



GARY E. JOHNSON
GOVERNOR

Permit (order)
State of New Mexico
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
Telephone (505) 827-0187
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PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

Certified Mail - Return Receipt Requested

May 7, 2001

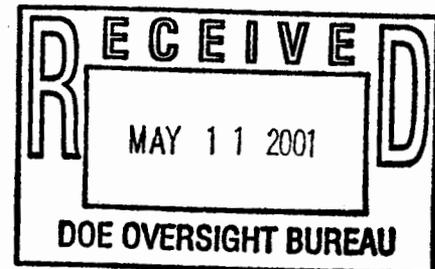
Dennis J. Erickson, Director
Environment, Safety, and Health Division
Los Alamos National Laboratory
P.O. Box 1663 Mail Stop K491
Los Alamos, New Mexico 87545

RE: NPDES Storm Water Compliance Evaluation Inspection, PRS #1-002, NPDES #NMR05A734 & NMR05A735, April 26, 2001

Dear Mr. Erickson:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, and are required per Part 4.10 of the multi-sector general storm water permit, to amend your Storm Water Pollution Prevention Plan as appropriate based on the findings of this report to incorporate additional structural and non-structural controls as needed to eliminate or significantly minimize pollutants in storm water discharges. Further, you are encouraged to notify in writing, both USEPA and NMED regarding modifications and compliance schedules.



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Mr. Dennis J. Erickson
May 7, 2001
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My thanks for the help and cooperation of Messrs. Mike Alexander, Robin Reynolds, and Steve Veenis, during this inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 827-2798.

Sincerely,



Richard E. Powell
Surface Water Quality Bureau

xc: USEPA, Dallas (2 copies)
USEPA, NPDES Permits Branch (6WQ-P)
Taylor Sharpe, USEPA (6EN-WT)
NMED, District II, Santa Fe
James Bearzi, NMED, HMB
John Parker, NMED, DOE Oversight Bureau, 2044A Galisteo Street, Santa Fe, New Mexico 87505
Joe Vozella, DOE/LAAA, 5283 35th Street, Los Alamos, New Mexico 87544
Julie Canepa, Los Alamos National Laboratory, P.O. Box 1663 Mail Stop K491, Los Alamos, New Mexico 87545



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES <u>7</u> <u>3</u> <u>5</u>											yr/mo/day			Inspec. Type		Inspector		Fac Type							
1	N	2	5	3	N	M	R	0	5	A	7	3	4	11	12	0	1	0	4	2	6	17	18	W	19	S	20	2
Remarks																												
D O E N A T I O N A L L A B O R A T O R Y																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67						70						71		72		73 74 75 80												

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) USDOE (NMR05A735) & UNIVERSITY OF CALIFORNIA (NMR05A734)/LOS ALAMOS NATIONAL LABORATORY (LANL), LOS ALAMOS, NM. - ACID CANYON SWMU#1-002 LOS ALAMOS COUNTY		Entry Time /Date 0945/4-26-01	Permit Effective Date 10-30-00
		Exit Time/Date 1605/4-26-01	Permit Expiration Date 10-30-05
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) *MIKE ALEXANDER, TEAM LEADER ESH-18, 505-665-4752 *ROBIN REYNOLDS, ESH-18 STAFF, 505-667-4689 *STEVE VEENIS, ESH-18 STAFF		Other Facility Data LAT 35 53 07.0 LONG -106 18 23.3	
Name, Address of Responsible Official/Title/Phone and Fax Number DENNIS ERICKSON, DIVISION DIRECTOR, ENVIRONMENT, SAFETY, AND HEALTH DIVISION, LOS ALAMOS NATIONAL LABORATORY, P.O. BOX 1663 MAIL STOP K491, LOS ALAMOS, NM 87545		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	U	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- LANL IS A U.S. DEPARTMENT OF ENERGY FACILITY OPERATED BY THE UNIVERSITY OF CALIFORNIA
- PRS #1-002 IS A SOLID WASTE MANAGEMENT UNIT (SWMU) ALSO PERMITTED BY THE NEW MEXICO ENVIRONMENT DEPARTMENT/HAZARDOUS WASTE BUREAU (PERMIT #NM0890010515)
- SEE REPORT AND FURTHER EXPLANATIONS

