LANL General 2003

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
Phone/Fax: 7-0013/5-9344
Symbol: RRES-WQH: 03-002
Date: January 7, 2003

SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR DECEMBER 18, 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 SWMU Runoff Management Issues

The meeting began with a general discussion of issues related to SWMU runoff management under the MSGP. Key points included the following:

- It will be important to engage the expertise and cooperation of LANL facility managers (FMs) for the program to be successful. This is especially applicable to the implementation of engineered solutions for controlling run-on onto SWMUs.

- Approval by LANL management and allocation of a sufficient budget will be key milestones for the plan. SWAT members discussed various approaches for promoting this endpoint.

- There are strengths and weaknesses to managing this program under the MSGP. Operating under a RCRA framework might have offered more flexibility, but that option appears to have been pre-empted by recent developments.

- ALL SWAT members agree that it is desirable to conduct a SWMU runoff management program that is meaningful, rather than one that merely meets the "letter of the law", especially because some of the MSGP requirements are a poor fit for LANL. Monitoring for SSC is an attempt to go beyond the minimum; however, the process for using SSC data to evaluate BMP performance still needs to be better defined. We are likely heading toward site-specific configurations, in which the optimal strategy varies from one SWMU aggregate to another. For instance, at one category of sites we may emphasize monitoring; at another category the approach may be to divert upstream run-on; and at a third category, the focus may be on trapping sediment at the toe of a hillslope drainage.

The next step is to develop a package describing the proposed process for managing SWMU runoff, including the identification of monitoring locations. SWAT meetings will be temporarily suspended while this package is prepared. In mid-February the SWAT will reconvene to review the draft proposal. Once the SWAT's review is completed, the package will be presented to LANL management for approval. Then a briefing of regulators (EPA and NMED/SWQB) will take place.

2.2 Representative Sampling Definition

The following definition of representative sampling was circulated for review:

> "Storm samples are collected from a representative sampling location when the sampling station(s) collect storm water runoff which represents 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 Storm Water Monitoring Plan developed by RRES-WQH (October 2001)."

The consensus was that this definition is acceptable.

2.3 Substantially Identical Outfalls

At an earlier meeting, the following list of inputs to the determination of substantially identical outfalls was drafted:

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

After further review at today's meeting, the decision was to eliminate factors 2, 5, 6, and 9, and to leave the remaining five factors in place.

2.4 NMED Final Order

The NMED Final Order (November 26,2002) does not specifically mention the Laboratory's MSGP for storm water discharges. However, the SWAT has been tasked with completing a DQO process to address monitoring storm water runoff below Solid Waste Management Units (SWMUs) that are covered by the MSGP. Since there is potential for overlap on issues concerning regulatory authority regarding certain SWMUs between the NMED and EPA, any recommendations that may come from this process may require reassessment at a future date.

This will be the last SWAT/DQO meeting until further notice. The effort and inputs of the SWAT over the past several months will be used to develop a comprehensive approach to monitoring storm water runoff from SWMUs required by the MSGP. Once the approach is completed, the SWAT will be asked to reconvene to help review and finalize. Any exceptions taken to these minutes should be brought to the attention of Steve Veenis (667-0013), within five (5) working days of receipt.

Participants:
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Kevin Hull
Ken Mullen
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