ESHID-600392 2014 Update to the Site Discharge Pollution Prevention Plan, Revision 1

Los Alamos National Laboratory NPDES Permit No. NM0030759 LA-UR-15-22150 • May 1, 2015

Water/Cañon de Valle Watershed

Receiving Waters: Cañon de Valle, Potrillo Canyon, Water Canyon, and Fence Canyon **Volume 4**

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CONTENTS

180.0	CDV-SMA-1.2: SWMUs 16-017(b)-99 and 16-029(k)	4
181.0	CDV-SMA-1.3: SWMUs 16-017(a)-99 and 16-026(m)	9
182.0	CDV-SMA-1.4: SWMUs 16-020, 16-026(I), 16-028(c), and 16-030(c)	15
183.0	CDV-SMA-1.45: SWMU 16-026(i)	22
184.0	CDV-SMA-1.7: SWMU 16-019	26
185.0	CDV-SMA-2: SWMU 16-021(c)	33
186.0	CDV-SMA-2.3: SWMUs 13-001, 13-002, 16-003(n), 16-003(o), 16-029(h), and 16-031(h)	40
187.0	CDV-SMA-2.41: SWMU 16-018	45
188.0	CDV-SMA-2.42: SWMU 16-010(b)	52
189.0	CDV-SMA-2.5: SWMUs 16-010(c), 16-010(d), and 16-028(a)	58
190.0	CDV-SMA-2.51: SWMU 16-010(i)	64
191.0	CDV-SMA-3: SWMU 14-009	70
192.0	CDV-SMA-4: SWMU 14-010	76
193.0	CDV-SMA-6.01: SWMU 14-006 and AOC 14-001(g)	79
194.0	CDV-SMA-6.02: SWMU 14-002(c), 14-002(d) and 14-002(e)	87
195.0	CDV-SMA-7: SWMU 15-008(d)	94
196.0	CDV-SMA-8: SWMU 15-011(c)	99
197.0	CDV-SMA-8.5: SWMU 15-014(a)	106
198.0	CDV-SMA-9.05: SWMU 15-007(b)	109
199.0	F-SMA-2: AOC 36-004(c)	112
200.0	PT-SMA-0.5: SWMU 15-009(e) and AOC C-15-004	120
201.0	PT-SMA-1: SWMUs 15-004(f) and 15-008(a)	128
202.0	PT-SMA-1.7: SWMU 15-006(a)	136
203.0	PT-SMA-2: SWMU 36-003(b) and AOCs 15-008(f) and 36-004(e)	143
204.0	PT-SMA-2.01: AOCs C-36-001 and C-36-006(e)	151
205.0	PT-SMA-3: SWMU 36-006 and AOC 36-004(a)	157
206.0	PT-SMA-4.2: SWMU 36-004(d)	165
207.0	W-SMA-1: SWMUs 16-017(j)-99, 16-026(v), and 16-026(c2)	172
208.0	W-SMA-1.5: SWMUs 16-026(b2) and 16-028(d)	179
209.0	W-SMA-2.05: SWMU 16-028(e)	185
210.0	W-SMA-3.5: SWMU 16-026(y)	190
211.0	W-SMA-4.1: SWMU 16-003(a)	193
212.0	W-SMA-5: SWMUs 16-001(e), 16-003(f), 16-026(b), 16-026(c), 16-026(d), and 16-026(e)	196
213.0	W-SMA-6: SWMU 11-001(c)	205
214.0	W-SMA-7: SWMU 16-029(e) and 16-026(h2)	208
215.0	W-SMA-7.8: SWMU 16-031(a)	214
216.0	W-SMA-7.9: SWMU 16-006(c)	217

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

217.0	W-SMA-8: SWMUs 16-016(g) and 16-028(b)	220
218.0	W-SMA-8.7: SWMUs 13-001, 13-002, 16-004(a), 16-026(j2), 16-029(h), and 16-035	227
219.0	W-SMA-8.71: SWMU 16-004(c)	235
220.0	W-SMA-9.05: AOC 16-030(g)	241
221.0	W-SMA-9.5: AOC 11-012(c)	246
222.0	W-SMA-9.7: SWMUs 11-011(a) and 11-011(b)	249
223.0	W-SMA-9.8: SWMU 11-005(c)	255
224.0	W-SMA-9.9: SWMU 11-006(b)	258
225.0	W-SMA-10: SWMUs 11-002, 11-005(a), 11-005(b), 11-006(c), 11-006(d), and 11-011(d)	
	and AOC 11-003(b)	
226.0	W-SMA-11.7: AOC 49-008(c)	271
227.0	W-SMA-12.05: SWMU 49-001(g)	277
228.0	W-SMA-14.1: SWMU 15-014(I) and AOC 15-004(h)	280
229.0	W-SMA-15.1: SWMU 49-005(a)	287

Attachments

Attachment 1	Amendments	292
Attachment 2	Vicinity Map	310
Attachment 3	Precipitation Network	311
Attachment 4	Physical Characteristics	320
Attachment 5	Sampling Requirements and Plan	323
Attachment 6	Additional Compliance Status Details for SMAs/Sites in Corrective Action	327

180.0 CDV-SMA-1.2: SWMUs 16-017(b)-99 and 16-029(k)

180.1 Site Descriptions

Two historical industrial activity areas are associated with V001, CDV-SMA-1.2: Sites 16-017(b)-99 and 16-029(k).

SWMU 16-017(b)-99 is a former HE machining building (former structure 16-93) that was located at TA-16. Constructed in 1950, the wooden building measured 20 ft wide × 60 ft long × 11 ft high and was surrounded by an earthen berm that was packed against steel pilings. The building was originally used for HE machining and later was used as an electroplating facility. By 1970, the building was used only for storage. Building 16-93 was removed in 1996.

Consent Order sampling has not yet been conducted at SWMU 16-017(b)-99; the Site will be sampled during the future Cañon de Valle Aggregate Area investigation. No investigations were conducted at the Site before the Consent Order went into effect in 2005.

SWMU 16-029(k) consists of two former HE sumps that served former electroplating building 16-93 at TA-16. Constructed in 1950, the 5-ft-wide × 15-ft-long × 5-ft-deep concrete sumps were situated on the northeast and southeast corners of the building. Two VCP drainlines extended north from each sump and eventually merged into a single drainline that continued for approximately 500 ft to an outfall located north of the K-Site Road. In the 1960s, the sumps were filled with gravel. The building, sumps, and drainlines were removed during D&D operations in 1996.

SWMU 16-029(k) along with numerous other SWMUs and AOCs is part of Consolidated Unit 16-008(a)-99, the former 90s Line, and was investigated and remediated under the Consent Order as a single Site. Consent Order investigations are complete for SWMU 16-029(k). The Site meets residential risk levels and was recommended for corrective action complete without controls. A request for COC without controls will be submitted to NMED.

The project map (Figure 180-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

180.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 180-1).

]	Purpose o	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00102040012	Established Vegetation	-	Х	Х	-	В
V00103020008	Base Course Berm	-	Х	-	Х	CB
V00103060009	Straw Wattle	Х	-	-	Х	В
V00103060010	Straw Wattle	Х	-	-	Х	В
V00103060011	Straw Wattle	Х	-	-	Х	В
V00104060001	Rip Rap	-	Х	Х	-	СВ
V00106010007	Rock Check Dam	-	Х	-	Х	СВ

Table 180-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

180.3 Storm Water Monitoring

SWMUs 16-017(b)-99 and 16-029(k) are monitored within CDV-SMA-1.2. Following the installation of baseline control measures, a baseline storm water sample was collected on September 12, 2013 (Figures 180-2 and 180-3). Analytical results from this sample yielded no TAL exceedances. Baseline confirmation is complete for CDV-SMA-1.2 and the associated SWMUs 16-017(b)-99 and 16-029(k) because all applicable sampling results are below the applicable MTAL or ATAL. No further sampling is required for CDV-SMA-1.2 for the duration of the IP.

180.4 Inspections and Maintenance

RG253 recorded two storm events at CDV-SMA-1.2 during the 2014 season. These rain events triggered two post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 180-2 Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40783	7-29-2014
Storm Rain Event	BMP-41339	8-11-2014
Annual Erosion Evaluation	COMP-43328	10-8-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 180-3Maintenance during 2014

Maintenance	Maintenance	Maintenance	Response	Response Discussion
Reference	Conducted	Date	Time	
BMP-37032	Added base course to berm V00103020008 to repair breach.	1-9-2014	111 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

180.5 Compliance Status

The Sites associated with CDV-SMA-1.2 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 180-4 Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-017(b)-99	Baseline Confirmation Complete	Baseline Monitoring Extended	Initiated 04-30-2012.
SWMU 16-029(k)	Baseline Confirmation Complete	Baseline Monitoring Extended	Initiated 04-30-2012.







Figure 180-2 Inorganic analytical results summary plot for CDV-SMA-1.2

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7



Figure 180-3 Organic analytical results summary plot for CDV-SMA-1.2

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

181.0 CDV-SMA-1.3: SWMUs 16-017(a)-99 and 16-026(m)

181.1 Site Descriptions

Two historical industrial activity areas are associated with V002, CDV-SMA-1.3: Sites 16-017(a)-99 and 16-026(m).

Site 16-017(a)-99 consists of a former HE machining building (structure 16-92) that was located at TA-16. Constructed in 1950, the wooden building measured 20 ft wide × 60 ft long × 11 ft high and was surrounded by an earthen berm that was packed against steel pilings. The building was originally used for HE machining and was later used to clean and refurbish HE-contaminated equipment. By 1970 the building was used entirely for storage. The building was removed in 1996. This Site was originally a component of SWMU 16-017, which consisted of a group of 24 structures within TA-16. During the 1999 Annual Unit Audit, SWMU 16-017 was split into 24 separate SWMUs to facilitate investigation. Structure 16-92 was given the individual SWMU identification of SWMU 16-017(a)-99 at that time.

SWMUs 16-017(a)-99 and 16-026(m) along with numerous other SWMUs and AOCs are part of Consolidated Unit 16-008(a)-99, the former 90s Line, and were investigated under the Consent Order as a single Site. The same surface sampling data set applies to both Sites.

Consent Order investigations are complete for SWMU 16-017(a)-99. The Site meets residential risk levels and was recommended for corrective action complete without controls in the approved investigation report. A request for COC without controls will be submitted to NMED.

SWMU 16-026(m) consists of two outfalls from two sumps [SWMU 16-029(I)], located near the 90s Line Pond area at TA-16, that served former HE machining building 16-92. The sumps were located on the east and west sides of building 16-92. The eastern sump discharged to a VCP drainline that extended north and west to its discharge point approximately 260 ft north of the building. The western sump discharged to a VCP that extended north and then west of the building where it discharged to an open drainage channel. Constructed in 1950, the building was used for machining HE until 1955. Subsequently, the building was used for cleaning and refurbishing HE-contaminated equipment. The sumps were filled with gravel during the mid-1960s, and by 1970 the building was devoted entirely to storage. The building, its sumps and drainlines were all removed in 1996. SWMUs 16-017(a)-99 and 16-026(m) along with numerous other SWMUs and AOCs are part of Consolidated Unit 16-008(a)-99, the former 90s Line, and were investigated under the Consent Order as a single Site. The same surface sampling data set applies to both Sites.

Consent Order investigations are complete for SWMU 16-026(m). The Site meets residential risk levels and was recommended for corrective action complete without controls in the approved investigation report. A request for COC without controls will be submitted to NMED.

The project map (Figure 181-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

181.2 Control Measures

There are no run-on contributions to this Permitted Feature and minimal runoff. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 181-1).

Table 181-1 Active Control Measures

			Purpose	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00202040003	Established Vegetation	-	Х	Х	-	В
V00203020002	Base Course Berm	-	Х	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

181.3 Storm Water Monitoring

SWMUs 16-017(a)-99 and 16-026(m) are monitored within CDV-SMA-1.3. Following the installation of baseline control measures, a baseline storm water sample was collected on September 13, 2013 (Figures 181-2 and 181-3). Analytical results from this sample yielded the following TAL exceedance:

• Gross-alpha activity of 34.7 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-017(a)-99:

• Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at the Site. Shallow (i.e., less than 3 ft bgs) 1996 VCA and 2006 Consent Order soil samples were not analyzed for gross-alpha radioactivity or alpha-emitting radionuclides because these constituents are not associated with historical Site activities.

SWMU 16-026(m):

• Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at the Site. Shallow (i.e., less than 3 ft bgs) 1996 VCA and 2006 Consent Order soil samples were not analyzed for gross-alpha radioactivity or alpha-emitting radionuclides because these constituents are not associated with historical Site activities.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 181-2 and 181-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 181-2 and 181-3.

Monitoring location CDV-SMA-1.3 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

• Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is between these values.

All the analytical results for these samples are reported in the 2013 Annual Report.

181.4 Inspections and Maintenance

RG253 recorded two storm events at CDV-SMA-1.3 during the 2014 season. These rain events triggered two post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 181-2	Control Measure	Inspections	during 2014
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Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40784	7-29-2014
Storm Rain Event	BMP-41340	8-11-2014
Annual Erosion Evaluation	COMP-43329	10-8-2014

No maintenance activities or facility modifications affecting discharge were conducted at CDV-SMA-1.3 in 2014.

181.5 Compliance Status

The Sites associated with CDV-SMA-1.3 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 181-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-017(a)-99	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013 Permit screening process for corrective action recommendation: COC recommended.
SWMU 16-026(m)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013 Permit screening process for corrective action recommendation: COC recommended.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.







Figure 181-1

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VOLUME 4: WATER/CAÑON DE VALLE WATERSHED



Figure 181-2 Inorganic analytical results summary plot for CDV-SMA-1.3

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Figure 181-3 Organic analytical results summary plot for CDV-SMA-1.3

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE VALLE WATERSHED**

182.0 CDV-SMA-1.4: SWMUs 16-020, 16-026(l), 16-028(c), and 16-030(c)

182.1 Site Descriptions

Four historical industrial activity areas are associated with V003, CDV-SMA-1.4: Sites 16-020, 16-026(I), 16-028(c), and 16-030(c).

SWMU 16-020 is a formerly permitted outfall (EPA 06A037) located 300 ft south of former building 16-222 in the northern portion of TA-16. From 1951 to 1979, the outfall received untreated effluent from the sink and floor drains in photoprocessing building 16-222 and discharged to a drainage channel that empties into Cañon de Valle. In 1979, a silver recovery unit was installed to treat the photoprocessing solutions before discharge. Discharges to the outfall ceased when building 16-222 was decommissioned in 1995. In 2000, approximately 200 yd³ of soil was removed from the outfall area as part of an IM. After soil removal, the outfall and a portion of the drainage channel were stabilized with rock pavements, check dams, and straw wattles. Building 16-222 underwent D&D in 2003. The outfall drainline is still in place.

Consent Order investigations have not yet begun for this Site; however, decision-level data are available from confirmation samples collected following the 2000 IM conducted at SWMU 16-020.

SWMU 16-026(I) consists of two former outfalls that were located on the east side of former x-ray building 16-220 in the northern portion of TA-16. Both outfalls received storm water discharges from separate roof drains. Engineering records state that neither the drainline nor the outfall could be located in the field. Building 16-220 underwent D&D in 2003.

Consent Order investigations have not yet begun for this Site; no decision-level data are available for SWMU 16-026(I).

SWMU 16-028(c) is a former NPDES-permitted outfall (04A070) and drainline that received discharges from eight floor drains in former building 16-220. Wastewater included noncontact cooling water, chiller condensate, periodic discharges from an HE vacuum pump, and wash water from cleaning building floors. The 6-in. VCP drainline discharged to an outfall located in a rocky ditch southeast of the building and flowed to a flat grassy field. The floor drains in former building 16-220 were plugged in 1991, and the outfall was removed from the Laboratory's NPDES permit on September 19, 1997. Building 16-220 underwent D&D in 2003. The outfall drainline is likely still in place.

Consent Order investigations have not yet begun for this Site; no decision-level data are available for SWMU 16-028(c).

SWMU 16-030(c) consists of three former outfalls from four roof drains at a former rest house (former structure 16-222) at TA-16. The 1990 SWMU report describes SWMU 16-030(c) as consisting of two outfalls originating from roof drains located on the northwest and northeast corners of building 16-222. Engineering drawings show that building 16-222 had four roof drains located at each roof corner that discharged to three outfalls. The roof drain on the northeast corner of the building discharged via a 6-in. VCP to an outfall located approximately 65 ft southeast of building 16-222. The northwest corner roof drain discharged via a 6-in. VCP to an outfall located approximately 20 ft west of building 16-222. The southeast and southwest corner roof drains were connected to a 6-in. VCP that discharged to an outfall located approximately 15 ft southwest of building 16-222. Building 16-222 was constructed in 1953 and underwent D&D in 2003. All surface and subsurface structures were removed in 2003.

Consent Order investigations were not conducted at SWMU 16-030(c). NMED issued a COC without controls for SWMU 16-030(c) in January 2008.

The project map (Figure 182-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

182.2 Control Measures

Rock check dams, berms, sediment basins, and existing vegetation throughout the area control run-on at this SMA. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 182-1).

Enhanced controls were installed and certified on May 30, 2014, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environmental-stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 182-1	Active Control Measures
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			Purpose	of Contro	ol	Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00302040069	Established Vegetation	-	х	х	-	В
V00303010066	Earthen Berm	Х	-	-	Х	В
V00303010070	Earthen Berm	Х	-	-	Х	EC
V00303010071	Earthen Berm	-	х	-	Х	EC
V00303010072	Earthen Berm	-	х	-	Х	EC
V00303020017	Base Course Berm	х	-	-	Х	СВ
V00303060077	Straw Wattle	х	-	-	Х	В
V00303060078	Straw Wattle	х	-	-	Х	В
V00303060079	Straw Wattle	х	-	-	Х	В
V00303060080	Straw Wattle	х	-	-	Х	В
V00303060081	Straw Wattle	Х	-	-	Х	В
V00305020068	Sediment Basin	х	-	-	Х	В
V00305020073	Sediment Basin	х	-	-	Х	EC
V00305020074	Sediment Basin	х	-	-	Х	EC
V00305020075	Sediment Basin	х	-	-	Х	EC
V00305020076	Sediment Basin	х	-	-	Х	EC
V00306010012	Rock Check Dam	-	х	-	Х	СВ
V00306010039	Rock Check Dam	-	х	-	Х	В
V00306010040	Rock Check Dam	-	х	-	Х	В
V00306010043	Rock Check Dam	х	-	-	Х	В
V00306010057	Rock Check Dam	х	-	-	Х	В
V00306010058	Rock Check Dam	-	х	-	Х	В
V00306010059	Rock Check Dam	-	Х	-	Х	В
V00306010060	Rock Check Dam	-	х	-	Х	В
V00306010061	Rock Check Dam	-	х	-	Х	В

		Purpose of Control		Control		
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00306010062	Rock Check Dam	-	х	-	Х	В
V00306010063	Rock Check Dam	-	х	-	Х	В
V00306010064	Rock Check Dam	-	х	-	Х	В
V00306010065	Rock Check Dam	Х	-	-	Х	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

182.3 Storm Water Monitoring

SWMUs 16-020, 16-026(I), 16-028(c), and 16-030(c) are monitored within CDV-SMA-1.4. Following the installation of baseline control measures, a baseline storm water sample was collected on September 10, 2012 (Figure 182-2). Analytical results from this sample yielded the following TAL exceedance:

• Silver concentration of 7.86 μ g/L (MTAL is 0.5 μ g/L).

In addition, weak acid dissociable cyanide analysis was not performed on the September 10, 2012, sample. The sample bottle preserved for cyanide was not received at the analytical laboratory, and the cyanide test was cancelled. Future storm water samples collected at CDV-SMA-1.4 will be analyzed for weak acid dissociable cyanide.

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-020:

• Silver is known to be associated industrial materials historically managed at the Site. Silver was detected above BVs in 20 of 20 shallow IM confirmation samples at a maximum concentration 720 times the soil BV.

SWMU 16-026(I):

 Silver is not known to be associated industrial materials historically managed at the Site. Decision-level data are not available for SWMU 16-026(I). However, a likely source of the cyanide TAL exceedance is SWMU 16-020, a former outfall located 300 ft south of former building 16-222 that received untreated effluent from the sink and floor drains in photoprocessing building 16-222 and discharged to a drainage channel that empties into Cañon de Valle. The SWMU 16-020 outfall is downstream of SWMU 16-026(I) and directly upstream of the SMA sampler.

SWMU 16-028(c):

 Silver is not known to be associated industrial materials historically managed at the Site. Decision-level data are not available for SWMU 16-028(c). However, a likely source of the cyanide TAL exceedance is SWMU 16-020, a former outfall located 300 ft south of former building 16-222 that received untreated effluent from the sink and floor drains in photoprocessing building 16-222 and discharged to a drainage channel empties into Cañon de Valle. The SWMU 16-020 outfall is downstream of SWMU 16-028(c) and directly upstream of the SMA sampler.

SWMU 16-030(c):

• Silver is not known to be associated industrial materials historically managed at the Site. Decision-level data are not available for SWMU 16-030(c).

The TAL exceedance was also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs.

Silver—The silver UTLs from developed urban landscape storm water run-on and from locations
with sediment derived from Bandelier Tuff were not calculated because the number of detected
values was not sufficient to allow calculation of a UTL value in the baseline metals concentration
study. Therefore, a comparison with background silver UTLs could not be made.

All of the analytical results for these samples are reported in the 2012 Annual Report.

182.4 Inspections and Maintenance

RG253 recorded two storm events at CDV-SMA-1.4 during the 2014 season. These rain events triggered two post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40785	7-29-2014
Storm Rain Event	BMP-41341	8-11-2014
Annual Erosion Evaluation	COMP-43330	10-8-2014

Table 182-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 182-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37310	Repaired west and east spillways by removing matting from damaged areas of sediment basin V00305020068. Added clean fill and compacted. Applied seed and TRM to repaired areas. Removed debris from spillway of earthen berm V00303010072.	4-1-2014	152 day(s)	Maintenance was initiated as a result of inspections conducted during winter weather conditions.
BMP-41337			60 day(s)	Maintenance delayed.

182.5 Compliance Status

The Sites associated with CDV-SMA-1.4 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-020	Corrective Action Initiated	Enhanced Control Corrective Action Monitoring	LANL, May 30, 2014, "Submittal of Certification of Installation of Enhanced Control Measures for Four Site Monitoring Areas (CDV-SMA-1.4, CHQ-SMA-1.03, Pratt-SMA-1.05, T-SMA-1)."
SWMU 16-026(I)	Corrective Action Initiated	Enhanced Control Corrective Action Monitoring	LANL, May 30, 2014, "Submittal of Certification of Installation of Enhanced Control Measures for Four Site Monitoring Areas (CDV-SMA-1.4, CHQ-SMA-1.03, Pratt-SMA-1.05, T-SMA-1)."
SWMU 16-028(c)	Corrective Action Initiated	Enhanced Control Corrective Action Monitoring	LANL, May 30, 2014, "Submittal of Certification of Installation of Enhanced Control Measures for Four Site Monitoring Areas (CDV-SMA-1.4, CHQ-SMA-1.03, Pratt-SMA-1.05, T-SMA-1)."
SWMU 16-030(c)	Corrective Action Complete	Corrective Action Complete	NMED, January 23, 2008, "Approval of Los Alamos National Laboratory Proposal for No Further Action."

Table 182-4Compliance Status during 2014









Figure 182-2 Inorganic analytical results summary plot for CDV-SMA-1.4

183.0 CDV-SMA-1.45: SWMU 16-026(i)

183.1 Site Descriptions

One historical industrial activity area is associated with V004, CDV-SMA-1.45: Site 16-026(i).

SWMU 16-026(i) consists of a former outfall and drainline from former x-ray building 16-224 at TA-16. Finished packaged HE components were x-rayed in building 16-224 and returned to adjacent resthouses for storage; in some cases, HE components were unwrapped before they were x-rayed. Reportedly, HE dust and small chips would periodically break off unpackaged components during the x-ray process and could have entered the floor drains. Floor drains in building 16-224 discharged to an outfall northeast of former building 16-224; the discharges consisted of small volumes of washdown water discharged onto a gradual, grass-covered slope. The floor drains in building 16-224 were plugged in 1991; building 16-224 underwent D&D in 2003.

Consent Order investigations have not yet begun; no decision-level data are available for SWMU 16-026(i).

The project map (Figure 183-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

183.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 183-1).

Enhanced controls were installed and certified on July 15, 2012, and submitted to EPA on July 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at

http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 183-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00402040005	Established Vegetation	-	Х	Х	-	В
V00403010004	Earthen Berm	-	Х	-	Х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

183.3 Storm Water Monitoring

SWMU 16-026(i) is monitored within CDV-SMA-1.45. Following the installation of baseline control measures, a baseline confirmation sample was collected on August 21, 2011 (Figure 183-2). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 17.8 pCi/L (ATAL is 15 pCi/L).

Exceedances are typically evaluated by comparing the results from soil samples collected at the Site during Consent Order investigations with the storm water TAL exceedances to determine whether the exceedance may be related to historical industrial activities.

SWMU 16-026(i):

• Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. No decision-level data are available for SWMU 16-026(i).

The TAL exceedance was also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 183-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 183-2.

Monitoring location CDV-SMA-1.45 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

 Gross alpha—The gross-alpha background UTL for locations with sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2012 gross-alpha result is below both of these values.

All the analytical results for these samples are reported in the 2012 Annual Report.

183.4 Inspections and Maintenance

RG253 recorded two storm events at CDV-SMA-1.45 during the 2014 season. These rain events triggered two post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40786	7-29-2014
Storm Rain Event	BMP-41342	8-11-2014
Annual Erosion Evaluation	COMP-43331	10-8-2014

Table 183-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at CDV-SMA-1.45 in 2014.

183.5 Compliance Status

The Site associated with CDV-SMA-1.45 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 183-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-026(i)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 07-18-2012.



24



Figure 183-2 Inorganic analytical results summary plot for CDV-SMA-1.45

184.0 CDV-SMA-1.7: SWMU 16-019

184.1 Site Descriptions

One historical industrial activity area is associated with V005, CDV-SMA-1.7: Site 16-019.

SWMU 16-019, MDA R, consists of the original World War II S-Site Burning Ground and associated inactive waste disposal site. Located at TA-16 north of building 16-260 and south of Cañon de Valle, the MDA was used to burn HE wastes and began operating in the mid-1940s. Initially, the HE wastes were burned directly on the ground surface in an area cleared of grass and shrubs. By 1949, burning operations were conducted in three adjacent shallow burn pits, each approximately 75 ft², constructed in the eastern portion of the MDA, approximately 150 ft from the edge of the canyon.

Burning operations at MDA R ceased in the early 1950s when the buildings comprising the 260-Line were constructed. During the construction of the 260-Line, the burn pits were backfilled with material from the associated berms and the entire area was leveled. In May 2000, the Cerro Grande fire burned over MDA R and continued to burn underground within the MDA for several weeks. As part of emergency response and fire suppression efforts, portions of the MDA were excavated and stabilized and erosion-control measures were installed. The area is currently covered with grasses, small trees, and shrubs.

Consent Order investigations have not yet begun for SWMU 16-019. Decision-level data are available from investigation sampling conducted during 1997, 1998, and 2000.

The project map (Figure 184-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

184.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 184-1).

			Purpose	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00501010004	Seed and Wood Mulch	-	х	х	-	СВ
V00502040016	Established Vegetation	-	х	х	-	В
V00503060024	Straw Wattle	-	х	-	Х	В
V00503060025	Straw Wattle	-	х	-	Х	В
V00504010018	Earthen Channel/Swale	Х	-	х	-	В
V00504040017	Culvert	Х	-	х	-	В
V00504060015	Rip Rap	-	-	х	-	СВ
V00504060026	Rip Rap	-	-	х	-	В
V00506010005	Rock Check Dam	-	х	-	Х	СВ
V00506010006	Rock Check Dam	-	х	-	Х	СВ
V00506010008	Rock Check Dam	Х	-	-	Х	СВ
V00506010009	Rock Check Dam	Х	-	-	Х	СВ
V00506010010	Rock Check Dam	Х	-	-	Х	СВ
V00506010011	Rock Check Dam	-	х	-	Х	СВ
V00506010012	Rock Check Dam	-	х	-	Х	СВ
V00506010013	Rock Check Dam	Х	-	-	Х	СВ
V00506010014	Rock Check Dam	Х	-	-	Х	СВ
V00506010019	Rock Check Dam	Х	-	-	Х	В
V00506010020	Rock Check Dam	Х	-	-	Х	В
V00506010021	Rock Check Dam	Х	-	-	Х	В
V00506010022	Rock Check Dam	Х	-	-	Х	В
V00506020023	Log Check Dam	-	х	-	Х	В

Table 184-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

184.3 Storm Water Monitoring

SWMU 16-019 is monitored within CDV-SMA-1.7. Following the installation of baseline control measures, a baseline storm water sample was collected on September 13, 2013 (Figures 184-2 and 184-3). Analytical results from this sample yielded the following TAL exceedances:

- Copper concentrations of 11 µg/L (MTAL is 4.3 µg/L),
- Cyanide, weak acid dissociable concentration of 0.0175 mg/L (MTAL is 0.01 mg/L),
- Gross-alpha activity of 36.9 pCi/L (ATAL is 15 pCi/L), and
- RDX concentration of 908 μ g/L (ATAL is 200 μ g/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-019:

- Copper is potentially associated with industrial materials historically managed at the Site. Copper was detected above BVs in 6 the 44 shallow (i.e., less than 3 ft bgs) 1998 and 2000 RFI soil samples collected at the Site at a maximum concentration 1563 times the soil BV.
- Cyanide is not known to be associated with industrial materials historically managed at the Site. None of the 44 shallow 1998 and 2000 RFI samples were analyzed for cyanide.
- RDX is known to be associated with industrial materials historically managed at the Site. RDX was detected in 16 of 44 shallow soil samples at a maximum concentration 2577% of the residential SSL.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at the Site. None of the 44 shallow 1998 and 2000 RFI samples were analyzed for alpha-emitting radionuclides.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 184-2 and 184-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 184-2 and 184-3.

Monitoring location CDV-SMA-1.7 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2013 is between these two values.
- Cyanide, weak acid dissociable—The cyanide, weak acid dissociable, UTL from undisturbed Bandelier Tuff storm water run-on was not calculated. The cyanide, weak acid dissociable, UTL from developed urban landscape background storm water is 0.004 mg/L. The cyanide, weak acid dissociable, result from 2013 is greater than the developed urban landscape value.
- Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is between these two values.
- RDX—The RDX UTL from undisturbed Bandelier Tuff and from developed urban landscape background storm water run-on were not calculated. Therefore, no comparison to RDX background values in storm water could be made.

All the analytical results for these samples are reported in the 2013 Annual Report.

184.4 Inspections and Maintenance

RG253 recorded two storm events at CDV-SMA-1.7 during the 2014 season. These rain events triggered one post-storm inspection. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 184-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Verification Inspection for Enhanced Controls	BMP-38572	5/29/2014
Storm Rain Event	BMP-40787	8-1-2014
Annual Erosion Evaluation	COMP-43332	10-17-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 184-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-42534	Installed 4 rock check dams directly downgradient of existing riprap V00504060015. Added angular rock to build up and extend check dam V00506010007. Installed straw wattles around the downgradient side of two mounds. Installed log check dam at bottom of existing drainage immediately downgradient of erosion feature. Cleaned and regraded existing channel/swale to ensure positive drainage to the west. Applied seed and TRM to swale.	9-17-2014	14 day(s)	Maintenance conducted as soon as practicable.
BMP-42924	Installed a new culvert and plugged existing culvert under the north end of 260 Loop Road. Applied hydromulch to all areas disturbed by maintenance activities.	9-17-2014	0 day(s)	Maintenance conducted as soon as practicable.

184.5 Compliance Status

The Site associated with CDV-SMA-1.7 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 184-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-019	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.







Figure 184-2 Inorganic analytical results summary plot for CDV-SMA-1.7



Figure 184-3 Organic analytical results summary plot for CDV-SMA-1.7

185.0 CDV-SMA-2: SWMU 16-021(c)

185.1 Site Descriptions

One historical industrial activity area is associated with V006, CDV-SMA-2: Site 16-021(c).

SWMU 16-021(c) consists of a formerly NPDES-permitted outfall (the 260 Outfall) for 13 HE sumps [SWMU 16-003(k)] that served HE machining building 16-260 at TA-16. Wastewater from the sumps flowed through a concrete trough to the outfall, located approximately 200 ft east of the building. Discharge from the outfall flowed to a settling pond that was approximately 50 ft long and 20 ft wide and that was located approximately 45 ft below the outfall. The drainage channel continued approximately 600 ft northeast from the outfall to the bottom of Cañon de Valle. A 15-ft near-vertical cliff is located approximately 400 ft from the outfall and marks the break between the upper and lower drainage channels. Building 16-260 was constructed in 1951 to process and machine HE. Wastewater from machining operations contained dissolved HE and entrained HE cuttings. Wastewater treatment consisted of routing the water to 13 settling sumps to recover entrained HE cuttings. In 1994, outfall discharge volumes were measured at several million gallons per year. The discharge volumes were likely higher during the 1950s when HE-production output from building 16-260 was substantially greater than it was in the 1990s. In the past, barium had been a constituent of certain HE formulations, and thus barium was also present in the outfall wastewater from building 16-260. Discharge to the outfall continued until 1996 when the sumps were plugged. The outfall was removed from the permit in January 1998.

During an IM conducted in 2000 and 2001, more than 1300 yd³ of contaminated soil was removed from the former settling pond and drainage channel. A low-permeability cap consisting of a 20-in.-thick crushed tuff/bentonite mixture was installed on top of the former settling pond during the IM. A CMI conducted in 2009 and 2010 included the removal of soil and tuff contaminated with HE and other constituents in the former 260 Outfall channel and in the alluvial systems of Cañon de Valle and Martin Spring Canyon, confirmation sampling, and installation of four HE treatment systems. Riskassessment results for the 260 Outfall drainage channel indicate the Site meets residential risk levels. Groundwater contamination continues to be assessed, monitored, and treated.

Consent Order soil investigations for the SWMU 16-021(c) drainage channel are complete. SWMU 16-021(c) is now being addressed under the Consent Order as part of the CME/ CMI for the 260 Outfall.

The project map (Figure 185-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

185.2 Control Measures

The run-on sources for this Permitted Feature are associated with structure 16-0260. The roof and paved area on the west side of the SMA contribute minimally to run-on at the SMA. This run-on is controlled by existing curbing. There is minimal run-on from the access road at the northeast corner of the SMA. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 185-1).

Table 185-1 Active Control Measures

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00602040013	Established Vegetation	-	Х	Х	-	В
V00603010006	Earthen Berm	-	Х	-	Х	СВ
V00603010007	Earthen Berm	Х	-	-	Х	СВ
V00603010008	Earthen Berm	Х	-	-	Х	СВ
V00603010009	Earthen Berm	Х	-	-	Х	СВ
V00603010010	Earthen Berm	Х	-	-	Х	СВ
V00603090001	Curbing	Х	-	-	Х	СВ
V00604060003	Rip Rap	-	Х	Х	-	СВ
V00606010002	Rock Check Dam	-	Х	-	Х	СВ
V00608020012	Rock Cap	-	х	х	-	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

185.3 Storm Water Monitoring

SWMU 16-021(c) is monitored within CDV-SMA-2. Following the installation of baseline control measures, a baseline storm water sample was collected on July 12, 2013 (Figures 185-2 and 185-3). Analytical results from this sample yielded the following TAL exceedance:

• Gross-alpha activity of 18.2 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-021(c):

• Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at the Site. None of the Consent Order soil samples were analyzed for alpha-emitting radionuclides.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 185-2 and 185-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 185-2 and 185-3. Monitoring location CDV-SMA-2 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

 Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is less than both of these values.

All the analytical results for these samples are reported in the 2013 Annual Report.

185.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-2 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38685	6-4-2014
Storm Rain Event	BMP-39822	7-18-2014
Storm Rain Event	BMP-40791	8-1-2014
Storm Rain Event	BMP-41774	8-18-2014
Annual Erosion Evaluation	COMP-43333	10-17-2014

Table 185-2 Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 185-3 Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37191	Repaired berms V00603010006, V00603010007, V00603010009, V00603010010 by removing rock and matting. Recompacted existing fill. Added clean fill and compacted. Applied nonwoven geotextile fabric and rock to spillway. Applied seed and matting to berm. Added gravel to fill in gully of rock cap V00608020012.	4-18-2014	168 day(s)	Maintenance was initiated as a result of inspections conducted during winter weather conditions.
BMP-38685	Removed wood mulch from rock check dam V00606010002 at inspection.	6-4-2014	0 day(s)	Maintenance conducted as soon as practicable.

185.5 Compliance Status

The Site associated with CDV-SMA-2 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 185-4 Compliance Status during 20)14	20	2	z i	ng	ri	du	IS C	atu	Sta	nce	lia	mp	Со	5-4	18	ble	Та
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Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-021(c)	Corrective Action Initiated	Corrective Action Initiated	Initiated 08-20-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.






Inorganic analytical results summary plot for CDV-SMA-2 **Figure 185-2**



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 185-3 Organic analytical results summary plot for CDV-SMA-2

39

186.0 CDV-SMA-2.3: SWMUs 13-001, 13-002, 16-003(n), 16-003(o), 16-029(h), and 16-031(h)

186.1 Site Descriptions

Six historical industrial activity areas are associated with V007, CDV-SMA-2.3: Sites 13-001, 13-002, 16-003(n), 16-003(o), 16-029(h), and 16-031(h).

SWMU 13-001 is an inactive firing site located east of former building 16-340. The firing site is associated with firing activities conducted at P-Site (former TA-13). The area contains shrapnel and debris, including firing cables, lead balls, and chunks of steel and copper.

Consent Order sampling is complete for SWMU 13-001. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for two detections of arsenic in two subsurface tuff samples. SWMU 13-001 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 13-001 will be eligible for a COC upon approval of the report by NMED.

SWMU 13-002 is an inactive surface disposal area located east of former building 16-340. The disposal area contains debris and shrapnel associated with firing activities conducted at P-Site (former TA-13). A portion of the TA-16 WWTP [Consolidated Unit 16-004(a)-99] is located above the southern tip of the surface disposal area.

Consent Order sampling is complete for SWMU 13-002. All detected inorganic and organic chemical concentrations from Consent Order samples were below residential SSLs. SWMU 13-002 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 13-002 will be eligible for a COC upon approval of the report by NMED.

SWMU 16-003(n) consists of a former sump that was located on the exterior northeast wall of former building 16-342 at TA-16. Installed in the early 1950s, the sump was constructed of reinforced concrete and measured approximately 3.5 ft wide × 6.5 ft long × 3 ft deep. The sump received effluent from building 16-342, an HE-processing building, and discharged to a former NPDES-permitted outfall (EPA 05A062) located in Fishladder Canyon, a tributary of Cañon de Valle. The outfall was removed from the Laboratory's NPDES permit effective July 31, 1996. Building 16-342, the sump, and drainlines were decommissioned in 1999 and underwent D&D in 2004 and 2005.

Consent Order sampling is complete for SWMU 16-003(n). SWMU 16-003(n) meets industrial risk levels. The Site was recommended for corrective action complete in the approved 2009 investigation report.

SWMU 16-003(o) consists of the six former HE sumps and an outfall associated with the former explosives synthesis building (structure 16-340) at TA-16. The sumps were connected to the former NPDES-permitted outfall via a 10-in. VCP, which originally discharged to a hill slope east of building 16-340. Building 16-340 was used to produce the plastics explosive PBX. VOCs were used in this preparation, but most VOCs were distilled during the processing. The remaining solvents historically were discharged with the wastewater to the sumps. In the late 1980s, a trough functioning as an air stripper was installed at the outfall and was designed to trap and volatilize residual solvents in the wastewater. The air stripper resembled a fish ladder, and it discharged approximately 250 ft east of the sumps into Fishladder Canyon, a tributary of Cañon de Valle. The outfall was removed from the Laboratory's NPDES permit on July 20, 1998. Building 16-340, the sumps, and drainlines were

decommissioned in 1999 and underwent D&D in 2004 and 2005, when all aboveground and subsurface structures and contaminated soil were removed. Approximately 100 yd³ of soil was removed from SWMU 16-003(o).

Consent Order sampling is complete for SWMU 16-003(o). SWMU 16-003(o) meets industrial risk levels. Alluvial wells downgradient of SWMU 16-003(o) continue to be monitored. The Site was recommended for corrective action complete in the approved 2009 investigation report.

SWMU 16-029(h) consists of an inactive outfall and two inactive/former drainlines (one known and one suspected) from the HE sump [AOC 16-003(p)], located on the south side of former building 16-478. The known drainline exits the southeast corner of the sump and extends 80 ft east of the sump to the rim of Cañon de Valle. This drainline discharged directly into Cañon de Valle before it was plugged in 1987. A second drainline is suspected to be present. The second drainline is reportedly a French drain that extends south of the sump. Former building 16-478 was used as a bunker, utility room, control room, and high-speed machining room for tests on experimental HE. When the building was removed in 2005, the sump was left in place. During the investigation activities conducted in 2009 and 2010, no evidence of the French drain was found.

Consent Order sampling is complete for SWMU 16-029(h). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for two detections of arsenic in two subsurface tuff samples. SWMU 16-029(h) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-029(h) will be eligible for a COC upon approval of the report by NMED.

SWMU 16-031(h) consists of a former NPDES-permitted outfall (EPA04A134) located approximately 300 ft northeast of former building 16-340. The outfall received discharges only from the sink and floor drain of a utility room (engineering drawing ENG-C-14851) within former structure 16-478. The outfall received discharges only from the former utility room. Structure 16-478 (formerly structure 13-4) was used for photographing explosives tests and was later modified for testing the effects of machining HE remotely. In July 1995, building 16-478 was decommissioned and subsequently underwent D&D in 2005.