RICHARD E. POWELL 	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date 5-7-01
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

Storm Water Industrial General Permit
Pollution Prevention Plan

CHECKLIST

USDOE - University of California / Los Alamos National Laboratory		DATE: 4-26-01	PERMIT NO: NMR05A 734 : 735
POLLUTION PREVENTION TEAM			
MEETS PERMIT REQUIREMENTS. DETAILS:		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>No</u>)	
1. IDENTIFY SPECIFIC INDIVIDUALS.		Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
2. OUTLINE INDIVIDUALS RESPONSIBILITIES.		Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
DESCRIPTION OF POTENTIAL POLLUTANT SOURCES			
MEETS PERMIT REQUIREMENTS. DETAILS:		S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>Yes</u>)	
1. SITE MAP INDICATING.		S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
a) DRAINAGE AREAS		Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
b) DRAINAGE PATTERNS AND OUTFALLS <i>Not outfalls</i>		Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
c) STRUCTURAL AND NON-STRUCTURAL CONTROLS		Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
d) SURFACE WATERS		Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
e) SIGNIFICANT MATERIALS EXPOSED TO PRECIPITATION		Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
f) LOCATION OF LEAKS/SPILLS WHICH HAVE OCCURED IN THE LAST 3 YEARS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
g) LOCATION OF INDUSTRIAL ACTIVITIES EXPOSED TO PRECIPITATION		Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
FUELING STATIONS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
MAINTENANCE OR CLEANING AREAS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
LOADING/UNLOADING AREAS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
WASTE TREATMENT, STORAGE OR DISPOSAL AREAS		Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
LIQUID STORAGE TANKS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
PROCESSING AREAS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
STORAGE AREAS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
2. LIST OF POLLUTANTS LIKELY TO BE PRESENT IN DISCHARGES. <i>Not all</i>		S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
3. DESCRIPTION OF SIGNIFICANT MATERIALS HANDLED, TREATED, STORED OR DISPOSED OF SUCH THAT EXPOSURE TO STORM WATER OCCURED IN THE LAST 3 YEARS.		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
a) DESCRIPTION OF THE METHOD AND LOCATION OF STORAGE OR DISPOSAL		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
b) DESCRIPTION OF ALL MATERIAL MANAGEMENT PRACTICES		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
c) DESCRIPTION AND LOCATION OF EXISTING STRUCTURAL AND NON-STRUCTURAL CONTROLS		Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/>	
4. SUMMARY OF EXISTING STORM WATER SAMPLING DATA		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
5. DESCRIPTION OF AREAS WITH A HIGH POTENTIAL FOR SIGNIFICANT SOIL EROSION		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
6. A NARRATIVE SUMMARIZING POTENTIAL POLLUTANT SOURCES		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	

