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memorandum

Environmental Stewardship Division (ENV-DO)
Water Quality & Hydrology Group (ENV-WQH)

To/MS: SWAT Team Members Distribution
From/MS: Steve Veenis, ENV-WQH, MS K497
Phone/Fax: 7-0013/5-9344

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NMED Hazardous Waste Bureau

SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR MAY 19, 2005

1.0 PURPOSE

The Surface Water Site Assessment Team (SWAT) consisting of staff members from LANL, DOE, DOE-OB and NMED is tasked with providing a review the Laboratory's Storm Water Management Program for the Federal Facilities Compliance Agreement (FFCA) Docket No. CWA-06-2005-1701 and newly issued Administrative Order (AO) Docket No. CWA-05-2005-1734. The SWAT role is to provide a review of storm water issues and to build consensus on recommendations associated with Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). Items of discussion will include but are not limited to; monitoring locations, potential pollutants, action levels, corrective actions, BMP effectiveness studies and permitting concerns.

2.0 DISCUSSION

General discussion: Steve Veenis (SV) handed out the draft agenda for review and comment (**Handout 1**). New team members were introduced: Greg Huey from NMED, Jean Dewart, LANL's ENV Division Program Manager for Pathway Evaluation and Protection and Deborah Apodaca Pesiri (DAP), a new Water Quality and Hydrology group member at LANL. Ralph Ford-Schmid (RFS) announced that Barbara Hoditschek (BH) and John Young of the Hazardous Waste Bureau would not be attending the meeting.

2.1 *Review of April 20, 2005 Draft Meeting Minutes*

The "*Draft Surface Water Assessment Team Meeting Minutes For April 20, 2005*" (**Handout 2**) was provided for review and comment. SV gave an overview of what has occurred in the last month at LANL. Comments on the meeting minutes included a discussion on BH's comments on the SWMU-AOC SWPPP. SV will finalize the April 20, 2005 meeting minutes and distribute to the SWAT.

2.2 *Storm Water Program Update*

Draft comments were received from BH on the Storm Water Monitoring Plan. SV asked if anyone at the State had additional comments on the monitoring plans. RFS stated that he had looked at the monitoring plan but did not have comments ready. Kevin Buckley (KB) and team has finished installing the 2005 SMA samplers except for the ones that will be used for demonstration during the June 7, 2005 site field visit and five other sites that will be discussed later in the meeting.

RFS inquired about sampling sites near firing sites. KB gave an overview of the sampling stations near firing sites. They included: Potrillo Canyon, Minie at TA-36, and TA-14. The TA-14 site is inactive. In addition, three samplers will be installed at TA-39 but the excavation permit is delayed. Single stage samplers may be required at TA-39.

RP requested that someone from LANL go through the previous FFCA volumes that NMED has received so that they are left with only the March 31, 2005 submittals. SV said that someone from LANL would go to their office and do this.

RFS commented on the Pueblo Canyon Willow Project. He asked if they could get a commitment from LANL to do the same thing in 2006. SV said this would be fine. If weather permits, RFS would like to start planting the willows in the winter next year.

2.3 Discuss NMED and DOE/OB comments to SWMU-AOC SWPPP

SV asked if any SWAT members had been able to review the FFCA submittals. No other team members have been able to review the documents. LANL has received draft comments from BH for the SWMU-AOC SWPPP **(Handout 3).** There was general discussion of BH's comments.

Regarding the definition for "final stabilization" on pages 3-6 of the document, and what would constitute "final stabilization." SV asked if we could refer to the Construction General Permit (CGP) definition for final stabilization. Rich Powell (RP) said the Construction General Permit definition for final stabilization is fine; it requires a 70% native vegetative cover, however there are other factors involved that must also be addressed. SV commented that maybe after 3 unchanged inspections the site could be called stable. RFS said that not only does the vegetation need to be stabilized but that the water quality should be evaluated as well. SV said LANL would come up with a definition for final stabilization and run it by everyone at the next meeting.

Regarding Appendix 5 and the Low Potential SWMUs that have erosion potential score < 40. BH recommended that scores less than 40 and those with no scores be checked. There was a discussion regarding this issue later in the meeting.

Regarding the site descriptions in Volumes 2A and 2B (Appendix 6) providing information on SWMUs that are part of consolidated/aggregate units. SV and Smith thought this had been done but they will check on this. SV stated that the erosion matrix scoring and site monitoring are not done for the consolidated units, but rather for the component sites. SV will speak further with BH.

Regarding Figure 2-1. The concern was which program (FFCA, MSGP, or CGP) is responsible for BMP inspections for FFCA sites. RP stated that there was not a consensus between EPA and NMED regarding this issue. RP indicated that he thought construction activities at a MSGP site should be covered by the MSGP. Currently, LANL addresses construction activities at FFCA sites under the CGP, per EPA guidance.