Consent Order sampling is complete for SWMU 16-031(h). All detected inorganic and organic chemical concentrations from Consent Order samples were below residential SSLs. SWMU 16-031(h) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-031(h) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 186-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

186.2 Control Measures

The paved areas to the east of the SMA contribute some run-on; however, there is no run-on from the paved road. There is the potential of run-on to the SMA from a culvert discharging west of the area. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 186-1).

Table 186-1 Active Control Measures

			Purpose	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00702040021	Established Vegetation	-	Х	Х	-	В
V00703010027	Earthen Berm	-	Х	-	Х	В
V00703060023	Straw Wattle	-	Х	-	Х	В
V00703060028	Straw Wattle	-	Х	-	Х	В
V00703060029	Straw Wattle	Х	-	-	х	В
V00703120026	Rock Berm	-	Х	-	Х	В
V00706010019	Rock Check Dam	Х	-	-	Х	В
V00706010020	Rock Check Dam	Х	-	-	Х	В
V00706010024	Rock Check Dam	-	Х	-	Х	В
V00706010025	Rock Check Dam	-	Х	-	Х	В
V00707010002	Gabions	-	Х	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

186.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at CDV-SMA-2.3. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

186.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-2.3 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 186-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38686	6-3-2014
Storm Rain Event	BMP-39823	7-16-2014
Storm Rain Event	BMP-40792	7-28-2014
Storm Rain Event	BMP-41569	8-13-2014
Annual Erosion Evaluation	COMP-43334	10-9-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 186-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-38686	Straw wattle V00703060022 replaced at inspection.	6-3-2014	0 day(s)	Maintenance conducted as soon as practicable.
BMP-38953	Installed new rock check dam upgradient of existing check dam V00706010016 as a replacement. Installed new rock check dam in channel between check dam V00706010016 and sampler location.	6-25-2014	22 day(s)	Maintenance conducted as soon as practicable.
BMP-43512	Installed straw wattle on hillslope at location indicated on attached map. Repaired rill with native rock. Replaced wattle V00703060009 with an angular rock berm. Replaced wattle V00703060010 with an earthen berm.	10-24-2014	15 day(s)	Maintenance conducted as soon as practicable.

186.5 Compliance Status

The Sites associated with CDV-SMA-2.3 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 186-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 13-001	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment
SWMU 13-002	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment
SWMU 16-003(n)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment
SWMU 16-003(o)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment
SWMU 16-029(h)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment
SWMU 16-031(h)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

187.0 CDV-SMA-2.41: SWMU 16-018

187.1 Site Descriptions

One historical industrial activity area is associated with V008, CDV-SMA-2.41: Site 16-018.

SWMU 16-018 is the former location of MDA P, north of the TA-16 Burning Ground near the south rim of Cañon de Valle. MDA P operated from 1950 to 1984 as a disposal site for debris remaining from burning HE and HE-contaminated material at TA-16. Concrete and construction debris was deposited directly on the slopes leading down into the canyon. Other materials were burned at one of the nearby open-burn units, and the resulting debris or residue was pushed over the mesa rim into the canyon. The western area of MDA P primarily received construction debris from the demolition of World War II-era buildings; the eastern area received debris and residue from the open-burn units. MDA P underwent RCRA closure between 1999 and 2005. During closure, approximately 55,000 yd³ of soil, rock, metal, and concrete debris was excavated from MDA P. Of this quantity, 21,506 yd³ of soil was disposed of as hazardous waste. The remainder of this quantity consisted of industrial waste soils, concrete and metal debris that was recycled or managed as industrial waste, and rock that was decontaminated and then used as riprap within TA-16. Other excavated waste included 3947 lb of asbestos-containing material; 888 containers of unknown content; 95 miscellaneous metal objects; 3240 lb of LLW; 5389 lb of mixed waste; and various smaller quantities of HE, HE-contaminated debris, and residuals from treating HE. Scrap metal and concrete were shipped to recycling facilities. Contaminated soils and industrial wastes were shipped to off-site solid waste landfills. Solid, nonhazardous wastes were disposed of at MDA J.

Consent Order sampling has not been conducted at SWMU 16-018; however, decision-level data are available from confirmation samples collected during the RCRA closure of MDA P Site. The Site was segregated into zones (biological and exposed tuff) for cleanup and confirmation sampling purposes and a 30- × 30-ft sampling grid was placed over the entire Site.

The approved 2005 MDA P Site closure certification report concluded the nature and extent had been defined for chemicals and radionuclides detected at SWMU 16-018. The Site meets residential risk levels. NMED approved the SWMU 16-018 RCRA closure report in 2005. SWMU 16-018 was a formerly dual-regulated corrective action unit and was removed from the Laboratory's Hazardous Waste Facility Permit in 2010; therefore, this unit is no longer subject to the Consent Order.

The project map (Figure 187-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

187.2 Control Measures

The paved road south of the SMA does not contribute run-on. Run-on from the unpaved access road southwest of the area is controlled by the culvert and riprap located on the southwest SMA boundary. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 187-1).

Enhanced controls were installed and certified on June 27, 2014, as part of corrective action. Photographs of the enhanced controls are available at <u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php</u>.

Table 187-1 Active Control Measures

	-								
			Purpose	of ControlControlErosionSedimentControlX-B-XECX-ECX-CBX-CB					
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment				
V00802040015	Established Vegetation	-	Х	Х	-	В			
V00803010013	Earthen Berm	-	Х	-	Х	EC			
V00804010014	Earthen Channel/Swale	Х	-	Х	-	EC			
V00804040011	Culvert	Х	-	Х	-	СВ			
V00804060010	Rip Rap	Х	-	Х	-	СВ			
V00806010012	Rock Check Dam	-	Х	-	Х	EC			

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

187.3 Storm Water Monitoring

SWMU 16-018 is monitored within CDV-SMA-2.41. Following the installation of baseline control measures, a baseline confirmation sample was collected on August 21, 2011 (Figures 187-2 and 187-3). Analytical results from this baseline sample yielded the following TAL exceedances:

- Gross-alpha activity of 231 pCi/L (ATAL is 15 pCi/L) and
- PCB concentration of 24 ng/L (ATAL is 0.6 ng/L).

Following the installation of enhanced control measures at CDV-SMA-2.41, a corrective action storm water sample was collected on July 8, 2014 (Figures 187-2 and 187-3). Analytical results from this corrective action monitoring sample yielded the following TAL exceedances:

- Gross-alpha activity of 94.2 pCi/L (ATAL is 15 pCi/L) and
- PCB concentration of 25 ng/L (ATAL is 0.6 ng/L).

Exceedances are typically evaluated by comparing the results from soil samples collected at the Site during Consent Order investigations with the storm water TAL exceedances to determine whether the exceedance may be related to historical industrial activities.

SWMU 16-018:

- PCBs were potentially associated with industrial materials historically managed at SWMU 16-018. The PCB mixture (Aroclor-1260) was detected in 1 of 7 shallow soil confirmation samples collected at a concentration 2.8% of the residential SSL.
- Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Confirmation samples were not analyzed for gross-alpha radioactivity but were analyzed for gamma spectroscopy, which is capable of detecting americium-241 and uranium-235, and for uranium isotopes, which are alpha emitters. Alpha-emitting radionuclides were not detected above BVs or FVs in any of the confirmation samples collected at SWMU 16-018.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 187-2 and 187-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 187-2 and 187-3.

Monitoring location CDV-SMA-2.41 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals. PCBs are associated with building materials including paint, caulking, asphalt, solvents, transformers, and cutting oils.



CDV-SMA-2.41, Rip Rap, V00804060010 (photo ID 8793-4r)

- Gross alpha—The gross-alpha background UTL for locations with sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2011 gross-alpha result is between these two values.
- PCB—The PCB baseline storm water UTL for locations with sediment derived from Bandelier Tuff is 11.7 ng/L and baseline PCB UTL for run-on from a developed urban landscape is 98 ng/L. The 2011 PCB result is between these two values.

All the analytical results for these samples are reported in the 2011 and 2014 Annual Reports.

187.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-2.41 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 187-2	Control Measure	Inspections	during 2014
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Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38687	6-2-2014
Storm Rain Event	BMP-39824	7-16-2014
Storm Rain Event	BMP-40793	7-28-2014
Storm Rain Event	BMP-41570	8-13-2014
Annual Erosion Evaluation	COMP-43335	10-9-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 187-3	Maintenance during 2014
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Maintenance	Maintenance Conducted	Maintenance	Response	Response
Reference		Date	Time	Discussion
BMP-37033	Repaired matted area below rock check dam V00806010012 with fill and compact. Reapplied seed and matting over repair. Loosened soil between berm spurs to reduce compaction from heavy equipment. Applied seed and raked in lightly. Repaired gullies between east end of main berm and last berm spur. Added fill and compact. Applied seed and matting over repairs. Added angular rock to check dam V00806010012 to increase height. Added fill to all damaged berm spurs and compacted. Applied nonwoven geotextile fabric and TRM to spillways. Applied seed and TRM to berms. Added angular rock to upstream side of berm ends at cliff interface. Repaired damaged area on north side of main berm V00803010013. Added fill and compact. Reapplied seed and TRM over repair.	5-16-2014	238 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

187.5 Compliance Status

The Site associated with CDV-SMA-2.41 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 187-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-018	Corrective Action Initiated	Enhanced Control Corrective Action Monitoring	LANL, July 11, 2014, "Submittal of Certification of Installation of Enhanced Control Measures for Five Site Monitoring Areas (CDV-SMA-2.41, F-SMA-2, LA-SMA-5.51, PT-SMA-1.7, S-SMA-0.25)."





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

49



Bold font indicates result>TAL/MOL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 187-2 Inorganic analytical results summary plot for CDV-SMA-2.41

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VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

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Bold font indicates result>TAL/MOL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 187-3 Organic analytical results summary plot for CDV-SMA-2.41

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE VALLE WATERSHED**

188.0 CDV-SMA-2.42: SWMU 16-010(b)

188.1 Site Descriptions

One historical industrial activity area is associated with V008A, CDV-SMA-2.42: Site 16-010(b).

SWMU 16-010(b) consists of a former flash pad (structure 16-387) that was located at the TA-16 Burning Ground. The flash pad was enclosed within a 100- × 100-ft fenced area and consisted of a layer of sand several inches thick over a soil base. The pad was built in 1951 and was used to flash-burn solid and scrap HE, HE-contaminated equipment and debris, and HE-contaminated combustible material. Sands and residues from flash pad operations were disposed of at MDA P (SWMU 16-019). The flash pad operated as a hazardous waste treatment unit under RCRA interim status and underwent RCRA closure between 1999 and 2005. Closure activities included removing the flash pad and associated debris and removing soil and bedrock below and next to the former pad. The former flash pad and MDA P were closed and remediated together along with adjacent SWMUs, known as Consolidated Unit 16-016(c)-99; for cleanup and closure purposes, the Sites were referred to as MDA P Site. Confirmation samples were collected as part of the closure of MDA P Site and included SWMU 16-010(b). The Site Closure Certification Report was approved by NMED on November 10, 2005. SWMU 16-010(b) is a formerly dual-regulated corrective action unit and has been removed from the list of corrective action units in the Laboratory's Hazardous Waste Facility Permit; therefore, this unit is no longer subject to the Consent Order.

The project map (Figure 188-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

188.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 188-1).

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V008A02040020	Established Vegetation	-	Х	Х	-	В
V008A03010006	Earthen Berm	-	Х	-	Х	СВ
V008A03010016	Earthen Berm	-	Х	-	Х	СВ
V008A04060002	Rip Rap	-	Х	Х	-	СВ
V008A04060005	Rip Rap	-	Х	Х	-	СВ
V008A04060018	Rip Rap	Х	-	Х	-	В
V008A04060019	Rip Rap	-	Х	Х	-	В
V008A06010004	Rock Check Dam	-	Х	-	Х	СВ
V008A06010017	Rock Check Dam	Х	-	-	Х	В
V008A07010003	Gabions	-	Х	-	Х	СВ

Table 188-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

188.3 Storm Water Monitoring

SWMU 16-010(b) is monitored within CDV-SMA-2.42. Following the installation of baseline control measures, a baseline storm water sample was collected on July 12, 2013 (Figures 188-2 and 188-3). Analytical results from this sample yielded the following TAL exceedances:

- Copper concentrations of 4.37 μg/L (MTAL is 4.3 μg/L),
- Gross-alpha activity of 89.3 pCi/L (ATAL is 15 pCi/L), and
- PCB concentration of 33 ng/L (ATAL is 0.6 ng/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-010(b):

• Based on site history and RCRA closure confirmation sampling, the Site is unlikely a source of the TAL exceedances for copper, PCBs, and gross-alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 188-2 and 188-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 188-2 and 188-3.

Monitoring location CDV-SMA-2.42 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 μg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 μg/L. The copper result from 2013 is between these two values.
- Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is between these two values.
- PCBs—The PCB UTL from developed urban landscape storm water run-on is 98 ng/L; the PCB UTL for background storm water containing sediment derived from Bandelier Tuff is 11.7 ng/L. The PCB result from 2013 is between these values.

All the analytical results for these samples are reported in the 2013 Annual Report.

188.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-2.42 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 188-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38691	6-2-2014
Storm Rain Event	BMP-39828	7-16-2014
Storm Rain Event	BMP-40797	7-28-2014
Storm Rain Event	BMP-41574	8-13-2014
Annual Erosion Evaluation	COMP-43336	10-9-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 188-3Maintenance during 2014

Maintenance	Maintenance Conducted	Maintenance	Response	Response
Reference		Date	Time	Discussion
BMP-43812	Added angular rock to the minor rill on the downgradient side of berm V008A03010006.	10-24-2014	15 day(s)	Maintenance conducted as soon as practicable.

188.5 Compliance Status

The Site associated with CDV-SMA-2.42 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 188-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-010(b)	Corrective Action Initiated	Corrective Action Initiated	Initiated 08-26-2013 Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.







Figure 188-2 Inorganic analytical results summary plot for CDV-SMA-2.42

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 188-3 Organic analytical results summary plot for CDV-SMA-2.42

189.0 CDV-SMA-2.5: SWMUs 16-010(c), 16-010(d), and 16-028(a)

189.1 Site Descriptions

Three historical industrial activity areas are associated with V009, CDV-SMA-2.5: Sites 16-010(c), 16-010(d), and 16-028(a).

SWMU 16-010(c) is a former burn table that was converted to a flash pad/burn tray (structure 16-388) located at the TA-16 Burning Ground. The burn table was used to treat HE scrap. The 100- × 100-ft enclosed area consisted of a concrete pad that was used to unload explosives and a 16- × 4-ft metal tray that was approximately 2 ft above the ground surface. Scrap HE was placed on the tray and burned. The current flash pad consists of a 22- × 22-ft concrete pad set on a secondary containment area and surrounded on three sides by a concrete wall. Before treatment, the HE-contaminated wastes are placed on steel pallets or steel trays. Propane burners are used as heat sources to treat the wastes at the flash pad, which can be covered with a movable steel roof when the pad is not in use. The current burn tray consists of a stainless-steel kettle that is 30 in. in diameter and 24 in. high. Propane burners are used to treat HE-contaminated liquid wastes at the burn tray. The entire assembly, which can be covered with a retractable cover, is provided with secondary containment.

No investigations have been conducted at this Site. SWMU 16-010(c) is a formerly dual-regulated corrective action unit that was removed from the list of corrective action units in the Laboratory's Hazardous Waste Facility Permit in November 2010; therefore, this unit is no longer subject to the Consent Order.

SWMU 16-010(d) is a former burn table that was converted to a burn tray (structure 16-399) located at the TA-16 Burning Ground. The 100-ft² enclosed area consists of a concrete pad, a burn table that is approximately 2 ft above the ground surface, and a 16- \times 4-ft metal tray situated on the table. Scrap HE is placed on the tray and burned. A metal-covered rain guard can be rolled back to expose the tray.

No investigations have been conducted at this Site. SWMU 16-010(d) is a formerly dual-regulated corrective action unit that was removed from the list of corrective action units in the Laboratory's Hazardous Waste Facility Permit in November 2010; therefore, this unit is no longer subject to the Consent Order.

SWMU 16-028(a) is the south drainage channel located at the TA-16 Burning Ground. The drainage channel is located south of the Burning Ground road and east of a water treatment shed (structure 16-363). The drainage receives runoff from the entire Burning Ground and flows into a tributary of Cañon de Valle.

Consent Order investigations have not yet begun for this Site; however, decision-level data from 1995 and 1997 RFIs are available for SWMU 16-028(a). Several inorganic chemicals were detected above BVs in shallow RFI samples, and PAHs and HE were detected at concentrations below residential SSLs.

The project map (Figure 189-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

189.2 Control Measures

Multiple paved areas in and around this SMA have the potential to contribute to run-on to the SWMUs. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 189-1).

			Purpose	e of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V00902040036	Established Vegetation	-	х	х	-	В
V00903010011	Earthen Berm	-	х	-	х	СВ
V00903010043	Earthen Berm	Х	-	-	Х	В
V00903120034	Rock Berm	-	х	-	Х	В
V00903120035	Rock Berm	-	х	-	Х	В
V00903120038	Rock Berm	Х	-	-	Х	В
V00903120039	Rock Berm	Х	-	-	Х	В
V00903120040	Rock Berm	Х	-	-	Х	В
V00903120041	Rock Berm	Х	-	-	х	В
V00903120042	Rock Berm	-	х	-	Х	В
V00904060005	Rip Rap	Х	-	х	-	СВ
V00904060006	Rip Rap	-	Х	х	-	СВ
V00904060007	Rip Rap	Х	-	х	-	СВ
V00904060009	Rip Rap	Х	-	х	-	СВ
V00906010029	Rock Check Dam	Х	-	-	Х	В
V00906010030	Rock Check Dam	Х	-	-	Х	В
V00906010031	Rock Check Dam	Х	-	-	Х	В
V00906010033	Rock Check Dam	Х	-	-	Х	В
V00906010044	Rock Check Dam	Х	-	-	Х	В
V00906010045	Rock Check Dam	-	Х	-	Х	В
V00906010046	Rock Check Dam	-	Х	-	Х	В
V00906010047	Rock Check Dam	Х	-	-	х	В
V00906010048	Rock Check Dam	Х	-	-	х	В
V00906010049	Rock Check Dam	-	х	-	Х	В
V00906010050	Rock Check Dam	-	х	-	Х	В

Table 189-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

189.3 Storm Water Monitoring

SWMUs 16-010(c), 16-010(d), and 16-028(a) are monitored within CDV-SMA-2.5. Following the installation of baseline control measures, baseline confirmation samples were collected on September 1, 2011, October 12, 2012, and July 26, 2013 (Figures 189-2 and 189-3). Inorganic and organic analytical results from these baseline samples yielded no TAL exceedances. Baseline confirmation is complete for CDV-SMA-2.5 and the associated SWMUs 16-010(c), 16-010(d), and 16-028(a) because all applicable sampling results are below the applicable MTAL or ATAL. No further sampling is required for CDV-SMA-2.5 for the duration of the IP.

189.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-2.5 during the 2014 season. These rain events triggered five post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38688	6-2-2014
Storm Rain Event	BMP-39825	7-17-2014
Storm Rain Event	BMP-40794	7-31-2014
Storm Rain Event	BMP-41571	8-1-2014
Storm Rain Event	BMP-41777	8-13-2014
Annual Erosion Evaluation	COMP-43337	10-9-2014

Table 189-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 189-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-38979	Installed new rock check dam upgradient of the fence enclosure. Rehabilitated access route by raking and seeding.	6-25-2014	23 day(s)	Maintenance conducted as soon as practicable.
BMP-41657	Removed wood mulch from earthen berm V00903010011 and placed out of flow path.	8-14-2014	13 day(s)	Maintenance conducted as soon as practicable.
BMP-43513	Installed a rock berm on outside southeast corner of fence surrounding 16-010(d). Installed 2 rock check dams in small channel downgradient of new rock berm.	10-21-2014	12 day(s)	Maintenance conducted as soon as practicable.

189.5 Compliance Status

The Sites associated with CDV-SMA-2.5 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 189-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-010(c)	Baseline Confirmation Complete	Baseline Confirmation Complete	No Comment
SWMU 16-010(d)	Baseline Confirmation Complete	Baseline Confirmation Complete	No Comment
SWMU 16-028(a)	Baseline Confirmation Complete	Baseline Confirmation Complete	No Comment





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE

VALLE WATERSHED

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std used in ratio calculations	MTAL	ATAL	ATAL	ATAL	MQL	MTAL	ATAL	MTAL	MTAL	ATAL	MTAL	ATAL	MQL	ATAL	ATAL	MTAL	MQL	ATAL	ATAL
and the later	750	640	9	5000	1	210	1000	4.3	17	0.77	170	5	0.5	6.3	100	42	0.01	15	30
std value	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	mg/L	pCi/L	pCi/L
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unit 7/26/2013 result result / TAL	-	-	-	-	-	-	-	- 2.15 0.5 1.9	L	- 0.103 0.13 0.066	- 1.04 0.0061 1	- 5 1 1.5		- 2 0.32 0.45		- 18.6 0.44 3.9	- 0.005 0.5 0.008	- 12.5 0.83 10.3	-

Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 189-2 Inorganic analytical results summary plot for CDV-SMA-2.5

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE VALLE WATERSHED**

100.00 SMA: CDV-SMA-2.5 baseline, 9/1/2011 Exceedance Ratio (Result / TAL) 10.00 baseline, 10/12/2012 baseline, 7/26/2013 - GeoMean/ATAL \diamond 1.00 \diamond \diamond \diamond \diamond 0.10 \diamond ŧ ٠ 8 0.01 Trinitrotoluene [2,4,6-] DDD[4,4'-] DDE[4,4'-] Aldrin DDT[4,4'-] Endrin Heptachlor Hexachlorobenzene RDX Benzo(a)pyrene Chlordane (alpha/gamma) Dieldrin Endosulfan II Heptachlor Epoxide dioxin[2,3,7,8-] Total PCB Toxaphene BHC[gamma-] Chlordane[alpha-] Chlordane[gamma-] Tetrachlorodibenzo (Technical Grade) Pentachlorophenol Endosulfan std used in ratio calculations MQL _ _ MQL MTAL ATAL -_ ATAL std value -5 -----5 19 200 ---20 --ug/L ug/L unit ug/L 7/26/2013 result 1.19 11.9 11.9 -----------result / TAL 0.24 2.4 0.63 . 10/12/2012 resu 0.281 ------------3.4 -result / TAL 0.014 0.017 _ 9/1/2011 result 0.3 3 3 5.79 0.336 ----------------result / TAL 0.06 0.6 0.16 0.029 0.017 _

Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 189-3 Organic analytical results summary plot for CDV-SMA-2.5

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

190.0 CDV-SMA-2.51: SWMU 16-010(i)

190.1 Site Descriptions

One historical industrial activity area is associated with V009A, CDV-SMA-2.51: Site 16-010(i).

SWMU 16-010(i) is structure 16-392, an inactive burn pad that previously was a filter bed that received wash water from the basket-wash facility. The wash water was received through a trough (structure 16-1136). Filtered wash water from the basket-wash facility collected within perforated piping along the bottom of the filter bed and drained via gravity through a pipe to an adjacent outfall southeast of the filter bed. The filter bed was modified to a burn pad to burn suspected uranium-contaminated objects. The basket-wash facility and discharge trough were removed in 2003; the filter bed is still in place. SWMU 16-010(i), along with numerous other SWMUs and AOCs, is a component of Consolidated Unit 16-010(h)-99, the Burning Ground structures.

Consent Order sampling has not been conducted at SWMU 16-010(i); however, decision-level data are available from soil samples collected under the 1995 RFI.

The project map (Figure 190-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

190.2 Control Measures

The paved access road east of the SMA has the potential to contribute to run-on onto the Site. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 190-1).

		Purpose of Control					
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status	
V009A02040029	Established Vegetation	-	Х	Х	-	В	
V009A03020005	Base Course Berm	Х	-	-	Х	СВ	
V009A03020012	Base Course Berm	Х	-	-	Х	СВ	
V009A03060030	Straw Wattle	Х	-	-	Х	В	
V009A03060031	Straw Wattle	Х	-	-	Х	В	
V009A06010003	Rock Check Dam	-	Х	-	Х	СВ	
V009A06010004	Rock Check Dam	-	Х	-	Х	СВ	
V009A06010006	Rock Check Dam	Х	-	-	Х	СВ	
V009A06010013	Rock Check Dam	-	Х	-	Х	СВ	
V009A06010014	Rock Check Dam	-	Х	-	Х	СВ	
V009A06010015	Rock Check Dam	-	Х	-	Х	СВ	
V009A06010016	Rock Check Dam	Х	-	-	Х	СВ	
V009A06030017	Juniper Bales	Х	-	-	Х	СВ	

Table 190-1 Active Control Measures

CB: Certified baseline control measure.

EC: Enhanced control measure.

B: Additional baseline control measure.

190.3 Storm Water Monitoring

SWMU 16-010(i) is monitored within CDV-SMA-2.51. Following the installation of baseline control measures, a baseline storm water sample was collected on September 13, 2013 (Figures 190-2 and 190-3). Analytical results from this sample yielded the following TAL exceedance:

• Gross-alpha activity of 16.4 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-010(i):

 Alpha-emitting radionuclides are known to be associated with industrial materials historically managed at the Site. Shallow (i.e., less than 3 ft bgs) 1995 RFI samples collected at the Site were not analyzed for gross-alpha radioactivity or alpha-emitting radionuclides. However, samples were analyzed for total uranium, which has alpha-emitting isotopes. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 190-2 and 190-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 190-2 and 190-3.

Monitoring location CDV-SMA-2.51 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

• Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is less than both these values.

All the analytical results for these samples are reported in the 2013 Annual Report.

190.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-2.51 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 190-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38692	6-2-2014
Storm Rain Event	BMP-39829	7-16-2014
Storm Rain Event	BMP-40798	7-28-2014
Storm Rain Event	BMP-41575	8-13-2014
Annual Erosion Evaluation	COMP-43338	10-9-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 190-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-38692	Removed needle cast from rock check dam V009A06010015 during inspection.	6-2-2014	0 day(s)	Maintenance conducted as soon as practicable.
BMP-38940	Modified or repaired rock check dams V009A06010003, V009A06010006, and V009A06010014 by adding angular native rock to build up height and extend both ends.	6-16-2014	14 day(s)	Maintenance conducted as soon as practicable.

190.5 Compliance Status

The Site associated with CDV-SMA-2.51 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 190-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-010(i)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.







Inorganic analytical results summary plot for CDV-SMA-2.51 **Figure 190-2**

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE**



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 190-3 Organic analytical results summary plot for CDV-SMA-2.51

191.0 CDV-SMA-3: SWMU 14-009

191.1 Site Descriptions

One historical industrial activity area is associated with V010, CDV-SMA-3: Site 14-009.

SWMU 14-009 is a surface disposal area located south and west of building 14-43 at TA-14. The disposal area measures approximately 30×140 ft and consists of sand and ruptured sandbags used during explosives tests performed at nearby firing sites [SWMUs 14-002(a) and 14-002(b)].

Phase I Consent Order investigation is complete for SWMU 14-009, and the Site is expected to be eligible for a COC under the Consent Order after submittal and approval of the supplemental investigation report for Cañon de Valle Aggregate Area, TA-14.

The project map (Figure 191-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

191.2 Control Measures

The primary source of run-on for this Permitted Feature originates on the paved areas to the north and west of the SMA. Additional run-on from roof drains on building 14-0043 also impacts the SMA via the same flow patterns. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 191-1).

Enhanced controls were installed and certified on July 18, 2012, and submitted to EPA on July 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at

http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01001010012	Seed and Wood Mulch	-	-	х	-	EC
V01002040013	Established Vegetation	-	х	Х	-	В
V01003010010	Earthen Berm	-	х	-	Х	EC
V01003010011	Earthen Berm	-	х	-	Х	EC
V01003120005	Rock Berm	Х	-	-	Х	СВ
V01003120009	Rock Berm	-	х	-	Х	СВ
V01004060007	Rip Rap	Х	-	Х	-	СВ
V01006010004	Rock Check Dam	-	х	-	Х	СВ

Table 191-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

191.3 Storm Water Monitoring

SWMU 14-009 is monitored within CDV-SMA-3. Following the installation of baseline control measures, a baseline confirmation sample was collected on August 21, 2011 (Figure 191-2 and 191-3). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 33.4 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 14-009:

 Alpha-emitting radionuclides are known to be associated industrial materials historically managed at the Site. Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed using gamma spectroscopy, which is capable of detecting americium-241 and uranium-235, and for uranium isotopes, all of which are alphaemitting radionuclides. Alphaemitting radionuclides managed by



the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

The TAL exceedance was also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 191-2 and 191-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 191-2 and 191-3.

Monitoring location CDV-SMA-3 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

• Gross alpha—The gross-alpha background UTL for locations with sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2011 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2011 Annual Report.

191.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-3 during the 2014 season. These rain events triggered three post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38689	5-30-2014
Storm Rain Event	BMP-39826	7-21-2014
Storm Rain Event	BMP-41572	8-13-2014
Annual Erosion Evaluation	COMP-43287	10-8-2014

Table 191-2 Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at CDV-SMA-3 in 2014.

191.5 Compliance Status

The Site associated with CDV-SMA-3 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 191-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 14-009	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 07-18-2012.




73



Figure 191-2 Inorganic analytical results summary plot for CDV-SMA-3

74



Figure 191-3 Organic analytical results summary plot for CDV-SMA-3

EP2015-0051

192.0 CDV-SMA-4: SWMU 14-010

192.1 Site Descriptions

One historical industrial activity area is associated with V011, CDV-SMA-4: Site 14-010.

SWMU 14-010 is a former HE sump that was located on the exterior south wall of a former firing chamber [structure 14-2, SWMU 14-002(a)]. The sump received wastewater from a floor drain in firing chamber 14-2 and discharged to an outfall located approximately 24 ft southeast of the sump. In 1973, contaminated portions of structure 14-2 were removed and disposed of at TA-54; the rest of the building was demolished and burned, and the sump and most of the drainline were removed. During the 1997 VCA conducted at the Site, contaminated surface soil and sediment in the drainage area below the former outfall were excavated and removed.

Phase I Consent Order sampling is complete for SWMU 14-010. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs. SWMU 14-010 will be recommended for corrective action complete in the supplemental investigation report for Cañon de Valle Aggregate Area, TA-14, to be submitted to NMED in 2015. SWMU 14-010 will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 192-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

192.2 Control Measures

There is run-on to the SWMU from the paved area above the SMA. Existing controls address this potential run-on source. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 192-1).

Table 192-1 Active Control Measures

			Purpose o	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01103010008	Earthen Berm	-	Х	-	х	В
V01104060007	Rip Rap	Х	-	Х	-	В
V01106010009	Rock Check Dam	-	Х	-	Х	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

192.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at CDV-SMA-4. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

192.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-4 during the 2014 season. These rain events triggered three post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38690	5-30-2014
Storm Rain Event	BMP-39827	7-21-2014
Storm Rain Event	BMP-41573	8-13-2014
Annual Erosion Evaluation	COMP-43288	10-8-2014

Table 192-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at CDV-SMA-4 in 2014.

192.5 Compliance Status

The Site associated with CDV-SMA-4 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 192-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 14-010	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





VOLUME 4: WATER/CAÑON DE VALLE WATERSHED



193.0 CDV-SMA-6.01: SWMU 14-006 and AOC 14-001(g)

193.1 Site Descriptions

Two historical industrial activity areas are associated with V012, CDV-SMA-6.01: Sites 14-006 and 14-001(g).

SWMU 14-006 is a decommissioned HE sump (structure 14-31), associated drainline, and outfall located at TA-14 approximately 45 ft east of control building 14-23. Installed in 1952, the steel-lined sump is constructed of reinforced concrete and measures approximately 4.5 ft wide × 8 ft long × 5 ft deep. The sump received discharges from sink and floor drains in building 14-23 and discharged to an outfall approximately 55 ft southeast of the sump. The sump has been filled with concrete and its outlet is plugged (date not known). Currently, the outfall receives only storm water.

Phase I Consent Order sampling is complete for SWMU 14-006. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for one detection of uranium-238, which was below the industrial SSL. SWMU 14-006 will be recommended for corrective action complete in the supplemental investigation report for Cañon de Valle Aggregate Area TA-14, to be submitted to NMED in 2015. SWMU 14-006 will be eligible for a COC upon approval of the report by NMED.

AOC 14-001(g) is an active firing pad (structure 14-35) located south of control building 14-23 at TA-14. Installed in 1964, the reinforced concrete pad is 5 ft² × 2 ft thick and surrounded on three sides with a blast shield. At the base, the shield is a 6-ft² × 2-ft-thick concrete pad overlain by a neoprene shock pad, a 4.5-in.-thick steel plate, and several inches of sand. The shield directs the force of detonations away from nearby control building 14-23. The AOC 14-001(g) firing pad is used to conduct test shot experiments.

Since AOC 14-001(g) is an active firing point, Consent Order samples were collected in sediment catchment areas in the drainage downgradient of the Site to determine if contaminants are migrating from the Site. Consent Order sampling data indicate all detected inorganic and organic chemical concentrations and radionuclide activities are below residential SSLs and confirmed that contaminants are not migrating from the Site. Consent Order investigations will not be conducted at AOC 14-001(g) until firing point activities cease.

The project map (Figure 193-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

193.2 Control Measures

There are potential run-on contributions from the paved areas around building 14-023. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 193-1).

Table 193-1 Active Control Measures

			Purpose	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01202040013	Established Vegetation	-	х	Х	-	В
V01203010006	Earthen Berm	Х	-	-	Х	СВ
V01203010016	Earthen Berm	-	Х	-	Х	В
V01203020003	Base Course Berm	-	Х	-	Х	СВ
V01203060015	Straw Wattle	Х	-	-	х	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

193.3 Storm Water Monitoring

SWMU 14-006 and AOC 14-001(g) are monitored within CDV-SMA-6.01. Following the installation of baseline control measures, a baseline storm water sample was collected on July 31, 2014 (Figures 193-2 and 193-3). Analytical results from this sample yielded the following TAL exceedances:

- Copper concentrations of 10 µg/L (MTAL is 4.3 µg/L),
- Gross-alpha activity of 140 pCi/L (ATAL is 15 pCi/L), and
- Radium-226 and radium-228 activity of 46.3 pCi/L (ATAL is 30 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 14-006:

- Copper is not known to be associated with industrial materials historically managed at the Site. Copper was detected above BVs in 4 of 7 shallow (i.e., less than 3 ft bgs) 2011 Consent Order soil and tuff samples at a maximum concentration 5.6 times the soil BV.
- Alpha-emitting radionuclides may have been associated with industrial materials historically managed at the Site. However, radium-226 and radium-228 are not known to be associated with industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity or radium isotopes but were analyzed for uranium isotopes, which are alpha-emitting radionuclides. No alpha-emitting radionuclides were detected or detected above BVs and/or FVs. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

AOC 14-001(g):

- Copper is known to be associated with industrial materials historically managed at the Site. Copper was detected above BVs in 3 of 30 shallow 2011 Consent Order soil and tuff samples at a maximum concentration 2 times the soil BV.
- Alpha-emitting radionuclides may have been associated with industrial materials historically managed at the Site. However, radium-226 and radium-228 are not known to be associated with industrial materials historically managed at the Site. Shallow Consent Order samples were not

analyzed for gross-alpha radioactivity or radium isotopes but were analyzed for uranium isotopes, which are alpha-emitting radionuclides. No alpha-emitting radionuclides were detected or detected above BVs and/or FVs. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 193-2 and 193-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 193-2 and 193-3.

Monitoring location CDV-SMA-6.01 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2014 is between these two values.
- Gross alpha—Gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and gross-alpha background storm water UTL for storm water runon from a developed urban landscape is 32.5 pCi/L. The 2014 gross-alpha result is between these two values.
- Radium-226 and Radium-228— Radium-226 and radium-228 UTL for background storm water containing sediment derived from Bandelier Tuff is 52.7 pCi/L, and radium-226 and radium-228 background storm water UTL for storm water run-on from a developed urban landscape is 8.94 pCi/L. The 2014 radium-226 and radium-228 result is between these two values.

All the analytical results for these samples are reported in the 2014 Annual Report.

193.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-6.01 during the 2014 season. These rain events triggered three post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38694	5-30-2014
Storm Rain Event	BMP-39831	7-21-2014
Storm Rain Event	BMP-41577	8-13-2014
Annual Erosion Evaluation	COMP-43289	10-8-2014
TAL Exceedance	COMP-44024	10-8-2014

Table 193-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Maintenance		Maintenance	Response	
Reference	Maintenance Conducted	Date	Time	Response Discussion
BMP-36952	Added clean fill to gullies and compacted. Applied seed and matting to slope. Reinstalled straw wattles along the top of the slope. Removed silt fence next to earthen berm V01203010016. Repaired earthen berm V01203020003 by adding base course to damaged areas and to level north end and compacted. Removed TRM and applied clean fill and compacted. Applied seed to berm, nonwoven geotextile fabric to spillway and TRM to entire berm and spillway.	4-25-2014	213 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.
BMP-40880	Built up and extended berm V01203010016 to the north approximately 8 ft. Removed matting and recompacted. Added berm fill to bring height to approximately 1 1/2 ft. Recontoured spillway in same location and lined with nonwoven geotextile fabric and TRM. Applied seed and coconut matting to berm.	9-19-2014	60 day(s)	Maintenance delayed.
BMP-43358	Installed new straw wattle directly upgradient of existing wattle V01203060015 as a replacement.	10-23-2014	15 day(s)	Maintenance conducted as soon as practicable.

Table 193-3Maintenance during 2014

193.5 Compliance Status

The Sites associated with CDV-SMA-6.01 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 193-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 14-001(g)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 10-20-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 11-07-2015.
SWMU 14-006	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 10-20-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 11-07-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.





84



Figure 193-2 Inorganic analytical results summary plot for CDV-SMA-6.01

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

85



Figure 193-3 Organic analytical results summary plot for CDV-SMA-6.01

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

194.0 CDV-SMA-6.02: SWMU 14-002(c), 14-002(d) and 14-002(e)

194.1 Site Descriptions

Three historical industrial activity areas are associated with V012A, CDV-SMA-6.02: Sites 14-002(c), 14-002(d) and 14-002(e).

SWMU 14-002(c) is a decommissioned firing site (structure 14-5) located in the southeastern portion of TA-14. Structure 14-5 consisted of a control building and firing pad. Constructed in 1944, the wood-framed control building measured 11 ft wide \times 18 ft long \times 10 ft high and was surrounded on three sides by an earthen berm. A 10-ft² \times 8-ft-high concrete firing pad faced with a 0.5-in. steel plate was attached to the exterior south wall of the control building. The firing site was used to conduct small-scale explosive tests until the mid-1950s. The control building was converted to a storage site in 1961 and used to store cyanogen gas from 1965 to the 1970s. In 1980, a 5-ft-diameter metal sphere was installed on the firing pad at the south side of building 14-5. The sphere was used to conduct slow-combustion experiments, which continued until 1985, when building operations ceased. The firing pad was removed at an unknown date. The control building was partially destroyed by the Cerro Grande fire in 2000; only the concrete portions of the roof and walls remain.

Before implementation of the 2011 Consent Order sampling for Sites in the Water/Cañon de Valle watershed, the historical information was thoroughly reviewed. The review determined that SWMU 14-002(c) should be added to CDV-SMA-6.02. Accordingly, the Site description and project map (Figure 194-1) have been updated to include SWMU 14-002(c). SWMU 14-002(c) is located within the current SMA boundary, and no changes to the SMA boundary are required. The sampler location will not change, and samples previously collected are representative of SWMU 14-002(c). An explanation of the error will be incorporated in the IP renewal application. The information and evaluation of Site 14-002(c) provided below and in other sections of this SDPPP update are for informational purposes only.

Phase I Consent Order investigation is complete for SWMU 14-002(c). Consent Order sampling data indicate all detected inorganic and organic chemical concentrations are below residential SSLs. SWMU 14-002(c) is expected to be eligible for a COC under the Consent Order after the supplemental investigation report for Cañon de Valle Aggregate Area, TA-14 is approved by NMED.

SWMU 14-002(d) is an x-unit chamber (structure 14-14) located at TA-14, approximately 7 ft southwest of structure 14-5. Constructed in 1944, the x-unit chamber was one of two voltage distribution systems installed at the SWMU 14-002(c) firing site. The x-unit chamber was constructed of reinforced concrete and measured approximately 3 ft wide × 4 ft long × 3 ft high. The x-unit housed the firing voltage distribution system used for the remote detonation of small-scale explosives tests at structure 14-5. The x-unit was used from 1944 to the mid-1950s when explosives operations ceased. It is not known whether the chamber is still in place. The investigation of SWMU 14-002(d) is deferred per Table IV-2 of the Consent Order. The 1994 RFI work plan for OU 1085 incorrectly identified SWMU 14-002(d) as a firing pad associated with former control building 14-5 [SWMU 14-002(c)]. Engineering drawings reviewed during planning for Consent Order investigations confirmed the firing pad was actually part of SWMU 14-002(c) and SWMU 14-002(d) is an x-unit chamber (ENG C-365). Potential contaminants associated with industrial materials historically managed at this Site are PCBs. Potential contaminants associated with adjacent SWMU 14-002(c), which is also located within the CDV-SMA-6.02 drainage, are copper, mercury, and uranium.

SWMU 14-002(e) is an x-unit chamber (structure 14-15) located at TA-14, approximately 7 ft southeast of structure 14-5. Constructed in 1944, the x-unit chamber was one of two voltage distribution systems installed at the SWMU 14-002(c) firing site. The x-unit chamber was constructed of reinforced concrete

and measured approximately 3 ft wide × 4 ft long × 3 ft high. The x-unit housed the firing voltage distribution system used for the remote detonation of small-scale explosives tests at structure 14-5. The x-unit was used from 1944 to the mid-1950s when explosives operations ceased. It is not known whether the chamber is still in place. The investigation of SWMU 14-002(e) is deferred per Table IV-2 of the Consent Order. The 1994 RFI work plan for OU 1085 incorrectly identified SWMU 14-002(e) as a firing pad associated with former control building 14-5 [SWMU 14-002(c)]. Engineering drawings reviewed during planning for Consent Order investigations confirmed the firing pad was actually part of SWMU 14-002(c).

