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Los Alamos
NATIONAL LABORATORY
memorandum

*Risk Reduction & Environmental Stewardship Division
Water Quality & Hydrology Group
(RRES-WQH)*

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General

SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR APRIL 16, 2002

1.0 PURPOSE

The Surface Water Site Assessment Team (SWAT) recently began a new effort to review the Laboratory's Storm Water Monitoring Program for the Multi-Sector General Permit. A Data Quality Objective (DQO) process will be used to determine the adequacy of the data collected by the Laboratory's monitoring network. The SWAT role is to provide a review of Industrial Activities, SWMUs, station locations, analytical methods, Benchmark Parameters and approved monitoring waivers and to make recommendations on how to improve the overall approach.

A meeting with NMED, EPA, and LANL representatives was held in January 2002 in Santa Fe, NM. NMED and EPA indicated that they felt the watershed approach to NPDES storm water compliance monitoring for SWMUs is not compliant with the Multi-Sector General Permit. The Laboratory's Water Quality and Hydrology Group (WQH) and Legal Council Group does not agree and has recommended the DQO review. Some options that are being considered for storm water monitoring of SWMUs are:

- Monitoring under the LANL RCRA program. This would be more protective because a broader suite of analytes would be applicable. However, there is an analytical issue regarding use of SW-846 or 40 CFR 136 methods.
- Monitoring SWMUs using the "substantially identical outfall" provision where a smaller subset of SWMUs are monitored, but BMPs would be required on all SWMUs that were substantially identical to the monitored SWMU(s)
- Obtaining an individual NPDES storm water permit.
- Getting concurrence on the Laboratory's existing watershed approach.



2.0 DISCUSSION

2.1 Corrective Action Order Anticipated

It is anticipated that a corrective action order (CAO) will be issued to LANL in the first week of May 2002. The current RCRA permit requires no migration of contaminants from SWMUs and clean up of releases from SWMUs. According to NMED/HWB personnel, surface water monitoring requirements in the CAO will take a combined watershed and site-specific approach, by requiring monitoring in canyons downstream from SWMUs and monitoring of specific prioritized SWMUs on a rotating basis. The purpose of the monitoring is to identify migration of contaminants from SWMUs and to evaluate BMP effectiveness. The monitoring will require sample collection and analysis for a comprehensive analytical suite. A surface water monitoring plan is required, but the CAO will not include specifics on the content or format of the plan.

2.2 RCRA and CWA Monitoring Considerations

- 1990 Federal Register (v. 55, #222, p. 48012) addresses the overlap of RCRA corrective action and NPDES storm water. It states that until the corrective action process has been completed, monitoring of storm water from SWMUs under the NPDES program should be continued. It acknowledges the overlap of the two programs and encourages using both programs in a coordinated fashion to achieve environmental protection. It is not known if this is the current approach supported by the EPA.
- Analytical methods. The MSGP requires analysis of storm water using 40 CFR 136 methods. RCRA requires analysis of samples using SW-846 methods. LANL believes it is unreasonable and not cost effective to analyze samples two times with different analytical methods.
- The concept of watershed-based monitoring with site-specific monitoring at prioritized SWMUs as a basis for NPDES storm water compliance monitoring for SWMUs does not have the support of the NMED/SWQB, at this time.
- There is support from NMED/HWB and NMED/SWQB that the NPDES storm water compliance monitoring for SWMUs can focus on SWMUs that have medium and high (>40) erosion scores. However, the inventory of contaminants known to exist at the SWMU should also be considered.
- The Rocky Flats Memorandum Of Understanding (MOU) could be considered as a way to set up the storm water monitoring, although it is a different EPA region, and they are quite autonomous.
- Definition of "representative" sample from SWMU is critical in developing the compliance monitoring approach.

These considerations will continue to be addressed by the SWAT during the DQO process. When an issue is resolved, the meeting minutes will reflect any decision that is made.

2.3 Treatment, Storage, Disposal Facilities (TSDF)

TA-55 Plutonium Facility

Proposal: Use existing sampling station (E196) and add another station to be located based on field inspection.

Rationale: Most of the activities at this facility take place indoors, but there are loading docks, access roads, and some outdoor storage pads. The drainage area for E196 encompasses most of the west and southwest sides of the building, where the nitric acid tank and several loading docks are located. The storm water from the east and northeast sides of the facility is not being monitored at this time.

Questions:

- Inspect the location of the new sampling station that is proposed for installation.
- Confirm the location of exposed and non-exposed materials (needed to develop the “no exposure certification”).
- Confirm the location of outdoor storage pads.

Resolution:

A field visit was conducted at TA-55, on April 30 by SWAT members. The proposed sampling location (E198) was inspected and was determined to be sufficient. It is located in the northeastern corner of the facility near 54-43 and will collect runoff from the outdoor storage pads.

All regulated areas located within Basement Areas 1-7 and buildings 55-4, 55-8, 55-9, 55-10 and 55-185 are indoors. A non-exposure certification will be completed for these areas.

TA-16 Burning Grounds

Proposal: Use existing sampling station (E257).

Rationale: Storm water from the entire site is flows to a single channel where station E257 is located. Since the storm water runoff from the entire drainage basin is captured, the existing station location is appropriate.

Questions:

- Verify location of NPDES Outfall for HEWTF in relationship to the storm water gaging station.

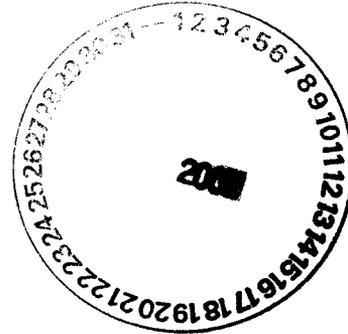
Resolution:

The HEWTF outfall is located upstream and within the same drainage as E257. The Watershed Integration Team (WIT) will include barium and HE in the analytical suites to be addressed at this station to accommodate this potential source.

The next meeting is scheduled for Tuesday, April 30, 9:00, at LANL in the Pueblo Complex Conference Room when we will continue the discussion of Treatment, Storage and Disposal Facilities.

Participants:

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