Regarding the availability of SWAT meeting information via a website. SV said there currently was not a website providing this information but one is planned pending classification review. RFS brought up that NMED still couldn't access the WQH web site due to a firewall problem at NMED. SV said that an Oracle Discovery account could be set up for them, and suggested that NMED contact Ken Mullen to have an account set up. SV brought up that the BMP data is not available to external users but it will be available through Discovery in the future. BMP GPS locations are currently not available.

Regarding Volumes 2A and 2B and the FFCA Monitoring Location Maps. The SWMU IDs are not on these, for example 2M-SMA-1. Smith responded by saying that only the sites with scores > 40 (i.e., the sites listed in the FFCA) are on these maps. KB said the site used in the example is an NFA site. RFS asked if all SWMUs were labeled in the maps. Smith said only those > 40.

SV asked if NMED would like to see sites < 40 covered under the Multi-Sector General Permit. All Sites should be considered for the Individual Permit according to RFS and RP. RP asked why these Sites with erosion scores < 40 were not included in the FFCA. SV said he thought that all sites should be covered under the permit, but the site pollutant information was only submitted for the 294 FFCA Sites. The erosion potential scoring system was originally used to prioritize the SWMUs of importance for BMPs. RFS stated that the < 40 criterion was arbitrary, and may need to be revisited. RP said that contamination levels should be taken into consideration.

SV proposed that the watershed gaging stations continue to be used to monitor the < 40 sites. RFS stated that the watershed-scale monitoring allows for dilution of potential contaminants, and the DOE-OB would like LANL to continue monitoring Sites on an individual basis although not necessarily for all Sites. RP suggested checking on the assessment scoring before making a judgment. Smith brought up that the highest scores are based on run-on and run off potential. Some are scoring in the low 20's simply due to topography setting. Maybe we could look at what contributes to these scores. For example, if there is no discharge from the site then the water quality is not impacted. RFS suggested maybe looking at the less than 40 sites and seeing if the scores (based on Run-on and Run Off) should be re-evaluated. RFS asked if LANL had a spreadsheet itemizing the scoring for each Site. SV said that the spreadsheet is currently going through classification review and would be provided as soon as this was completed.

SV said that some of the sites may qualify for the "No Exposure Certification." They are either under buildings, roads, parking lots, etc. LANL is working on is identifying such sites to see if they in fact do qualify for "No Exposure." RP brought up that the re-certification is required every five years. The sites that are inside buildings and underground should be straightforward to evaluate. SV asked if NMED would be more comfortable with LANL trying to get these sites to qualify for "No Exposure" versus erosion scores. This way the sites would still remain in the NPDES system. RP said that the SWQB would be more comfortable with this type of assessment, but when these sites are evaluated for "No Exposure" certification it will be a call of best professional judgment.

2.4 Discussion of Site-Specific monitoring Locations

KB gave a summary of the site-specific monitoring locations **(Handout 3, LA-UR 05-2064)**. For 2005, 35 new Site Specific Samplers sampling 77 Sites have been installed. Thirty-eight (38) Site Specific Samplers, sampling 81 sites, from 2004 have been reactivated bringing the total Site Specific Monitoring to 73 sampling locations for 156 Sites. There are 8 sampling sites that still need installation. Most of these are being saved for the field visit on June 7, 2005. There are 5 sampling locations that KB discussed and proposed to have them re-scored. He handed out maps and photos of the five sites (Handout 5).

Site 1 is ACID-SMA-1/Site 00-030 (g). This site is located near the aquatic center and is a septic tank under an asphalt parking lot. KB recommended re-scoring this site. RP and RFS both agreed that this site should be re-scored and that a certification of no exposure should be sought.

Site 2 is LA-SMA-5.3/Site C-41-004. The entire site is coved with buildings and pavement and is a series of storm drains. Currently the erosion score is greater than 40 due to its proximity to a water course. KB recommended having the sampling point in LA Canyon. RP and RFS both agreed that this site should be re-scored and that a certification of no exposure should be sought.

Site 3 is LA-SMA-5.5/Sites 02003 (a), 02-003(e), 02-006(b), 02-007, 02-008(a), 02-009 (b).
This site is the old OMEGA site and was a D&D project last year. It is flat with BMP's. The run-on and run off potential is zero. There is a berm between the site and stream. If a sampler is installed at this site it will have to be in LA Canyon. RFS said he didn't see a reason for this site to be monitored as long as the berm was not eroded or breached. He also recommended putting in a Jersey Barrier.