The project map (Figure 194-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

194.2 Control Measures

There are no run-on contributions to this SMA. The area is slightly elevated, thus reducing the potential impact from run-on from the paved access road north of the SMA. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 194-1).

Enhanced controls were installed and certified on July 18, 2012, and submitted to EPA on July 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 194-1 Active Control Measures

			Purpose	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V012A01010005	Seed and Wood Mulch	-	-	Х	-	EC
V012A03010004	Earthen Berm	-	Х	-	Х	EC
V012A03010006	Earthen Berm	-	Х	-	Х	EC
V012A03060007	Straw Wattle	-	Х	-	Х	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

194.3 Storm Water Monitoring

SWMU 14-002(c) is monitored within CDV-SMA-6.02. Following the installation of baseline control measures, baseline confirmation samples were collected on August 13, 2011, and September 1, 2011 (Figures 194-2 and 194-3). Inorganic analytical results from these baseline samples yielded the following TAL exceedances:

- Copper concentrations of 28.1 µg/L and 29.3 µg/L (MTAL is 4.3 µg/L),
- Mercury concentrations of 1.6 μg/L and 0.95 μg/L (MTAL is 0.77 μg/L), and
- Gross-alpha activities of 147 pCi/L and 199 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at CDV-SMA-6.02, a corrective action storm water sample was collected on September 13, 2013 (Figures 194-2 and 194-3). Analytical results from this corrective action monitoring sample yielded no TAL exceedances.

These exceedances are typically evaluated by comparing the results from soil samples collected at the Sites during Consent Order investigations with the storm water TAL exceedances to determine whether the exceedance may be related to historical industrial activities. The following discussion is organized by Site and analyte.

SWMU 14-002(c):

- Copper is not known to be associated with industrial materials historically managed at this Site. Copper was not detected above BVs in any of the five shallow RFI samples collected at this Site.
- Mercury is not known to be associated with industrial materials historically managed at this Site. Mercury was not detected or was not detected above BVs in any of the five shallow RFI samples collected at this Site.
- Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. RFI samples were not analyzed for gross-alpha radioactivity but were analyzed for total uranium, which contains alpha-emitting radionuclides, and for uranium isotopes, which are alpha-emitting radionuclides.

Site history and Consent Order sampling data indicate the Site is unlikely a source of the TAL exceedances. The Site is impacted by active firing site operations.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 194-2 and 194-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads,



CDV-SMA-6.02, Seed and Wood Mulch, V012A01010005 (photo ID 23502-1)

and associated features, and are labeled "Developed Background" in Figures 194-2 and 194-3.

Monitoring location CDV-SMA-6.02 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well locations with sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; copper background storm water UTL from locations with sediment derived from Bandelier Tuff is 3.43 µg/L. The copper results from 2011 are between these values.
- Mercury—The mercury UTLs from developed urban landscape storm water run-on and from locations with sediment derived from Bandelier Tuff were not calculated because the number of detected values was not sufficient to allow calculation of a UTL value in the baseline metals concentration study. Therefore, a comparison with background mercury UTLs could not be made.

• Gross alpha—The gross-alpha background UTL for locations with sediment derived from Bandelier Tuff is 1490 pCi/L and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2011 gross-alpha results are between these two values.

All the analytical results for these samples are reported in the 2011 and 2013 Annual Reports.

194.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-6.02 during the 2014 season. These rain events triggered three post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38695	5-30-2014
Storm Rain Event	BMP-39832	7-21-2014
Storm Rain Event	BMP-41578	8-13-2014
Annual Erosion Evaluation	COMP-43290	10-8-2014

Table 194-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 194-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-36923	Repaired berm breach by removing matting. Added clean fill and compacted. Contoured spillway at the location berm breached. Applied nonwoven geotextile fabric and rock to spillway. Applied seed and matting to berm. Applied seed and mulch to areas disturbed by maintenance activities.	4-22-2014	210 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

194.5 Compliance Status

The Sites associated with CDV-SMA-6.02 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 194-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU (14-002(c)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 07-18-2012.
SWMU 14-002(d)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 07-18-2012
SWMU 14-002(e)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 07-18-2012.





100.00																			
	SMA	A: CDV	-SMA	-6.02															
(10.00)			◆ baselir ▲ correc ━ GeoMe ━ Bande	ne, 8/13/2 ne, 9/1/20 tive actio ean/ATAL lier Tuff E oped Back	011 n, 9/13/: Jackgrou	nd/TAL				•								•	
Exceedance Ratio (Result / TAL)	•		∆ ◆		<u>-</u>				*	•		<u>∧</u>	\$	Δ		*	Δ	*	•
во Х Ш 0.10 -			÷		\									♦			 		
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0.01															\diamond				
	Aluminum	Antimony	Arsenic	Boron	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc	Cyanide, weak acid dissociable	Gross alpha	Radium-226 and Radium-228
td used in ratio alculations	MTAL	ATAL	ATAL	ATAL	MQL	MTAL	ATAL	MTAL	MTAL	ATAL	MTAL	ATAL	MQL	ATAL	ATAL	MTAL	MQL	ATAL	ATAL
td value	750	640	9	5000	1	210	1000	4.3	17	0.77	170	5	0.5	6.3	100	42	0.01	15	30
nit	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	mg/L	pCi/L	pCi/L
0/12/2012 *****	309	3	5	50 0.01	1 1	10 0.048	1.54 0.0015	1.16 0.27	0.596	0.2 0.26	0.621	5 1	1 2	2 0.32	5 0.05	10 0.24	0.005 0.5	6.97 0.46	1.64 0.055
	0.41	0 005				10.040	LO'00TO	0.27	0.055	0.20	0.0057	1	2	0.52	0.05	0.24	0.5	0.40	0.035
9/13/2013 result result / TAL 9/1/2011 result	-	0.005	0.56				3.2	28.1	72	16	1.2	2	0.2	0.45	1	10.4	0.002	1/17	5.94
result / TAL 9/1/2011 result	267	1	1.7	28.1	0.11	2	3.2 0.0032	28.1 6.5	7.3 0.43	1.6 2.1	1.3 0.0076	2 0.4	0.2 0.4	0.45 0.071	1 0.01	10.4 0.25	0.002 0.15	147 9.8	5.94 0.2
result / TAL	267						3.2 0.0032 1.8	28.1 6.5 29.3	7.3 0.43 6.6	1.6 2.1 0.95	1.3 0.0076 1.2	2 0.4 1.5	0.2 0.4 0.2	0.45 0.071 0.45	1 0.01 2.1	10.4 0.25 9.2	0.002 0.15 0.002	147 9.8 199	5.94 0.2 8.5

Figure 194-2 Inorganic analytical results summary plot for CDV-SMA-6.02

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

		SM	A: CD	/-SM/	A-6.02																		
(Result / TAL)	10.00 -			◇ baseli ▲ corre ● GeoN ● Bande	ine, 8/13 ine, 9/1/ ctive act lean/AT/ elier Tuff oped Ba	2011 ion, 9/13 AL Backgro	ound/TAL																
Exceedance Ratio(Result / TAL)	1.00 - 0.10 -																						
	0.01																						\diamond
		Aldrin	Benzo(a)pyrene	BHC[gamma-]	Chlordane (alpha/gamma)	Chlordane[alpha-]	Chlordane[gamma-]	DDD[4,4'-]	DDE[4,4'-]	DDT[4,4'-]	Dieldrin	Endosulfan I	Endosulfan II	Endrin	Heptachlor	Heptachlor Epoxide	Hexachlorobenzene	Pentachlorophenol	RDX	Tetrachlorodibenzo dioxin[2,3,7,8-]	Total PCB	Toxaphene (Technical Grade)	Trinitrotoluene
std used calculatic		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	ATAL	-	-	-	ATAI
std value		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	200	-	-	-	20
unit		ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1	013 result	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.368	-	-	-	0.282
	sult / TAL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.002	-	-	-	0.014
1	11 result sult / TAL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.391 0.002	-	-	-	-
		-	-	-	-	-	- 1	-	-	-	-	-	-	-	-		-	-		-	-		

Figure 194-3 Organic analytical results summary plot for CDV-SMA-6.02

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE VALLE WATERSHED**

195.0 CDV-SMA-7: SWMU 15-008(d)

195.1 Site Descriptions

One historical industrial activity area is associated with V013, CDV-SMA-7: Site 15-008(d).

SWMU 15-008(d) is an inactive surface disposal area located south of former storage building 15-22 on the west side of TA-15. The disposal area consists of a small pile of building debris. The source of the building debris and the date it was placed at this location are not known.

Consent Order sampling has not been conducted at SWMU 15-008(d); no historical investigations were conducted before the Consent Order went into effect in 2005.

The project map (Figure 195-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

195.2 Control Measures

Potential run-on to this Permitted Feature primarily originates on the paved access road and natural areas around the SMA. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 195-1).

Table 195-1 Active Control Measures

			Purpose of Control			Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01302040008	Established Vegetation	-	Х	Х	-	В
V01303010006	Earthen Berm	Х	-	-	Х	СВ
V01303010007	Earthen Berm	-	Х	-	Х	СВ
V01304040009	Culvert	Х	-	Х	-	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

195.3 Storm Water Monitoring

SWMU 15-008(d) is monitored within CDV-SMA-7. Following the installation of baseline control measures, a baseline storm water sample was collected on September 13, 2013 (Figure 195-2). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 956 μg/L (MTAL is 750 μg/L),
- Selenium concentration of 5.33 $\mu g/L$ (ATAL is 5 $\mu g/L),$ and
- Gross-alpha activity of 191 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 15-008(d):

• Based on the site history, the Site is unlikely a source of the aluminum, selenium, and grossalpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 195-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 195-2.

Monitoring location CDV-SMA-7 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including aluminum are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Aluminum—The aluminum UTL from developed urban landscape storm water run-on is 245 µg/L; the aluminum UTL for background storm water containing sediment derived from Bandelier Tuff is 2210 µg/L. The aluminum result from 2013 is between these two values.
- Selenium—The selenium UTLs from undisturbed Bandelier Tuff and from developed urban landscape background storm water run-on were not calculated because the number of detected values was not sufficient to permit calculation of the UTL values in the baseline metals background study. Therefore, no comparison to selenium background values in storm water could be made.
- Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2013 Annual Report.

195.4 Inspections and Maintenance

RG257 recorded six storm events at CDV-SMA-7 during the 2014 season. These rain events triggered three post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38693	6-2-2014
Storm Rain Event	BMP-39830	7-21-2014
Storm Rain Event	BMP-41576	8-13-2014
Annual Erosion Evaluation	COMP-43303	10-7-2014

Table 195-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 195-3Maintenance during 2014

Maintenance	Maintenance Conducted	Maintenance	Response	Response
Reference		Date	Time	Discussion
BMP-42269	Modified berms V01303010006 and V01303010007. Removed existing matting and recompacted existing berms. Added clean fill to increase height approximately 1 ft 6 in. Extend and compacted the west end of berm V01303010006 and the west and east ends of berm V01303010007. Applied seed and coconut matting.	9-18-2014	36 day(s)	Maintenance delayed.

195.5 Compliance Status

The Site associated with CDV-SMA-7 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 195-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-008(d)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-30-2013. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 10-18-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED



Figure 195-2 Inorganic analytical results summary plot for CDV-SMA-7

196.0 CDV-SMA-8: SWMU 15-011(c)

196.1 Site Descriptions

One historical industrial activity area is associated with V014, CDV-SMA-8: Site 15-011(c).

SWMU 15-011(c) is a purported dry well located west of the former electron gun building (15-194) near the edge of Cañon de Valle. Engineering drawing C-19082 depicts the dry well design and location; however, the drawing is not an as-built, and it is likely the dry well was never constructed. The OU 1086 RFI work plan states that no evidence of the dry well was found at the time the work plan was prepared and concludes that effluent from the building was discharged directly to the canyon via the drainage located north and west of the former Hollow buildings. This conclusion is consistent with the CEARP report and the SWMU report.

This effluent consisted of the discharge from two acid-cleaning sinks within former building 15-50. The sinks were removed before 1986. Building 15-194 and 15-50 were decommissioned in the mid-1990s, sustained severe damage in the 2000 Cero Grande fire, and were subsequently demolished in 2004. The 1996 RFI report for Sites within TA-15 describes the SWMU as the drainage located (north and) west of the buildings located at the Hollow; however, the drainage north and west of the former buildings 15-194 and 15-50 is SWMU 15-014(g).

Consent Order investigations have not yet begun; decision-level data are not available for SWMU 15-011(c).

The project map (Figure 196-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

196.2 Control Measures

There is run-on potential from the paved areas northeast of the sampler. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 196-1).

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01402040009	Established Vegetation	-	Х	Х	-	В
V01403010008	Earthen Berm	Х	-	-	Х	В
V01403010012	Earthen Berm	Х	-	-	Х	В
V01406010003	Rock Check Dam	Х	-	-	Х	СВ
V01406010004	Rock Check Dam	Х	-	-	Х	СВ
V01406010010	Rock Check Dam	Х	-	-	Х	В
V01406010011	Rock Check Dam	Х	-	-	Х	В
V01406010013	Rock Check Dam	Х	-	-	Х	В
V01406010014	Rock Check Dam	Х	-	-	Х	В
V01406010015	Rock Check Dam	Х	-	-	Х	В

Table 196-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

196.3 Storm Water Monitoring

SWMU 15-011(c) is monitored within CDV-SMA-8. Following the installation of baseline control measures, a baseline storm water sample was collected on July 31, 2014 (Figures 196-2 and 196-3). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 1360 μg/L (MTAL is 750 μg/L) and
- Gross-alpha activity of 53.4 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 15-011(c):

- Aluminum is not known to be associated with industrial materials historically managed at the Site. Consent Order investigations have not been performed at SWMU 15-011(c); no decision-level data are available for this Site.
- Alpha-emitting radionuclides are not known to have been associated with industrial materials historically managed at this Site.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 196-2 and 196-3. UTLs developed for urban settings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 196-2 and 196-3.

Monitoring location CDV-SMA-8 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including aluminum are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Aluminum—The aluminum UTL from developed urban landscape storm water run-on is 245 μg/L; the aluminum UTL for background storm water containing sediment derived from Bandelier Tuff is 2210 μg/L. The aluminum result from 2014 is between these values.
- Gross alpha—Gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and gross-alpha background storm water UTL for storm water runon from a developed urban landscape is 32.5 pCi/L. The 2014 gross-alpha result is between these values.

All the analytical results for these samples are reported in the 2014 Annual Report.

196.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at CDV-SMA-8 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38716	6-2-2014
Storm Rain Event	BMP-39066	6-16-2014
Storm Rain Event	BMP-39349	6-30-2014
Storm Rain Event	BMP-40079	7-21-2014
Storm Rain Event	BMP-41071	8-8-2014
Storm Rain Event	BMP-42045	8-18-2014
Storm Rain Event	BMP-42652	9-16-2014
Storm Rain Event	BMP-43142	10-6-2014
Annual Erosion Evaluation	COMP-43304	10-8-2014
TAL Exceedance	COMP-44027	10-8-2014

Table 196-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 196-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-40079	Removed needle cast from rock check dam V01406010004 at inspection.	7-21-2014	0 day(s)	Maintenance conducted as soon as practicable.
BMP-42271	Removed needle cast and debris from check dams V01406010003 and V01406010004. Placed outside channel.	8-25-2014	7 day(s)	Maintenance conducted as soon as practicable.
BMP-42270	Removed matting on west section of berm V01403010012. Added clean fill to match height of east berm section. Extended spillway approximately 2ft west. Lined spillway with geotextile fabric and rock. Reapplied seed and coconut matting to repaired area. Ensured rock on spillway is lower in the center than the edges. Applied seed and mulch to areas disturbed by maintenance activities. Installed 3 rock check dams.	9-3-2014	16 day(s)	Maintenance conducted as soon as practicable.
BMP-42085	Repaired breach on east side of berm V01403010012 spillway using material equivalent to existing material. Removed debris and placed outside channel. Removed debris from check dams V01406010003 and V01406010004 and placed outside channel.	9-4-2014	27 day(s)	Maintenance conducted as soon as practicable.

196.5 Compliance Status

The Site associated with CDV-SMA-8 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 196-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-011(c)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 10-7-2014. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED



Figure 196-2 Inorganic analytical results summary plot for CDV-SMA-8

EP2015-0051

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE** VALLE WATERSHED



Figure 196-3 Organic analytical results summary plot for CDV-SMA-8

197.0 CDV-SMA-8.5: SWMU 15-014(a)

197.1 Site Descriptions

One historical industrial activity area is associated with V015, CDV-SMA-8.5: Site 15-014(a).

SWMU 15-014(a) is an inactive drainline and outfall associated with former building 15-183. The drainline received effluent from former photoprocessing operations in building 15-183 and discharged to a former NPDES-permitted outfall (EPA 06A123), located approximately 130 ft from the edge of Cañon de Valle. The drainline and outfall began receiving effluent in 1961 when building 15-183 was first constructed. The drainline and the outfall discharge point were plugged in 1997 when the drainline was tied into the TA-16 sanitary sewer system. The outfall was removed from the NPDES permit as of January 14, 1998. Building 15-183 is currently used as a general nonnuclear laboratory.

Consent Order investigations have not yet begun; decision-level data are not available for SWMU 15-014(a).

The project map (Figure 197-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

197.2 Control Measures

Run-on is a result of flow off the paved area at the north corner of building 16-0313 and the associated roof drainage. Potential run-on from both the paved area and roof drains are captured by a culvert and diverted southwest of the area. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 197-1).

Table 197-1 Active Control Measures

			Purpose of Control			Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01502040006	Established Vegetation	-	х	Х	-	В
V01503010004	Earthen Berm	-	Х	-	Х	СВ
V01503010005	Earthen Berm	Х	-	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

197.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at CDV-SMA-8.5. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

197.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at CDV-SMA-8.5 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 197-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38717	6-2-2014
Storm Rain Event	BMP-39067	6-16-2014
Storm Rain Event	BMP-39350	6-30-2014
Storm Rain Event	BMP-40080	7-21-2014
Storm Rain Event	BMP-41072	8-8-2014
Storm Rain Event	BMP-42046	8-18-2014
Storm Rain Event	BMP-42653	9-16-2014
Storm Rain Event	BMP-43143	10-6-2014
Annual Erosion Evaluation	COMP-43305	10-7-2014

No maintenance activities or facility modifications affecting discharge were conducted at CDV-SMA-8.5 in 2014.

197.5 Compliance Status

The Site associated with CDV-SMA-8.5 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 197-3 Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-014(a)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment







108
198.0 CDV-SMA-9.05: SWMU 15-007(b)

198.1 Site Descriptions

One historical industrial activity area is associated with V016, CDV-SMA-9.05: Site 15-007(b).

SWMU 15-007(b) is a surface disposal area known as MDA Z that is located northwest of Firing Site G [SWMU 15-004(g)] in the south-central portion of TA-15 on the south side of the road leading to building 15-233. A geophysical survey conducted during the 1995 RFI yielded the following: MDA Z is roughly triangular and approximately 225 ft long × 50 ft wide with a surface area of approximately 11,250 ft²; the volume of MDA Z measures approximately 2000 yd³. Beginning in 1965, MDA Z received construction and shot debris from PHERMEX consisting of used sandbags filled with concrete and steel blast matting. Disposal activities at MDA Z ceased in the 1980s. When the Site was surveyed after the 2000 Cerro Grande fire, only minor burning of groundcover was noted. The presence of DU in surface soils at the Site was noted during the RFI and during a site visit in 2010.

Consent Order investigations have not yet begun; decision-level data are not available for SWMU 15-007(b).

The project map (Figure 198-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

198.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 198-1).

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
V01602040005	Established Vegetation	-	х	Х	-	В
V01603010002	Earthen Berm	-	Х	-	Х	CB
V01603010003	Earthen Berm	-	х	-	Х	СВ
V01603010004	Earthen Berm	Х	-	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

198.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at CDV-SMA-9.05. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

198.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at CDV-SMA-9.05 during the 2014 season. These rain events triggered 9 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 198-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38718	6-4-2014
Storm Rain Event	BMP-39068	6-17-2014
Storm Rain Event	BMP-39351	6-26-2014
Storm Rain Event	BMP-40081	7-10-2014
Storm Rain Event	BMP-40469	7-28-2014
Storm Rain Event	BMP-41223	8-8-2014
Storm Rain Event	BMP-42047	8-19-2014
Storm Rain Event	BMP-42654	9-16-2014
Storm Rain Event	BMP-43144	10-6-2014
Annual Erosion Evaluation	COMP-43201	10-6-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 198-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-36927	Repaired berms V01603010002, V01603010003, and V01603010004 by removing matting from breached/damaged areas. Added clean fill and compacted. Applied seed and matting to repaired areas. Raked areas disturbed by maintenance activities (e.g., skid steer tracks) and applied seed. Used matting removed from berms over seeded areas. Applied mulch if matting did not cover all the seeded areas.	6-10-2014	258 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

198.5 Compliance Status

The Site associated with CDV-SMA-9.05 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 198-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-007(b)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

199.0 F-SMA-2: AOC 36-004(c)

199.1 **Site Descriptions**

One historical industrial activity area is associated with F001, F-SMA-2: Site 36-004(c).

AOC 36-004(c) consists of an active firing site, known as Minie Firing Site, located at TA-36 near the head of Fence Canyon, approximately 800 ft south of the Meenie Firing Site [AOC 36-004(b)]. Facilities associated with the Minie Firing Site include a control bunker (building 36-8), a make-up building (building 36-7), a firing platform, and an x-ray house. Construction of the Minie Firing Site was completed in 1950. The Site has been used extensively to conduct armor-piercing experiments in which penetrator jets are directed at targets at the canyon wall to the west of the site. Metal plates are placed behind the targets to stop the penetrators. The Minie Firing Site has also been used for OD of scrap HE. In addition, emergency detonation of leaking gas cylinders has also been performed, but on a very infrequent basis.

Consent Order nature and extent sampling was not conducted at AOC 36-004(c) because the Site is an active RCRA-regulated OD unit. However, Consent Order samples were collected in sediment catchment areas in the drainage channel downgradient of the Site to determine if contaminants are migrating from the Site. The migration of potential contaminants from AOC 36-004(c) is limited to the drainage downgradient of the Site



F-SMA-2, Earthen Berm, F00103010014 (photo ID 38571-3)

for all constituents and does not extend beyond Fence Canyon Reach F-3. Further Consent Order investigations are delayed until the firing site is no longer active.

The project map (Figure 199-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: http://www.lanl.gov/community-environment/environmentalstewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

199.2 **Control Measures**

Most of the potential run-on at this SMA originates on the natural slope on the northern side. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 199-1).

Enhanced controls were installed and certified on June 27, 2014, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/communityenvironment/environmental-stewardship/protection/compliance/individual-permitstormwater/construction-certifications.php.

Table 199-1 Active Control Measures

			Purpose o	of Control		Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
F00102040018	Established Vegetation	-	х	х	-	В
F00103010010	Earthen Berm	-	х	-	Х	В
F00103010011	Earthen Berm	-	Х	-	Х	EC
F00103010012	Earthen Berm	-	х	-	Х	EC
F00103010013	Earthen Berm	-	х	-	Х	EC
F00103010014	Earthen Berm	-	х	-	Х	EC
F00103010015	Earthen Berm	-	х	-	Х	EC
F00103010017	Earthen Berm	-	Х	-	Х	В
F00103120019	Rock Berm	Х	-	-	Х	В
F00103120020	Rock Berm	Х	-	-	Х	В
F00104010001	Earthen Channel/Swale	Х	-	х	-	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

199.3 Storm Water Monitoring

AOC 36-004(c) is monitored within F-SMA-2. Following the installation of baseline control measures, a baseline storm water sample was collected on August 15, 2011 (Figures 199-2 and 199-3). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 866 μg/L (MTAL is 750 μg/L),
- Copper concentration of 72.5 μ g/L (MTAL is 4.3 μ g/L), and
- Gross-alpha activity of 140 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at F-SMA-2, corrective action storm water samples were collected on July 15, 2014, and July 31, 2014 (Figures 199-2 and 199-3). Analytical results from these corrective action monitoring samples yielded the following TAL exceedances:

- Copper concentrations of 10.8 µg/L (MTAL is 4.3 µg/L) and
- Gross-alpha activity of 112 and 58.9 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

AOC 36-004(c):

• Copper was likely associated with industrial materials historically managed at this Site. Copper was detected in 5 of 14 samples at maximum concentration 2.9 times the sediment BV.

• Alpha-emitting radionuclides are known to be associated with industrial materials historically managed at AOC 36-004(c). Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed using gamma spectroscopy, which is capable of detecting americium-241 and uranium-235, and for uranium isotopes, all of which are alpha-emitting radionuclides. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross alpha radioactivity.



F-SMA-2, Earthen Berm, F00103010015 (photo ID 23503-5)

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in

Figures 199-2 and 199-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 199-2 and 199-3.

Monitoring location F-SMA-2 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; copper background storm water UTL from locations with sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2011 is greater than both of these values, while the 2014 results are between these two values.
- Gross alpha—The gross-alpha background UTL for locations with sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2011 and 2014 gross-alpha results are between these two values.

All the analytical results for these samples are reported in the 2011 and 2014 Annual Reports.

199.4 Inspections and Maintenance

RG267.4 recorded nine storm events at F-SMA-2 during the 2014 season. These rain events triggered five post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 199-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Verification Inspection for Enhanced Controls	BMP-38571	5/29/2014
Storm Rain Event	BMP-39363	6-26-2014
Storm Rain Event	BMP-39683	7-16-2014
Storm Rain Event	BMP-40826	8-1-2014
Storm Rain Event	BMP-42442	9-9-2014
Storm Rain Event	BMP-43156	10-7-2014
Annual Erosion Evaluation	COMP-43202	10-2-2014
TAL Exceedance	COMP-42738	10-2-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 199-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37983	Repaired breach and increased height to match elevation of all ends by adding clean fill to earthen berms F00103010011, F00103010012, F00103010013, F00103010014, and F00103010015. Installed spillway and lined with nonwoven geotextile fabric and rock. Applied seed and matting to berm. Reapplied seed and matting to earthen berm F00103010017.	4-29-2014	168 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.
BMP-43393	Cleaned out and recontoured west section of channel F00104010001. Placed accumulated sediments along the edge of firing site/channel. Installed one rock berm on slope and second rock berm along toe of slope. Raked out rills on slope and seeded.	10-30-2014	28 day(s)	Maintenance conducted as soon as practicable.

199.5 Compliance Status

The Site associated with F-SMA-2 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Table 199-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 36-004(c)	Corrective Action Initiated	Corrective Action Initiated after second TAL exceedance	LANL, July 11, 2014, "Submittal of Certification of Installation of Enhanced Control Measures for Five Site Monitoring Areas (CDV-SMA-2.41, F-SMA-2, LA-SMA-5.51, PT-SMA-1.7, S-SMA-0.25)."
			Second initiation on 09-08-14. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 09-20-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 199-2 Inorganic analytical results summary plot for F-SMA-2

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Figure 199-3

Organic analytical results summary plot for F-SMA-2

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td used in ratio alculations	Aldrin	Benzo(a)pyrene	BHC[gamma-]	Chlordane (alpha/gamma)	Chlordane[alpha-]	- Chlordane[gamma-]	- DDD[4,4'-]	- DDE[4,4'-]	- DDT[4,4'-]	Dieldrin	Endosulfan I	Endosulfan II	Endrin	- Heptachlor	- Heptachlor Epoxide	Hexachlorobenzene	Pentachlorophenol	ATAL	Tetrachlorodibenzo dioxin[2,3,7,8-]	Total PCB	Toxaphene (Technical Grade)	Trinitrotoluene [2,4,6-]
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Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.



200.0 PT-SMA-0.5: SWMU 15-009(e) and AOC C-15-004

200.1 Site Descriptions

Two historical industrial activity areas are associated with I001, PT-SMA-0.5: Sites 15-009(e) and C-15-004.

SWMU 15-009(e) is a decommissioned 1500-gal. septic tank (structure 15-72) at E-F Firing Site [SWMU 15-004(f)] at TA-15. The septic tank was constructed in 1947 and received sanitary waste from the E-F Firing Site control building (15-27), located approximately 175 ft northeast of the tank. The drainline goes around structure 15-463, a transportable used for storage. The septic tank is constructed of 4- to 6-in. reinforced concrete and measures 5 ft long × 9 ft deep × 7 ft wide. The septic tank was used until 1981 when E-F Firing Site last operated. Discharges from the septic tank flowed through a VCP to an outfall located approximately 30 ft from the tank at the edge of Potrillo Canyon. During the 1997 VCA conducted at SWMU 15-009(e), the contents of the septic tank were removed, the interior of septic tank was pressure-washed, concrete-chip samples were collected from the tank interior to demonstrate the adequacy of the corrective action, and the tank and drainlines were filled and plugged with expandable concrete and left in place.

Phase I Consent Order sampling is complete for SWMU 15-009(e). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order and VCA confirmation samples were below residential SSLs. SWMU 15-009(e) will be recommended for corrective action complete in the supplemental investigation report for Potrillo and Fence Canyons Aggregate Area, to be submitted to NMED in 2015. SWMU 15-009(e) will be eligible for a COC upon approval of the report by NMED.

AOC C-15-004 is a former transformer station (former structure 15-56) that was located approximately 30 ft southwest of the former E-F Firing Site control room (building 15-27) at TA-15. Two transformers (18-gal. and 30-gal. capacity) were located on a 5-ft-long wooden platform 10 ft above the ground. Each transformer contained mineral oil with PCBs of unknown concentration. The date the transformers were installed is not known, but they were removed from the Site in 1989. No evidence was found of a release on the wooden platform or on the soil beneath the platform.

Phase I Consent Order sampling is complete for AOC C-15-004. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs and SALs. AOC C-15-004 will be recommended for corrective action complete in the supplemental investigation report for Water Canyon Aggregate Area, to be submitted to NMED in 2015. AOC C-15-004 will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 200-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

200.2 Control Measures

The culvert and drainage along the north and south of the access road contribute minor run-on. Existing controls address the minimal run-on contribution associated with this access road. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 200-1).

Enhanced controls were installed and certified on November 27, 2012, and submitted to EPA on December 13, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 200-1 Active Control Measures

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
100102040009	Established Vegetation	-	Х	Х	-	В
100103010007	Earthen Berm	-	Х	-	Х	EC
100103010008	Earthen Berm	Х	-	-	Х	EC
100103060010	Straw Wattle	-	Х	-	Х	В
100103060011	Straw Wattle	-	Х	-	Х	В
100104030012	Rock Channel/Swale	Х	-	Х	-	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

200.3 Storm Water Monitoring

SWMU 15-009(e) and AOC C-15-004 are monitored within PT-SMA-0.5. Following the installation of baseline control measures, a baseline storm water sample was collected on September 1, 2011 (Figures 200-2 and 200-3). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 1380 μg/L (MTAL is 750 μg/L),
- Copper concentration of 6.5 μ g/L (MTAL is 4.3 μ g/L), and
- Gross-alpha activity of 79.5 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e. less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 15-009(e):

- Aluminum is not known to be associated with industrial materials historically managed at this Site. Aluminum was not detected above BVs in any of the 13 shallow Consent Order and VCA confirmation samples collected at SWMU 15-009(e).
- Copper is not known to be associated with industrial materials historically managed at this Site. Copper was detected above the BV in 1 of 13 shallow Consent Order and VCA confirmation samples collected at SWMU 15-009(e) at a concentration equivalent to the soil BV.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at SWMU 15-009(e); however, they are associated with industrial materials managed at adjacent E-F Firing Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, the Site in unlikely a source of the TAL exceedances. The SMA receives runoff from industrially developed (E-F Firing Site) areas and undeveloped areas.

AOC C-15-004:

- Aluminum is not known to be associated with industrial materials historically managed at this Site. Aluminum was not detected above BVs in any of the four shallow Consent Order samples collected at AOC C-15-004.
- Copper is not known to be associated with industrial materials historically managed at this Site. Copper was detected above the BV in 3 of 4 shallow Consent Order samples collected at AOC C-15-004 at a maximum concentration 3.3 times the soil BV.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at AOC C-15-004; however, they are associated with industrial materials managed at adjacent E-F Firing Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, the Site in unlikely a source of the TAL exceedances. The SMA receives runoff from industrially developed (E-F Firing Site) areas and undeveloped areas.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 200-2 and 200-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 200-2 and 200-3.

PT-SMA-0.5 is located on Bandelier Tuff and no run-on occurs from developed facilities (i.e., buildings, pavement, and parking lots); therefore, calculated storm water UTLs from locations containing sediments derived from Bandelier Tuff were compared with aluminum, copper, and gross-alpha MTAL and ATAL exceedances. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals. Copper and aluminum are associated with minerals in the Bandelier Tuff as well.

- Aluminum—The aluminum UTL for storm water containing sediments derived from Bandelier Tuff is 2210 µg/L; the result from 2011 is less than this value.
- Copper—The copper UTL for storm water containing sediments derived from Bandelier Tuff is 3.43 μg/L; the result from 2011 is greater than this value.
- Gross alpha—The gross-alpha UTL for storm water containing sediments derived from Bandelier Tuff is 1490 pCi/L; the result from 2011 is less than this value.

All the analytical results for these samples are reported in the 2011 Annual Report.

200.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at PT-SMA-0.5 during the 2014 season. These rain events triggered 9 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38719	5-29-2014
Storm Rain Event	BMP-39069	6-16-2014
Storm Rain Event	BMP-39352	6-30-2014
Storm Rain Event	BMP-40082	7-10-2014
Storm Rain Event	BMP-40470	7-28-2014
Storm Rain Event	BMP-41224	8-7-2014
Storm Rain Event	BMP-42048	8-18-2014
Storm Rain Event	BMP-42655	9-17-2014
Storm Rain Event	BMP-43145	10-8-2014
Annual Erosion Evaluation	COMP-43210	10-2-2014

Table 200-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 200-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37038	Eastern erosion channel: Added fill and track compact to original grade and no steeper than 2:1 slope. Contoured a swale from berm 100103010008 to divert runoff away from 15-009(e). Lined swale with nonwoven geotextile fabric and appropriate-sized rock. Western erosion channel: Added fill and track compact to bring to original grade. Applied seed and TRM or hydromulch. Repaired berm 100103010007 by removing matting from spillway. Applied clean fill and compacted. Applied nonwoven geotextile fabric and TRM to spillway. Added TRM to east downslope edge of berm where erosion has been occurring. Applied rock over TRM. Repaired berm 100103010008 by removing matting from damaged/degraded area(s). Applied clean fill and compacted. Installed 12-ft-wide spillway at location of breach lined with nonwoven geotextile fabric and TRM. Applied seed and matting to berm.	4-11-2014	204 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

200.5 Compliance Status

The Sites associated with PT-SMA-0.5 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 200-4 Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-009(e)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 11-27-2012.
AOC C-15-004	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 11-27-2012.





125



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 200-2 Inorganic analytical results summary plot for PT-SMA-0.5

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

126



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 200-3 Organic analytical results summary plot for PT-SMA-0.5

127

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

201.0 PT-SMA-1: SWMUs 15-004(f) and 15-008(a)

201.1 Site Descriptions

Two historical industrial activity areas are associated with IO02, PT-SMA-1: Sites 15-004(f), and 15-008(a).

SWMU 15-004(f) is an inactive firing site, E-F Firing Site, that consists of three inactive firing points (D, E, and F) covering a total area of approximately 60 acres at TA-15. E-F Firing Site began operating in 1946 and was last used in 1981. It was operated extensively from 1947 to 1973 and was the largest firing site at the Laboratory. Originally, E-F Firing Site consisted of a single firing point (D) that was built in 1946 and that ceased to operate in 1949. In 1947, the firing area was expanded to include Firing Point E, which was used for large-scale shots containing up to 2500 lb of HE, and Firing Point F, which was used for smaller-scale shots. Firing Points E and F were approximately 650 ft apart and were wired to an underground control bunker (structure 15-27). Tests at the two firing points were conducted on the ground and created depressions in the ground. After test shots, the firing points were either regraded or backfilled with gravel to fill in the depressions. Eventually, nearby soil was mounded on the north and south sides of Firing Point E to protect TA-15 structures from shrapnel. Tests at E-F Firing Site involved HE, uranium (metal and depleted), beryllium, lead, and mercury.

Phase I Consent Order sampling is complete for SWMU 15-004(f). The objective of the investigation was to identify areas and depths of soil requiring corrective action and to determine if contaminants are migrating from the Site. Although several constituents were detected above industrial SSLs/SALs, the Site does not pose a current risk because of the administrative controls that are in place. Additional samples will be collected during the Phase II investigation to verify the distribution of potential contamination; subsequently, potential corrective actions for the Site will be identified and evaluated. Although several constituents were detected above industrial SSLs/SALs, the Site does not pose a current risk because of the advected above industrial SSLs/SALs, the Site does not pose a current swere detected above industrial SSLs/SALs, the Site does not pose a current risk because of the administrative controls that are in place. The migration of potential contaminants from SWMU 15-004(f) is limited to the drainage downgradient of the Site for most constituents and does not extend beyond Potrillo Canyon Reach PO-3.

SWMU 15-008(a) is the location of two former small surface disposal areas on the edge of Potrillo Canyon, south and east of E-F Firing Site [SWMU 15-004(f)], at TA-15. The disposal areas were located within approximately 350 ft of each other, with each disposal area having dimensions of approximately 8 ft in diameter × 2 ft high. Both areas were used to dispose of debris from tests conducted at E-F Firing Site, including soil, rock, pebbles, metal fragments, plastic, electrical cable, and electrical accessories. The exact period of operation of the surface disposal areas is not known but probably falls within the period of operation for E-F Firing Site (1946 to 1981). All debris and soil were removed from both surface disposal areas during the 2010 Consent Order investigation.

Phase I Consent Order sampling is complete for SWMU 15-008(a). The Site meets industrial and construction worker risk levels. SWMU 15-008(a) is located within the boundary of E-F Firing Site [SWMU 15-004(f)], and will likely not be eligible for a COC until additional investigation and corrective actions are complete for E-F Firing Site.

The project map (Figure 201-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

201.2 Control Measures

Road run-on impacts the SMA at the 90-degree bend. This is the primary source of run-on to the Permitted Feature. Planned controls are to address this run-on source and to further stabilize bare areas. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 201-1).

Enhanced controls were installed and certified on August 3, 2012, and submitted to EPA on August 27, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
100201010022	Seed and Wood Mulch	-	-	х	-	СВ
100202040034	Established Vegetation	-	Х	х	-	В
100203010018	Earthen Berm	-	Х	-	Х	СВ
100203010019	Earthen Berm	-	Х	-	Х	СВ
100203010020	Earthen Berm	-	Х	-	Х	СВ
100203010021	Earthen Berm	-	Х	-	Х	СВ
100203010023	Earthen Berm	-	Х	-	Х	EC
100203010024	Earthen Berm	-	Х	-	Х	EC
100203010025	Earthen Berm	-	Х	-	Х	EC
100203010026	Earthen Berm	-	Х	-	Х	EC
100203010027	Earthen Berm	-	Х	-	Х	EC
100203010028	Earthen Berm	-	Х	-	Х	EC
100203010029	Earthen Berm	-	Х	-	Х	EC
100203010030	Earthen Berm	-	Х	-	Х	EC
100203060033	Straw Wattle	-	Х	-	Х	EC
100203120012	Rock Berm	х	-	-	Х	СВ
100203120013	Rock Berm	х	-	-	Х	СВ
100206010031	Rock Check Dam	-	Х	-	Х	EC
100206010032	Rock Check Dam	-	Х	-	Х	EC

Table 201-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

201.3 Storm Water Monitoring

SWMUs 15-004(f) and 15-008(a) are monitored within PT-SMA-1. Following the installation of baseline control measures, a baseline storm water sample was collected on September 1, 2011 (Figures 201-2 and 201-3). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 1380 μg/L (MTAL is 750 μg/L),
- Copper concentration of 6.5 μg/L (MTAL is 4.3 μg/L),
- Zinc concentration of 75.9 µg/L (MTAL is 42 µg/L), and
- Gross-alpha activity of 79.5 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at PT-SMA-1, corrective action storm water samples were collected on July 9, 2014, and July 31, 2014 (Figures 201-2 and 201-3). Analytical results from these corrective action monitoring samples yielded the following TAL exceedances:

- Copper concentrations of 45.5 and 21.4 µg/L (MTAL is 4.3 µg/L) and
- Gross-alpha activity of 650 and 4400 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 15-004(f):

- Copper was likely associated with industrial materials historically managed at this Site. Copper was detected above BVs in 38 of 69 shallow Consent Order and RFI samples at a maximum concentration 561 times the soil BV.
- Alpha-emitting radionuclides are known to be associated with industrial materials historically managed at this Site. Shallow RFI and Consent Order samples were not analyzed for grossalpha radioactivity but were analyzed for uranium isotopes, which are alphaemitting radionuclides. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from



the definition of adjusted gross alpha radioactivity.

SWMU 15-008(a):

- Copper was likely associated with industrial materials historically managed at this Site. Copper was detected above BVs in 15 of 22 shallow Consent Order samples at a maximum concentration 525 times the soil BV.
- Alpha-emitting radionuclides are known to be associated with industrial materials historically managed at this Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for uranium isotopes, which are alpha-emitting radionuclides. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTL) using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 201-2 and 201-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 201-2 and 201-3.

PT-SMA-1 is located on Bandelier Tuff and no run-on occurs from developed facilities (i.e., buildings, pavement, and parking lots); therefore, calculated storm water UTLs from locations containing sediments derived from Bandelier Tuff were compared with copper and gross-alpha MTAL and ATAL exceedances. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals. Copper is associated with minerals in the Bandelier Tuff as well.

