

Environmental Programs

P.O. Box 1663, MS M991  
Los Alamos, New Mexico 87545  
(505) 606-2337/FAX (505) 665-1812

Permit

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ENTERED



National Nuclear Security Administration  
Los Alamos Site Office, MS A316  
Environmental Restoration Program  
Los Alamos, New Mexico 87544  
(505) 667-4255/FAX (505) 606-2132

Date: May 29, 2008  
Refer To: EP2008-0231

Ms. Sonia Hall  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Water Enforcement Branch (6EN-WC)  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733



**Subject: Submittal of the Federal Facility Compliance Agreement Docket No. CWA-06-2005-1701, and Administrative Order Docket No. CWA-06-2007-1716 at Los Alamos National Laboratory, Permit Application No. NM0030759, Quarterly Status Report (January 1, 2008, to March 31, 2008)**

Dear Ms. Hall:

Enclosed for your review is the Quarterly Status Report for Los Alamos National Laboratory in accordance with the Federal Facility Compliance Agreement (FFCA) Docket No. CWA-06-2005-1701, dated February 3, 2005, and the Administrative Order (AO) Docket No. CWA-06-2007-1716 dated November 16, 2006. The Quarterly Status Report includes corrective action activities required under the FFCA and AO for the period from January 1, 2008, through March 31, 2008.

The Quarterly Status Report details the overall progress on FFCA, 1st Quarter 2008 – January 1, 2008 to March 31, 2008. Please contact Steve Veenis at (505) 667-0013 (veenis@lanl.gov) or Gene Turner at (505) 667-5794 (gturner@doeal.gov) if you need additional information concerning the status of the Laboratory's corrective action activities.

Sincerely,

Susan G. Stiger, Associate Director  
Environmental Programs  
Los Alamos National Laboratory

Sincerely,

Gene Turner  
Environmental Operations  
Los Alamos Site Office



SS/DG/PH/SV:sm

Enclosure: Quarterly Status Report (January 1, 2008, to March 31, 2008)

Cy: (w/enc.)

Isaac Chen, USEPA - Region 6, Dallas, TX  
Jana Harvill, USEPA - Region 6, Dallas, TX  
Ralph Ford-Schmid, DOE-OB, Santa Fe, NM  
Marcy Leavitt, NMED-SWQB, Santa Fe, NM  
John Young, NMED-HWB, Santa Fe, NM  
Alison Bennett, DOE-LASO (date-stamped copy emailed)  
Steve Veenis, ENV-RCRA, MS K490  
Cathy Smith, ENV-RCRA, MS K490  
Peggy Reneau, EP-WES, MS M992  
EP-LWSP File, MS M992  
RPF, MS M707

Cy: (w/o enc.)

Steve Yanicak, NMED-OB, White Rock, NM  
Susan G. Stiger, ADEP, MS M991  
Paul R. Huber, EP-LWSP, MS M992  
Danny Katzman, EP-LWSP, MS M992  
Victoria George, ENV-DO, MS J978  
Tony Grieggs, ENV-RCRA, MS K490  
Terrill Lemke, ENVP-RCRA, MS K490  
Tina Sandoval, ENV-RCRA, MS K490  
Mike Saladen, ENV-RCRA, MS K490  
Suzanne Coyne, IRM-DCS, MS K490  
Susan McMichael, LC-ESH, MS A187  
IRM-RMMSO, MS A150

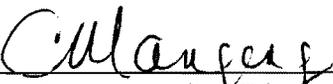
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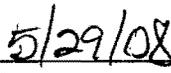
QUARTERLY STATUS REPORT  
JANUARY 1 – MARCH 31, 2008  
INDIVIDUAL PERMIT APPLICATION NUMBER NM0030759

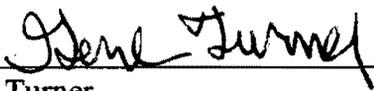
**CERTIFICATION STATEMENT OF AUTHORIZATION**

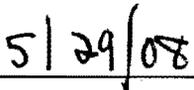
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"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

  
\_\_\_\_\_  
Sue Stiger, Associate Director  
Environmental Programs  
Los Alamos National Laboratory

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Gene Turner  
Environmental Permitting Manager  
Department of Energy  
Los Alamos Site Office

  
\_\_\_\_\_  
Date

**A. DEADLINES AND MILESTONES**

January 18, 2008	Supplemental Information Submittal Three Addendum for NPDES Permit Application NM0030759 transmitted to EPA and NMED
January 18, 2008	Supplemental Information Submittal Four for NPDES Permit Application NM0030759 transmitted to EPA and NMED
January 25, 2008	wSAL Exceedance Report submittal, EPA and NMED
February 14, 2008	Final Supplemental Information for NPDES Permit Application NM0030759 transmitted to EPA and NMED
February 28, 2008	wSAL Exceedance Report submittal, EPA and NMED
March 4, 2008	Administrative Record Documentation, for NPDES Permit Application NM0030759 transmitted to EPA and NMED
March 28, 2008	wSAL Exceedance Report submittal, EPA and NMED

