

General: "SWAT"

John

Los Alamos  
NATIONAL LABORATORY  
memorandum

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

To/MS: SWAT Team Members  
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**SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR  
MAY 8, 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.

**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."



### 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 nor 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 the authority of 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 a stabilization plan 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 runoff from the entire site is sloped toward one discharge point, existing sampling station E223. 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:**

The shafts are located subsurface and therefore no storm water impacts are expected. Several of the TSDFs located within TA-54 Area L will qualify for the no exposure certification. When the applications are completed the SWAT will have a chance to review prior to submittal to EPA.

TA-50 Radioactive Liquid Waste Treatment Facility

**Proposal:** Propose for no exposure certification if confirmed on the field visit. Otherwise, confirm that two stations recently installed capture runoff for regulated facilities: There are four covered TSDFs in this area (50-0069, 50-0037, 50-0001, and 50-0114).

**Rationale:** The TSDFs at TA-50 are all covered by a SWPPP and the work conducted at these facilities occurs inside for the most part. There may be some activities that are conducted outside that may be exposed to storm water.

**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:**

There are two existing monitoring stations: E201.1 captures runoff from northern portion of TA-50 including 50-0069 and the northeastern part of 50-0001 and 50-0114; E201.3 captures storm water runoff from the southern portion of TA-50 including 50-0037 and most of MDA-C. However, since the TSDFs are closed buildings, this site may be a candidate for no exposure certification.

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