- Copper—The copper UTL for storm water containing sediments derived from Bandelier Tuff is $3.43 \ \mu g/L$; the results from 2011 and 2014 are greater than this value.
- Gross alpha—The gross-alpha UTL for storm water containing sediments derived from Bandelier Tuff is 1490 pCi/L; the result from 2011 and one result from 2014 are less than this value. The other result from 2014 is greater than this value.

All the analytical results for these samples are reported in the 2011 and 2014 Annual Reports.

201.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at PT-SMA-1 during the 2014 season. These rain events triggered 9 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38720	5-29-2014
Storm Rain Event	BMP-39070	6-16-2014
Storm Rain Event	BMP-39353	6-30-2014
Storm Rain Event	BMP-40083	7-10-2014
Storm Rain Event	BMP-40471	7-28-2014
Storm Rain Event	BMP-41225	8-7-2014
Storm Rain Event	BMP-42049	8-18-2014
Storm Rain Event	BMP-42656	9-17-2014
Storm Rain Event	BMP-43146	10-8-2014
Annual Erosion Evaluation	COMP-43211	10-2-2014
TAL Exceedance	COMP-44000	10-2-2014

Table 201-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 201-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-40265	Removed matting from southeast end of berm 100203010026 and used berm fill to extend southeast end approximately 5 ft. Removed matting from northwest end of berm 100203010030 and used berm fill to extend northwest end approximately 5 ft. Applied seed and coconut matting to disturbed section of berms and new sections of berm.	7-18-2014	8 day(s)	Maintenance conducted as soon as practicable.
BMP-42093	Repaired spillway apron on berm 100203010027 by adding rock located upgradient of spillway. Extended middle spillway to the west.	8-26-2014	19 day(s)	Maintenance conducted as soon as practicable.

201.5 Compliance Status

The Sites associated with PT-SMA-1 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 201-4Compliance Status during 2014	Table 201-4	Compliance	Status	during 2014
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Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-004(f)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 10-7-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 10-04-2015.
SWMU 15-008(a)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 10-7-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 10-04-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 201-2 Inorganic analytical results summary plot for PT-SMA-1

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

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td used in ratio alculations	-	MQL	-	-	-	-	-	-	-	-	-	-		-	-	MQL	MTAL	ATAL	-	-	-	ATAL
alculations		5	-	-	-	-	-	-	-	-	-	-	-	-	-	5	19	200	-	-	-	20
std value	-			ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
td value	- ug/L	ug/L	ug/L	ug/L					-	-	-	-	-	-	-	10	10	0.287	-	-	-	0.287
		ug/L 1 0.2	ug/L - -	- -	-	-	-	-	-	-	-	-	-	-	-	2	0.53	0.001	-	-	-	0.014
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Figure 201-3 Organic analytical results summary plot for PT-SMA-1

135

202.0 PT-SMA-1.7: SWMU 15-006(a)

202.1 Site Descriptions

One historical industrial activity area is associated with IO03, PT-SMA-1.7: Site 15-006(a).

SWMU 15-006(a) is the PHERMEX firing site at TA-15 that consists of a firing chamber (structure 15-184) and related equipment. The PHERMEX firing site and associated facilities were built in the early 1960s. Past environmental surveys at the PHERMEX firing site include an aerial radiological survey conducted in 1982 that identified elevated levels of uranium-238. A 1991 surface radiation survey identified elevated contact exposure rates believed to be associated with chunks of DU at the PHERMEX firing site.

Investigation of SWMU 15-006(a) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order nature and extent sampling has not been conducted at the Site. However, Consent Order samples were collected in sediment catchment areas in the drainage downgradient of the Site to determine if contaminants are migrating from the Site. The migration of potential contaminants from SWMU 15-006(a) is limited to the drainage downgradient of the Site for most constituents and does not extend beyond Potrillo Canyon Reach PO-4. Detected concentrations of



inorganic and organic chemicals and radionuclides in Consent Order drainage samples were all below residential SSLs, except the single detection of arsenic, which was well below industrial SSL. Further Consent Order investigations are deferred until the firing site is no longer active.

The project map (Figure 202-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

202.2 Control Measures

There is minimal potential for run-on to the SMA. Any potential run-on would be in the form of sheet flow from impervious areas west of the SMA and would be dissipated in existing vegetation. The U-shaped mound in the center portion of the Permitted Feature controls runoff from the area. This configuration is part of the construction of the firing area. Enhanced controls also control runoff from the area. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 202-1).

Table 202-1 Active Control Measures

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
100302040017	Established Vegetation	-	Х	Х	-	В
100303010018	Earthen Berm	-	Х	-	Х	EC
100305040019	Gravel Infiltration Strip	-	Х	-	Х	EC
100306010020	Rock Check Dam	-	Х	-	Х	EC
100306010021	Rock Check Dam	-	Х	-	Х	EC
100306010022	Rock Check Dam	-	Х	-	Х	EC
100306010023	Rock Check Dam	-	Х	-	Х	EC
100306010024	Rock Check Dam	-	Х	-	Х	EC
100306010025	Rock Check Dam	-	Х	-	Х	EC
100306010026	Rock Check Dam	-	Х	-	Х	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

Enhanced controls were installed and certified on June 27, 2014, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environmental-stewardship/protection/compliance/individual-permit-stewardship/protection/compliance/individual-permit-stewardship/protection.php.

202.3 Storm Water Monitoring

SWMU 15-006(a) is monitored within PT-SMA-1.7. Following the installation of baseline control measures, a baseline confirmation sample was collected on September 10, 2012 (Figures 202-2 and 202-3). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 92.6 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 15-006(a):

 Alpha-emitting radionuclides are known to be associated with industrial materials historically managed at this Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for plutonium and uranium isotopes, which are alpha-emitting radionuclides. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 202-2 and 202-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 202-2 and 202-3.

Monitoring location PT-SMA-1.7 receives storm water run-on from industrially developed locations (PHERMEX firing site) areas as well as locations with sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

• Gross alpha—The gross-alpha background UTL for locations with sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2012 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2012 Annual Report.

202.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at PT-SMA-1.7 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38721	6-4-2014
Storm Rain Event	BMP-39071	6-17-2014
Storm Rain Event	BMP-39354	6-26-2014
Storm Rain Event	BMP-40084	7-10-2014
Storm Rain Event	BMP-40472	7-28-2014
Storm Rain Event	BMP-41226	8-11-2014
Storm Rain Event	BMP-42657	9-16-2014
Storm Rain Event	BMP-43147	10-6-2014
Annual Erosion Evaluation	COMP-43212	10-6-2014

Table 202-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 202-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-39563	Removed floatable debris between gravel infiltration strip 100305040019 and rock check dam 100306010024. Bagged debris and disposed of properly.	7-8-2014	12 day(s)	Maintenance conducted as soon as practicable.
BMP-41288	Installed a native rock check dam directly upgradient from the gravel infiltration strip 100305040019. Raked out rills in gravel strip 100305040019.	8-11-2014	14 day(s)	Maintenance conducted as soon as practicable.

202.5 Compliance Status

The Site associated with PT-SMA-1.7 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 15-006(a)	Corrective Action Initiated	Enhanced Control Corrective Action Monitoring	LANL, July 11, 2014, "Submittal of Certification of Installation of Enhanced Control Measures for Five Site Monitoring Areas (CDV-SMA-2.41, F-SMA-2, LA-SMA-5.51, PT-SMA-1.7, S-SMA-0.25)."







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 202-2 Inorganic analytical results summary plot for PT-SMA-1.7

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 202-3 Organic analytical results summary plot for PT-SMA-1.7

203.0 PT-SMA-2: SWMU 36-003(b) and AOCs 15-008(f) and 36-004(e)

203.1 Site Descriptions

Three historical industrial activity areas are associated with I004, PT-SMA-2: Sites 36-003(b), 15-008(f), and 36-004(e).

SWMU 36-003(b) is a decommissioned septic system located at the west end of TA-36. The septic system consists of a septic tank (structure 36-0061) and its associated drainlines and outfall. The septic tank sits near the edge of Mesita del Potrillo, approximately 100 ft southwest of building 36-0055, the control bunker for the I-J Firing Site. The control bunker housed the electronics and instrumentation used in the operation of the I-J Firing Site [SWMU 36-004(e)] and also contained a toilet, sink, and water fountain, all of which were connected to the septic tank via a 4-in.-diameter clay-tile pipe. The septic tank is constructed of reinforced concrete with a capacity of 420 gal. The tank has a buried overflow pipe that previously discharged near the north rim of Potrillo Canyon. The overflow pipe was capped in 1989 to stop its discharge into the canyon. After the overflow pipe was capped, the septic tank continued to be used until the early 1990s when the tank was taken out of service. During that time, the tank contents were periodically removed and taken to a sanitary WWTP for treatment and disposal. The contents of the SWMU 36-003(b) septic tank were sampled in 1981, and the analytical data confirmed HE was not present. The 1996 VCA implemented at SWMU 36-003(b) included removing the septic tank contents, pressure-washing the tank, and filling the tank with expanding cement. The contents of the tank were disposed of as LLW at TA-54, Area G, and at the TA-50 RLWTF; no confirmation samples were collected.

Phase I Consent Order sampling is complete for SWMU 36-003(b). All detected constituent concentrations were below residential SSLs and SALs. Nature and extent will be reevaluated under the supplemental investigation report for Potrillo-Fence Canyons Aggregate Area, scheduled to be submitted to NMED in 2015. It is anticipated this Site will be recommended for corrective action complete and will be eligible for a COC under the Consent Order upon approval of the report.

AOC 15-008(f) consists of several sand mounds located next to I-J Firing Site [AOC 36-004(e)] at TA-15. I-J Firing Site is located on a mesa overlooking Potrillo Canyon and was originally located in TA-15 when it was constructed in 1948 but is now part of TA-36.

Investigation of AOC 15-008(f) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order nature and extent sampling has not been conducted at the Site. However, Consent Order samples were collected in sediment catchment areas in the drainages downgradient of I-J Firing Site [AOC 36-004(e)], which includes AOC 15-008(f), to determine if contaminants are migrating from the Site. The migration of potential contaminants from AOCs 15-008(f) and 36-004(e) is limited to the drainage downgradient of the Site for most constituents and does not extend beyond Potrillo Canyon Reach PO-4. Detected contaminant concentrations in Consent Order drainage samples were below residential SSLs and SALs, except for uranium-238, which was detected above the residential SAL but below the industrial SAL in two samples from one location in the drainage downgradient of AOCs 15-008(f) and 36-004(e). Further Consent Order investigations are deferred until the firing site is no longer active.

AOC 36-004(e) is I-J Firing Site located at the west end of TA-36 on Mesita del Potrillo along the north rim of Potrillo Canyon. I-J Firing Site consists of two firing points (I and J) and the control building (36-0055). The Site was constructed in 1948 and was located in TA-15 until 1981 when the boundary of TA-36 was expanded to encompass the portion of TA-15 that contained the I-J Firing Site. Shots at I-J Firing Site used up to 500 lb of HE and involved a variety of solid and liquid explosives and inorganic chemicals. According to former employees, significant amounts of DU were used at I-J Firing Site in addition to small quantities of mercury and cadmium. Some shots were fired into iron, copper, or lead targets. Other metals used in shots included aluminum, antimony, various steels, lithium-magnesium alloys, and lithium hydride. In addition, hydrocarbons, argon, benzene, small amounts of mercury, cadmium, and beryllium were used in shots. All shots involving radioactive materials at I-J Firing Site were conducted in fully enclosed containment vessels. These vessels were removed from the I-J Firing Site for use at TA-15, although one was later returned to the I-J Firing Site. The returned vessel was identified in the 1990 SWMU report as AOC C-36-001 and was subsequently removed from the Site in 1994. Other activities conducted at I-J Firing Site included tests in which DU projectiles were fired into an embankment. This projectile test area was designated as AOC C-36-006(e).

Investigation of AOC 36-004(e) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order nature and extent sampling has not been conducted at the Site. However, Consent Order samples were collected in sediment catchment areas in the drainages downgradient of the Site to determine if contaminants are migrating from the Site. The migration of potential contaminants from AOC 36-004(e) is limited to the drainage downgradient of the Site for most constituents and does not extend beyond Potrillo Canyon Reach PO-4. Detected constituent concentrations in Consent Order drainage samples were below residential SSLs and SALs, except for uranium-238, which was detected above the residential SAL but below the industrial SAL in two samples from one location in the drainage downgradient of the Site. Further Consent Order investigations are deferred until the firing site is no longer active.

The project map (Figure 203-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

203.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 203-1).

Table 203-1Active Control Measures

		Purpose of Control				Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
100402040011	Established Vegetation	-	х	Х	-	В
100403010009	Earthen Berm	-	Х	-	х	СВ
100403120010	Rock Berm	х	-	-	х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

203.3 Storm Water Monitoring

SWMU 36-003(b) and AOCs 15-008(f) and 36-004(e) are monitored within PT-SMA-2. Following the installation of baseline control measures, a baseline storm water sample was collected on July 7, 2014 (Figures 203-2 and 203-3). Analytical results from this sample yielded the following TAL exceedances:

- Copper concentrations of 10.3 μ g/L (MTAL is 4.3 μ g/L) and
- Gross-alpha activity of 290 pCi/L (ATAL is 15 pCi/L).
Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 36-003(b):

- Copper is not known to have been associated with industrial materials historically managed at the Site. Copper was detected at a concentration equivalent to the BV in 1 of the 3 shallow (i.e., less than 3 ft bgs) 2011 Consent Order soil samples.
- Alpha-emitting radionuclides are not known to have been associated with industrial materials historically managed at the Site.

AOC 15-008(f):

- Copper is likely associated with industrial materials historically managed at the Site. Copper was detected above BVs in 4 of 20 shallow 2011 Consent Order samples at a maximum concentration 1.3 times the soil BV.
- Alpha-emitting radionuclides are known to have been associated with industrial materials
 historically managed at the Site. Shallow Consent Order samples were not analyzed for grossalpha radioactivity, but were analyzed for uranium isotopes, which are alpha-emitting
 radionuclides. Uranium-234, uranium-235/236, and uranium-238 were each detected above
 soil, sediment, and tuff BVs in 7, 6, and 11 of 20 shallow Consent Order samples, at maximum
 detected activities 24, 27, and 62 times the soil BVs, respectively. Alpha-emitting radionuclides
 managed by the Permittees are exempt from regulation under the CWA and are excluded from
 the definition of adjusted gross-alpha radioactivity.

AOC 36-004(e):

- Copper is known to have been associated with industrial materials historically managed at the Site. Copper was detected above BVs in 4 of 20 shallow 2011 Consent Order samples at a maximum concentration 1.3 times the soil BV.
- Alpha-emitting radionuclides are known to have been associated with industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for grossalpha radioactivity, but were analyzed for uranium isotopes, which are alpha-emitting radionuclides. Uranium-234, uranium-235/236, and uranium-238 were each detected above soil, sediment, and tuff BVs in 7, 6, and 11 of 20 shallow Consent Order samples, at maximum detected activities 24, 27, and 62 times the soil BVs, respectively. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 203-2 and 203-3. UTLs developed for urban settings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 203-2 and 203-3.

Monitoring location PT-SMA-2 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2014 is between these two values.
- Gross alpha—Gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and gross-alpha background storm water UTL for storm water runon from a developed urban landscape is 32.5 pCi/L. The 2014 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2014 Annual Report.

203.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at PT-SMA-2 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38722	5-30-2014
Storm Rain Event	BMP-39072	6-16-2014
Storm Rain Event	BMP-39355	6-26-2014
Storm Rain Event	BMP-40085	7-22-2014
Storm Rain Event	BMP-41077	8-7-2014
Storm Rain Event	BMP-42051	8-18-2014
Storm Rain Event	BMP-42658	9-17-2014
Storm Rain Event	BMP-43148	10-7-2014
Annual Erosion Evaluation	COMP-43213	10-6-2014
TAL Exceedance	COMP-42717	10-6-2014

Table 203-2Control Measure Inspections during 2014

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Maintenance activities conducted at the SMA are summarized in the following table.

Table 203-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-42273	Added native rock to spillway apron on berm 100403010009 to address erosion. Repaired elk tracks on west section of berm using hand tools. Reapplied seed and matting to repaired area(s).	8-27-2014	9 day(s)	Maintenance conducted as soon as practicable.

203.5 Compliance Status

The Sites associated with PT-SMA-2 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 15-008(f)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-11-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 09-06-2015.
SWMU 36-003(b)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-11-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 09-06-2015.
AOC 36-004(e)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-11-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 09-06-2015.

Table 203-4Compliance Status during 2014

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.







Figure 203-2 Inorganic analytical results summary plot for PT-SMA-2



Figure 203-3 Organic analytical results summary plot for PT-SMA-2

150

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

204.0 PT-SMA-2.01: AOCs C-36-001 and C-36-006(e)

204.1 Site Descriptions

Two historical industrial activity areas are associated with I004A, PT-SMA-2.01: Sites C-36-001 and C-36-006(e).

AOC C-36-001 is a former containment vessel that provided secondary containment for explosives tests at TA-36. The containment vessel was manufactured in 1970 and located at the PHERMEX test facility at TA-15. The containment vessel was later relocated to the I-J Firing Site and placed south of building 36-55, where it remained until 1983 when it was removed. The containment vessel consisted of a 19.5-ton steel sphere that was 12 ft in diameter. An explosive device was placed and detonated in a primary containment vessel which, in turn, was placed inside the AOC C-36-001 containment vessel. The explosion gases were vented through a filtration system that captured particulates and did not allow release of the test material. No specific location(s) exists for this Site; the location is identified only as the general area south of building 36-55. In 1994, a VCA was implemented at AOC C-36-001 that involved decontamination and disposal of the vessel. The vessel was taken from TA-36 to building 15-233 for initial decontamination and was subsequently taken to the decontamination facility at TA-50 for further decontamination. It was then returned to TA-15 pending acceptance for disposal at TA-54, Area G. In October 1994, the containment vessel was disposed of at MDA G at TA-54. No confirmation samples were collected during the VCA.

The previous location(s) of the former containment vessel used at PHERMEX and the I-J Firing Site are not known and would have been impacted by historical and current firing site operations. Therefore, characterization of any releases from AOC C-36-001 will be accomplished by future investigations at the PHERMEX and I-J Firing Site. Investigation of both of these firing sites is deferred per Table IV-2 of the Consent Order.

AOC C-36-006(e) is a former projectile test area located within the southern portion of the I-J Firing Site [AOC 36-004(e)] along the north rim of Potrillo Canyon. AOC C-36-006(e) was formerly used for testing DU projectiles as part of I-J Firing Site activities. Projectiles were fired from a 120-mm gun into a nearby embankment. Although some projectiles were recovered after an experiment was completed, much of the projectile material remains on-site. Originally, the I-J Firing Site was located within the boundary of TA-15. In 1981, the boundary of TA-36 was expanded to include portions of TA-15. As part of this expansion, the area where I-J Firing Site was located was transferred to TA-36. Although the 1990 SWMU report addresses the I-J Firing Site as AOC 36-004(e), it addresses the nearby projectile test area (which was also part of the 1981 transfer to TA-36) as AOC 15-006(e). AOC 15-006(e) was renamed AOC C-36-006(e) in the OU 1086 work plan because the projectile test area was within the boundaries of TA-36 when the work plan was written.

Previous investigations conducted at I-J Firing Site, which encompasses AOC C-36-006(e), consisted of a surface radiological survey conducted in 1991 that identified areas of elevated radioactivity at the time of the survey. Numerous pieces of DU and oxidized DU were present around the site. Based on the presence of visible pieces of DU, an interim action plan was prepared in 1997 that called for removing visible pieces of DU from the firing site and surrounding area and installing storm water controls. However, the plan was never implemented.

AOC C-36-006(e) is encompassed by the I-J Firing Site, which is deferred for investigation per Table IV-2 of the Consent Order. However, Consent Order samples were collected in sediment catchment areas in the drainages downgradient of the Site to determine if contaminants are migrating from the Site, which

includes the I-J Firing Site. Concentrations of detected inorganic chemicals and organic chemicals and radionuclide activities decreased in the drainages downgradient of the Site and were not detected or not detected above BVs in samples collected from the bottom of the drainage below the Site. All detected concentrations and activities are below residential SSLs and SALs.

The project map (Figure 204-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

204.2 Control Measures

There are no run-on issues with this Permitted Feature. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 204-1).

Enhanced controls were installed and certified on August 3, 2012, and submitted to EPA on August 27, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 204-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
I004A02040005	Established Vegetation	-	х	х	-	В
I004A03010004	Earthen Berm	-	Х	-	Х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

204.3 Storm Water Monitoring

AOCs C-36-001 and C-36-006(e) are monitored within PT-SMA-2.01. Following the installation of baseline control measures, a baseline confirmation sample was collected on August 18, 2011 (Figures 204-2 and 204-3). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 295 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

AOC C-36-001:

• Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. Consent Order sampling has not been conducted; the location of the former containment vessel is not known.

AOC C-36-006(e):

• Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. Consent Order sampling has not been conducted; the location of the former containment vessel is not known.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 204-2 and 204-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 204-2 and 204-3.

The SMA receives runoff from industrially developed (PHERMEX and I-J Firing Sites) areas and undeveloped areas. The concentration gross-alpha radioactivity detected in the SMA sample was above the BV for runoff from developed areas and below the BV for runoff from undeveloped areas. These results are consistent with the land use within the SMA drainage area.

All the analytical results for these samples are reported in the 2011 Annual Report.

204.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at PT-SMA-2.01 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38723	5-30-2014
Storm Rain Event	BMP-39073	6-16-2014
Storm Rain Event	BMP-39356	6-26-2014
Storm Rain Event	BMP-40086	7-22-2014
Storm Rain Event	BMP-41078	8-7-2014
Storm Rain Event	BMP-42052	8-18-2014
Storm Rain Event	BMP-42659	9-17-2014
Storm Rain Event	BMP-43149	10-7-2014
Annual Erosion Evaluation	COMP-43214	10-6-2014

Table 204-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at PT-SMA-2.01 in 2014.

204.5 Compliance Status

The Sites associated with PT-SMA-2.01 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC C-36-001	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 08-03-2012.
AOC C-36-006(e)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 08-03-2012.

Table 204-3Compliance Status during 2014







Figure 204-2 Inorganic analytical results summary plot for PT-SMA-2.01

155



Figure 204-3 Organic analytical results summary plot for PT-SMA-2.01

156

205.0 PT-SMA-3: SWMU 36-006 and AOC 36-004(a)

205.1 Site Descriptions

Two historical industrial activity areas are associated with IO05, PT-SMA-3: Sites 36-006 and 36-004(a).

SWMU 36-006 consists of a former surface disposal area that was located on the southern slope of Potrillo Canyon, approximately 600 ft north of the Eenie Firing Site [AOC 36-004(a)] at TA-36. SWMU 36-006 was used from 1955 to 1970 to dispose of cables, metal, concrete, and other similar debris from the TA-36 firing sites. The debris covered an area approximately 75 ft wide that extended approximately 100 ft down the south canyon slope. The remainder of the debris was scattered laterally 300 ft along the south canyon slope. This debris was dumped into the canyon from trucks on the canyon rim. Although the TA-36 firing sites were still active, SWMU 36-006 was not used as a surface disposal area after 1996. Firing site personnel removed most of the debris between 1999 and 2006. All remaining debris was removed from the SWMU 36-006 surface disposal area during the 2010 Consent Order investigation.

Phase I Consent Order sampling is complete for SWMU 36-006. All detected constituents in Consent Order confirmation samples were below residential SSLs and SALs. SWMU 36-006 will be recommended for corrective action complete in the supplemental investigation report for Potrillo and Fence Canyons Aggregate Area, to be submitted to NMED in 2015. SWMU 36-006 will be eligible for a COC upon approval of the report by NMED.

AOC 36-004(a) is the active Eenie Firing Site located at TA-36 on Mesita del Potrillo on the rim of Potrillo Canyon. AOC 36-004(a) consists of the impact area, a control bunker (building 36-0003), and a make-up building (36-0004) that contains a storage area. Construction of the Eenie Firing Site began in 1949 and was completed in 1951. Materials used in experimental shots include lead oxide, mercury, copper, nickel, brass, DU, and nitroglycerine. Other activities conducted at the Site include shoulder-mounted projectiles fired into targets in the southern portion of the firing site.

Investigation of AOC 36-004(a) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order nature and extent sampling has not been conducted at the Site. However, Consent Order samples were collected in sediment catchment areas in the drainage downgradient of the Site to determine if contaminants are migrating from the Site. The migration of potential contaminants from AOC 36-004(a) is limited to the drainage below AOC 36-004(a) for most constituents and does not extend beyond Potrillo Canyon Reach PO-4. All detected constituents in samples collected in the drainage downgradient of AOC 36-004(a) were below residential SSLs and SALs. Further Consent Order investigations are deferred until the firing site is no longer active.

The project map (Figure 205-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

205.2 Control Measures

Run-on to this Permitted Feature may originate from the unpaved access road located in the southern portion of the area. Natural channels divert a portion of this potential run-on influence to the west away from the SMA. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 205-1).

			D	60 1		
			Purpose of Control			Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
100502040009	Established Vegetation	-	х	Х	-	В
100503020008	Base Course Berm	х	-	-	Х	В
100503060013	Straw Wattle	х	-	-	Х	В
100503060017	Straw Wattle	х	-	-	Х	В
100503060018	Straw Wattle	Х	-	-	Х	В
100503120015	Rock Berm	Х	-	-	Х	В
100504030016	Rock Channel/Swale	Х	-	Х	-	В
100504040005	Culvert	Х	-	Х	-	CB
100504060004	Rip Rap	Х	-	Х	-	CB
100504060007	Rip Rap	Х	-	Х	-	В
100506010006	Rock Check Dam	-	х	-	Х	СВ
100506010019	Rock Check Dam	-	х	-	Х	В
100506010020	Rock Check Dam	-	х	-	Х	В
100506010021	Rock Check Dam	Х	-	-	Х	В
100506010022	Rock Check Dam	Х	-	-	Х	В
100506010023	Rock Check Dam	Х	-	-	Х	В
100506010024	Rock Check Dam	Х	-	-	Х	В
100506010025	Rock Check Dam	Х	-	-	Х	В
100506010026	Rock Check Dam	х	-	-	Х	В
100506010027	Rock Check Dam	х	-	-	Х	В

Table 205-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

205.3 Storm Water Monitoring

SWMU 36-006 and AOC 36-004(a) are monitored within PT-SMA-3. Following the installation of baseline control measures, a baseline storm water sample was collected on July 15, 2014 (Figures 205-2 and 205-3). Analytical results from this sample yielded the following TAL exceedance:

• Gross-alpha activity of 548 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 36-006:

• Alpha-emitting radionuclides are not known to have been associated with industrial materials historically managed at the Site.

SWMU 36-004(a):

• Alpha-emitting radionuclides are not known to have been associated with industrial materials historically managed at the Site.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 205-2 and 205-3. UTLs developed for urban settings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 205-2 and 205-3.

Monitoring location PT-SMA-3 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

 Gross alpha—Gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and gross-alpha background storm water UTL for storm water runon from a developed urban landscape is 32.5 pCi/L. The 2014 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2014 Annual Report.

205.4 Inspections and Maintenance

RG267.4 recorded nine storm events at PT-SMA-3 during the 2014 season. These rain events triggered five post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-39364	6-26-2014
Storm Rain Event	BMP-39684	7-16-2014
Storm Rain Event	BMP-40827	8-1-2014
Storm Rain Event	BMP-42443	9-9-2014
Storm Rain Event	BMP-43157	10-7-2014
Annual Erosion Evaluation	COMP-43215	10-2-2014
TAL Exceedance	COMP-42745	10-2-2014

Table 205-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 205-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-34636	Built up height and extended both ends of rock check dam 100506010006 with angular rock. Raked out rills on slope below riprap 100504060004. Added angular rock to extend riprap area down the slope to the northeast and to the southwest edge of riprap area.	3-25-2014	232	Maintenance was scheduled to be completed in late summer of 2013 and was delayed by staffing resource limitations. Site conditions changed as a result of the September 2013 1000-yr rain event, and maintenance was delayed by the federal government shutdown and the onset of winter weather conditions.
BMP-40713	Installed additional straw wattles against existing wattle I00503060011 on the downgradient side. Installed additional straw wattles on top of existing wattle I00503060012.	7-31-2014	15 day(s)	Maintenance conducted as soon as practicable.
BMP-40827	Repaired rock check dam 100506010006 at inspection.	8-1-2014	0 day(s)	Maintenance conducted as soon as practicable.
BMP-41931	Removed wattle 100503060014 from around drop inlet. Reinstalled wattles at top and toe of island slope. Installed rock berm between trees on north side of guard rail. Installed 9 rock check dams. Lined channel with angular rock. Applied seed to both islands and lightly raked in.	9-4-2014	34 day(s)	Maintenance delayed
BMP-42993	Trenched in wattle and restaked. Lowered center of check dam to create spillway. Used extra rock to extend south end.	9-25-2014	21 day(s)	Maintenance conducted as soon as practicable.
BMP-43260	Modified berm 100503020008 by adding base course to extend berm approximately 15 ft northwest. Modified riprap 100504060007 by adding angular rock to west end of riprap area to merge with riprap 100504060004. Repaired minor rilling by track-walking the area and applying seed and matting on small slope west of 36-004(a) and north of berm 100503020008.	10-16-2014	14 day(s)	Maintenance conducted as soon as practicables.

205.5 Compliance Status

The Sites associated with PT-SMA-3 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 205-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 36-004(a)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-25-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 07-12-2015.
SWMU 36-006	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-25-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 07-12-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.





162



Figure 205-2 Inorganic analytical results summary plot for PT-SMA-3



Figure 205-3 Organic analytical results summary plot for PT-SMA-3

164

206.0 PT-SMA-4.2: SWMU 36-004(d)

206.1 Site Descriptions

One historical industrial activity area is associated with IO07, PT-SMA-4.2: Site 36-004(d).

SWMU 36-004(d) consists of the active Lower Slobbovia Firing Site and the inactive Skunk Works Firing Site, located in Potrillo Canyon, and three former burn pits located on the mesa top above Potrillo Canyon at TA-36. The Lower Slobbovia Firing Site consists of two active firing points and a control building (36-0012). One of the firing points (structure 36-0013) was constructed in 1950 and is located on top of an approximately 200-ft-diameter sand and dirt pad. The control building (36-0012) was constructed into the side of the pad. The second firing point consisted of a wooden tower (structure 36-0120) constructed in 1986 at the northwest end of a 1000-ft-long sled track for conducting drop tests. Shots fired at the Lower Slobbovia Firing Site primarily involved HE. Less than 2% of the shots involved significant amounts of metal (e.g., DU, lead, copper, aluminum, and steel). The largest shot fired at Lower Slobbovia used 5000 to 6000 lb of HE. In addition, underground tests, buried to approximately 100 ft, were conducted at this Site.

The Skunk Works Firing Site, located approximately 0.5 mi northwest of the Lower Slobbovia Firing Site, was used to conduct small-explosives experiments during the 1950s. These experiments involved gas (acetylene and oxygen), liquid (tetranitromethane), and solid explosives. Beryllium and radioactive materials were not used at the Site. Structures at the Skunk Works Firing Site included a 5- × 5.5- × 5-ft belowgrade structure that previously served as a battery storage room and two buildings (36-0044 and 36-0045) that were moved to the Site from TA-15. All the structures have been removed. The Skunk Works firing pad was located next to building 36-0045. A shallow depression, located approximately 100 ft farther up the canyon, was also used as a firing pad. The burn pits were used for burning and disposal of test debris before MDA AA (SWMU 36-001) was established in the mid-1960s. These pits are located on Mesita del Potrillo approximately 4000 ft west of the Lower Slobbovia control building (36-0012). The largest pit is a bermed enclosure located north of Potrillo Road and is approximately 40 ft in diameter. Two smaller areas are located south of Potrillo Road. Debris was transported by truck from TA-36 firing sites to the pits, placed in the pits, and burned. The debris consisted of wood, nails, other metal fragments, plastics, and sand contaminated with barium, uranium, and HE.

Investigation of SWMU 36-004(d) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order nature and extent sampling has not been conducted at the Site. However, Consent Order samples were collected in sediment catchment areas in the drainages downgradient of all portions of the Site to determine if contaminants are migrating from the Site. The migration of potential contaminants from SWMU 36-004(d) is limited to the drainages below SWMU 36-004(d) for most constituents and does not extend beyond Potrillo Canyon Reach PO-4 or Fence Canyon Reach F-3. All detected constituents in samples collected in drainages downgradient of SWMU 36-004(d) were below residential SSLs and SALs. Further Consent Order investigations are deferred until the firing site is no longer active.

The project map (Figure 206-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

206.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 206-1).

Table 206-1 Active Control Measures

			Purpose of Control			Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
100702040008	Established Vegetation	-	Х	Х	-	В
100703120007	Rock Berm	-	Х	-	Х	В
100703120009	Rock Berm	-	х	-	Х	В
100704040005	Culvert	Х	-	Х	-	СВ
100704060002	Rip Rap	-	Х	Х	-	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

206.3 Storm Water Monitoring

SWMU 36-004(d) is monitored within PT-SMA-4.2. Following the installation of baseline control measures, a baseline storm water sample was collected on July 2, 2014 (Figures 206-2 and 206-3). Analytical results from this sample yielded the following TAL exceedances:

- Gross-alpha activity of 393 pCi/L (ATAL is 15 pCi/L) and
- Radium-226 and radium-228 activity of 95.9 pCi/L (ATAL is 30 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 36-004(d):

 Alpha-emitting radionuclides may have been associated with industrial materials historically managed at the Site. However, radium-226 and radium-228 are not known to be associated with industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity or radium isotopes but were analyzed for uranium isotopes, which are alpha-emitting radionuclides. Uranium-238 was detected above the soil BV in 1 of 24 shallow (i.e., less than 3 ft bgs) 2011 Consent Order and 1996 RFI soil and sediment samples at a detected activity 1.2 times the soil BV. Alpha-emitting radionuclides managed by the Permittees are exempt from regulation under the CWA and are excluded from the definition of adjusted gross-alpha radioactivity.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 206-2 and 206-3. UTLs developed for urban settings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 206-2 and 206-3.

Monitoring location PT-SMA-4.2 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

- Gross alpha—Gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and gross-alpha background storm water UTL for storm water runon from a developed urban landscape is 32.5 pCi/L. The 2014 gross-alpha result is between these two values.
- Radium-226 and Radium-228— Radium-226 and radium-228 UTL for background storm water containing sediment derived from Bandelier Tuff is 52.7 pCi/L, and radium-226 and radium-228 background storm water UTL for storm water run-on from a developed urban landscape is 8.94 pCi/L. The 2014 radium-226 and radium-228 result is greater than both of these values.

All the analytical results for these samples are reported in the 2014 Annual Report.

206.4 Inspections and Maintenance

RG267.4 recorded nine storm events at PT-SMA-4.2 during the 2014 season. These rain events triggered six post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-39365	6-26-2014
Storm Rain Event	BMP-39685	7-17-2014
Storm Rain Event	BMP-40828	7-30-2014
Storm Rain Event	BMP-41619	8-14-2014
Storm Rain Event	BMP-42444	9-9-2014
Storm Rain Event	BMP-43158	10-8-2014
Annual Erosion Evaluation	COMP-43216	10-6-2014
TAL Exceedance	COMP-42720	10-6-2014

Table 206-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 206-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37287	Installed angular rock to continue rock berm on the south edge of rip rap 100704060002 for approx. 10ft. Added angular rock to rip rap 100704060002 area to extend to the south and east. Added angular rock to rock berm 100703120007 to build up height on east end adjacent to rip rap 100704060002.	5-12-2014	180 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

206.5 Compliance Status

The Site associated with PT-SMA-4.2 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 206-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 36-004(d)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-11-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 11-01-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED



Figure 206-2 Inorganic analytical results summary plot for PT-SMA-4.2

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE** VALLE WATERSHED



Figure 206-3 Organic analytical results summary plot for PT-SMA-4.2

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

207.0 W-SMA-1: SWMUs 16-017(j)-99, 16-026(v), and 16-026(c2)

207.1 Site Descriptions

Three historical industrial activity areas are associated with W001, W-SMA-1: Sites 16-017(j)-99, 16-026(v), and 16-026(c2).

SWMU 16-017(j)-99 is a former HE magazine (structure 16-63) at TA-16. The magazine was a 24- × 26- × 9-ft wood-framed structure surrounded by an earthen berm on three sides and the top. The magazine was built in 1945 to store HE and was removed in 1998. This SWMU was originally designated as part of SWMU 16-017, a group of 24 structures in central TA-01. In 1999, SWMU 16-017 was separated into 24 SWMUs, each consisting of a single structure.

Consent Order sampling has not yet been conducted at SWMU 16-017(j)-99; the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. No investigations were conducted at the Site before the Consent Order went into effect in 2005.

SWMU 16-026(v) is a former NPDES-permitted outfall (05A072) that served decommissioned analytical chemistry laboratory building 16-460 at TA-16. The outfall is located approximately 60 ft southeast of the building and received effluent from a sump [SWMU 16-003(c)], building floor drains, steam-cup drains, sink drains, and a drinking fountain. The outfall was plugged in 1992. It was removed from the NPDES permit effective September 19, 1997.

Consent Order sampling has not yet been conducted at SWMU 16-026(v); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. However, decision-level data are available from the 1995 RFI.

SWMU 16-026(c2) is consists of the two outfalls that served chemical storage building 16-462 at TA-16. The outfalls are located approximately 30 ft southeast of the building. Floor troughs within 16-462 drain to 6-in.-diameter VCP drainlines that exit the south and southeast side of the building. Effluent flowed from the drainlines southeast to a drainage ditch. Building 16-462 was built in 1952 to store chemicals for use in the analytical chemistry laboratory (building 16-460). All drains at building 16-462 were plugged in 1991. There is no record of chemical spills in building 16-462.

Consent Order sampling has not yet been conducted at SWMU 16-026(c2); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. No investigations were conducted at the Site before the Consent Order went into effect in 2005.

The project map (Figure 207-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

207.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 207-1). Enhanced controls were installed and certified on June 4, 2013, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environmental-stewardship/protection/compliance/individual-permit-stewardship/protection/compliance/individual-permit-stewardship/protection.php.

Table 207-1 Active Control Measures

			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W00102040019	Established Vegetation	-	Х	Х	-	В
W00103010014	Earthen Berm	Х	-	-	Х	EC
W00103010015	Earthen Berm	Х	-	-	Х	EC
W00104060011	Rip Rap	Х	-	Х	-	CB
W00104060017	Rip Rap	-	Х	Х	-	EC
W00105030016	Sand Filter	-	Х	-	Х	EC
W00106010008	Rock Check Dam	-	Х	-	Х	CB
W00106010012	Rock Check Dam	Х	-	-	Х	EC
W00106010013	Rock Check Dam	Х	-	-	Х	EC
W00108020018	Rock Cap	-	-	Х	-	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

207.3 Storm Water Monitoring

SWMUs 16-017(j)-99, 16-026(c2), and 16-026(v) are monitored within W-SMA-1. Following the installation of baseline control measures, two baseline storm water samples were collected on August 3, 2011, and September 9, 2011 (Figure 207-2). Analytical results from these samples yielded the following TAL exceedances:

- Aluminum concentrations of 918 μg/L and 1410 μg/L (MTAL is 750 μg/L) and
- Gross-alpha activity of 50.7 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at W-SMA-1, a corrective action storm water sample was collected on September 12, 2013 (Figure 207-2). Analytical results from this corrective action monitoring sample yielded the following TAL exceedances:

- Aluminum concentration of 1010 μg/L (MTAL is 750 μg/L) and
- Gross-alpha activity of 314 pCi/L (ATAL is 15 pCi/L).

A second corrective action storm water sample was collected on July 19, 2914 (Figure 207-2). Analytical results from this corrective action monitoring sample yielded the following TAL exceedances:

- Aluminum concentration of 858 μg/L (MTAL is 750 μg/L) and
- Copper concentrations of 4.45 µg/L (MTAL is 4.3 µg/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-017(j)-99:

• Aluminum is not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.

- Copper is not known to be associated with industrial materials historically managed at the Site. Consent Order investigations have not been performed at SWMU 16-017(j)-99; no decision-level data are available for this Site.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.

SWMU 16-026(c2):

- Aluminum is not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.
- Copper is not known to be associated with industrial materials historically managed at the Site. Consent Order investigations have not been performed at SWMU 16-026(c2); no decision-level data are available for this Site.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.

SWMU 16-026(v):

- Aluminum is not known to be associated with industrial materials historically managed at this Site. Aluminum was detected in 1 of 9 shallow RFI samples at a concentration equivalent to the tuff BV.
- Copper is not known to be associated with industrial materials historically managed at the Site. Copper was detected in 7 of 9 shallow RFI samples at a maximum concentration 36.8 times the sediment BV. There are no other outfalls within the SMA and no documented source of copper.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. Shallow RFI samples were not analyzed for gross-alpha radioactivity or alpha-emitting radionuclides because they are not potential contaminants at this Site.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 207-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 207-2.

Monitoring location W-SMA-1 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Metals including aluminum and copper are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

 Aluminum—The aluminum UTL for storm water containing sediments derived from Bandelier Tuff is 2210 μg/L, and the aluminum background storm water UTL for storm water run-on from a developed urban landscape is 245 μg/L. The two results from 2011 and the result from 2013 are between these values.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2014 is between these two values.
- Gross alpha—The gross-alpha UTL for storm water containing sediments derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The result from 2013 is between these two values and the geometric mean of both gross-alpha results from 2011 is below both of these values.

All the analytical results for these samples are reported in the 2011, 2013, and 2014 Annual Reports.

207.4 Inspections and Maintenance

RG253 recorded two storm events at W-SMA-1 during the 2014 season. These rain events triggered one post-storm inspection. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40788	7-31-2014
Annual Erosion Evaluation	COMP-43217	10-2-2014
TAL Exceedance	COMP-42742	10-2-2014

Table 207-2 Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 207-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-43669	Repaired TRM matting on the berm end nearest the road on the road side of berm W00103010014.	10-29-2014	27 day(s)	Maintenance conducted as soon as practicable.