**OVERALL PROGRESS**

- ★ 28 SNOW MELT RUNOFF SAMPLES WERE COLLECTED DURING THE 1ST QUARTER OF 2008.
- ★ 62 GAGE STATIONS AND ~144 SMA STATIONS PREPARED FOR INSTALLATION & INITIATION FOR UPCOMING MONITORING YEAR DURING Q1 2008.
- ★ FINAL SUPPLEMENTAL INFORMATION FOR THE INDIVIDUAL PERMIT APPLICATION COVERING 411 SITES WAS PROVIDED TO EPA IN Q1 2008.

**B. PROGRESS MADE IN MEETING OTHER DEADLINES & MILESTONES**

During the first quarter (Q1) of 2008, samplers were disassembled to protect equipment from damage and breakage during the period of adverse winter weather conditions. However, snowmelt runoff grab samples were collected at some watershed gage station locations during Q1. Details of the sampling status for are provided in Table 1, *2008 Q1 Watershed-Scale Monitoring Status*. Configuration and siting of samplers at Site Monitoring Areas (SMAs) was initiated during March 2008.

Highlights of FFCA activities in Q1 of 2008 include

- ✓ 28 snow melt samples were collected at 28 watershed gage station locations;
- ✓ Preparation of ~144 SMA samplers for the 2008 monitoring year; and,
- ✓ Preparation of ~62 gage stations for the 2008 monitoring year.

**C. CORRECTIVE ACTIONS TAKEN TO ADDRESS WSAL EXCEEDANCES**

The FFCA at paragraph ¶ 24 requires DOE to provide a quarterly status report on corrective actions taken to address wSAL exceedances. Specifically, the FFCA requires DOE to review data from storm water monitoring conducted at the SMAs. Where results are above water screening action levels (wSAL), LANL is required to conduct an investigation to determine the source within 30 days of receipt of the data and evaluate BMPs in accordance with the requirements imposed by the FFCA to determine if corrective action is required. For purposes of the FFCA, corrective action may include: install, re-examine, repair, modify BMPs, or source

identification to control or eliminate the source or migration of pollutants or contaminants. No storm water runoff samples were collected at SMAs during Q1 due to adverse climatic conditions.

**D. DESCRIPTION OF MATTERS RELEVANT TO STATUS OF COMPLIANCE**

***D1. VISUAL MONITORING AND SAMPLING ACTIVITIES***

Visual monitoring of the collected storm water monitoring samples is conducted pursuant to the MSGP under EPA's approved 2007 SMWU/SWPPP at FFCA gage stations and SMA samplers. The Facility is required to obtain four (4) monitoring samples on an annual basis (i.e., on or before December 31, 2008) and to visually examine these samples at the time of collection. Quarterly monitoring is not required under the MSGP because the Laboratory has a general waiver that allows collection of four samples annually due to weather conditions that do not allow for sampling to be spaced evenly during the year (§ 5.3.1). Four annual samples are also authorized under the FFCA. In addition, the majority of the Sites are located in areas that are unstaffed, inactive, and cannot be feasibly reached within 30 minutes of a qualifying storm event. 'No flow' certifications are prepared and filed on a quarterly basis for those stations that did not have a qualifying storm event and thus were unable to collect a sample (i.e., insufficient flow to produce a discharge in volumes large enough to allow sample collection).

During Q1, a total of 28 analytical and visual monitoring snowmelt runoff samples were collected at the watershed gage station locations as summarized in Table 1.

***D2. BMP INSPECTION AND MAINTENANCE***

During the Q1 reporting period, no BMP inspection and maintenance activities at SMAs were conducted. However, material purchases, implementation of process improvements and field planning activities for remainder of 2008 were implemented.

***D3. NPDES INDIVIDUAL PERMIT APPLICATION ACTIVITIES***

The information required to update and complete the individual permit application was provided in the Final Supplemental Information Submittal transmitted on February 14, 2008. The Supplemental Information Submittal Three updated Form 2F Sections I, III, and IV and was submitted on December 21, 2007. The Supplemental Information Submittal Three Addendum provided additional Form 2F information for three additional Sites identified for inclusion on the Individual Permit and was submitted on January 18, 2008. The Supplemental Information Submittal Four was provided on January 18, 2008, and included a list of potential additional non-FFCA Sites for inclusion on the Individual Permit and a facility map. The Final Supplemental Information Submittal completed the permit application material by providing Form 2F information for all 411 Sites (including FFCA and non-FFCA Sites) proposed for inclusion on the Individual Permit, and is intended to replace the previous supplemental information submittals.

