

General

 **Los Alamos**  
NATIONAL LABORATORY  
**memorandum**

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

To/MS: SWAT Team Members  
From/MS: Steve Veenis, RRES-WQH, MS K497 *SV*  
Phone/Fax: 7-0013/5-9344  
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**SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR  
SEPTEMBER 4, 2002**

## **1.0 PURPOSE**

The Surface Water Site Assessment Team (SWAT) continues an 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 Multi-Sector General Permit (MSGP) Sector K – which includes Solid Waste Management Units (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 Coverage of SWMUs under the Multi-Sector General Permit (NMR05A734)**

In past meetings the group had considered various approaches for addressing runoff from SWMUs. Issues had included whether it was allowable/preferable to cover SWMU runoff under the RCRA Corrective Action process, whether SWMUs met the definition of industrial activity under the MSGP, and whether a watershed-based monitoring approach would be acceptable for SWMUs.

At this meeting, NMED expressed an opinion that SWMUs need to be addressed under the MSGP, and that they need to be addressed on SWMU-by-SWMU basis (not watershed). From the perspective of the NMED, storm water runoff is a point source by definition, and even a rill emanating from an industrial facility is considered an outfall. Furthermore, SWMUs are to be considered industrial activities unless they have been designated for No Further Action under the HSWA Module. LANL disagreed that not all storm water runoff emanating from SWMUs should be considered "point source" discharges.

The Clean Water Act definition of "point source" was reviewed by the team; "any discernible, confined and discrete conveyance, such as a pipe, ditch, channel, tunnel, conduit, discrete fissure, or container." The key point of discussion was whether or not the definition point source was specific to man-made conveyances or not.



It was recognized that regardless of the definition of point source, active monitoring of each LANL SWMU would be an impossible resource drain, both for LANL and for NMED's inspectors. The consensus of the meeting was to establish as a first priority the approximately 250 SWMUs that have been identified as having high erosion potential (using SOP 2.01). This list can be focused further by:

1. using the "substantially identical outfall" provision (see below), or
2. eliminating SWMUs that have no potential for exposure.

The process of refining the list will begin at the group's next meeting.

It was recognized that this endpoint might not be optimal for environmental protection – for instance, because it would constrain the list of analytes to the MSGP benchmarks. However, the consensus was that this was the only endpoint consistent with MSGP regulations.

The consensus expressed in this meeting could change if LANL eventually moves from the MSGP to an individual permit. It could also change if the next iteration of the MSGP allows for a watershed-based approach (it was pointed out that the EPA Region 6 website emphasizes watersheds). In the meantime, it appears that LANL's watershed management program will proceed to support the Laboratory's Environmental Surveillance Program, Environmental Restoration needs and "good stewardship" goals.

## 2.2 Determination of Substantially Identical Outfalls

The group reviewed a draft list of inputs to a "substantially identical outfall" determination:

- Erosion matrix score components (SOP 2.01 Part B)
- Precipitation and runoff coefficient information
- Drainage area above and including SWMU boundary
- Existing structural BMPs at a site
- Transport characteristics of contaminants
- Identical storm water management practices (e.g., BMPs)
- All SWMUs identified within a consolidated unit
- SWMUs covered under the same SWPPP
- Similarity of Contaminants of Potential Concern (COPCs)

The next meeting is scheduled for Thursday, September 11<sup>th</sup> in Santa Fe at the Hazardous Waste Bureau offices. 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.

**Participants:**

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