207.5 Compliance Status

The Sites associated with W-SMA-1 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 207-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-017(j)-99	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	The Permittees plan to certify enhanced controls.
SWMU 16-026(c2)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 8-29-2014. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-026(v)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 8-29-2014. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.





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Exceedance Ratio(Result / TAL)		Ц		△					_		÷		\$	\$	Δ		♦	△	\$	
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		Aluminum	Antimony	Arsenic	Boron	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc	Cyanide, weak acid dissociable	Gross alpha	Radium-226 and Radium-228
std used in ratio																				
alculations		MTAL 750	ATAL 640	ATAL 9	ATAL 5000	MQL 1	MTAL 210	ATAL 1000	MTAL 4.3	MTAL 17	ATAL 0.77	MTAL 170	ATAL 5	MQL 0.5	ATAL 6.3	ATAL 100	MTAL 42	MQL 0.01	ATAL 15	ATAL 30
unit		ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	mg/L	pCi/L	pCi/L
7/19/2014 resu	lt	858	3	5	17.5	1	10	1.22	4.45	0.805	0.1	2	5	1	2	2.36	10	0.005	8.13	1.81
res	ult / TAL	1.1	0.005	0.56	0.0035	1	0.048	0.0012	1	0.047	0.13	0.012	1	2	0.32	0.024	0.24	0.5	0.54	0.06
9/12/2013 resu		1010	3	5	18.8	1	10	1.45	4.01	0.806	0.124	2.28	5	1	2	5.01	12.8	0.005	314	0.953
	ult / TAL	1.3	0.005	0.56	0.0038	1	0.048	0.0014	0.93	0.047	0.16	0.013	1	2	0.32	0.05	0.3	0.5	21	0.032
9/9/2011 result		1410	1	1.7	15	0.11	2	3.7	3.6	0.68	0.066	1.6	1.5	0.2	0.45	3.2	18.2	0.002	6.78	1.05
res	ult / TAL	1.9	0.002	0.19	0.003	0.11	0.01	0.0037	0.84	0.04	0.086	0.0094	0.3	0.4	0.071	0.032	0.43	0.15	0.45	0.035
0/0/0044						0.00					0.000				0.45	0.0	40.0			
8/3/2011 result	t sult / TAL	918 1.2	1 0.002	1.7 0.19	15 0.003	0.11 0.11	2.2 0.01	2.4 0.0024	3.8 0.88	1.1 0.065	0.066 0.086	1.6 0.0094	1.5 0.3	0.2 0.4	0.45 0.071	2.6 0.026	18.9 0.45	0.002 0.15	50.7 3.4	2.59 0.086

Figure 207-2 Inorganic analytical results summary plot for W-SMA-1

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

208.0 W-SMA-1.5: SWMUs 16-026(b2) and 16-028(d)

208.1 Site Descriptions

Two historical industrial activity areas are associated with W002, W-SMA-1.5: Sites 16-026(b2) and 16-028(d).

SWMU 16-026(b2) is an outfall that served decommissioned small-machine (millwright) shop located in room 138 of building 16-202 at TA-16. The outfall is located approximately 135 ft southeast of building 16-202 and daylighted in the drainage ditch along Anchor Ranch Road. The outfall received overflow from an oil/water separator, which consisted of a 3- × 3- × 3-ft cement pit located below floor level. The separator was installed in 1952, when building 16-202 was built, and remains in place. By 1977, room 138 was no longer used as shop and use of the separator ceased. The building has been used for administrative offices since 1995.

Consent Order sampling has not yet been conducted at SWMU 16-026(b2); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. No investigations were conducted at the Site before the Consent Order went into effect in 2005.

SWMU 16-028(d) is a former NPDES-permitted outfall (04A083) located at TA-16, approximately 80 ft southeast of building 16-202. The outfall formerly served a decommissioned machine shop in building 16-202 and connected to the building through an 8-in.-diameter VCP. The outfall received noncontact cooling water and wash water from two floor drains, effluent from two non-HE sumps, discharge from two sink drains, and rainwater from 16 roof drains. In 1995, building 16-202 was converted to office space, and the drainlines within the building were modified so the outfall receives only storm water from the building's roof drains. The outfall was removed from the NPDES permit effective September 19, 1997.

Consent Order sampling has not yet been conducted at SWMU 16-028(d); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. No investigations were conducted at the Site before the Consent Order went into effect in 2005.

The project map (Figure 208-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

208.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 208-1).

Enhanced controls were installed and certified on September 25, 2012, and submitted to EPA on October 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 200-1 Active Control Measures	Table 208-1	Active Control Measures
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			Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W00202040017	Established Vegetation	-	х	Х	-	В
W00203010015	Earthen Berm	-	х	-	Х	EC
W00203060005	Straw Wattle	Х	-	-	Х	СВ
W00203060018	Straw Wattle	Х	-	-	Х	В
W00204060007	Rip Rap	-	х	Х	-	СВ
W00204070002	Vegetated Swale	-	х	Х	-	СВ
W00204070003	Vegetated Swale	-	х	Х	-	СВ
W00205020013	Sediment Basin	-	х	-	Х	EC
W00205020014	Sediment Basin	-	х	-	Х	EC
W00206010008	Rock Check Dam	Х	-	-	Х	СВ
W00206010009	Rock Check Dam	Х	-	-	Х	СВ
W00206010010	Rock Check Dam	-	х	-	Х	СВ
W00206010011	Rock Check Dam	-	х	-	Х	СВ
W00206010016	Rock Check Dam	-	х	-	Х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

208.3 Storm Water Monitoring

SWMUs 16-026(b2) and 16-028(d) are monitored within W-SMA-1.5. Following the installation of baseline control measures, two baseline storm water samples were collected on August 3, 2011, and September 1, 2011 (Figure 208-2). Analytical results from these samples yielded the following TAL exceedances:

- Copper concentration of 9.7 μg/L (MTAL is 4.3 μg/L),
- Zinc concentration of 49.3 μ g/L (MTAL is 42 μ g/L), and
- Gross-alpha activity of 22 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at W-SMA-1.5, a corrective action storm water sample was collected on July 19, 2014 (Figure 208-2). Analytical results from this corrective action monitoring sample yielded the following TAL exceedance:

• Copper concentration of 6.9 μ g/L (MTAL is 4.3 μ g/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-026(b2):

• Copper may have been associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.
Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.

SWMU 16-028(d):

- Copper may have been associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.
- Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.



TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 208-2. UTLs developed for urban settings were derived from runoff from

developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 208-2.

Monitoring location W-SMA-1.5 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles.

 Copper—The copper UTL for storm water containing sediments derived from Bandelier Tuff is 3.43 µg/L, and the copper background storm water UTL for storm water run-on from a developed urban landscape is 32.3 µg/L. One result from 2011 and the 2014 result are between these values, and the second 2011 result is below both values.

All the analytical results for these samples are reported in the 2011 and 2014 Annual Reports.

208.4 Inspections and Maintenance

RG253 recorded two storm events at W-SMA-1.5 during the 2014 season. These rain events triggered one post-storm inspection. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40789	7-31-2014
Annual Erosion Evaluation	COMP-43218	10-2-2014
TAL Exceedance	COMP-44653	10-2-2014

Table 208-2 Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 208-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37139	Removed matting from damaged areas of earthen berm W00203010015. Added clean fill and compact. Applied seed and matting to repaired areas.	3-26-2014	147 day(s)	Maintenance was initiated as a result of inspections conducted during winter weather conditions.
BMP-41658	Installed new straw wattle directly upgradient of existing wattle W00203060004 as a replacement.	8-14-2014	14 day(s)	Maintenance conducted as soon as practicable.

208.5 Compliance Status

The Sites associated with W-SMA-1.5 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 208-4	Compliance Status during 2014
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Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-026(b2)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 8-28-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 10-22-2015.
SWMU 16-028(d)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 8-28-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 10-22-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 208-2 Inorganic analytical results summary plot for W-SMA-1.5

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

209.0 W-SMA-2.05: SWMU 16-028(e)

209.1 Site Descriptions

One historical industrial activity area is associated with W003, W-SMA-2.05: Site 16-028(e).

SWMU 16-028(e) is a formerly NPDES-permitted outfall (04A091) that served materials testing laboratory building 16-450 at TA-16. The outfall was located southeast of building 16-450 and received discharges through a drainline from an HE sump [SWMU 16-029(g)]. The outfall discharged outside the security fence at the edge of Water Canyon. The sump was removed in 1997, and the drainline to the outfall was plugged but left in place. The outfall was removed from the NPDES permit effective September 19, 1997.

Consent Order sampling has not yet been conducted at SWMU 16-028(e); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. However, decision-level data are available from the 1995 RFI.

The project map (Figure 209-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

209.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 209-1).

Enhanced controls were installed and certified on September 25, 2012, and submitted to EPA on October 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 209-1 Active Control Measures

		Purpose of Control				
Control ID	Control Name	Run- On	Runoff	Erosion	Sediment	Control Status
W00302040010	Established Vegetation	-	х	Х	-	В
W00303010007	Earthen Berm	-	Х	-	Х	EC
W00303010008	Earthen Berm	-	х	-	Х	EC
W00306010009	Rock Check Dam	-	Х	-	Х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

209.3 Storm Water Monitoring

SWMU 16-028(e) is monitored within W-SMA-2.05. Following the installation of baseline control measures, a baseline storm water sample was collected on August 21, 2011 (Figure 209-2). Analytical results from this sample yielded the following TAL exceedance:

• Aluminum concentration of 1240 μ g/L (MTAL is 750 μ g/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-028(e):

• Aluminum is not known to be associated with industrial materials historically managed at this Site. Aluminum was detected above the tuff BV in 1 of 10 shallow RFI samples at a concentration 1.4 times the tuff BV.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 209-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 209-2.

Monitoring location W-SMA-2.05 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Metals including aluminum are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff.

• Aluminum—The aluminum UTL for storm water containing sediments derived from Bandelier Tuff is 2210 µg/L and the aluminum background storm water UTL for storm water run-on from a developed urban landscape is 245 µg/L. The 2011 result is between these values.

All the analytical results for these samples are reported in the 2011 Annual Report.

209.4 Inspections and Maintenance

RG253 recorded two storm events at W-SMA-2.05 during the 2014 season. These rain events triggered one post-storm inspection. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-40790	7-31-2014
Annual Erosion Evaluation	COMP-43342	10-2-2014

Table 209-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-2.05 in 2014.

209.5 Compliance Status

The Site associated with W-SMA-2.05 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 209-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-028(e)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 09-25-2012.







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 209-2 Inorganic analytical results summary plot for W-SMA-2.05

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

210.0 W-SMA-3.5: SWMU 16-026(y)

210.1 Site Descriptions

One historical industrial activity area is associated with W004, W-SMA-3.5: Site 16-026(y).

SWMU 16-026(y) is a former outfall that served building 16-411. The outfall drainline consists of a 4-in.diameter VCP that exits the west side of building 16-411, then turns south to terminate at a discharge point on the hill slope of Water Canyon. The discharge point is located south of a double security fence at the edge of Water Canyon. Building 16-411 was constructed in 1951 and used to assemble finished HE components. The outfall received discharges from an equipment room floor drain, a sink, roof drains, a water fountain, and an eyewash station. In the 1990s, the roof drains were rerouted to a separate outfall, and all other drains were either plugged or rerouted to a holding tank.

Consent Order investigations have not yet begun at SWMU 16-026(y); the Site will sampled during the future Upper Water Canyon Aggregate Area investigation. Decision-level data are not available for the Site.

The project map (Figure 210-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

210.2 Control Measures

Potential run-on sources at this SMA include run-on from paved roads and possibly roof drainage associated with structure 16-0411. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 210-1).

Table 210-1 Active Control Measures

			Purpose of Control			
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Control Status
W00402040008	Established Vegetation	-	Х	Х	-	В
W00403060004	Straw Wattle	Х	-	-	Х	СВ
W00403060005	Straw Wattle	Х	-	-	Х	СВ
W00403060006	Straw Wattle	Х	-	-	Х	СВ
W00403060009	Straw Wattle	Х	-	-	Х	В
W00404060003	Rip Rap	-	Х	Х	-	СВ
W00406010007	Rock Check Dam	-	х	-	Х	CB

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

210.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-3.5. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

VOLUME 4: WATER/CANON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

210.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-3.5 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38704	5-28-2014
Storm Rain Event	BMP-39841	7-17-2014
Storm Rain Event	BMP-40810	7-23-2014
Storm Rain Event	BMP-41587	8-13-2014
Annual Erosion Evaluation	COMP-43343	10-2-2014

Table 210-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 210-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-43359	Installed straw wattles west of existing wattles between security fences across new flow path to direct flow back to established flow path.	10-15-2014	13 day(s)	Maintenance conducted as soon as practicable.

210.5 Compliance Status

The Site associated with W-SMA-3.5 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 210-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-026(y)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





211.0 W-SMA-4.1: SWMU 16-003(a)

211.1 Site Descriptions

One historical industrial activity area is associated with W005, W-SMA-4.1: Site 16-003(a).

SWMU 16-003(a) is an HE sump and an inactive former NPDES-permitted outfall (05A053) that served assembly building 16-410. The concrete subsurface sump is located on the exterior southeast wall of the building and measured 12 ft long × 4 ft wide × 5 ft high. The sump served floor, roof, and equipment drains and removed suspended HE solids from process water before it was discharged to the outfall, located approximately 320 ft southeast of the building. The sump was installed in the early 1950s and modified in 1966 to improve its effectiveness and to reduce HE handling. The outfall was plugged in 1992 and removed from the NPDES permit effective January 14, 1998. The sump remains active and is pumped out on a regular basis.

Consent Order investigations have not yet begun at SWMU 16-003(a); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. Decision-level data are available from an RFI performed in 1995.

The project map (Figure 211-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

211.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 211-1).

Table 211-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W00502040006	Established Vegetation	-	х	х	-	В
W00503060002	Straw Wattle	-	х	-	Х	СВ
W00503060005	Straw Wattle	Х	-	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

211.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-4.1. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

211.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-4.1 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 211-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38705	5-28-2014
Storm Rain Event	BMP-39842	7-17-2014
Storm Rain Event	BMP-40811	7-28-2014
Storm Rain Event	BMP-41588	8-13-2014
Annual Erosion Evaluation	COMP-43344	10-2-2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-4.1 in 2014.

211.5 Compliance Status

The Site associated with W-SMA-4.1 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 211-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-003(a)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





212.0 W-SMA-5: SWMUs 16-001(e), 16-003(f), 16-026(b), 16-026(c), 16-026(d), and 16-026(e)

212.1 Site Descriptions

Six historical industrial activity areas are associated with W006, W-SMA-5: Sites 16-001(e), 16-003(f), 16-026(b), 16-026(c), 16-026(d), and 16-026(e).

SWMU 16-001(e) is an inactive dry well located at TA-16 approximately 170 ft east of HE-processing building 16-306. Constructed in the 1980s, the dry well never functioned properly because it drained to impermeable tuff (Qbt4). Eventually, the dry well was filled with soil and capped with concrete.

Consent Order Phase I investigation sampling is complete. SWMU 16-001(e) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-001(e) will be eligible for a COC upon approval of the report by NMED. SWMU 16-003(f) consists of two HE sumps at TA-16 that served building 16-304. The sumps discharged to an outfall. Building 16-304 was a plastics and plastic-component development and production facility. Polycarbonate components were fabricated using injection-molding machines. Other components were made using hydraulic presses. Large high-temperature ovens were used to dry-mold powders and to cure thermoset plastics. Solvents also were used at building 16-304. By 1993, solvents were containerized and sent off-site for disposal, and HE operations in the building had ceased.

Consent Order Phase I investigation sampling is complete. SWMU 16-003(f) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-003(f) will be eligible for a COC upon approval of the report by NMED.

SWMU 16-026(b) is an inactive outfall located to the east of a resthouse (building 16-307). The outfall formerly received discharge from two HE sumps [SWMU 16-029(a)] located near the exterior southeast wall of the resthouse. The outfall discharged to Water Canyon. The sumps were plugged in 1990 and 1991. The resthouse was used to store molds and materials for plastics development and also previously housed a solvent disassembly tank used to remove HE from test devices.

Consent Order Phase I investigation sampling is complete. SWMU 16-026(b) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-026(b) will be eligible for a COC upon approval of the report by NMED.

SWMU 16-026(c) is an inactive outfall located at TA-16 to the south of a resthouse (building 16-305). The outfall previously received discharge from two HE sumps [SWMU 16-029(b)] located near the exterior southwest wall of the



resthouse. The outfall discharged to Water Canyon. One soil sample was taken from the outfall at structure 16-305 in 1970. Analytical results showed no TNT, RDX, or HMX, although some unknown HE decomposition products may have been present at low levels. The sumps were plugged in 1990 and

1991. The resthouse was used to store chemicals and solvents for plastics development and production and was also used for filament winding of developmental weapons components.

Consent Order Phase I investigation sampling is complete. SWMU 16-026(c) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-026(c) will be eligible for a COC upon approval of the report by NMED.

SWMU 16-026(d) is an inactive outfall located to the southeast of a resthouse (building 16-303). The outfall formerly received discharge from two HE sumps [SWMU 16-029(c)] located on the exterior southwest wall of the resthouse. Potential contaminants were HE, inorganic chemicals, and organic chemicals. The outfall discharged to Martin Spring Canyon. Two samples were taken at the SWMU 16-026(d) outfall in 1970. Samples showed elevated levels of HMX and/or RDX and TNT. The sumps were plugged in 1990 and 1991.

Consent Order Phase I investigation sampling is complete. SWMU 16-026(d) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-026(d) will be eligible for a COC upon approval of the report by NMED.

SWMU 16-026(e) is an inactive outfall located to the south of building 16-301. The outfall formerly received discharge from two HE sumps [SWMU 16-029(d)] located on the exterior west side of building 16-301. The outfall discharged to Martin Spring Canyon. Building 16-301 originally housed mock HE-processing operations and stored raw materials that were used to prepare mock HE. Building 16-301 was later used as an environmental testing laboratory for research in the effects of temperature, pressure, and humidity on weapons and components. The sumps were plugged in 1990 and 1991.

Consent Order Phase I investigation sampling is complete. Additional extent sampling at SMWU 16-026(e) is expected to be required as part of the Phase II investigation for S-Site Aggregate Area.

The project map (Figure 212-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

212.2 Control Measures

There are multiple potential sources of run-on to the SMA. Run-on originating east of K-Site road feeds a culvert that discharges into the channel in SWMU 16-026(c). Additionally, run-on from the facilities and the paved areas in the western portion of the SMA contribute run-on to the area. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 212-1).

ve Control Measures					
	Purpose of Control				Control
Control Name	Run-On	Runoff	Erosion	Sediment	Status
Established Vegetation	-	Х	Х	-	В
Straw Wattle	Х	-	-	Х	В
Culvert	Х	-	Х	-	СВ
Water Bar	Х	-	Х	-	В
Rip Rap	Х	-	Х	-	CB
Rock Check Dam	-	Х	-	Х	СВ
Rock Check Dam	-	Х	-	Х	CB
Rock Check Dam	-	Х	-	Х	СВ
Rock Check Dam	-	х	-	Х	СВ
Rock Check Dam	-	Х	-	Х	CB
Rock Check Dam	-	Х	-	Х	CB
Rock Check Dam	-	Х	-	Х	В
Rock Check Dam	-	Х	-	Х	В
Rock Check Dam	-	Х	-	Х	В
Rock Check Dam	-	Х	-	Х	В
Rock Check Dam	Х	-	-	Х	В
Rock Check Dam	Х	-	-	Х	В
Rock Check Dam	Х	-	-	Х	В
Rock Check Dam	-	Х	-	Х	В
Rock Check Dam	Х	-	-	Х	В
Rock Check Dam	Х	-	-	Х	В
	Control Name Established Vegetation Straw Wattle Culvert Water Bar Rip Rap Rock Check Dam	Control NameRun-OnEstablished Vegetation-Straw WattleXCulvertXWater BarXRip RapXRock Check Dam-Rock Check DamXRock Check Dam-Rock Check DamXRock Check Dam-Rock Check Dam-	Purpose aRun-OnRunoffEstablished Vegetation-XStraw WattleX-CulvertX-Water BarX-Rip RapX-Rock Check Dam-XRock Check DamX-Rock Check DamX-Rock Check DamX-Rock Check DamX-Rock Check DamX-Rock Check DamX-Rock Check Dam-XRock Check Dam-	Purpose of ControlControl NameRun-OnRunoffErosionEstablished Vegetation-XXStraw WattleXCulvertX-XWater BarX-XRip RapX-XRock Check Dam-X-Rock Check DamXRock Check DamX<	Purpose of ControlControl NameRun-OnRunoffErosionSedimentEstablished Vegetation-XX-Straw WattleX-X-XCulvertX-X-XWater BarX-X-XRip RapX-X-XRock Check Dam-X-XRock Check DamXXRock Check DamXX

Table 212-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

212.3 Storm Water Monitoring

SWMUs 16-001(e), 16-003(f), 16-026(b), 16-026(c), 16-026(d), and 16-026(e) are monitored within W-SMA-5. Following the installation of baseline control measures, a baseline storm water sample was collected on July 3, 2012 (Figures 212-2 and 212-3). Analytical results from this sample yielded the following TAL exceedance:

• Copper concentration of 6.28 µg/L (MTAL is 4.3 µg/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-001(e):

• Copper is not known to be associated with industrial materials historically managed at the Site. Copper was detected above the soil BV in shallow (i.e., less than 3 ft bgs) Consent Order samples. Copper was detected above BV in 2 of 4 shallow samples with a maximum concentration 1.9 times the soil BV.

SWMU 16-003(f):

• Copper is not known to be associated with industrial materials historically managed at the Site. Copper was not detected above BV in 1 shallow Consent Order soil sample collected at the Site.

SWMU 16-026(b):

• Copper is not known to be associated with industrial materials historically managed at the Site. Copper was not detected above BVs in 8 shallow Consent Order and RFI soil, sediment, and tuff samples.

SWMU 16-026(c):

• Copper is not known to be associated with industrial materials historically managed at the Site. Copper was detected above soil, sediment, and tuff BVs in shallow Consent Order and RFI samples. Copper was detected above BVs in 5 of 13 shallow samples with a maximum concentration 3.8 times sediment BV.

SWMU 16-026(d):

• Copper is not known to be associated with industrial materials historically managed at the Site. Copper was detected above soil and tuff BVs in shallow Consent Order and RFI samples. Copper was detected above the BVs in 3 of 16 shallow soil and tuff samples with a maximum concentration 4.5 times soil BV.

SWMU 16-026(e):

• Copper is not known to be associated with industrial materials historically managed at the Site. Copper was detected only slightly above soil and tuff BVs in shallow Consent Order and RFI samples. Copper was detected above the BVs in 3 of 19 shallow soil and tuff samples with a maximum concentration above BV 1.7 times the tuff BV.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 212-2 and 212-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 212-2 and 212-3.

Monitoring location W-SMA-5 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff.

• Copper—The copper UTL for storm water containing sediments derived from Bandelier Tuff is 3.43 µg/L, and the copper background storm water UTL for storm water run-on from a developed urban landscape is 32.3 µg/L. The result from 2012 is between these values.

VOLUME 4: WATER/CANON DE VALLE WATERSHED
Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

All the analytical results for these samples are reported in the 2012 Annual Report.

212.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-5 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38706	5-28-2014
Storm Rain Event	BMP-39843	7-17-2014
Storm Rain Event	BMP-40812	7-28-2014
Storm Rain Event	BMP-41589	8-13-2014
Annual Erosion Evaluation	COMP-43356	10-8-2014

Table 212-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 212-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-43515	Cleaned out culvert W00604040011 inlet using hand tools. Added angular rock to rock check dams W00606010012 and W00606010013 to increase height. Installed water bar on access road at culvert to divert run-on. Installed 2 rock check dams in channel below wattle W00603060030.	10-23-2014	15 day(s)	Maintenance conducted as soon as practicable.

212.5 Compliance Status

The Sites associated with W-SMA-5 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 212-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-001(e)	Corrective Action Initiated	Corrective Action Initiated	Initiated 09-18-2012. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-003(f)	Corrective Action Initiated	Corrective Action Initiated	Initiated 09-18-2012. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-026(b)	Corrective Action Initiated	Corrective Action Initiated	Initiated 09-18-2012. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-026(c)	Corrective Action Initiated	Corrective Action Initiated	Initiated 09-18-2012. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-026(d)	Corrective Action Initiated	Corrective Action Initiated	Initiated 09-18-2012. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-026(e)	Corrective Action Initiated	Corrective Action Initiated	Initiated 09-18-2012. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.





202

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 212-2 Inorganic analytical results summary plot for W-SMA-5

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 212-3 Organic analytical results summary plot for W-SMA-5

213.0 W-SMA-6: SWMU 11-001(c)

213.1 Site Descriptions

One historical industrial activity area is associated with W007, W-SMA-6: Site 11-001(c).

SWMU 11-001(c) is a former firing pit located at TA-16, northwest of former building 16-370 near the edge of Water Canyon. According to the 1990 SWMU report, the firing pit was similar in construction to Firing Pit 11-0014, which was a 37-ft semicircular wall that was 12.5 ft high and 4.5 ft thick. The SWMU 11-001(c) firing pit was first used in 1944. The date when use of the firing pit ceased is not documented; however, it would have been before construction of building 16-370 in the 1953. An RFI and a VCA were conducted in 1995 and 1996, respectively. However, during preparation of the Upper Water Canyon Aggregate Area investigation work plan, it was determined from engineering drawing R-126 that samples from the RFI and VCA were collected from the wrong location. The firing pit was actually located northwest of the area that was sampled.

Consent Order sampling has not yet been conducted at SWMU 11-001(c); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. Decision-level are not available from the 1995 RFI or 1996 VCA.

The project map (Figure 213-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

213.2 Control Measures

There are no run-on sources at this SMA, and runoff from the area is minimal. Existing controls serve to capture sediment and moderate runoff. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 213-1).

Table 213-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W00701010007	Seed and Wood Mulch	-	-	Х	-	В
W00702040004	Established Vegetation	-	Х	Х	-	В
W00703060005	Straw Wattle	-	Х	-	Х	В
W00703060006	Straw Wattle	-	Х	-	Х	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

213.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-6. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

VOLUME 4: WATER/CANON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

213.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-6 during the 2014 season. These rain events triggered f poststorm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38707	5-28-2014
Storm Rain Event	BMP-39844	7-17-2014
Storm Rain Event	BMP-40813	7-28-2014
Storm Rain Event	BMP-41590	8-11-2014
Annual Erosion Evaluation	COMP-43357	10-6-2014

Table 213-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-6 in 2014.

213.5 Compliance Status

The Site associated with W-SMA-6 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 213-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 11-001(c)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

214.0 W-SMA-7: SWMU 16-029(e) and 16-026(h2)

214.1 Site Descriptions

Two historical industrial activity areas are associated with W008, W-SMA-7: Sites 16-029(e) and 16-026(h2).

SWMU 16-029(e) consists of an HE sump and formerly NPDES-permitted outfall (05A159) that served HE equipment assembly building 16-360. The sump is a 12- × 4- × 5-ft subsurface reinforced concrete structure located on the exterior southeast side of the building. The sump received wash water from historical cleaning activities and discharged southeast to the outfall through a 6-in.-diameter drainline. The sump outlet was plugged in the early 1990s; the outfall was removed from the NPDES permit effective August 16, 1995.

Consent Order sampling has not yet been conducted at SWMU 16-029(e); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation.

A recent review of the justification to include SWMU 16-026(h2) in the IP and review of the neighboring SWMUs identified a typographical error: in the Final Supplemental Information Submittal, Volume 1, an outfall receiving discharge from a sump associated with building 16-360 was identified as a proposed Site for inclusion in the IP. The site descriptions in the 1990 SWMU report and the Final Supplemental Information Submittal, Volume 1, are consistent and make it clear the intended SWMU was 16-029(e), not SWMU 16-026(h2). SWMU 16-029(e) is described as an "HE sump and formerly NPDES-permitted outfall" associated with building 16-360, while SWMU 16-026(h2) is described as four outfalls, including steam pit and roof drains, that are also associated with building 16-360. SWMU 16-029(e) is located within the current SMA boundary, and no changes to the SMA boundary are required. The sampler location will not change, and samples previously collected are representative of the SWMU 16-029(e). An explanation of the error will be incorporated in the IP renewal application. The information and evaluation of Site 16-029(e) provided below and in other sections of this SDPPP update are for informational purposes only.

SWMU 16-026(h2) consists of four outfalls at TA-16 that served HE equipment assembly building 16-360. The western outfall received discharge from a steam pit drain. The southern outfall received condensate from three floor drains. The remaining two outfalls are located to the east of the building and discharge storm water from roof drains. In the 1990s, the steam pit drain and floor drains were rerouted to the sanitary sewer system.

The project map (Figure 214-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

214.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 214-1).

		Purpose of Control		Control		
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W00801010022	Seed and Wood Mulch	-	-	х	-	В
W00802040014	Established Vegetation	-	х	х	-	В
W00803060010	Straw Wattle	х	-	-	х	СВ
W00803060017	Straw Wattle	х	-	-	х	В
W00803060018	Straw Wattle	х	-	-	Х	В
W00803060019	Straw Wattle	-	х	-	Х	В
W00803060024	Straw Wattle	-	х	-	Х	В
W00803060025	Straw Wattle	-	х	-	Х	В
W00806010001	Rock Check Dam	-	х	-	Х	СВ
W00806010003	Rock Check Dam	-	х	-	Х	СВ
W00806010004	Rock Check Dam	-	х	-	Х	СВ
W00806010015	Rock Check Dam	-	Х	-	Х	В
W00806010016	Rock Check Dam	-	Х	-	Х	В
W00808040023	Metal Cap	х	-	-	-	В

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

214.3 Storm Water Monitoring

SWMUs 16-029(e) and 16-029(h2) are monitored within W-SMA-7. Following the installation of baseline control measures, a baseline storm water sample was collected on July 8, 2014 (Figure 214-2). Analytical results from this sample yielded the following TAL exceedances:

- Gross-alpha activity of 427 pCi/L (ATAL is 15 pCi/L) and
- Radium-226 and radium-228 activity of 42 pCi/L (ATAL is 30 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-029(e):

• Alpha-emitting radionuclides including radium-226 and radium-228 are not known to be associated with industrial materials historically managed at the Site.

SWMU 16-029(h2):

• Alpha-emitting radionuclides including radium-226 and radium-228 are not known to be associated with industrial materials historically managed at the Site.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from

storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 214-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 214-2.

Monitoring location W-SMA-7 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium-and thorium-bearing minerals.

- Gross alpha—Gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and gross-alpha background storm water UTL for storm water runon from a developed urban landscape is 32.5 pCi/L. The 2014 gross-alpha result is between these two values.
- Radium-226 and Radium-228—Radium-226 and radium-228 UTL for background storm water containing sediment derived from Bandelier Tuff is 52.7 pCi/L, and radium-226 and radium-228 background storm water UTL for storm water run-on from a developed urban landscape is 8.94 pCi/L. The 2014 radium-226 and radium-228 result is between these two values.

All the analytical results for these samples are reported in the 2014 Annual Report.

214.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-7 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38708	5-28-2014
Storm Rain Event	BMP-39845	7-17-2014
Storm Rain Event	BMP-40814	7-28-2014
Storm Rain Event	BMP-41591	8-11-2014
Annual Erosion Evaluation	COMP-43345	10-7-2014
TAL Exceedance	COMP-42721	10-7-2014

Table 214-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 214-3Maintenance during 2014

Maintenance	Maintenance Conducted	Maintenance	Response	Response
Reference		Date	Time	Discussion
BMP-43361	Installed new straw wattles directly upgradient of existing wattles W00803060020 andW00803060021 as replacements.	10-15-2014	8 day(s)	Maintenance conducted as soon as practicable.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

214.5 **Compliance Status**

The Site associated with W-SMA-7 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-029(e)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-11-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 11-01-2015.
SWMU 16-026(h2)	Baseline Monitoring Extended	Corrective Action Initiated	Initiated 08-11-2014. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 11-01-2015.

Table 214-4Compliance Status during 2014

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.





Figure 214-1 W-SMA-7 location map



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 214-2 Inorganic analytical results summary plot for W-SMA-7

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE** VALLE WATERSHED

215.0 W-SMA-7.8: SWMU 16-031(a)

215.1 Site Descriptions

One historical industrial activity area is associated with W009, W-SMA-7.8: Site 16-031(a).

SWMU 16-031(a) is an outfall that served a former cooling tower (building 16-372) at TA-16. The outfall discharged approximately 150 ft south of the cooling tower at the edge of Water Canyon. The outfall drainline was a 6-in.-diameter VCP that originated from a drain inside the southeast corner of the cooling tower. The cooling tower served building 16-370, a barium nitrate–grinding facility and metal-forming shop. The cooling tower was built in 1953 and burned down during the Cerro Grande fire in 2000. The concrete foundation remains in place.

Consent Order investigations have not yet begun at SWMU 16-031(a); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. Decision-level data are not available for the Site.

The project map (Figure 215-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

215.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 215-1).

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W00902040009	Established Vegetation	-	Х	х	-	В
W00903010004	Earthen Berm	Х	-	-	Х	СВ
W00904060003	Rip Rap	Х	-	х	-	СВ
W00906010001	Rock Check Dam	Х	-	-	Х	СВ
W00906010005	Rock Check Dam	Х	-	-	Х	СВ
W00906010006	Rock Check Dam	Х	-	-	Х	СВ
W00906010007	Rock Check Dam	-	Х	-	Х	СВ

Table 215-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

215.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-7.8. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

215.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-7.8 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38709	5-28-2014
Storm Rain Event	BMP-39846	7-17-2014
Storm Rain Event	BMP-40815	7-28-2014
Storm Rain Event	BMP-41592	8-11-2014
Annual Erosion Evaluation	COMP-43346	10-6-2014

Table 215-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-7.8 in 2014.

215.5 Compliance Status

The Site associated with W-SMA-7.8 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 215-3 Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-031(a)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment






216.0 W-SMA-7.9: SWMU 16-006(c)

216.1 Site Descriptions

One historical industrial activity area is associated with W010, W-SMA-7.9: Site 16-006(c).

SWMU 16-006(c) is an inactive septic system located just west of former building 16-370. The septic system served building 16-370 and consisted of a 1200-gal. concrete septic tank (structure 16-371) and outfall drainline. The 1990 SWMU report states the septic tank discharged to a drain field. However, engineering drawings verify that a drain field was never constructed. The tank was constructed in 1953 and served floor drains and bathrooms on the third floor of building 16-370. Associated drainlines connect to a manhole (structure 16-813), which drained to the septic tank. The outlet line drained to an outfall approximately 260 ft south of the septic tank. The outfall discharged at the edge of Water Canyon. After the drainline was plugged in 1992, the tank was pumped regularly during the time building 16-370 remained operational until 2000. Building 16-370 underwent partial D&D in 2004; only a portion of the wall and the concrete slab remain.

Consent Order investigations have not yet begun at SWMU 16-006(c); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. Decision-level data are available from an RFI performed in 1995 and 1996. The project map (Figure 216-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: http://www.lanl.gov/community-environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

216.2 Control Measures

There are no run-on sources at this SMA. Existing controls manage runoff and sediment migration. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 216-1).

Table 216-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01002040004	Established Vegetation	-	х	Х	-	В
W01006010003	Rock Check Dam	-	х	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

216.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-7.9. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

VOLUME 4: WATER/CANON DE VALLE WATERSHEL Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

216.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-7.9 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38699	5-28-2014
Storm Rain Event	BMP-39836	7-18-2014
Storm Rain Event	BMP-40805	7-28-2014
Storm Rain Event	BMP-41582	8-11-2014
Annual Erosion Evaluation	COMP-43347	10-6-2014

Table 216-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-7.9 in 2014.

216.5 Compliance Status

The Site associated with W-SMA-7.9 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 216-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-006(c)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





217.0 W-SMA-8: SWMUs 16-016(g) and 16-028(b)

217.1 Site Descriptions

Two historical industrial activity areas are associated with W011, W-SMA-8: Sites 16-016(g), and 16-028(b).

SWMU 16-016(g) is a surface disposal area associated with former building 16-370. Debris includes cans and pipes that were distributed over a 20-ft-diameter area and located in a drainage ditch approximately 60 ft south of the building. Building 16-370 was constructed in 1953 as a barium nitrate– grinding facility and later converted to a metal-forming shop for steel and aluminum. Building 16-370 was demolished in March 2005. HE was never used in the building. The surface disposal area lies in the drainage ditch shared by both SWMUs 16-026(a) and 16-028(b). Field observations indicated the debris was construction debris and not operational waste.

Consent Order sampling has not yet been conducted at SWMU 16-016(g); the Site will be sampled during the future Upper Water Canyon Aggregate Area investigation. No previous investigations have been conducted at the Site.

SWMU 16-028(b) is a formerly NPDES-permitted outfall (04A092) that served former building 16-370. The outfall is located approximately 50 ft south of building 16-370. The outfall drainline consists of a 6-in. VCP that exits building 16-370 from its west side and daylights in Water Canyon. The outfall formerly received effluent from 29 floor drains, an eyewash station, a drinking fountain, and a sink. Building 16-370 was built in 1953 as a barium nitrate–grinding facility. In the late 1950s, it was converted to a metal-forming shop for steel and aluminum. Building 16-370 was demolished in March 2005. All drains that discharged to the outfall were plugged in the 1990s. The outfall was removed from the NPDES permit effective January 14, 1998. In July 2000, as part of the post–Cerro Grande fire recovery, debris removal, mulching, and permanent seeding were conducted at this Site as BMPs. Straw wattles were also installed to stabilize the Site and to prevent storm water run-on and runoff.

Consent Order sampling has not yet been conducted at SWMU 16-028(b); the Site will sampled during the future Upper Water Canyon Aggregate Area investigation. However, decision-level data are available from the 1998 investigation.

The project map (Figure 217-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

217.2 Control Measures

Run-on from the paved access road is diverted by existing controls into a culvert and discharges east of the SMA. Existing controls are in place to manage potential run-on from the facility pad and the former building footprint. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 217-1).

Table 217-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01102040009	Established Vegetation	-	Х	Х	-	В
W01103010012	Earthen Berm	Х	-	-	Х	EC
W01103010013	Earthen Berm	Х	-	-	Х	EC
W01103010014	Earthen Berm	Х	-	-	Х	EC
W01103010015	Earthen Berm	Х	-	-	Х	EC
W01103040010	Asphalt Berm	Х	-	Х	-	EC
W01106010006	Rock Check Dam	Х	-	-	Х	СВ
W01106010011	Rock Check Dam	Х	-	-	Х	EC
W01106010016	Rock Check Dam	-	x	-	х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

217.3 Storm Water Monitoring

SWMUs 16-016(g) and 16-028(b) are monitored within W-SMA-8. Following the installation of baseline control measures, a baseline storm water sample was collected on September 12, 2013 (Figures 217-2 and 217-3). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 823 μg/L (MTAL is 750 μg/L) and
- Copper concentrations of 28.1 μ g/L (MTAL is 4.3 μ g/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-016(g):

- Aluminum may have been associated with industrial materials historically managed at this Site. No soil data are available to evaluate whether the Site is a potential source of the TAL exceedances.
- Copper may have been associated with industrial materials historically managed at this Site. No soil data are available to evaluate whether the Site is a potential source of the TAL exceedances.

SWMU 16-028(b):

- Aluminum is not known to be associated with industrial materials historically managed at this Site. Aluminum was not detected above the soil BV in the single shallow sample collected during the 1998 investigation.
- Copper may have been associated with industrial materials historically managed at this Site. Copper was detected at a concentration 32 times the soil BV in the single shallow sample collected during the 1998 investigation.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 217-2 and 217-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 217-2 and 217-3.

Monitoring location W-SMA-8 receives storm water run-on from the SWMU 16-016(g) surface disposal area and from landscapes containing sediment derived from Bandelier Tuff.

- Aluminum—The aluminum UTL from developed urban landscape storm water run-on is 245 μg/L; the aluminum UTL for background storm water containing sediment derived from Bandelier Tuff is 2210 μg/L. The aluminum result from 2013 is between these two values.
- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2013 is between these two values.

All the analytical results for these samples are reported in the 2013 Annual Report.

The monitoring station for W-SMA-8 has been relocated. The new location of the sampler is positioned below all controls and will provide a more representative sample of storm water discharge from the SMA. Sampler coordinates and the SMA drainage area are updated in Attachment 4.

217.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-8 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38700	5-28-2014
Storm Rain Event	BMP-39837	7-18-2014
Storm Rain Event	BMP-40806	7-28-2014
Storm Rain Event	BMP-41583	8-11-2014
Annual Erosion Evaluation	COMP-43348	10-6-2014
Verification Inspection for Enhanced Controls	BMP-43881	12-22-2014

Table 217-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-8 in 2014.

217.5 Compliance Status

The Sites associated with W-SMA-8 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 217-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-016(g)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Alternatives analysis has determined the corrective action plan is to build enhanced controls.
SWMU 16-028(b)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Alternatives analysis has determined the corrective action plan is to build enhanced controls.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.









Figure 217-2 Inorganic analytical results summary plot for W-SMA-8

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

225



Figure 217-3 Organic analytical results summary plot for W-SMA-8

226

218.0 W-SMA-8.7: SWMUs 13-001, 13-002, 16-004(a), 16-026(j2), 16-029(h), and 16-035

218.1 Site Descriptions

Six historical industrial activity areas are associated with W012, W-SMA-8.7: Sites 13-001, 13-002, 16-004(a), 16-026(j2), 16-029(h), and 16-035.

SWMU 13-001 is an inactive firing site located east of former building 16-340. The firing site is associated with firing activities conducted at P-Site (former TA-13). The area contains shrapnel and debris, including firing cables, lead balls, and chunks of steel and copper.

