

General

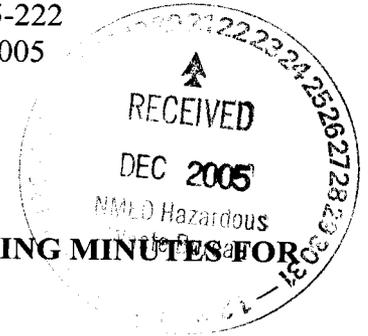


To/MS: SWAT Team Members Distribution  
From/MS: Steve Veenis, ENV-WQH, MS K497 SV  
Phone/Fax: 7-0013/5-9344  
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## memorandum

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

**SUBJECT: FINAL SURFACE WATER ASSESSMENT TEAM MEETING MINUTES FOR  
OCTOBER 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 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 REVIEW OF AUGUST 18, 2005 DRAFT MEETING MINUTES

At the last meeting, Rich Powell (RP) requested that we use initials for names in the meeting minutes. This change was made in the August meeting minutes and will be used from this point forward.

In the August 2005 SWAT meeting notes, there was a discussion about which permit program covered active D&D sites. During the August 2005 visit to EPA Region 6 Headquarters in Dallas, Steve Veenis (SV) and Mike Saladen (MS) spoke to Taylor Sharpe regarding this issue. Mr. Sharpe informed them that the goal of the Construction General Permit was no discharge so other permits regulating discharge would not apply. However, Mr. Sharpe acknowledged that if LANL wanted to go above and beyond the requirements that they wouldn't object to LANL enforcing both MSGP and CGP requirements at a particular site to ensure protection.

At the June 29<sup>th</sup> 2005 meeting, Ralph Ford-Schmid (RFS) asked when the wSALs would be updated to reflect the New Mexico water quality standards (WQS) amendments published in May 2005. SV asked RFS to send a corrected version of the WQS table and a list of the wSALs he thinks need to be changed or added. As of this meeting, SV has not received the list from RFS. SV indicated that this is not an urgent item but is following up with the SWAT because it was brought up by RFS and is of interest to the SWAT. (Action: RFS) SV indicated that the wSALs would be updated in the annual modification of the SWMP and SWPPP due March 2006.

Cathy Smith (CS) informed the SWAT that the Laboratory has installed 1 liter poly bottles for Suspended Sediment Concentration (SSC) at all the site-specific sampling locations.



SV informed the SWAT that the RUSLE training did occur. SV said that the SWAT should come up with a way to spread the word about available training that members hear about. SV said that in the future when someone on the SWAT receives a training opportunity that may be of interest to the other members it could be sent out via the SWAT email distribution list.

During the August meeting RFS asked if Kevin Buckley (KB) would visit some of the site specific sampling (SMA) locations with him because RFS had some concerns and questions about some of the sampling locations. Debbie Apodaca Pesiri (DAP) informed the SWAT that KB has not heard from RFS to set up this field visit. Barbara Hodicheck (BH) informed the SWAT that RFS has issues with the installation of the sampler at LA-SMA-5.3. Specifically the sampler is set at the edge of the water course and it should be moved because as it is now set, it appears to be sampling sheet flow. SV said he would talk with RFS about this location. (Action: KB, SV, RFS)

BH said she has been trying to use the WQH web site to access analytical data. She has been doing this without using Discover because it was stated at the last meeting that people could view data without Discover. BH said that Ken Mullen showed her how to work with the web site and told her the best way to view the data was with Discover. BH has used Discover but had trouble getting results:

- She asked for results to be exported to Excel but received a blank spreadsheet.
- She tried to find out locations where samples were collected and received spotty data.
- SV said he would look for installation discs of Discover.
- CS said she would access Discover from the web site and play with it so she would be familiar and could help BH. CS said that the intent of Discover is to replace the old version of the web site that used Oracle Forms. In theory, Discover is a more powerful tool because the user has the ability to create personal queries. There are pre-made queries in Discover based upon the most frequent requests for data.
- BH wanted to clarify that WQH data is not easily accessible with out Discover.
- If this is the case, SV said that WQH should not state that data is easily available.

It appears that several of these problems are related to security firewall issues at NMED. Other problems will be addressed by LANL by issuing "cryptocards" to users to allow direct access to database. SV requested that BH let him know if data access problems continue.

SV informed the SWAT that WQH asked Laboratory management if WQH could use data collected by the State or DOE/OB to supplement data collected by WQH for the FFCA. The managers and WQH have decided that the State's data can not be used to fulfill the FFCA requirements. However, the State's data could be used for comparison and supplemental information.

