

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

General

TO: SWAT Team Members
FROM: Steve Veenis/ RRES-WQH
SYMBOL: WQ&H:
SUBJECT: **DRAFT SURFACE WATER ASSESSMENT TEAM MEETING
MINUTES FOR MAY 8, 2002**

DATE: June 3, 2002
MAIL STOP/TELEPHONE: K497/7-0013

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.

2.0 DISCUSSION

2.1 Storm Water Monitoring Plan

A copy of the draft Storm Water Monitoring Plan was provided to NMED. It had been sent to EPA and NMED/SWQB in October 2001. It describes the pre-sampling activities, permit, work authorization, filed implementation, maintenance, QA, and records. The maps are not up-to-date because more stations have been added (there are 80+ now). The list of stations also needs to be updated. The approach is to revise the entire plan after this DQO process has been completed.

2.2 Representative Samples

The following statement is the official definition for "representative sample".

"Storm samples are collected from a representative sampling location when one collects storm water runoff from the majority of the exposed industrial activity and minimizes the storm water collected from areas up slope of the industrial activity. All samples will be collected in accordance with the procedures set forth in the **approved** Storm Water Monitoring Plan developed by RRES-WQH."



13643

2.3 Corrective Action Order

DOE and LANL are currently reviewing the Corrective Action Order presented to the Laboratory on May 2, 2002. One question that the Corrective Action Order raises is under who/what authority is monitoring storm water runoff from SWMUs – RCRA or Clean Water Act? DOE/OLASO sent a summary to DOE/HQ in preparation for asking for additional funding. However, neither DOE or LANL wants to have duplicative monitoring requirements (RCRA and Clean Water Act) for SWMUs. DOE/LANL's comments on the Corrective Action Order will include a proposal to monitor under one program or another, but not both.

In the view of the NMED/HWB, monitoring of runoff from SWMUs is required under RCRA. It is recognized that not every SWMU can be monitored, so the Corrective Action Order has rotating monitoring requirements. The objective of the monitoring is to detect releases from SWMUs and to check on the efficacy of the BMPs. The Corrective Action Order also requires stabilization plans for SWMUs. The Corrective Action Order was not intended to replace Clean Water Act requirements, just the monitoring of SWMUs. The Corrective Action Order left open the question of analytical methods.

The 1990 Federal Register (v. 55, #222, p. 48012) suggests that double-regulation of SWMUs is encouraged by EPA. The SWAT will continue to investigate this issue and recommend an approach that is supported by all Team members.

2.4 Treatment, Storage, Disposal Facilities (TSDF)

TA-16 MDA P

Proposal: Save this site for consideration at a future meeting.

Rationale: The TSDF at this site has been removed, thus the site consists largely of SWMUs.

TA-54 Area L

Proposal: Propose for no exposure certification if confirmed on the field visit. Use existing sampling station (E223).

Rationale: Storm water from the entire site sloped toward the sampling stations and storm water flows to the existing station E223. Thus, storm water runoff from entire site is captured by the existing station. However, the site is entirely asphalt-covered, activities are all conducted within buildings, and the buildings are bermed so water cannot flow in. This site may be a candidate for no exposure certification.

Questions:

- Confirm drainage from the area of the shafts is to station E223.
- Confirm that this site is a candidate for no exposure certification.

Resolution:

Depending on field trip results.

TA-50 Radioactive Liquid Waste Treatment Facility

Proposal: Propose for no exposure certification if confirmed on the field visit.
Otherwise, install 2 new stations:

1. for TSDs 50-0069 and 50-0037 near the road where the former Controlled Air Incinerator monitoring station was located.
2. for TSDs 50-0001 and 50-0114 install a new station south of the Tank Farm and east of the fence.

Rationale: There are four covered TSDs in this area (50-0069, 50-0037, 50-0001, and 50-0114). There are two existing monitoring stations: E201.1 captures runoff from MDA-C and E201.3 captures storm water runoff from an empty area to the east of MDA-C. Neither of the existing stations appear to capture storm water runoff from the TSDFs. However, since the TSDFs are closed buildings, this site may be a candidate for no exposure certification.

Questions:

- Check the Environmental Surveillance Reports for what constituents may have been released from the stacks in TA-50.
- Confirm that this site is a candidate for no exposure certification.
- Verify where surface drainage from regulated areas discharge from site.

Resolution:

Depending on field trip results.

Participants:

Brett Lucas
Barbara Hoditschek
Mike Saladen
Ralph Ford-Schmid
John Young
Gene Turner
Kelly Bitner

SV/tml

Cy: Ralph Ford-Schmid, DOE/OB, Santa Fe, NM,
Barbara Hoditschek, DOE/OB, Santa Fe, NM
Richard Powell, NMED/SWQB, Santa Fe, NM
Brett Lucas, NMED/SWQB, Santa Fe, NM
Gene Turner, DOE/OLASO, MS A316
Dave McInroy, RRES/ER, MS M992
Mike Alexander, RRES/WQH, MS K497
Deb Woitte, LANL/LC, MS A187
Doug Stavert, RRES/DO, MS J978
Mike Saladen, RRES/WQH, MS K497
Ken Mullen, RRES/WQH, MS K497
Tony Grieggs, RRES/SWRC, MS K490
Karen Agogino, DOE/ALBQ, MS J514
Kelly Bitner, Neptune & Company, MS M969
James Bearzi, NMED/HWB, Santa Fe, NM
Jim Davis, NMED/SWQB, Santa Fe, NM
John Young, NMED/HWB, Santa Fe, NM
Steve Rae, RRES/WQH, MS K497
Everett Spencer, EPA Region VI, Dallas, Texas
WQ&H File, MS K497