Phase I Consent Order sampling is complete for SWMU 13-001. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for two detections of arsenic in two subsurface tuff samples. SWMU 13-001 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 13-001 will be eligible for a COC upon approval of the report by NMED.

Phase I Consent Order sampling is complete for SWMU 16-035. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for two detections of arsenic in two subsurface tuff samples. SWMU 16-035 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-035 will be eligible for a COC upon approval of the report by NMED. Phase I Consent Order sampling is complete for SWMU 13-002. All detected inorganic and organic chemical concentrations from Consent Order samples were below residential SSLs. SWMU 13-002 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED. Site Aggregate Area, to be submitted to NMED in 2015. SWMU 13-002 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 13-002 will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 13-002 will be eligible for a COC upon approval of the report by NMED.

SWMU 16-004(a) is the inactive Imhoff tank (structure 16-530) that was used for sewage treatment at the TA-16 sanitary WWTP. The structure is approximately 20 × 35 ft with a total area of 700 ft² and a depth of 22 ft. The tank was taken out of service in 1992. Located southeast of the former TA-16-340 Complex and north of the communitor (a cutting device for sewage solids), the Imhoff tank received effluent that flowed over a weir into a dosing siphon. Any sludge that may have collected in the tank was digested it was discharged to drying beds [SWMUs 16-004(d) and 16-004(f)]. The tank had an emergency overflow pipe that discharged onto a slope northeast of the tank.

SWMU 16-004(a) was investigated under the Consent Order and recommended for corrective action complete. NMED did not concur and directed the Laboratory to conduct additional sampling. Existing data for this Site will be reevaluated using the supplemental investigation report process to determine if additional sampling is warranted and whether a COC can be requested.

SWMU 16-026(j2) consists of the former outfall from a former HE sump [SWMU 16-029(f)] associated with a former resthouse (structure 16-345) located on the 340-Line at TA-16. The resthouse and sump were constructed in 1952 and served as a HE storage facility for former building 16-340. The sump was located on the southeast exterior wall and received discharge generated during cleaning activities. The outfall received effluent from the sump and discharged southeast of the sump location. The resthouse, sump, and associated drainlines were all removed in 2005.

SWMU 16-026(j2) was investigated under the Consent Order and recommended for corrective action complete. NMED approved the investigation report but required the Laboratory to conduct additional surface water and groundwater sampling for the TA-16-340 Complex as well as to maintain the BMPs.

SWMU 16-029(h) consists of an inactive outfall and two inactive/former drainlines (one known and one suspected) from the HE sump [AOC 16-003(p)], located on the south side of former building 16-478. The known drainline exits the southeast corner of the sump and extends 80 ft east of the sump to the rim of Cañon de Valle. This drainline discharged directly into Cañon de Valle before the drainline was plugged in 1987. A second drainline is alleged to be present. The second drainline is reportedly a French drain that extends south of the sump. Former building 16-478 was used as a bunker, utility room, control room, and high-speed machining room for tests on experimental HE. When the building was removed in 2005, the sump was left in place. During the investigation activities conducted in 2009 and 2010, no evidence of the French drain was found.

Phase I Consent Order sampling is complete for SWMU 16-029(h). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for two detections of arsenic in two subsurface tuff samples. SWMU 16-029(h) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-029(h) will be eligible for a COC upon approval of the report by NMED.

SWMU 16-035 is an area of potential soil contamination located approximately 200 ft east of former building 16-340. The soil contamination is associated with a former control bunker (former structure 13-2 renumbered to 16-476). The control bunker was one of several buildings constructed at TA-13 in 1944 to support the Manhattan Project. Former TA-13 was built in 1944 to support the HE project of the Manhattan Project and has been used since then for a variety of Laboratory activities. It was principally designed as a site for counter–x-ray diagnostics of HE lens configurations. Activities that supported the diagnostics included operating counter–x-ray equipment, HE assembly, and research in the magnetic method program. The control bunker was removed during D&D activities in 2005.

SWMU 16-035 was investigated under the Consent Order and recommended for additional sampling to define extent. Existing data for these Sites will be reevaluated using the supplemental investigation report.

The project map (Figure 218-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

218.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 218-1).

Table 218-1 Active Control Measures

			Purpose of Control			Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01202040011	Established Vegetation	-	х	Х	-	В
W01203060010	Straw Wattle	-	Х	-	Х	СВ
W01206010006	Rock Check Dam	-	Х	-	Х	СВ
W01206010007	Rock Check Dam	-	Х	-	Х	CB
W01206010008	Rock Check Dam	Х	-	-	Х	CB

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

218.3 Storm Water Monitoring

SWMUs 13-001, 13-002, 16-004(a), 16-026(j2), 16-029(h), and 16-035 are monitored within W-SMA-8.7. Following the installation of baseline control measures, a baseline storm water sample was collected on September 12, 2013 (Figures 218-2 and 218-3). Analytical results from this sample yielded the following TAL exceedance:

• Aluminum concentration of 1920 μg/L (MTAL is 750 μg/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 13-001:

• Aluminum is not known to have been associated with industrial materials historically managed at this Site. Aluminum was not detected above the soil BV in 28 shallow soil samples collected during 2009–2010 Consent Order investigations.

SWMU 13-002:

• Aluminum is not known to have been associated with industrial materials historically managed at this Site. Aluminum was not detected above the soil BV in 8 shallow soil samples collected during 2009–2010 Consent Order investigations.

SWMU 16-004(a):

• Aluminum is not known to be associated with industrial materials historically managed at this Site. Samples collected during the 2010 Consent Order investigation were all deep (i.e., greater than 22 ft bgs) samples collected beneath the bottom of the Imhoff tank. No shallow sample data are available for this site.

SWMU 16-026(j2):

• Aluminum is not known to have been associated with industrial materials historically managed at this Site. Aluminum was detected above sediment and tuff BVs in 2 of 14 shallow soil, sediment, and tuff samples collected during 2005 and 2008 Consent Order investigations. Aluminum was detected at a maximum concentration 2 times the sediment BV.

SWMU 16-029(h):

 Aluminum is not known to have been associated with industrial materials historically managed at this Site. Aluminum was not detected above the soil BV in 17 shallow soil samples collected during 2009–2010 Consent Order investigations.

SWMU 16-035:

• Aluminum is not known to be associated with industrial materials historically managed at this Site. Aluminum was not detected above BVs in 29 shallow (i.e., less than 3 ft bgs) soil and tuff samples collected during the 2010 Consent Order investigation.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 218-2 and 218-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figures 218-2 and 218-3.

Monitoring location W-SMA-8.7 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from Bandelier Tuff. Metals including aluminum are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff.

 Aluminum—The aluminum UTL from developed urban landscape storm water run-on is 245 μg/L; the aluminum UTL for background storm water containing sediment derived from Bandelier Tuff is 2210 μg/L. The aluminum result from 2013 is between these two values.

All the analytical results for these samples are reported in the 2013 Annual Report.

218.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-8.7 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38701	5-28-2014
Storm Rain Event	BMP-39838	7-18-2014
Storm Rain Event	BMP-40807	7-28-2014
Storm Rain Event	BMP-41584	8-11-2014
Annual Erosion Evaluation	COMP-43349	10-8-2014

Table 218-2Control Measure Inspections during 2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-8.7 in 2014.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

218.5 Compliance Status

The Sites associated with W-SMA-8.7 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 13-001	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 13-002	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-004(a)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-026(j2)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU16-029(h)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 16-035	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-25-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Table 218-3Compliance Status during 2014

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.







Inorganic analytical results summary plot for W-SMA-8.7 **Figure 218-2**

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE** VALLE WATERSHED



Figure 218-3 Organic analytical results summary plot for W-SMA-8.7

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE

VALLE WATERSHED

219.0 W-SMA-8.71: SWMU 16-004(c)

219.1 Site Descriptions

One historical industrial activity area is associated with W012A, W-SMA-8.71: Site 16-004(c).

SWMU 16-004(c) is the inactive clarifier or final tank (structure 16-532) used for sewage treatment at the former TA-16 sanitary WWTP. The structure is approximately 20 × 20 ft with a total area of 400 ft². The clarifier was located southeast of the trickling filter. The clarifier received discharge from the trickling filter; water flowed through an outlet in the clarifier and discharged to formerly NPDES-permitted outfall EPA-SSS03S and eventually into a tributary of Water Canyon. At full capacity, structure 16-532 could manage 117,600 gal./d. The formerly NPDES-permitted outfall (EPA-SSS03S) for the WWTP was monitored for inorganic chemicals, organic chemicals, and pesticides. Effluent was monitored bimonthly for radionuclides and standard parameters for wastewater systems (e.g., biological oxygen demand, chemical oxygen demand, and total dissolved solids). The former TA-16 sanitary WWTP was constructed in 1953 and was decommissioned in 1992; some of the concrete foundations remain in place.

Phase I Consent Order sampling is complete for SWMU 16-004(c). All detected inorganic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 16-004(c) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 16-004(c) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 219-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

219.2 Control Measures

There is the potential for run-on from the paved access road near the SWMU. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 219-1).

Enhanced controls were installed and certified on November 27, 2012, and submitted to EPA on December 13, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 219-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W012A02040006	Established Vegetation	-	Х	х	-	В
W012A03010004	Earthen Berm	-	Х	-	Х	EC
W012A03010005	Earthen Berm	Х	-	-	Х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

219.3 Storm Water Monitoring

SWMU 16-004(c) is monitored within W-SMA-8.71. Following the installation of baseline control measures, a baseline confirmation sample was collected on August 21, 2011 (Figure 219-2). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 15.8 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at W-SMA-8.71, a corrective action storm water sample was collected on September 13, 2013 (Figure 219-2). Analytical results from this corrective action monitoring sample yielded the following TAL exceedances:

- Copper concentrations of 19.8 μg/L (MTAL is 4.3 μg/L),
- Mercury concentration of 1.51 μ g/L (ATAL is 0.77 μ g/L), and
- Zinc concentration of 55.4 μ g/L (MTAL is 42 μ g/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 16-004(c):

- Copper is not known to be associated with industrial materials historically managed at this Site. No shallow Consent Order samples were collected from this Site; potential contamination is expected in the subsurface (i.e., greater than 20 ft bgs). However, copper was not detected above BVs in any of the subsurface Consent Order samples collected at SWMU 16-004(c).
- Mercury is not known to be associated with industrial materials historically managed at this Site. No shallow Consent Order samples were collected from this Site; potential contamination is expected in the subsurface (i.e., greater than 20 ft bgs). However, mercury was not detected above BVs in any of the subsurface Consent Order samples collected at SWMU 16-004(c).
- Zinc is not known to be associated with industrial materials historically managed at this Site. No shallow Consent Order samples were collected from this Site; potential contamination is expected in the subsurface (i.e., greater than 20 ft bgs). However, zinc was not detected above BVs in any of the subsurface Consent Order samples collected at SWMU 16-004(c).

Based on the Site history (no surface contamination) and Consent Order sampling data (no detects of TAL exceedance constituents), the Site is an unlikely source of the TAL exceedances.

The TAL exceedance was also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 219-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 219-2. Monitoring location W-SMA-8.71 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

- Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 μg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 μg/L. The copper result from 2013 is between these two values.
- Mercury—The mercury UTLs from undisturbed Bandelier Tuff and from developed urban landscape background storm water run-on were not calculated because the number of detected values was not sufficient to calculate the UTL values in the baseline metals background study. Therefore, no comparison to mercury background values in storm water could be made.
- Zinc—The zinc UTL from developed urban landscape storm water run-on is 1120 μg/L; the zinc UTL for background storm water containing sediment derived from Bandelier Tuff is 109 μg/L. The zinc result from 2013 is less than these two values.

All the analytical results for these samples are reported in the 2011 and 2013 Annual Reports.

219.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-8.71 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38710	5-28-2014
Storm Rain Event	BMP-39847	7-17-2014
Storm Rain Event	BMP-40816	7-28-2014
Storm Rain Event	BMP-41593	8-13-2014
Annual Erosion Evaluation	COMP-43350	10-8-2014
TAL Exceedance	COMP-44546	10-8-2014

Table 219-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 219-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-42131	Repaired berm W012A03010005. Removed matting from eroded area(s), added clean fill, and compacted. Reapplied seed and matting. Applied seed and mulch or hydromulch to all areas disturbed by maintenance activities.	9-18-2014	36 day(s)	Maintenance delayed.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

219.5 Compliance Status

The Site associated with W-SMA-8.71 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 219-4	Com	pliance	Status	during	2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 16-004(c)	Corrective Action Initiated after second TAL exceedance	Corrective Action Initiated after second TAL exceedance	Second initiation on 10-30-2013. Permit screening process for corrective action recommendation: Alternatives analysis is being performed to determine appropriate control to achieve corrective action. The proposed date of compliance certification is 09-20-2015.

Further details regarding compliance status and planned activities can be found in Attachment 6 for the Site in this SMA.







Figure 219-2 Inorganic analytical results summary plot for W-SMA-8.71

220.0 W-SMA-9.05: AOC 16-030(g)

220.1 Site Descriptions

One historical industrial activity area is associated with W013, W-SMA-9.05: Site 16-030(g).

AOC 16-030(g) is a former NPDES-permitted outfall (05A052) located south of building 16-380 at TA-16. The outfall received effluent from a sump [SWMU 16-003(m)], two roof drains, a steam-heating system, and a drop inlet from a parking lot and discharged to Water Canyon. The outfall was removed from the NPDES permit in 1993. The sump and the steam-heating system discharge lines have been plugged, and the outfall currently receives only roof drain and parking lot runoff.

Consent Order investigations have not yet begun at AOC 16-030(g); the Site will sampled during the future Upper Water Canyon Aggregate Area investigation.

The project map (Figure 220-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

220.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 220-1).

		Purpose of Control		Control		
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01302040013	Established Vegetation	-	Х	Х	-	В
W01303010003	Earthen Berm	Х	-	-	х	СВ
W01303010010	Earthen Berm	-	х	-	Х	В
W01303010011	Earthen Berm	-	х	-	Х	В
W01304010004	Earthen Channel/Swale	Х	-	Х	-	СВ
W01306010001	Rock Check Dam	-	Х	-	Х	СВ
W01306010012	Rock Check Dam	-	Х	-	Х	В

Table 220-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

220.3 Storm Water Monitoring

AOC 16-030(g) is monitored within W-SMA-9.05. Following the installation of baseline control measures, a baseline storm water sample was collected on September 13, 2013 (Figures 220-2 and 220-3). Analytical results from this sample yielded no TAL exceedances. Baseline confirmation is complete for W-SMA-9.05 and the associated AOC 16-030(g) because all applicable sampling results are below the applicable MTAL or ATAL. No further sampling is required for W-SMA-9.05 for the remaining period of the IP.

220.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-9.05 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38698	5-28-2014
Storm Rain Event	BMP-39835	7-18-2014
Storm Rain Event	BMP-40804	7-28-2014
Storm Rain Event	BMP-41581	8-11-2014
Annual Erosion Evaluation	COMP-43351	10-7-2014

Table 220-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 220-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-36599	Repaired berm W01303010010 by removing matting from damaged/degraded area(s) of berm. Added clean fill and compacted. Installed a spillway 6 ft wide and lined with nonwoven geotextile fabric and TRM. Applied seed and TRM to entire berm. Applied seed and mulch to disturbed areas.	3-25-2014	181 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

220.5 Compliance Status

The Site associated with W-SMA-9.05 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 220-4 Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 16-030(g)	Baseline Confirmation Complete	Baseline Confirmation Complete	No Comment







Figure 220-2 Inorganic analytical results summary plot for W-SMA-9.05



Figure 220-3 Organic analytical results summary plot for W-SMA-9.05

221.0 W-SMA-9.5: AOC 11-012(c)

221.1 Site Descriptions

One historical industrial activity area is associated with W014, W-SMA-9.5: Site 11-012(c).

AOC 11-012(c) is an area of potential surface-soil contamination associated with the footprint of former storage magazine 11-9 and is located approximately 500 ft west of building 11-4 at TA-11. Constructed of wood, the 16-ft square × 9-ft high magazine 11-9 was built in 1945 and was destroyed by intentional burning in 1960.

AOC 11-012(c) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order sampling has not been conducted at the Site. No investigations were conducted before the Consent Order went into effect in March 2005.

The project map (Figure 221-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

221.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 221-1).

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01402040008	Established Vegetation	-	Х	Х	-	В
W01403010006	Earthen Berm	Х	-	-	Х	В
W01403010007	Earthen Berm	Х	-	-	Х	В
W01403060002	Straw Wattle	-	Х	-	Х	СВ
W01403060003	Straw Wattle	-	Х	-	Х	СВ

Table 221-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

221.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-9.5. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

221.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-9.5 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 221-2Control Measure Inspections during 2013

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38702	5-30-2014
Storm Rain Event	BMP-39839	7-17-2014
Storm Rain Event	BMP-40808	7-31-2014
Storm Rain Event	BMP-41585	8-13-2014
Annual Erosion Evaluation	COMP-43291	10-7-2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-9.5 in 2014.

221.5 Compliance Status

The Site associated with W-SMA-9.5 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 221-3 Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 11-012(c)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment







222.0 W-SMA-9.7: SWMUs 11-011(a) and 11-011(b)

222.1 Site Descriptions

Two historical industrial activity areas are associated with W015, W-SMA-9.7: Sites 11-011(a) and 11-011(b).

SWMU 11-011(a) is an inactive NPDES-permitted outfall (EPA-03A130) located at TA-11 north of the K-Site complex and approximately 6 ft northeast of the Electrodynamics Vibration Test Facility (building 11-30), which housed water-cooled electronic equipment. Potential contaminants are organic chemicals. The outfall consisted of a 2-in. pipe that discharged northward to a tributary of Water Canyon. The outfall received untreated cooling tower blowdown from building 11-30. This outfall was removed from the NPDES permit during the 2013 permit renewal.

Consent Order Phase I investigation sampling is complete at this Site. Additional characterization sampling at SMWU 11-011(a) is expected to be required as part of the Phase II investigation for S-Site Aggregate Area.

SWMU 11-011(b) is an outfall located at TA-11 north of the Electrodynamics Vibration Test Facility (building 11-30). The inactive outfall consists of a 3-in. pipe that extends about 10 in. beyond the side of a hill. The outfall received discharges from floor drains in building 11-30 from the early 1960s to 1990.

A report prepared by Santa Fe Engineering stated the only potential discharges from floor drains would be deionized water and residual HE potentially released from containers processed on shakers in the building.

Consent Order Phase I investigation sampling is complete at this Site. All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs, except for two detections of benzo(a)pyrene. SWMU 11-011(b) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-011(b) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 222-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

222.2 Control Measures

Run-on to the SMA primarily originates in the paved areas around building 11-0030 as well as from the building's roof. Existing controls moderate this run-on source. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 222-1).

Table 222-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01502040008	Established Vegetation	-	Х	Х	-	В
W01503060009	Straw Wattle	-	Х	-	Х	В
W01503060010	Straw Wattle	-	Х	-	Х	В
W01503060011	Straw Wattle	Х	-	-	Х	В
W01503060012	Straw Wattle	Х	-	-	Х	В
W01503060016	Straw Wattle	Х	-	-	Х	В
W01503100017	Gravel Bags	Х	-	-	Х	В
W01506030004	Juniper Bales	Х	-	-	Х	CB
W01506030005	Juniper Bales	Х	-	-	Х	СВ

CB: Certified baseline control measure. B: Additional baseline control measure.

EC: Enhanced control measure.

EC: Enhanced control measure.

222.3 Storm Water Monitoring

SWMUs 11-011(a) and 11-011(b) are monitored within W-SMA-9.7. Following the installation of baseline control measures, a baseline storm water sample was collected on September 13, 2013 (Figure 222-2). Analytical results from this sample yielded the following TAL exceedance:

• Copper concentrations of 9.74 μg/L (MTAL is 4.3 μg/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 11-011(a):

• Copper is not known to have been associated with industrial materials historically managed at the Site. Copper was detected above BV in 4 of 10 shallow (i.e., less than 3 ft bgs) 2010 Consent Order soil samples at a maximum concentration 6.6 times the soil BV.

SWMU 11-011(b):

• Copper is not known to have been associated with industrial materials historically managed at the Site. Copper was detected above BVs in 2 of 11 shallow 2010 Consent Order soil samples at a maximum concentration 5.1 times the soil BV.

TAL exceedances were also evaluated against the appropriate storm water BVs, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 222-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 222-2.

Monitoring location W-SMA-9.7 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as landscapes containing sediment derived from

Bandelier Tuff. Metals including copper are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff.

Copper—The copper UTL from developed urban landscape storm water run-on is 32.3 µg/L; the copper UTL for background storm water containing sediment derived from Bandelier Tuff is 3.43 µg/L. The copper result from 2013 is between these two values.

All the analytical results for these samples are reported in the 2013 Annual Report.

222.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-9.7 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 222-2	Control Measure	Inspections during 2014
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Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38711	5-30-2014
Storm Rain Event	BMP-39848	7-17-2014
Storm Rain Event	BMP-40817	7-31-2014
Storm Rain Event	BMP-41594	8-13-2014
Annual Erosion Evaluation	COMP-43292	10-7-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 222-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-38941	Installed straw wattle above rilling on east side of juniper bale W01506030005. Raked out rill and applied seed. Installed new straw wattle directly above wattle W01503060014 as a replacement.	6-12-2014	13 day(s)	Maintenance conducted as soon as practicable.
BMP-42157	Installed new straw wattle directly upgradient of existing wattle W01503060015 as a replacement.	8-26-2014	13 day(s)	Maintenance conducted as soon as practicable.
BMP-43672	Installed gravel bags to divert storm water to existing cement swale. Filled in area of erosion with base course.	10-28-2014	21 day(s)	Maintenance conducted as soon as practicable.

222.5 Compliance Status

The Sites associated with W-SMA-9.7 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 222-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 11-011(a)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-30-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 11-011(b)	Corrective Action Initiated	Corrective Action Initiated	Initiated 10-30-2013. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.






Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 222-2 Inorganic analytical results summary plot for W-SMA-9.7

254

223.0 W-SMA-9.8: SWMU 11-005(c)

223.1 Site Descriptions

One historical industrial activity area is associated with W016, W-SMA-9.8: Site 11-005(c).

SWMU 11-005(c) is a former outfall with a capped drainline north of the former Betatron Building (11-2) at TA-11. The drainline was installed in 1944 and served a sink, a hot water heater, and a floor drain. The outfall discharged to a slightly sloped area consisting of fill from an adjacent roadbed. The drainline was capped before the drop tower complex was constructed in 1956. Building 11-2 was used as a control room for the drop tower and is currently vacant.

Phase I Consent Order sampling is complete for SWMU 11-005(c). All detected constituent concentrations were below residential SSLs and SALs. SWMU 11-005(c) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-005(c) will be eligible for a COC upon approval of the report by NMED. The project map (Figure 223-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

223.2 Control Measures

The primary source of run-on to this SMA is from the paved areas around building 11-0024 and possibly the building's roof drains. All active control measures are listed in the following table, and their locations are shown on the project map (Figure 223-1).

		Purpose of Control				Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01602040012	Established Vegetation	-	Х	Х	-	В
W01603020007	Base Course Berm	Х	-	-	Х	СВ
W01603060010	Straw Wattle	-	х	-	Х	СВ

Table 223-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

223.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-9.8. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

223.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-9.8 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 223-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38712	5-30-2014
Storm Rain Event	BMP-39849	7-17-2014
Storm Rain Event	BMP-40818	7-31-2014
Storm Rain Event	BMP-41595	8-13-2014
Annual Erosion Evaluation	COMP-43293	10-7-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 223-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-38958	Repaired berm W01603020007 by adding base course to damaged/degraded areas.	6-24-2014	, , ,	Maintenance conducted as soon as practicable.

223.5 Compliance Status

The Site associated with W-SMA-9.8 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 223-4Compliance Status during 2014

Site	Compliance Status	Compliance Status	Commonto
Site	on Jan 1, 2014	on Dec 31, 2014	Comments
SWMU 11-005(c)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment







224.0 W-SMA-9.9: SWMU 11-006(b)

224.1 Site Descriptions

One historical industrial activity area is associated with W017, W-SMA-9.9: Site 11-006(b).

SWMU 11-006(b) is one of three inactive catch basins and a former NPDES-permitted outfall (located EPA 05A069) at TA-11 near the drop tower complex. The SWMU 11-006(b) catch basin is located on the north side of the drop tower complex and consists of a concrete basin (structure 11–50) measuring 6 × 4 × 2 ft and equipped with an overflow drain. Historically, SWMU 11-006(b) received washdown water from the concrete pad and asphalt apron at the base of the drop tower via an HE sump [SWMU 11-006(a)]. Any HE particles remaining in the washdown water after it exited the sump were further filtered out in the catch basin. After exiting the catch basin, the remaining wash water was channeled to a drainage and the NPDES-permitted outfall on the northeast side of the catch basin. Waste collected from the catch basin was disposed of at the TA-16 Burning Ground. The outfall was removed from the NPDES permit in May 1998 after drop tower activities ceased. The drop tower underwent D&D in 2004. Currently, the catch basin is capped and sealed; however, the outfall still receives storm water runoff. Any runoff collected in the concrete pad and asphalt apron is now diverted to the other two catch basins associated with the former drop tower.

Phase I Consent Order sampling is complete for SWMU 11-006(b). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 11-006(b) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-006(b) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 224-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

224.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 224-1).

Enhanced controls were installed and certified on June 27, 2012, and submitted to EPA on July 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at

http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 224-1 Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01702040022	Established Vegetation	-	Х	Х	-	В
W01703010017	Earthen Berm	Х	-	-	Х	EC
W01703010018	Earthen Berm	-	Х	-	Х	EC
W01703010019	Earthen Berm	-	Х	-	Х	EC
W01703010020	Earthen Berm	-	Х	-	Х	EC
W01703090001	Curbing	Х	-	-	Х	СВ

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

224.3 Storm Water Monitoring

SWMU 11-006(b) is monitored within W-SMA-9.9. Following the installation of baseline control measures, a baseline storm water sample was collected on August 21, 2011 (Figure 224-2). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 962 μ g/L (MTAL is 750 μ g/L) and
- Gross-alpha activity of 95.9 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at W-SMA-9.9, a corrective action storm water sample was collected on September 13, 2013 (Figure 224-2). Analytical results from this corrective action monitoring sample yielded the following TAL exceedance:

• Gross-alpha activity of 74.4 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 11-006(b):

• Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, the Site is an unlikely source of the TAL exceedance.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 224-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 224-2. The SMA receives runoff from industrially developed areas and from undeveloped areas. • Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2011 and 2013 Annual Reports.

224.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-9.9 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38713	5-30-2014
Storm Rain Event	BMP-39850	7-17-2014
Storm Rain Event	BMP-40819	7-31-2014
Storm Rain Event	BMP-41596	8-13-2014
Annual Erosion Evaluation	COMP-43294	10-7-2014

Table 224-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 224-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-37037	Repaired damaged areas of berm W01703010019 with clean fill and compacted. Added a spillway in location of breach. Applied nonwoven geotextile fabric and angular rock to new spillway.	3-18-2014	179 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government -n and the onset of winter weather conditions.

224.5 Compliance Status

The Site associated with W-SMA-9.9 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 224-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 11-006(b)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 06-27-2012.







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 224-2 Inorganic analytical results summary plot for W-SMA-9.9

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

225.0 W-SMA-10: SWMUs 11-002, 11-005(a), 11-005(b), 11-006(c), 11-006(d), and 11-011(d) and AOC 11-003(b)

225.1 Site Descriptions

Seven historical industrial activity areas are associated with W018, W-SMA-10, Sites: 11-002, 11-003(b), 11-005(a), 11-005(b), 11-006(c), 11-006(d), and 11-011(d).

SWMU 11-002 is a 30-ft-diameter burn area located east of the drop tower at the edge of its asphalt apron. Beginning in 1948, this area was used as an experimental burn area for components on or in assembled configurations with HE, propellants, and jet fuel. HE and propellant burns were conducted directly on the sand pad, and jet fuel was burned within an open-top steel containment tank. Burning activities continued through 1992.

SWMU 11-002 is deferred per Table IV-2 of the Consent Order; therefore, Consent Order sampling has not been conducted at the Site. No investigations were conducted before the Consent Order went into effect in 2005.

SWMU 11-005(a) is an active septic system located at TA-11 approximately 70 ft southwest of building 11-24. This septic system consists of a septic tank (structure 11-20), associated drainlines from buildings 11-1 and 11-4, and a tile drain field that extends to an outfall on a sloped area to the south of the septic tank. The septic system began operation in 1944. The drainline from building 11-1 has been plugged. Currently, discharge to the septic system comes only from a restroom in building 11-4. Building 11-1 is currently a storage area for electrical equipment but was originally used as a control building for the Betatron Facility (building 11-2) and the Cloud Chamber (building 11-3). Building 11-4 is currently the control building for the Vibration-Test Facility (building 11-30), although it was historically used as a machine shop and photoprocessing facility. A memorandum from 1950 indicated a mercury spill occurred in building 11-4; however, the location, source, and extent of the spill are not known. The outflow drainline from SWMU 11-005(a) was plugged in 1992; since that time the septic tank has been pumped out on a regular basis.

Phase I Consent Order sampling is complete for SWMU 11-005(a). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 11-005(a) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-005(a) will be eligible for a COC upon approval of the report by NMED.

SWMU 11-005(b) is an active septic system located at TA-11, approximately 70 ft south of building 11-3. This septic system consists of a septic tank (structure 11-43), an outlet drainline to an outfall to the south of the septic tank, and a drain field west of the drainline. The septic system serves restrooms added to the exterior of building 11-3 and was tied to a floor drain in the test room of building 11-3 until 1992 when the drain was plugged. Engineering drawings confirm the drainline for floor drains in building 11-24 was tied into the septic tank in 1992. Building 11-24 houses an office and light machine shop.

Phase I Consent Order sampling is complete for SWMU 11-005(b). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 11-005(b) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area to be submitted to NMED in 2015. SWMU 11-005(b) will be eligible for a COC upon approval of the report by NMED.

SWMU 11-006(c) is one of three catch basins and its associated outfall located at TA-11 near the drop tower complex. The SWMU 11-006(c) catch basin is located on the southeast side of the drop tower complex and consists of a concrete basin (structure 11-51) measuring 6 × 4 × 2 ft and a former NPDES-permitted outfall (EPA05A096) that discharged into Water Canyon. Historically, SWMU 11-006(c) received washdown water from the concrete pad and asphalt apron at the base of the drop tower via an HE sump [SWMU 11-006(a)]. Any HE particles remaining in the washdown water after it exited the sump were further filtered out in the catch basin. After exiting the catch basin, the remaining washdown water flowed through an asphalt-lined drainage channel to a natural drainage channel and the NPDES-permitted outfall. HE waste collected from the catch basin was disposed of at the TA-16 Burning Ground. The outfall was removed from the NPDES permit in May 1998 after drop tower operations ceased and discharges to the drainage channels stopped. Any storm water runoff collected in the catch basin since 1998 is pumped to the SWMU 11-006(d) basin.

Phase I Consent Order sampling is complete for SWMU 11-006(c). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 11-006(c) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-006(c) will be eligible for a COC upon approval of the report by NMED.

SWMU 11-006(d) is one of three catch basins and its associated outfall located at TA-11 near the drop tower complex. The SWMU 11-006(d) catch basin is located on the south side of the drop tower complex and consists of a concrete basin (structure 11–52) measuring 6 × 4 × 2 ft and a former NPDESpermitted outfall (EPA05A097) that discharged to Water Canyon. Historically, SWMU 11-006(d) received washdown water from the concrete pad and asphalt apron at the base of the drop tower via an HE sump [SWMU 11-006(a)]. Any HE particles remaining in the washdown water after it exited the sump were further filtered out in the catch basin. After exiting the catch basin, the remaining washdown water flowed through an asphalt-lined drainage to a natural drainage channel and then east into Water Canyon. HE waste collected from the catch basin was disposed of at the burning grounds at TA-16. Since drop tower operations ceased in 1998, this catch basin has collected only storm water runoff that drains to the outfall.

Phase I Consent Order sampling is complete for SWMU 11-006(d). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 11-006(d) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-006(d) will be eligible for a COC upon approval of the report by NMED.

SWMU 11-011(d) is an outfall located at TA-11 south of building 11-24, the air gun facility. The outfall consisted of a 4-in. steel pipe tied to floor drains the air gun facility. Originally, operations at building 11-24 consisted of acceleration and impact tests on full-scale warhead mockups. After World War II, building 11-24 was converted to an office and light machine shop. The drainline was tied into the SWMU 11-005(d) septic tank in 1992 and all discharges to the outfall ceased.

Phase I Consent Order sampling is complete for SWMU 11-011(d). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order samples were below residential SSLs/SALs. SWMU 11-011(d) will be recommended for corrective action complete in the supplemental investigation report for S-Site Aggregate Area, to be submitted to NMED in 2015. SWMU 11-011(d) will be eligible for a COC upon approval of the report by NMED.

AOC 11-003(b) is a former mortar impact area used as a target by the decommissioned air gun facility (building 11-24). This AOC is located immediately adjacent to the inactive drop tower complex at TA-11 (K-Site). The air gun facility was completed in 1956. The gun was used to launch experimental packages into targets located south of building 11-24. The targets, located 150–250 ft south of building 11-24, were 12-ft²-, 12-in.-thick concrete slabs set in line with the gun bore. Firing into the targets tested various weapons packages designed to withstand extremes of acceleration and deceleration. Some devices contained HE and DU. On a single occasion in 1972, an impact test involved an inert mockup consisting of a 12-in.-diameter, hollow-steel sphere filled with steel or lead ball bearings suspended in a graphite matrix. The sphere fractured upon impact, potentially leaving behind 0.5-in.-diameter steel or lead balls.

AOC 11-003(b) is deferred per Table IV-2 of the Consent Order; therefore, Consent Order sampling has not been conducted at the Site. No investigations were conducted before the Consent Order went into effect in 2005.

The project map (Figure 225-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

225.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 225-1).

Enhanced controls were installed and certified on August 23, 2012, and submitted to EPA on September 20, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

		Purpose of Control				Control
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01802040025	Established Vegetation	-	х	Х	-	В
W01803010022	Earthen Berm	-	Х	-	х	EC
W01803010023	Earthen Berm	-	Х	-	Х	EC
W01803010024	Earthen Berm	-	Х	-	Х	EC
W01803040010	Asphalt Berm	х	-	-	Х	СВ
W01803040016	Asphalt Berm	Х	-	-	Х	СВ
W01803090002	Curbing	х	-	-	Х	СВ
W01804060004	Rip Rap	-	-	Х	-	СВ
W01804060013	Rip Rap	х	-	х	-	СВ

Table 225-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

225.3 Storm Water Monitoring

SWMUs 11-002, 11-005(a), 11-005(b), 11-006(c), 11-006(d), and 11-011(d) and AOC 11-003(b) are monitored within W-SMA-10. Following the installation of baseline control measures, a baseline confirmation sample was collected on August 21, 2011 (Figure 225-2). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 106 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 11-002:

 Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. No investigations have been conducted at this Site.

Based on the Site history and sampling data, the Site is an unlikely source of the TAL exceedance.

SWMU 11-005(a):

• Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, SWMU 11-005(a) is an unlikely source of the TAL exceedance

SWMU 11-005(b):

 Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, SWMU 11-005(b) is an unlikely source of the TAL exceedance.

SWMU 11-006(c):

 Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, SWMU 11-006(c) is an unlikely source of the TAL exceedance.

SWMU 11-006(d):

 Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides. Based on the Site history and Consent Order sampling data, SWMU 11-006(d) is an unlikely source of the TAL exceedance.

SWMU 11-011(d):

• Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, SWMU 11-011(d) is an unlikely source of the TAL exceedance.

AOC 11-003(b):

• Alpha-emitting radionuclides are not known to be associated industrial materials historically managed at the Site. No investigations have been conducted at this Site. Based on the Site history, AOC 11-003(b) is an unlikely source of the TAL exceedance.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 225-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 225-2.

Monitoring location W-SMA-10 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

• Gross alpha—The gross-alpha UTL for storm water containing sediments derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The gross-alpha result from 2011 is between these two values.

All the analytical results for these samples are reported in the 2011 Annual Report.

225.4 Inspections and Maintenance

RG257 recorded six storm events at W-SMA-10 during the 2014 season. These rain events triggered four post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Table 225-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38703	5-30-2014
Storm Rain Event	BMP-39840	7-17-2014
Storm Rain Event	BMP-40809	7-31-2014
Storm Rain Event	BMP-41586	8-13-2014
Annual Erosion Evaluation	COMP-43295	10-7-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 225-3Maintenance during 2014

Maintenance	Maintenance Conducted	Maintenance	Response	Response
Reference		Date	Time	Discussion
BMP-38938	Repaired earthen berms W01803010022, W01803010023, and W01803010024 by removing needle cast and debris from spillways.	6-12-2014	13 day(s)	Maintenance conducted as soon as practicable.

225.5 Compliance Status

The Sites associated with W-SMA-10 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 225-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 11-002	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012
AOC 11-003(b)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012
SWMU 11-005(a)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012
SWMU 11-005(b)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012
SWMU 11-006(c)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012
SWMU 11-006(d)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012
SWMU 11-011(d)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 8-23-2012





269



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 225-2 Inorganic analytical results summary plot for W-SMA-10

226.0 W-SMA-11.7: AOC 49-008(c)

226.1 Site Descriptions

One historical industrial activity area is associated with W019, W-SMA-11.7: Site 49-008(c).

AOC 49-008(c) consists of an area of potentially contaminated soil from historical radiochemistry operations and small-scale containment experiments at Area 11 within the northern portion of the MDA AB NES boundary at TA-49. Area 11 is approximately 220 × 300 ft. Activities conducted at Area 11 from 1959 to 1961 supported hydronuclear experiments conducted elsewhere at TA-49. Radiochemistry operations were conducted in a former laboratory and change house (former building 49-15) that was the main structure at Area 11. Other structures included a small storage building, latrines, and butane and propane tanks. The former building 49-15 laboratory was used to analyze samples collected during experiments in the experimental shafts at Areas 2, 2A, 2B, and 4. Laboratory processes included sample dissolution in acids (nitric, hydrochloric, hydrofluoric, sulfuric, and perchloric) and solvent extraction using methyl isobutyl ketone, ammonium hydroxide, and sodium hydroxide. Wastes generated during radiochemical operations were typically collected in containers and taken to radioactive waste disposal facilities elsewhere at the Laboratory. Interim waste storage boxes were stored south of former building 49-15. Small-scale containment experiments were conducted in 13 underground shafts located on the west side of Area 11. These shafts were drilled to a depth of 12 ft and lined with 10-in.-diameter steel casing. HE was placed in the shafts, which were backfilled to contain the explosions. Small amounts of irradiated uranium-238 tracer were used in some experiments. The structures in Area 11 were decontaminated and removed in 1970 and 1971. Radiological contamination was detected in sinks, ducts, and hoods in former building 49-15. Contaminated debris was removed and disposed of at TA-54 and uncontaminated debris (approximately 2160 ft^3) was taken to the open-burning/landfill area at Area 6 (SWMU 49-004).

During the 1987 soil and vegetation radiological-screening survey of TA-49, 22 surface samples were collected from within Area 11, and 20 vegetation samples were collected within and around Area 11. The samples were analyzed for radionuclides, and the results showed radionuclides detected at background levels for most sampling locations; however, elevated levels of americium-241 and plutonium and uranium isotopes were present in a sample from a location next to the east corner of former building 49-15, possibly where the sink drain was located. Vegetation samples showed no elevated radioactivity.

Phase I Consent Order sampling is complete for AOC 49-008(c). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order and RFI samples were below residential SSLs and SALs. AOC 49-008(c) will be recommended for corrective action complete in the supplemental investigation report for TA-49 Sites inside the NES boundary, to be submitted to NMED in 2015. AOC 49-008(c) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 226-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

226.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 226-1).

Enhanced controls were installed and certified on October 23, 2012, and submitted to EPA on October 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 226-1	Active Co	ontrol Measures
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		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W01902040052	Established Vegetation	-	Х	Х	-	В
W01903010040	Earthen Berm	Х	-	-	Х	В
W01903010041	Earthen Berm	-	Х	-	Х	EC
W01903010042	Earthen Berm	-	Х	-	Х	EC
W01903010043	Earthen Berm	-	Х	-	Х	EC
W01903010044	Earthen Berm	-	Х	-	Х	EC
W01903010045	Earthen Berm	-	Х	-	Х	EC
W01903010046	Earthen Berm	-	Х	-	Х	EC
W01903010047	Earthen Berm	-	Х	-	Х	EC
W01903010048	Earthen Berm	-	Х	-	Х	EC
W01903010049	Earthen Berm	-	Х	-	Х	EC
W01903010050	Earthen Berm	-	Х	-	Х	EC
W01904010051	Earthen Channel/Swale	Х	-	х	-	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

226.3 Storm Water Monitoring

AOC 49-008(c) is monitored within W-SMA-11.7. Following the installation of baseline control measures, a baseline storm water sample was collected on September 1, 2011 (Figure 226-2). Analytical results from this sample yielded the following TAL exceedances:

- Aluminum concentration of 1020 μg/L (MTAL is 750 μg/L) and
- Gross-alpha activity of 38.1 pCi/L (ATAL is 15 pCi/L).

Following the installation of enhanced control measures at W-SMA-11.7, a corrective action storm water sample was collected on September 13, 2013 (Figure 226-2). Analytical results from this corrective action monitoring sample yielded the following TAL exceedance:

• Gross-alpha activity of 39.6 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

AOC 49-008(c):

 Alpha-emitting radionuclides are known to have been associated with industrial materials historically managed at SWMU 49-008(c). Shallow Consent Order and RFI samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Site history and Consent Order sampling results indicate the Site is an unlikely source of the TAL exceedance.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 226-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 226-2.

W-SMA-11.7 receives runoff from former industrially developed and undeveloped areas.

 Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2011 and 2013 Annual Reports.

