Individual Permit Technical Meeting

Thursday, September 15, 2011 Northern New Mexico College



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	Agenda	
10:00 – 10:15	IntroductionsPlaintiffs, technical experts, LANL staff, others	Bruce MacAllister
10:15 – 10:40	What are the goals and objectives of this and future joint technical meetings? • Discussion	Denny Hjeresen
10:40 - 10:45	Agenda setting and attendees	Bruce MacAllister
10:45– 11:15	Baseline control measures Discussion 	Terrill Lemke
11:15 – 11:45	SDPPP • Monitoring • Corrective Actions • Discussion	Steve Veenis
11:45 – 12:00	Break	
12:00 – 12:20	Website Content Input and questions Communications between parties for technical input 	Jackie Little
12:20 – 12:30	 Next public meeting date after monsoon data analyzed: November 2011 Next technical meeting date after SDPPP issued: April 2012 	Bruce MacAllister
12:30 - 1:00	 Follow up technical discussions at posters 	

LANL Goals and Objectives

- Meet the legal requirements of the settlement agreement
- Demonstrate effective management of surface water entering and leaving site
 - Provide defense in depth to minimize off-site contamination
- Describe mechanism for plaintiffs experts to access data
- Maximize technical and financial resources on the implementation of permit requirements
- Communicate progress to a range of stakeholders
 - Accurate communication of risk and risk reduction



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Baseline Controls Overview



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Slide 4



Permit Requirements

The Permittees must implement baseline control measures to meet the following nonnumeric technology-based effluent limits as necessary to minimize pollutants in its storm water discharges.



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Permit Requirements

- 1. Erosion and Sediment Controls
- 2. Management of Run-on and Runoff
- 3. Employee Training
- 4. Unauthorized Discharges
- 5. Other Controls



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Permit Requirements

- Baseline control measures must be installed within 6 months of effective date of Permit (May 1, 2011).
- Baseline control measures will be certified within 30 days of completion or 30 days after the effective date of the Permit (December 1, 2011).



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Planning

Project Area Description

- All 250 SMAs reviewed
- Run-on sources
- Drainage patterns
- On-site erosion
- Representative sampling
- Existing FFCA controls
- Identification of controls



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Implementation

- Retained some existing FFCA controls
- 1814 controls certified by May 1



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Verification and Certification

- Completed SMAs verified and photographed by LANL personnel
- Independent DOE verification
- Certified by DOE and LANL
- Submitted to EPA



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Example Baseline Controls

Riprap Spillway

Compost Mulch and Seed

State T

Straw Wattle

Baseline and Beyond

- Planning for Corrective Actions
- Installation of "Augmented" Controls
 - After May 1, resources available to augment baseline controls
 - Improved longevity of some controls



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NPDES Storm Water Individual Permit SDPPP Implementation

Steve Veenis – Project Manager September 2011



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Pajarito Plateau Watershed







Individual Permit Implementation

- Site Discharge Pollution Prevention Plan SDPPP
- Confirmation sampling
- Corrective Action required if Target Action Levels (TAL) exceeded
- Rain event inspections
- Public Involvement



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Organized by Watershed

- Volume 1 Los Alamos/Pueblo with 64 SMAs
- Volume 2 Sandia/Mortandad with 64 SMAs
- Volume 3 Pajarito with 51 SMAs
- Volume 4 Water/Canon de Valle with 50 SMAs
- Volume 5 Ancho/Chaquehui with 21 SMAs



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SDPPP Organization Within Each Volume

- Sections 100 900: General Plan Requirements
- Section 1000: SMA-Specific Information
 - Area Description
 - Site Map
 - Potential Pollutant Sources
 - Control Measures
 - Monitoring
 - Corrective Action Status



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IP Monitoring

Sample collection and site inspections are triggered by precipitation threshold exceedances of 1/4 inch within 30 minutes in respective theissen polygons



Vol 1: LOS ALAMOS | PUEBLO WATERSHED Las Alarnos National Laboratory, NPDES Permit No. NM0020 EP-DIR-PLAN-10005, R.0 April 18, 2011



Monitoring: Site Monitoring Areas (SMA)





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Operated by Los Alamos National Security, LLC for the U.S. Department of Energy's NNSA Slide 19

Conceptual Map Example

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SMA Monitoring Location - Automated