Site 4 is PT-SMA-3 is located near Potrillo Drive. The SWMU is sloping back into several buildings. Any run off that occurs will likely pond up within the site. KB is proposing to monitor at gaging station E266. RP said that he believe that there could be potential problems at the gaging station but if there is not any run off, sampling does not need to be conducted. RFS asked if there were any sites upstream. KB said he wasn't sure but there are not any between there and the gaging station. SV recommended adding this to the site visit list for June 7,

Site 5 is W-SMA-4 and is located near the Tritium facility. It surrounded by cliffs and is in an unsafe area to install a sampler. KB proposes to sample at gaging station E260. There are SWMU's between this site and E260 but they have single stage samplers. RFS asked if sampling could be done below the outfall or below the last SWMU's. KB said this may be possible but it is still unsafe is that area. He suggested adding this to the site visit on June 7, 2005.

In summary, it was decided that Sites 1 and 2 above would be taken off list and Site 3, LA-SMA-5.5, should have the berm inspected and a jersey barrier put in place. Sites 4 and 5 require a site visit before a decision is made.

2.5 Review of Quarterly Status Report (Due May 31)

SV gave a summary of the quarterly status report due on May 31, 2005. Quarterly Status Report Items **(Handout 4)** was reviewed to describe what would be provided in the report and no comments were made.

2.6 Discussion of Monitoring Volatile Organic Compounds (VOCs) in Storm Water Runoff
There was a discussion regarding sampling of VOC's and SVOC's. Smith stated that there are significant technical difficulties with collecting a valid VOC sample at the Sites. RFS said that the main concern is with SVOC's. Smith said that most of these are Polynuclear Aromatic Hydrocarbons (PAHs). The intent is to identify SVOC's that have a legacy with SWMUs. RFS suggested collecting run-on samples from sites showing PAH's and demonstrating that these are the causes for the SVOC levels. Smith explained that the organic suites are being prioritized to focus on the key contaminants for a Site. RFS said that was a good idea but recommended collecting samples at sites where PAH's are showing up as well as a sample at the source. Smith said it is still important to prioritize the organics. For example, regarding BMP stabilization, we need to monitor specific constituents to ensure that the BMP's are working. RP asked what happens if all constituents are non-detect except for one, would monitoring have to take place for all constituents? RFS and RP both thought that only the constituent in exceedence should continued to be monitored - not the entire suite of analytes. RFS asked if there were rainfall gages at the Sites. KB said that there are rainfall gages at some of the automated gage stations.

2.7 Proposed Format Changes to some FFCA Reports
SV recommended format changes to some of the FFCA reports for the annual data submittals in order to be consistent with the Consent Order report format. There was no objection to the possibility of reformatting some of the FFCA reports. SV agreed to have a proposed format change for the next meeting. Smith said the wSAL exceedance tables would stay the same. RFS asked that the SSC data please be included in the reports. SV said this would not be a problem.

2.8 Proposal for Umbrella Document for 2006
SV discussed combining the common elements in the SWMP and SMWU-AOC/SWPPP into a single 'umbrella document' for the 2006 submittal. SV recommended to combine similar parts of the documents and then to attach the annual sampling plans. SV agreed to put together an outline for the next meeting. Upon approval, it will then be presented to EPA.

2.9 Proposal to Change SSC Sample Collection Methodology
There was a discussion regarding the SSC sample collection methodology and the techniques used by the laboratories that are running the samples. It appears that the methodology being used for SSC samples is not what LANL expected. Smith recommended looking into this problem further.

The next SWAT meeting is tentatively scheduled for June 29, 2005.

Participants:
Rich Powell
Ralph Ford-Schmid
Greg Huey
Jennifer Ickes
Jean Dewart
Steve Veenis
Cathy Smith
Kevin Buckley
Deborah Apodaca Pesiri

SV/tml

Distribution
Ralph Ford-Schmid, NMED/OB, Santa Fe, NM,
Barbara Hoditschek, NMED/OB, Santa Fe, NM
Greg Huey, NMED/OB, Santa Fe, NM
Jennifer Ickes, NMED/OB, Santa Fe, NM
Gene Turner, NNSA/LASO, MS A316
Jean Dewart, ENV-ERS, MS M992
Mike Saladen, ENV-WQH, MS K497
Deborah Apodaca Pesiri, ENV-WQH, MS K497
Kevin Buckley, ENV-WQH, MS K497
Cathy Smith, ENV-WQH, MS K497

Cy: Taylor Sharpe, EPA Region VI, Dallas, TX
Marcy Leavitt, NMED/SWQB, Santa Fe, NM
Rich Powell, NMED/SWQB, Santa Fe, NM
James Bearzi, NMED/HWB, Santa Fe, NM
John Young, NMED/HWB, Santa Fe, NM
Kenneth Hargis, ENV-DO, MS J591
Doug Stavert, ENV-DO, MS J591
Alison Dorries, ENV-ECR, MS M992
Joe English, ENV-ECR, MS M992
Dave McInroy, ENV-ERS, MS M992
Steven Rae, ENV-WQH, MS K497
Mike Alexander, ENV-WQH, MS K497
Deb Woitte, LC-ESH, MS A187
Elmer Alcon, Shaw Environmental, MS M892
ENV-WQH File, MS K497