226.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at W-SMA-11.7 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38724	5-30-2014
Storm Rain Event	BMP-39074	6-17-2014
Storm Rain Event	BMP-39357	6-25-2014
Storm Rain Event	BMP-40087	7-17-2014
Storm Rain Event	BMP-41079	8-8-2014
Storm Rain Event	BMP-42053	8-18-2014
Storm Rain Event	BMP-42660	9-15-2014
Storm Rain Event	BMP-43150	10-14-2014
Annual Erosion Evaluation	COMP-43296	10-31-2014

Table 226-2Control Measure Inspections during 2014

Maintenance activities conducted at the SMA are summarized in the following table.

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Table 226-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-36930	Moved downed tree from berm W01903010045. Repaired breach and erosion on back of berm W01903010045 by removing TRM. Added clean fill and compacted. Applied seed and TRM to repaired areas. Repaired spillway erosion on berms W01903010048 and W01903010049 by removing matting. Applied seed to berms, nonwoven geotextile fabric on spillway and TRM on berms and spillways. Repaired channel W01904010051 by reblading the south side of dirt access road to remove sediment and recontour the road ditch for the entire length of W01904010051.	5-21-2014	243 day(s)	Maintenance initiated as a result of the September 2013 1000-yr rain event was delayed by the federal government shutdown and the onset of winter weather conditions.

226.5 Compliance Status

The Site associated with W-SMA-11.7 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 226-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 49-008(c)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 10-23-2012.





2014 Update to the SDPPP, Revision 1



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 226-2 Inorganic analytical results summary plot for W-SMA-11.7

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

227.0 W-SMA-12.05: SWMU 49-001(g)

227.1 Site Descriptions

One historical industrial activity area is associated with W020, W-SMA-12.05: Site 49-001(g).

SWMU 49-001(g) is an area of contaminated surface soil at TA-49, north and east of MDA AB, resulting from the transport of surface and near-surface radionuclide contamination associated with an historical release from shaft 2-M at Area 2 (MDA AB). SWMU 49-001(g), the area of highest runoff and erosion potential, is located on a slope that runs from the mesa-top portion of the MDA AB NES north to the bottom of Water Canyon. Erosion-control BMPs were installed at the Site in 1999 and are routinely inspected and maintained.

Phase I Consent Order sampling is complete for SWMU 49-001(g). All detected constituents in Consent Order samples were below residential SSLs and SALs. SWMU 49-001(g) will be recommended for corrective action complete in the supplemental investigation report for TA-49 Sites inside the NES boundary, to be submitted to NMED in 2015. SWMU 49-001(g) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 227-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-</u><u>stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

227.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 227-1).

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W02002040018	Established Vegetation	-	х	х	-	В
W02003010015	Earthen Berm	-	Х	-	Х	В
W02003010016	Earthen Berm	-	Х	-	Х	В
W02003010017	Earthen Berm	-	Х	-	Х	В
W02004060002	Rip Rap	х	-	х	-	СВ
W02006010001	Rock Check Dam	-	Х	-	Х	СВ

Table 227-1 Active Control Measures

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

227.3 Storm Water Monitoring

Through calendar year 2014, storm water flow has not been sufficient for full-volume sample collection at W-SMA-12.05. Initial confirmation sampling will continue until one confirmation sample is collected from this SMA.

227.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at W-SMA-12.05 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38727	5-28-2014
Storm Rain Event	BMP-39077	6-10-2014
Storm Rain Event	BMP-39360	6-25-2014
Storm Rain Event	BMP-40090	7-17-2014
Storm Rain Event	BMP-41082	8-7-2014
Storm Rain Event	BMP-42056	8-18-2014
Storm Rain Event	BMP-42663	9-15-2014
Storm Rain Event	BMP-43153	10-14-2014
Annual Erosion Evaluation	COMP-43352	10-31-2014

Maintenance activities conducted at the SMA are summarized in the following table.

Table 227-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-43565	Repaired second southerly rock check dam in W02006010001 by adding native rock to extend both ends.	10-20-2014	6 day(s)	Maintenance conducted as soon as practicable.

227.5 Compliance Status

The Site associated with W-SMA-12.05 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 227-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 49-001(g)	Baseline Monitoring Extended	Baseline Monitoring Extended	No Comment





228.0 W-SMA-14.1: SWMU 15-014(l) and AOC 15-004(h)

228.1 **Site Descriptions**

Two historical industrial activity areas are associated with W021, W-SMA-14.1: Sites 15-014(I), and 15-004(h).

SWMU 15-014(I) is a drainline and formerly permitted outfall (EPA 03A028) for a cooling tower (structure 15-202) located within the PHERMEX facility in TA-15. This drainline and outfall received blowdown discharge from the cooling tower that was built in 1961. It is not known if the outfall is still active.

Consent Order investigations have not been performed at SWMU 15-014(I). SWMU 15-014(I) will be included in the future Consent Order Lower Water/Indio Canyons Aggregate Area investigation. No investigations were conducted at SWMU 15-014(I) before the Consent Order went into effect in 2005.

AOC 15-004(h) is inactive Firing Site H located west of the PHERMEX facility at TA-15. Firing Site H is located approximately 100 ft north of the power control building for PHERMEX (structure 15-185). This firing site was built in 1948 and included an instrument chamber (structure 15-17) and a camera chamber (structure 15-92) and was used for explosives testing. The exact nature of the materials used during tests is not known but is believed to include DU, beryllium, lead, and HE. Firing site operations were discontinued in 1953. The surface of the Site was reportedly regraded in 1992. The camera chamber (structure 15-92) remains on-site.

Consent Order investigations have not been performed at SWMU 15-004(h). AOC 15-004(h) will be included in the future Consent Order Lower Water/Indio Canyons Aggregate Area investigation. No investigations were conducted at AOC 15-004(h) before the Consent Order went into effect in 2005.

The project map (Figure 228-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: http://www.lanl.gov/community-environment/environmentalstewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php.

228.2 **Control Measures**

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 228-1).

Enhanced controls were installed and certified on September 25, 2012, and submitted to EPA on October 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W02102040021	Established Vegetation	-	Х	Х	-	В
W02103010016	Earthen Berm	-	Х	-	Х	EC
W02103010017	Earthen Berm	-	Х	-	Х	EC
W02103010018	Earthen Berm	-	Х	-	Х	EC
W02103010019	Earthen Berm	-	Х	-	Х	EC
W02103010020	Earthen Berm	Х	-	-	Х	EC
W02104060014	Rip Rap	х	-	Х	-	СВ
W02106010008	Rock Check Dam	Х	-	-	Х	СВ
W02106010009	Rock Check Dam	Х	-	-	Х	СВ
W02106010010	Rock Check Dam	х	-	-	Х	СВ
W02106010011	Rock Check Dam	х	-	-	Х	СВ
W02106010012	Rock Check Dam	-	Х	-	Х	CB

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

228.3 Storm Water Monitoring

SWMU 15-014(I) and AOC 15-004(h) are monitored within W-SMA-14.1. Following the installation of baseline control measures, two baseline storm water samples were collected on July 25, 2011, and August 18, 2011 (Figures 228-2 and 228-3). Analytical results from these samples yielded the following TAL exceedances:

- Copper concentrations of 20 μ g/L and 42.6 μ g/L (MTAL is 4.3 μ g/L) and
- Zinc concentration of 49.3 μ g/L (MTAL is 42 μ g/L).

Following the installation of enhanced control measures at W-SMA-14.1, corrective action storm water samples were collected on September 13, 2013, and July 15, 2014 (Figures 228-2 and 228-3). Analytical results from these corrective action monitoring samples yielded the following TAL exceedances:

• Gross-alpha activity of 38.7 pCi/L and 96.2 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 15-014(I):

• Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.

AOC 15-004(h):

• Alpha-emitting radionuclides are known to have been associated with industrial materials historically managed at this Site. No investigations have been conducted at this Site.

VOLUME 4: WATER/CANON DE VALLE WATERSHED
Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figures 228-2 and 228-3. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots,



roads, and associated features, and are labeled "Developed Background" in Figures 228-2 and 228-3.

Monitoring location W-SMA-14.1 receives storm water run-on from developed environments, including paved parking lots, roads, and buildings, as well as locations with sediment derived from Bandelier Tuff. Metals including copper and zinc are associated with building materials, parking lots, and automobiles as well as low concentrations in the Bandelier Tuff.

 Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2013 and 2014 gross-alpha results are between these two values.

All the analytical results for these samples are reported in the 2011, 2013, and 2014 Annual Reports.

228.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at W-SMA-14.1 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.

Inspection Type	Inspection Reference	Inspection Date	
Storm Rain Event	BMP-38725	6-4-2014	
Storm Rain Event	BMP-39075	6-17-2014	
Storm Rain Event	BMP-39358	6-26-2014	
Storm Rain Event	BMP-40088	7-10-2014	
Storm Rain Event	BMP-40476	7-28-2014	
Storm Rain Event	BMP-41230	8-12-2014	
Storm Rain Event	BMP-42661	9-16-2014	
Storm Rain Event	BMP-43151	10-6-2014	
Annual Erosion Evaluation	COMP-43219	10-6-2014	
TAL Exceedance	COMP-42740	10-6-2014	

Table 228-2Control Measure Inspections during 2014

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Maintenance activities conducted at the SMA are summarized in the following table.

Table 228-3Maintenance during 2014

Maintenance Reference	Maintenance Conducted	Maintenance Date	Response Time	Response Discussion
BMP-42160	Removed needle cast from berm W02103010020 and rock check dams W02106010010, W02106010011, and W02106010012 and placed outside channel.	9-2-2014	21 day(s)	Maintenance conducted as soon as practicable.
BMP-42974	Removed needle cast from berm W02103010020 spillway and rock check dams W02106010010 and W02106010011. Placed outside of channel.	9-30-2014	14 day(s)	Maintenance conducted as soon as practicable.

228.5 Compliance Status

The Sites associated with W-SMA-14.1 are Moderate Priority Sites. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 228-4Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
AOC 15-004(h)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 8-25-2014. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.
SWMU 15-014(I)	Enhanced Control Corrective Action Monitoring	Corrective Action Initiated after second TAL exceedance	Second initiation on 8-25-2014. Permit screening process for corrective action recommendation: Submit alternative compliance request to EPA.

Further details regarding compliance status and planned activities can be found in Attachment 6 for Sites in this SMA.





Figure 228-1 W-SMA-14.1 location map



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 228-2 Inorganic analytical results summary plot for W-SMA-14.1

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015



Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 228-3 Organic analytical results summary plot for W-SMA-14.1

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

229.0 W-SMA-15.1: SWMU 49-005(a)

229.1 Site Descriptions

One historical industrial activity area is associated with W022, W-SMA-15.1: Site 49-005(a).

SWMU 49-005(a) is an inactive landfill located east of Area 10. The landfill, described as a small pit, was constructed north of the road that runs east from Area 10 and is approximately 50–100 ft northeast of the Area 10 experimental chamber and shafts (AOC 49-002). SWMU 49-005(a) was constructed in 1984 as a disposal area for nonradiologically contaminated debris generated during the 1984 general surface cleanup of TA-49.

Phase I Consent Order sampling is complete for SWMU 49-005(a). All detected inorganic and organic chemical concentrations and radionuclide activities from Consent Order and RFI samples were below residential SSLs and SALs. SWMU 49-005(a) will be recommended for corrective action complete in the supplemental investigation report for the TA-49 Sites outside the NES boundary, to be submitted to NMED in 2015. SWMU 49-005(a) will be eligible for a COC upon approval of the report by NMED.

The project map (Figure 229-1) is located at the end of this SMA update. Any future map updates will be posted on the IP website: <u>http://www.lanl.gov/community-environment/environmental-stewardship/protection/compliance/individual-permit-stormwater/site-monitoring-area-maps.php</u>.

229.2 Control Measures

All active control measures are listed in the following table, and their locations are shown on the project map (Figure 229-1).

Enhanced controls were installed and certified on October 23, 2012, and submitted to EPA on October 25, 2012, as part of corrective action. Photographs of the enhanced controls are available at http://www.lanl.gov/community-environment/environmental-

stewardship/protection/compliance/individual-permit-stormwater/construction-certifications.php.

Table 229-1Active Control Measures

		Purpose of Control			Control	
Control ID	Control Name	Run-On	Runoff	Erosion	Sediment	Status
W02202040006	Established Vegetation	-	х	х	-	В
W02203010004	Earthen Berm	Х	-	-	Х	EC
W02203010005	Earthen Berm	-	Х	-	Х	EC

CB: Certified baseline control measure.

B: Additional baseline control measure.

EC: Enhanced control measure.

229.3 Storm Water Monitoring

SWMU 49-005(a) is monitored within W-SMA-15.1. Following the installation of baseline control measures, a baseline confirmation sample was collected on September 1, 2011 (Figure 229-2). Inorganic analytical results from this baseline sample yielded the following TAL exceedance:

• Gross-alpha activity of 33.2 pCi/L (ATAL is 15 pCi/L).

Site history and shallow (i.e., less than 3 ft bgs) soil sampling data (where available) are used to determine whether the TAL exceedance constituent(s) may be related to historical industrial activities. The discussion is organized by Site and TAL exceedance constituent.

SWMU 49-005(a):

 Alpha-emitting radionuclides are not known to be associated with industrial materials historically managed at SWMU 49-005(a). Shallow Consent Order samples were not analyzed for gross-alpha radioactivity but were analyzed for americium-241 and plutonium and uranium isotopes, which are alpha-emitting radionuclides.

Based on the Site history and Consent Order sampling data, the Site is an unlikely source of the TAL exceedance.

TAL exceedances were also evaluated against the appropriate storm water BV, that is, "Bandelier Tuff background" for undisturbed SMAs or "developed background" for urban settings. BVs are expressed as UTLs using the approved EPA method for calculating BVs. UTLs for undisturbed SMAs were derived from storm water runoff containing entrained sediments derived from Bandelier Tuff and are labeled "Bandelier Tuff Background" in Figure 229-2. UTLs developed for urban settings were derived from runoff from developed landscapes on the Pajarito Plateau, including buildings, parking lots, roads, and associated features, and are labeled "Developed Background" in Figure 229-2.

W-SMA-15.1 receives runoff from portions of the inactive landfill and from undeveloped areas. Gross alpha in Bandelier Tuff is associated with naturally occurring radioactive uranium- and thorium-bearing minerals.

• Gross alpha—The gross-alpha UTL for background storm water containing sediment derived from Bandelier Tuff is 1490 pCi/L, and the gross-alpha background storm water UTL for storm water run-on from a developed urban landscape is 32.5 pCi/L. The 2011 gross-alpha result is between these two values.

All the analytical results for these samples are reported in the 2011 Annual Report.

229.4 Inspections and Maintenance

RG262.4 recorded 12 storm events at W-SMA-15.1 during the 2014 season. These rain events triggered 8 post-storm inspections. Post-storm inspections and all other inspection activity conducted at the SMA are summarized below.
Table 229-2Control Measure Inspections during 2014

Inspection Type	Inspection Reference	Inspection Date
Storm Rain Event	BMP-38726	5-28-2014
Storm Rain Event	BMP-39076	6-10-2014
Storm Rain Event	BMP-39359	6-25-2014
Storm Rain Event	BMP-40089	7-17-2014
Storm Rain Event	BMP-41081	8-7-2014
Storm Rain Event	BMP-42055	8-18-2014
Storm Rain Event	BMP-42662	9-15-2014
Storm Rain Event	BMP-43152	10-14-2014
Annual Erosion Evaluation	COMP-43353	10-31-2014

No maintenance activities or facility modifications affecting discharge were conducted at W-SMA-15.1 in 2014.

229.5 Compliance Status

The Site associated with W-SMA-15.1 is a Moderate Priority Site. Corrective action is to be certified complete within 5 yr of the effective date of the IP (i.e., November 2015).

Table 229-3Compliance Status during 2014

Site	Compliance Status on Jan 1, 2014	Compliance Status on Dec 31, 2014	Comments
SWMU 49-005(a)	Enhanced Control Corrective Action Monitoring	Enhanced Control Corrective Action Monitoring	Initiated 10-23-2012.







Bold font indicates result>TAL/MQL; italic font and hollow symbols indicate undetected results; "-" is used if no analytical results were available.

Figure 229-2 Inorganic analytical results summary plot for W-SMA-15.1

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Attachment 1 Amendments

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.915	1/14/2014	CDV-SMA-8	Retire Control - Damaged and/or Replaced - Control ID: V01406010005	T	CCN - 37262
V4.917	1/14/2014	CDV-SMA-8	Retire Control - Damaged and/or Replaced - Control ID: V01406010006	T	CCN - 37262
V4.918	1/14/2014	CDV-SMA-8	New Control - Augment Existing - Control ID: V01406010011	Т	CCN - 37262
V4.919	1/14/2014	CDV-SMA-8	Retire Control - Damaged and/or Replaced - Control ID: V01403010007	Т	CCN - 37262
V4.920	1/14/2014	CDV-SMA-8	New Control - Augment Existing - Control ID: V01403010012	т	CCN - 37262
V4.921	1/14/2014	CDV-SMA-8	Map Revision - (R6)	т	CCN - 37262
V4.922	2/11/2014	W-SMA-15.1	Errata - Update mainconn with correct asset ID for BMP W02202040006 made as CCN-32003. No map revision was necessary.	Т	CCN - 37548
V4.923	2/20/2014	W-SMA-7	Errata - Update mainconn with correct asset ID for BMP W00801010022 made as CCN-32650. No map revision was necessary.	Т	CCN - 37561
V4.924	4/3/2014	PT-SMA-0.5	Map Revision - (R6)	Т	CCN - 38033
V4.925	4/3/2014	CDV-SMA-8	Map Revision - (R7)	Т	CCN - 38038
V4.926	4/30/2014	PT-SMA-0.5	New Control - Augment Existing - Control ID: 100104030012	Т	CCN - 37418
V4.927	4/30/2014	PT-SMA-0.5	Map Revision - (R7)	Т	CCN - 37418
V4.928	6/4/2014	PT-SMA-4.2	New Control - Augment Existing - Control ID: I00703120009	Т	CCN - 38579
V4.929	6/4/2014	PT-SMA-4.2	Map Revision - (R7)	Т	CCN - 38579
V4.930	6/5/2014	CDV-SMA-2.5	Retire Control - Lifecycle Expired - Control ID: V00906010015	Т	CCN - 38980
V4.931	6/5/2014	CDV-SMA-2.5	Retire Control - Lifecycle Expired - Control ID: V00906010016	Т	CCN - 38980
V4.932	6/5/2014	CDV-SMA-2.5	Retire Control - Lifecycle Expired - Control ID: V00906010017	Т	CCN - 38980
V4.933	6/5/2014	CDV-SMA-2.5	Retire Control - Lifecycle Expired - Control ID: V00906010018	Т	CCN - 38980
V4.934	6/5/2014	CDV-SMA-2.5	Retire Control - Lifecycle Expired - Control ID: V00906010028	Т	CCN - 38980
V4.935	6/5/2014	CDV-SMA-2.5	Map Revision - (R9)	Т	CCN - 38980
V4.936	6/20/2014	W-SMA-9.7	Retire Control - Damaged and/or Replaced - Control ID: W01503060014	т	CCN - 39230

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.937	6/20/2014	W-SMA-9.7	New Control - Augment Existing - Control ID: W01503060015	т	CCN - 39230
V4.938	6/20/2014	W-SMA-9.7	Map Revision - (R8)	Т	CCN - 39230
V4.939	7/14/2014	CDV-SMA-2.3	Retire Control - Damaged and/or Replaced - Control ID: V00706010016	Т	CCN - 39442
V4.940	7/14/2014	CDV-SMA-2.3	New Control - Augment Existing - Control ID: V00706010024	т	CCN - 39442
V4.941	7/14/2014	CDV-SMA-2.3	New Control - Augment Existing - Control ID: V00706010025	т	CCN - 39442
V4.942	7/14/2014	CDV-SMA-2.3	Map Revision - (R13)	т	CCN - 39442
V4.943	7/14/2014	CDV-SMA-2.5	Retire Control - Damaged and/or Replaced - Control ID: V00906010022	т	CCN - 39560
V4.944	7/14/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010037	т	CCN - 39560
V4.945	7/14/2014	CDV-SMA-2.5	Map Revision - (R10)	т	CCN - 39560
V4.946	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100303060004	т	CCN - 32351
V4.947	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100303060012	т	CCN - 32351
V4.948	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100303060013	т	CCN - 32351
V4.949	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100303060015	т	CCN - 32351
V4.950	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100303060016	т	CCN - 32351
V4.951	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100306010010	т	CCN - 32351
V4.952	7/16/2014	PT-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: 100306010011	т	CCN - 32351
V4.953	7/16/2014	PT-SMA-0.5	New Control - Corrective Action - Control ID: I00303010018	Т	CCN - 32351
V4.954	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00305040019	т	CCN - 32351
V4.955	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00306010020	т	CCN - 32351
V4.956	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00306010021	т	CCN - 32351
V4.957	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00306010022	т	CCN - 32351
V4.958	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00306010023	т	CCN - 32351
V4.959	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00306010024	т	CCN - 32351
V4.960	7/16/2014	PT-SMA-1.7	New Control - Corrective Action - Control ID: I00306010025	т	CCN - 32351

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V4.961	7/16/2014	PT-SMA-1.7	Minor Sampler Adjustment, Updated Coordinates in Attach D.	Т	CCN - 32351
V4.962	7/16/2014	PT-SMA-1.7	SMA Boundary Modification	т	CCN - 32351
V4.963	7/16/2014	PT-SMA-1.7	Map Revision - (R9)	т	CCN - 32351
V4.964	7/16/2014	F-SMA-2	Map Revision - (R9)	т	CCN - 38832
V4.965	7/16/2014	CDV-SMA-2.41	Retire Control - Lifecycle Expired - Control ID: V00803060002	Т	CCN - 30579
V4.966	7/16/2014	CDV-SMA-2.41	Retire Control - Lifecycle Expired - Control ID: V00804060009	Т	CCN - 30579
V4.967	7/16/2014	CDV-SMA-2.41	Retire Control - Lifecycle Expired - Control ID: V00806030007	т	CCN - 30579
V4.968	7/16/2014	CDV-SMA-2.41	Retire Control - Lifecycle Expired - Control ID: V00806030008	т	CCN - 30579
V4.969	7/16/2014	CDV-SMA-2.41	New Control - Corrective Action - Control ID: V00806010012	т	CCN - 30579
V4.970	7/16/2014	CDV-SMA-2.41	New Control - Corrective Action - Control ID: V00803010013	т	CCN - 30579
V4.971	7/16/2014	CDV-SMA-2.41	New Control - Corrective Action - Control ID: V00804010014	т	CCN - 30579
V4.972	7/16/2014	CDV-SMA-2.41	SMA Boundary Modification	Т	CCN - 30579
V4.973	7/16/2014	CDV-SMA-2.41	Map Revision - (R6)	т	CCN - 30579
V4.974	8/7/2014	PT-SMA-3	Retire Control - Damaged and/or Replaced - Control ID: 100503060011	т	CCN - 41656
V4.975	8/7/2014	PT-SMA-3	Retire Control - Damaged and/or Replaced - Control ID: 100503060012	т	CCN - 41656
V4.976	8/7/2014	PT-SMA-3	New Control - Augment Existing - Control ID: 100503060013	т	CCN - 41656
V4.977	8/7/2014	PT-SMA-3	New Control - Augment Existing - Control ID: 100503060014	т	CCN - 41656
V4.978	8/7/2014	PT-SMA-3	Map Revision - (R9)	т	CCN - 41656
V4.979	8/20/2014	W-SMA-1.5	Retire Control - Damaged and/or Replaced - Control ID: W00203060004	т	CCN - 42179
V4.980	8/20/2014	W-SMA-1.5	New Control - Routine/Replacement - Control ID: W00203060018	Т	CCN - 42179
V4.981	8/20/2014	W-SMA-1.5	Map Revision - (R8)	Т	CCN - 42179
V4.982	8/20/2014	PT-SMA-1.7	New Control - Augment Existing - Control ID: 100306010026	т	CCN - 42183
V4.983	8/20/2014	PT-SMA-1.7	Map Revision - (R10)	Т	CCN - 42183
V4.984	9/2/2014	W-SMA-9.7	Retire Control - Damaged and/or Replaced - Control ID: W01503060015	т	CCN - 42385

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V4.985	9/2/2014	W-SMA-9.7	New Control - Routine/Replacement - Control ID: W01503060016	Т	CCN - 42385
V4.986	9/2/2014	W-SMA-9.7	Map Revision - (R9)	Т	CCN - 42385
V4.987	9/4/2014	CDV-SMA-1.7	Minor Sampler Adjustment, Updated Coordinates in Attach D.	Т	CCN - 42517
V4.988	9/17/2014	PT-SMA-3	Retire Control - Damaged and/or Replaced - Control ID: 100503060014	Т	CCN - 42923
V4.989	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010019	Т	CCN - 42923
V4.990	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010020	Т	CCN - 42923
V4.991	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010021	т	CCN - 42923
V4.992	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010022	Т	CCN - 42923
V4.993	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010023	Т	CCN - 42923
V4.994	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010024	Т	CCN - 42923
V4.995	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010025	Т	CCN - 42923
V4.996	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010026	Т	CCN - 42923
V4.997	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00506010027	Т	CCN - 42923
V4.998	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00503120015	Т	CCN - 42923
V4.999	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00504030016	Т	CCN - 42923
V4.1000	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00503060017	Т	CCN - 42923
V4.1001	9/17/2014	PT-SMA-3	New Control - Augment Existing - Control ID: I00503060018	Т	CCN - 42923
V4.1003	9/24/2014	CDV-SMA-2.41	Map Revision - (R8)	Т	CCN - 43028
V4.1004	9/24/2014	CDV-SMA-7	New Control - Augment Existing - Control ID: V01304040009	т	CCN - 43012
V4.1005	9/24/2014	CDV-SMA-7	Map Revision - (R4)	Т	CCN - 43012
V4.1006	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00506010019	Т	CCN - 43011
V4.1007	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00506010020	Т	CCN - 43011
V4.1008	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00506010021	Т	CCN - 43011
V4.1009	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00506010022	Т	CCN - 43011

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V4.1010	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00504010018	т	CCN - 43011
V4.1012	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00503060025	Т	CCN - 43011
V4.1013	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00506020023	Т	CCN - 43011
V4.1014	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00504040017	Т	CCN - 43011
V4.1015	9/24/2014	CDV-SMA-1.7	New Control - Augment Existing - Control ID: V00504060026	Т	CCN - 43011
V4.1016	9/24/2014	CDV-SMA-1.7	Map Revision - (R7)	Т	CCN - 43011
V4.1017	10/20/2014	W-SMA-9.8	Map Revision - (R7)	Т	CCN - 43636
V4.1018	10/20/2014	CDV-SMA-3	Map Revision - (R10)	Т	CCN - 43640
V4.1019	10/24/2014	CDV-SMA-1.2	Map Revision - (R8)	Т	CCN - 43819
V4.1020	10/24/2014	CDV-SMA-1.3	Map Revision - (R5)	Т	CCN - 43820
V4.1021	10/24/2014	PT-SMA-0.5	Map Revision - (R8)	Т	CCN - 43815
V4.1022	10/24/2014	PT-SMA-2.01	Map Revision - (R6)	Т	CCN - 43816
V4.1023	10/24/2014	W-SMA-3.5	New Control - Augment Existing - Control ID: W00403060009	Т	CCN - 43360
V4.1024	10/24/2014	W-SMA-3.5	Map Revision - (R5)	Т	CCN - 43360
V4.1025	10/24/2014	W-SMA-7	Retire Control - Damaged and/or Replaced - Control ID: W00803060020	Т	CCN - 43803
V4.1026	10/24/2014	W-SMA-7	Retire Control - Damaged and/or Replaced - Control ID: W00803060021	Т	CCN - 43803
V4.1027	10/24/2014	W-SMA-7	New Control - Routine/Replacement - Control ID: W00803060024	Т	CCN - 43803
V4.1028	10/24/2014	W-SMA-7	New Control - Routine/Replacement - Control ID: W00803060025	Т	CCN - 43803
V4.1029	10/24/2014	W-SMA-7	Map Revision - (R8)	Т	CCN - 43803
V4.1030	10/30/2014	W-SMA-5	New Control - Augment Existing - Control ID: W00606010031	т	CCN - 43935
V4.1031	10/30/2014	W-SMA-5	New Control - Augment Existing - Control ID: W00606010032	т	CCN - 43935
V4.1032	10/30/2014	W-SMA-5	New Control - Augment Existing - Control ID: W00604050033	Т	CCN - 43935
V4.1033	10/30/2014	W-SMA-5	Map Revision - (R11)	т	CCN - 43935
V4.1034	10/30/2014	CDV-SMA-2.3	Retire Control - Lifecycle Expired - Control ID: V00703060009	т	CCN - 43931

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V4.1035	10/30/2014	CDV-SMA-2.3	Retire Control - Lifecycle Expired - Control ID: V00703060010	Т	CCN - 43931
V4.1036	10/30/2014	CDV-SMA-2.3	New Control - Routine/Replacement - Control ID: V00703120026	Т	CCN - 43931
V4.1037	10/30/2014	CDV-SMA-2.3	New Control - Routine/Replacement - Control ID: V00703010027	Т	CCN - 43931
V4.1038	10/30/2014	CDV-SMA-2.3	New Control - Augment Existing - Control ID: V00703060028	Т	CCN - 43931
V4.1039	10/30/2014	CDV-SMA-2.3	Map Revision - (R14)	Т	CCN - 43931
V4.1040	11/10/2014	F-SMA-2	New Control - Augment Existing - Control ID: F00103120019	Т	CCN - 44174
V4.1041	11/10/2014	F-SMA-2	New Control - Augment Existing - Control ID: F00103120020	Т	CCN - 44174
V4.1042	11/10/2014	F-SMA-2	Map Revision - (R10)	Т	CCN - 44174
V4.1043	11/17/2014	CDV-SMA-4	Map Revision - (R7)	Т	CCN - 44054
V4.1044	11/17/2014	CDV-SMA-6.02	Map Revision - (R8)	Т	CCN - 44055
V4.1045	11/17/2014	CDV-SMA-8	New Control - Augment Existing - Control ID: V01406010013	Т	CCN - 44056
V4.1046	11/17/2014	CDV-SMA-8	New Control - Augment Existing - Control ID: V01406010014	Т	CCN - 44056
V4.1047	11/17/2014	CDV-SMA-8	New Control - Augment Existing - Control ID: V01406010015	Т	CCN - 44056
V4.1048	11/17/2014	CDV-SMA-8	Map Revision - (R8)	Т	CCN - 44056
V4.1049	11/17/2014	W-SMA-8.7	Map Revision - (R5)	Т	CCN - 44066
V4.1050	11/17/2014	W-SMA-8.71	Map Revision - (R6)	Т	CCN - 44067
V4.1051	11/17/2014	W-SMA-7.8	Map Revision - (R6)	Т	CCN - 44064
V4.1052	11/17/2014	W-SMA-7.9	Map Revision - (R5)	Т	CCN - 44065
V4.1053	11/17/2014	CDV-SMA-2	Map Revision - (R6)	Т	CCN - 44061
V4.1054	11/17/2014	CDV-SMA-1.45	Map Revision - (R5)	Т	CCN - 44059
V4.1055	11/17/2014	CDV-SMA-1.7	Retire Control - Lifecycle Expired - Control ID: V00506010007	Т	CCN - 44060
V4.1056	11/17/2014	CDV-SMA-1.7	Map Revision - (R8)	Т	CCN - 44060
V4.1057	11/19/2014	W-SMA-9.7	New Control - Augment Existing - Control ID: W01503100017	Т	CCN - 43811
V4.1058	11/19/2014	W-SMA-9.7	Map Revision - (R10)	Т	CCN - 43811

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V4.1059	11/21/2014	CDV-SMA-2.5	Retire Control - Damaged and/or Replaced - Control ID: V00906010037	Т	CCN - 43514
V4.1060	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00903010043	Т	CCN - 43514
V4.1061	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00903120038	Т	CCN - 43514
V4.1062	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00903120039	Т	CCN - 43514
V4.1063	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00903120040	т	CCN - 43514
V4.1064	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00903120041	Т	CCN - 43514
V4.1065	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00903120042	т	CCN - 43514
V4.1066	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010044	т	CCN - 43514
V4.1067	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010045	Т	CCN - 43514
V4.1068	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010046	Т	CCN - 43514
V4.1069	11/21/2014	CDV-SMA-2.42	New Control - Augment Existing - Control ID: V00906010047	Т	CCN - 43514
V4.1070	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010048	Т	CCN - 43514
V4.1071	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010049	Т	CCN - 43514
V4.1072	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID: V00906010050	Т	CCN - 43514
V4.1073	11/21/2014	CDV-SMA-2.5	New Control - Augment Existing - Control ID:	Т	CCN - 43514
V4.1074	11/25/2014	W-SMA-11.7	Map Revision - (R8)	Т	CCN - 44385
V4.1075	11/25/2014	W-SMA-15.1	Map Revision - (R6)	т	CCN - 44387
V4.1076	1/23/2015	CDV-SMA-2.3	Retire Control - Damaged and/or Replaced - Control ID: V00703060022	Т	CCN - 44376
V4.1077	1/23/2015	CDV-SMA-2.3	New Control - Routine/Replacement - Control ID: V00703060029	т	CCN - 44376
V4.1078	1/23/2015	CDV-SMA-2.3	Map Revision - (R15)	Т	CCN - 44376
V4.1079	1/27/2015	W-SMA-12.05	Map Revision - (R6)	Т	CCN - 44386
V4.1080	1/27/2015	W-SMA-8	Retire Control - Damaged and/or Replaced - Control ID: W01103010007	т	CCN - 44512
V4.1081	1/27/2015	W-SMA-8	Retire Control - Damaged and/or Replaced - Control ID: W01103020008	Т	CCN - 44512
V4.1082	1/27/2015	W-SMA-8	Retire Control - Damaged and/or Replaced - Control ID: W01106010002	Т	CCN - 44512

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V4.1083	1/27/2015	W-SMA-8	New Control - Corrective Action - Control ID: W01103040010	т	CCN - 44512
V4.1084	1/27/2015	W-SMA-8	New Control - Corrective Action - Control ID: W01106010016	т	CCN - 44512
V4.1085	1/27/2015	W-SMA-8	New Control - Corrective Action - Control ID: W01103010012	т	CCN - 44512
V4.1086	1/27/2015	W-SMA-8	New Control - Corrective Action - Control ID: W01103010013	т	CCN - 44512
V4.1087	1/27/2015	W-SMA-8	New Control - Corrective Action - Control ID: W01103010014	т	CCN - 44512
V4.1088	1/27/2015	W-SMA-8	New Control - Corrective Action - Control ID: W01103010015	т	CCN - 44512
V4.1089	1/27/2015	W-SMA-8	Minor Sampler Adjustment, Updated Coordinates in Attach D.	т	CCN - 44512
V4.1090	1/27/2015	W-SMA-8	SMA Boundary Modification	т	CCN - 44512
V4.1091	1/27/2015	W-SMA-8	Map Revision - (R7)	т	CCN - 44512
V4.1092	3/10/2015	CDV-SMA-8	Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014.	т	
V4.1093	3/10/2015	W-SMA-1	Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014.	т	
V4.1094	3/10/2015	W-SMA-14.1	Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014.	т	
V4.1096	3/10/2015	CDV-SMA-2.41	Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014.	т	
V4.1097	3/10/2015	CDV-SMA-6.01	Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014.	т	
V4.1098	3/10/2015	F-SMA-2	Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014.	Т	

Type of Change **SMA Number** [Technical (T), or Section Amendment Effective Documentation (D), Number Number Date **Description of Changes** or Errata (E)] Reference V4.1099 3/10/2015 PT-SMA-1 Change to SDPPP - Storm water monitoring section updated to include Т discussion of results of storm water sampling and analyses completed in calendar year 2014. т V4.1100 3/10/2015 PT-SMA-2 Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014. V4.1101 3/10/2015 PT-SMA-3 Change to SDPPP - Storm water monitoring section updated to include Т discussion of results of storm water sampling and analyses completed in calendar year 2014. т V4.1102 3/10/2015 PT-SMA-4.2 Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014. Т V4.1103 3/10/2015 W-SMA-1.5 Change to SDPPP - Storm water monitoring section updated to include discussion of results of storm water sampling and analyses completed in calendar year 2014. V4.1104 3/10/2015 W-SMA-7 Change to SDPPP - Storm water monitoring section updated to include Т discussion of results of storm water sampling and analyses completed in calendar year 2014. V4.1105 3/17/2015 CDV-SMA-1.3 Change to SDPPP - In the storm water monitoring section for this SMA Т the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. т V4.1106 Change to SDPPP - In the storm water monitoring section for this SMA 3/17/2015 CDV-SMA-1.4 the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1107	3/17/2015	CDV-SMA-1.7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1108	3/17/2015	CDV-SMA-2	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1109	3/17/2015	CDV-SMA-2.42	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	т	
V4.1110	3/17/2015	CDV-SMA-6.01	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	т	
V4.1111	3/17/2015	CDV-SMA-7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1112	3/17/2015	CDV-SMA-8	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1113	3/17/2015	PT-SMA-2	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	т	
V4.1114	3/17/2015	PT-SMA-3	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1115	3/17/2015	PT-SMA-4.2	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	т	
V4.1116	3/17/2015	W-SMA-2.05	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1117	3/17/2015	W-SMA-5	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	т	
V4.1118	3/17/2015	W-SMA-7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1119	3/17/2015	W-SMA-8	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1120	3/17/2015	W-SMA-8.7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1121	3/17/2015	W-SMA-8.71	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	т	
V4.1122	3/17/2015	W-SMA-9.7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results.	Т	
V4.1123	3/17/2015	CDV-SMA-1.45	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1124	3/17/2015	CDV-SMA-2.41	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1125	3/17/2015	CDV-SMA-2.51	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1126	3/17/2015	CDV-SMA-3	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1127	3/17/2015	PT-SMA-0.5	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1128	3/17/2015	PT-SMA-1.7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1129	3/17/2015	PT-SMA-2.01	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1130	3/17/2015	W-SMA-1	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1131	3/17/2015	W-SMA-10	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1132	3/17/2015	W-SMA-15.1	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	

Type of Change **SMA Number** [Technical (T), Amendment Effective or Section Documentation (D), Number Number Date **Description of Changes** or Errata (E)] Reference V4.1133 3/17/2015 CDV-SMA-6.02 Change to SDPPP - In the storm water monitoring section for this SMA Т the following changes were made: Removed the sentence stating that corrective action has resulted in a decrease in concentrations of specific constituents detected in storm water samples collected from the SMA. Edited statement(s) referring to historical management of alphaemitting radionuclides at site(s) associated with the SMA. V4.1134 3/17/2015 F-SMA-2 Change to SDPPP - In the storm water monitoring section for this SMA Т the following changes were made: Removed the sentence stating that corrective action has resulted in a decrease in concentrations of specific constituents detected in storm water samples collected from the SMA. Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alphaemitting radionuclides at site(s) associated with the SMA. V4.1135 3/17/2015 PT-SMA-1 Change to SDPPP - In the storm water monitoring section for this SMA Т the following changes were made: Removed the sentence stating that corrective action has resulted in a decrease in concentrations of specific constituents detected in storm water samples collected from the SMA. Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alphaemitting radionuclides at site(s) associated with the SMA.



Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1136	3/17/2015	W-SMA-9.9	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Removed the sentence stating that corrective action has resulted in a decrease in concentrations of specific constituents detected in storm water samples collected from the SMA. Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1137	3/17/2015	W-SMA-11.7	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Removed the sentence stating that corrective action has resulted in a decrease in concentrations of specific constituents detected in storm water samples collected from the SMA. Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1138	3/17/2015	W-SMA-14.1	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Removed the sentence stating that corrective action has resulted in a decrease in concentrations of specific constituents detected in storm water samples collected from the SMA. Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	

Amendment Number	Effective Date	SMA Number or Section Number	Description of Changes	Type of Change [Technical (T), Documentation (D), or Errata (E)]	Reference
V4.1139	3/17/2015	W-SMA-1.5	Change to SDPPP - In the storm water monitoring section for this SMA the following changes were made: Edited statement introducing the comparison of constituents with storm water TAL exceedance(s) to those same constituents associated with historical activities and/or soil sampling analytical results. Edited statement(s) referring to historical management of alpha- emitting radionuclides at site(s) associated with the SMA.	Т	
V4.1140	4/13/2015	CDV-SMA-1.2	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1141	4/13/2015	CDV-SMA-1.3	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1142	4/13/2015	CDV-SMA-1.7	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1143	4/13/2015	CDV-SMA-2	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1144	4/13/2015	CDV-SMA-2.3	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1145	4/13/2015	CDV-SMA-3	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1146	4/13/2015	CDV-SMA-4	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1147	4/13/2015	CDV-SMA-6.01	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1148	4/13/2015	CDV-SMA-6.02	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1149	4/13/2015	F-SMA-2	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	
V4.1150	4/13/2015	PT-SMA-1.7	Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.	Т	

Type of Change **SMA Number** [Technical (T), Amendment Effective or Section Documentation (D), Number Number Date **Description of Changes** or Errata (E)] Reference V4.1151 4/13/2015 PT-SMA-2 Change to SDPPP - Site description(s) were updated with the current Т status of Consent Order Investigation Findings. Change to SDPPP - Site description(s) were updated with the current Т V4.1152 4/13/2015 PT-SMA-3 status of Consent Order Investigation Findings. V4.1153 4/13/2015 PT-SMA-4.2 Change to SDPPP - Site description(s) were updated with the current Т status of Consent Order Investigation Findings. т Change to SDPPP - Site description(s) were updated with the current V4.1154 4/13/2015 W-SMA-4.1 status of Consent Order Investigation Findings. Change to SDPPP - Site description(s) were updated with the current т V4.1155 4/13/2015 W-SMA-5 status of Consent Order Investigation Findings. т V4.1156 4/13/2015 W-SMA-7.9 Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings. Change to SDPPP - Site description(s) were updated with the current т V4.1157 4/13/2015 W-SMA-8.7 status of Consent Order Investigation Findings. Т V4.1158 4/13/2015 W-SMA-9.7 Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings. т V4.1159 4/13/2015 W-SMA-9.8 Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings. т V4.1160 4/13/2015 W-SMA-14.1 Change to SDPPP - Site description(s) were updated with the current status of Consent Order Investigation Findings.

