

General



To/MS: SWAT TEAM MEMBERS
From/MS: Steve Veenis, ENV-WQH, MS K497 SV
Phone/Fax: 7-0013/5-9344
Symbol: ENV-WQH: 06-096
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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 FEBRUARY 22, 2006

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 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 JANUARY 18th, 2006 DRAFT MEETING MINUTES

Steve Veenis (SV) asked the group if there were any comments on the January 18th SWAT meeting minutes. Several people commented that they had not had time to review the meeting minutes. SV requested that people review the meeting minutes and to provide any comments to him by January 27, 2006. SV will then finalize the meeting minutes and distribute to SWAT members (Action: ALL)

3.0 UPDATE ON INDIVIDUAL PERMIT DEVELOPMENT

SV provided an overview on the status of the Individual Permit development. Several teleconference calls with the EPA have occurred during the past months to discuss issues related to what the monitoring requirements would be for the permit. Isaac Chen (EPA) has proposed the use of a reasonable potential (RP) analysis to determine what constituents would require monitoring. The RP is calculated using the concentration of a constituent found in storm water, multiplied (x) by 2.13 and then compared to the existing standard. If found to be higher than the standard, a reasonable potential exists that this analyte could cause an exceedance of the applicable standard and would require monitoring. If the RP was not exceeded, monitoring for that constituent would not be required. SV stated that he understood that the RP analysis was for determining what to look for, and not for what would drive a corrective action.



RFS and BH expressed a concern that not all constituents have an applicable standard and therefore could be missed during the RP analysis and the permitting process. They were particularly concerned about how radionuclides would be addressed under the individual permitting process. BH mentioned that Rocky Flats had developed their own standard for plutonium.

SV told the group that the Laboratory intends to cover all SWMUs and the AOCs listed in the FFCA (those scoring >40 on SOP 2.01) under the individual permit. Additionally, the AOCs that scored <40 would be covered voluntarily to address the potential for contaminant migration from those sites since they do not meet the definition of "industrial activity" in storm water regulations. RP stated that permit may not necessarily be required to cover only industrial activities and that some groups may push for effluent limits as a requirement of the permit. EPA has stated that effluent limits would not be a permit requirement.

SV showed the team a flow diagram that the Laboratory had developed to show the processes involved in transitioning between the current FFCA and the individual permit development. The diagram is organized into three "modules" that defined the process of; 1) defining the pollutants of concern, 2) establishment of representative sample locations and, 3) determination of corrective actions when threshold is exceeded. SV said that the diagram will be provided to all once the LA-UR # is obtained through security review.

BH asked how Sites would be removed from permit once they are listed. CS stated that Sites would not be removed until a formal NFA (certificate of completion) had been issued by NMED/HWB. GT stated that the "No Exposure" process identified in the MSGP could be used to remove sites from the permit. He suggested listing these sites within the current SWPPP. RP agreed that this process was an appropriate way to remove sites from permit coverage, but would like the effort to be conducted with both HWB and SWQB.

A handout was provided that described the criteria and process for determining representative outfall locations at TA-21. The step-wise process described; 1) a review of existing soil/sediment data at Sites, 2) review of SOP 2.01 erosion assessments, 3) similar runoff coefficient for Site, 4) similar precipitation characteristics, 5) drainage areas and, 6) existing BMPs. The team agreed that these criteria were appropriate and the process was good.

SV provided a map showing SWMUs/AOCs, SMA drainage areas, gage stations, canyon reaches and a .5 mile drainage pattern for gage stations. SV described a proposed approach to monitoring storm water runoff from Sites within SMA boundaries, Sites not within SMA but within .5 mile radius and the use of representative outfall provision for all other sites that were not located within these boundaries. RP suggested that the .5 mile radius was not relevant since site-specific monitoring will likely be the requirement of the permit. SV stated that in some cases the gages may be collecting representative samples and that the Laboratory would propose to use them. SV also mentioned that if NMED does not support the use of gage stations to collect representative samples, then the Laboratory may discontinue the use of the gages.

