

John

General: "SWAT"

Los Alamos
 NATIONAL LABORATORY
memorandum

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

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 Date: June 27, 2002*

**SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR
 MAY 29, 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 May 2, 2002 Draft Order

The Draft Order calls out gaging stations for monitoring that are used specifically for NPDES Storm Water compliance monitoring. These stations will remain dedicated to the MSGP, but will provide support to meeting the intent of the Draft Order through the Watershed Management Program.

Single stage samplers could be useful in providing additional support related to the Draft Order. For example, if you get a "hit" at E274 in Ancho Canyon, that will require going back up canyon to see where it is coming from. Single stage samplers could provide more site-specific information. Second example, the Draft Order requires stabilization. Stabilization could be demonstrated with single stage samplers.

John Young participated in two previous SWAT meetings and discussed the Draft Order and the requirements for watershed-based and SWMU-specific based monitoring on a rotating watershed basis. However, this is not in the Draft Order. Instead, the requirement is to collect and analyze samples from the list of 60 stations every time it rains and in conjunction with groundwater monitoring. Further, there are no stopping criteria. The concept of monitoring for a specific time to see if anything is coming off a site and stopping monitoring if nothing is seen is not in the Draft Order.



2.2 Approach to Satisfying SWMU Monitoring Requirements Under RCRA

As discussed by the SWAT many times, the preferred approach is to monitor runoff from SWMUs under the LANL RCRA program, rather than under the NPDES storm water compliance monitoring. The group discussed how to move forward in implementing this approach. The points made were:

- If LANL and NMED agreed to this approach, EPA would likely go along with it. It is not known whether both HWB and SWQB would support this approach.
- The legal opinion of the applicability of NPDES requirements to SWMUs should be developed and finalized.
- Such a proposal would have to demonstrate compliance with the Draft Order
- Discharge Monitoring Reports (DMRs) will be submitted only for MSGP benchmarks for the specific industrial activities, but access to all other analytical data will be available via RRES-WQH web page. Screening tools are provided to simplify data searches.

2.3 Visual Monitoring

To meet the visual monitoring requirements of the MSGP the Laboratory has developed an inspection form to be completed by field sampling crews when they go out to retrieve the bottles from the ISCO samplers. In the near future, the Laboratory would like to get facility personnel to complete the inspections during actual rain events. A guidance document will be developed to help facility personnel implement the new approach.

The SWAT supported this approach but would also like to include some type of documentation on what will be done in response to seeing something; i.e., if a sheen is noted, then what action will be completed. The form should include some trigger for action. Since the monitoring station locations have been selected by the SWAT to be representative of the industrial activities, there was general agreement that when implemented, this would meet the visual monitoring requirements. Ralph Ford-Schmid and Barbara Hoditschek requested copies of the guidance and the form.

2.4 Treatment, Storage, Disposal Facilities (TSDF)

TA-16 MDA-P

Proposal: Propose site for “no exposure certification” if all clean closure requirements have been addressed.

Rationale: MDA-P has undergone clean closure by removal of all overburden, down to tuff. The closure plan is being written.

Questions:

- Verify what the post-closure monitoring requirements will be. If monitoring is required to demonstrate clean closure, then install a new monitoring station in the drainage on the east side of MDA P.

Resolution: Fieldwork at MDA-P is complete. Weston has done some interim stabilization on the upper slopes and IT is conducting the BMP inspections and maintenance. There are no surface water monitoring commitments and since this is a Clean Closure there will be NO long-term monitoring requirements. The Final Report will be submitted in January. Final stabilization and revegetation is in the FY04 Baseline.

TA-54 MDA-J

Proposal: Propose site for “no exposure certification”

Rationale: Area J was a landfill used for non-hazardous and non-radioactive containerized waste. It is currently undergoing closure. Existing monitoring station E221 captured runoff from the asbestos area of the landfill.

Questions:

- Check the analytical data from station E221 to see if there has been anything detected running off the landfill.

Resolution: A field trip was conducted at the site on June 12, 2002. The SWAT observed site stabilization activities including regrading, recontouring, hydromulching and site irrigation at the former MDA-J landfill. Two “temporary” gaging stations will be installed to monitor storm water runoff from the site until the final stabilization is achieved. The analytical data from these stations will be submitted on DMRs as is the current practice. Once the site is stabilized, a “no exposure certification” will be completed.

TA-54 MDA-H

Proposal: Propose site for “no exposure certification”

Rationale: Area H was a landfill used for classified waste. The waste was placed in shafts that are capped with concrete and there is a 3-foot thick soil cap over the entire landfill. It is currently undergoing closure. There is currently no storm water monitoring at MDA H and the closest monitoring station E250. The site had a SWAT score of 45.4.

Questions:

- Verify the current condition of MDA H by field visit. If soil cap is stable the site could then be proposed for “no exposure certification”.

Resolution: A field trip was conducted at the site on June 12, 2002. The SWAT determined that the site was stable and that a "no exposure certification" would be appropriate. A request has been made for a copy of the soil cap design proposed for implementation at the site.

Participants:

Gene Turner
Steve Veenis
Barbara Hoditschek
Kelly Bitner
Ken Mullen
Mike Saladen
Ralph Ford-Schmid



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