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SMA Monitoring Location – Single Stage





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FFCA Monitoring 2004-2009

Site-Specific Monitoring

- Metals, Radioactivity, Organics, SSC
- 147 SMA locations sampled
- Hundreds of samples collected
- Samples > comparison value
- Al, Cu, Zn, Gross Alpha, PCB Aroclor



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IP Monitoring

Summary of 2011 sample collection as of September 12

Watersheds	SMAs Sampled	Number of Samples
 Los Alamos/Pueblo 	19	24
•Sandia/Mortandad	15	22
•Pajarito	17	21
•Water/Canyon de Valle	19	21
 Ancho/Chaquehui 	2	3
Total	72	91

1st 2011 sample collected 7/24/11
28% of SMAs sampled
2 samples collected @ 19 SMAs
Validated data will be available on RACER



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Corrective Action Management Planning

SMA Binning – 2 Step Process

- High Priority SMAs 3 year schedule
 Moderate Priority SMAs 5 year schedule
- 2. Technical Feasibility (Enhanced or Design)
 - Project Planning
 - Project Definition
 - Design or Specifications
 - Procure/Build
 - Inspection/Hand off



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FY 11 Planning & Implementation





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Flow Dissipation

- Rock Check Dams
- Surface Roughening
- Water Bars
- Weirs







Run-on Diversion





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Run-on Diversion & Sediment Retention



The combination of earthen and asphalt berms installed to direct channel run-on to the west and sheet flow to the east of the site. The combination of hydroseed, erosion control blankets, and angular rock have helped stabilize the berms and bare areas adjacent to the SMA.



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Sediment Retention – Earthen Berms







Sediment Retention – Grade Control





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Sediment Control - Detention Basins





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Individual Permit Website: http://www.lanl.gov/environment/h2o/ip

Los Alamos	search Search	
EST. 1943	» or search scientific literature at the Research Library	
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MONITORIN	G, COMPLIANCE, AND RISK REDUCTION	
Environment	Environment » Water » Storm Water ? Questions »	
ir		
Biological Resources	NPDES Storm Water Individual Permit	
lean-up	Channe Michaele di Giuel Denneit - NDDEC Denneit Ma. NM0020750	
compliance &	Stoffi Water Individual Perfilt - NEDES Perfilt No. NM0050759	
Nonitoring	General Information Permit Site Discharge Pollution Prevention Plan Maps Regulatory Documents	
Cultural Resources		
nvironmental Risk	The U.S. Environmental Protection Agency (EPA), Region 6, issued the National Pollutant Discharge Ellimination System (NPDES)	
Reduction	Individual Permit - NPDES No. NM0030759 (Permit or IP) on September 30, 2010 to Los Alamos National Security, LLC (LANS) and	
ire	the U.S. Department of Energy (DOE) (the Permittees). The Individual Permit authorizes the discharge of storm water associated	
Vaste	with moustrial activities at the Los Alamos National Laboratory (LANL) from specified solid volaste Management ontis (SVMIOS) and Areas of Concern (AOCS) collectively referred to as Sites. The Individual Permit incorporating the latest modifications, became	
Vater	effective on November 1, 2010.	
)rinking Water	The Permit uses non-numeric technology-based effluent limitations, coupled with a comprehensive monitoring program, to minimize	
	pollutants in LANL's storm water discharges. LANL is required to implement site-specific control measures to address the non-	
Broundwater	numeric technology-based effluent limits. EPA believes compliance with these technology-based effluent limitations and with other terms and conditions of the Permit will control discharges as necessary to meet the applicable water quality standards. As used in	
Ionitoring	the Individual Permit, "minimize" means to reduce and/or eliminate discharges of pollutants in storm water to the extent achievable	
Permits	using site-specific control measures (including best management practices) that reflect best industry practice considering their	
Regulations	technological availability, economic achievability and practicability.	
Reports	Register to Receive Updates	
Surface Water	Email notifications will provide notice of completion of installation of baseline control measures, updates on Permit compliance, any	
Gurface Water	Email notifications will provide notice of completion of installation of baseline control measures, updates on Permit compliance, any requests for time extensions, spill information, and notification of any modification to the Permit or Site Discharge Pollution Prevention Plan (CDDPD) including charging Site Mentioning for any conditions is provided adding charging and state in the prevention of the permit of the prevention of the permit of the	
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