Storm Water Industrial General Permit
Pollution Prevention Plan

CHECKLIST

USDOE & University of California / Los Alamos National Laboratory		DATE: 4-26-01	PERMIT NO. NMR05A734 & 735
DESCRIPTION OF APPROPRIATE MEASURES AND CONTROLS			
MEETS PERMIT REQUIREMENTS.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>Yes</u>)	
DETAILS: <i>have done SWAT assessment but no implementation.</i>			
1. GOOD HOUSEKEEPING PROCEDURES.	<i>SWPPP says NA</i>	S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
2. PREVENTIVE MAINTENANCE PROCEDURES.	<i>" " "</i>	S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
3. SPILL PREVENTION AND RESPONSE PROCEDURES.	<i>" " "</i>	S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
4. INSPECTION PROCEDURES.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
5. EMPLOYEE TRAINING PROGRAM.	<i>none done yet</i>	S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
6. RECORDKEEPING AND INTERNAL REPORTING PROCEDURES		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
7. NON-STORM WATER DISCHARGE CERTIFICATION.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
a) IDENTIFY AUTHORIZED NON-STORM WATER DISCHARGES AND APPROPRIATE CONTROLS		Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
8. EROSION AND SEDIMENT CONTROLS FOR AREAS WITH HIGH EROSION POTENTIAL.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
9. A NARRATIVE CONSIDERATION OF TRADITIONAL STORM WATER MANAGEMENT PRACTICES.		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
10. PLANS FOR IMPLEMENTATION AND MAINTENANCE OF TRADITIONAL MEASURES APPROPRIATE.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
ANNUAL SITE COMPLIANCE EVALUATION REPORTS			
MEETS PERMIT REQUIREMENTS.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>Yes</u>)	
DETAILS:			
1. SUMMARY OF THE SCOPE OF THE INSPECTION.		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
2. PERSONNEL MAKING THE INSPECTION.		S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input type="checkbox"/>	
3. MAJOR OBSERVATIONS.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
4. ACTIONS TAKEN TO REVISE THE POLLUTION PREVENTION PLAN.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
5. CERTIFICATION OF COMPLIANCE OR A LIST OF INCIDENTS OF NON-COMPLIANCE.		S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
COMPLIANCE WITH MUNICIPAL STORM WATER MANAGEMENT REQUIREMENTS			
MEETS PERMIT REQUIREMENTS.		S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>No</u>)	
DETAILS:			
CONSISTENCY OF POLLUTION PREVENTION PLAN WITH OTHER PLANS			
MEETS PERMIT REQUIREMENTS.		S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>No</u>)	
DETAILS:			
SALT STORAGE PILES ONSITE COVERED OR ENCLOSED			
MEETS PERMIT REQUIREMENTS.		S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (FURTHER EXPLANATION ATTACHED <u>No</u>)	
DETAILS:			

**Compliance Evaluation Inspection
LANL SWMU #1-002/Acid Canyon
NPDES Permit #NMR05A734 & NMR05A735, April 26, 2001**

Further Explanations

Introduction

On April 26, 2001, a Compliance Evaluation Inspection was conducted at the Los Alamos National Laboratory (LANL) located at Los Alamos, New Mexico by Richard E. Powell of the State of New Mexico Environment Department (NMED). The purpose of this inspection was to document the permittee's status regarding the NPDES multi-sector general storm water permit for industrial activities (this facility has industrial activities being conducted on-site that meet the descriptions of industrial activities in section H) and storm water regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

LANL (University of California) applied for, and was granted permit coverage under the NPDES multi-sector general storm water permit (MSGP) 2000 and is assigned permit #NMR05A734 (USDOE - #NMR05A735). LANL applied under activity code HZ although the permit is intended to provide coverage for storm water discharges for approximately 999 SWMUs as well as various other potential release sites, landfills, asphalt plants, manufacturing facilities, etc. This inspection involved a review of the Storm Water Pollution Prevention Plan (SWPPP) for only one SWMU (although the findings likely apply to other similar areas). SWMU #1-002 encompasses all of the South Fork Acid Canyon and part of Acid Canyon in which are located several areas with varying levels of contamination. The SWMU was formed due to discharges into South Fork Acid Canyon from activities associated with the past operation of a radioactive waste treatment facility (TA45). The land upon which this SWMU is located has been deeded to Los Alamos County. However, LANL retains responsibility for the SWMU (e.g., LANL is the owner/operator of the SWMU but not the land upon which the SWMU is located). Storm water runoff from this site discharges to South Fork Acid Canyon; thence to Acid Canyon; thence to Pueblo Canyon; thence to Los Alamos Canyon; thence to the Rio Grande in Segment 20.6.4.114 of the Rio Grande Basin. This report is based on a review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the permittee's representatives.

An entrance interview was conducted with Mr. Mike Alexander, ESH-18 Team Leader, Mr. Robin Reynolds, ESH-18 Staff, and Mr. Steve Veenis, ESH-18 Staff at approximately 0945 hours on April 26, 2001. The inspector, who was accompanied by Messrs. Bret Lucas and Steve Yanicak also with NMED, made introductions, presented his credentials and discussed the purpose of the inspection.