Review of No Exposure process from last SWAT meeting. There was a question about the application of No Exposure to individual sites vs. the entire facility. During the visit to EPA Region 6, SV and MS brought this issue up with Taylor Sharpe and he indicated that he was fine with the individual site concept and would discuss the issue with RP in the future.

BH wanted to know how the No Exposure Certification would be conducted. DPA responded that the No Exposure would be built in as part of the SWPP plan and we may seek EPA certification as allowed under the MSGP.

CS said that WQH is using the No Exposure process to identify sites that are eligible for monitoring. The No Exposure process will identify sites that would not require monitoring.

BH said that she would like a copy of the list when it is finished.

DAP explained that WQH is starting the process to evaluate the No Exposure list. WQH started with a total of 2153 Sites and subtracted 692 sites that had approved NFAs and 23 sites that do not exist which left a total of 1438 Sites for our potential candidate list. WQH will start with the candidate list and then prioritize the categories and gather supporting information for each site.

BH asked what the WQH monitoring plan for next year would look like since we are not sure of No Exposure sites.

SV informed the SWAT that WQH would be monitoring the sites identified in the FFCA.

SV added RFS and John Young to the FFCA reports distribution list. BH said she asked for a copy from RFS but has not received it yet. SV said he would provide BH with a copy. (Action: SV)

### **3.0 2005 ANNUAL SITE COMPLIANCE EVALUATIONS CONDUCTED AT FFCA SITES**

SV reported that the 2005 annual Site compliance evaluation effort was completed and some high lights are:

- 281 inspections completed;
- 13 Nuclear Environmental Sites (NES) were not inspected because of access requirements for Sites;
- 100 out of the 281 Sites require some level of maintenance;
- 75 out of the 100 Sites requiring maintenance have been completed, the remaining 25 are on hold due to pending excavation permits;
- 1055 inspections were conducted during 2005; and
- 190 of the Sites inspected during 2005 required some level of maintenance.

SV hopes that by next month WQH will have data back from the analytical laboratory to assess the effectiveness of BMPs.

### **4.0 DOE/OB BMP INSPECTIONS 2005**

BH reported that the NMED OB conducted 14 BMP inspections and sites that they monitored during 2005. BH and her crew used the LANL BMP inspection form and LA-UR-05-2191 for maps and to determine when BMPs were installed.

BH made the following statements and recommendations about the BMPs:

- a) Straw Wattles – many were found to be in a deteriorated condition and were not anchored. BH recommended that old wattles be mulched onto the Site.
- b) Bales – in most cases straw bales were not anchored and were found washed downstream. BH recommends that straw bales be mulched onto the Site.

- c) Silt Fences – BH recommends that they be extended further.
- d) Rock Check Dams – BH felt that most dams were too short in length and too shallow in height but were effective in slowing down flows.
- e) Jute mats – BH found most jute matting to be deteriorated. Sites with no vegetative growth should be re-evaluated for erosion potential.
- f) Gabions – BH found that most gabions were functional. At M-SMA-6 and 7 the gabions have been moved by high flows.
- g) Berms – BH found that many berms were in need of repair.
- h) Asphalt and concrete – BH recommends that these be used sparingly because they tend to increase sheet flow.
- i) Seeding – BH estimates that there is around 50% vegetative cover on seeded Sites.
- j) Rip Rap – BH noted that most rip rap appears to be stabilizing rills and gullies.

In addition, BH had several general comments about the BMPs on Sites:

- a) The maps and data sheets included in the SWPPP were very useful.
- b) The wattles at LA-SMA-6 were different than those used at other locations and were more effective.
- c) The juniper bale gabions used at CDV-SMA-2.4 were very effective.
- d) At LA-SMA-6.4 and 6.5 samplers were set below the bench and shows that sediment is settling at bench.
- e) The Laboratory needs to do a better job of controlling runoff from mesa tops.
- f) Many of the BMPs in LA, DP and Rendija Canyons are not maintained and need to be looked at.
- g) BMPs at eroded areas from the TA-21 potable water spill were not addressed in a timely manner.

SV suggested a separate meeting with BH to address her specific concerns. Shaw Environmental (contractor) will attend to discuss concerns and address discrepancies. BH said she provided a CD of her findings to Shaw and SV.

