MSGP do not cover all of the contaminants that may be present, so the benchmark list should be made more comprehensive.
- Discharge monitoring reports should include all parameters detected, not just the MSGP benchmark list.
- The RCRA permit may require surface water monitoring, so inclusion of RCRA constituents now would save having to re-do this process when the permit is issued.

The DQO process is intended to plan data collection and analysis to be able to resolve a specific decision. The DQO process results: location of sampling, sampling methods, analytical methods, etc. can not be established outside of the context of the decision to be resolved.

The MSGP is in the second year, and monitoring is required this year. In order to complete this DQO effort in time to implement the consensus monitoring plan, it would be best if:

- Meet weekly for a period of 2 months
- Continued involvement of regulatory staff

The Surface Water Quality Bureau has not agreed to have a staff member participate in this effort. The Hazardous Waste Bureau will most likely not continue to be involved. The DOE Oversight Bureau will consult with the other bureaus about the Oversight Bureau representing their perspective.

The next meeting is tentatively scheduled for January 23, 9:00, at the ESH-18 Conference Room at TA-59.

Any exceptions taken to these minutes should be brought to the attention of the Steve Veenis (667-0013), within five (5) working days of receipt.

SV/tml

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