There was a SWPPP, last updated during October 2000, available for review at the site on the date of this inspection. This plan generically covers activities under Sector K for all 999 SWMUs at this facility, with specific parts, grouped by type (1-002 is grouped under TSDs), for New Mexico Hazardous Waste Bureau permitted SWMUs. It is possible that SWMU #1-002 could, and perhaps should, be addressed as a land application area or open dump under Sector L

since the discharges which created this SWMU appear to be the result of "industrial activity" as defined in 40 CFR Part 122.26. Some of the major findings, noted on the checklist, are as follows:

Storm Water Pollution Prevention Plan (SWPPP)

Description of Potential Pollutant Sources: Overall rating of "Marginal"

Part 4.1.1 of the permit requires that permittees "Identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges from your facility."

The permit requires that this description include such things as a site map, an identification of the types of pollutants that are likely to be present in storm water discharges, an inventory of the types of materials handled at the site that potentially may be exposed to precipitation, a list of significant spills and leaks of toxic or hazardous pollutants, sampling data, a narrative description of the potential pollutant sources from specific activities at the facility, and identification of specific potential pollutants.

As above, the permittee has prepared a SWPPP for this facility. However, the site map does not include outfall locations, drainage areas, arrows or another means of indicating drainage flow patterns (map is a contour map), all surface waters (Acid Canyon is not indicated), or structural and non-structural controls (there are none). Although the SWPPP indicates that this site is inactive, it is an active SWMU which is not isolated or revegetated. In addition, the SWPPP does not appear to identify all pollutants or pollutant parameters (i.e., total suspended solids, total dissolved solids, dust, turbidity, pH, radionuclides, etc. - SWPPP only indicates Plutonium-238 & Plutonium-239) likely to be present in storm water discharges.

This site was previously covered under the 1995 MSGP (NMR05A509 issued on 12-25-98 & NMR05A532 issued on 12-30-98). Since LANL did not obtain MSGP coverage until the 2nd quarter of the 4th year of the permit, the permittee should have conducted, or attempted to conduct, required "Analytical Monitoring" during the 3rd & 4th quarters of the 4th year of the permit and reported the results of these analyses on Discharge Monitoring Reports (DMRs). According to the permittee's representatives, this required monitoring and reporting was not done.

Furthermore, during this inspection, the permittee's representatives indicated that the proposed storm water sampling location for this site is somewhat downstream (in Acid Canyon) of the SWMU, not at the outfall locations where storm water runoff actually enters a receiving water (e.g., South Fork Acid Canyon and Acid Canyon). Although an ambient stream sampling program is a worthy undertaking, this sampling scheme is likely not appropriate for NPDES compliance monitoring purposes. As stated in Part 5.1.2, "The results of benchmark monitoring are primarily for your use to determine the overall effectiveness of your SWPPP in controlling pollutants to **receiving waters.**" (emphasis added) The MSGP does, however, provide an alternative to sampling each and every outfall location. As stated in Part 5.2.4 under Representative Outfalls - Essential

Identical Discharges, "If your facility has two (2) or more outfalls that you believe discharge substantially identical effluents, based on similarities of the industrial activities, significant materials or storm water management practices occurring within the outfalls' drainage areas, you may test the effluent of just one of the outfalls and report that the quantitative data also applies to the substantially identical outfall(s)." For instance, in this case, LANL might be able to justify sampling from one of the "hot spot" drainage areas and perhaps from a more typical drainage area. For this to be permissible, LANL must include sufficient documentation in the SWPPP and with the DMRs to support this belief. The permittee must explain in detail why the outfalls are expected to discharge substantially identical effluents, including an estimate of the size of the drainage areas, and an estimate of the runoff coefficient of the drainage areas, etc. for each outfall that the permittee believes is representative. The permittee must also include the description of the location of each of the outfalls, an explanation of why each outfall is expected to discharge substantially identical effluents, and an estimate of the size of the drainage area and runoff coefficient.

The permittee has also not conducted any of the required (see Part 5.1.1) quarterly visual examinations of storm water discharges. Quarterly visual exams should have been conducted during each quarter since permit issuance (at least since December 25 or 30, 1998) at each storm water outfall.