SV said he would compare BH comments to the Shaw inspections and will follow up with Shaw to set priority on BMP installation. SV agreed to present information on how the Laboratory is progressing on BMP installations at the next SWAT meeting. (Action: SV)

RP wanted to know why it had been so long since some Sites had been inspected. SV explained that LANL had identified errors in the SWPPP that were related to the SWTS tracking database. Some information regarding past inspections that had been completed was not input into SWTS prior to the generation of the SWPPP.

## **5.0 DISCUSSION ON THE COLLECTION OF REPRESENTATIVE SAMPLES**

SV outlined some ideas that the Laboratory has about what constitutes a representative sample. SV asked the SWAT what was needed to fill in the gaps for watershed based sampling. There have been comments that there is not a comfort level that the Laboratory's gage station network is adequately sampling all of the sites with erosion potential scores less than 40. The Laboratory would like to evaluate the distance of sources and hydrologic characteristics down stream to determine if gage stations are sited appropriately.

BH recalled that the SWAT had defined what a representative sample is. She suggested that we revisit the definition and have a discussion if our definition is still acceptable to all.

SV informed the SWAT that he would like to discuss the appropriateness of the erosion matrix score as a driver for the Individual Permit at the next meeting.

CS described the Laboratory's current approach to determining if a Site has a sampling location close enough to collect a representative sample. CS explained that the Laboratory has been using GIS to determine which sites with erosion scores less than 40 are co-located within an SMA boundary and then order them from upstream to downstream.

SV added that the use of GIS to determine the distance from a Site to a gage station will also be used.

For the next SWAT meeting SV asked the group to think about the definition of a representative sample. SV will send out an email reminding the group.

RP asked if Taylor Sharpe is considering watershed monitoring. RP has been told that EPA will not require watershed monitoring.

SV and MS informed the SWAT that Taylor Sharpe indicated that the permit would likely have both watershed and site-specific monitoring.

## 6.0 ACTION ITEMS FOR NEXT SWAT MEETING

Previous Action Items (July 19, 2005 and August 18, 2005)

- RFS will send SV a corrected version of the WQS table, and a list of the wSALs he thinks need to be changed and/or added after he has reviewed the new NM State Water Quality Standards. **(Ralph Ford-Schmid)**
- RP will continue to discuss the hierarchy of storm water programs with Taylor Sharpe and other parties as needed **(Rich Powell)**

New Action Items (October 19, 2005)

- SV said he would provide BH with a copy of FFCA Reports. **(Steve Veenis)**
- SV agreed to present information on how the Laboratory is progressing on BMP installations at the next SWAT meeting. **(Steve Veenis)**

### Participants:

Deborah Apodaca Pesiri (DAP)  
Bruce Gallaher (BG)  
Barbara Hoditschek (BH)  
Eric Galloway (EG)  
Rich Powell (RP)  
Steve Veenis (SV)  
Mike Saladen (MS)  
Cathy Smith (CS)

SV/lm

Distribution

Rich Powell, NMED/SWQB, Santa Fe, NM  
Sandy Spon, NMED/SWQB, Santa Fe, NM  
Ralph Ford-Schmid, NMED/OB, Santa Fe, NM  
Barbara Hoditschek, NMED/OB, Santa Fe, NM  
Eric Galloway, NMED/OB, Santa Fe, NM  
Gene Turner, NNSA/LASO, MS A316  
Greg Huey, NMED/OB, Santa Fe, NM,  
Jennifer Ickes, NMED/OB, Santa Fe, NM,  
Jean Dewart, ENV-ERS, MS J978  
Mike Saladen, ENV-WQH, MS K497  
Steve Veenis, ENV-WQH, MS K497  
Kevin Buckley, ENV-WQH, MS K497  
Cathy Smith, ENV-WQH, MS K497  
Deborah Apodaca Pesiri, ENV-WQH, MS K497

Cy: Taylor Sharpe, EPA Region VI, Dallas, TX  
Isaac Chen, EPA Region VI, Dallas, TX  
Marcy Leavitt, 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  
Jean Dewart, ENV-ERS, MS M992  
Dave McInroy, ENV-ERS, MS M992  
Alison Dorries, ENV-ECR, MS M992  
Joe English, ENV-ECR, MS M992  
Steven Rae, ENV-WQH, MS K497  
Mike Alexander, ENV-WQH, MS K497  
Phil Wardwell, LC-ESH, MS A187  
Elmer Alcon, Shaw Environmental, MS M892  
ENV-WQH File, MS K497