

**Environmental Programs**

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29-11-12 P01:23 RCVD

**National Nuclear Security Administration**

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29-11-12 P01:23 RCVD

Date: **NOV 29 2012**

Refer To: EP2012-0284

William K. Honker, Division Director
 Water Quality Protection Division (6WQ)
 U. S. Environmental Protection Agency, Region 6
 1445 Ross Avenue, Suite 1200
 Dallas, TX 75202-2733

Subject: NPDES Permit No. NM0030759--Submittal of the Revised Solid Waste Management Unit and Area of Concern Boundaries

Dear Mr. Honker:

Representatives from the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Co-Permittees for National Pollutant Discharge Elimination System (NPDES) Permit No. NM0030759 (the Individual Permit), met with Diana McDonald, Isaac Chen, and Renee Ryland on October 29 and 30, 2012, to update the U.S. Environmental Protection Agency (EPA) on the status of Individual Permit implementation activities. One topic of discussion was the recent update of the Potential Release Site (PRS) Database for Los Alamos National Laboratory (the Laboratory) and its effect on five solid waste management unit (SWMU) and area of concern (AOC) boundaries under the Individual Permit. Ms. McDonald asked that the Laboratory document these modified boundaries in a separate submittal as well as in the next applicable Site Discharge Pollution Prevention Plan (SDPPP).

Background

The Individual Permit authorizes discharges of stormwater associated with industrial activities from specified SWMUs and AOCs, collectively referred to as "Sites." The list of SWMUs and AOCs regulated under the Individual Permit is a subset of the SWMUs and AOCs that are included in the March 2005 Compliance Order on Consent (Consent Order), issued by the New Mexico Environment Department (NMED). The Consent Order fulfills the Resource Conservation and Recovery Act (RCRA) corrective action requirements for the Laboratory.

The SWMUs and AOCs at the Laboratory were originally identified in the November 1990 Solid Waste Management Units Report, which was prepared as the first step in the RCRA corrective action process. Before the Consent Order was implemented, 541 sites were evaluated by EPA and found to require no further action (NFA), and an additional 191 were approved for NFA by NMED. All original corrective action sites, except for those approved for NFA, were later incorporated into the Consent Order and are tracked in the Laboratory's Hazardous Waste Facility Permit.

Descriptions and approximate boundaries of the sites are maintained in the Laboratory's PRS and Geographic Information System databases. This information is used to prepare reports under both the Consent Order and the Individual Permit as well as for facility purposes. LANS compared individual SWMU and AOC boundaries in the administrative records for the Consent Order and the Individual Permit as part of a recent database update. The boundaries for five sites [i.e., AOC 03-014(b2), AOC 03-014(c2), SWMU 03-052(f), SWMU 15-010(b), and SWMU 60-007(b)] were found to be different between the last submittal under the Individual Permit and the most recent Consent Order document. Because the identification of the SWMUs and AOCs included in the Individual Permit originated through the RCRA corrective action process, the Consent Order administrative record is the controlling authority for boundary definitions.

Amendment to Individual Permit Administrative Record

As discussed during the October 29, 2012, meeting, the boundary changes identified during the review of the database were minor and did not affect the site monitoring area (SMA) boundaries or sampler locations. The attached figures show the sites as depicted in the appropriate Consent Order document and the May 2012 SDPPP, Revision 1.

AOC 03-014(b2): Outfall Associated with Former Waste Water Treatment Plant

In the September 2011 Phase II Investigation Work Plan for Upper Sandia Canyon Aggregate Area, Revision 1, AOC 03-014(b2) is depicted as two areas near an approximate drainline (Figure 1). The AOC is part of SMA S-SMA-3.53 and is depicted in the SDPPP as two discrete points at either end of the drainline (Figure 2).

AOC 03-014(c2): Outfall Associated with Former Waste Water Treatment Plant

In the September 2011 Phase II Investigation Work Plan for Upper Sandia Canyon Aggregate Area, Revision 1, AOC 03-014(c2) is depicted as swath trending northeast from Building 03-2209 (Figure 1). The AOC is part of SMA S-SMA-2.8 and is depicted in the SDPPP as two discrete points near a known drainline behind the same building (Figure 3).

SWMU 03-052(f): Outfall from Building 03-38

In the September 2011 Phase II Investigation Work Plan for Upper Sandia Canyon Aggregate Area, Revision 1, SWMU 03-052(f) is depicted as a west-east trending band downgradient of a storm drain (Figure 4). The SWMU is part of SMA S-SMA-0.25 and is depicted in the SDPPP as a point at the terminus of the drainpipe (Figure 5).

SWMU 15-010(b): Septic System

In the October 2011 Phase II Investigation Work Plan for Threemile Canyon Aggregate Area, Revision 1, SWMU 15-010(b) is depicted as small rectangle at the end of a sewer line (Figure 6). The SWMU is part of SMA 3M-SMA-0.2 and is depicted in the SDPPP as a small square in the same area (Figure 7).

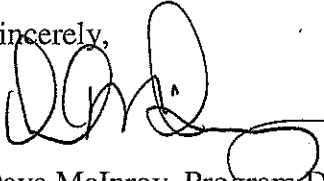
SWMU 60-007(b): Operational Release

In the September 2011 Phase II Investigation Work Plan for Upper Sandia Canyon Aggregate Area, Revision 1, SWMU 60-007(b) is depicted as two merging drainage ditches with a varying buffer area (Figure 8). The SWMU is part of SMA S-SMA-3.6 and is depicted in the SDPPP as the same two ditches with a fixed width (Figure 9).

As discussed at the October meeting, any additional changes will be referenced in the next applicable SDPPP.

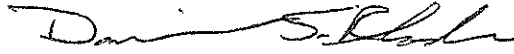
If you have any questions, please contact Steve Veenis at (505) 667-0013 (veenis@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@nnsa.doe.gov).

Sincerely,



Dave McInroy, Program Director
Environmental Programs –
Corrective Actions
Los Alamos National Laboratory

Sincerely,



David S. Rhodes, Supervisory Federal Project Director
Environmental Projects Office
Los Alamos Site Office

DM/DR/CD/SV:sm

Enclosures: One hard copy with electronic file – Figures showing Modified SWMU and AOC boundaries (LA-UR-12-26508)

Cy: (w/enc.)

Dave Cobrain, NMED, Santa Fe, NM
Public Reading Room, MS M992 (hard copy)
RPF, MS M707 (electronic copy)

Cy: (Letter and CD and/or DVD)

Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Wendy Staples, EP-BPS, MS M992

Cy: (w/o enc.)

Diana McDonald, USEPA Region 6 (6EN), Dallas, TX (date-stamped letter emailed)
Rich Mayer, USEPA Region 6 (6PD), Dallas, TX (date-stamped letter emailed)
Brent Larsen, USEPA Region 6 (6WQ), Dallas, TX (date-stamped letter emailed)
Richard Powell, NMED SWQB, Santa Fe, NM (date-stamped letter emailed)
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
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Dave McInroy, EP-CAP (date-stamped letter emailed)
Jeff Mousseau, ADEP (date-stamped letter emailed)