Description of Appropriate Measures and Controls: Overall rating of "Unsatisfactory"

Part 4.2.7 of the permit requires that the permittee, "Describe the type and location of existing non-structural and structural best management practices (BMPs) selected for each of the areas where industrial materials or activities are exposed to storm water," and describe appropriate proposed BMPs for areas not yet affected, and implement such controls. Selection of BMPs should take into consideration "The quantity and nature of the pollutants, and their potential to impact the receiving waters."

Note that the potential for specific pollutants to be discharged in storm water runoff such that they may adversely impact water quality of receiving waters is the defining mechanism which drives the selection of reasonable and appropriate BMPs designed to eliminate or significantly minimize these pollutants in storm water runoff. These pollutants must be identified in the site assessment based on the potential pollutant sources identified during preparation of the SWPPP and appropriate controls implemented/installed to control these pollutants. Sector specific analytical monitoring includes only parameters which EPA, based on statistical analyses of limited data submitted in the MSGP development process, believes are the most likely to be of concern for the majority of the TSDFs who participated in the MSGP application process for Sector K. These requirements are not intended to limit the assessment and control of the wide range of pollutants potentially contained in storm water discharges from the diverse facilities and potential pollutant sources covered under this (or any other) sector (this issue came up in the exit interview).

Non-structural and structural BMPs to be described and implemented by the permittee include such things as good housekeeping, preventive maintenance, spill prevention and response procedures, periodic inspections, employee training, record keeping, non-storm water evaluations and

certifications, sediment and erosion control, as well as implementation/maintenance of traditional storm water management practices, where appropriate.

Although there has been an assessment of the potential pollutants within this SWMU, and the permittee has developed a preliminary list of recommended storm water management controls, there has been no implementation/installation of the above (or other) structural and non-structural BMPs to date. The entire site has apparently not yet been thoroughly assessed, but there are several well identified "hot spots" in this area which seem to be contributing the majority of the pollutant load to the receiving stream. At the very least, the permittee should have implemented appropriate BMPs within these "hot spot" areas to minimize pollutants in storm water runoff until such time that these sites are remediated and the pollutant load into "waters of the United States" reduced to levels which ensure long term compliance with water quality standards.

Also, the required, signed non-storm water evaluation certification and evaluation (see Part 4.4) is not included, and there is no description of results of tests/evaluations, evaluation criteria or testing methods used, dates of any testing and/or evaluation, or any other information upon which the certification decision could be based.

Annual Site Compliance Evaluation Reports: : Overall rating of "Unsatisfactory"

Part 4.9 of the permit states, in part, "You must conduct facility inspections at least once a year. The inspections must be done by qualified personnel provided by you."

Per Part 4.9 of the permit, the required annual site compliance evaluation must be done by "qualified personnel that are knowledgeable and possess the skills to assess conditions at your facility that could impact storm water quality and assess the effectiveness of the BMPs" This inspection must include a comprehensive evaluation of the SWPPP and the entire facility, including effectiveness of current measures and controls, and identification of current and anticipated potential pollutant sources. The evaluation should include a review of the SWPPP to ascertain that all required inspections, maintenance, and good housekeeping activities are conducted and recorded, and that these activities are effective in controlling pollutant loads in storm water runoff. It should also include a review of visual and analytical monitoring results, and result in appropriate revisions to the SWPPP that describe, and provide for, implementation of any required changes/additions in a timely manner.

Based on this inspection, the operator(s) must prepare, and keep with the SWPPP, a properly signed report (and reports documenting any follow-up actions taken) signed by a cognizant official or an authorized representative (see Part 9.7 of the permit) which summarizes the scope of the inspection, includes the name(s) and qualifications of personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the SWPPP, and any incidents of non-compliance (or a certification that the facility is in compliance with the SWPPP and the permit).

The permittee does an annual review of the SWPPP for this SWMU but apparently has taken no actions in response to the annual evaluation to revise the plan to include appropriate BMPs and insure that other activities to comply with various requirements of the MSGP, such as sampling, inspections, etc., are being completed in a timely manner.

An exit interview to discuss the findings of this inspection was conducted from approximately 1505 - 1605 hours on April 26, 2001 with Messrs. Alexander, Reynolds, and Veenis as well as Mr. Steve Rae, ESH-18 Group Leader and Mr. Ken Mullen representing LANL, at the ESH-18 office.