The Final Supplemental Information Submittal submission included descriptions and maps of 229 SMAs proposed for monitoring the 411 Sites recommended for inclusion on the individual permit. Individual documentation folders for each Site included site descriptions, updated erosion matrix scores, and current site photographs. Documentation for FFCA and non-FFCA Sites not proposed for inclusion on the individual permit was submitted on March 4, 2008 for the administrative record.

**TABLE 1 – 2008 Q1 WATERSHED-SCALE MONITORING STATUS**

Station	Station Name	Q1 Monitoring Samples <sup>a</sup>		Comment
		Analytical	Visual	
E026	Los Alamos below Ice Rink	—	—	
E026.85	Los Alamos below Omega West	1	1	Snow melt runoff grab sample.
E030	Los Alamos above DP Canyon	1	1	Snow melt runoff grab sample.
E038	DP above TA-21	—	—	
E039	DP below Meadow at TA-21	—	—	
E040	DP above Los Alamos Canyon	1	1	Snow melt runoff grab sample.
E042	Los Alamos above SR-4	1	1	Snow melt runoff grab sample.
E050	Los Alamos below LA Weir	1	1	Snow melt runoff grab sample.
E055	Pueblo above Acid	1	1	Snow melt runoff grab sample.
E055.5	South Fork of Acid Canyon	—	—	
E056	Acid above Pueblo	1	1	Snow melt runoff grab sample.
E060	Pueblo above SR-502	1	1	Snow melt runoff grab sample.
E099	Guaje at SR 502	1	1	Snow melt runoff grab sample.
E110	Los Alamos Canyon near Otowi Bridge	1	1	Snow melt runoff grab sample.
E121	Sandia right fork at Power Plant	1	1	Snow melt runoff grab sample.
E122	Sandia left fork at Asphalt Plant	1	1	Snow melt runoff grab sample.
E123	Sandia below Wetlands	1	1	Snow melt runoff grab sample.
E124	Sandia above Firing Range	1	1	Snow melt runoff grab sample.
E125	Sandia above SR-4	1	1	Snow melt runoff grab sample.
E200	Mortandad below Effluent Canyon	—	—	
E201	Mortandad above Ten Site	1	1	Snow melt runoff grab sample.
E201.3	Ten Site below MDA C	—	—	
E201.5	Ten Site above Mortandad	—	—	
E202	Mortandad above Sediment Traps	1	1	Snow melt runoff grab sample.
E203	Mortandad below Sediment Traps	—	—	
E204	Mortandad at LANL Boundary	—	—	
E218	Canada del Buey near TA-46	—	—	
E225	Canada del Buey near MDA G	—	—	
E227	MDA G-13	—	—	
E230	Canada del Buey above SR-4	1	1	Snow melt runoff grab sample.
E240	Pajarito below SR-501	—	—	
E241	Pajarito above Starmers	—	—	
E242	Starmers above Pajarito	—	—	
E242.5	La Delfe above Pajarito	—	—	
E243	Pajarito above Twomile	1	1	Snow melt runoff grab sample.
E243.5	Twomile tributary at TA-3	—	—	

**TABLE 1 – 2008 Q1 WATERSHED-SCALE MONITORING STATUS, Cont'd**

Station	Station Name	Q1 Monitoring Samples <sup>a</sup>		Comment
		Analytical	Visual	
E244	Twomile above Pajarito	1	1	Snow melt runoff grab sample.
E245	Pajarito above TA-18	1	1	Snow melt runoff grab sample.
E245.5	Pajarito above Threemile	1	1	Snow melt runoff grab sample.
E246	Threemile above Pajarito	1	1	Snow melt runoff grab sample.
E247	MDA G-1	—	—	
E248.5	MDA G-6U	—	—	
E249	MDA G-5	—	—	
E250	Pajarito above SR-4	1	1	Snow melt runoff grab sample.
E252	Water above SR-501	—	—	
E252.5	Water above S Site Canyon	—	—	
E252.8	S Site Canyon above Water	—	—	
E253	Canon de Valle above SR-501	—	—	
E256	Canon de Valle below MDA P	—	—	
E257	Canon de Valle tributary at Burn Grounds	—	—	
E262	Canon de Valle above Water	—	—	
E262.5	Water below MDA AB	—	—	
E263	Water at SR-4	1	1	Snow melt runoff grab sample.
E264	Indio at SR-4	—	—	
E265	Water below SR-4	—	—	
E266	Potrillo at Lower Slobbovia	—	—	
E267	Potrillo above SR-4	1	1	Snow melt runoff grab sample.
E274	Ancho north fork below SR-4	—	—	
E275	Ancho below SR-4	1	1	Snow melt runoff grab sample.
E338	Chaquehui at TA-33	—	—	
E340	Chaquehui tributary at TA-33	1	1	Snow melt runoff grab sample.

<sup>a</sup> During Q1 samplers were disassembled to protect equipment from damage and breakage during the winter months.