Attachment 1, Amendments (continued)

Attachment 2 Vicinity Map



Attachment 3 Precipitation Network

D : C		Total	Intensity	Duration
Rain Gage	Date	(in.)	(in./30 min)	(min)
RG253	3/14/2014	0.08	0.03	95
RG253	3/15/2014	0.31	0.08	190
RG253	3/25/2014	0.05	0.01	30
RG253	3/26/2014	0.01	0.01	30
RG253	3/27/2014	0.03	0.03	30
RG253	4/3/2014	0.02	0.02	30
RG253	4/6/2014	0.01	0.01	30
RG253	4/13/2014	0.14	0.05	60
RG253	4/14/2014	0.02	0.02	30
RG253	4/19/2014	0.05	0.03	30
RG253	4/20/2014	0.01	0.01	30
RG253	4/26/2014	0.02	0.02	30
RG253	4/27/2014	0.09	0.04	60
RG253	5/12/2014	0.03	0.03	30
RG253	5/13/2014	0.03	0.03	30
RG253	5/22/2014	0.2	0.09	60
RG253	5/23/2014	0.24	0.12	60
RG253	5/24/2014	0.28	0.1	120
RG253	5/25/2014	0.14	0.07	60
RG253	5/26/2014	0.02	0.02	30
RG253	6/7/2014	0.32	0.23	60
RG253	6/13/2014	0.08	0.04	60
RG253	6/17/2014	0.04	0.02	30
RG253	6/21/2014	0.2	0.19	30
RG253	7/3/2014	0.02	0.02	30
RG253	7/4/2014	0.03	0.03	30
RG253	7/5/2014	0.01	0.01	30
RG253	7/7/2014	0.22	0.2	60
RG253	7/8/2014	0.53	0.18	120
RG253	7/9/2014	0.05	0.02	30
RG253	7/10/2014	0.22	0.17	60
RG253	7/11/2014	0.03	0.03	30
RG253	7/13/2014	0.02	0.02	30
RG253	7/14/2014	0.77	0.14	300
RG253	7/15/2014	0.46	0.16	180

Rain Gage	Date	Total (in.)	Intensity (in./30 min)	Duration (min)
RG253	7/16/2014	0.06	0.04	30 180
RG253	7/19/2014	1.06	0.46	
RG253	7/20/2014	0.07	0.04	60
RG253	7/21/2014	0.01	0.01	30
RG253	7/26/2014	0.01	0.01	30
RG253	7/27/2014	0.32	0.19	60
RG253	7/28/2014	0.17	0.06	60
RG253	7/29/2014	0.28	0.17	60
RG253	7/30/2014	0.35	0.3	60
RG253	7/31/2014	0.66	0.2	180
RG253	8/1/2014	0.28	0.08	190
RG253	8/4/2014	0.2	0.09	60
RG253	8/5/2014	0.03	0.01	30
RG253	8/8/2014	0.03	0.03	30
RG253	8/10/2014	0.02	0.01	30
RG253	8/13/2014	0.02	0.02	30
RG253	8/15/2014	0.03	0.03	30
RG253	8/22/2014	0.18	0.05	125
RG253	8/26/2014	0.06	0.02	60
RG253	9/4/2014	0.04	0.03	30
RG253	9/5/2014	0.05	0.04	30
RG253	9/22/2014	0.07	0.03	110
RG253	9/28/2014	0.04	0.04	30
RG253	9/29/2014	0.13	0.12	30
RG253	10/8/2014	0.1	0.04	60
RG253	10/9/2014	0.54	0.24	120
RG253	10/10/2014	0.12	0.03	60
RG253	10/11/2014	0.03	0.03	30
RG253	10/12/2014	0.05	0.03	30
RG253	10/17/2014	0.1	0.1	60
RG253	10/21/2014	0.02	0.02	30
RG253	10/26/2014	0.01	0.01	30
RG253	11/2/2014	0.48	0.06	180
RG253	11/14/2014	0.13	0.02	60
RG253	11/15/2014	0.04	0.02	30
RG253	11/16/2014	0.05	0.02	30
RG257	3/14/2014	0.16	0.07	195

Rain Gage	Date	Total (in.)	Intensity (in./30 min)	Duration (min)
RG257	3/15/2014	0.2	0.11	90
RG257	3/25/2014	0.04	0.02	30
RG257	3/26/2014	0.01	0.01	30
RG257	3/27/2014	0.01	0.01	30
RG257	4/5/2014	0.05	0.03	30
RG257	4/6/2014	0.04	0.02	30
RG257	4/13/2014	0.07	0.02	60
RG257	4/14/2014	0.02	0.02	30
RG257	4/19/2014	0.07	0.02	60
RG257	4/20/2014	0.01	0.01	30
RG257	4/26/2014	0.01	0.01	30
RG257	4/27/2014	0.01	0.03	60
RG257	5/12/2014	0.01	0.01	30
RG257	5/13/2014	0.01	0.01	30
RG257	5/22/2014	0.3	0.17	60
RG257	5/23/2014	0.36	0.25	60
RG257	5/24/2014	0.26	0.08	120
RG257	5/25/2014	0.06	0.03	60
RG257	6/7/2014	0.37	0.22	60
RG257	6/13/2014	0.07	0.03	60
RG257	6/17/2014	0.05	0.02	30
RG257	6/21/2014	0.22	0.22	30
RG257	7/3/2014	0.02	0.02	30
RG257	7/4/2014	0.02	0.02	30
RG257	7/7/2014	0.6	0.48	60
RG257	7/8/2014	1.8	0.48	180
RG257	7/9/2014	0.06	0.04	60
RG257	7/10/2014	0.00	0.02	30
RG257	7/11/2014	0.02	0.02	30
RG257	7/13/2014	0.01	0.01	30
RG257	7/14/2014	0.64	0.13	240
RG257	7/15/2014	0.4	0.17	120
RG257	7/16/2014	0.02	0.02	30
RG257	7/19/2014	0.82	0.25	120
RG257	7/20/2014	0.07	0.06	30
RG257	7/21/2014	0.03	0.03	30
RG257	7/27/2014	0.38	0.24	60

		Total	Intensity	Duration
Rain Gage	Date	(in.)	(in./30 min)	(min)
RG257	7/28/2014	0.16	0.07	60
RG257	7/29/2014	0.3	0.12	60
RG257	7/30/2014	0.18	0.15	60
RG257	7/31/2014	1.1	0.69	120
RG257	8/1/2014	0.21	0.05	195
RG257	8/4/2014	0.63	0.25	120
RG257	8/5/2014	0.13	0.12	30
RG257	8/8/2014	0.01	0.01	30
RG257	8/10/2014	0.09	0.09	30
RG257	8/13/2014	0.04	0.02	30
RG257	8/14/2014	0.01	0.01	30
RG257	8/15/2014	0.11	0.08	30
RG257	8/22/2014	0.13	0.04	100
RG257	8/26/2014	0.1	0.03	60
RG257	9/4/2014	0.01	0.01	30
RG257	9/5/2014	0.11	0.08	30
RG257	9/10/2014	0.01	0.01	30
RG257	9/22/2014	0.05	0.02	50
RG257	9/23/2014	0.01	0.01	30
RG257	9/28/2014	0.01	0.01	30
RG257	9/29/2014	0.09	0.09	30
RG257	10/8/2014	0.11	0.05	60
RG257	10/9/2014	0.34	0.17	60
RG257	10/10/2014	0.13	0.03	60
RG257	10/12/2014	0.04	0.03	30
RG257	10/17/2014	0.06	0.05	30
RG257	10/21/2014	0.02	0.02	30
RG257	10/26/2014	0.03	0.02	30
RG257	11/2/2014	0.36	0.06	180
RG257	11/14/2014	0.09	0.03	60
RG257	11/15/2014	0.02	0.01	30
RG257	11/16/2014	0.07	0.02	60
RG262.4	3/14/2014	0.19	0.08	180
RG262.4	3/15/2014	0.03	0.03	30
RG262.4	3/25/2014	0.03	0.03	30
RG262.4	3/26/2014	0.01	0.01	30
RG262.4	4/5/2014	0.03	0.03	30

D. C	D (Total	Intensity	Duration
Rain Gage	Date	(in.)	(in./30 min)	(min)
RG262.4	4/6/2014	0.02	0.02	30
RG262.4	4/13/2014	0.03	0.03	30
RG262.4	4/14/2014	0.01	0.01	30
RG262.4	4/19/2014	0.08	0.04	60
RG262.4	4/21/2014	0.02	0.02	30
RG262.4	5/12/2014	0.01	0.01	30
RG262.4	5/13/2014	0.02	0.02	30
RG262.4	5/22/2014	0.24	0.11	60
RG262.4	5/23/2014	0.55	0.3	120
RG262.4	5/24/2014	0.29	0.09	60
RG262.4	5/25/2014	0.04	0.01	30
RG262.4	6/7/2014	0.45	0.37	60
RG262.4	6/13/2014	0.18	0.15	60
RG262.4	6/17/2014	0.01	0.01	30
RG262.4	6/18/2014	0.01	0.01	30
RG262.4	6/21/2014	0.68	0.46	120
RG262.4	7/1/2014	0.02	0.02	30
RG262.4	7/2/2014	0.12	0.1	60
RG262.4	7/7/2014	0.22	0.17	60
RG262.4	7/8/2014	1.09	0.55	240
RG262.4	7/9/2014	0.05	0.03	30
RG262.4	7/11/2014	0.08	0.06	60
RG262.4	7/13/2014	0.02	0.02	30
RG262.4	7/14/2014	0.76	0.2	240
RG262.4	7/15/2014	0.74	0.54	120
RG262.4	7/19/2014	0.59	0.21	60
RG262.4	7/20/2014	0.04	0.04	30
RG262.4	7/23/2014	0.04	0.04	30
RG262.4	7/26/2014	0.01	0.01	30
RG262.4	7/27/2014	0.6	0.42	60
RG262.4	7/28/2014	0.24	0.08	120
RG262.4	7/29/2014	0.7	0.3	120
RG262.4	7/30/2014	0.13	0.09	60
RG262.4	7/31/2014	0.95	0.76	120
RG262.4	8/1/2014	0.28	0.15	120
RG262.4	8/3/2014	0.02	0.02	30
RG262.4	8/4/2014	0.87	0.33	120

		Total	Intensity	Duration
Rain Gage	Date	(in.)	(in./30 min)	(min)
RG262.4	8/5/2014	0.3	0.21	60
RG262.4	8/10/2014	0.25	0.25	30
RG262.4	8/15/2014	0.05	0.04	30
RG262.4	8/21/2014	0.01	0.01	30
RG262.4	8/22/2014	0.12	0.05	60
RG262.4	8/26/2014	0.69	0.2	120
RG262.4	9/5/2014	0.33	0.32	60
RG262.4	9/8/2014	0.01	0.01	30
RG262.4	9/22/2014	0.11	0.05	60
RG262.4	9/26/2014	0.01	0.01	30
RG262.4	9/29/2014	0.28	0.25	60
RG262.4	9/30/2014	0.01	0.01	30
RG262.4	10/8/2014	0.1	0.05	60
RG262.4	10/9/2014	0.4	0.21	120
RG262.4	10/10/2014	0.03	0.01	30
RG262.4	10/11/2014	0.04	0.01	120
RG262.4	10/12/2014	0.01	0.01	30
RG262.4	10/17/2014	0.12	0.1	60
RG262.4	10/21/2014	0.01	0.01	30
RG262.4	11/2/2014	0.39	0.05	180
RG262.4	11/14/2014	0.06	0.02	60
RG262.4	11/15/2014	0.01	0.01	30
RG262.4	11/16/2014	0.05	0.02	30
RG267.4	3/14/2014	0.11	0.06	80
RG267.4	3/15/2014	0.19	0.05	205
RG267.4	3/25/2014	0.04	0.01	30
RG267.4	4/6/2014	0.03	0.03	30
RG267.4	4/13/2014	0.01	0.01	30
RG267.4	4/14/2014	0.02	0.02	30
RG267.4	4/19/2014	0.1	0.03	60
RG267.4	5/12/2014	0.01	0.01	30
RG267.4	5/22/2014	0.3	0.14	60
RG267.4	5/23/2014	0.33	0.18	60
RG267.4	5/24/2014	0.27	0.08	120
RG267.4	5/25/2014	0.05	0.02	30
RG267.4	5/29/2014	0.01	0.01	30
RG267.4	6/7/2014	0.26	0.22	60

		Total	Intensity	Duration
Rain Gage	Date	(in.)	(in./30 min)	(min)
RG267.4	6/8/2014	0.02	0.02	30
RG267.4	6/21/2014	0.51	0.42	60
RG267.4	7/1/2014	0.02	0.02	30
RG267.4	7/2/2014	0.34	0.33	60
RG267.4	7/7/2014	0.33	0.33	30
RG267.4	7/8/2014	0.85	0.52	180
RG267.4	7/9/2014	0.03	0.03	30
RG267.4	7/11/2014	0.02	0.02	30
RG267.4	7/13/2014	0.01	0.01	30
RG267.4	7/14/2014	0.75	0.19	240
RG267.4	7/15/2014	0.89	0.66	120
RG267.4	7/17/2014	0.02	0.02	30
RG267.4	7/19/2014	0.48	0.26	120
RG267.4	7/20/2014	0.03	0.03	30
RG267.4	7/23/2014	0.09	0.09	30
RG267.4	7/26/2014	0.05	0.03	30
RG267.4	7/27/2014	0.38	0.33	60
RG267.4	7/28/2014	0.15	0.05	60
RG267.4	7/29/2014	0.42	0.12	120
RG267.4	7/30/2014	0.1	0.07	60
RG267.4	7/31/2014	0.64	0.48	120
RG267.4	8/1/2014	0.15	0.07	130
RG267.4	8/2/2014	0.01	0.01	30
RG267.4	8/4/2014	0.35	0.17	120
RG267.4	8/5/2014	0.22	0.17	60
RG267.4	8/10/2014	0.22	0.14	60
RG267.4	8/13/2014	0.01	0.01	30
RG267.4	8/15/2014	0.02	0.02	30
RG267.4	8/21/2014	0.02	0.02	30
RG267.4	8/22/2014	0.1	0.04	105
RG267.4	8/26/2014	0.58	0.09	240
RG267.4	8/27/2014	0.01	0.01	30
RG267.4	9/5/2014	0.15	0.14	60
RG267.4	9/8/2014	0.01	0.01	30
RG267.4	9/22/2014	0.08	0.04	145
RG267.4	9/29/2014	0.29	0.27	60
RG267.4	10/8/2014	0.1	0.05	60

Rain Gage	Date	Total (in.)	Intensity (in./30 min)	Duration (min)
RG267.4	10/9/2014	0.42	0.18	60
RG267.4	10/10/2014	0.09	0.02	60
RG267.4	10/11/2014	0.02	0.02	30
RG267.4	10/12/2014	0.02	0.01	30
RG267.4	10/17/2014	0.09	0.07	60
RG267.4	10/21/2014	0.02	0.01	30
RG267.4	11/2/2014	0.39	0.13	180
RG267.4	11/14/2014	0.05	0.02	30
RG267.4	11/15/2014	0.01	0.01	30
RG267.4	11/16/2014	0.04	0.02	30



Attachment 4 Physical Characteristics

Canyon	Permitted Feature	SMA Number	Sampler X Coordinate (Latitude)	Sampler Y Coordinate (Longitude)	SMA Drainage Area (ft²)	Site Number	Site Drainage Area (ft ²)
Cañon de Valle	V001	CDV-SMA-1.2	1611432 (35.84835)	1764078 (-106.3478)	71,098.60	16-017(b)-99 16-029(k)	1,891.44 9,387.79
Cañon de Valle	V002	CDV-SMA-1.3	1611628 (35.848233)	1764036 (-106.34715)	5,081.36	16-017(a)-99 16-026(m)	0.00 1,979.83
Cañon de Valle	V003	CDV-SMA-1.4	1611746 (35.850131)	1764727 (-106.346749)	753,588.00	16-020 16-026(l) 16-028(c) 16-030(c)	34,216.44 1.53 1,140.45 0.77
Cañon de Valle	V004	CDV-SMA-1.45	1611691 (35.84985)	1764622 (-106.346933)	745.98	16-026(i)	371.83
Cañon de Valle	V005	CDV-SMA-1.7	1613080 (35.850933)	1765018 (-106.34225)	6,008.01	16-019	6,107.99
Cañon de Valle	V006	CDV-SMA-2	1613663 (35.8498)	1764602 (-106.340283)	141,784.03	16-021(c)	17,396.36
Cañon de Valle	V007	CDV-SMA-2.3	1615798 (35.8461)	1763255 (-106.333067)	4,414,721.62	13-001 13-002 16-003(n) 16-003(o) 16-029(h) 16-031(h)	151,726.59 32,210.35 3,775.42 66,548.37 917.51 440.35
Cañon de Valle	V008	CDV-SMA-2.41	1615900 (35.849967)	1764662 (-106.332733)	105,008.00	16-018	40,161.61
Cañon de Valle	V008A	CDV-SMA-2.42	1615932 (35.849)	1764311 (-106.332617)	27,010.00	16-010(b)	17,216.77
Cañon de Valle	V009	CDV-SMA-2.5	1616475 (35.846517)	1763407 (-106.330783)	1,007,115.83	16-010(c) 16-010(d) 16-028(a)	25,089.01 28,219.01 11,573.35
Cañon de Valle	V009A	CDV-SMA-2.51	1616733 (35.846967)	1763567 (-106.329917)	130,340.52	16-010(i)	3,552.40
Cañon de Valle	V010	CDV-SMA-3	1619475 (35.847767)	1763859 (-106.320667)	14,716.22	14-009	2,592.95
Cañon de Valle	V011	CDV-SMA-4	1619753 (35.847971)	1763933 (-106.319726)	5,924.16	14-010	79.93
Cañon de Valle	V012	CDV-SMA-6.01	1620528 (35.8478)	1763869 (-106.317117)	53,452.22	14-001(g) 14-006	67.47 239.62
Cañon de Valle	V012A	CDV-SMA-6.02	1620774 (35.847745)	1763751 (-106.316283)	4,617.36	14-002(c) 14-002(d) 14-002(e)	390.13 16.61 20.92
Cañon de Valle	V013	CDV-SMA-7	1622123 (35.8453)	1762963 (-106.311733)	15,991.04	15-008(d)	391.32
Cañon de Valle	V014	CDV-SMA-8	1622591 (35.844267)	1762583 (-106.31015)	1,059,672.69	15-011(c)	0.00

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Attachment 4, Physical Characteristics (continued)

Canyon	Permitted Feature	SMA Number	Sampler X Coordinate (Latitude)	Sampler Y Coordinate (Longitude)	SMA Drainage Area (ft²)	Site Number	Site Drainage Area (ft ²)
Cañon de Valle	V015	CDV-SMA-8.5	1622359 (35.841117)	1761436 (-106.310933)	6,183.46	15-014(a)	87.44
Cañon de Valle	V016	CDV-SMA-9.05	1623846 (35.836117)	1759616 (-106.3059)	85,514.04	15-007(b)	11,687.07
Fence	F001	F-SMA-2	1632447 (35.827333)	1756418 (-106.276883)	1,710,990.84	36-004(c)	8,461.12
Potrillo	1001	PT-SMA-0.5	1625751 (35.839183)	1760731 (-106.299483)	318,686.70	15-009(e) C-15-004	57.42 65.85
Potrillo	1002	PT-SMA-1	1626387 (35.83938)	1760802 (-106.297336)	174240	15-004(f) 15-008(a)	20,138.81 553.88
Potrillo	1003	PT-SMA-1.7	1627221 (35.833404)	1758627 (-106.294518)	82,807.56	15-006(a)	146.37
Potrillo	1004	PT-SMA-2	1627867 (35.836517)	1759759 (-106.29235)	128,520.54	15-008(f) 36-003(b) 36-004(e)	2,906.56 641.17 4,895.21
Potrillo	1004A	PT-SMA-2.01	1627976.76 (35.836535)	1759680.16 (-106.291838)	6,644.25	C-36-001 C-36-006(e)	0.00 1,619.02
Potrillo	1005	PT-SMA-3	1637651 (35.829733)	1757290 (-106.259333)	32,567,818.38	36-004(a) 36-006	5,923.58 22,024.19
Potrillo	1007	PT-SMA-4.2	1640805 (35.824283)	1755302 (-106.248683)	46,479,584.84	36-004(d)	4,745.93
Water	W001	W-SMA-1	1610435 (35.842278)	1761579 (-106.351884)	257,396.04	16-017(j)-99 16-026(c2) 16-026(v)	0.00 1.56 7.03
Water	W002	W-SMA-1.5	1609271 (35.841917)	1761739 (-106.355083)	346,851.64	16-026(b2) 16-028(d)	7.03 7.03
Water	W003	W-SMA-2.05	1609892 (35.839517)	1760865 (-106.353)	38,238.00	16-028(e)	7.03
Water	W004	W-SMA-3.5	1612463 (35.837283)	1760051 (-106.344317)	79,999.28	16-026(y)	4.98
Water	W005	W-SMA-4.1	1613587 (35.83705)	1759967 (-106.340517)	13,457.43	16-003(a)	608.81
Water	W006	W-SMA-5	1614101 (35.841617)	1761625 (-106.3388)	3,106,212.41	16-001(e) 16-003(f) 16-026(b) 16-026(c) 16-026(d) 16-026(e)	211.80 176.77 2,770.92 12,687.24 7,240.26 6,643.32
Water	W007	W-SMA-6	1614205 (35.837590)	1759702 (-106.339400)			1,308.69
Water	W008	W-SMA-7	1614499 (35.83855)	1760511 (-106.33745)	98,139.69	16-026(h2) 16-029(e)	22,572.70 48.00

VOLUME 4: WATER/CAÑON DE VALLE WATERSHED Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015

Attachment 4, Physical Characteristics (continued)

Canyon	Permitted Feature	SMA Number	Sampler X Coordinate (Latitude)	Sampler Y Coordinate (Longitude)	SMA Drainage Area (ft²)	Site Number	Site Drainage Area (ft ²)
Water	W009	W-SMA-7.8	1614363 (35.836317)	1759695 (-106.3379)	68,927.10	16-031(a)	7.03
Water	W010	W-SMA-7.9	1614423 (35.83595)	1759563 (-106.3377)	293.51	16-006(c)	52.98
Water	W011	W-SMA-8 ¹	1614541 (35.836126)	1759626 (-106.337299)	9,104	16-016(g) 16-028(b)	312.57 7.03
Water	W012	W-SMA-8.7	1615647 (35.843583)	1762343 (-106.333583)	753,727.65	13-001 13-002 16-004(a) 16-026(j2) 16-029(h) 16-035	131,627.22 137,435.01 602.27 14,230.37 4,770.03 1,429.78
Water	W012A	W-SMA-8.71	1615273.3 (35.843552)	1762405.91 (-106.334599)	12,342.94	16-004(c)	335.04
Water	W013	W-SMA-9.05	1615787 (35.83502)	1759218 (-106.3331)	37,066.41	16-030(g)	7.03
Water	W014	W-SMA-9.5	1617409 (35.83875)	1760581 (-106.327633)	4,115.62	11-012(c)	929.46
Water	W015	W-SMA-9.7	1617908 (35.83905)	1760691 (-106.32595)	6,496.60	11-011(a) 11-011(b)	163.16 52.29
Water	W016	W-SMA-9.8	1618223 (35.838867)	1760621 (-106.324883)	444.31	11-005(c)	179.36
Water	W017	W-SMA-9.9	1618535 (35.838983)	1760663 (-106.323833)	13,987.15	11-006(b)	1,713.60
Water	W018	W-SMA-10	1618681 (35.837933)	1760282 (-106.323333)	337,409.32	11-002 11-003(b) 11-005(a) 11-005(b) 11-006(c) 11-006(d) 11-011(d)	6,848.23 8,878.77 1,769.64 1,723.33 2,115.86 1,343.42 96.85
Water	W019	W-SMA-11.7	1625583 (35.82445)	1755367 (-106.300033)	303,605.32	49-008(c)	84,627.27
Water	W020	W-SMA-12.05	1625910 (35.82545)	1755732 (-106.298933)	18,490.24	49-001(g)	18,378.50
Water	W021	W-SMA-14.1	1626602.93 (35.83215)	1758304.06 (-106.296763)	225,141.86	15-004(h) 15-014(l)	163.74 19.27
Water	W022	W-SMA-15.1	1627047 (35.824433)	1755361 (-106.2951)	1,624.22	49-005(a)	778.72

¹ Minor sampler movement.

Attachment 5 Sampling Requirements and Plan

Sampling and Analysis Requirements

						Analy	tical Suite					
Sampling Conditions	Gross Alpha	Ra-226/ Ra-228	Cyanide	Dissolved Metals	Total Metals	Aluminum	Copper	Mercury	Zinc	PCBs	High Explosives	SVOCs
Analytical method	EPA 900.0	EPA 903.0 EPA 904.1	SM 4500 CN-I	EPA:200.7 EPA:200.8	EPA:200.7 EPA:200.8 EPA:245.2	EPA:200.8	EPA:200.8	EPA:245.2	EPA:200.8	EPA 1668A	SW8321	EPA 625
Order code	SW-IP- Gross Alpha	SW-Ra226/ Ra-228	SW-IP- Cyanide	SW-Metals- Dissolved	SW-Metals- Total	SW-IP-Al F	SW-IP-Cu F	SW-IP-Hg F	SW-IP-Zn F	SW-PCB- 1668A-PQL	SW-HEXP-8330	SW-SVOC- 625
Field prep code	UF	UF	UF	F	UF	F	F	F	F	UF	UF	UF
Preservation	HNO3	HNO₃	NaOH, Ice	HNO3	HNO3	HNO₃	HNO₃	HNO₃	HNO₃	Ice	lce	lce, some analytes store in dark
Holding time (days)	180	180	14	180	180	180	180	180	180	365	7	7
Preferred volume (L)	2	2	1	0.5	0.5	0.5	0.5	0.5	0.5	3	2.5	3
Minimum volume required (L)	1	2	0.5	0.25	0.25	0.25	0.25	0.25	0.25	1	0.77	1
Shipping container	Poly	Poly	Poly	Poly	Poly	Poly	Poly	Poly	Poly	Glass	Glass	Amber glass

UF: Unfiltered.

F: Filtered.

Attachment 5, Sampling Requirements and Plan (continued)

Sampling and Analysis Plan

Permit SMA Number	SDPPP Section	Station Name	Stage	Gross Alpha	Ra-226/Ra-228	Cyanide	Dissolved Metals	Total Metals	Dissolved Cu	Dissolved Al	Dissolved Zn	PCBs	High Explosives	Dioxins/Furans	Pesticides	SVOCs
CDV-SMA-1.2	180	SS100421	MEx													
CDV-SMA-1.3	181	SS100422	CAI													
CDV-SMA-1.4	182	SS130425	CAI	х	Х	Х	Х	Х								
CDV-SMA-1.45	183	SS090406	CAM5	х												
CDV-SMA-1.7	184	SS2547	CAI													
CDV-SMA-2	185	SS255	CAI													
CDV-SMA-2.3	186	SS080404	MEx	х	Х	Х	Х	Х								
CDV-SMA-2.41	187	SS090407	CAI													
CDV-SMA-2.42	188	SS090408	CAI													
CDV-SMA-2.5	189	SS090420	BCComp													
CDV-SMA-2.51	190	SS090409	CAI													
CDV-SMA-3	191	SS25605	CAM5	Х									Х			
CDV-SMA-4	192	SS130424	MEx	х	Х	Х	Х	Х					Х			
CDV-SMA-6.01	193	SS090410	MEx	х	Х	Х	Х	Х					Х			
CDV-SMA-6.02	194	SS130423	CAM5	Х	Х	Х	Х	Х					Х			
CDV-SMA-7	195	SS252625	CAI													
CDV-SMA-8	196	SS25630	MEx	Х	Х	Х	Х	Х								Х
CDV-SMA-8.5	197	SS090418	MEx	Х	Х	Х	Х	Х								
CDV-SMA-9.05	198	SS090412	MEx	Х	Х	Х	Х	Х								Х

Attachment 5, Sampling Requirements and Plan (continued)

Sampling and Analysis Plan (continued)

Permit SMA Number	SDPPP Section	Station Name	Stage	Gross Alpha	Ra-226/Ra-228	Cyanide	Dissolved Metals	Total Metals	Dissolved Cu	Dissolved Al	Dissolved Zn	PCBs	High Explosives	Dioxins/Furans	Pesticides	SVOCs
F-SMA-2	199	SS092401	CAI													
PT-SMA-0.5	200	SS26565	CAM5	Х					Х	Х			Х			Х
PT-SMA-1	201	SS124815	CAM5	Х	Х	Х	Х	Х					Х			Х
PT-SMA-1.7	202	SS134817	CAI	х	Х	Х	Х	Х					Х			
PT-SMA-2	203	SS2658	MEx	х	Х	Х	Х	Х					Х			х
PT-SMA-2.01	204	SS124816	CAM5	Х	Х	Х	Х	Х					Х			х
PT-SMA-3	205	SS094807	MEx	х	Х	Х	Х	Х					Х			
PT-SMA-4.2	206	SS094806	MEx	х	Х	Х	Х	Х					Х			
W-SMA-1	207	SS133939	CAM5	х	Х	Х	Х	Х								
W-SMA-1.5	208	SS103928	CAM5						Х		Х					
W-SMA-2.05	209	SS093903	CAM5			Х				Х						
W-SMA-3.5	210	SS103929	MEx	Х	Х	Х	Х	Х								
W-SMA-4.1	211	SS103930	MEx	Х	Х	Х	Х	Х					Х			
W-SMA-5	212	SS2528	CAI													
W-SMA-6	213	SS133940	MEx	Х	Х	Х	Х	Х					Х			
W-SMA-7	214	SS25243	MEx	Х	Х	Х	Х	Х								
W-SMA-7.8	215	SS103931	MEx	Х	Х	Х	Х	Х								
W-SMA-7.9	216	SS103932	MEx	Х	Х	Х	Х	Х								Х
W-SMA-8	217	SS143941	CAI													
W-SMA-8.7	218	SS103933	CAI													

Los Alamos National Laboratory, NPDES Permit No. NM0030759, May 1, 2015 **VOLUME 4: WATER/CAÑON DE VALLE WATERSHED**

Attachment 5, Sampling Requirements and Plan (continued)

Sampling and Analysis Plan (continued)

Permit SMA Number	SDPPP Section	Station Name	Stage	Gross Alpha	Ra-226/Ra-228	Cyanide	Dissolved Metals	Total Metals	Dissolved Cu	Dissolved Al	Dissolved Zn	PCBs	High Explosives	Dioxins/Furans	Pesticides	SVOCs
W-SMA-8.71	219	SS123938	CAI2	Х	Х	Х	Х	Х								
W-SMA-9.05	220	SS093914	BCComp													
W-SMA-9.5	221	SS093915	MEx	х	Х	х	х	Х								
W-SMA-9.7	222	SS093916	CAI													
W-SMA-9.8	223	SS093917	MEx	Х	Х	Х	Х	Х								
W-SMA-9.9	224	SS103934	CAM5	Х		Х				Х						
W-SMA-10	225	SS25245	CAM5	Х		Х										
W-SMA-11.7	226	SS103935	CAM5	Х						Х						
W-SMA-12.05	227	SS093922	MEx	Х	Х	Х	Х	Х					Х			
W-SMA-14.1	228	SS123937	CAM5	Х	Х	Х	Х	Х					Х			
W-SMA-15.1	229	SS093927	CAM5	Х												

MEx = Extended Baseline Monitoring: One confirmation monitoring sample is collected to determine if corrective action is required.

CAI = Corrective Action Initiated: A sample was collected during baseline confirmation monitoring, and analytical results show at least one pollutant concentration is above TAL, resulting in initiation of corrective action.

CAI2 = Corrective Action Initiated, Second go-around: A sample was collected during baseline confirmation monitoring, and analytical results show at least one pollutant concentration is above TAL for a second time, resulting in second initiation of corrective action.

CAM5 = Corrective Action Enhanced Control Monitoring: Two confirmation monitoring samples are collected following completion of corrective action control measures at moderate priority sites within 5 yr of effective date of the Permit.

BCComp = Baseline Complete: All results for pollutants of concern at SMA are at or below the TALs, no further sampling is required at the SMA.

Attachment 6 Additional Compliance Status Details for SMAs/Sites in Corrective Action

SMA	Site List	Additional Compliance Status Details
CDV-SMA-1.3	16-017(a)-99 16-026(m)	TAL exceedance constituents are not known to be associated with industrial materials managed at these Sites; therefore the Permittees have pursued COCs to complete corrective action for these Sites as allowed under Section E.2.(d) of the IP. Under the Consent Order, the Permittees request COCs from NMED for Sites that have achieved RCRA corrective action complete status. However, the Permittees cannot certify completion of corrective action under the Individual Permit until COCs has been received from NMED. This Site has obtained RCRA corrective action complete status, but a COC request has been delayed pending resolution of NMED's comments. The Permittees intend to resolve NMED's comments and submit a request for COCs in May of 2015. If NMED does not respond to the COC request, the Permittees will submit a force majeure request 45 d before the Permit deadline.
CDV-SMA-1.7	16-019	The corrective action for the Site in this SMA was initiated by a TAL exceedance during the September 2013 1000-yr storm event that resulted in non-IP flood recovery maintenance efforts across LANL. Shortly after this severe storm event, work ceased as a result of the federal government shutdown in October 2013. In addition, the 1000-yr storm event resulted in TAL exceedances at an unprecedented number of SMAs. Each of these SMAs required evaluation through the screening process. For those SMAs with Site(s) that are likely or potentially a source of the TAL exceedance, the Site is recommended to undergo alternatives analysis. The alternatives analysis process evaluates the possible corrective action controls, including installation of enhanced controls, total retention, no exposure, and Site remediation. This process requires coordination with the Consent Order, cultural resource, biological resource, facility, and LANL subject matter experts to plan and implement. Once the corrective action control is designed, it must be scheduled after restricting events such as winter weather and seasonal biological habitat restrictions are over. The Permittees plan to certify enhanced controls for this Site in 2015.
CDV-SMA-2	16-021(c)	Evaluation of corrective action alternatives following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Site in this SMA is not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit will likely not be reissued before the deadline for corrective action (November 1, 2015). Therefore, to maintain compliance with the Permit, the Permittees plan to submit a request for alternative compliance for the Site in this SMA by May 1, 2015.

Attachment 6, Additional Compliance Status Details for SMAs/Sites in Corrective Action (continued)

SMA	Site List	Additional Compliance Status Details
CDV-SMA-2.42	16-010(b)	Site 16-010(b) was removed from the list of corrective action units in the Laboratory's Hazardous Waste Facility Permit following approval of the closure certification report by the NMED in 2005. Evaluation of corrective action through the IP screening process following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Site in this SMA is not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit is not likely to be issued before the deadline for corrective action. While the Site has no history of industrial activities associated with PCBs, the PCBs exceedance for this SMA exceeds natural background concentrations, and the surrounding area has a history of PCB use. Therefore, instead of submitting a request for alternative compliance as originally planned, the Permittees plan to certify enhanced controls for the Site in this SMA in 2015.
CDV-SMA-2.51	16-010(i)	Evaluation of corrective action alternatives following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Site in this SMA is not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit will likely not be reissued before the deadline for corrective action (November 1, 2015). Therefore, to maintain compliance with the Permit, the Permittees plan to submit a request for alternative compliance for the Site in this SMA by May 1, 2015.
CDV-SMA-6.01	14-001(g) 14-006	The Permittees plan to certify enhanced controls for the Sites in this SMA before the corrective action deadline of November 1, 2015.
CDV-SMA-7	15-008(d)	Evaluation of corrective action through the IP screening process following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Site in this SMA is not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit is not likely to be issued before the deadline for corrective action. While the Site has no history of industrial activities associated with selenium, there is no natural background concentration for selenium for which to compare the TAL exceedance. Therefore, instead of submitting a request for alternative compliance as originally planned, the Permittees plan to certify enhanced controls for the Site in this SMA in 2015.
CDV-SMA-8	15-011(c)	Evaluation of corrective action alternatives following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Site in this SMA is not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit will likely not be reissued before the deadline for corrective action (November 1, 2015). Therefore, to maintain compliance with the Permit, the Permittees plan to submit a request for alternative compliance for the Site in this SMA by May 1, 2015.
F-SMA-2	36-004(c)	The Permittees plan to certify enhanced controls for the Site in this SMA before the corrective action deadline of November 1, 2015.

SMA	Site List	Additional Compliance Status Details
PT-SMA-1	15-004(f) 15-008(a)	The Permittees plan to certify enhanced controls for the Sites in this SMA before the corrective action deadline of November 1, 2015.
PT-SMA-2	15-008(f) 36-003(b) 36-004(e)	The Permittees plan to certify enhanced controls for the Sites in this SMA before the corrective action deadline of November 1, 2015.
PT-SMA-3	36-004(a) 36-006	The Permittees plan to certify enhanced controls for the Sites in this SMA before the corrective action deadline of November 1, 2015.
PT-SMA-4.2	36-004(d)	The Permittees plan to certify enhanced controls for the Site in this SMA before the corrective action deadline of November 1, 2015.
W-SMA-1	16-017(j)-99 16-026(c2) 16-026(v)	The Permittees plan to certify 16-017(j)-99 for no exposure in 2015. For the remaining Site in this SMA, the TAL exceedance constituents are not known to be associated with industrial materials managed at these Sites, and exceedance values are consistent with storm water background concentrations; therefore, the Permittees plan to submit a request for alternative compliance for the Sites in this SMA in 2015.
W-SMA-1.5	16-026(b2) 16-028(d)	The Permittees plan to certify enhanced controls for the Sites in this SMA before the corrective action deadline of November 1, 2015.
W-SMA-5	16-001(e) 16-003(f) 16-026(b) 16-026(c) 16-026(d) 16-026(e)	TAL exceedance constituents are not known to be associated with industrial materials managed at these Sites; therefore, the Permittees have pursued COCs to complete corrective action for these Sites as allowed under Section E.2.(d) of the IP. It is anticipated that a recommendation for COCs will be made to NMED for the Sites within this SMA through submittal of the SIR for the S-Site Aggregate Area. The SIR is a Consent Order deliverable and was delayed based on reprioritization of Consent Order activities to support the transuranic waste removal program. The SIR is currently scheduled to be submitted to NMED in 2015. Because of the delay in submitting and the need to maintain compliance, the Permittees plan to submit a request for alternative compliance for the Sites in this SMA in 2015.
W-SMA-7	16-026(h2) 16-029(e)	The Permittees plan to certify enhanced controls for the Sites in this SMA before the corrective action deadline of November 1, 2015.

Attachment 6, Additional Compliance Status Details for SMAs/Sites in Corrective Action (continued)

Attachment 6, Additional Compliance Status Details for SMAs/Sites in Corrective Action (continued)

SMA	Site List	Additional Compliance Status Details
W-SMA-8	16-016(g) 16-028(b)	The corrective action for the Sites in this SMA was initiated by a TAL exceedance during the September 2013 1000-yr storm event that resulted in non-IP flood recovery maintenance efforts across LANL. Shortly after this severe storm event, work ceased as a result of the federal government shutdown in October 2013. In addition, the 1000-yr storm event resulted in TAL exceedances at an unprecedented number of SMAs. Each of these SMAs required evaluation through the screening process. For those SMAs with Site(s) that are likely or potentially a source of the TAL exceedance, the Site is recommended to undergo alternatives analysis. The alternatives analysis process evaluates the possible corrective action controls, including installation of enhanced controls, total retention, no exposure, and Site remediation. This process requires coordination with the Consent Order, cultural resource, biological resource, facility, and LANL subject matter experts to plan and implement. Once the corrective action control is designed, it must be scheduled after restricting events such as winter weather and seasonal biological habitat restrictions are over. The Permittees plan to certify enhanced controls for these Sites in 2015.
W-SMA-8.7	13-001 13-002 16-004(a) 16-026(j2) 16-029(h) 16-035	Evaluation of corrective action alternatives following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Sites in this SMA are not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit will likely not be reissued before the deadline for corrective action (November 1, 2015). Therefore, to maintain compliance with the Permit, the Permittees plan to submit a request for alternative compliance for the Sites in this SMA by May 1, 2015.
W-SMA-8.71	16-004(c)	Evaluation of corrective action through the IP screening process following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Site in this SMA is not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit is not likely to be issued before the deadline for corrective action. While the Site has no history of industrial activities associated with copper, the copper TAL exceedance for this SMA exceeds natural background concentrations, and the copper may be associated with the wastewater treatment plant. Therefore, instead of submitting a request for alternative compliance as originally planned, the Permittees plan to certify enhanced controls for the Site in this SMA in 2015.
W-SMA-9.7	11-011(a) 11-011(b)	Evaluation of corrective action alternatives following a confirmation sample TAL exceedance led the Permittees to initially select submittal of an alternative compliance request to demonstrate the Sites in this SMA are not contributing to the TAL exceedance. However, discussions with EPA indicated it would prefer such Sites be addressed through the Permit renewal process. The process has been delayed and the new Permit will likely not be reissued before the deadline for corrective action (November 1, 2015). Therefore, to maintain compliance with the Permit, the Permittees plan to submit a request for alternative compliance for the Sites in this SMA by May 1, 2015.
W-SMA-14.1	15-004(h) 15-014(l)	TAL exceedance constituents are not known to be associated with industrial materials managed at these Sites, and exceedance values are consistent with storm water background concentrations; therefore, the Permittees plan to submit a request for alternative compliance for the Sites in this SMA in 2015.