4.0 PROPOSAL FOR 2006 wSALS

Cathy Smith (CS) provided a table of the proposed revisions to the water screening action levels (wSAL) values to be implemented for the 2006 monitoring year. The wSAL for a pollutant is designated as the lowest numeric criterion of the applicable New Mexico Water Quality Control Commission (NMWQCC) water quality criteria (WQC) established in *State of New Mexico Standards for Interstate and Intrastate Surface Waters* (NMAC 20.6.4) (New Mexico 2006), if one exists. Significant changes were made in the NMWQCC stream standards that became effective on July 17, 2005 that impact FFCA/AO storm water runoff monitoring. The most significant change is the classification of all surface waters within the Laboratory boundary with segment-specific designated uses. As a result, two different types of wSALS are proposed for the 2006 monitoring year: Perennial wSALS and Ephemeral wSALS. The Perennial wSALS would apply to storm water runoff samples collected at Sites that discharge to a perennial reach included in the 20.6.4.126 classification. The Ephemeral wSALS would apply to storm water runoff samples collected at Sites that discharge to an ephemeral/intermittent reach included in the 20.6.4.128 classification.

The Perennial wSAL values were determined by evaluating the following numeric criteria applicable to the designated uses: Livestock Watering, Wildlife Habitat, Acute Aquatic Life, Chronic Aquatic Life, Human Health (persistent, carcinogenic, and toxic), and acute and chronic total ammonia. The Ephemeral wSAL values were determined by evaluating the following numeric criteria applicable to the designated uses: Livestock Watering, Wildlife Habitat, Acute Aquatic Life, Human Health (persistent), and acute total ammonia.

Comments can be provided directly to CS or SV. The proposed 2006 wSALS will be included in the annual update to the *LANL Storm Water Pollution Prevention Plan for SWMUs and AOCs*, which will be submitted to EPA and NMED on March 31, 2006.

5.0 UPDATE FROM DATA ANALYSIS WORKING GROUP (DAWG)

The DAWG has the following core participants: David Englert, Ralph Ford-Schmid, Barbara Hoditschek (all of NMED/DOE-OB), and Cathy Smith (LANL/WQH). The DAWG met on January 26 and February 1, 2006 to review the monitoring results for SMAs in upper Los Alamos Canyon. On February 14, 2006 the DAWG conducted a site visit at five upper Los Alamos SMAs in order to assess sampler locations, Los Alamos County run-on issues, and BMP installations. The DAWG was accompanied by personnel from LANL/WQH, LANL Remediation Services Program, and NMED/HWB. The SMAs visited included LA-SMA-2 (Hillside 140), LA-SMA-3 (Bailey Bridge Site), LA-SMA-4 (Hillside 137), LA-SMA-5 (Hillside 138), LA-SMA-5.2 (Can Dump Site), and LA-SMA-5.5 (Omega West Site).

Recommendations have been made for tailored monitoring suites, additional monitoring locations, and BMP improvements for the upper Los Alamos Canyon SMAs. The 2006 *LANL Storm Water Monitoring Plan*, which will be submitted to EPA and NMED on March 31, 2006, will incorporate the DAWG recommendations for continued monitoring.

6.0 OTHER ITEMS

The next SWAT meeting will be held in April due to the FFCA deadlines occurring in March.

Participants:

Barbara Hoditschek (BH)
Ralph Ford Schmid (RFS)
Rich Powell (RP)
Steve Veenis (SV)
Cathy Smith (CS)
Kevin Buckely (KB)
Jeff Walterscheid (JW)
Greg Kuyumjian (GK)
Gene Turner (GT)

SV/tml

Distribution

Rich Powell, NMED/SWQB, Santa Fe, NM
Lynette Guevara, NMED/SWQB, Santa Fe, NM
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Steve Veenis, ENV-WQH, MS K497
Cathy Smith, ENV-WQH, MS K497

Cy: Taylor Sharpe, EPA Region VI, Dallas, TX
Isaac Chen, EPA Region VI, Dallas, TX
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Phil Wardwell, LC-ESH, MS A187
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